

Citizen Action
Citizens for Alternatives to Radioactive Dumping
Concerned Citizens for Nuclear Safety
Los Alamos Study Group
Peace Action New Mexico
Physicians for Social Responsibility
Loretto Community (Sisters and Co-members)
Southwest Research and Information Center
Water Information Network



July 11, 2001

Steve Pullen
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Dear Mr. Pullen:

The above groups, which collectively represent thousands of New Mexicans, request an extension of the public comment period for the proposed Triassic Park Waste Management Facility Permit until December 31, 2001. Re-issuing the draft permit did give citizens some extra time to review the application and draft permit, however even more time is needed to review these complex and voluminous documents. The permit process for this facility has already been pending for several years; Gandy-Marley, Inc. will not be adversely impacted by the granting of this extension by the New Mexico Environment Department (NMED). This extension of time is needed for the following reasons:

1. This facility is located in a rural, agricultural area. Our members who live in this area, members of Conservative Use of Resources and Environment (CURE) which we support, and other citizens in the local area are involved in their busiest work time right now. These rural people are often working from sun-up to past sundown with branding, ranching, planting, harvesting and other similar economic activities. This leaves them very little time to be able even to view the application and draft permit, let alone study them in detail as is necessary in order to make informed comments. This intensity of work will continue through the fall harvest time. The extension is needed so that people most affected by the facility will be able to study these documents either little by little over a long period of time or to wait until harvesting is over so that they can devote a shorter, but more concentrated period of study to the draft permit and application.
2. Currently, the draft permit is available in only 2 places in the proposed facility area—only one of which is open after business hours. The application is available only in Roswell and several crucial documents including the site characterization are still not available in that area; only summaries of summaries of these documents will be in Roswell until the next round of information meetings. Therefore, for a large portion of the present comment period, important portions of the application have been essentially unavailable to those potentially most affected by this waste dump. In addition, many of the key NMED people involved with the permitting process for this facility have taken

vacations during the current comment period and have not been available to answer questions and provide help to citizens.

3. Not only do citizens need to familiarize themselves with the application and draft permit, but since people most directly affected by the permit have not been involved in this process before, they also need to acquire knowledge about the Resource Conservation and Recovery Act (RCRA), the New Mexico Hazardous Waste Act (NMHWA), the hearing process, and an understanding of the hydrology, geology and potential sociological and economic impacts the proposed facility will have on their area. It simply takes a certain amount of time to find and absorb all this information, and time is something that most people living in the facility area do not have until after fall harvest time. Comments from citizens who are well-informed on the issues will certainly be of more help to NMED than general comments based on little more than intuition.

3. Finally, most of the above-named groups are also involved in the Waste Isolation Pilot Plant (WIPP) operating permit modification process. Recently, there have been two modifications under consideration, one of which is a class III modification and therefore requires a large amount of study and attention in itself. Those of our members who are, perhaps, somewhat more knowledgeable about the permit process are therefore, the same people who are stretched thin trying to study the Triassic Park draft permit and application and the two WIPP modifications at the same time. Those people simply need more time to be able to devote an adequate amount of attention to each of these complex documents.

Thank you for your consideration of our request.

Sincerely,



Deborah Reade (for)

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