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The WIPP permit has already been violated. The "self-regulated" waste emplaced by the DOE should not have been mixed with post-permit waste. The modification should be a Class 2 or 3. The permit should have been rejected then, and should be revoked NOW.

1. Alternate method for groundwater testing: All radionuclides should be measured. Since I am convinced that WIPP will leak, there is no such thing as over-testing the water around the site! I suggest testing for specific radionuclides and gross alpha and beta.
2. Changes in determining how many waste containers must be opened for visual examination: There must be no short-cuts in examining containers. Since we know how DOE has conducted business in the past, regulations should prevent a continuation of sloppy and deceptive practices. (I understand there was an example of mis-labeling at the Albuquerque hearing). Every container must be opened and inspected.
3. No sampling for VOCs in the headspace of containers if information about the waste generating process shows that the waste doesn't contain VOC-related hazardous waste: Information about containers cannot be trusted. Mis-labeling, haphazard handling (for how many years?), and human-error was rampant in the past, and I am not too confident about the present, despite DOE assurance.
4. Flexible sampling for VOCs: No flexibility...for same reasons. It is better to over-sample than to miss potential danger.
5. No sampling for VOCs in the headspace of containers if the waste was thermally processed. No, again....please do not cut back on sampling!
6. Revise criteria for demonstrating the accuracy of the procedures and instruments used to measure crosols and pyridine: I have not enough info to comment on this modification, but my reasons for NOT modifying other regulations apply here.

The collusion between the DOE and NMED sickens me. It reminds me of the teacher who gives the answers to the class so that they SCORE HIGH. You must STOP CHEATING!

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