

Subject: WIPP Class 2 Permit Mod

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9/13/00

Opposition to DOE Class 2 Permit Modification to the WIPP

We oppose the changes to the current WIPP operating permit due to the following:

1. The request for a Class 2 permit modification to the WIPP proposed by DOE increases the likelihood of accidents and releases of hazardous waste into the environment by characterization of waste at the WIPP;
2. The proposed changes are obviously DOE's way of turning the site into a high level waste repository with wastes stored either above ground or buried permanently at the WIPP. This change runs contrary to the WIPP's mission of storage of UNDER-GROUND waste, not above-ground waste;
3. Under the permit mod more waste will be shipped to the WIPP increasing the likelihood of highway accidents and public exposure to hazardous wastes, especially when shipments of high level waste to New Mexico begins;
4. Due to the uncertainty of the contents of much of the drums CHARACTERIZATION OF WASTE SHOULD OCCUR BEFORE IT LEAVES ITS PARENT FACILITY, NOT AT THE WIPP. Again, this change runs contrary to WIPP's original mission: sealed drums will only be accepted at WIPP and will not be opened in order to protect human health and the environment;
5. Additionally, we are appalled (but not surprised) to hear that DOE would request a change that would usurp even more of the state's regulatory oversight in requesting to eliminate the audit and surveillance program currently being implemented for waste characterization at other DOE sites;
6. We ask that NMED takes a firm stand on DOE's slow method of one proposed modification after another until New Mexico finally becomes the site of the nation's first high level waste dump - with more to follow.

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