

**Subject: DAC****Date:** Sun, 04 Feb 2001 13:23:31 -0700**From:** Penny McMullen <mcmullensl@netzero.com>**To:** steve\_zappe@nmenv.state.nm.us

Dear Steve Zappe,

The Sisters of Loretto oppose the Class 2 modification for Drum Age Criteria (DAC), and request that the New Mexico Environment Department (NMED) deny it.

Our reasons are as follows:

We are concerned that the DOE will not be able to accurately determine the number of bags and thicknesses of bags within the drums, and the permit request does not adequately specify how they would do this. We were told at the Jan. 11 meeting that they would use Xray to determine number of bags by counting horsetails, but we have learned since that this won't work because sometimes there are more than one bag tied by one horsetail. Thus DOE would think the equilibrium time is shorter when it really is longer.

The DOE also plans to rely on records of contents to determine the waiting period, but it is known that the records are frequently wrong.

The Doe could therefore underestimate the amount of VOCs in thousands of drums. So obviously the waste analysis requirements would not be met, under 40 CFR 264.

Such underestimates could result in too many of drums passing through transport routes and going to WIPP which should not be transported to WIPP. The increased amount of VOCs could endanger public health and the environment.

We were told by DOE at the Jan. 11 meeting that the reason for this new permit request is that they are in a hurry to move waste drums from INEEL. This permit, however, if granted would apply to all sites. We do not want our safety compromised because some site wants to hurry the process. Our safety is too important, and any contamination would affect generations to come. We must take the time to do it right.

Thank you for your patience in answering my questions in January.

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