

**New Mexico Toxics Coalition
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 ENTERED

September 26, 2001

Steve Zappe
New Mexico Environment Department
2905 Rodeo Park Drive East - Bldg. 1
Santa Fe, New Mexico 87505



Dear Mr. Zappe:

I am writing on behalf of the New Mexico Toxics Coalition (NMTC) to request that you deny the Class 3 Modification to the Waste Isolation Pilot Plant (WIPP) Permit.

The existing application is technically inadequate and administratively incomplete.

The Department of Energy (DOE) proposal to perform confirmation of waste characterization at WIPP greatly endangers public health and the environment, by increasing the danger of accidents and releases of waste to the environment.

The opening of waste drums at WIPP is in direct violation of the facility's original mission which prohibits such activities. Full confirmation and characterization must be done at the generator to ensure that no prohibited items are shipped to WIPP.

There is no economic justification to support the DOE's assumption it can save money by confirming waste at WIPP.

Additionally, NMTC fully supports the comments and reasons to deny the Class 3 Modification to the WIPP Permit put forward by Concerned Citizens for Nuclear Safety. We strongly urge you, and the New Mexico Environment Department, to uphold your responsibility to protect public health and the environment by denying this modification.

Thank you in advance for your attention to this important matter.

Sincerely,



Coila Ash
Executive Director

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