

New Mexico Toxics Coalition
A solidarity movement toward a sustainable and nonviolent future
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ENTERED

June 27, 2002

Steve Zappe
New Mexico Environment Department
2905 Rodeo Park Drive, Building 1
Santa Fe, New Mexico 87505



RE: WIPP Drum Age Criteria (DAC) Draft Permit Modification

Dear Mr. Zappe:

The New Mexico Toxics Coalition (NMTC) requests that the New Mexico Environment Department (NMED) deny the WIPP DAC permit modification because it is unnecessary and is not adequately supported technically. NMTC believes that the request does not explain why the modification is necessary as set forth in The New Mexico Hazardous Waste Act regulations. NMTC concurs with, and refers you to, the comments submitted by Southwest Research and Information Center to support our conclusion that the request is not technically supported and should be denied.

Should NMED not deny the modification, NMTC supports requests for a public hearing on the matter. Further, NMTC requests that any public hearing be postponed from the currently announced date of August 26, 2002. Given that there are other pending Class 3 modifications (the Centralized Confirmation Facility and the Remote-Handled Waste modification) any public hearing on the DAC modification should be delayed and consolidated with hearings on those related modifications.

Additionally, NMTC believes that the permittee's submission of inadequately prepared permit modification requests and the lack of consolidation of related modifications creates an unnecessary burden on the public and is not an effective use of NMED resources. NMED should exhaust any and all of its regulatory means to remedy this situation immediately.

Thank you for your consideration of these comments.

Sincerely,

Handwritten signature of Coila Ash in cursive.

Coila Ash
Executive Director

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A standard 1D barcode with the number 020635 printed above it.