

DEC 2002



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Dear Mr. Zappe;

Hi there, i hope you are well and having a good holiday season.

When i have tried to reach you, i failed, but hope you can mail me a copy of "the Permittees' compliance history during the life of the permit" for future reference, and my files.

But, these are my comments about the proposed "revised panel closure system", and the "fact sheet" that announced this permit modification request. Since it is DOE who writes these "fact sheets", it is rare for them to represent the truth. While stating that NMED issued the original permit in 1999, they neglect to mention that; 1) DOE opened the facility themselves without a permit and 2) used threats, bribery and extortion to force the State of New Mexico into this pretense of an agreement.

Usually these pages claim to be to protect human health and the environment, but not this one, so that is telling. I wonder how many panels have been closed using the original plan? At the time of the hearings, i felt that it was flawed, structurally, to suggest that method could protect even the WIPP workers from toxic and explosive vapors, or the results of the ceiling collapses (which are part of the plan as yet untested) and who knows how much weight^{will be} bearing down and pressing out upon these supposed closures.

So permeability is the first issue, which was not really addressed. Gases and vapors are everywhere and isolation them is not easy and requires air locks, or something. And since the WIPP Site is surrounded by a high pressure brine reservoir, it is likely that at some point a ceiling collapse with the fissures and voids it creates will allow this brine to enter adding not only liquid but further pressure on these "closures". Stress factors and weight distribution will vary with each room and these^f is little data except that the Bin Tests were so embarrassing that the tapes conveniently dissappeared.

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We all know that salt corrodes metal and deterioration of the drums is inevitable. The ceilings are full of slag bolts wire mesh and other objects which will also puncture these drums when they collapse. Having a really impermeable, tight seal is probably impossible with anything as soft as salt. WIPP workers are human canaries in this toxic waste mine. Room Number One must be passes to access all of the other rooms and proper closure of the panels and rooms, if this is truly possible, is vital. I believe that gravity, along with the shrinkage of cement mortar drying, will make a truly tight seal impossible, because small cracks will appear at the top, and along the seams, from day one. Add to this the stress factors from ceiling collapses and brine incursion, and the pressure inside a closed room can increase incredibly.

Earth berm dams may be fine for a farm stock watering pond, but even then they are not that reliable and frequently burst during or after heavy rains. And, real earth berm dams require compaction, with heavy equipment rolling over each layer again and again, to create what little stability they can afford. There can be no structurally viable way to compact the mine salt backfill into ~~the~~ salt floor, walls and ceiling. That is, one cannot drive heavy equipment over backfill that goes up to the ceiling. And even if it could be compacted, it would still be permeable. Salt is not clay, much less sturdy than concrete, itself and more permeable. Not that i am suggesting the use of clay, because i'm not. Just that any earth berm structural data available is probably for clay, which is heavier than salt and less soluble and porous. This is no time or place to be doing experiments in structural engineering.

The whole closure plan was always very ill-conceived, and the quote from the Fact Sheet, "will maintain the same level of safety, require less complex construction, be more cost effective and reduce risk to workers.", inclines me to believe that the level of safety was never that good, and that worker safety is only a facade, as usual with DOE. Is having access to escape barred by 100 foot of backfill much more safe than having it barred by a 26-foot thick concrete wall when displacement does occur? Certainly the 100 foot of backfill will block more of the passage way. If the salt backfill spills out, will it not impair access to the motor vehicles? Will it not add to the rate of deterioration ~~rate~~ of all metallic structural devises?

Of course i've not mentioned the word radiation, since the State of New Mexico can have no say about the amount of radiation that pollutes our air, water, land and lives. But how can NMED do it's duty and protect the environment without consideration these materials as hazardous? Lead is what X-Ray machines have as protective barriers. X-Ray machines are turned on and off, mostly they are off, but radioactive waste is on all of the time. Medical professionals are better informed and educated than WIPP workers, and as a result have higher standards than the DOE who purposfully misinform and mislead as well as coerce their workers.

The WIPP closure plans have never met my standards for health and safety protection, and this proposal is a big step in the wrong direction. I hope the NMED will insist that these closures be made impermeable to liquid, gases and radiation under at least 100 tons of pressure. This would be almost conservative, but complete isolation of this waste has always been impossible, and that is why i've always opposed this project. The explosive nature of some mixed waste, and chemical reactions when these wastes mix are all wild cards to compound a complex situation.

The current panel closure system is inadequate and needs to be improved and fortified beyond the imagination, and probably beyond existing engineering knowledge; and definately beyond the minimal expenditures DOE is interested in spending on clean-up. I don't remember if the air shafts will be closed with room closures, or how much monitoring can be done in the "sealed" rooms, but the amount of pressure which can build up in these first panels and rooms, before the last panels and rooms would be supposidly finished would be impossible to accurately estimate, due to so many variables. Nothing is impossible, and fire in the rooms is a definate possibility which i neglected to mention, but must also be included, as evidenced at Rocky Flats.

The filling of WIPP panels must stop until an effective closure plan can be agreed upon. Cost should not be an issue since DOE gets a huge percent of our taxes ^{while} ~~and~~ creating enormous hazards.

Thank you for denying this request. Yours in peace,

bonnie bonneau

