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March 12, 2004

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

Dear Mr. Zappe:

The EEG has the following comments on the Permit Modification requests for the Waste Isolation Pilot Plant Hazardous Waste Facility Permit for the Upgrade of the Waste Conveyance Loading Car (Class 2).

Item 1. Upgrade of the Waste Conveyance Loading Car (Class 2)

The Permittees are requesting to use either the current waste conveyance loading car or to use an automated conveyance car. In addition, a different nomenclature is proposed, that is to change from "conveyance loading car" to facility transfer vehicle. The current waste conveyance loading car has been in operation for a number of years and the Permittees indicate that it is now difficult to obtain spare parts. The Permittees may wish to consider selecting another name for the vehicle in order to avoid any confusion. Perhaps Facility Pallet Transfer Vehicle or Pallet Transfer Vehicle might be appropriate.

Moreover, the waste handling capability of the Facility Transfer Vehicle will be reduced from 36,000 pounds to 26,000 pounds, a payload reduction of 28% (Table M2-1, Waste Handling Equipment Capabilities). This means that both the existing conveyance loading car and the new automated vehicle will be limited to 26,000 pound payload.



Mr. Steve Zappe

3/12/2004

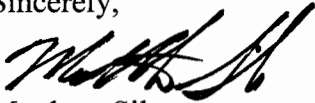
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Comment: It would be reasonable to explain why the existing conveyance vehicle payload will be reduced by 28%.

Appendix D, (information on typical automated vehicles) is mentioned on pages 1 and 2 in the PMR text. Appendix D is not listed in the Table of Contents and is not included in the PMR.

Comment: It would be useful to have this information available.

Sincerely,



Matthew Silva

Director

MS:GA:pf

cc: Paul Detwiler, DOE/CBFO
Steven Warren, WTS