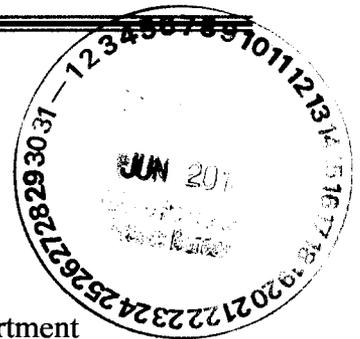


PECOS MANAGEMENT SERVICES, INC.

June 7, 2010

Mr. Vernon Daub, Deputy Manager
U.S. Department of Energy
Carlsbad Field Office
PO Box 3090
Carlsbad, NM 88221

Mr. Steve Zappe
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive, Building E
Santa Fe, NM 87505



Subject: Contract No. DE-AC30-06EW03005, "Class 2 PMR Request - VOCs."
PECOS Document #2010-C-0039

Dear Mr. Daub and Mr.Zappe:

PECOS Management Services, Inc (PECOS) has reviewed the Class 2 Permit Modification Request (PMR) "Revise Volatile Organic Compound Concentrations of Concern and Update These Values Using Current EPA IRIS Data" dated April 2010 and makes the following observations and comments which should be appropriately included in the public record for this PMR.

Notwithstanding the fact that the risk associated with the current volatile organic compound (VOC) levels being measured in the underground is calculated to be only 6.2×10^{-7} excess cancer related deaths compared to the permitted value of 1.0×10^{-5} , this Class 2 PMR is justified in order to correct the earlier assumptions regarding the expected carcinogenic content of the TRU waste deposited in WIPP and the resultant VOC repository concentrations at the point of measurement.

The updated concentration expectations based upon current transuranic waste and VOC monitoring information and experience along with updated IRIS data provide a logical and scientifically acceptable basis for the Class 2 PMR.

While not anticipated, future changes in experienced carcinogenic VOC concentrations and or EPA IRIS data could require another similar Class 2 PMR in which allowable concentrations are adjusted as needed while the calculated risk is maintained within the permitted value of 1.0×10^{-5} .

Given that the actual requirement is that the 1.0×10^{-5} risk value not be exceeded, PECOS believes that it is more appropriate that the Class 2 PMR be based directly on this risk value rather than individual VOC component concentrations. We note that the same data would be required and that sudden unexpected changes in the exhaust VOC data would still be noted and their risk impact evaluated as necessary.



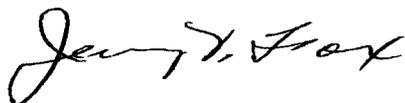
PECOS MANAGEMENT SERVICES, INC.

Mr. Vernon Daub
Mr. Steve Zappe
June 7, 2010
Page 2

The above comments notwithstanding, PECOS believes the Class 2 PMR is acceptable and reasonable as presented.

Please call me or Christopher Timm at (505) 323-8355 should you have any questions.

Sincerely,



Jerry V. Fox, PhD
Project Director

cc: G. Basabilvazo, DOE
R. Nelson, DOE
S. Keeney, PECOS
C. Timm, PECOS