

## Zappe, Steve, NMENV

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**From:** Janet [contactus@cardnm.org]  
**Sent:** Saturday, June 19, 2010 6:27 PM  
**To:** Zappe, Steve, NMENV  
**Subject:** VOC Comments

Comments Concerning Class 2 Permit Modification, Request to Revise Volatile Organic  
Compound Concentrations of Concern

Steve Zappe  
New Mexico Hazardous Waste Bureau  
2905 Rodeo Park Drive  
Santa Fe, NM 87505

June 19, 2010

Dear Mr. Zappe,

We regret that these comments are late and will understand if they are not considered.

CARD does not believe that this modification would have been necessary if the Department of Energy had looked further ahead when they saw that VOC levels were rising at WIPP; we do not like the precedent that this modification sets for the future of WIPP's Hazardous Waste Permit.

Our position is that any modification that requires a risk assessment or a modification thereof should be delegated as a Class 3 modification. Class 2 should be reserved for issues that are more easily understandable and less crucial to worker and the public health and well being

We ask that explosion-isolation walls be built wherever they can ameliorate rising VOC levels at WIPP and that all other means possible be used to head off any health risks to workers or the public. Generator sites should be required to participate in this process.

New Regulatory limits for Carbon Tetrachloride should reflect the fact that WIPP personnel will not be able to quickly lower the VOC levels at WIPP if they rise to or close to concentrations of regulatory concern.

Also, the rate at which VOC levels will rise, which they most probably will, is a factor of great uncertainty. For these reasons, I regret that we are considering this modification; I believe that the permit limits as they stand reflect WIPP's unique position in regard to VOC s and are of the standard that most engender confidence in the safety of the WIPP facility.

CARD supports the comments of Don Hancock and SRIC on the subject of this modification.

Sincerely,

Janet Greenwald

Co-coordinator  
Citizens for Alternatives  
To Radioactive Dumping

