

To: NMED, DOE/WTS and "West Siders"
From: Joni Arends, CCNS
Date: June 21, 2010
Re: WIPP Negotiations - CCNS Comments



1. Specific comments:
 - a. Section 1.3.3 Permit Review - how is public advised of the five-year review?
 - b. Section 2.3.3.1 - add "hydrogen fluoride" to "Containers with HazWaste No. U134 assigned shall have no observable liquid."
 - c. Section 2.6.3 - are livestock allowed in PPA?
 - d. 3.7.2 Inspection - last sentence - what does it mean?
 - e. Section 5.10 - add "as it becomes available" to first sentence of Section 5.10.1 per the regulations.
 - f. Section 6.5.2 - remove second "shall"
 - g. Section 8.13 cleanup levels - please add "as updated" to text and in reference section
 - h. Section 8.14 - change "Attachment" to "Section"
2. Comments about surge:
 - a. WGA WP 08-NT3001, Rev. 2 "Volume Control of Parking Area Storage Unit," 10/21/09

p. 3 of 5: Why aren't any records generated by the performance of the procedure?

Does the procedure need a map to designate the surge storage area?
 - b. WGA fact sheet - CCNS has specific concerns about the description "Bad Weather and Road Conditions" For example regarding LANL shipments, I've seen the loaded WIPP trucks on the roads around 5 pm in the Totavi and Pojoaque areas. I've seen the trucks parked at Totavi and the new travel trailer park on the west side of 84/285 frontage road in Pojoaque. This is a time of

"heavy traffic" and "rush hour" for our area and the shipping schedule should be adjusted accordingly to avoid "rush hour."

4/22/13