



**Kliphuis, Trais, NMENV**

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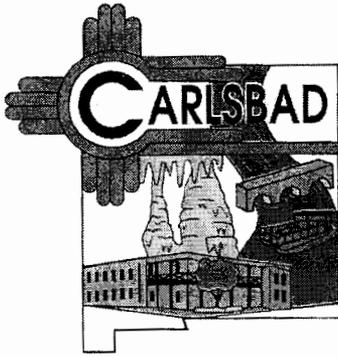
**From:** Mayor Office <mayor.office@cityofcarlsbadnm.com>  
**Sent:** Monday, February 11, 2013 9:54 AM  
**To:** Kliphuis, Trais, NMENV  
**Subject:** Mayor's letter  
**Attachments:** Trais Kliphuis ltr.pdf

Hello,

Please see the attached letter from Mayor's office.

Thank you *Cheyenne Methola*  
*Assistant to Mayor Dale Janway*  
*101 N. Halagueno St.*  
*Carlsbad, NM 88220*  
*575.887.3798*  
*mayor.Office@cityofcarlsbadnm.com*





**DALE JANWAY**  
MAYOR

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**JON R. TULLY**  
CITY ADMINISTRATOR

February 8, 2013

Ms. Trais Kliphuis  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, N.M. 87505  
[Trais.kliphuis@state.nm.us](mailto:Trais.kliphuis@state.nm.us)

Dear Ms. Kliphuis:

My name is Dale Janway, and I'm proudly serving the City of Carlsbad, New Mexico, as its mayor. Today I'm addressing the Class 2 permit modification request package submitted to the New Mexico Environment Department by the Department of Energy on December 12, 2012. I will be submitting these comments on the record to the New Mexico Environment Department as well.

First of all, thank you all for attending the meeting to discuss this topic. I appreciate the New Mexico Environment Department's efforts in putting together a very comprehensive regulatory process to make sure that WIPP is safe. Most importantly, I very sincerely want to thank all of the members of the public who are here today to learn about this process. We often talk about how proud this community is of WIPP, but I also want to stress that we have an incredible thirst for knowledge when it comes to the Waste Isolation Pilot Plant. The residents of this community have a strong background in mining and the extractive industries, and we're always happy to join in on discussions involving these topics.

Today's permit modification would revise the Waste Analysis Plan characterization methods so that waste characterization would be accomplished using acceptable knowledge and radiography or visual examination. Chemical sampling would no longer be a requirement when deciding what is to be sent to WIPP.

I consider this proposed change to be fair and reasonable, given my understanding of the issue. It is my understanding that, throughout the almost 14 year history of WIPP, there has never been a case where chemical sampling has changed the designation of what is in a WIPP drum. In other words, the other methods of examining the drums that are being sent to WIPP have provided a completely accurate profile about what is going to WIPP. Waste that should not be sent to WIPP is not sent to WIPP.

**COUNCILORS**

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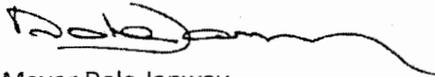
Redundancies are important at WIPP. We want everything examined from multiple angles, but there will still be redundancies in characterization even without chemical sampling. Approving this permit modification would simply eliminate what we now know is an expensive and ineffective means of identifying waste.

Price is not the top priority at WIPP. Safety is the top priority. But if the DOE can show that something can be done just as safely for the same price, then it is worthwhile. Chemical sampling is extremely expensive and DOES NOT provide us with any information we are not getting from other sources through multiple means.

It's also worth noting that there are steps before and after the characterization process. All of the states that send waste to WIPP have hazardous waste rules of their own. On the other end of the process, WIPP will continue its extensive monitoring system at the site to make sure that there are no chemical release issues.

Let's not lose site of the goal of the characterization process. We're doing this to make sure the contents of the drums that are sent to WIPP are understood and can be properly handled. In my opinion, this change will in no way impact the safety of WIPP's workers.

Thank you for your presentation today,

A handwritten signature in black ink, appearing to read "Dale Janway", with a long, sweeping underline that extends to the right.

Mayor Dale Janway

## Kliphuis, Trais, NMENV

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**From:** Russell Hardy <rhardy@cemrc.org>  
**Sent:** Monday, February 11, 2013 2:57 PM  
**To:** Kliphuis, Trais, NMENV  
**Subject:** public comment on DOE/CBFO request to revise waste analysis plan for waste characterization methods

Good afternoon, I am writing in support of the DOE/CBFO's and the NWP's request to revise the waste analysis plan for waste characterization methods. In their plan, DOE/CBFO and NWP recommend eliminating the headspace gas sampling for non-solid waste and eliminating core-sampling for solid waste constituents claiming that the analysis creates additional costs but does not provide useful information in terms of waste characterization. In reviewing the information provided and by listening to presentations by DOE/CBFO and NWP staff, I concur that such methods are likely redundant and expensive and, as a result, do not provide additional benefits with respect to waste characterization. Further, I believe that current and on-going monitoring and analysis of the air within the repository and the waste panels for volatile organic compounds (VOCs) as well as for Hydrogen and Methane provides additional protections for the workforce that might be missed in the absence of the proposed change.

Therefore, I support the proposed modification to eliminate headspace gas and core sampling on the assumption that the repository and waste panels/waste rooms will continue to be monitored for the presence of volatile organic compounds (VOCs) as well as for the presence of Hydrogen and Methane. Should the agency or the contractor or both propose to eliminate or minimize monitoring and analysis of air within the repository, waste panels, or waste rooms at any point in the future with respect to VOCs, Hydrogen, and Methane, then I believe that headspace gas monitoring and core sampling of waste be reinstated as a measure of ensuring worker safety within the underground environment. For without either one, there will be no canary left in the mine with respect to the presence of VOCs, Hydrogen, or Methane. Therefore, I believe that one or the other must be maintained, at all times, as a matter of employee protection until the repository is closed and shuttered to human access.

Thank you.

Russell Hardy, Director  
Carlsbad Environmental Monitoring and Research Center  
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Carlsbad, NM 88220  
(575) 234-5555