

FW: WIPP Class 3 Modification

Kliphuis, Trais, NMENV
Sent: Tuesday, April 16, 2013 8:31 AM
To: Allen, Pam, NMENV
Cc: Maestas, Ricardo, NMENV



From: Dave Sepich [mailto:dsepich@springtimesupply.com]
Sent: Tuesday, April 16, 2013 8:30 AM
To: Kliphuis, Trais, NMENV
Subject: WIPP Class 3 Modification

April 16, 2013

Ms. Trais Kliphuis
New Mexico Environment Department Hazardous Waste Bureau
2905 Rodeo Park Drive, Building E
Santa Fe, New Mexico 87505

Re: WIPP Class 3 Modification

Dear Ms. Kliphuis:

As a resident of Carlsbad for most of my life, I am very familiar with mining in salt. My grandfathers and uncles on both sides of my family worked in coal mines in Northern New Mexico and Wyoming since the early 1900's. My father spent over 45 years in coal and potash mines. I myself worked in one of the mines for a short time during my college years. To say the least, most of the residents of Carlsbad have close connections to mining.

Because of this background, we as a community understand the operations of mining in salt, and the risks and challenges that brings. When it comes to the mining operations of WIPP, it is much easier for us to understand how and why things are done for worker safety.

As a business owner in Carlsbad, I volunteer on many of the community civic projects. I currently am serving as Chairman of the Mayor's Nuclear Task Force Permit Modification Review Committee. We are challenged with reviewing all Permit Modification Applications for WIPP.

I along with the other committee members have spend several days meeting with WIPP, NWP, Sandia and Los Alamos personnel to make sure we have a complete understanding of the current Class 3 Permit Modification. The first part of the Modification to change the Panel Closure design is a very good improvement over the original design. It provides for a faster way to safely close the panels while providing at least an equally sufficient barrier to the original design, which we felt had a lot of unanswered engineering questions.

The change of the Repository Configuration part of the permit makes complete sense to anyone who has worked in a Potash Mine. Trying to widen the old main access drifts to be able to store waste, is dangerous in our opinion. This is the oldest part of the mine, and requires continuous maintenance to protect workers. The process of widening these drifts to accommodate the equipment for the storage of RH waste would create a higher level of potential ceiling problems. We completely support the mining of new panels for 9 and 10.

The changes for the third part of the Modification concerning the VOC testing was the most intensive part of our review. We reviewed the current process as well as the proposed process. At first we were concerned about reducing the number of target gases, but when we reviewed the historical data, the changes made sense. The most important part is to understand that the test will still show if something new or different shows up, and if it does it can be investigated. If it is something of concern, it can be added as a target. We completely support the changes to this testing especially because of the new technology that will be used.

Because of my involvement in this research, I completely support the approval of the WIPP Class 3 Modification.

Sincerely:
Dave Sepich
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