

FW: Public Comment on Proposed Modification to the Hazardous Waste Facility Permit for WIPP

Kliphuis, Trais, NMENV
Sent: Thursday, May 02, 2013 7:59 AM
To: Allen, Pam, NMENV
Cc: Maestas, Ricardo, NMENV



From: Russell Hardy [mailto:rhardy@nmsu.edu]
Sent: Monday, April 29, 2013 3:21 PM
To: Kliphuis, Trais, NMENV
Cc: bobby.stjohn@wipp.ws
Subject: Public Comment on Proposed Modification to the Hazardous Waste Facility Permit for WIPP

My name is Russell Hardy and I am a lifelong resident of southeast New Mexico. In addition, I am the Director of the Carlsbad Environmental Monitoring & Research Center (CEMRC), an entity of New Mexico State University, which conducts an independent environmental monitoring program of the WIPP site on behalf of the residents of Carlsbad and southeast New Mexico.

As a citizen of Carlsbad, I wholeheartedly support the DOE and the NWP's request to modify the Hazardous Waste Facility Permit for the WIPP site to remove the tank waste exclusion language from the current permit. In my opinion, this exclusion clause should have never been added to the hazardous waste permit in the first place and appears to have only been added due to political reasons, not scientific ones.

One reason that I support the removal of this clause is because the current waste acceptance criteria used by DOE and/or NWP in terms of accepting waste for disposal at the WIPP site is sufficient to ensure that only defense-related transuranic waste will be accepted and disposed of within the WIPP repository. That being said, there is no reason to add an arbitrary clause that excludes "tank waste" as a political means to prevent high-level sludge or some other incompatible waste from being shipped to or disposed of within the WIPP facility. A second reason that I support the removal of this clause is because there are approximately 20+ tanks at the Hanford site that appear to contain waste constituents that are equivalent to other "non-tank" waste that is currently being shipped to and disposed of within the WIPP repository, which will certainly help improve the environment in the state of Washington, not to mention help keep WIPP workers busy and productive for several years to come. In my opinion, shipping this waste (and other Hanford waste that meets the current waste acceptance criteria) for permanent disposal at the WIPP site is the safest, quickest, and most economical means of dealing with the waste and is certainly preferable to leaving it in place or seeking some other method of treating the waste such as vitrification.

Therefore, for these reasons, I approve of the request to amend the hazardous waste facility permit for WIPP and I encourage the NMED to accept this modification as has been presented by the DOE and the NWP on behalf of the WIPP site.

Sincerely,

Russell Hardy

