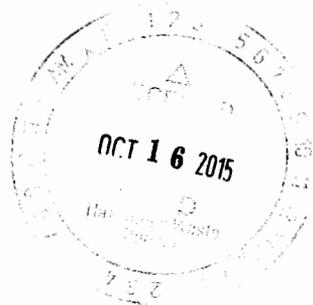


ENTRANCED



October 15, 2015

Ricardo Maestas:

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

Ricardo.Maestas@state.nm.us

Dear Mr. Maestas:

Mr. Maestas, as chairman of the Carlsbad Mayor's Nuclear Task Force regulatory review subcommittee, I submit the following findings.

The Mayor's Nuclear Task Force is an advisory committee consisting of about 40 area business, governmental, scientific and political leaders who serve to ensure that Mayor Dale Janway and other elected officials are well informed when deciding what is in the community's best interest on nuclear-related industries. John Heaton is chair of the task force.

Our regulatory subcommittee met with WIPP officials on several occasions to review and discuss the current proposal to make several changes to WIPP's Volatile Organic Compound (VOC) monitoring procedure. Our goal is to make sure WIPP's host community, Carlsbad, is represented in this permit modification process, and to ensure that these modifications are in the community's best interests in terms of worker and citizen safety.

As the host community of a nationally important project such as this, it is extremely important that we make our voice heard. Our subcommittee considers the PMR to be an improvement to the Hazardous Waste Facility Permit and recommends its approval. After an extensive review, it is apparent that the proposed changes do not reduce or diminish VOC sampling.

We appreciate WIPP's willingness to meet with us, to answer our questions and to consider our suggestions. We especially value the fact that the draft submitted to the state includes revisions, based in part on our recommendation, that detail the fact that WIPP's underground workers are being protected from VOCs by several additional underground monitoring processes.

This PMR is an improvement for several key reasons, including:

1. This proposed modification adds one chemical agent, trichloroethylene (TCE), to the VOC target analyte list for VOC monitoring. No chemical agents are removed from the monitoring list.



2. The monitoring stations are being moved because the previous sampling stations (in the permit) pose additional risk due to the possibility of radiological contamination, and WIPP has already been using these new monitoring stations since last year's radiological release. WIPP used an air dispersion model to decide on the best location, and provided a good explanation of why it decided on this location.
3. Our subcommittee had several questions about the additional VOC monitoring taking place at the facility, which is now addressed in the draft permit. This particular VOC monitoring plan deals specifically with monitoring workers at the above-ground portion of the WIPP facility for potential chronic (over time) exposure. Workers in the WIPP underground are monitored for possible acute exposure through the permit, and all potential exposures (both chronic and acute) are additionally monitored through WIPP's industrial hygiene program.
4. This plan will involve switching to higher tech sampling equipment that is easier to use and less likely to develop leaks, meaning increased accuracy and precision in monitoring.
5. The proposal includes a revision to the formula WIPP uses for risk calculation, as associated with VOCs. The new formula is a better fit with other similar regulatory formulas, makes it easier to add additional analytes to the monitoring list in the future, simplifies reporting and, finally provides a better assessment of health impacts since it considers both the carcinogenic and non-carcinogenic effects of these compounds.

In conclusion, there is nothing in this permit that diminishes WIPP's VOC monitoring. Improved equipment, additional target chemicals and a better risk calculation formula will improve WIPP's ability to monitor and protect its workers. We encourage the NMED to approve this Class 2 PMR.

Dave Sepich,
Regulatory Subcommittee Chair
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