

Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Wednesday, February 10, 2016 11:30 AM
To: Allen, Pam, NMENV
Subject: FW: WIPP Permit Modification Comment

From: Russell Hardy [<mailto:rhardy@nmsu.edu>]
Sent: Tuesday, October 27, 2015 2:18 PM
To: Maestas, Ricardo, NMENV
Cc: Russell Hardy; Basabilvazo, George - DOE (George.Basabilvazo@wipp.ws)
Subject: WIPP Permit Modification Comment

Good afternoon. My name is Russell Hardy and I am the Director of the Carlsbad Environmental Monitoring & Research Center (CEMRC), an entity of New Mexico State University and I am submitting a formal comment to be considered as part of the class two permit modification request process being submitted by the DOE and its contractor (NWP).

The CEMRC is funded by the U.S. Department of Energy to conduct an independent environmental monitoring program in conjunction with the Waste Isolation Pilot Plant (WIPP). In my role as Director of CEMRC, I am very involved with WIPP operations and as such, I have attended numerous meetings to hear and to understand the current permit modification for the hazardous waste facility permit as it relates to repository monitoring of volatile organic compounds (VOCs) at the WIPP. As a result of attending these meetings and discussing, in detail, the various aspects of the current permit modification for VOC sampling, I support the DOE and the contractor's request, in its entirety, to move underground repository sampling for VOCs to the surface as the current VOC sampling areas (denoted in the permit as VOC station A and VOC station B) are located in contaminated portions of the repository and, since the February 14, 2014 underground radiation release event, WIPP employees have been unable to sample in these areas. In addition to the underground contamination issue, recent improvements in technology and instrumentation have made it possible to make surface sampling a reality as detection limits for VOCs at the PPT (parts-per-trillion) level are readily achievable, thereby allowing for samples to be collected on the surface even though those samples have been further diluted by air traveling from the underground. Additionally, I believe that the DOE/Contractor's request to move repository VOC sampling from the underground to the surface makes sense from both a worker protection point of view as well as a scientific feasibility point of view. Further, I believe that the basis for repository sampling for VOCs is to ensure that surface workers are not exposed to dangerous levels of VOCs. Therefore, by moving this sampling to the surface, the DOE/Contractor are now directly assessing the air that workers in close proximity to emissions from the WIPP underground exhaust shaft are located. Additionally, if this request is approved as submitted, underground workers at WIPP will continue to be protected by two other monitoring programs – 1) disposal room VOC monitoring (which will occur once waste emplacement in the underground is restarted) and 2) WIPP Industrial Health monitoring which currently occurs prior to employees entering an area in the underground and continues to occur as long as personnel are working in underground areas. Therefore, for these reasons, I support the permit modification being submitted by the DOE/Contractor at the WIPP.

Lastly, I would like to disclose that I am directly affected by this decision as my employer (NMSU/CEMRC) currently holds a contract with the NWP to perform analysis of VOC, Hydrogen, and Methane samples from the WIPP underground and/or surface of the WIPP site.

Thank you for the opportunity to voice my support of this permit modification request. Please let me know if you have any questions or need any additional information.

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