



Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Monday, August 15, 2016 2:18 PM
To: Allen, Pam, NMENV
Subject: FW: DOE Class 2 Permit Modification Public Comment

From: Russell Hardy [<mailto:rhardy@cemrc.org>]
Sent: Monday, July 11, 2016 2:28 PM
To: Maestas, Ricardo, NMENV
Cc: 'rhardy@nmsu.edu'
Subject: DOE Class 2 Permit Modification Public Comment

Good afternoon Ricardo, I am submitting a public comment in support of the DOE's Class 2 Permit Modification to revise the RCRA Contingency Plan and to modify the airflow requirements and VOC contaminant modeling requirements necessary to resume waste emplacement while operating under a reduced airflow scenario.

Because of my position as the Director of the Carlsbad Environmental Monitoring and Research Center (CEMRC) and as a member of the Carlsbad Mayor's Nuclear Taskforce, I am included in many discussions regarding proposed changes to the WIPP hazardous waste permit. As a result, I have participated in several meetings with DOE/NWP staff to discuss the aforementioned proposed permit modifications and have attended both public information meetings in Santa Fe and Carlsbad where the information included in the permit modifications have been discussed. Therefore, based on these discussions with DOE/NWP staff and presentations to public stakeholders, I would like to provide my personal support to the DOE/NWP in their request to modify the existing hazardous waste permit.

Specifically, I believe that the approval of the requested modification to the RCRA contingency plan will help streamline and update the emergency response/emergency notification processes at the WIPP site and will ultimately improve the overall safety and incident reporting requirements needed when responding to a hazardous waste incident at the facility. Further, the proposed changes not only better align the RCRA contingency plan to NMED requirements but also better align the WIPP RCRA contingency plan with other similar plans within the State such as those at the Sandia National Laboratory and the Los Alamos National Laboratory. Secondly, I believe that the proposed modifications to the underground airflow requirements, the proposed implementation of VOC contaminant modeling requirements, and the proposed alternative waste emplacement remedial action plan all serve to provide adequate flexibility in terms of continuing waste emplacement activities under a reduced airflow scenario brought about by the February 14, 2014 underground radiation event without impacting worker safety.

Thank you for the opportunity to voice my support for these proposed changes, please let me know if you have any questions or need any additional information pertaining to this matter.

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