

Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Wednesday, October 05, 2016 1:21 PM
To: Allen, Pam, NMENV
Subject: FW: I support revisions to the RCRA Contingency Plan at WIPP

From: Chester, Tonk T - Carlsbad [<mailto:Tonk.Chester@mosaicco.com>]

Sent: Thursday, August 04, 2016 12:21 PM

To: Maestas, Ricardo, NMENV

Subject: I support revisions to the RCRA Contingency Plan at WIPP

Dear Mr. Maestas,

I am writing you today to let you know that I am personally in full support of the revisions to the RCRA Contingency Plan at the WIPP facility here in Carlsbad, New Mexico.

Why do I support these changes? Here are a few key reasons from our community's standpoint:

1. The revisions to the RCRA Contingency Plan (Plan) will align it more closely with other similar plans, both at the WIPP facility and across the state, thereby eliminating potential confusion and simplifying implementation of the Plan.
2. The revision assigns specific duties and responsibilities to the newly formed WIPP Fire Department and increases the level of training for emergency response personnel, which improves on the effectiveness of the facility's ability to respond to emergencies.
3. The proposed changes to the Active Room Ventilation Flow Rate will allow the Permittees to continue with waste emplacement in cases where an active room ventilation flow rate of 35,000 standard cubic feet per minute can't be met. This change better allows the Permittees to make smart, common-sense decisions on a case-by-case basis that will protect workers from possible VOC emissions. For example, the Permittees may be able to remediate a situation by taking actions such as: evaluating VOC air monitoring information, increasing air monitoring in the affected areas, and, if necessary, requiring personal protective equipment such as air-filtering respirators to be worn.
4. The proposed changes to the actions required when hazardous levels of VOCs are approached in closed areas of the mine will allow the WIPP Permittees and the NMED to work closely together in developing an action plan that allows the WIPP facility to use valuable disposal space in the underground while protecting workers. The NMED will be directly involved in these safety discussions.

Overall, this permit modification increases the state's involvement in the decision-making process in certain circumstances within its scope of authority. We believe this is a benefit to the citizens of Eddy and Lea Counties and of New Mexico and an improvement to process at the WIPP facility.

Thank you,



Tonk



Tonk Chester, SPHR, SHRM-SCP | Human Resources Manager
The Mosaic Company | 1361 Potash Mines Road | Carlsbad, New Mexico, 88220
P: 575.628.6234 | C: 575.302.7179 | F: 575.628.6263 | E: tonk.chester@mosaicco.com |
W: www.mosaicco.com

 **Go Green: Please do not print this e-mail unless you really need to.**