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DALE JANWAY
Mayor

STEVE MCCUTCHEON
CITY ADMINISTRATOR



August 5, 2016

To: Mr. Ricardo Maestas
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505
Ricardo.maestas@state.nm.us

Dear Mr. Maestas:

The Department of Energy recently submitted a Class 2 permit modification request package to the New Mexico Environment Department. As Mayor of the City of Carlsbad, I'm submitting this letter in support of this proposed modification.

Here are a few of the reasons why these proposed modifications are in the best interests of WIPP and our residents.

- The revisions to the RCRA Contingency Plan will align it more closely with other similar plans, both at the WIPP facility and across the state, thereby eliminating potential confusion.
- The revision assigns specific duties and responsibilities to the newly formed WIPP Fire Department and increases the level of training for emergency response personnel.
- 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.
- 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 instead of having to vacate it while protecting workers. The NMED will be directly involved in these safety discussions.

We believe this proposed Class 2 Permit Modification Request is a benefit to our citizens and an improvement to process at the WIPP facility.

Sincerely,


Carlsbad Mayor Dale Janway

160807



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