



Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Wednesday, October 05, 2016 1:27 PM
To: Allen, Pam, NMENV
Subject: FW: Public Comment about June 2016 Class 2 Permit Modification Requests about Reducing Room Ventilation Rate and the Contingency Plan at the Waste Isolation Pilot Plant

From: Deborah Reade [<mailto:reade@nets.com>]
Sent: Monday, August 08, 2016 2:01 PM
To: Maestas, Ricardo, NMENV
Subject: Re: Public Comment about June 2016 Class 2 Permit Modification Requests about Reducing Room Ventilation Rate and the Contingency Plan at the Waste Isolation Pilot Plant

August 8, 2016
Mr. Ricardo Maestas
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

Dear Mr. Maestas:

These are my public comments about the Class 2 Permit Modification Requests to the Waste Isolation Pilot Plant (WIPP) hazardous waste permit issued by the New Mexico Environment Department (NMED).

1. Reducing Room Ventilation Rate. The request should be denied. WIPP is trying to pretend that everything is okay underground now and that it isn't a major problem to allow workers underground with only 25% of previous airflow. In fact, considering the history of incompetent work at WIPP and inadequate supervision by NMED over the years, more caution needs to be followed for *all* work there. The original regulations for VOC concentrations and ventilation safety were put in for a reason.

Frankly, WIPP is unsafe and should be shut down. Ventilation is reduced because air has to be filtered because there is still excess radiation underground. Workers in some areas still have to wear radiation suits. Now you want to put people in complete safety suits with their own ventilation because you can't provide enough breathable air. Working in such suits, whether for radiation or for hazardous conditions is clearly an emergency condition. WIPP may plan to open in December, but unless people can work underground without emergency protective gear of any kind, WIPP is still in emergency conditions and cannot be opened for normal operations. This modification anticipates working in protective gear or using other emergency measures indefinitely. This should not be allowed

The request should also be denied because the modification is open ended on what emergency measures could be taken to allow people to work underground when there are high concentrations of VOCs.

If there is not adequate ventilation for waste emplacement, no such activity should be allowed. By trying to



cobble together ways to continue to work underground under unsafe, emergency conditions and pretend that this can be turned into "normal working conditions" shows that *the culture of ignoring safety to meet arbitrary deadlines is continuing*. DOE, NMED and LANL have clearly learned nothing from the explosion and total debacle that occurred in 2014 and are continuing with their "magical thinking." Though WIPP should be permanently closed, any work there should only take place using extra safety precautions, not while trying to ignore the situation as it exists in reality.

2. Contingency Plan. The Plan should be revised to reflect the significant existing underground contamination from the February 2014 waste drum(s) explosion. This is especially true for the E-300 drift (tunnel), which cannot be used as a secondary evacuation route because respiratory protection equipment is and must be required to be used in more than 2,000 feet of that drift. The problems caused by the underground contamination must be addressed before WIPP can be re-opened.

Thank you for your careful consideration of my comments. I look forward to receiving the NMED's response.

Sincerely,
Deborah Reade
117 Duran Street
Santa Fe NM 87501