August 8, 2016

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

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

Dear Mr. Maestas:

I read with alarm the proposal for modifications of the WIPP permit that diminish the accepted standards for assuring worker safety.

I provide the following 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. To allow workers in active rooms with waste handling occurring with less than 35,000 standard cubic feet per minute (scfm) of ventilation is not protective of worker and public health and the environment. If there is not adequate ventilation for waste emplacement, no such activity should be allowed.

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 NMED’s response.

Sincerely,

Basia Miller, Ph.D
Santa Fe resident