Dear Ricardo Maestas, and friends,

These are comments on the WIPP permit modifications and proposed changes.

1.) The bulkhead building is one thing but to terminate monitoring and tests for volatil gases is too dangerous. Whatever can and will happen in the "closed panels" should be observed and documented. This is obviously essential to anyone who might work there. With no monitoring you have no clue to flood, fire, burbling ooze..... Please maintain all monitoring behind the bulkheads and make lots of emergency plans.

2.) The giant above ground storage sounds like building a "terrorist target" to me. Is this some kind of final chapter for the "national sacrificial area"? There is no need, they do not use the above ground storage that exists. But, there are plans to ship weapons grade plutonium
to WIPP, 14 tons or more. So, the one accident at WIPP probably left labs with some waste piled up, but let them keep it until the facility is ready to operate at a safe pace and properly prepare the new panels and tunnels and other infrastructure. Such a large backlog at the recycling end would be a big problem the next time there is a "little accident." Imagine having to ship it all back, again.

Both the packaging and the content of the drums may expand with extreme heat and contract with extreme cold. Temperatures over 100°F are common in Carlsbad’s summers while temperatures in the WIPP are constant (in the 50’s I think). Direct sunshine can serve to solar heat the casks even more. How much temperature change, for how long of period, can the seals survive?
Excessive heat and cold will also alter the way the contents of the drums interact. Freezing cold can crack and break frozen contents and extreme heat may make other contents goopy or runny or rank. Summer and winter day and night temperatures can change 30° or 40° in 24 hours. Repeat for a month or more and stir things up.

All this makes moving the surface stored waste potentially much more dangerous to the workers and the environment. And they will require three times more handling. Everything outdoors is subject to the wind and gusts of 80 miles an hour can spread any accident at that rate. Please deny this request and also the request to stop monitoring behind bulk loads. Thank you.

Bonnie Bonneau