

Allen, Pam, NMENV

From: Biswell, David, NMENV
Sent: Monday, February 05, 2018 9:00 AM
To: Allen, Pam, NMENV
Cc: Maestas, Ricardo, NMENV
Subject: FW: DOE/NWP Class Two Permit Modification for the Waste Isolation Pilot Plant



From: Maestas, Ricardo, NMENV
Sent: Tuesday, January 30, 2018 8:15 AM
To: Biswell, David, NMENV <David.Biswell@state.nm.us>
Subject: FW: DOE/NWP Class Two Permit Modification for the Waste Isolation Pilot Plant

From: Russell Hardy [<mailto:rhardy@nmsu.edu>]
Sent: Monday, January 29, 2018 2:38 PM
To: Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>
Cc: Russell Hardy <rhardy@nmsu.edu>; 'Basabilvazo, George - FedNet (george.basabilvazo@cbfo.doe.gov)' <george.basabilvazo@cbfo.doe.gov>; 'Rick.Chavez@wipp.ws' (Rick.Chavez@wipp.ws)' <Rick.Chavez@wipp.ws>
Subject: DOE/NWP Class Two Permit Modification for the Waste Isolation Pilot Plant

Good afternoon Ricardo, I am writing in support of the proposed class two permit modifications being submitted by the DOE and NWP on behalf of the Waste Isolation Pilot Plant (WIPP).

In my opinion, a majority of the proposed changes are of no consequence to the hazardous waste facility permit and should be approved by the NMED. These include the proposed changes to the WIPP training program, the moving of training requirements from the permit to the WIPP facility files, the modification of the property protection area, and the proposed changes to the fire-water distribution system, the staging area and evacuation routes, and the list of emergency equipment in the RCRA Contingency Plan.

While I understand that there may be considerable opposition to the remaining proposed changes, mostly from northern New Mexico constituents, including the addition of a new filter building, a revision to the description of the underground ventilation system, a revision of the WIPP mine ventilation rate monitoring plan, and a revision of the closure plan to include decontamination and decommissioning of the exiting interim ventilation system components within the WIPP underground – ***I fully support these proposed changes as well*** as I believe these proposed changes are desperately needed to restore the ventilation flow rate within the repository to a level that will support simultaneous underground mining and waste emplacement activities.

As you well know, this has not been possible since the February 14, 2014 underground radiation event contaminated a substantial portion of the WIPP underground exhaust drift – forcing the facility to operate in a continuously filtered environment, significantly dropping the underground air flow from approximately 460,000 cfm prior to the event to approximately 104,000 cfm currently. This change in airflow has seriously hampered the contractor and the owner's ability to emplace waste and resume mining in a timely manner – not to mention the slowdown experienced with roof bolting and other maintenance-related activities that have had to be delayed due to insufficient airflow or due to a limit imposed on the number of personnel allowed in the underground as a result of inadequate ventilation.

As you know, I am the Director of the Carlsbad Environmental Monitoring and Research Center (CEMRC), an entity of the New Mexico State University system that performs an independent environmental monitoring program in conjunction with the WIPP. Like the NMED, our group also collects WIPP exhaust and ambient air samples at and near the facility



and analyzes them for the presence of radiological and/or non-radiological constituents likely to be found in WIPP waste. In this role, I fully understand and support the need for the new filter building as the current one is undersized and was never engineered for continuous filtration of the WIPP underground. Further, I know that the current monitoring stations at Station A and Station B are several decades old and are nearing the end of their useful lives; therefore, this proposed modification (the creation of a new filter building) would correct several issues currently faced at the facility such as the replacement of the pre-HEPA and post-HEPA monitoring stations as well as providing sufficient airflow in the underground by surpassing the previous 460,000 cfm ventilation flow rates and allowing the facility to operate at this higher level in a continuously filtered mode thereby adding additional protections for the workers and the environment while also allowing simultaneous activities to be conducted in the underground (i.e. mining and waste emplacement). With the addition of this new filter building, the underground ventilation system would obviously need to be updated. Further, with the change to the volatile organic compound monitoring program that was previously approved by the NMED – the current WIPP mine ventilation rate monitoring plan needs to be revised by allowing the removal of certain requirements that are no longer relevant. Lastly, assuming that the new filter building is allowed to move forward, there will be a significant portion of contaminated ducting and old ventilation equipment that will need to be disposed of inside the repository; therefore, the WIPP closure plan will need to be revised to allow for the inclusion of these contaminated components. It will be easier, cheaper, and safer to dispose of these items within the WIPP repository rather than to have the contractor pay an outside vendor to dispose of these items in an off-site (and most likely an out-of-state) location.

In summary, I am very versed in the proposed changes to the WIPP Hazardous Waste Facility Permit and I fully support each of the proposed changes as I believe they are drastically needed to restore the WIPP facility to its pre-February 14, 2014 level in a timely, cost-effective, and environmentally-protective manner. I hope the NMED concurs.

Feel free to contact me if you have any questions or need any additional information regarding this public comment.

Thanks,

Russell Hardy, Ph.D.
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