

ENTERED

DALE JANWAY
MAYOR



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STEVE MCUTCHEON
CITY ADMINISTRATOR

February 12, 2018

To: 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:

We appreciate the opportunity to comment on the proposed modification seeking clarification of transuranic (TRU) Mixed Waste Disposal Volume Reporting.

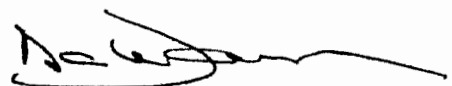
This proposed permit modification is easy to understand and is not technically complicated. It is simply a matter of using a common-sense dual approach to tabulating volume that addresses the issue of overpack containers. This PMR is appropriate as a Class 2 modification. Putting WIPP to its intended use, in the best way possible, is important to the nation and to the state.

This change will move WIPP's current LWA total from around 90,000 cubic meters of volume down to about 60,000 cubic meters.

It's also fair. WIPP uses overpack containers to package waste responsibly, sometimes because the original interior container is in poor condition. Counting the overpack volume against WIPP's total is effectively punishing the facility for being responsible.

We believe this proposed permit modification is sensible, reasonable and in the best interest of the project and the nation. Thank you for your consideration.

Sincerely,


Carlsbad Mayor Dale Janway

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