

From: [Maestas, Ricardo, NMENV](mailto:Ricardo.Maestas@state.nm.us)
To: [Biswell, David, NMENV](mailto:David.Biswell@state.nm.us)
Subject: FW: CCNS Public Comments - Proposed WIPP Expansion - Volume Reporting
Date: Tuesday, April 03, 2018 1:55:00 PM



From: Joni Arends [mailto:jarends@nuclearactive.org]
Sent: Tuesday, April 03, 2018 1:44 PM
To: Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>
Subject: CCNS Public Comments - Proposed WIPP Expansion - Volume Reporting

April 3, 2018

By email to: ricardo.maestas@state.nm.us

Mr. Ricardo Maestas
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive E, Building 1
Santa Fe, New Mexico 87505

Re: Public Comments about Proposed WIPP Expansion –“Volume Reporting”
Permit Modification Request - Changing the way waste is measured
Must be changed to Class 3 permit modification request

Dear Mr. Maestas:

Concerned Citizens for Nuclear Safety (CCNS), a 30-year old Santa Fe based non-governmental organization, is very concerned about the proposed expansion of the amount of waste in the Waste Isolation Pilot Plant – a proposed 28% increase – all by changing the way waste is measured.

The proposed increase of 930,000 cubic feet requires the New Mexico Environment Department to deny the request and require the Department of Energy and its contractor, Nuclear Waste Partnership, to resubmit their request as a Class 3 permit modification request. This is a significant volumetric change requiring more scrutiny by the public and the Environment Department. Alternatively, the Environment Department must determine that the request will follow Class 3 permit modification request procedures.

Over its 19 years of operations, DOE has shipped many empty (dunnage) drums, has not filled containers to capacity, yet the contractors have been paid fully – and in some cases with bonuses. To allow the proposed change, risks the health and environment for all New Mexicans.

Thank you for your careful consideration of CCNS's comments. Please use your regulatory power to deny the request or require the Class 3 permit modification request procedures, which include an opportunity for a public hearing as well as the opportunity to cross-examine sworn witnesses.

Sincerely,

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Joni Arends, Co-founder and Executive Director

Concerned Citizens for Nuclear Safety

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