

**From:** [Maestas, Ricardo, NMENV](mailto:Ricardo.Maestas@state.nm.us)  
**To:** [Biswell, David, NMENV](mailto:David.Biswell@state.nm.us); [Tellez, Hernesto, NMENV](mailto:Hernesto.Tellez@state.nm.us); [McLean, Megan, NMENV](mailto:Megan.McLean@state.nm.us)  
**Subject:** FW: CCNS Comments re: Class 3 PMR Modify Panel Closure Plan  
**Date:** Monday, April 23, 2018 11:44:50 AM

---



**From:** Joni Arends [mailto:jarends@nuclearactive.org]  
**Sent:** Monday, April 23, 2018 11:42 AM  
**To:** Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>  
**Subject:** CCNS Comments re: Class 3 PMR Modify Panel Closure Plan

April 23, 2018

Ricardo Maestas, WIPP Project Manager

Hazardous Waste Bureau

New Mexico Environment Department

2905 Rodeo Park Drive East, Building 1

Santa Fe, NM 87505-6303

Re: Public Comments in Response to Public Notice No. 18-01

Waste Isolation Pilot Plant - Class 3 Permit Modification Request to WIPP Panel Closure Plan

Dear Mr. Maestas:

Concerned Citizens for Nuclear Safety (CCNS), a Santa Fe-based non-governmental organization, makes the following public comments about the proposed Class 3 permit modification request (PMR) to modify the Waste Isolation Pilot Plant (WIPP) Panel Closure Plan. Our comments are brief due to the amount of time and resources devoted to the April 19, 2018 public hearing about the New Mexico Environment Department (NMED) draft groundwater discharge permit (DP-1132) for the Radioactive Liquid Waste Treatment Facility at Los Alamos National Laboratory.

CCNS requests negotiations between NMED, the Permittees, and interested parties about the PMR and, if necessary, a public hearing about this important PMR.

CCNS opposes the Class 3 permit modification request for the following reasons:

1. The proposed panel closure of a single bulkhead is not adequate;
2. Volatile Organic Compound (VOC) monitoring requirements in Panels 3 to 8 have been eliminated;
3. NMED has not explicitly prohibited waste emplacements in Panels 9 and 10;
4. NMED is changing the point of compliance for Panel Closure standards to the "nearest permanent resident," which first, sets a horrible precedent for a sparsely populated New Mexico; and is not adequately protective of human health and the environment.



Thank you for your careful consideration of our comments.

Sincerely,

Joni Arends, Executive Director

Concerned Citizens for Nuclear Safety

P. O. Box 31147

Santa Fe, NM 87594-1147

505 986-1973

[www.nuclearactive.org](http://www.nuclearactive.org)