



August 9 2018

By email to: [ricardo.maestas@state.nm.us](mailto: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"  
Draft Permit - Changing the way waste is measured

Dear Mr. Maestas:

My husband, Edward Scheps, and I oppose the expansion of the amount of waste disposed in the Waste Isolation Pilot Plant (WIPP) - a proposed 28% increase - all by changing the way waste is measured. I object to the proposed definitions for the *TRU Mixed Waste Volume* ("the gross internal volume of the outermost disposal container") and the *Land Withdrawal Act TRU Waste Volume* ("the volume of TRU waste inside a disposed container.")

Rather than increasing WIPP's capacity, the New Mexico Environment Department should deny the request because the Permittees (the Department of Energy (DOE) and its contractor, Nuclear Waste Partnership, LLC) have not explained why the expansion is needed and where the additional waste would be disposed. I am very concerned about the segmentation of the recent permit modification requests that do not allow the public to review the Permittees' entire expansion plan.

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 received bonuses. To allow the proposed expansion risks the health and environment for all New Mexicans.

Thank you for your careful consideration of my comments. We hope you will reject this plan.

Sincerely,

Cedar R. Koons, LCSW

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Dixon, New Mexico