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Ricardo Maestas, WIPP Project Manager
New Mexico Environment Department Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
E-mail: ricardo.maestas@state.nm.us

Subject: Comments on the proposed Draft WIPP Permit Issued August 6, 2018

Dear Mr. Maestas:

Thank you for offering this opportunity to comment on the draft permit NMED issued on August 6, 2018. This permit modification process is being conducted under the RCRA rules for a Class 3 change. However, this change does not affect the operation or use of the WIPP facility. It doesn't change the way waste is characterized under the rules of the waste analysis plan. It doesn't change the way waste is transported to WIPP, or how it is unloaded, or emplaced. This change is simply a bookkeeping change. In the first place, it should never have been elevated to a class 3 process. But now that NMED has elected to invest the time and energy for a class 3 process, it would be even more wasteful for the NMED Administrator to elect to invoke an optional public hearing as part of the class 3 process.

The NMED should simply issue the permit as drafted. NMED should avoid the time and cost to taxpayers to agonize through a public hearing, and waste a hearing officer's time over such a simple and obvious bookkeeping change. If NMED persists in holding a hearing, it must be held in Carlsbad, which is the only affected community by WIPP.

Sincerely,

Mayor Dale Janway

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