August 18, 2018

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:

I oppose the proposal to expand the amount of radioactive and hazardous waste allowed at the Waste Isolation Pilot Plant (WIPP) by approximately 30 percent. This proposal not only goes against the original intention of the regulation—by proposing a change in the way the waste is measured—but greatly increases the risk of harm to humans, animals, and the environment from the effects of radioactive and other hazardous materials now and in the future. 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.

Sincerely,

Dr. Rebecca Mueller
Dixon, NM
(505) 919-9634