



From: Maestas, Ricardo, NMENV
To: McLean, Megan, NMENV; Biswell, David, NMENV; Tellez, Hernesto, NMENV
Subject: FW: Public Comment on proposed "Volume Reporting" for WIPP
Date: Thursday, September 20, 2018 9:12:15 AM

From: Pelican Lee <pelicanlee4@gmail.com>
Sent: Wednesday, September 19, 2018 7:10 PM
To: Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>
Subject: Public Comment on proposed "Volume Reporting" for WIPP

September 19, 2018
Mr. Ricardo Maestas
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive E, Building 1
Santa Fe, New Mexico 87505

Dear Mr. Maestas:

I oppose the proposed new measurement of volume for waste disposed in the Waste Isolation Pilot Plant (WIPP). *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") would expand amount by 28% of waste allowed at WIPP.

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 that recent permit modification requests do not allow the public to review the Permittees' entire expansion plan.

Waste emplaced at WIPP has always been measured based on the volume of the container. Container volume is the way DOE has always reported to Congress how much waste is at WIPP. Container volume is how DOE contractors have been paid and received performance bonuses. Container volume is the way that the WIPP Permit and permits in other states calculate the amount of waste.

An unstated reason for the proposed measurement is that space for more than 1,000,000 cubic feet of waste has been forfeited or lost because of bad DOE management, poor contractor performance, and inefficiencies during the past 19 years of WIPP's operations. Because of poor planning and other inefficiencies, DOE has shipped and disposed of many empty containers and has not filled containers to capacity, yet the contractors have been paid fully – and in some cases received a bonus.

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

Thank you for your careful consideration of my comments.

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Sincerely,

Ellen Ackerman
PO Box 304
Ribera NM 87575