September 25, 2019

To: Ricardo Maestas  
New Mexico Environment Department  
Ricardo.Maestas@state.nm.us

Dear Mr. Maestas:

This is a letter in support of the Waste Isolation Pilot Plant’s Class 3 Permit Modification Request calling for the Excavation of a New Shaft and Associated Connecting Drifts. The NMED has been aware of this plan for a significant amount of time, due to its previous submission as a Determination of Class. We appreciate the Department of Energy’s Carlsbad Field Office and the New Mexico Environment Department for holding a public meeting in Carlsbad to discuss this PMR and are confident that all potential hearings related to this PMR be held in Carlsbad as well.

This proposed modification will allow for increased ventilation airflow into the underground and an unfiltered exhaust path through the existing Air Intake Shaft to allow the dust from mining to escape without compromising the HEPA filter system. This design will allow mining, maintenance and waste emplacement operations to all take place at the same time, which now must be segmented due very limited air flow. In short, adding the new shaft now will greatly enhance the air flow in the mine, and combined with the new Permanent Ventilation System under construction, will restore the WIPP underground to its pre-2014 condition. We believe WIPP’s PMR, as submitted, outlines numerous reasons as to why this improvement is advantageous to the facility and to the safety of the workforce.

While a WIPP PMR submittal must focus within the current boundaries of the permit, it is certainly appropriate for members of WIPP’s host community to also address the future. Make no mistake, the new shaft with the additional air flow is essential NOW to provide for the health and safety of our most important concern—the WIPP workers. It is naive for anyone to believe the new shaft does not provide access to excavation of additional panels in WIPP’s underground possible in the future. It should also be made clear that any future use of the shaft for future panels will have to also go through the additional permitting required by the permit for that expansion.
The new shaft is needed now for the health and safety of the workers, efficiency of operation and preservation of taxpayer’s money. A delay of the shaft now puts workers at unneeded risk and very simply adds to the cost of recovery when the shaft most assuredly must occur to fulfill WIPP’s mission. The budget is in place, the need is highly justified and there is no rational reason not to proceed. WIPP is a highly successful project that is meeting the goal of permanently disposing of defense-generated transuranic (TRU) waste from across the nation, including waste at Los Alamos National Laboratory. WIPP will require additional panel space in the future in order to continue meeting this goal. Recognizing that WIPP and its regulators are presently navigating a difficult timetable in terms of balancing regulatory approval, construction schedules, mining schedules and disposal schedules, we believe the public is best served by determined resolution of this important Class 3 Permit Modification request.

Thank you for this opportunity to submit a letter in support of WIPP’s Class 3 Permit Modification Request for the new shaft and connecting drifts.

Sincerely,

Carlsbad Mayor Dale Janway

John Heaton, Nuclear Task Force Chairman