



**Department of Energy**  
Carlsbad Field Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221



ENTAI50

OCT 16 2019

Mr. Ricardo Maestas, Manager  
Waste Isolation Pilot Plant Group  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303

Subject: Comment on the August 15, 2019, Class 3 Permit Modification Request entitled "Excavation of a New Shaft and Associated Connecting Drifts" for the Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number NM4890139088-TSDF

Reference: Permittees' Letter CBFO:OEP:MRB:SA:19-0241:UFC 5486.00 from Kirk D. Lachman, U.S. Department of Energy Carlsbad Field Office, and Bruce C. Covert, Nuclear Waste Partnership LLC, to John E. Kieling, Chief, Hazardous Waste Bureau, dated August 15, 2019, subject: Class 3 Permit Modification Request for the Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Number NM4890139088-TSDF and Notification of Withdrawal Regarding the December 22, 2017 Determination of Class.

Reference: Permittees Letter CBFO:OEP:MRB:AC:19-0210:UFC 5487.00 from Todd Shrader, U.S. Department of Energy Carlsbad Field Office, and Bruce C. Covert, Nuclear Waste Partnership LLC, to John E. Kieling, Chief, Hazardous Waste Bureau, dated March 4, 2019, subject: Response to the Referenced Information Request, Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number: NM4890139088-TSDF

Dear Mr. Maestas:

The purpose of this letter is to provide you with the enclosed comment on the August 15, 2019 Class 3 Permit Modification Request entitled "Excavation of a New Shaft and Associated Connecting Drifts" for the Waste Isolation Pilot Plant Hazardous Waste Facility Permit.

We certify under penalty of law that this document and all attachments were prepared under our direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



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Mr. Maestas

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If you have any questions, please contact Mr. Michael R. Brown at (575) 234-7476.



Kirk D. Lachman, Acting Manager  
Carlsbad Field Office

Sincerely,



Sean Dunagan, President and Project Manager  
Nuclear Waste Partnership LLC

Enclosure

cc: w/enclosure

D. Biswell, NMED           \*ED

J. Kieling, NMED           ED

M. McLean, NMED         ED

CBFO M&RC

\*ED denotes electronic distribution

**Comment on the August 15, 2019, Class 3 Permit  
Modification Request entitled  
“Excavation of a New Shaft and Associated  
Connecting Drifts”  
for the Waste Isolation Pilot Plant  
Hazardous Waste Facility Permit Number  
NM4890139088-TSDF**

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The Shaft #5 (S#5) design is one of two projects referred to as the Permanent Ventilation System upgrades needed to support on-going activities in the underground. Because of the ubiquitous nature of underground ventilation, S#5 and the connecting drifts in conjunction with the New Filter Building will be capable of supporting current underground activities by providing improved working conditions for underground workers as they perform mining, maintenance, closure, and waste handling and supporting future disposal units by providing the airflow needed to mine, maintain and subsequently emplace waste in new units. For additional information, please see the March 4, 2019 response to Question 8 of the *Response to the Referenced Information Request, Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number: NM4890139088-TSDF*.