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August 11, 1997

Kim McCauley  
Environmental Health Center  
A Division of The National Safety Council  
1025 Connecticut Ave NW, Suite 1200  
Washington, DC 20036

Dear Ms. McCauley:

RE: WIPP Reporter's Guide comments

Thank you for providing NMED a draft copy of the *Reporter's Guide to WIPP* for our review. These comments reflect my review of the document, and do not incorporate any comments that Bobby Lopez may have.

1. Page 6, "The WIPP Facility" - add language in the first paragraph indicating WIPP will also receive TRU mixed wastes. Unless using "radioactive" to help define "transuranic" (as on page 17), don't use them together (e.g., "... disposal of transuranic radioactive wastes"). In second paragraph, add the word "soils" to the first sentence. Change the second sentence to read "Only defense-related transuranic wastes are to go to the WIPP."
2. Page 8, second paragraph - "In September 1996, Congress amended the WIPP Land Withdrawal Act and the president signed into law the WIPP Land Withdrawal Act Amendments."
3. Page 8, last paragraph - although you mention it on page 28, it might be prudent to mention here the other hurdles DOE must overcome, namely, obtain a hazardous waste disposal permit from NMED; issue a Record of Decision on their Supplemental Environmental Impact Statement; and receive sufficient funding from Congress.
4. Page 11, top of page - "By 1988, seven of these rooms had been constructed. Construction of additional rooms will resume when the need arises."
5. Page 11, second paragraph - I may be splitting hairs, but WIPP does not intend to "characterize" any waste at the facility. This interpretation is based on the RCRA permit application submitted to NMED. If you have something else in mind, I recommend using a different word. Otherwise, eliminate "characterize" from this sentence.
6. Page 17, second paragraph - Add the word "soils" to the first sentence.
7. Page 22, last paragraph - "In 1991, the New Mexico State Highway Commission..."
8. Page 29, top of page - "... (NMED) must issue a disposal permit regulating the hazardous constituents in TRU mixed waste; DOE must..."

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9. Page 29, last paragraph - "... , NMED will issue a draft permit for public comment. NMED—also publishes public notices in newspapers of general and local circulation throughout New Mexico. It is likely that a public hearing will also be held to obtain input on the draft permit.
10. Page 32 - "... before NMED issues a renewal. Besides requiring DOE to perform environmental monitoring, NMED will also conduct regular inspections..."
11. Page 36 - "mixed waste. Radioactive waste that is co-contaminated with hazardous constituents defined under RCRA."
12. Page 38 - "transuranic (TRU) waste. Waste that generally consists of protective clothing, tools, glassware, equipment, soils, and sludge that have been contaminated..."

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You listed several items on your cover letter to us. The questions in number 2 (web site graphics, tables on pages 20 & 21) are more directly related to the WIPP Transportation Safety Program web site administered by the New Mexico Energy, Minerals, and Natural Resources Department. I believe I gave you Heidi Snow's phone number for further information.

The "additional resources" (Appendix A, Other Invited Contacts) list would be more helpful if you could somehow divide it into various categories. As it currently exists, I would have no idea what type of information any individual on this list could provide. I don't like to put labels on people or groups, but how about considering some of these?

- activists
- environmental
- public interest
- trade/industry
- oversight
- elected officials
- emergency response
- transportation
- public relations
- regulatory

or even the ones I hate, "proponent", "opponent", and "neutral"? Given a little more thought, I'm sure you could come up with a reasonable categorization scheme.

Upon reviewing your list of people, I believe it would be appropriate to add the NMED Communications Director as follows:

Nathan Wade  
Communications Director  
New Mexico Environment Department  
P.O. Box 26110  
Santa Fe, NM 87502-6110  
Phone: 505-827-2855  
Fax: 505-827-2836  
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Your list of suggested reading material and web sites appears fairly complete. NMED will probably post the draft RCRA permit to its departmental web site, but there is nothing of interest there now so I wouldn't mention it. Besides, it will undoubtedly be cross-referenced from both the DOE and the State's Transportation Safety pages.

Under the glossary, I suggest including a definition of *hazardous waste*. I know it isn't the main focus of EPA's concern (or the NAS, for that matter), but please include something simple like this:

**hazardous waste.** a solid waste which, because of its quantity, concentration, or characteristics may cause or increase mortality or serious illness, or pose a hazard to human health or the environment when improperly managed.

That's an abbreviated definition to which purists may object, but it conveys the essential information. The longer (and correct) definition is this:

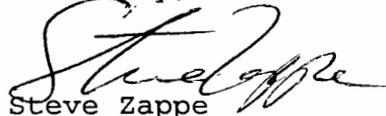
**hazardous waste.** a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may:

- 1) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible serious, illness or
- 2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

I'll leave it to you to select the one you believe is most appropriate for this guide.

I hope these comments help you edit and improve this guide. It looks like a very thorough treatment which will provide the media and others with accurate information about WIPP. Thanks again for allowing me to provide these comments. If you have any questions, call me at (505) 827-1561.

Sincerely,



Steve Zappe  
RCRA Permits Management Program  
Hazardous and Radioactive Materials Bureau

cc: Red WIPP '97