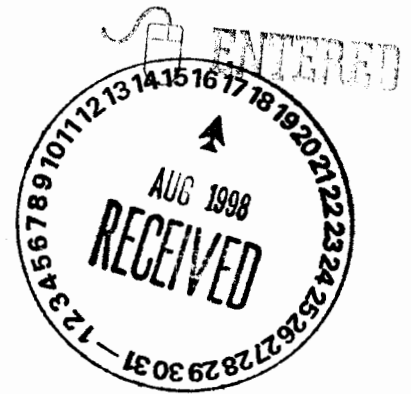




Department of Energy

Nevada Operations Office
P. O. Box 98518
Las Vegas, NV 89193-8518

AUG 14 1998



New Mexico Environmental Division
Hazardous and Radioactive Material Bureau
2044 Galesteo
Santa Fe, NM 87502

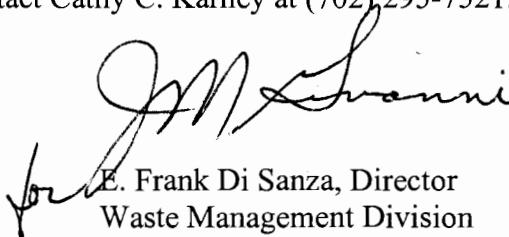
COMMENTS ON DRAFT RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PART B PERMIT

The Department of Energy/Nevada Operations Office (DOE/NV) would like to submit the following comment on the Draft RCRA Part B permit for the Waste Isolation Pilot Plant (WIPP) in Carlsbad, New Mexico. DOE/NV is committed to complying with all regulations and requirements in order to ship the transuranic waste currently stored at the Nevada Test Site to the WIPP.

Comment:

Module II - General Facility Conditions, Section II. B. 1 Off-site Wastes. This section contains a requirement for every site to submit a separate RCRA Part B permit modification to the secretary of the New Mexico Environmental Division (NMED). DOE Carlsbad Area Office (DOE/CAO) has a very involved and lengthy process to approve each sites' waste characterization program before the work can be completed. After receiving DOE/CAO approval and the waste is characterized, shipments to WIPP can begin. DOE/CAO is already partnering with the Environmental Protection Agency who participate in the site audits. Adding a step that requires the secretary of NMED to approve a permit modification to this process does not appear to have added value in increasing site safety or protection of human health or the environment.

If there are any questions, please contact Cathy C. Karney at (702) 295-7521.


E. Frank Di Sanza, Director
Waste Management Division

WMD:CCK

cc:
Denny Brown, DOE/CAO, Carlsbad, NM

980831





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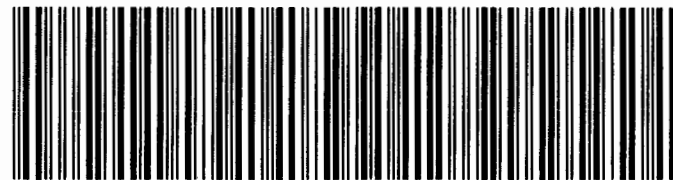
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