

January 29, 2018

Anthony Stone  
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VIA EMAIL to: [WIPP.EA@WIPP.ws](mailto:WIPP.EA@WIPP.ws)

Re: Public Comments about Draft Environmental Assessment - EA-2064  
*Above Ground Storage Capability Project at the Waste Isolation Pilot Plant*  
U.S. Department of Energy, Carlsbad Field Office, December 2017

Dear Mr. Stone:

I object to the plans of the Department of Energy (DOE), the Carlsbad Field Office (CBFO), and the Waste Isolation Pilot Plant (WIPP) and its contractors, to construct and operate an illegal surface storage area on the southern side of the WIPP Facility. Safe operations of the WIPP site and along the transportation routes should be the focus – not expansion.

My objections include:

1. I oppose this and other proposals, including:
  - a. Disposal of “surplus” plutonium from nuclear weapons;
  - b. Disposal of high-level radioactive waste stored at DOE’s Hanford, Savannah River, and Idaho sites;
  - c. Disposal of commercial radioactive “Greater-than-Class C (GTCC)” waste;
  - d. Disposal of commercial reprocessing waste from West Valley, New York; and
  - e. Storage of elemental mercury.
2. There is no need for an above ground storage facility.  
The proposed storage pad would increase the amount of waste on the surface by seven times and hold up to 65,280 cubic feet of plutonium-contaminated waste. The New Mexico Environment Department WIPP hazardous waste permit allows for above ground “surge” storage. “Surge” storage was only used following the February 2014 fire and explosion. Additional storage is not needed if there are no more accidents.
3. The draft environmental assessment does not comply with the basic requirements of the National Environmental Policy Act (NEPA). For example, DOE has not provided a complete analysis for the purpose and need, nor considered all reasonable alternatives.

In conclusion, the surface storage proposal must be abandoned. In the alternative, DOE must prepare a supplemental environmental impact statement for public review and comment.

Thank you for your careful consideration of my comments.

Sincerely,