



 ENTERED

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Dear Mr. Zappe;
Look, i've been loaned this new (to me) typewriter, but i don't know how it works yet, sorry if it's hard to read.

The headspace gas compositing proposal is about as vague as the word compositing. If one drum has dangerously high levels of, say, acetone, and its sample is mixed up with the samples of 19 other drums, how will the results of this be different from a sample where all 20 drums each have a smaller amount of the substance? One would think that the present method of individual samples would be more useful since it would provide accurate information on each drum for purposes of categorization and ~~the~~ inventory rather than some watered down composite of a ~~lot~~ batch of drums which will not even be shipped together. (Or will these 20 drums become a unit and rather than not shipping the one with high content, will all be refused??) What is the problem with the way things work now? If there is really a serious problem, perhaps there is a better solution, but knowing the results of the testing of each drum sample could be very important for health and safety. It is also valuable to see the variation in the results of each drum sampled and even when the waste streams are claimed to be homogenous, i'll bet that there is always some variation. What IF several of the drums in a batch of 20 have measurable amounts of incompatible headgases? Would this send up a red flag? Would they not each then need to be resampled individually? Would this not slow things down? Frankly i don't care how quickly the DOE sites are cleaned up as much as how well it is done and, for this comment, how well analyzed it is when it is shipped to WIPP. DOE's timetable is not the concern of NMEQ and should not be regarded as your issue.



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Once again, i believe that WIPP is a very dangerous design, in that the second, third, etc. rooms all have to pass the hopefully well sealed door of room #1. As i've heard that room two is now in use, one must wonder if room one is sealed off yet. Unfortunately, i can't get into the computer ~~computer~~ sounds more confusing than this electronic typer. But i can see that when the ceiling falls onto the waste in room #1, will be a critical time to make close observation, measure and do studies on the entire process and the best monitoring possible for the safety of the staff and employees. Does the permit say what will be done if something starts oozing out of room #1? Does NMED ever propose permit modifications, or is it only for DOE? It is so creepy that the film of the ceiling colapses in the test rooms is vanished, and this information is vital to safe operations in there.

I can understand and agree with the proposal to change the sampling methods, but am a little confused about not do visual inspections on drums of obviously questionable integrity. If the drums which are not safe to inspect are dealt with in some other way other than sending them off to WIPP, then it makes perfect sense because you can just sample the next one to see if it is equally too high in radiation. Would it not be wiser to determine the source of high radiation levels and if indeed it is compatible with the criteria rather than giving it a free ride. I do not mean to seem uncaring about the workers and believe that DOE can provide safe working conditions, at least according to their standards, at their production sites and should pony up and do the same for clean-up workers. I don't think it is safe to examine any of them, nor to work in any nuclear facility. But the issue of random sampling relates to the scientific integrity of the study. Like not looking at what you don't want to see, such as the most seriously damaged drums where once contained substances are mixing. Yes these are dangerous to inspect, but they are also dangerous to ship and handle and store and it is important to see the mix in mixed waste, And, how many new containers to "randomly inspect" can be rejected before alarms go off?

yours truly, bonnie bonneau