

CHARLES R. WILSON
Water Resources and Environmental Consultant

5 December 2003

New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Attn: John Kieling

Re: Public Notice No. 03-12

Dear Mr. Kieling:

I do not believe that your proposal to limit waste eligible for disposal at WIPP to the originally identified inventory is appropriate. As the Chairman of an independent peer review committee that reviewed the original WIPP performance assessment, I can attest that, contrary to what is said in your public notice, it was common knowledge at the time of the original permitting that there were many uncertainties concerning the waste inventory. It was understood that these uncertainties would be addressed by characterizing each waste stream prior to disposal and approving or disapproving that waste for disposal based on its own merits.

Many of the waste streams are old and the records are understandably incomplete. In addition, new waste streams may be identified that were not anticipated at the time of the original permitting. These wastes are dangerous and the WIPP repository is the safest place to put them. If the existing and proposed waste disposed at WIPP continues to comply with state and federal regulations, it is in the best interest of the people of New Mexico and the Nation to put that waste in WIPP, even if some of the waste is "new." If left elsewhere, the waste is subject to attack by both natural and human forces that could be disastrous. It is highly unwise to reject waste from WIPP that complies with all regulations simply because it was not identified at the beginning.

Sincerely,



Charles R. Wilson, P.E.

