SOUTHWEST RESEARCH AND INFORMATION CENTER
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June 22, 2026

Megan McLean, WIPP Program Manager via email: Megan.McLean@env.nm.gov
Hazardous Waste Bureau – NMED
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

RE: Class 2 Permit Modification Request

Dear Megan,

Southwest Research and Information Center ("SRIC"), which has been extensively involved in the WIPP Permitting process for more than 30 years, provides these comments on the Class 2 Permit Modification Request ("PMR"), submitted by the Permittees on April 21, 2026. [AR 260413].

The three areas of permit changes are generally justified as reducing "the Permittees' administrative burden" or as not being needed. SRIC is not opposed to reducing the Permittees (or NMED's) administrative burden, so long as public health and safety and basic regulatory requirements are being met.

SRIC does not oppose the PMR. However, pursuant to 20 NMAC 4.1.900 (incorporating 40 CFR 270.42(b)(6)(i)(A)) and its historic practices, NMED can approve the request with changes. SRIC requests that NMED change the dates for submission of the reports in Sections 5.10.2.1 and 5.10.2.2 from November 30 to May 31. Five months from the end of the calendar year is more than sufficient time for the Permittees to prepare and submit the reports, as they have been submitting the semi-annual reports by that date. The reduced administrative burden of one annual report rather than two reports is still achieved by changing the date, and the data for NMED and the public is submitted on a more timely basis.

Thank you very much for your careful consideration of, and your response to, these comments.

Sincerely,

Don Hancock