

County of Eddy

State of New Mexico



April 18, 2023

To: New Mexico Environment Department

Submitted online

RE: Communities around the country rely on WIPP, recognize its essential role in environmental cleanup, and strongly support a permit renewal aligned with WIPP's submission

On behalf of Eddy County, I write to express our strong support for the Waste Isolation Pilot Plant's (WIPP) critical mission and to encourage the NMED to support a permit renewal aligned with WIPP's original submission.

As the only operating geological repository in the U.S., WIPP is the single most important site for our cleanup mission, as well as for all communities that are part of nation's defense environmental cleanup mission.

Eddy County is a member of the Energy Communities Alliance (ECA), the nonprofit organization of local governments of frontline communities impacted by U.S. Department of Energy (DOE) cleanup activities. With our support, ECA has long recognized and supported WIPP's mission. In a 2014 letter to then Energy Secretary Ernest Moniz, ECA wrote:

“WIPP plays a critical role in the cleanup of our communities and the legacy of weapons production and research. Since it became operational in 1999, WIPP has set the standard for safe, permanent disposal of long-lived transuranic (TRU) radioactive defense wastes. The WIPP facility has assisted in the remediation of 22 DOE sites of legacy TRU waste since operations began. It is the only facility of its kind.”¹

These words remain true nearly a decade later. As discussed in ECA's recent waste disposal report, “WIPP is considered a success by DOE, the community and the states and communities that rely on the project among others. The process to design, open and operate the site is an international model.”¹ Without WIPP, frontline communities hosting federal cleanup sites may become *de facto* storage sites for the TRU waste created during the Cold War, as well as waste created at Los Alamos National Laboratory and Savannah River Site from preparation of surplus plutonium for disposal and fabrication of plutonium pits. Both are critical missions for our national security. These clear issues of environmental justice and security underscore the national importance of the State of New Mexico and the local community that hosts WIPP. Our community extends our gratitude and support to the State and community for the role they play in the cleanup of our community, and of all others that share a history of legacy waste.

¹<https://static1.squarespace.com/static/55c4c892e4b0d1ec35bc5efb/t/5669c015b204d54015ee7ef3/1449771029988/ECA+LETTER.pdf>

¹ Energy Communities Alliance. “Disposal Drives Cleanup: Re-Energizing Momentum for Disposal Solutions for Radioactive Waste.” February 2023. <https://www.enerevea.org/publications>.

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Our community extends our gratitude and support to the State and community for the role they play in the cleanup of our community, and of all others that share a history of legacy waste.

WIPP's safety record is widely known in our community and well documented. More than 20 years of scientific study, public input, and regulatory review occurred before operations even began at the site. Every five years, the U.S. Environmental Protection Agency (EPA) must determine whether it can recertify that WIPP complies with the disposal criteria. EPA also conducts inspections at the WIPP facility, as well as waste generator sites across the country. WIPP has complied with these rigorous standards for over 24 years.¹ Arguably the largest potential concern in WIPP's operational history – the radiation release event in 2014 – was managed safely and successfully, with EPA concluding that: 1) the radiation releases did not pose a public health concern, 2) DOE followed the procedures previously approved by EPA, and 3) the WIPP facility remained in compliance with EPA regulations.²

WIPP serves as *the* example of a successful transportation, emplacement, and management of nuclear waste. It is a model for DOE's efforts to develop consent-based siting for a consolidated interim storage facility and permanent geological repository. Federal, state, and local government officials and decisionmakers have remained engaged over the course of WIPP's history, and support from all levels has been strong.

WIPP is the linchpin for Eddy County's cleanup mission, as well as cleanup efforts across the weapons complex. The facility's mission is crucial, its success is a matter of record, and its continued operation – in alignment with the original submission – is *essential* if we are to move forward with cleaning up the complex and fulfilling the legal and moral obligations to this nation's frontline cleanup communities.

Sincerely,

A handwritten signature in black ink, appearing to read "Ernie Carlson". The signature is fluid and cursive, with a large initial "E" and "C".

Ernie Carlson
Chairman

¹ <https://www.epa.gov/radiation/what-wipp-and-how-epa-involved>

² <https://www.epa.gov/radiation/2014-radiological-event-wipp>