

## Sharon Howard

I strongly support the New Mexico Environment Department's Draft Permit proposing to require a minimum percentage of legacy shipments in the Waste Isolation Pilot Plant Hazardous Waste Facility Permit.

These proposed changes would require the Department of Energy to ensure that legacy transuranic waste shipments from Los Alamos are more than half (by volume) of the annual total legacy waste shipments from all other DOE sites. I strongly support these proposed changes.

I believe it will be possible to get the above-ground waste out by July 1, 2028, and I suggest January 1, 2029 as the required date to have completed this below-ground inventory.

I support the main proposed changes of the Draft Permit:

- From January 1, 2027 through December 31, 2031, at least 55% of the total volume of all waste emplaced at WIPP from all generator/storage sites must be LANL legacy waste.
- Beginning January 1, 2032, and until all LANL legacy waste has been emplaced at WIPP, LANL legacy waste must be at least 75% of the total volume of waste emplaced from all generator/storage sites.
- Legacy waste currently stored above-ground at LANL Material Disposal Area-G shall be shipped and emplaced at WIPP by July 1, 2028.
- If at any point any of those conditions are not met, all generator/storage site shipments (with the exception of LANL) must cease until all deficiencies are cured.
- An annual report, due by April 30 of each year, for each generator/storage site and for both legacy and non-legacy waste, shall detail information needed to demonstrate prioritization of LANL legacy waste and compliance with the requirements of this Permit section.