

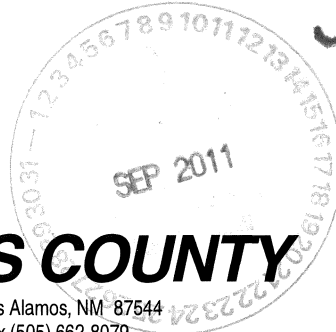
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LOS ALAMOS COUNTY

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September 1, 2011

Mr. John Kieling
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, NM 87505

Dear Mr. Kieling,

During our August 23, 2011 County Council meeting, our Council and the general public were briefed by a LANL representative regarding their request to the New Mexico Environment Department for a modification to their hazardous waste facility permit. The modification is needed to allow LANL to continue to conduct open detonations on laboratory property. I understand that your office is collecting public comments and would like to offer Los Alamos County's perspective on this subject.

The ability for LANL to conduct open detonations at TA-36 and TA-39 supports their national security mission for research and development of energetic materials technologies. They are using their expertise to train law enforcement personnel on how to safely deal with explosive devices threatening public safety in public areas such as airports. In addition, LANL staff are actively involved in trying to educate and protect our soldiers deployed overseas, teaching them how to detect improvised explosive devices and the facilities that manufacture them. There are benefits to both public safety and national security that are only made possible because of the use of open detonations on LANL property.

As the closest neighbor to LANL, we believe their operations benefit the nation and the world, and that the risks associated with their work are minimal. First, the detonations occur in remote areas of the laboratory such as Ancho Canyon - far away from the public. They have safely conducted these operations for decades, and in fact, have taken steps to reduce the number of detonations that occur in a year. Second, the requested permit modification would provide regulatory certainty for active explosives sites, while closing those sites that are used less. We support those actions and the accountability to NMED that be a direct result of a permit modification. Finally, we believe that LANL is acting responsibly to monitor environmental conditions at the sites and ensure that there are no adverse impacts to public health. While the detonations throw dust into the air, no emissions are detectable outside Lab property. LANL staff have kept the County involved and informed of their operations, with regular monthly staff

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meetings as well as quarterly Council meeting updates at public meetings that are televised and webcast. We have open lines of communications with Director McMillan's office, and are confident that, should questions arise regarding their activities, we would be welcome to meet with him to discuss our concerns.

In closing, we find that LANL has been, and will continue, to act responsibly when conducting their open detonation operations on their property. With our close proximity to LANL and their economic importance to our community, we would hope that your office will value our input and weigh it carefully against other public comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Sharon Stover", with a long horizontal flourish extending to the right.

Sharon Stover, Chair
Los Alamos County Council

SS:ms