Kieling, John, NMENV

From: Bart Olinger [bart.olinger@gmail.com]
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To: Kieling, John, NMENV; Sandra Powell
Subject: HE contaminated waste disposal at LANL

John Kieling, NMED

Los Alamos National Laboratory's work for the nation's security generates waste materials and items that must be disposed safely. These include high explosives (HE) or items containing HE residue. For years they have been safely treated by open burning in remote laboratory locations in accordance with applicable regulatory requirements.

Some 75 percent of this waste currently comes from research in counterterrorism, explosives detection, and improvised explosive device countermeasures. The remainder comes from stockpile research or from the decommissioning and demolition of buildings where explosive residues are too dangerous to transport. None of the HE waste treated by open burning at Los Alamos comes from the manufacture of nuclear weapons.

Burning in the Laboratory's secure, controlled, remote setting is far safer than transporting the material on public roadways to another facility. In fact, the U.S. Department of Transportation prohibits the transport of potentially unstable explosive waste on public roads.

Without open burning, this "orphaned" waste would remain dangerous and have no proper disposition path. Years of publicly available air monitoring data show that the Laboratory's burning poses no risk to human health. Open burning is primarily done with high-temperature propane burners, which produce no visible or harmful plume of smoke.

I respectfully disagree with the decision to remove open burning from the draft hazardous waste renewal permit. Vital national security work would be sacrificed with no appreciable benefits to human health or the environment.

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