



Kieling, John, NMENV

From: Sandra Powell [trailrunner87511@yahoo.com]
Sent: Saturday, March 27, 2010 9:45 AM
To: Kieling, John, NMENV
Subject: TA-16 Open Burn Permit

Mr. Kieling,

As a private citizen living and farming downwind of LANL near Velarde, New Mexico, I'd like to submit my opinion regarding the intended denial of the permit for Open Burn Units at Technical Area 16 at LANL. I have several concerns on this decision that involve both our country and our community.

I am intimately familiar with the work performed at the Open Burn Units at TA-16. I have managed them for the past five years. In that time, my team has received 3 Pollution Prevention Awards that are all related to the minimization of high explosive waste generation and treatment. We treat no waste that is radioactive or any waste that is generated from the production of nuclear weapons. Over 80% of the waste we treat is from the manufacture of high explosive components used in research and development experiments. These experiments are performed to learn more about the behavior of our explosives and those used by terrorists, how to detect explosives, how to disable weapons with explosives, how materials react to rapid deformation, and several other purposes that are not weapons-related.

We are constantly looking for better ways in which to manage our explosives waste. We have considered shipping such wastes offsite. Much of our explosives-contaminated waste already is shipped offsite. I have costed this option for other waste that can be transported on public roads and it would save us a considerable amount of money. The reason we haven't is that it goes against the basic principle of explosives safety: expose the minimum number of people to the minimum amount of explosives for the minimum amount of time. This cardinal rule would be violated by shipping our waste hundreds of miles on public roads through densely-populated areas to a facility that knows much less than we do about how to handle it. In my mind it would be irresponsible.

It also does not solve the problem of waste streams that cannot be shipped on public roads. I believe this list will be ever-growing as terrorist activities become more sophisticated. The explosives we work with are some of the most powerful explosives in the world. They must be placarded when transported so emergency response personnel can intelligently act in case of an emergency. This placard tells the world that that vehicle is carrying explosives, an easy target for any terrorist.

We also had an incinerator installed some years back, but had to remove it because the State would not permit it. It also does not solve the problem of decontaminating large pieces of equipment and other debris from decommissioned buildings. Being unable to treat such waste will cause buildings that have been deemed "cold and dark" to just sit there with explosives residue sitting in rotting pipes and drains indefinitely.

As far as my community, closure of these Open Burn Units could result in LANL losing valuable programs in global security, as we cannot produce waste that does not have a disposition pathway established. I heard one member of LANL state at a Chamber of Commerce meeting that this could result in the loss of tens or possibly hundreds of millions of dollars to LANL. Approximately half of LANL's budget is spent on employee wages. LANL does a wonderful job in placing personnel in other positions when programs are lost, but an impact of this size could not be absorbed. I believe it would mean the lay-off of hundreds of employees. Some of these people would be scientists and engineers that only exist here in northern New Mexico. These folks would likely follow the work, where ever it may go. Loss of programs also means closing of buildings and capabilities. This loss would most significantly affect maintenance personnel, custodial workers, facility personnel, administrative personnel, laboratory technicians, and other support staff, all of whom live in northern New Mexico.

As a farmer I am intimately aware of our environment and the consequences of mismanaging our resources. I would never live where I do if I thought that my family's health was in



any danger from what was happening "on the hill." It is true that past practices caused contamination at LANL. These practices were allowed to be performed because of ignorance of the consequences, different national priorities, changes in regulations and LANL policy, and an inability to predict the future. All of the area where these Open Burn Units are located has been used to burn high explosives and contaminated waste since at least 1951. We are learning the extent of that contamination from soil samples that we have recently taken. Part of the area has been cleaned. We are continuing our operations in the safest, most environmentally responsible manner that we believe possible, and would welcome constructive guidance from NMED on improving these practices.

I urge you to carefully consider the consequences of denying this open burn permit.

Sincerely,

Sandra Powell
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