

Kieling, John, NMENV

From: Scott A. Watson [scottw@lanl.gov]
Sent: Wednesday, March 17, 2010 12:01 PM
To: Kieling, John, NMENV
Subject: NMED Open Burn Permit For LANL (comment)

Mr. Kieling

It is my understanding that you are the State's Program Manager for open burn permits. In particular, I understand that NMED has indicated an initial desire to deny the long-standing burn permit capabilities at Los Alamos National Laboratory.

As a private citizen of the State of New Mexico, I'd like to submit a public comment on this proposed action. First, let me state that I've lived and worked in New Mexico for more than 40 years. I am very familiar with both the activities, the work involved, the benefits obtained for our Nation, and the scientific merit of work with explosives. I also have some professional background having served in Iraq in the search for WMD, studied at the New Mexico Institute of Mining and technology in explosive's engineering, and having worked as a scientific staff member in several of LANL's explosive testing groups since 1986.

The benefits of explosives work is widely underestimated by the general public and may not be apparent to regulators and State agencies. Even as our Nation struggles through two armed conflicts repleat with IED's and terrorist attacks where explosives are commonly used, it is easy to disregard the subtle nature of these chemicals and the fact that they are increasingly common. Even conceptually simple tasks, like explosive detection at airports, are repleat with subtle details and scientific and technological challenges. Nonetheless, for commertial air-traffic to continue, we must remain one step ahead of our enemies or accept the unacceptable consequences in lives lost.

Los Alamos scientists have genuinely world-class talents in the areas of explosive development, characterization, detection, and diagnostics. Many of these individuals have devoted their lives to understanding these complex phenomenon for the benefit of our society. Nonetheless, the nature of their work entails some element of risk, some waste streams and some political compromises with Government agents such as yourself. In the area of burning high-explosive waste, the cost is small and the direct benefit is large. Furthermore, these same scientists are fully aware of the environment we share and the consequences of mismanagement of environmental issues. I myself have participated in the remediation and cleanup of several firing sites. The Los Alamos scientific community is constantly searching for ways to make explosive tests smaller, with less impact on the environment. Significant advances have been made in the diagnosis of such tests - where more information is gathered on a given test thereby reducing the number of tests required. Other advances have been made in the use of containment vessels and blast-proof structures to prevent or mitigate the spread of debris. Recently, Los Alamos scientists developed "green" primary explosives dramatically reducing the amount of lead and mercury used in things like bullet primers. In short we are doing a good job at managing the risks associated with our work while returning enormous benefits to society. Those who will claim otherwise simply have not done their homework.

I urge you to carefully consider both the costs and the benefits before changing the NMED burn permit.

Sincerely,

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3/17/2010