

**Kieling, John, NMENV**

**From:** Leslie and Richard Hansen [spoticus@earthlink.net]  
**Sent:** Tuesday, April 06, 2010 8:27 PM  
**To:** Kieling, John, NMENV  
**Subject:** Comments on the LANL Hazardous Waste Facility Draft Permit

Dear Mr. Kieling:

I am submitting these comments about the intent to deny the permit for the open burn units TA-16-388 and TA-16-399 at Los Alamos National Laboratory.

I oppose denying the open burn permit for LANL. The open burn units serve a unique and irreplaceable function in ensuring the safe disposal of high explosives residues. These residues are an integral part of the national defense mission of LANL, and closing this waste disposal path would either stop completely or greatly increase the taxpayer cost of both important training and research operations and of decontamination, decommissioning, and demolition of old and unsafe structures at LANL.

In my opinion, NMED's justification for closing the units is inadequate and not defensible. Even the US Environmental Protection Agency, in their permit comments, only recommended suspension of the open burning units if the soils around the units were grossly contaminated. NMED's own analysis shows NO risk to public or worker safety from the continued operation of these units, and no gross contamination of the soil.

LANL has made extensive and ongoing efforts to reduce the quantity of waste that needs to be treated. The models and screening levels used for ecological risk estimation have not been validated in any real-world situation. There is no evidence presented by NMED of any actual harm to wildlife populations or individual animals. The area impacted by the open burn units is very small. Unless further evidence is presented that the open burn units are actually harming animals, further monitoring, and not closure of the units, is the appropriate response.

Thank you for this opportunity to comment.

Sincerely,

Leslie A. Hansen

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4/7/2010