



**Kieling, John, NMENV**

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**From:** David Mercer [d.j.mercer@earthlink.net]  
**Sent:** Sunday, March 28, 2010 12:20 AM  
**To:** Kieling, John, NMENV  
**Cc:** David Mercer  
**Subject:** Support Burn Permit

Mr. John E. Kieling, Program Manager  
New Mexico Environment Department  
Hazardous Waste Bureau  
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28 March 2010

I am writing to support continuation of the NMED permit to allow open burning of explosives waste at Los Alamos National Laboratory.

It is clear from the technical evidence made available that burning is a safe option for treatment of this material. The proposed limited operation causes no risk to humans and has negligible impact on the environment. The concern of ecological risk seems based on exaggerated factors, such as the assumption of 100% bioavailability of dioxins and furans, and is based on historical rather than current proposed operations. The area affected by historical use is extremely limited and could be cleaned or capped to make it less available to deer mice, earthworms, and shrews (if their health remains an issue). Concerns of any impact to allergy-sufferers in Santa Fe seem highly implausible.

LANL (along with Sandia National Laboratories) has been commissioned by the US government to develop methods to detect, identify, and defeat explosives threats. The research and training is essential for national security and for the safety of military personnel, civilian EOD teams, and all citizens. This work unavoidably produces wastes that must be disposed. Much of this work would become prohibitively expensive, or even impossible, if on-site burning of explosives is disallowed.

If burning is disallowed, then environmental cleanup of legacy wastes would also become much more expensive, and may require shipment of uncertain explosives on public roadways, which is a greater risk.

I encourage NMED to make a decision that is based on the technical merits and conscious of the important role New Mexico laboratories play in making the world a safer place. Good practices such as waste reduction should be encouraged; however, please allow the burning operations to continue as needed. The benefits greatly outweigh the risks.

David Mercer

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