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Mr. John E. Kieling, Program Manager
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505



Dear Mr. Kieling,

I was dismayed to hear that the current draft of the NMED hazardous waste permit seeks to exclude open burning of LANL's energetic materials. As you are aware, LANL burns explosive debris or residue at only a few remote Laboratory locations. Years of data collected during the burning has consistently shown that the activity poses no human health risks and emits no hazardous waste. The plume itself is rarely visible.

The other alternative to disposing of explosives debris is transporting the material on public roads for disposal elsewhere. This seems fundamentally wrong to me for three reasons. First, it exposes the public unnecessarily to detonation or contamination hazards in the event of a crash. The statistical likelihood of an event happening on this country's congested roads would seem to be far greater than the potential to endanger the public through the current method of disposal. Second, the risk for explosive material being diverted into the wrong hands increases whenever it is shipped for treatment off-site rather than being maintained and treated within the Lab's secure boundaries. And third, shifting the burden of disposal to another site only transfers the arguments against open burning at LANL to another physical space whose citizens may hold similar beliefs. In other words, the "problem" doesn't go away; it just becomes someone else's "problem".

Los Alamos National Laboratory has always played a critical role in this nation's national security and, in recent years, in counter-terrorism which may now be our biggest threat. Much of the research done at LANL requires the use of explosive material to understand and defeat explosive threats. If the Laboratory cannot continue to burn its explosive residue, mission-critical capabilities could be lost.

It seems to me that the people who support the removal of the open burn permit do not have a comprehensive understanding of exactly what they are supporting. As is often the case, people take this opportunity to voice their opinion against LANL without truly understanding the ramifications of their decisions.

Please allow the Laboratory to continue open burning of explosive material!

Sincerely,

Karen L. Thorn

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