



**Kieling, John, NMENV**

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**From:** Leonid Gershanok [leonid.gershanok@sfcc.edu]  
**Sent:** Saturday, April 17, 2010 6:44 AM  
**To:** Kieling, John, NMENV  
**Cc:** lorriel@lanl.gov  
**Subject:** FW: support for LANL permit  
Mr. Kieling,

Please enter my comment below into the hearing in support of LANL RCRA permit.

Sincerely,  
Leonid Gershanok  
cc: [lorriel@lanl.gov](mailto:lorriel@lanl.gov)

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**From:** Lorrie Bonds Lopez [mailto:lorriel@lanl.gov]  
**Sent:** Fri 4/16/2010 9:44 AM  
**To:** Leonid Gershanok; envoutreach@lanl.gov  
**Subject:** RE: support for LANL permit

Mr. Gershanok,

To enter this comment into the hearings on the LANL RCRA permit, please submit it to:

John E. Kieling, Program Manager  
Hazardous Waste Bureau - New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
Phone: (505) 476-6000  
E-mail: [john.kieling@state.nm.us](mailto:john.kieling@state.nm.us)  
Ref: LANL Draft Permit

Thank you for your interest,

Lorrie Bonds Lopez  
Communications, Outreach & Public Involvement  
505-667-0216

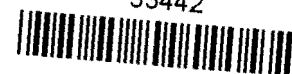
**From:** owner-envoutreach@maillist.lanl.gov [mailto:owner-envoutreach@maillist.lanl.gov] **On Behalf Of**  
Leonid Gershanok  
**Sent:** Friday, April 16, 2010 8:17 AM  
**To:** envoutreach@lanl.gov  
**Subject:** support for LANL permit

Please pass this on to your team in support of LANL permit

Sincerely,

Leonid (Leo)Gershanok

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Page 1

**COMMENT STARTS HERE:**

THIS REPORT CONTAINES SUPPORTIVE EVIDENCE FOR THE MOTION TO GRANT THE LANL THE FULL PERMIT FOR FULL OPEN BURN PROCEDURES FOR LOS ALAMOS FACILITY AND ALSO IS A MOTION TO INCLUDE ALL NECESSARY SUPPORTIVE PERMITS FOR STRUCURES AND PERMIT EXCLUSIONSION FOR LANL FACILITY.

April 16, 2010

Studies used as reference:

Environmental Health Perspectives Volume 59, pp. 121-128, 1985

Mechanisms of action of "Toxic" Halogenated Aromatics.

Biometry and Risk Assessment Program, National Institute of Environmental Health Sciences - National Institute of Health

Allison E.M. Vickers, Tracy C. Sloop, George W. Lucier

US Environmental Protection Agency, Health Effects Research Laboratory, N.Carolina

The Mechanism of Dioxin Toxicity: Relationship to Risk Assessment

Linda S. Birnbaum

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SUMMARY

Areas covered by this motion in support for the permit are:

1. Presented scientific report as evidence that shows no conclusive adverse effects on living organic tissue and no conclusive effects on ecosystems, may they be biotic or abiotic in nature.
2. Evidence of a fully biased stance by the New Mexico State Environment Department which is based on opinions and not validity of scientific proof. Also, NMED inability and choice not to fully understand and correctly interpret federal and state regulations to fully support this permit for LANL. Also the inability of the NMED to fully comply with their own local policies and regulatory duties in all of their oversight locally in public and private sector. In addition, NMED has historically abused their own policies and procedures for their own benefit as it comes to dealing with public (civic) regulatory requirements in areas of public, personal, private waste regulation, disposal monitoring.

Page 2

Section 1

Per these reports of two studies:

On mechanisms of action of TCDD, and related congeners, as possible unimportance in tissue toxicity and influence on cellular equilibrium and negative function in living tissues of organisms. Also the enzymatic induction of Dioxin metabolism and secretion points to the innate function of cellular of tissue. And on the use of TEF and TEQ as referencing questionable toxicity levels.

The role of Ah and Ah receptor as being significant is incorrect in the process of cellular wall transmission of TCDD into the cytoplasm of the cell. Although there are many nuclear and non-nuclear receptors inherent to the cellular structure and many might be participatory in various metabolic, synergetic and energetic processes native to living tissues, it's misleading to come to any conclusive interpretation that supports the toxic role of Dioxin and like compounds on having negative or detrimental effects on cellular function or on having or being responsible for disequilibrium in cellular function when

4/19/2010

referring to Dioxin and radiation.

In vivo studies, TCDD is considered 3-MC type inducer. It induces or activates cytochrome P1-450 and AHH activity, the two P1-450 and AHH are involved in metabolism and excretion of Dioxin, whether it is considered naturally occurring or not all living tissue. The study further states that these little known but innate abilities of tissue (living cells) are activated with higher concentrations of Dioxin like compounds and other compounds as well. These bio-transformational processes (Dioxin metabolism) seem to be inherent function in cellular structures. In addition, the additive measurements and approaches for toxicity might not apply as are defined in logical systematic approaches that TEF and TEQ systems are based on. Also the notion of toxicity might also be in question for Dioxin due to Dioxin being an important compound in the ecological and biological processes of ecosystems and living tissues.

## Section 2

Evidence of non-compliance by the public and private sectors with environmental regulations and laws in their daily lives and the unwillingness of NMED to inspect and inform the public of their responsibility to comply with laws of environmental standard as they apply to the public and private sectors.

## Page 3

Proof listed below is the non-compliance of regulatory oversight by NMED to contain the biggest source and cause of pollution of the environment and public health which is caused by the public and small businesses.

Facts:

NMED has been summoned to a hearing on April 13th, 2010 to take their responsibility for inability and unwillingness to monitor and secure NM Large Scale Dairy Facilities CAFOs, private farmers, from contaminating ground water aquifers and the environment in this state.

Recent case in Taos, New Mexico

Improper management and monitoring of Public Landfill in New Mexico and unwillingness to direct and monitor the public's and private use of Public Landfills, Taos, New Mexico.

Also

Case of needed regulation of oil and gas drilling and storing by NMED for New Mexico and out of state private companies, working in conjunction with Native Tribes on tribal lands to exploit the environment for mining operation granted by tribal governance in New Mexico, for tribal profiteering in mining here in New Mexico. Due to their toxic nature of these Chlorides producing mining processes used in mining, for extruding natural resources from earth for public use many tribal leader freely allow mining operations to take place disregarding the environment on their own accord on their lands for the sole purpose of profiteering and profit.

I doubt the Indians really care for New Mexico and the environment as they claim.