

Permit

 ENTERED

Kieling, John, NMENV

From: Douglas Tasker [doug_tasker@yahoo.com]
Sent: Monday, February 22, 2010 7:05 PM
To: Kieling, John, NMENV
Subject: The LANL explosive open burning permit

Mr. John E. Kieling, Program Manager,

New Mexico Environment Department

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505

Dear Mr. Kieling

I am very concerned about the unintended consequences of denying the Los Alamos National Laboratory (LANL) the permit to dispose of explosives by open burning. This decision will do *no* significant good for New Mexico but *will* do significant harm to this Nation.

LANL has been protecting the Nation from potential harm for more than 60 years. The potential harm originally came from the external forces of the German Third Reich and the Japanese military but now our Nation is threatened by terrorist elements both overseas and at home. The Laboratory employs some of the finest minds in the world to do cutting edge research to defeat those terrorist threats. It is no exaggeration to say that the denial of an open burning permit will bring that *vital* research to a halt. This will be a serious loss for our Nation and it will put our Nation at risk.

As an example, part of the LANL research is to acquire or replicate dangerous and unstable terrorist explosives. (Yes, all explosives are potentially dangerous, but explosives made by NATO forces for example are safe to ship and handle until correctly initiated.) These terrorist explosives are tested to determine how dangerous they are and how they may be rendered harmless. In other words, the Laboratory determines how to protect our troops in the field from



these explosives. The problem is that after these explosives have been tested they may not have detonated and must be safely disposed of.

The *only* safe way to dispose of unstable explosives is to use the open burning process. The Laboratory cannot and should not ship them out. This is because: shipment requires a permit from the Federal Department of Transportation (DOT), as these explosives are unsafe and unstable the DOT will rightly not grant permission to ship them on public roads to other sites; the explosives are unsafe to handle, packaging them for shipment puts LANL workers at risk. If the Laboratory cannot safely dispose of these explosives then the only responsible recourse is to stop performing research on them.

It is not well known by the public that explosive emissions from open burning are relatively harmless and their volume is a tiny fraction compared to other sources. Explosives are CHNO molecules, in other words hydrocarbons, much the same as gasoline. In fact, pound for pound there is more energy and waste in gasoline than there is in an explosive. I take good care of my car and I am pleased to say it gets 33 miles to the gallon. As I drive 25,000 miles a year I consume 758 gallons or over 2 tons of gasoline a year. *So, my car probably produces more waste than that produced by all the open explosive burning done each year at LANL.* Of course, there are hundreds of thousands of vehicles in the state of New Mexico producing comparable or more waste than mine. Clearly, if you took one of those vehicles off the road you would not notice the difference in pollution.

No one in New Mexico can possibly notice the improvement to the environment if the permit for open burning of explosives is denied. *The whole Nation will notice if the Laboratory cannot protect it!*

I strongly urge the New Mexico Environment Department to reconsider the denial of a permit to dispose of explosives by open burning and let the Los Alamos National Laboratory do its job.

Respectfully

2/24/2010

Douglas G. Tasker, PhD

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