



Kieling, John, NMENV

From: theblumenthals@comcast.net
Sent: Wednesday, February 24, 2010 10:14 AM
To: Kieling, John, NMENV
Subject: LANL Draft Hazardous Waste Renewal Permit

Dear Mr. Kieling,

I am writing as a citizen of New Mexico and a resident of Los Alamos to express my opposition to the draft Los Alamos National Laboratory (LANL) Hazardous Waste Permit Renewal released earlier this month by the New Mexico Environment Department (NMED) that will prevent LANL from open burning of high explosive (HE) waste that do NOT come from nuclear weapons manufacturing.

This decision by the NMED must be reversed because:

- 1) Burning HE and HE-containing items in a controlled, remote part of LANL is far safer than requiring additional handling and shipping of these these materials to another site. In fact, it creates a new more dangerous problem: the transport of potentially unstable explosive waste on public roads which is prohibited by the U.S. Department of Transportation regulations.
- 2) Obviously a small amount of air pollution and combustion residues are created, but these are insignificant in my opinion and should poses no significant danger to the public, LANL workers, or the environment.
- 3) This decision would prevent or curtail most important defense and national security missions involving HE, such as research into weapons and munitions, counter-terrorism, explosives detection, and improvised explosive device counter-measures.
- 4) This method of waste disposal is not new and has been safely used for many years in accordance with applicable regulatory requirements.

I am currently an employee of LANL and I have many years of experience researching the mechanical properties high explosives; however I am expressing my own views and I am NOT representing the Laboratory.

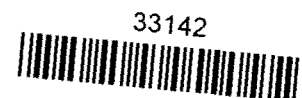
In summary, explosive residues are too dangerous to transport and are far safer to burn on-site. A simple consideration of environmental risks compared to the benefits to national security are clear in this approach.

Thank you for your consideration of my opinions on this matter and please contact me if you need further clarification:

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