

Comments on LANL open-burning permit
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by John Bartlit

I am a chemical engineer retired from Los Alamos National Laboratory (LANL). For 41 years, I have also been a volunteer public advocate for a healthy environment. My years of volunteer work include testifying and cross-examining at numerous regulatory hearings, participating in public projects of the NMED and others, and writing a regular environmental column in the Los Alamos Monitor since 1971.

From this background, I submit comments on the issue of open-burning of high explosives at LANL. The comments are consistent with my long-standing approach to making environmental progress. They apply equally to open-burning for disposing of high explosives and open-burning for training non-nuclear bomb technicians.

The propositions I have used to help bring large and long-lasting environmental gains rest on certain principles. My criteria are: (1) apply the best technology to minimize pollution that is consistent with sound economics and (2) weigh the total degradation of the environment that results from each alternative proposal. In short, the best solutions work from more than a piece.

These principles raise two specific questions in the issue of open-burning at LANL:

- Is stopping the open-burning a sound use of pollution control expenditures?
- How much total degradation of the environment results from each alternative proposed?

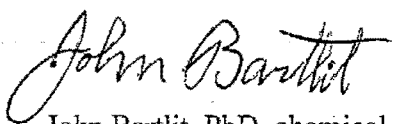
I assume "stopping" the open-burning will result in trucking the high explosives to another state to be burned or disposed of in some way, or will result in building a structure here of sufficient dimensions to continue the work here.

I do not have the information required to sum up answers to the key questions. The NMED has much more of the relevant information.

To my long-tested way of thinking, it is important to use the best available information that answers the questions. Not to do so weakens the fabric of regulation itself and diminishes the sum of public support for regulation. I believe in regulation and I actively support its effective and efficient use. In the long run, maintaining public support for sound regulation is vital.

My comments are not answers, but guidance. My aim is to broaden the assessment enough to gain the best long-lasting results for the environment.

Thank you for considering my comments and perspectives.



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