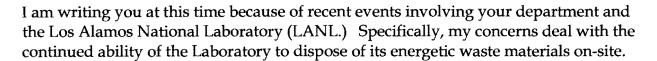
Lt Col Roger H. Goldie, USAFR Explosives Safety Engineer 1975 Camino Durasnilla Los Alamos, NM 87544

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 understand there are a number of related health and environmental considerations to be addressed within the framework of the permitting process, but I wanted to restrict my comments to the safety aspects because that is where my area of expertise lies. For over forty years, my career has directly involved me in work with explosives, munitions, and explosives safety for both the Department of Defense (DoD) and the Department of Energy (DOE.)

The practice of packing and shipping energetic waste materials off-site for treatment that can be accomplished at their point of origin (i.e. LANL) flies in the face of the Cardinal Principal of Explosives Safety as accepted by DOE, DoD, and any agency handling explosives or energetic materials, to wit:

Expose the minimum number of people to the minimum amount of explosives for the minimum amount of time.

Los Alamos is well positioned to safely and efficiently treat explosives waste materials generated on-site. Transporting these materials to an off-site location will involve additional packaging and handling operations as well as subjecting the energetic materials and those individuals sharing the highways and surrounding communities to the risk of exposure to an explosives accident. Such accidents can, and have, happened. (Reference: "Collision Between a Tractor-semitrailer Transporting Bombs and an Automobile, Resulting in Fire and Explosiions. Checotah, Oklahoma, August 4, 1985" NTSB Number: SIR-87-01. Note this accident was caused by the driver of the automobile not the truck involved.)

April 2010

In addition to its traditional activities in support of Congressionally mandated national defense programs, Los Alamos has been assigned an increasingly significant role in support of the nation's homeland security and counter-terrorism programs. Many Laboratory activities in support of these programs generate explosives waste products and require the ability to treat this waste in a safe, efficient, and environmentally responsible manner. As noted above, transport of this waste to an off-site location may not always be feasible and is often not the safest alternative. The loss of the capability to accomplish this treatment at Los Alamos can place nationally important programs at risk, jeopardizing the future of the Laboratory and the economic vitality of Northern New Mexico.

Sincerely,

Roger H. Goldie

Frank Golder