

Roberts, Kathryn, NMENV

From: Kim Granzow [kgranzow@lanl.gov]
Sent: Wednesday, February 24, 2010 6:58 AM
To: Roberts, Kathryn, NMENV
Subject: FYI

Hazardous waste decision could affect important national security missions

Public comment period gives all citizens an opportunity to comment

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LANL's research on explosive materials is important to national security and the safety of troops overseas.

I'd like to update you on the Lab's latest efforts to renew its hazardous waste permit from the state of New Mexico for the storage and treatment of waste.

The permit is aimed at protecting the public, workers, and the environment while continuing the Lab's ability to accomplish important national security missions.

However, in a draft released earlier this month, the New Mexico Environment Department (NMED) denied a portion of the permit that would affect these important missions.

Counter-terrorism and explosives detection

33271



Some LANL missions generate waste materials and items that must be dispositioned safely. These include high explosives (HE) or items containing HE residue. For years they have been safely treated by open burning in remote Lab locations in accordance with applicable regulatory requirements.

Some 75 percent of this waste currently comes from research in counterterrorism, explosives detection, and improvised explosive device countermeasures. The remainder comes from stockpile research or from the decommissioning and demolition of buildings where explosive residues are too dangerous to transport.

None of the HE waste treated by open burning at LANL comes from the manufacture of nuclear weapons.

Safer than transportation

Burning in LANL's secure, controlled, remote setting is far safer than transporting the material on public roadways to another facility. In fact, the U.S. Department of Transportation prohibits the transport of potentially unstable explosive waste on public roads.

Without open burning, this "orphaned" waste would remain dangerous and have no proper disposition path.

Years of publicly available air monitoring data show that LANL's burning poses no risk to human health. Open burning is primarily done with high-temperature propane burners, which produce no visible or harmful plume of smoke.

LANL respectfully disagrees with the decision to remove open burning from the draft hazardous waste renewal permit. Vital national security work would be sacrificed with no appreciable benefits to human health or the environment.

If you choose to participate

All citizens of New Mexico have the right to submit comments as this process continues.

- The fact that you work at LANL does not prevent you from participating as a private citizen in the permit renewal process.

- You should make clear that you are expressing your own views in your comment and are not representing the Laboratory.>/p>

You may submit comments by e-mail or in writing from your home computer or address to:

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

E-mail: john.kieling@state.nm.us

You may also choose to comment in person at the hearing scheduled to begin in April. During the hearing, time will be set aside for receiving public comment at locations in Los Alamos, Pojoaque, and Espanola. Watch LANLtoday or the NMED Web site at <http://www.nmenv.state.nm.us/hwb/lanlperm.html> for specific times and locations.

We look forward to ongoing discussions with the state and interested stakeholders to resolve this and other important permit issues.

Denny Hjeresen, Environmental Protection Division Leader

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