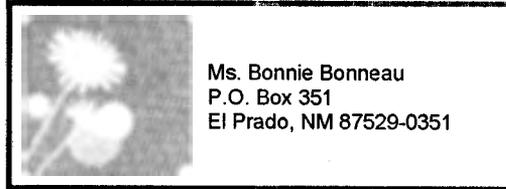


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November 25, 2013



DEC 3 2013

NMED
Hazardous Waste Bureau

Hello Mr. Cobrain;

re:Open Burning Permit @TA-16

Many people hoped to attend your June 6th Public Information Meeting, but there were terrible ~~air~~ air quality issues as well as public safety issues because of a large wildfire in your forest. From the looks of the attendance sheet, only two members of the public managed the trip. I, and others from my carpool called Lorie Bonds Lopez asking her to reschedule so we, the public, could safely attend. These calls ~~got~~ got no ~~response~~ response either then or in the record of public comments. I assume the folks from the neighboring Pueblos were busy working to keep the fires from their homes, livestock, and family. It was a very bad time to hold a meeting if you wanted the public to participate. The October 30th meeting was on the night of a splendid snowfall which further limited public participation.

It took over two weeks to get a copy of the permit, which I received today, with only four days to study and write useful comments.

I believe that this matter deserves more serious study and should include an Environmental Analysis (EA). The suggestion that ash does not float more than 400 feet from a fire can be easily refuted by the smoke that fills the air over several states when these wildfires explode. In fact the Jemez volcano sent a one inch layer of ash all the way to Iowa (or where Iowa is now). The air here in Taos County has even been thick with dust from storms in the Gobi desert in Asia. The wind blows forever.

The air quality in Taos was so bad on June 6, that senior citizens ~~were~~ were advised to stay indoors, and so we are not permitted to comment on air quality issues which impact us most seriously. The alternative of a closed ~~burning~~ burning unit could be safer and needs serious consideration. One cannot quite grasp the idea of living in a national Sacrifice Zone, but it must mean that we are all "lab rats" and as long as the wind blows the toxins away from their makers, the nation is secure, but the people of New Mexico are not.

This document seems to be missing a true description of TA-16.



TA-16 has long been a site for testing and test manufacturing of warhead systems including high explosives, plastics and adhesives. Now it is the location ~~for high explosives~~ of the ~~War~~ Weapons Engineering Tritium Facility, a state-of-the-art tritium processing facility. It is also the location for high explosives research, development and testing and the High Explosives Wastewater Treatment Facility. Add to these the Homemade Explosives Training Courses, and it would be appropriate if the maps designated each activity, and any others in that area. It sounds like you are happily making more bombs with less waste. Is this true? Do the Homemade Explosives folks get to use the explosives machining gizmos and other Lab equipment?

The term U.S. War Fighters is new to me. Are you referring to military personell or private contractors? Do they learn to make explosives, I think Lorrie said that but do not see it in the slide show. Do they train at the Flash Pad? I think she inferred that. If they are military, would it not be far more appropriate to train at a military site rather than a High Security Lab with nuclear weapons, biologic agents, and all your fun toys? If they are mercenaries how are they or the ~~others~~ others screened, surveilled, monitored and followed up on?

Once I was nearly killed by an FBI man/ Green Beret vet who who had asked me to wake him at dawn and jumped up in full combat mode. The trainees may be as unstable as the materials they are working with. Blackwater would consider breaching Lab security a necessary challenge. Though this is not the subject of the permit modification, ~~yet~~ it is a part of it that has been made public. ~~Seems to represent a lack of good judgement.~~ why? Since most of what i pretend to know about homemade bombs comes from network TV it is probably a bit exaggerated, but they like to add elements like serin, anthrax, risan(?) or nuclear elements to make the "dirty Bomb". Will your students have access and training with these? If they are not presently part of the training course, they may be added. How do they handle that kind of waste??

It appears that the sewer system will ~~allow~~ permit access to almost everywhere in the Lab and with the skills the "war fighters" possess, one shudders to imagine a worse senerio.

Does ~~it~~ "Operating under interium status - safely" mean that this unit is presently in operation, and that such practices ~~are~~ ^{can be} added as experiments to determine how to get results below "detection levels"? And if biologic or nuclear elements are added, they too will be on interum status, ⁱⁿ the need to ~~know~~ national security versus sacrafice zone showdown?

Are American Allies scheduled to participate in bomb ^{HME}camp? Is TA-16 where the Howitzer was invented? Are there munitiuns test ranges there with unexploded ordinance?

As the concerned public this all seems so pushed through and not proposed a serious question about the outcome. ~~The~~ demension of time is something that Los Alamos refuses to take seriously. Home of top secret clandestine ~~or~~ operations, can bomb camp be any different? Will ^{they} ~~the~~ tell you what ~~is~~ is being burned if and whenever black ops. rubbish or wastewater is being disposed?

The paradox of time is also that these 60 days of routine operating procedure for the administration will have a cumucltive impact somewhere downwind or downstream. How long it may take for minute deposits to accumulate may be difficult to estimate, but are going to be unavoidable and probably irreparable.

The people of the Pueblos, your neighbors, grow and eat much of their own food. They hunt the wildlife and collect pinion nuts. People at Los Alamos who provide environmental information are smooth at public relations and keep a tight control, encouraging their speakers to prattle on and restricting public riight to finish our own prattelings. It is intimidat^{ing} and inconvenient for the public and extra overtime pay to say that the person who can answer that question is not here. When the Lab does stats, on birds, is it understood that the "kiva boys" include them ^{birds} in the diet? Boys at Taos Pueblo do.

Which brings us to tritium: Tritium is used for triggers of nuclear weapons. It is a Hydrogen isotope with the ability to bond with oxygen to form tritated water, which can be metabolized and incorporated into body fluids and tissues. There ^{are} probably still long tritium plumes in the ground below Area G and i question ^{is} (notion that it) will not have its impact. Not in slide 19.

Lorraine B. Lewis saying Tritium, as water or unstable hydrogen

Tritium has a half-life of 12.3 years, approx. That means that half of it becomes stable in that amount of time. In another 12.3 years another half will stabilize, and theoretically ad infinitum, as with all other half-life numbers. Calling the post dated half-lives "background" radiation, rather than "legacy" is a misnomer. Pre-Manhattan Project times are where true background can be found. With winds and weather events they are scattering, but the decomposition times remain constant as releases accumulate daily from the sites that produce this waste which requires incineration, or detonation. How much tritium escapes as gaseous molecules?

Exactly why was the Weapons Engineering Tritium Facility not mentioned in documentation? I was most concerned about the burning of materials like their machining waste, but that was before hearing of bomb camp. WOW!

Their brochure needs a disclaimer. "Danger: Bomb Making may be habit forming, perhaps addictive. It can also be hazardous to your health and health of those around you." As long as the winds blow and waters flow. They should post it as a motto at the tritium and the new ~~CMR~~ CMR, probably each entrance to the gated top secret zones. There must be better way to find peace, how insecure can a nation be? Is it great, or beyond marginally unstable? I know, write to Washington.

Detonation must be defined as blowing up explosives. If 80% of the burns are machine waste, are 20 % other wastes? Does this compose the once a week burns and then another one detonation per average month? Are these the figures from interim use of the Flash Pad, or from the Burn Tray or from the two together?

Does "50 burns last year" refer to all burns and detonations fired at the entire total LANL Facility? If the Flash Pad has been operating in interim status and the Burn Tray is decommissioned, how does the frequency maintenance or rotation plan work and what will Plan B be? Is a new incineration plan in the works, to be tested and used before the permit?

How is the residue signature of the Flash Pad isolated from that of HME or other TA-16 detonations?

It is illegal to lie to the government, but it is not illegal for the government to lie to the people. Police are encouraged to lie to folks they want confessions from on the local level, due to National Security, covert ops. are being orchestrated, perhaps even at TA-16 weapons engineering sites. Cover ups and covert ops. sound alot alike. What can you tell us about what goes on at TA-16, and how this relates to the Permit Modification Request?

Even though the State cannot regulate radioactive waste, the people have the right to know about all elements to be treated through open burning methods. Are there other Flash Pad facilities at LANL, where are they and what do they burn? Is this new technology? Can it be used to heat and evaporate cauldrons of tritiated water, or will it explode at a critical concentration? Can it be used for weapons research and development, using the convenient ploy of clean-up of an "accidental" spill?

How much access does NMED have to LANL? With the gates and guards there can be no more ^{surprise} surprise inspections. How can a small state agency keep tabs on such a large operation? What are the procedures and protocol with other burning units? It is rumored that the health and well-being of New Mexicans is not as important as national security, and that this is a National Sacrifice Zone, can this be true??

Will the Labs be able to schedule burning in conjunction with times the winds are blowing away from their own elite community and toward their poorer neighbors? Do you test for tritium in the soil, water, produce... of these traditional folks?

In the spirit of Thanksgiving, which it is while i type, please be conscientious, responsible and honest when dealing with your neighbors and the earth, the environment. The past cannot be changed and much of the cumulative impact is moving through one half-life or another. I would be thankful if you could see the whole life. The living earth that has been so blessed and is so precious, needs nurturing and a gentle touch. If killing people or land could solve world problems, the place would not be such a mess. Consider alternatives of philosophy like "do unto others" or live and let live, may be worth a try?

Open Burning

Why would closed incineration always have to be more dangerous, or are just the models you have on hand a bit out of date? I see the Rotary Kiln in a 1977 Pollution Technology Review. It also details a Controlled Air Incinerator (LASL), Excess Air (Cyclone) Incinerator (Mound Lab), Pyrolysis-Incinerator (PNL), Vortex Incinerator (GE), Fluid Bed Incinerator (Rocky Flats), Agitating Hearth Incinerator (Rocky Flats), Moving Belt Incinerator (ARHCO), Acid Digestion Unit and Molten Salt Combustion Unit (Atomics International). Is the Rotary Kiln in your document alot like the one at Rocky Flats in 1977? Yes, it may be dangerous, but is there not more, better, safer technology that employs the best ideas, like afterburners and off gas treatment and collection of ash? There are several other open burning units around TA-16 which are not in service. Do folks keep data on what worked best on the various types?

Because certain waste requires open air, or not in small space detonation, does not mean that most of the waste would present less danger if properly contained. Perhaps they should be proposed and developed the two at separate sites?

The maps of TA-16 are difficult to navigate. Page 3-55 shows K Site Rd and Ancor Ranch Rd, Figure 6-1 shows Burning Ground Rd, HE Rd and 340 LP. Figure 3-5 seems to have the information, but it is tiny small print and much of the ink is too blurred to be ledigable. A careful and clear copy of Figure 3-5 with all structures identified, would make commenting on the issue easier. In one corner i make out a ² mile long magazine loop, in the other "Plastics Rd". Which one is Tritium, Explosive Wastewater, Homemade Bomb Camp and what else is happening that might be impacted if something goes wrong at a Flash Pad detonation or burn? Consider the effects of the detonationations on the war fighters with PTSD. Also consider the firings and test firings as a large oxygen consuming combustion at a high altitude where the element is light. The cumulative impact of detonations must impact air quality, like kicking up dust, ash and residue? So many questions and so little time. Please do a more expansive analysis of TA-16 and the Flash Pad. Thanks, hope you can read it,

bonnie bonneau *Bonnie Bonneau*