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Allen, Pam, NMENV

From: Cobrain, Dave, NMENV
Sent: Tuesday, December 10, 2013 11:30 AM
To: Allen, Pam, NMENV
Subject: FW: Comments on the Open Burn Permit for TA-16-388 at LANL

Pam,

Another 16-388 comment. These comments are related to LANL's public notice of the permit mod request.

Dave

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From: Cobrain, Dave, NMENV
Sent: Monday, December 02, 2013 4:53 PM
To: Hall, Timothy, NMENV; Briley, Siona, NMENV
Subject: FW: Comments on the Open Burn Permit for TA-16-388 at LANL

16-388 flash pad comment.

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From: John Ahlquist [<mailto:john.ahlquist@sbcglobal.net>]
Sent: Monday, December 02, 2013 4:03 PM
To: Cobrain, Dave, NMENV
Subject: Comments on the Open Burn Permit for TA-16-388 at LANL

Mr. Dave Cobrain
NMED - Hazardous Waste Bureau
2905 Rodeo Park Dr. East; Building 1
Santa Fe, NM 87505

Dear Mr. Cobrain:

As a former member of the Department of Energy Explosives Safety Committee and having watched an open burn of explosive waste at TA-16-388 at the Los Alamos National Laboratory, I am writing in support of issuing the hazardous waste permit modification to continue to allow open burning of high explosive waste there. Open burning is the safest and most environmentally friendly way to treat the various streams of explosive wastes generated at LANL. Local burning eliminates the need to package and transport such waste to other facilities where it would likely be burned in the open. Alternative treatment technologies, such



as confined burns, are not sufficient to treat all the waste streams that occur and increase risk because of the need for increased handling and packaging.

The permit should include requirements that the handlers and operators are sufficiently trained and that weather, timing, and wild animal control are accounted for in the burn protocols. Additionally, the permit should require that the equipment and control systems be in excellent condition with sufficient backup and spare parts available to conduct a first class operation.

It only makes sense to permit a process that is the safest, most efficient and most environmentally friendly treatment of explosive wastes.

With appropriate controls in the permit, it should be issued without reservation. I urge NMED to move out smartly and issue the permit within the next few months.

Thank you for the opportunity to comment.

A. John Ahlquist
1625 Geary Rd
Walnut Creek, CA 94597