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**Kieling, John, NMENV**

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**From:** John Ahlquist [john.ahlquist@sbcglobal.net]  
**Sent:** Friday, September 16, 2011 8:53 PM  
**To:** Kieling, John, NMENV  
**Subject:** Comments on the LANL permit modification for open detonation of explosives waste

Dear Mr. Keiling:

My comments on the Los Alamos National Laboratory [LANL] permit modification request for open detonation units are provided below.

Also, to ensure a place at the table, I would like to formally request a public hearing on this matter.

A. John Ahlquist

Walnut Creek, CA

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I pollute therefore I exist. This play on an old philosophical question reminds us that everything lives at the expense of its environment. As responsible human beings, our job is to strike the right balance between having a modern industrial society and at the same time ensuring safety and going easy on our environment. With this in mind, is approval of LANL request to perform open detonation for treatment of explosive waste the right thing to do? The answer is an unqualified "Yes."

LANL is doing important explosives research in a number of areas:

- Basic research
- Nuclear stockpile safety
- Counter-terrorism
- Improvised Explosive Device identification and defeat



- Improved detection technology

As mentioned in the first statement, these operations will develop some waste that needs to be treated.

Can it be done safely? LANL staff has many decades of experience in treating this kind of waste and has done it safely. The key to safety is to minimize volume and the handling and steps required to do the treatment. These criteria make on-site open detonation the treatment of choice.

Is LANL reducing the amounts to be treated? In 2010, the amounts treated at LANL were about 25% of the amount treated in 2006. LANL is also a winner of Pollution Prevention Awards for its preparation of explosives by using fewer solvents and creating less waste.

Will open detonation harm the environment? No! Using strongly biased treatment protocols to maximize the pollutants emitted in a short time, modeling results were still many orders of magnitude below screening levels [both human and ecological] for air concentrations and soil deposition. Any efforts, such as contained burning or detonation, to reduce airborne emissions below these already inconsequential values would be a waste of time and money and would increase worker risk from additional handling of materials.

The annual amount of material to be treated and the types of pollutants therefrom are likely much less than several days of fireworks at places like Disney Land, Disney World, and Sea World which have fireworks nightly. LANL's annual emissions would not even come close to the Capitol Fourth fireworks display in Washington DC and many New Years Eve celebrations throughout the US.

Other positive notes in this application include:

- Reducing the number of treatment locations from four to two.
- Seeking approved status after 31 years of interim status on open detonation treatment of explosive waste.

Conclusion: On-site open detonation for treatment of small amounts of explosive waste is the safest treatment method and creates virtually no environmental impact. NMED should expeditiously approve this application without further conditions.