

January 19, 2015

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Cynthia Giles, Assistant Administrator  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
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**SENT BY ELECTRONIC MAIL**

RE: Proposed Open Burning of M6 Propellants at Camp Minden, Louisiana

Dear Assistant Administrator Giles,

**We, the undersigned organizations, join Louisiana residents, workers and families in their call for a safer alternative to open burning of hazardous wastes at Camp Minden.**

We oppose the plan by the U.S. Environmental Protection Agency to **OPEN BURN 15 million pounds** of abandoned M6 propellants at Camp Minden, Louisiana. By definition, open burning has no emissions controls and will result in the uncontrolled release of toxic emissions and respirable particulates to the environment. M6 contains approximately 10 percent dinitrotoluene (DNT) which is classified as a probable human carcinogen.<sup>1</sup>

Concerns for the potential human health risk created by open burning/open detonation as well as for environmental impacts on the air, soil, and water have required the military to identify and develop alternatives to open burning/open detonation treatment.<sup>2</sup> Moreover, as the EPA's plan provides for the safe handling and transport to an open burning area, these wastes could be similarly moved to an alternative treatment facility or system.

While we support the EPA's initiative to require the U.S. Army to clean up and dispose of these improperly stored explosive wastes, we do not support open burning as a remedy given the inherent and avoidable risks to human health and the environment.

Laura Olah, Citizens for Safe Water Around Badger, Wisconsin  
Dolores Blalock, ArkLaTex Clean Air Network, LLC, Louisiana  
Marylee M. Orr, Executive Director, Louisiana Environmental Action Network/Lower Mississippi Riverkeeper, Louisiana  
Devawn Palmer-Oberlender, Environmental Patriots of the New River Valley, Virginia  
Pamela Miller, Executive Director, Alaska Community Action on Toxics, Alaska  
Craig Williams, Chemical Weapons Working Group, Kentucky  
Erin Brockovich & Bob Bowcock, California

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<sup>1</sup>U.S. Environmental Protection Agency, Technical Fact Sheet, Dinitrotoluene (DNT), January 2014.

<sup>2</sup>US Army Corps of Engineers Construction Engineering Research Laboratories USACERL Technical Report 98/104, Alternatives to Open Burning/Open Detonation of Energetic Materials, A Summary of Current Technologies, August 1998.

United Tribe of Shawnee Indians, Principal Chief, Jim Oyler, Kansas  
Tim Lopez, Director, Voluntary Cleanup Advisory Board, Colorado  
Greg Wingard, Executive Director, Waste Action Project, Washington  
Mable Mallard, Philadelphia Community Right To Know Committee, Pennsylvania  
Doris Bradshaw, Defense Depot Memphis Tennessee - Concerned Citizens Committee  
Isis Bradshaw, Youth Terminating Pollution, Tennessee  
Kaye Kiker, Community Organizer, Citizens Task Force, Alabama  
Wilbur Slockish, Columbia River Education and Economic Development, Oregon  
Al Gedicks, Executive Secretary, Wisconsin Resources Protection Council, Wisconsin  
Doris Bradshaw, Military Toxics Project, Tennessee  
Peter Galvin, Center for Biological Diversity, California  
LeVonne Stone, Fort Ord Environmental Justice Network, California  
Marylia Kelley, Executive Director, Tri-Valley CAREs (Communities Against a Radioactive Environment), California  
Josh Fast, Educator, PermanentGardens.com, Louisiana  
Ronnie Cummins, Organic Consumers Association, Minnesota  
Paul Orr, Lower Mississippi Riverkeeper, Louisiana  
Marcia Halligan, Kickapoo Peace Circle, Wisconsin  
Kathy Sanchez, EJ RJ, Tewa women United org., New Mexico  
J. Gilbert Sanchez, CEO, Tribal Environmental Watch Alliance, New Mexico  
David Keith, Valley Citizens for a Safe Environment, Massachusetts  
Forest Jahnke, Crawford Stewardship Project, Wisconsin  
Maria Powell, President, Midwest Environmental Justice Organization, Wisconsin  
Evelyn Yates, Pine Bluff for Safe Disposal, Arkansas  
Cheryl Slavant, Ouachita Riverkeeper, Louisiana  
Jean E. Mannhaupt, President, Park Ridge @ Country Manors Home Owners Assoc., New York  
Stephen Brittle, President, Don't Waste Arizona  
Alison Jones Chaim, Executive Director, Physicians for Social Responsibility Wisconsin  
Jill Johnston, Southwest Workers Union, Texas  
Robert Alvarado, Committee for Environmental Justice Action, Texas  
Phyllis Hasbrouck, Chair, West Waubesa Preservation Coalition, Wisconsin  
John LaForge, Nukewatch, Wisconsin  
Guy Wolf, Co-Director, DownRiver Alliance, Wisconsin  
Don Timmerman & Roberta Thurstin, Casa Maria Catholic Worker, Wisconsin  
LT General Russel Honore (Ret), GreenARMY, Louisiana  
John LaForge, The Progressive Foundation, Wisconsin  
Paul F. Walker, Ph.D., Director, Environmental Security and Sustainability, Green Cross International, Washington, DC  
Cynthia Sarthou, Executive Director, Gulf Restoration Network, Louisiana  
Lenny Siegel, Executive Director, Center for Public Environmental Oversight, California

John E. Peck, Executive Director, Family Farm Defenders, Wisconsin  
Lois Marie Gibbs, Executive Director, Center for Health, Environment and Justice, Virginia  
Willie Fontenot, Conservation Chair, Delta Chapter of the Sierra Club, Louisiana  
Kimberlee Wright, Executive Director, Midwest Environmental Advocates, Inc., Wisconsin  
Elizabeth O'Nan, Director, Protect All Children's Environment, North Carolina  
Frances Kelley, Louisiana Progress Action, Louisiana  
Patrick Seymour, ISIS institute MilWaste Project, Massachusetts  
Christina Walsh, Executive Director, cleanuprocketdyne.org, California  
Glen Hooks, Chapter Director, Arkansas Sierra Club, Arkansas  
Laura Ward, President, Wanda Washington, Vice President, FOCUS, Inc (Family Oriented Community United Strong, Inc.), Florida  
Ed Dlugosz, President, NJ Friends of Clearwater, New Jersey  
Anne Rolfes, Founding Director, LA Bucket Brigade, Louisiana  
Monica Wilson, GAIA: Global Alliance for Incinerator Alternatives, California  
Dean A. Wilson, Atchafalaya Basinkeeper, Louisiana  
Robin Schneider, Texas Campaign for the Environment, Texas  
Lara Norkus-Crampton, Coordinator, Minneapolis Neighbors for Clean Air, Minnesota  
Haywood Martin, Chair, Sierra Club Delta Chapter, Louisiana  
Mitzi Shpak, Executive Director, Action Now, California  
Jane Williams, Executive Director, California Communities Against Toxics, California  
Robina Suwol, Executive Director, California Safe Schools, California  
Renee Nelson, President, Clean Water and Air Matter (CWAM), California  
Lisa Raggiola, Citizens For A Clean Pompton Lakes, New Jersey  
Stephanie Stuckey Benfield, Executive Director, GreenLaw  
James Little, member, Western Broome Environmental Stakeholder Coalition, New York  
Sparky Rodrigues, Malama Makua, Hawaii  
Barry Kissin, Fort Detrick Restoration Advisory Board, Maryland

**Submitted by:**

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