February 1, 2016

Louisiana Department of Environmental Quality
Public Participation Group
P.O. Box 4313
Baton Rouge, LA 70821-4313.
DEQ.PUBLICNOTICES@LA.GOV

SENT BY ELECTRONIC MAIL

RE: Clean Harbors Colfax, LLC, AI No.32096, Permit No. LAD98105591-OP-RN-MO-1, Activity Number PER 20150001

Dear Louisiana Department of Environmental Quality:

We, the undersigned organizations, are writing to oppose the continued operation of the open burning/open detonation (OB/OD) facility at Clean Harbors Colfax, Louisiana and the proposed permit modification to increase the threshold for OB/OD of reactive and explosives-contaminated wastes from 480,000 pounds to over 2 million pounds per year. These hazardous wastes include fireworks, detonators, propellants, power charges, shaped charges, igniters, fuses, bulk high explosives, rocket motors, detonating cord, air bag inflators, and explosives-contaminated debris.

Open burning and detonation of energetics and explosives-contaminated wastes results in the uncontrolled dispersion of toxic and carcinogenic emissions including heavy metals (cadmium, chromium, lead, etc.), energetic compounds, perchlorate, nitrogen oxides and other munitions-related contaminants to the environment. Dioxins and furans, which are persistent bioaccumulative toxins, are expected contaminants of concern especially when chlorinated wastes are part of the waste stream.

The current and expanded RCRA permit for Clean Harbors Colfax does not comply with federal laws and regulations which ONLY allow for open burning and detonation of hazardous waste which cannot safely be disposed of through other modes of treatment. As the Department is well aware, safer technologies have been implemented and permitted elsewhere including Super Critical Water Oxidation, Static Detonation Chambers, Detonation of Ammunition in a Vacuum-Integrated Chamber (DAVINCH), Controlled Detonation Chambers, and Hydrolysis. Still other technologies such as bioremediation and composting have been successfully implemented as supplementary remedies or for pre-treatment.

In order to protect human health and the environment, we call for the immediate implementation of safer alternatives to open air burning and non-closed loop incineration/combustion of energetics and munitions. These alternatives must incentivize waste prevention and recycling; prevent, to the greatest possible extent, the release of toxic emissions and pollutants; and advance the principles of environmental justice by assuring that all people enjoy the same degree of protection and access to the decision-making process.

Sincerely,

Laura Olah, Citizens for Safe Water Around Badger, Merrimac, WI
Robina Suwol, Executive Director, California Safe Schools, Los Angeles, CA
Forest Jahnke, Crawford Stewardship Project, Rolling Ground, WI
Maria Powell, Midwest Environmental Justice Organization, Madison, WI
Lenny Siegel, Center for Public Environmental Oversight, Mountain View, CA
Carol Miller, President, Peaceful Skies Coalition, Arroyo Hondo, NM
Craig Williams, Chemical Weapons Project Director, Kentucky Environmental Foundation, Berea, KY
Robert Moss, Barron Park Association Foundation, Palo Alto, CA
Ron Hagar, Chair, Camp Minden Citizens Advisory Group (CMCAG), Minden, LA
Dave McCoy, Director, Citizen Action New Mexico, Albuquerque, NM
Frances Kelley, Louisiana Progress Action, Baton Rouge, LA
Mark and Connie Toohey, Volunteers for Environmental Health and Justice, Kingsport, TN
Paul Walker, Green Cross International, Washington, DC
Beth Willis, Frederick Citizens for Bio-lab Safety, MD
Herb Bernstein, Institute for Science and International Security, Washington, DC
Pamela Miller, Executive Director, Alaska Community Action on Toxics, AK
Robin Schneider, Executive Director, Texas Campaign for the Environment, TX
Doris Bradshaw, Military Toxics Project, TN
Alexandra Bryant, Executive Director, Physicians for Social Responsibility Wisconsin, WI
Alexandra Bryant, Wisconsin Environmental Health Network, Madison, WI
Jane Williams, Executive Director, California Communities Against Toxics, Rosamond, CA
Elizabeth O’Nan, Director, Protect All Children's Environment, Marion, NC
Tim Lopez, Director, Voluntary Cleanup Advisory Board, Denver, CO
Al Gedicks, Executive Secretary, Wisconsin Resources Protection Council, WI
Anne Rolfe, Founding Director, Louisiana Bucket Brigade, LA
Lois Marie Gibbs, Ph.D., Leadership Training Program, Center for Health, Environment & Justice, VA
Doris Bradshaw, Defense Depot Memphis Tennessee Concerned Citizens Committee, TN
Bonnie Block/Joy First, WI Coalition to Ground the Drones, Madison, WI
Anne Rolfe, Founding Director, Louisiana Bucket Brigade, LA

For more information, contact:
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