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United States Environmental Protection Agency  
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Ms. Giles:

I, the undersigned, join the thousands of Louisiana residents who oppose the plan by the United States 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. Dinitrotoluene exists primarily in two different isomeric forms. Both forms are harmful, but the more harmful form is known as 2,6-DNT. This substance has demonstrated highly toxic effects in studies conducted on both dogs and mice, including anorexic weight loss; neuromuscular incoordination, and rigid paralysis of the hind legs. 2,6-DNT is also a known carcinogen, which has been shown to cause liver and kidney cancer in mice, and it is estimated that about 20 percent of the DNT in M6 is of the 2,6-isomeric form. It also has moderate water solubility and can even be taken up by plants and wildlife, where some is stored in their tissues. DNT is toxic if it is breathed, orally ingested, or absorbed through the skin.

Another harmful component of M6 is dibutylphthalate (DBP). This substance was formerly used as an ingredient in some nail polishes, but it was banned in 2006, because it was found to be a powerful endocrine disruptor, causing reproductive damage in adults as well as developmental abnormalities in human fetuses, particularly the abnormal development of male genitalia

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. Moreover, as the United States Environmental Protection Agency'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 I support the United States Environmental Protection Agency's initiative to require the United States Army to clean up and dispose of these improperly stored explosive wastes, I do not and cannot support open burning as a remedy given the inherent and avoidable risks to human health and the environment.

Sincerely,

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