

Protect the Community & Workers at the Arroyo Seco Groundwater Pipeline Extension

Mail to: Phil Wong, U.S. Department of Energy Site Office, Lawrence Livermore National Laboratory,
P.O. Box 808, Livermore, California 94551

I am writing to urge the Department of Energy and Livermore Lab to undertake the safety measures necessary to ensure that the cleanup of offsite contaminated groundwater emanating from Livermore Lab does not result in additional public health impacts, as outlined below. I understand that nuclear weapons activities at the Livermore Lab main site have polluted our air, water and soil. In 1987, the EPA placed the Livermore Lab main site on its 'Superfund' List of most contaminated areas in the nation. The Superfund cleanup at the Livermore Lab main site must address radioactive and toxic contamination on-site as well as the off-site toxic groundwater plume emanating from the Lab that has migrated under our homes, city streets and public areas such as Big Trees Park and a community swimming pool.

In general, I support the effort to build a pipeline to the outer edge of the off-site contamination, pump the toxic water into the pipeline and bring it back to the Lab site in order to clean it in an existing groundwater treatment facility. Cleaning the water in a treatment facility on the Lab's property is far superior to the original plan, which was to dump the toxic water into the sewer and let it go to the San Francisco Bay untreated. However, I also note that the pipeline extension will go through soils known to be contaminated with plutonium, a long lived radioactive element that is dangerous in microscopic quantities. Soil testing done in the 1990s found elevated levels of plutonium in the top few inches of soil along the route and in Big Trees Park, where the new pipeline will connect with the off-site toxic groundwater pumping station. I am extremely concerned that the construction of the pipeline is likely to result in additional public health impacts from the disturbance of plutonium-contaminated soils unless additional precautions are taken during construction. **Specifically, I urge the Dept. of Energy and Livermore Lab to:**

- 1) **Stratify Soil Testing:** Any soil testing should use methods that do not mix topsoil with deeper soils thereby disguising the concentration of plutonium existing in topsoil (where it has been found before).
- 2) **Follow Up When Radiation above "Background" is Detected:** Any soil samples or air monitoring that exhibit elevated radiation readings should be further analyzed with more sophisticated equipment. Pipeline construction should be halted while the situation is remedied. Any radioactive hot spots should be removed.
- 3) **Include Radiation Air Monitors:** A Dust Control and Air Monitoring Plan should be developed that includes mobile radiation detectors. More specifically, continuous air monitors should be employed during pipeline construction (as they are already used on-site at Livermore Lab where radiation may be present).
- 4) **Strengthen Monitoring of Contaminated Groundwater Plume:** The existing groundwater monitoring system should be augmented to enable better detection of plume migration/expansion. This will provide a warning if the "leading edge" of the contamination migrates further and increase confidence that all of the toxic groundwater has been captured.
- 5) **Be More Transparent:** The cleanup plan should provide a more detailed discussion of the sampling methodology, detection limits, background levels assumed, sample reporting, go no-go decision points and limits, and worker and community protection measures.
- 6) **Provide Another Opportunity for Public Comment:** These above-noted items should be made part of the cleanup plan, and the public should be given another chance to comment before it is finalized. Since construction is not planned until 2012, the Lab can act promptly to seek additional public input without delaying the schedule.
- 7) **Make Information More Accessible:** Dedicate a website or a create a more publicly accessible page on the Lab's existing website so that the public can clearly follow the process and access key documents.

Sincerely,

Name:

Address:

Additional Remarks: