

SEND THIS PUBLIC COMMENT TO:

Mr. Alejandro Galdamez, project manager
CA Dept. of Toxic Substances Control (DTSC)
700 Heinz Ave., Berkeley, CA 94710
Email: alejandro.galdamez@dtsc.ca.gov

Dear Mr. Galdamez:

I am submitting this letter as a public comment on DTSC's proposal to grant the Lawrence Livermore National Laboratory (LLNL) a permit renewal to store and treat hazardous wastes that are toxic, reactive, corrosive, ignitable and/or mixed with radioactive elements without conducting an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act. I ask that DTSC consider the following:

- 1.** The permit would allow LLNL to treat and store 913,270 gallons of liquid and solid hazardous wastes. Further, it would allow LLNL to treat 600 tons of solid hazardous wastes per year, including uniquely dangerous wastes.
- 2.** If issued, the permit will remain in place for ten years according to regulations. However, the duration could be even longer given that DTSC issued LLNL its first and only similar operating permit for "hazardous waste treatment and storage" in November 1999, nearly 16 years ago. Waste operations at LLNL have changed considerably since then. Further, DTSC is using a mere "addendum to the adopted negative declaration" of 1999 as its basis for issuing a permit now. This decision will have a long-lasting, and potentially negative, impact on our public health and the environment.
- 3.** The 2015 permit decision document (the "addendum to the adopted negative declaration") identifies future activities that will take place at LLNL in 2010 and 2011, revealing that parts of the decision basis for this permit were written years ago and not updated. Moreover, the "future" activities include increases in "non-routine" mixed radioactive wastes, low-level radioactive wastes and transuranic (plutonium) wastes that DTSC noted are outside the bounds of LLNL's prior site-wide study. The "addendum" summarily asserts that these increases, which it calls "fluctuations," pose no additional risk. However, the "addendum" lacks an in-depth analysis to bear out that conclusion. And, it is silent on post-2015 "fluctuations."
- 4.** The permit fails to consider foreseeable waste streams that may differ from present operations. For example: LLNL is home to four of the ten most dangerous toxic and radioactively-contaminated facilities in the US nuclear weapons complex awaiting decontamination & decommissioning (D&D). Needed hazard mitigation and D&D activities will involve new waste streams and potential new exposure scenarios. Yet DTSC makes no mention of them.
- 5.** The permit is based on outdated analyses of potential earthquake damage leading to hazardous waste releases. LLNL is updating its seismic hazard analysis based on new information from the USGS. While LLNL has not yet released its results, it is known that the USGS determined there are increased risks from more significant ground motion and liquefaction than previously considered at and around LLNL.
- 6.** The permit lacks other needed analyses, including of cumulative impacts, housing incompatible wastes in close proximity (2.5 feet apart for solids while stacked 2 barrels high) and more. Further, the permit does not state the frequency of DTSC inspections, consider alternative processes that could reduce the generation of hazardous wastes, or include specific measures to mitigate potential hazards.

In sum, DTSC must not issue the permit in its present form. At a minimum, DTSC must first conduct an EIR, fully analyzing LLNL's hazardous waste streams, operations and facilities, as well as alternatives and mitigation measures.

Sincerely,

NAME:

ADDRESS/CITY/STATE/ZIP:

Additional comment: