Presentation to the Tracy City Council on 12-5-17
Regarding the Proposed Action to Increase Open-Air Detonations at the Lawrence Livermore National Lab Site 300

PowerPoint prepared by Tri-Valley CAREs on 12-1-17 • More information: www.trivalleycares.org
Who We Are

Statement of Support for the Draft Letter Under Consideration

• Tri-Valley CAREs has monitored activities at the Lawrence Livermore National Laboratory Main Site in Livermore and Site 300 near Tracy since 1983.

• The group has 5,600 members, most living or working near Livermore and Tracy.

• Tri-Valley CAREs holds a Technical Assistance Grant from the U.S. Environmental Protection Agency to inform residents about the Superfund cleanup of toxic and radioactive contaminants at Site 300, and has done so since Site 300 was placed on the Superfund list in 1990.

• Tri-Valley CAREs Executive Director and Staff Attorney have read the “Draft Environmental Assessment for the Proposed Increase in Weight of Explosives Detonated at Lawrence Livermore National Laboratory Experimental Test Site, Site 300” (DOE/EA-2076) released in November 2017, and staff and members are continuing to review the Proposed Action and the Authority to Construct/Permit to Operate Application for the bigger explosions included as Appendix A in DOE/EA-2076.

• On November 15, 2017 Tri-Valley CAREs sent a letter to the Dept. of Energy (DOE) Livermore Field Office (LFO) requesting a 60-day extension to the public comment period (from November 7, 2017 to February 5, 2018) and public hearing conducted by DOE to be held in Tracy.

• On November 30, 2017 Tri-Valley CAREs was informed by email that the DOE LFO would grant an extension of the public comment period only until December 22, 2017. There was no mention of any DOE public hearing or public meeting in Tracy. None has been held to date. We have reiterated our request for both these key items to DOE.

• Tri-Valley CAREs strongly supports the draft letter being considered by the Council this evening (Attachment A in the City Council December 5, 2017 meeting package).

• In the following slides – and in supplemental materials we are handing out – are (a) points in support of the City’s concerns and opposition outlined in the draft letter and (b) additional points for your consideration.
This is an open-air test explosion at Site 300. Tri-Valley CAREs obtained the photo from LLNL.
The Proposed Action to increase the detonation of high explosives from 100-pounds/day to 1,000-pounds/day (10x) with an annual increase from 1,000-pounds/year to 7,500-pounds/year (7.5x) poses impacts Tri-Valley CAREs has noted in its analysis so far with regard to:

• Noise,
• Air toxics and overall air quality,
• Human health and safety,
• Endangered species,
• Soils and geology,
• Waste management, and
• Cleanup of soils contaminated with uranium-238 from past detonations at the Building 851 firing table
Noise Impacts

• We support the points made in the draft letter under consideration.
• We would note further that the EA states that peak sound pressure levels at 130 dB are “generally objectionable and are often described as very loud and startling.” The EA then states that the noise will not exceed 126 dB in populated areas. However, it does say that the Proposed Action would cause noise levels to exceed 130 dB off-site.
• Weather/atmospheric conditions affect noise levels. At first review, it looks to us like the modeling underlying the EA conclusions that the “impulse noise” would be “higher” but not “significant” may have used optimistic assumptions about weather conditions (and other conditions) to reach that conclusion.
• We are concerned, as is the City letter, about the EA statements that “the sound pressure level of 126 dB would not be exceeded in populated areas, or at the receptors of concern, for 85% of all detonations.” A plain language reading suggests that that noise level is calculated to be exceeded 15% of the time. Yet, detailed analysis or discussion of these events is lacking in the EA.
• Additionally, it is not clear how the DOE Livermore Field Office concluded that 126 dB is acceptable to people. The EA states that a lesser level, 120 dB, would “rattle loose windows, or pictures on the walls... but it would not cause structural damage.”
Additional Issues for Consideration

- **Air Quality:** The EA lists 121 toxic and hazardous materials that will be in the open-air blasts. Further, there are legitimate questions about excessive re-suspension of radioactive particulates present in soils around the B-851 firing table, specifically uranium-238.

- **Waste Management and Transport:** The EA posits that vastly larger amounts/weights of high explosives in the blasts will not have an impact on wastes. Then, in another section (4...1.6) it states that the increase would be “minimal.” Moreover, it posits that the bigger blasts would not require additional explosive shipment. It is not clear how this would be true, nor is there any detailed analysis to substantiate the claims in the EA.

- **Health and Safety for Workers:** The EA states that the Proposed Action will not result in any impact on worker health. Yet, the claim is not supported by detailed analysis.

- **Superfund Cleanup Timelines.** A September 2017 Site 300 report says about the B-851 firing table area that any “required remediation [cleanup] to protect human health and the environment in the long term would not occur until the firing table is no longer active...”

- **Purpose and Need.** This section of the EA is also inadequate. For example, the BEEF facility in Nevada is summarily ruled out although it was constructed specifically for Livermore Lab open-air detonations, and related experiments, and has been managed by Livermore Lab personnel.

- **Fragmented Approach to the National Environmental Policy Act.** The EA makes clear that the last Site-wide Environmental Impact Statement was finalized in 2005, and was based on 2002 (and older) data. Moreover, requirements for analysis in an EIS have changed. It is past time for a new Site-Wide EIS, not merely another piecemeal project-specific EA.

- **Need for a Full 60-Day Extension of the Public Comment Period and a Public Hearing in Tracy.**
Figure 1: Land Use around Site 300
Public Comment and Petition

To Close the Open-Air Toxic & Explosive Firing Tables at Livermore Lab’s Site 300

I call on Livermore Lab, the Dept. of Energy, and state and federal environmental agencies to take immediate action to stop open-air explosions with toxic materials at Site 300, on Corral Hollow Rd. near Tracy, CA.

I note that...

The City of Tracy is expanding and “Tracy Hills,” a newly authorized development of 6,500 homes, will extend essentially to the Site 300 boundary (see map on back).

Livermore Lab operates two open-air firing tables at Site 300. Toxic materials and high explosives are detonated with no air pollution control equipment. The tests are conducted outdoors on gravel pads.

Livermore Lab plans to increase the amount of high explosives used in open-air tests at site 300 from the current limit of 100 pounds per day to 1,000 pounds per day, a 10 fold increase daily!

Livermore Lab plans to increase the annual amount of high explosives detonated in the open air from the current limit of 1,000 pounds per year to 7,500 pounds, a more than 7-fold increase yearly! (DOE/LA-2017, Page 2, published November 2017).

Livermore Lab records show that 60 different toxic poisons may be present in open-air blasts at Site 300.

At the open-air firing table where Livermore Lab plans to set off these bigger blasts, 80 pounds of uranium-238 has been found scattered around from past detonations.

The proposed larger blasts will involve numerous toxic materials. These tests threaten human health and will add more pollution to the environment.

Site 300 is already a federal “Superfund” cleanup site with past pollution due to the open-air firing tables. Cleanup will not occur until the open-air firing tables are closed. A September 2017 Site 300 report states that any “required remediation [cleanup] to protect human health and the environment in the long term would no longer be active…” (Page 159).

It is of the utmost urgency that these open-air firing tables be closed and that cleanup of contaminants becomes the priority at Site 300.

Further, I call on DOE to extend the public comment period on its proposal to increase the size of the open-air blasts at Site 300 by at least 60-days, and I call on the DOE to hold public hearings on the plan.

Signed
NAME:
ADDRESS:
CITY/ZIP:

My additional comment(s):

Take Action!