Tri-Valley CAREs June, 2007

Citizen's Watch...

UC Students' Hunger Strike

More than 40 University of CA (UC) students, alumni and faculty responded to their University's continuing involvement in the nuclear weapons complex by undertaking a hunger strike on multiple campuses across the state. The student-led hunger strike culminated at the May 17 UC Regents' meeting in San Francisco. The fasters called on the Regents to get UC out of the nuclear weapons business by refusing to manage the Livermore and Los Alamos Labs.

Tri-Valley CAREs' Outreach Director, Jedidjah de Vries, attended the meeting. A number of hunger strikers, for whom this was their 9th day without food, spoke powerfully against Livermore Lab's role designing the first new H-bomb since the end of the Cold War, the so-called Reliable Replacement Warhead (RRW-1). The fasters also protested the expansion of plutonium bomb core production at Los Alamos.

Jedidjah called the students' testimony during the public comment session "amazing" and "exhibiting a depth of understanding" about nuclear weapons. They assailed the Regents for knowingly involving the University in immoral nuclear weapons development. They conveyed broad campus and public support for severance. And, they spoke of their passion and commitment.

One hunger striker reminded the Regents that "We are not starving for fun." Another described his aching body and then explained that the ache in his heart every time he thought about the University's role in the creation of nuclear weapons was far greater.

After the comment period, the fasters and their supporters gathered in a large circle outside on the grass. One by one, each had a chance to speak. Students expressed joy at being part of a group that was acting to steer UC toward a new conscientious path. They reminded each other that they—the students—were the real University, and that they held the power to bring about a better future.

The students, 100 strong including supporters, returned to the meeting mid-day when the Regents convened the "Committee on Oversight of the DOE Labs." It quickly became clear that the Regents planned to sidestep the hunger strikers' demand they get out of the nuclear weapons enterprise. Some of the fasters stood and demanded a response.

Regent Norman Pattiz told them that we "need to go forward with the business of the University." Tellingly, the agenda

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Livermore Lab "Green" Bidders Decry Contract

Cite Missed Opportunity to Move Lab From H-bombs to Civilian Science

The May 2007 decision to award management of Livermore Lab to the University of California (UC) and Bechtel Corp., the same institutions recently selected to manage the Los Alamos weapons lab, is good news for nuclear proliferation -- but bad news for civilian science, workers and the environment. Further, the new contract demonstrates the total failure of the Dept. of Energy (DOE) to conduct a fair and open, competitive bidding process.

A team of "watchdog" groups, academics and green energy proponents seeking to transform Livermore Lab into a premier environmental research facility had their bid summarily dismissed earlier in the process for being out of step with DOE's "strategic vision" of new weapons research.

"This contract is DOE conducting business as usual," said Marylia Kelley, executive director of Tri-Valley CAREs and the manager for the Livermore Lab GREEN, LLC team. "The network of nuclear weapons 'good-old-boys' who have done so much damage to the nation's budget, security and environment are now in charge of both research labs."

"The DOE has missed a key opportunity to take Livermore Lab in a new direction," Kelley added. "I am disappointed, but not surprised."

The "green" team's proposal would have promoted world class science by transforming Livermore Lab from a nuclear weapons design facility into a center for civilian science.

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Hearing... Cont. from page 4

tritium contamination in water above 20,000 picocuries per liter instead of the 144 picocuries per liter that is the U.S. EPA goal. Tell EPA that the strictest levels should be used in determining "how clean is clean" for Site 300.

8. Site 300 must be cleaned up to residential standards, which will allow unrestricted future use. The Proposed Plan limits the cleanup to "industrial standards," which means that pollution that could be cleaned up will be left there.

9. The Proposed Plan pays inadequate attention to the fate of endangered species at Site 300, including the San Joaquin Kit Fox, the red-legged frog and others.

10. The Proposed Plan does not prioritize cleanup over future bomb blasts and other activities that could further contaminate Site 300. Nor does the Proposed Plan guarantee that adequate cleanup funding will be available in future years to make sure the job gets done — and gets done right.

We all have a right to clean air, soil and water. It's time for all of us to speak up.

Under the Superfund law, "Community Acceptance" is one of the 9 criteria that will be used by EPA in determining whether or not to "sign off" on the Proposed Plan as it is currently written. Please help us tell EPA (and the Lab) that the Proposed Plan must ***first be improved*** before it can be accepted.

Please attend the hearing if you can. And, whether or not you are able to join us in-person, be sure to sign the comment letter inside this edition of your *Citizen's Watch*. ***We will deliver the letter for you to DOE, Livermore Lab and the EPA.***

The comment period for written remarks is slated to end on June 25. However, Tri-Valley CAREs is requesting a 30-day extension (to July 25). The Superfund regulations require that an extension be granted if one is requested. ***There is ample time for you to sign and mail us the comment letter.***

Livermore Lab "Green"... Continued from page 1

According to Kelley, by focusing on socially beneficial scientific initiatives like sustainable energy, global warming and environmental cleanup technologies, DOE could have increased cutting-edge research at Livermore Lab while providing more security and safety for its employees. Instead, she said, "the DOE has demonstrated its lack of vision."

Jay Coghlan, executive director of Nuclear Watch of New Mexico and a member of the "green" team, added, "Bechtel, whose bottom line is profit, is now in the business of designing at Livermore and producing at Los Alamos the first new U.S. nuclear weapons in 20 years. Apparently Bechtel and its partners expect business to boom, at the expense of the American taxpayer and global security."

The "green" team members are concerned, too, that Livermore Lab's management is being given to essentially the same UC-Bechtel consortium that took an historically bad management situation at Los Alamos Lab in New Mexico and made it much worse.

"If the Los Alamos Lab contract is indeed the harbinger for Livermore, I fear for the future of the employees and our community," Kelley told reporters. In contrast, the "green" team's management plan contained specific health and safety and whistleblower protections for employees.

The Livermore Lab GREEN, LLC management proposal would have transitioned Livermore Lab from nuclear weapons development to an unclassified "World Class Center for Civilian Science" within 5 years. Plutonium and highly enriched uranium would have been removed in 4 years.

The Livermore Lab GREEN (Green Renewable Energy and Environmental Nexus), LLC consisted of two community-based organizations, Tri-Valley CAREs and Nuclear Watch of New Mexico, partnered with an academic institution, New College of California, and a green energy company, WindMiller Energy.

Reflections on the "Green" Bid

When we formed the Livermore Lab GREEN, LLC to bid for the Lab's management contract, we did not expect that DOE would welcome our plan. Thus, we did not define "winning" as having the DOE choose our proposal.

Our "green" bid was successful on many levels. It made headline news across the country. It demonstrated beyond a doubt that Livermore Lab could be transitioned to civilian science. It offered us a creative and novel way to focus attention on positive alternatives for Livermore. It allowed us to say "no" to nuclear bombs and plutonium at the Lab -- while saying "yes" to socially-beneficial research.

Our bid opened up minds to new possibilities; here within the Livermore Lab itself and in Washington, DC. We were pleasantly surprised by the large amount of support we received from Lab employees, as evidenced by many phone calls and conversations. Too, when we traveled to DC, a number of legislators congratulated us on our "green" bid.

Our bid was "Quixotic" and symbolic, yet completely feasible. It gave us a voice in the management process. It also has given us objective criteria by which to judge the UC-Bechtel consortium that DOE chose. The new managers may have been picked -- but the work, and the vision of a "green" lab in Livermore, continues. ***We thank you for your great support. Stay tuned.***

❖ Alerts 4 U ❖

Wednesday, June 20

Public Hearing on
Site 300 Superfund Cleanup
6 PM, Tracy Community Center
300 East 10th St., Tracy
(925) 443-7148 for details

This is a crucial time for **YOUR VOICE** to be heard. See page 4 and the enclosed letter for details. Join us—and bring your friends and neighbors too.

Thursday, June 21

Tri-Valley CAREs meets
7:30 PM, Livermore main library
1188 So. Livermore Ave.
(925) 443-7148 for details

New and long-time members alike are welcome. We will have updates and letter writing supplies on the new H-bomb being designed at Livermore Lab. We will also discuss the new management contract, the Site 300 Superfund cleanup, the planned bio-warfare agent research at the Lab's main site and Site 300—and more. Come prepared to make a positive difference in the world. Each seemingly "small" action we take truly adds up.

Thursday, July 5

Tri-Valley CAREs' Mailing Party
2 shifts: 4 PM-6 PM and 7 PM-9 PM
Tri-Valley CAREs offices
2582 Old First St., Livermore
(925) 443-7148 for details

Peace is Patriotic—help get Tri-Valley CAREs' July newsletter ready for the Post Office. We will have snacks, good conversation and mailing labels. Just bring yourself and a smile. ***(Yes, chocolate is involved.)***

Thursday, July 26

Sick Worker Support Group meets
10 AM, Livermore main library
1188 So. Livermore Ave.
(925) 443-7148 for details

The support group is for Livermore Lab, Sandia and other DOE workers made ill by on the job exposures to toxic and radioactive materials—and for their families. At the meeting, we will focus on the recently released Sandia Site Profile, which the government will use to determine the likelihood that workers were exposed. "Special Exposure Cohort" status—a speedier way to obtain determinations—will also be discussed. ***Worker participation is vital.***

Saturday, July 28

Tri-Valley CAREs' annual
strategic planning retreat
9:45 AM-4 PM, United Christian Church
1886 College Ave. (at "M" St.)
Livermore, RSVP REQUIRED,
(925) 443-7148

We will revisit our accomplishments of the past year, discuss the present and plan our priorities for the coming year. This planning process is part of how we keep the organization focused and effective. If you are a Tri-Valley CAREs volunteer, community member, supporter, staff or board member—this retreat is for you. The planning retreat is limited to 20 people. Please RSVP early if you want to participate. A packet of materials will be mailed to confirmed participants one week in advance.

The House Energy and Water Appropriations Subcommittee has zeroed out (i.e., cut) all of the fiscal year 2008 funding for the Reliable Replacement Warhead, the new H-bomb being designed at Livermore Lab. They also zeroed out all funding for the new plutonium bomb plant, proposed as part of "Complex 2030". Next, we can expect that others will try to put money back into the budget. Also, the Senate Energy and Water Appropriations Subcommittee budget numbers are not determined yet.

ACTION: *Call your Senators, especially Dianne Feinstein who sits on the Senate Energy and Water Appropriations Subcommittee, and tell them your thoughts on the budget for new nuclear weapons. The Capitol Switchboard is (202) 224-3121.*

Students... *Cont. from page 1*

item that occupied the Regents at that moment included viewgraphs on how Livermore and Los Alamos Labs "are integrally involved" with a "vision for the Nuclear Weapons Complex of 2030". Pattiz told the hunger strikers "I hope you will go and have some lunch."

The hunger strikers told the Regents that as long as UC chose to continue creating new nuclear weapons, they, as students, would continue demanding accountability and moral responsibility from their University. The Regents walked out and called in the police to clear the meeting room. After the arrest warning, all but thirteen of the hunger strikers and their supporters left the room. The thirteen who stayed peaceably locked arms and were arrested.

At the end of the day, one hunger striker summed up the determination felt by many: "I was really ready to go into the Regents' meeting, and I'll be ready for the next one in July."

In the meantime the hunger strikers, who have ended their fast, are continuing their resistance to nuclear weapons — and are following up on Regents' promises to meet with them.

If you are a UC student and wish to learn more about the statewide Coalition to Demilitarize the University of California, send email to jedidjah@trivalleycares.org.

Hiroshima Remembrance Planned at Livermore Lab

Tri-Valley CAREs and colleagues are planning a solemn vigil on the **morning of August 6** to commemorate the first use of an atomic bomb in war. We will gather at the place where the next U.S. nuclear weapon is being developed and commit ourselves to the abolition of nuclear weapons. Call us if you would like to be on the planning committee. And, see our website and your July ***Citizen's Watch*** for details.

Crucial Hearing on Toxic and Radioactive Pollution

WHEN: Wed., June 20, 2007
6:00 PM to about 8 PM

WHERE: Community Center
300 East 10th Street,
Tracy, CA

WHAT: This is the public's last chance to comment on the site-wide Proposed Plan to clean up the massive toxic and radioactive pollution at the Livermore Lab's Site 300 in Tracy.

The Lab uses Site 300 for the development and testing of high explosives and nuclear weapons components. Site 300 is a federal Superfund cleanup location; the contamination there is among the worst in the country.

Please attend the meeting in person and / or sign and mail the letter inside this newsletter.

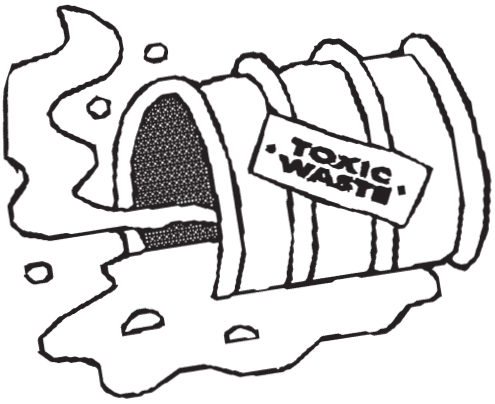
The Environmental Protection Agency will look at public comments submitted at this time to determine whether the proposed cleanup plan is acceptable to the community as is — or whether it needs to be improved.

It is critically important that your voice be heard *now*. Your input can improve the health and environment of Tracy and surrounding communities by requesting that the Proposed Plan be strengthened to provide a comprehensive cleanup of all pollution at Site 300.

"TOP 10" THINGS TO SAY:

1. Some of the main contaminants found in soil and water at Site 300 include Volatile Organic Compounds like TCE, which is the chemical of concern in the book and movie, "A Civil Action."

2. The soil and groundwater are also massively polluted with high explosives, radioactive tritium and Uranium-238, also called depleted uranium. The use of depleted uranium in weapons is hotly debated because of its associations with cancer and numerous other illnesses.



3. There is a two-mile long radioactive tritium plume on site and a concentration of 2 million picocuries of tritium per liter of water has been documented. Tritium is the radioactive hydrogen of the hydrogen bomb, and it is associated with a wide range of health effects including cancer, immune system deficiencies, miscarriage and birth defects.

4. Human health risk estimates at Site 300 indicate elevated risk if contaminants are left in place. Tell the Lab and EPA that health risks to Site 300 workers and community members from contamination are not acceptable. The cleanup should be comprehensive and complete.

5. The Proposed Plan does not go far enough in cleaning up Site 300. For example, the plan does not commit to stopping the migration of radioactive and toxic contaminants that are moving underground in the groundwater.

6. The Proposed Plan does not include active excavation of "hot spots" where contaminants have been put in unlined dumps at Site 300. These radioactive and toxic wastes are leaching from the dumps into the groundwater — including Uranium-238, which has a radioactive half-life of more than 4 billion years. The City of Tracy specifically requested that the Livermore Lab excavate the radioactive debris in the unlined dumps, but doing that is not included in the cleanup plan.

7. The Proposed Plan does not propose to clean up soil and groundwater to the most stringent requirements (i.e., to the cleanest levels possible). Instead, it proposes to clean up to the most lax standards possible. For example, the Proposed Plan only considers radioactive

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Tri-Valley CAREs
Communities **A**gainst a **R**adioactive **E**nvironment
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Please sign and mail this 4-page public comment letter, before July 25, 2007, to:
Tri-Valley CAREs, 2582 Old First Street, Livermore, CA 94551

Community Acceptance Criteria for the Site 300 Superfund Cleanup

I, the undersigned, am mailing this public comment letter to Tri-Valley CAREs with the understanding that it will be submitted on my behalf during the public comment period on the Proposed Plan for the Superfund cleanup of the Livermore Lab's Site 300 high explosives testing range in Tracy, CA.

I understand that the U.S. Environmental Protection Agency (EPA) will take my comment letter into consideration in determining whether or not there is "community acceptance" for going forward with the Proposed Plan as it is presently written. Community acceptance is one of 9 criteria the EPA must judge before "signing off" on a cleanup plan.

I cannot accept the Proposed Plan until it is improved and strengthened so that it will result in a more complete and comprehensive cleanup of pollution at the site.

The Proposed Plan, as it is currently written, does not go far enough in cleaning up the massive amounts of radioactive and toxic contamination that are present in soil, surface water and groundwater at Site 300.

Livermore Lab's Site 300 is one of the most contaminated locations in the country, with radioactive tritium, Uranium-238, volatile organics like TCE, high explosives like RDX, perchlorate, PCBs and other potentially deadly pollutants that must be adequately addressed in the cleanup plan.

Many of these contaminants are already in the groundwater and are migrating -- and are thus polluting pristine water as they travel. In one area of Site 300, there is a 2-mile long underground contaminant plume with radioactive tritium emanating from below a gravel "firing table" where bomb blasts are conducted and the unlined waste pits where the debris from the bomb tests has been dumped. Tritium is the radioactive isotope of hydrogen made in reactors for hydrogen bombs. The Proposed Plan does not commit to preventing its further migration through the environment.

The unlined waste pits also contain Uranium-238 and other contaminants. The City of Tracy recently sent a letter to the Dept. of Energy (DOE), which owns the Livermore Lab Site 300, requesting that these dump sites be excavated so that deadly materials will not continue to leach into the groundwater. Tri-Valley CAREs has long advocated that the DOE undertake "hot spot" removal of contaminants in the unlined dumps. The Proposed Plan does not propose any removal of contaminants from the unlined dumps, even though the dump sites are demonstrably leaking.

I am also disturbed that the Proposed Plan often chooses the most lax cleanup standards for pollutants on the site (e.g., the maximum contaminant levels) rather than the most stringent ones (e.g. the EPA's remediation goals). The question of "how clean is clean" is a crucial one in any Superfund cleanup -- and this is especially true at Site 300 where there are multiple pollutants mingled together in various media and complex geological features like earthquake faults and regional aquifers.

The next three pages contain **"community acceptance criteria"** developed by Tri-Valley CAREs in consultation with community members in Tracy, the Central Valley and the Tri-Valley. I ask that the DOE, EPA and state regulatory agencies consider these criteria in making cleanup decisions at Site 300. And, particularly, I request that the EPA use these criteria to determine community acceptance of the Proposed Plan. In short, if the Proposed Plan does not contain these elements, then it is not an acceptable cleanup plan.

1. Complete the Site 300 cleanup project in a timely manner.

Set a schedule for cleanup activities and adhere to it. The goal should be to complete cleanup ten years after the Dept. of Energy's (DOE) last scheduled Record of Decision (ROD), with up to 30 additional years for monitoring of residual contamination. As part of the plan, schedule milestones addressing total mass removal, and trends toward achievement of clean-up goals should be established and committed to by the DOE. Areas that will still be contaminated should be identified. We recognize that cleanup in 10 years after the last ROD will be difficult to achieve in some small areas. Also, because of the nature of tritium, EPA and California drinking water standards will not be attained for that contaminant in the near future.

2. Cleanup levels should support multiple uses of the property.

Assumptions about land-use need to be altered. As we can see, residential development is beginning to take place up near the site boundary. Any modeling assumptions should assume large residential communities relying on the regional aquifer for drinking water, thus speeding up groundwater movement. Second, we do not believe that Site 300 will necessarily always remain a DOE site. The "need" for testing nuclear weapons and components (particularly of new and modified designs) is a political decision, not a technically necessary mandate, and, in our opinion this testing should cease. We recommend that Site 300 future land use assumptions include mixed residential, recreational, ecological preserve and industrial land uses. Yet as it now stands, DOE assumes that Site 300 will remain in DOE's control in perpetuity. We recommend that Site 300 assume to be mixed residential, recreational, ecological preserve and industrial land uses. Without full cleanup to standards appropriate for residential use, the residual contamination will remain in place and will restrict the future use of the property. The Proposed Plan must commit to cleaning up to residential standards -- this will ensure that a whole new cleanup will not need to be undertaken at a later date to go after the significant residual contamination that industrial standards would leave behind.

3. The strictest state and federal government cleanup levels should be used.

We believe that the strictest cleanup levels should be met in cleaning up the site. Federal and state Maximum Contaminant Levels (MCLs) for all groundwater (on-site and off-site) should be the "bottom line below which the cleanup will not fall." In many cases the technology exists (and/or can be developed) that will clean up contamination to "background" levels — that is to the level that existed in nature at the site before Livermore Lab took over in 1955 and began polluting it. In such cases where "background" cleanup levels that are more protective of human health and the environment can be achieved, they should be achieved. Moreover, the U.S. EPA has published "preliminary remediation goals" for many contaminants that are more stringent than the Maximum Contaminant Levels. The State of California also has cleanup goals that are more strict than the MCLs. In this regard, Tri-Valley CAREs concurs with a strict interpretation of the California Regional Water Quality Control Board's non-degradation policy for groundwater. Migration of contaminants into pristine waters should be halted. At a minimum, the standard of 1 in 1 million excess cancer deaths should be adhered to, as well as meeting a hazard index of less than 1 (non-cancer health effects). The Proposed Plan must commit to the strictest cleanup standard promulgated by appropriate state and / or federal regulatory agencies like EPA and the Regional Water Quality Control Board, not the most lax.

4. Remedies that actively destroy contaminants are preferable.

In order of preference, Tri-Valley CAREs recommends the following types of cleanup measures: a) remedies that destroy contaminants (i.e. by breaking them down into non hazardous constituents), such as ultraviolet light/hydrogen peroxide, permeable barriers, or biodegradation; b) active remedies that safely treat or remove contaminants from the contaminated media; c) monitored natural attenuation in so far as it relies on natural degradation (and not further dispersion of the pollution) within a reasonable time frame. What is called "risk and hazard management" (i.e., restrictions on land use, fencing, signs and institutional controls) is not a valid cleanup in our eyes. In no case do we think that "point of use cleanup" (e.g., merely placing filters on off-

site drinking water wells) is appropriate. In all cases, hydraulic control should be established to halt migration of contaminant plumes to pristine waters. When soil excavation takes place, it should be properly controlled to minimize releases of contaminated soil into the air, and onto adjacent properties.

5. The tritium source and plume at Site 300 should be controlled.

Continued forward momentum of the tritium plume must be halted. The tritium plume, about two miles long and growing, cannot be cleaned up in the usual sense of the word, since it is not feasible to separate the radioactive hydrogen (tritium) component from the water. Therefore, Tri-Valley CAREs recommends the following: a) isolation of the tritium contaminated wastes in the unlined dumps to prevent further and continuing contamination of the groundwater; b) hydraulic control of the plume to prevent further migration; c) aggressive monitoring to ensure minimal migration while the tritium decays; and, d) a stringent contingency plan in case these methods fail. As it currently stands, groundwater rises into the waste dumps during heavy rainfall and picks up additional tritium. Isolation of the wastes may be accomplished by use of drains, capturing groundwater upstream from the pits before it is inundated, and, where feasible, by removing the tritium-contaminated debris from the pits and storing it above ground in a monitored facility. The Proposed Plan must commit to these actions as needed to prevent further movement of tritium.

6. Radioactive substances should be isolated from the environment.

Contaminants should be removed, where possible, and stored to prevent future leakage. As is the case with tritium, there are several plumes containing Uranium 238, also called depleted uranium. Technology exists to separate this contaminant from the groundwater. Tri-Valley CAREs recommends that this contaminant be stored in above ground monitored facilities after separation from groundwater. This will prevent it from polluting a new location in the future.

7. The ecosystem should be protected in the cleanup remedy.

Site 300 is home to endangered species and critical habitat. Site 300 sits on 11 square miles of land about 30 miles east of San Francisco. It sits on a series of steep hills and canyons, covered by grasslands. Seven major plant communities occur at Site 300, including: coastal sage scrub, native grassland, introduced grassland, oak woodland and three types of wetland. 20 species of reptiles and amphibians, 70 species of bird, and 25 species of mammals also occur. Special, rare and endangered species may live there, including the burrowing owl, the San Joaquin Kit Fix and the Large-Flowered Fiddleneck. In order to protect the ecosystem, ecological risks should be no greater than those for humans (i.e., a Hazard Index of less than one for selected species, based on recent data). This involves making sure that cleanup activities do not inadvertently destroy unique habitat. This could occur from too quickly pumping groundwater, with the effect of destroying natural springs, or by capping large areas and replacing the vegetation with non-native species. The Proposed Plan must be rewritten to be more protective of endangered species at Site 300.

8. Decisions should not rely on modeling alone.

The Site Wide Feasibility Study for the Site 300 cleanup and other documents point out just how complex the hydrogeology of the site is, and how little is known about it. Given this, Tri-Valley CAREs believes that over-reliance on modeling to predict the fate and transport of contaminants is not a good idea. Computer modeling should be used as a tool only, and continually updated by field testing as that information becomes available. We believe that if it necessary to base decisions primarily on modeling, the most conservative assumptions should be used. The Proposed Plan must include adequate, long-term field testing.

9. Additional site characterization is needed.

Adequate site characterization can ensure that the cleanup technologies built will be the ones needed for the pollutants in that specific area. It is apparent from the cleanup planning documents to date that additional

characterization (e.g. of soil, groundwater, waste dumps etc.) is necessary, and will have to be budgeted for many years to come. This should be specified in the Proposed Plan.

10. A contingency plan should be completed and subject to public review.

We recommend that a site wide contingency plan be discussed in the Proposed Plan and fully delineated in the Record of Decision document. This is needed because the cleanup of a few sites are put off until the future, there are many uncertainties, innovative technologies will be used, and contingent actions should be part of the cleanup plan and thus incorporated into the site wide Record of Decision.

11. The public should be involved in cleanup decisions.

A mechanism for long-term community involvement must be established. As it now stands, public involvement takes place through the Technical Assistance Grant (TAG) with Tri-Valley CAREs and at public meetings and hearings. After the ROD is signed, there are no mandatory public hearings or workshops. Therefore, we would like a commitment from the Lab to find a mechanism for regularly keeping the public informed. A public record of cleanup activities should be updated regularly, maintained and made accessible at a local public library. Public workshops should be held periodically after the last ROD to discuss problems and progress.

12. Cleanup should be given priority over further weapons development.

Perhaps most important of all, Tri-Valley CAREs insists that cleanup of Site 300 be given a priority over further bomb-creating enterprises. Tri-Valley CAREs objects to Livermore Lab increasing its outdoor explosive bomb tests 8-fold, and is participating in an effort to prevent the above-ground blasts with depleted uranium and other contaminants. These new tests will pile additional pollution on top of what is already being cleaned up under the Superfund law. We request, instead of more pollution, that adequate, stable, long-term funding be assured so that the current Superfund cleanup job gets done right. The fiscal year 2007/2008 allocation of about one percent of Livermore Lab's annual budgets to cleanup at Site 300 (and only another 1 percent to cleanup at the Lab's main site) is insufficient.

13. Future activities at Site 300 should be designed to prevent releases.

Releases to soil, air, groundwater and surface water from weapons testing are not acceptable. Any activities, if they must occur, should take all necessary precautions to avoid any releases to the environment of radionuclides and chemical pollutants. Tri-Valley CAREs is leading the struggle to prevent the collocation of "bugs and bombs" at Site 300 by opposing a massive bio-warfare agent research facility that will experiment with deadly biological agents such as live anthrax, plague, mad cow disease and many others.

I ask that you consider these criteria in making cleanup decisions. I want the best and most complete cleanup that is technically possible at Site 300. The on-site workers, nearby residents, the public and the environment deserve no less than our best effort. The Proposed Plan must be revised to include these 13 cleanup elements before being "signed off" by EPA.

NAME: _____

ADDRESS: _____

CITY/ZIP: _____

PHONE/EMAIL (OPTIONAL) _____