



CEASE FIRE Campaign

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EPA Document Manager
National Nuclear Security Administration
Livermore Field Office
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SENT BY ELECTRONIC MAIL

RE: EA-2076: Proposed Increase in the Weight of Explosives Detonated at Lawrence Livermore National Laboratory Experimental Test Site, Site 300

The Proposed Action by the National Nuclear Security Administration is to increase the weight of explosives used at the Lawrence Livermore National Laboratory (LLNL) Experimental Test Site (Site 300) Building 851 Firing Table up to 1,000 lbs/day up to 7,500 lbs/year. The explosives weight is the actual mass, in pounds, of explosive mixtures or compounds for an experiment. Currently, research and development activities at LLNL's Site 300 Building 851 involve detonation of explosives up to 100 lbs/day up to 1,000 lbs/yr, according to the public notice.

The Proposed Action would not involve detonation of radioactive materials, according to the applicant. However, toxic and radioactive contaminants, such as Uranium 238 – released and dispersed by historical open-air burning/detonation – are still present in soils at Site 300. Therefore, it is reasonable to expect that the proposed larger detonations would cause and exacerbate the re-suspension of soil contaminants to the air and surrounding environment, posing a risk to human health and the environment.

The Environmental Assessment (EA) is markedly deficient in its assessment of risk to children and expectant mothers. As the applicant is well aware, it is the policy of the U.S. Environmental Protection Agency (EPA) to consider the risks to infants and children consistently and explicitly as a part of risk assessments generated during its decision making process, including the setting of standards to protect public health and the environment.

The EA is also deficient in analysis of technology costs, focusing on direct short-term costs. For example, the cost analysis of closed detonation chambers does not include the expected economic benefit of reduced ecological, environmental, health, remedial, investigative, site closure, residual contamination burden, impacts to drinking water, and other life-cycle costs.

And finally, the Cease Fire Campaign objects to the continued open air burning and detonation of explosives and related munitions wastes at the Lawrence Livermore National Laboratory based on the availability of safer advanced alternatives and the excessive risk to human health and the environment.

By definition, open burning and detonation result in the uncontrolled release of toxic pollutants to the environment. These toxic emissions endanger public health by contaminating air, groundwater and soils near these operations. Military personnel are often the most exposed to these toxic pollutants, along with nearby communities. Across the country, hundreds of communities and thousands of military personnel have felt the adverse effects of these toxic pollutants.

The Cease Fire Campaign is a national coalition of more than 60 environmental, labor, veterans service and social justice organizations. Our campaign seeks to protect human health and the environment by calling for the immediate implementation of safer alternatives to open air burning, detonation and non-closed loop incineration/combustion of military munitions. These alternatives must incentivize waste prevention and

recycling; prevent, to the greatest possible extent, the release of toxic emissions and pollutants; and advance the principles of environmental justice by assuring that all people enjoy the same degree of protection and access to the decision-making process.

The following documents are to be considered part of our formal public comment:

EPA Region 4: Issues with OB OD Powerpoint Presentation April 2016

<https://cswab.org/wp-content/uploads/2015/10/EPA-Region-4-Issues-with-OB-OD-PPT-April-2016-.pdf>

CEASE FIRE Fact Sheet: Alternative Technologies Approved Deployed Sites 2017

<https://cswab.org/wp-content/uploads/2017/03/Alternative-Technologies-Approved-Deployed-Sites-2017.pdf>

Distribution and Fate of Explosive and Propellants in soil 2012 Pichtel

<https://cswab.org/wp-content/uploads/2015/10/Distribution-and-Fate-of-Explosive-and-Propellants-in-soil-2012-Pichtel.pdf>

Production of Dioxins and Furans from Open Burning Propellants 2011

<https://cswab.org/wp-content/uploads/2015/10/Production-of-Dioxins-and-Furans-from-Open-Burning-Propellants-2011.pdf>

Los Alamos National Laboratory Notice of Disapproval 2012 (NM)

<https://cswab.org/wp-content/uploads/2017/04/Los-Alamos-Notice-of-Disapproval-2012.pdf>

Picatinny Arsenal Depleted Uranium in Soils at OBG Groundwater Assessment Report 2003 (NJ)

<https://cswab.org/wp-content/uploads/2017/04/Picatinny-DU-in-Soils-at-OBG-Groundwater-Assessment-Report-2003.pdf>

CEASE FIRE Fact Sheet: Health Effects of Burning Emissions 2016

<https://cswab.org/wp-content/uploads/2015/10/Fact-Sheet-Health-Effects-of-Air-Emission-from-Munitions-Disposal-Cease-Fire-FINAL.pdf>

Upper Cape Cancer Incidence Study Massachusetts 1991 (MA)

<https://cswab.org/wp-content/uploads/2015/10/Upper-Cape-Cancer-Incidence-Study-Massachusetts-1991.pdf>

Vieques U.S. Navy Bombing and Infant Health 2016 (PR)

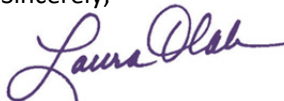
https://cswab.org/wp-content/uploads/2015/10/Vieques_bombs_babies_effects.pdf

Radford Characterization OB Air Emissions Drone Study 2017 (VA)

<https://cswab.org/wp-content/uploads/2017/03/Radford-Draft-Air-Emissions-Report-OBG-42798727.pdf>

If links do not operate, all of the above documents are found on www.CSWAB.org. Click on CEASE FIRE at the top of the page, and then LIBRARY. If you have any problems accessing any files, please let me know and I am happy to send as a .pdf attachment.

Sincerely,



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