

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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In the Matter of	:	
	:	Docket No. 72-22
PRIVATE FUEL STORAGE	:	ASLBP No. 97-732-02-ISFSI
L.L.C.	:	
	:	Deposition Of:
(Private Fuel Storage	:	<u>BRONSON W. HAWLEY</u>
Facility)	:	
	:	

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Deposition of BRONSON W. HAWLEY, taken at the law offices of Parsons, Behle & Latimer, 201 South Main, Suite 1800, Salt Lake City, Utah, on the 11th day of May 1999, at the hour of 1:05 p.m., before David A. Thacker, a Certified Shorthand Reporter, Registered Professional Reporter, Utah License No. 22-105417-7801 and Notary Public in and for the State of Utah.

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ASSOCIATED PROFESSIONAL REPORTERS, L.C.

Deposition of: BRONSON W. HAWLEY

PAGE 13

13

Q. That's a declaration of Bronson Hawley, that the statements contained in the State of Utah's responses as objections to the applicant's first set of formal discovery requests with respect to Contention K, specifically Utah Test and Training Range and Hill Air Force Base, are true and correct to the best of your knowledge, information and belief. Is that correct?

A. That is correct.

Q. Did you review those answers, or did you see those answers?

A. I reviewed a draft copy.

Q. Do the answers filed in the actual response that we just looked at, do they correspond to what you saw?

A. To the extent I just read through them, they do. But in the amount of time I didn't review extensively the 64 page document.

MR. BARNETT: I'd like to introduce this as Exhibit No. 2. This document is entitled Description of Activities for Utah Test and Training Range, May 1997, Prepared by Bronson W. Hawley, Division of Solid and Hazardous Waste, Department of Environmental Quality, State of Utah. And it's Bates No. UT-19250.

PAGE 14

14

(Exhibit No. 2 marked.)

Q. (BY MR. BARNETT) Was Exhibit 2, is that the document you were referring to earlier?

A. That is the document that I referred to earlier.

Q. That you prepared on the UTTR?

A. Yes.

Q. When did you prepare that document, do you remember? Oh, it says May 1997. Is that correct?

A. Yeah. I think that that was the original preparation date for that.

Q. Are you familiar with the flight operations that involve Hill Air Force Base, the Utah Test and Training Range, and Michael Army Air Field on Dugway Proving Ground?

A. Not extensively. Any primary work out there is environmental, and flight operations are not directly related to the environmental side of things. Other than how they--how those flight operations and particularly dropping bombs, impact the environment.

Q. Are you familiar with the locations of where bombs are dropped?

A. Yes.

Q. Are you familiar with the flight patterns

PAGE 15

15

or flight paths of the aircraft that drop the bombs?

A. No. Not extensively. General knowledge from watching them. But I have no specific knowledge of their flight paths, approach, retreat.

Q. Just a point of clarification. Are you familiar with respect to the dropping of bombs and where that takes place, or the firing of weapons, are you familiar with what takes place around Michael Army Air Field? I don't want to keep asking you about that if you're not.

A. I'm not.

Q. I'm sorry?

A. I am not.

Q. You're not?

A. Familiar with activity. Michael Air Field is on Dugway Proving Ground. That's not one of the facilities I'm responsible for.

Q. So you're responsible for Hill and the UTTR?

A. Correct. This map--

Q. This map refers to the map entitled Hill Air Force Base, Utah Test and Training Range, North and South.

A. The targets, et cetera, are the locations of the primary targets.

PAGE 16

16

Q. As indicated on this map?

A. Correct. This is actually the best knowledge I have of target locations, where they actually drop bombs.

Q. I'd like to introduce this map as Exhibit No. 3. It's entitled UTTR Military Air Space, Western Utah and Eastern Nevada.

(Exhibit No. 3 marked.)

Q. (BY MR. BARNETT) If you would look at this map, Exhibit 3, where there's a symbol marking military training targets, facilities, et cetera. Does that correspond, do those symbols correspond to where you know military targets to be within the UTTR?

A. Yes.

Q. That's an accurate--to your knowledge, that's an accurate depiction?

A. Yes.

Q. What's the basis for your familiarity with the activities that take place at Hill and the UTTR?

A. Through site inspections related to characterizing contaminated soil and groundwater. Site visits. And through the compliance inspections I visit operation facilities, ask questions on what the operations are trying to understand what waste

Deposition of: BRONSON W. HAWLEY

SHEET 3 PAGE 17

17

1 streams would come out of those operations.

2 Q. And when you visit the site, is that to
3 perform inspections?

4 A. Yes.

5 Q. And are those inspections, what's the
6 purpose of them?

7 A. RCRA compliance. Compliance with Resource
8 Conservation and Recovery Act. Hazardous waste
9 generation regulations.

10 Q. And aside from site visits, do you have any
11 other familiarity with the activities that take
12 place on Hill and the UTTR?

13 A. Through documents the Air Force submits.
14 You know, as far as corrective action,
15 characterization of contaminated soil and
16 groundwater, they have prepared documents
17 explaining, you know, locations of past
18 contamination to the best of their knowledge.
19 Preliminary assessments of where those locations
20 are, what materials are located there.

21 Q. And those documents are related to
22 hazardous waste that is present on the UTTR and at
23 Hill?

24 A. Yes.

25 Q. Any other documents that you have received

PAGE 18

18

1 from them or have read from the Air Force or from
2 Hill or the UTTR, regarding what takes place there?

3 A. Odds and ends of documents. That's a
4 document that was put out for public participation
5 to involve the public in providing the public with
6 knowledge and determine their interest and
7 involvement in making decisions on corrective
8 action.

9 Q. And when you say corrective action, what do
10 you mean by that? What does that term mean?

11 A. Cleaning up contaminated soil and
12 groundwater.

13 Q. This document is entitled Range Roving,
14 Meeting with our West Desert Neighbors. We'd like
15 to get a copy.

16 A. Okay. And to be honest, I don't know where
17 that document came from.

18 Q. This document, the one entitled the
19 Hill/Wendover/Dugway Range Complex?

20 A. It's a generalized description of
21 activities at UTTR and Dugway.

22 MR. BARNETT: I'd like to introduce this
23 document as an exhibit. It's entitled the
24 Hill/Wendover/Dugway Range Complex by J. Wallace
25 Gwynn, and it's Bates No. UT-37745. Are these two

PAGE 19

19

1 documents the same?

2 THE WITNESS: They certainly look so. Yes,
3 they certainly look the same. This one has a couple
4 of additional on the back, two target maps which I
5 have provided for you during the interview.

6 (Exhibit No. 4 marked.)

7 Q. (BY MR. BARNETT) And the target map pages
8 you referred, to those are Bates number UT-37749 and
9 UT-37750. Is that right?

10 A. 749 and 750, that is correct. Those two
11 pages were not originally part of this document.

12 Q. Of the article.

13 A. Of the article.

14 Q. They're additional.

15 A. This document came--this map came from--

16 MR. NELSON: Refer to the number so they
17 know.

18 MR. BARNETT: 37749.

19 THE WITNESS: This came from one of their
20 corrective action and site assessment documents.
21 And 37750 came from an emergency permit for
22 treatment of hazardous waste, specifically
23 unexploded bombs found on the range.

24 Q. (BY MR. BARNETT) Outside of information
25 provided to the public in a public relations context

PAGE 20

20

1 with respect to to cleanup of waste and other than
2 with respect to the cleanup or treatment of waste at
3 Hill and the UTTR, do you have any other--been
4 provided any other documents by the Air Force
5 regarding the operations that take place there?

6 A. Wow. They've submitted documents an
7 application for a Sub Part X RCRA permit for open
8 burning and open detonation of hazardous waste
9 propellant, other explosive materials that the
10 air force wants to dispose of through treatment.

11 Q. How often do you visit Hill and the UTTR?

12 A. I may visit them two or three times in one
13 month and then not for three months. Most of my
14 visits are associated with corrective action,
15 cleanup of contaminated soil and groundwater,
16 characterization of contamination of the soil and
17 groundwater.

18 Q. And would you say most of your visits are
19 to Hill or to the UTTR?

20 A. Lately I would say more to UTTR, because
21 we're just getting going on identifying locations of
22 contaminated soil and groundwater. So more site
23 visits out there related to that.

24 Q. Are you familiar with the flight operations
25 or the military operations that take place at Hill

Deposition of: BRONSON W. HAWLEY

PAGE 21

21

and the UTTR?

A. Not in detail. Only primarily from observing airplanes flying through the air while I'm conducting a site visit.

Q. Do you believe that flight operations at Hill Air Force Base or the UTTR would pose a significant hazard to the Private Fuel Storage Facility?

A. I think there is that potential.

Q. And what is the basis for that belief?

A. Information that I have received about crashes of F-16s in the west desert.

Q. And what information was that?

A. Generally when they have a downed aircraft, they file a spill report with the Division identifying what materials, primarily jet fuel, was released to the environment as a result of the airplane crash. There's also hydrazine on the aircraft, and there are also munitions on the aircraft, which become waste and by definition of their explosive nature, hazardous waste, and they are released also to the environment at the time of the crash. So they provide the Division with this information.

Q. Going back to Exhibit 3, a map entitled

PAGE 22

22

UTTR Military Air Space. Could you identify where the crashes you know of have occurred?

A. I don't at present have specific knowledge of exactly where they have crashed. I can provide general information. I know they have crashed aircraft west of Wildcat Mountain. I know they've crashed airplanes in the Fish Springs area. And I know they have crashed airplanes on the western part of Utah Test and Training Range.

Q. And that's the north area?

A. Yes. They've also crashed them--there was a recent one that was in the western part of Dugway Proving Grounds.

Q. That would be west of Granite Peak?

A. Right. My understanding was west of Granite Peak. The exact location of that crash site I do not have.

MR. BARNETT: I'd like to introduce this map as another exhibit, this would be Exhibit No. 5, and this is figure 1.1-1 from the Private Fuel Storage Safety Analysis Report.

(Exhibit No. 5 marked.)

Q. (BY MR. BARNETT) Referring to Exhibit 5, the figure 1.1-1.

A. Uh huh (affirmative).

PAGE 23

23

Q. Can you see where Granite Peak and Wildcat Mountain are located?

A. Yes.

Q. And you say the crashes that you knew of, one took place west of Wildcat Mountain?

A. At least one in that area west.

Q. And one took place west of Granite Peak? Somewhere west of Granite Peak?

A. The one on Dugway Proving Ground I do not know the exact location. It's my impression it was west of Granite Peak, but I do not know the exact location.

Q. And the one on the Utah Test and Training Range north area, that was the western part of the area, that would have been west of the Grassy Mountains, is that correct?

A. Correct. North/northwest of the Grassy Mountains.

Q. Can you see the Grassy Mountains on Exhibit 5?

A. Yes.

Q. Can you see also the area marked PFSF site?

A. Yes.

Q. How far are those crashes, those crash sites, from the PFSF site, approximately?

PAGE 24

24

A. Forty to 50 miles.

Q. Do you believe that a crash 40 to 50 miles away would pose a hazard to the PFS site, or planes flying 40 to 50 miles away, would pose a hazardous to the PFS site?

A. I do not.

Q. Then when you said you thought that plane crashes would pose a hazard to the PFS site, why did you believe that?

A. Because I know the planes fly quite a bit closer than 40 to 50 miles away from the PFS site. I also know that the crashes are related to activities around the targets.

Q. And is that Wildcat Mountain that you're referring to?

A. Yes, the primary target west of the PFS site is Wildcat Mountain.

Q. And you believe that flying around Wildcat Mountain could pose a hazard to the PFS site?

A. I would feel that a crash is--I'm aware that most of the aircraft crashes are related to engine malfunction. That's one of the primary causes.

Q. And what's the basis for that? Where did you find that out?

Deposition of: BRONSON W. HAWLEY

SHEET 4 PAGE 25

25

1 A. Primarily hearsay, talking with Air Force
2 personnel.
3 Q. Anyone in particular?
4 A. No one in particular. I have not read the
5 specific, you know, crash reports, but that's my
6 impression.
7 Q. And you believe that the flying that might
8 lead to a crash at Wildcat Mountain, could possibly
9 lead to a crash that would harm the PFS site?
10 A. I would believe that it's possible once the
11 aircraft has had an in-air problem, that, I mean,
12 that they would not have full control as to where
13 that airplane crashes.
14 Q. How far is Wildcat Mountain from the PFSF
15 site, approximately?
16 A. Approximately 25 miles.
17 Q. And do you believe that an aircraft that,
18 say, encountered some difficulty while flying around
19 Wildcat Mountain or over Wildcat Mountain, could
20 crash at the PFS site?
21 A. I would believe that that is possible.
22 Q. Do you know how likely that would be?
23 A. I do not.
24 Q. And do you have any other basis for
25 believing that an aircraft that encountered

PAGE 26

26

1 difficulty over Wildcat Mountain, could crash and
2 harm the PFS site?
3 A. I do not have specific detailed
4 information. I have not read through the crash
5 summaries information for those incidents, and I'm
6 not sure if they provide information as to where the
7 problem originally occurred and where the aircraft
8 eventually crashed.
9 Q. You refer to crash summaries. What
10 documents are those?
11 A. The Air Force provides crash summaries for
12 any downed military aircraft.
13 Q. The document we're looking at is entitled
14 Statement of Opinion, F-16 Mid Air Collision, 7
15 January 1998. We'd like to look at these at the
16 break, if we could do that.
17 A. Okay.
18 Q. Other than over the UTTR, near Wildcat
19 Mountain, and the other locations where you've
20 identified planes have crashed, do you know where
21 the aircraft flying from Hill and the UTTR fly?
22 A. Not in detail.
23 Q. Would you have any way of estimating the
24 likelihood that aircraft flying from Hill or the
25 UTTR, would crash and harm the PFS facility?

PAGE 27

27

1 A. No.
2 Q. Are you familiar with the testing or firing
3 of air-delivered munitions or weapons or missiles
4 that takes place over the UTTR?
5 A. I am familiar in general with what
6 munitions are dropped, but not the specific details
7 of how they are dropped.
8 Q. Are you familiar with the types of
9 munitions that are dropped or fired?
10 A. The only familiarity I have is through
11 reports of unexploded ordnance that has been treated
12 under an emergency destruct permit. They provide
13 summaries of what munitions they treat during their
14 range clearance operations.
15 That is an example of one of their reports.
16 Q. We're referring to a document entitled
17 Explosive Ordnance Disposal Report, signed by
18 Jeffrey S. Smith, United States Air Force, dated 20
19 October 1997. Is this document, this Explosive
20 Ordnance Disposal Report, would this be part of a
21 permit that the Air Force would receive to dispose
22 of ordnance?
23 A. They receive an emergency treatment permit
24 to dispose, to treat these items, and they provide
25 this information as a requirement of that permit.

PAGE 28

28

1 Q. So they provide information like this in
2 order to get the permit? You would have to receive
3 this information before you would issue a permit?
4 A. I issue the permit, they go out and treat
5 whatever they find, and then they provide the
6 information as to what they found and treat.
7 Q. So this is provided afterward?
8 A. That's provided after the issuance of the
9 permit.
10 Q. Do you or does your office, have records
11 like these pertaining to the Air Force's disposal of
12 ordnance, of unexploded ordnance?
13 A. We have those for their operations in the
14 last three or four years I think was when we first
15 started requesting this follow-up information.
16 Q. And do these records typically indicate
17 where the ordnance was found?
18 A. Yeah. They indicate clearing--they
19 indicated as far as a general target area, Kittycat
20 bombing range. Kittycat is the northwest corner of
21 Wildcat Mountain. This document would be for
22 Kittycat bombing range. Kittycat bombing range.
23 This is Kittycat Mountain. So that's the detail we
24 get on where they--on location.
25 Q. Do the unexploded ordnance, do you know

Deposition of: BRONSON W. HAWLEY

PAGE 29

29

1 where it came from in every instance? Do they
2 report which aircraft or which flight the ordnance
3 came from?

4 A. No. No.

5 Q. Do you believe, given your knowledge of
6 unexploded ordnance, that any of the unexploded
7 ordnance on the UTTR would pose a hazard to the PFS
8 facility?

9 A. I would suspect not.

10 Q. Would the treatment or disposal of that
11 ordnance pose a hazard to the PFS facility?

12 A. I would suspect not.

13 Q. Other than where the unexploded ordnance is
14 located, are you familiar with where weapons testing
15 or training involving the firing of weapons takes
16 place on the UTTR?

17 A. Yes.

18 Q. And where would that be?

19 A. Most of the weapons testing that I'm
20 familiar with takes place, and this would be static
21 testing, one of the operations at Utah Test and
22 Training Range, which is described in the document
23 description of activities for Utah Test and Training
24 Range, occurs in the area north of Grassy Mountains.
25 Specifically they do propagation testing.

PAGE 30

30

1 Q. And propagation testing is what?

2 A. Propagation testing is where they stack up
3 a pile of bombs and then build a small sand bunker,
4 and stack up a second pile of bombs, and detonate
5 one of the two piles and see what effect it has on
6 the other. They're essentially attempting to
7 determine how they can store ordnance in the field,
8 and if the enemy sends a missile or a bottom at
9 their, you know, munitions storage area, how can
10 they store it so that one pile doesn't set off the
11 next and they lose the whole arsenal.

12 Q. Would you see that that testing would pose
13 any hazard to the PFS facility?

14 A. No.

15 Q. Would you see that that testing would pose
16 any hazard to the PFS Intermodal Transfer Point that
17 would be located at Rowley Junction?

18 A. No.

19 Q. Are you familiar with any other locations
20 where--other than where unexploded ordnance is
21 found, where the testing or firing of weapons or
22 munitions takes place on the UTTR?

23 A. I'm aware in a non-detailed form that they
24 do cruise missile testing in the general area. The
25 Air Force has reported crashed cruise missiles in

PAGE 31

31

1 the Dugway area, and I remember a report several
2 years ago quite a bit further south. As I
3 remembered, they had a crash down in the Sevier Dry
4 Lake area, southwest of Delta, Utah.

5 Q. Southwest of Delta, Utah. And where is
6 that in reference to Dugway? Here is Dugway.

7 A. Yes. Due south of Dugway.

8 Q. Approximately how far is that?

9 A. Oh, eighty miles south of Dugway.

10 Q. South of Dugway?

11 A. To the Sevier Dry Lake area. I don't know
12 how frequently they test those munitions.

13 Q. Is there anything else you know about where
14 air-dropped or air-launched munitions are fired or
15 tested?

16 A. Other than at specific bombing targets
17 which we've talked about and are located on this
18 map, no, I am not familiar with any other locations.

19 Q. And the map you refer to is Exhibit 3?

20 A. Uh huh (affirmative).

21 Q. Do you believe that the testing or firing
22 of air-delivered munitions or weapons or missiles
23 over the UTTR, would pose a significant hazard to
24 the PFS facility or the ITP facility?

25 A. As long as they keep their munitions on the

PAGE 32

32

1 UTTR property, I would say no, it would not have an
2 impact.

3 Q. Do you believe that those munitions might
4 not stay on the UTTR property?

5 A. I guess I'm not qualified to answer that.
6 I mean I don't really know whether they would or
7 not. I'm not aware of any that have been dropped
8 off the UTTR property.

9 Q. Are you aware of any safety precautions or
10 measures that the Air Force takes to keep weapons
11 from leaving the UTTR property or leaving a target
12 area?

13 A. No.

14 Q. Other than aircraft crashes which we've
15 discussed and air other launched weapons or
16 air-dropped weapons or missiles, are there any other
17 activities that take place at Hill or the UTTR, that
18 you would believe would pose a hazard to either the
19 PFS facility or the ITP facility at Rowley Junction?

20 A. The only other possible activity related
21 to, you know, Air Force's operations that I'm aware
22 of, would be the transportation of hazardous waste
23 missile motors from the Alliant Technologies
24 facility, which is south of Magna, Utah, to the Utah
25 Test and Training Range, north range, along, what is

Deposition of: BRONSON W. HAWLEY

SHEET 5 PAGE 33

33

1 that, I-80.

2 Q. And what's your basis for believing that
3 those activities could pose a hazard to the PFS
4 facility or the ITP?

5 A. Part of my activities at Utah Test and
6 Training Range, is to monitor their treatment of
7 these large missile motors at their RCRA--well,
8 we're in the process of issuing a RCRA sub part acts
9 open detonation permit for treating large missile
10 motors. This is a, what do I call this thing, photo
11 log of a specific treatment event on the 7th of
12 April 1999, where they treated two Trident C4 second
13 stage missile motors. And--

14 Q. These are photographs of the treatment?

15 A. Yeah, they're photographs. The first
16 photograph is a photograph of the flatbed truck with
17 the two missile motors strapped to it. This is at
18 the entrance to the UTR facility. The second photo
19 is of the unloading of the missile motors.

20 Q. And are these other photos, three, four,
21 photos three and four, and then a loose, clear page,
22 two clear pages in between, what do they depict?

23 A. Looks like three and four, we'll call this
24 one five. Five is of--the reason that I would
25 believe that there would be a potential concern, is

PAGE 35

35

1 the time we get up to photo, let's see, five, six,
2 seven shows the initial detonation. They had three
3 balloons tethered in the air, they show up as very
4 small red dots, and they were attempt--they had air
5 samplers attached to each of these balloons.

6 The next photo shows those three balloons
7 still in place a very short time, seconds after the
8 original detonation. By the time you get to the
9 third photo relating to the detonation, you can see
10 that two of the balloons have broken loose. They
11 were originally those two were below this break in
12 the cloud layer, and in this photo they're above the
13 break in the cloud layer. That occurred before the
14 plume ever got to them so they probably didn't get a
15 good air sample. We were monitoring this for
16 releases of contamination to the atmosphere.

17 Q. During a test?

18 A. During--

19 Q. Or during disposal of the--the explosive
20 disposal of the motor?

21 A. Exactly.

22 Q. Do you know what kind of motors are
23 transported along Interstate 80 to the UTR?

24 A. I know that they transport Trident C4
25 second stage motors. They have a contract, I'm not

PAGE 34

34

1 that one of the things that they're very worried
2 about, particularly during unloading, is static
3 electricity. Photo No. 5 is of an Alliant
4 Technologies personnel scanning static electricity.
5 It also shows grounding plates, little wires
6 connecting to ground any static electricity. They
7 seem quite worried about static electricity
8 potentially setting off the rocket motors.

9 Q. Do you know how likely that would be to
10 happen while the motors are in transit on Interstate
11 80?

12 A. I don't know how likely that would be. I
13 would suspect not very likely, unless there was, you
14 know, a problem with the truck, if they had an
15 accident.

16 Q. Are you familiar with the safety
17 precautions that are taken while the motors are in
18 transit?

19 A. No, I am not.

20 Q. What's the purpose of the photos? Why did
21 you take them?

22 A. The purpose of the photos, they were
23 attempting to collect air samples--

24 Q. This was the Air Force?

25 A. Yes. A contractor for the Air Force. By

PAGE 36

36

1 sure if it's a contract, they have an agreement with
2 the Navy, these are actually Navy assets, to treat
3 it's in the range of 3 or 400 of these missile
4 motors over the next few years.

5 Q. And when you say they have a contract, is
6 that the Air Force that's doing this?

7 A. The Air Force is doing the treating for the
8 Navy. I'm not sure how they're all--

9 Q. Do you believe that the transportation of
10 the missile motors along Interstate 80, would pose
11 any kind of a hazard to the PFS facility on the
12 Goshute Reservation?

13 A. I do not believe it would pose any hazard
14 to the PFS facility on the Goshute Reservation.

15 Q. Do you know how big the motors are, how
16 much fuel they carry?

17 A. I do. Let's see here. It would be two
18 second stage rocket motors, net explosive weight of
19 17,000 pounds.

20 Q. Do you know whether any larger motors are
21 going to be taken to Hill to be--I'm sorry--yes, to
22 Hill to be disposed of?

23 A. Yes. They are also, let's see, one
24 additional detonation event will involve the
25 detonation of two first stage Trident I rocket

Deposition of: BRONSON W. HAWLEY

PAGE 37

37

1 motors. Each motor has a net explosive weight of
2 40,000 pounds.

3 Q. And this disposal program, this program
4 disposing of rocket motors, how long will that take?
5 How long will it continue?

6 A. I'm guessing three to five years for--they
7 have just finished a three-year program of treating
8 Poseidon C3 motors. They're closing that program
9 out and they're starting up the Tridents. And I'm
10 not sure--they're starting up the Trident C4 second
11 stage. And they also have plans, according to this
12 letter, to do first stage Trident I rocket motors.
13 I don't know how many of these motors or what time
14 frame. You know, I would guess they are working
15 several years into the future, three to five, just
16 on these assets. What's coming down the road after
17 that I have no information on.

18 Q. Do you know whether those motors are being
19 transported to the UTTR, do you know of any
20 precautions that the State of Utah takes or that a
21 county government would take to protect people or
22 property from any harm that might be caused by them
23 while they're being transported?

24 A. I don't know of any precautions. It would
25 be my belief that they would be transported

PAGE 38

38

1 according to DOT regulations. I'm not familiar what
2 those regulations are or what precautions are
3 associated with those regulations.

4 Q. Do you know of any precautionary
5 evacuations or any movement of people or property
6 that takes place when they're transporting these
7 motors, so that the people would not be harmed if
8 something were to happen?

9 A. I'm not aware of any.

10 Q. Are you aware of any, or have you seen
11 any, studies or calculations that have been done
12 regarding the hazard potentially posed by the
13 transportation of rocket motors?

14 A. I'm not aware of any such studies.

15 Q. Do you know of any concerns that have been
16 voiced by, say, members of the public regarding the
17 transportation of these motors?

18 A. I'm not aware of any.

19 Q. Are you aware that the State of Utah has
20 voiced any concerns of the Air Force or the Navy
21 about the transportation of these motors?

22 A. No.

23 Q. Other than the transportation of rocket
24 motors, are there any other activities that you know
25 of or you believe would pose a hazard to the ITP

PAGE 39

39

1 facility or the PFS facility, that takes place on
2 Hill Air Force Base or the UTTR, outside of the air
3 crashes and the weapons that we talked about?

4 A. I can't think of any other.

5 Q. The RCRA activities that you oversee, the
6 treatment, handling and disposal of waste, do you
7 think that those activities would pose a hazard to
8 the ITP or the PFS facility?

9 A. No, I don't believe they would. These
10 photos of a detonation were all taken from
11 approximately a mile and a half away, and I don't
12 see how, you know, the activities at this site would
13 have any influence further than that.

14 Q. Do you know what the minimum safe stand-off
15 distance would be from a disposal event like that?

16 A. Other than the EOD clears the area for a
17 mile and a half away from--

18 Q. Is that the Air Force?

19 A. That's the Air--yes, EOD is Explosive
20 Ordnance Disposal. They are the Air Force experts
21 on blowing up things.

22 Q. I guess the Air Force is pretty good at
23 that?

24 Let's take a break. We'd like to look at
25 those documents that you brought with you.

PAGE 40

40

1 MR. NELSON: Let me look at the ones you
2 brought.

3 (Discussion held off the record.)

4 (Whereupon, a 15 minute break was taken.)

5 MR. BARNETT: We'll go back on.

6 We'd like to get a copy of all these
7 documents here that you brought with you today.

8 MR. NELSON: That's fine.

9 MR. BARNETT: The photo log is the Utah
10 Test and Training Range, Thermal Treatment Unit, Two
11 Trident C4 (Second Stage) Motors, Detonation at TTR
12 7 April 1999.

13 And just for purposes of clarification we'd
14 like to introduce another exhibit, this would be
15 Exhibit No. 6, and this was the map that we were
16 discussing entitled Hill Air Force Base, Utah Test
17 and Training Range, North and South, and it has the
18 air targets indicated on it. And those are the same
19 targets that correspond to the targets listed on
20 Exhibit 3, which is the map entitled UTTR Military
21 Air Space.

22 (Exhibit No. 6 marked.)

23 Q. (BY MR. BARNETT) Also to follow up.
24 Regarding cruise missiles that are tested or fired
25 on the UTTR. Are you familiar with where those are

Deposition of: BRONSON W. HAWLEY

SHEET 6 PAGE 41

41

1 tested or fired?
2 A. No. Not in detail.
3 Q. Do you know whether those cruise missiles
4 would pose a significant hazard to the PFS facility
5 or the ITP?
6 A. I wouldn't know specifically, other than
7 the reports I've, you know, become aware of that
8 they crash, you know, off range. That they have
9 crashed off range.
10 Q. And which reports are those?
11 A. The crash report that I mentioned earlier
12 of a cruise missile that went down in the Sevier Dry
13 Lake area.
14 Q. That was at the one that was 80 miles south
15 of Dugway?
16 A. Yes.
17 Q. Do you know of any others that have crashed
18 off range?
19 A. I don't know of any others.
20 Q. What inquiry or investigation or analysis
21 did you perform in order to provide information for
22 the discovery responses filed by the State of Utah?
23 And I'm referring to the State of Utah's Responses
24 and Objections to Applicant's First Set of Formal
25 Discovery Requests.

PAGE 42

42

1 A. What was the first part of that question?
2 Q. What inquiry or investigation or analysis
3 did you perform in order to provide information for
4 the responses to the discovery requests?
5 A. I think the only direct inquiry or
6 investigation that I did to assist in that, was to
7 request this target map.
8 Q. And that target map you're referring to is
9 Exhibit No. 6?
10 A. Correct.
11 Q. Is there anything else that you remember?
12 A. No. All of the other information was
13 information that I basically had or had become aware
14 of through my site visits, related to corrective
15 action or inspections of hazardous waste generation
16 compliance section.
17 Q. Do you know a man by the name of Brad
18 Maulding?
19 A. I do.
20 Q. And who is he?
21 A. He is my section manager. My direct
22 supervisor.
23 Q. Do you know what information he provided to
24 support or to assist in the the State's preparation
25 of its responses to these discovery requests?

PAGE 43

43

1 A. I do not know what information he provided,
2 if any.
3 Q. Do you know of any information or any
4 analysis or investigation that he did to provide
5 information for these discovery responses?
6 A. I do not know of any.
7 Q. Did you discuss with him any of the
8 material or information that you provided?
9 A. I don't remember any discussions.
10 MR. BARNETT: That's all that I have.
11 Paul?
12 MR. GAUKLER: I don't have anything else.
13 MR. NELSON: I have no questions.
14 (Whereupon, at 3:00 p.m., the deposition
15 was concluded.)
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PAGE 44

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1 CERTIFICATE
2 STATE OF _____ ss.
3 COUNTY OF _____
4 I HEREBY CERTIFY THAT I have read the foregoing
5 testimony consisting of 41 pages, numbered from 3
6 to 43 inclusive, and the same is a true and correct
7 transcription of said testimony with the exception
8 of the corrections I have listed below in ink,
9 giving my reasons therefor.
10 1. Page _____ Line _____ Correction _____
11 Reason _____
12 2. Page _____ Line _____ Correction _____
13 Reason _____
14 3. Page _____ Line _____ Correction _____
15 Reason _____
16 4. Page _____ Line _____ Correction _____
17 Reason _____
18 5. Page _____ Line _____ Correction _____
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