

Hayes, John

From: shannon rudolph [shannonkona@gmail.com]
Sent: Friday, October 23, 2009 12:57 AM
Subject: ***NRC : Comments

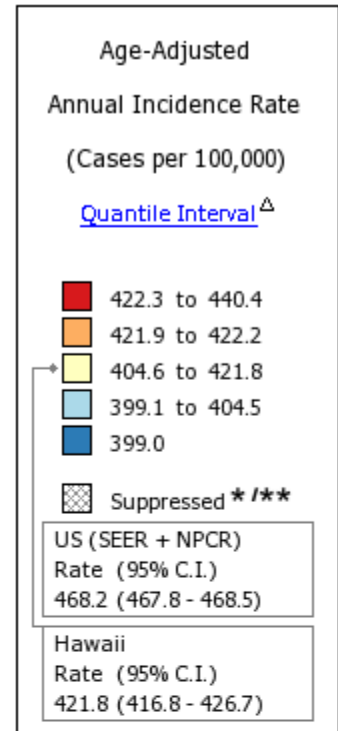
Additional comments to the NRC:

Aloha Mr. Hayes,

Thank you for coming to Hawai'i to address the serious issue of depleted uranium in our state.

I am a very concerned resident. I look at the map below and ask - WHY?

Incidence Rates[†] for Hawaii, 2001 - 2005
All Cancer Sites
All Races (includes Hispanic), Both Sexes, All Ages



Created by statecancerprofiles.cancer.gov on 10/22/2009 11:34 pm.

[State Cancer Registries](#) may provide more current or more local data.

Data presented on the State Cancer Profiles Web Site may differ from statistics reported by the State Cancer Registries ([for more information](#)).

[†] Incidence rates (cases per 100,000 population per year) are age-adjusted to the [2000 US standard population](#) (19 age groups: <1, 1-4, 5-9, ... , 80-84, 85+). Rates are for invasive cancer only (except for bladder which is invasive and in situ) or unless otherwise specified. Rates calculated using SEER*Stat. Population counts for denominators are based on Census populations as [modified](#) by NCI. The US populations included with the data release have been adjusted for the population shifts due to hurricanes Katrina and Rita for 62 counties and parishes in Alabama, Mississippi, Louisiana, and Texas (See [US Population Data - 1969-2005](#) for more information.)

^Δ Number of intervals has been [modified](#) due to data distribution.

* Data have been [suppressed](#) to ensure confidentiality and stability of rate estimates. Counts are suppressed if fewer than 16 cases were reported in a specific area-sex-race category.

** Data have been [suppressed](#) for states with a population below 50,000 per sex for American Indian/Alaska Native or Asian/Pacific Islanders because of concerns regarding the relatively small size of these populations in some states.

National Cancer Institute/U.S. National Institutes of Health

[State Map:](#)

<http://statecancerprofiles.cancer.gov/map/map.withimage.php?15&001&001&00&0&1&0&1&6&0#map>

Out of 18 categories, Hawai'i Island has the highest cancer rate for ten of the different cancer categories. For the nine bases requesting "Permits to Possess" DU from the Nuclear Regulatory Commission, seven out of nine have the 1st or 2nd highest cancer rates in their respective states.

According to National Cancer Institute web site - here are the overall cancer rates for these counties.
(<http://statecancerprofiles.cancer.gov/map/map.noimage.php>)

NRC List:

Fort Benning, Georgia (* Chatahoochee County- 2nd highest category in state)

Fort Campbell, Kentucky (Christian - lowest)

Fort Carson, Colorado (El Paso - 2nd highest)

Fort Hood Texas (Bell - 2nd highest)

Fort Knox Kentucky (Meade- 2nd highest)

Fort Lewis Wash. (Pierce- 1st highest)

Pohakuloa/PTA Hawaii (1st highest)

Schofield Barracks O'ahu (2nd highest)

Fort Riley Kansas (Geary- no data)

fyi: Jefferson Proving Ground (Jefferson/Ripley - 2nd highest)

Yuma " (Yuma - 4th highest)

Aberdeen " (no data)

(Vieques, Puerto Rico high ? - some say up as high as 52%)

Now my question is - isn't it the job of the NRC to gather ALL of the latest facts pertaining to the bases requesting "permission to possess" a nuclear waste dump?

Doesn't it seem to you, that you should look more closely at these unusually numerous health risks for these counties? Are the cancer rates high because of airborne depleted uranium oxides? Residents would like to know FOR SURE, in fact, our local newspaper, West Hawaii Today, did a poll recently, here are the results:

WHT poll results: Do you believe the army about depleted uranium on Pohakuloa?

23% - 135 votes said they believe the army and are not concerned about their health.

76% - 445 votes said they want independent testing for DU

A full 58% - 339 votes said they do not believe a word the army says

The head of our State Dept. of Health, Radiation Branch, says, "the cancer rates are high in Kona because everyone is old." At the time, the average age was thirty seven.

Most residents don't trust the army to test their own "hen house" and we are counting on your agency to get us some monitoring we can count on. Can you do this?

I know I was told by your agency, "this isn't our dept." and that I should contact the Agency for Toxic Substances and Disease Registry. The people living near the former military range of Vieques, Puerto Rico said, this agency's report on their island was bogus and they are asking for the report to be done over, as their cancer rates are reported to be very high, also; some doctors say 52% higher.

I am asking you, ... begging you, for a full E.I.S. of this serious problem and if what many residents suspect to be true is found to be so - with independent monitoring, ...to start the de-commissioning and clean up process at Pohakuloa, Schofield, and other training ranges across the country in possession of DU.

I would also like to ask for a formal hearing but know you make the fifteen page process very difficult and cumbersome for the average individual.

Hawai'i residents and other Americans across the country are counting on the NRC to protect them - you are our only hope. Please don't allow us to be used as Guinea Pigs and please get us some reliable, indisputable monitoring - like... yesterday.

Mahalo,
Shannon Rudolph
P.O. 243 Holualoa, Hi. 9625

Nuclear Regulatory Commission testimony: 8/26/09

King Kamehameha Kona Beach Hotel 6pm Wed.
Hilo -6pm 8/27 Hilo Hi. School 6pm Thur.

Aloha,

Thank you so much for coming to our island to help us try to figure out this mess that the army wants to leave us. I'm no scientist, I didn't read the license and probably wouldn't understand half of it. What I am is, a very concerned resident who has done quite a bit of research and is very worried for my community. I come to you begging for some straight, verifiable answers to residents questions on depleted uranium at the Pohakuloa Training Range and elsewhere in Hawai'i.

I can only put my comments in layman's terms, and I relate to it best, this way; have you every had a friend that you've had to cut loose because they were a pathological liar? You know you can't trust them and they will eventually rope you into their trouble so you have to cut them loose from your life. This is how I and a couple hundred of my fellow residents feel about the military at PTA and I suspect, more than a few O'ahu residents feel this way, too.

To put this into context historically, many times the military has been unable or unwilling to tell the truth to the American people who finance them. For example; I am re-reading a book by Dr. Barbara Rose Johnston, titled "Half Truths-Half Lies, Confronting The Nuclear Legacies of The Cold War".

I realize this type of radiation is from a different source but the same thread runs through these examples. From 1945 to 1963, a group of 400,000 Atomic Veterans were created who are either being minimally compensated or are dead because of nuclear testing. At first, the military told them they were crazy and it took those left alive decades to be compensated.

Our own neighbors from the Marshall Islands had to be relocated to our island because their islands have been contaminated forever; they can't go home again. It is documented fact that we, our military, even used South Pacific Islanders as Guinea Pigs by actually giving them "radiation pills" and told them it was medicine, just to study their demise.

Same with Agent Orange, sick U.S. soldiers fought for decades to be compensated, all the while being told they were nuts. The same with sick soldiers returning with Gulf War Syndrome, the powers that be denied and denied that there was a problem but finally had to admit that there was.

Now bare with me, all of these examples have a common thread.

In 1967, under projects 112, SHAD, and Test Red Oak, our military did chemical and biological testing in our forest reserve north of Hilo, spreading Sarin Gas and other known carcinogens near uniformed residents - breaching all ethical principals and informed consent - using us as Guinea Pigs and telling local officials they were doing "weather testing"; many other similar stories are known throughout the U.S.

None of these historic examples seem related but a common thread runs through them all. Lies. By the military

whom we pay to protect us. We have 824 plus, contaminated military sites at inactive bases in Hawai'i, not even counting active bases such as Pohakuloa; seven are superfund sites and they are doing very little to clean up any of it. This is not my idea of good land stewardship or of good neighbors.

Now, in more modern times, the army swore for years, that they never used depleted uranium in Hawai'i until an Earthjustice attorney found the smoking gun in a pile of correspondence while working on another case. Finally, the army admitted that yes, they did use it.

Shortly after this discovery, I started reading about our nuclear legacy; the more I read the more worried I became for our community.

Epidemiologist and nuclear researcher, Dr. Rosalee Bertell, wrote that "there are over one million "alpha bullets" released per day from processed uranium the size of a period at the end of a sentence." (for 4.5 billion years) I have read that burned or aerosolized uranium dust is easily inhaled or ingested and easily goes airborne with the wind to be resuspended again and again.

I point out three studies that I am familiar with, done by Dr. Chris Busby and Dr. Dan Fahey, that say depleted uranium travels on the wind; I am not talking about natural uranium or "chunks" found on the ground but aerosolized nanoparticles smaller than a virus.

I was across the highway from Pohakuloa in May 2007, with other residents watching radiation monitors for an hour and a half staying at, or below normal background radiation levels of 5 to 20 counts per minute. A visible "dust devil" blew up off the training range and traveled directly over the monitors and all of us. As the dust blew over us, the radiation monitors spiked 4 times, up to 75 cpm. We were horrified.

Our State Dept. of Health was contacted and they came up the mountain to measure. Their protocol for measuring radiation was to practically hold their monitor out the window of their car for a few moments and declare safe levels, which they immediately reported to the Honolulu Advertiser. Cabrera Services was hired to monitor, and flew over a small part of Pohakuloa for a couple of days in a helicopter, which residents think wasn't nearly enough.

Now purportedly, we have seen a 1992 study of the Hawai'i cancer map, by the State Public Health Dept. that shows Kona to have one of the two, highest cancer rates in the state, the other being Pearl Harbor; a giant superfund site. We have no heavy industry here to account for this high rate and no official wants to talk about it.

When asked, the State Health Dept. official for the Radiation Branch said the reason the cancer rate in Kona is so high was because everyone in Kona was old. The average age at the time was thirty seven. Several nurses in Kona say there has been an explosion of Thyroid problems here, also. I myself have a medical problem called Trigeminal Neuralgia, a neurological disorder said to affect 1 in 35,000. I know, or have heard of similar symptoms of shocks in the face of twenty two people in my small area.

I've talked to a few island hunters who have report seeing unusual tumors in sheep and goats near the perimeter of Pohakuloa. I have no idea if any of these problems have anything to do with depleted uranium but its seem somewhat unusual that all of these medical problems are also known symptoms of radiation exposure, or "markers". This is why we sincerely ask for your help to see if any of these problems in humans or animals are related to ingested or inhaled DU.

We do know that a similar situation is happening on a similar island in Vieques, Puerto Rico, the town near a

former, now shut down, navy training range. A 1990-94 study by the Puerto Rico Dept. of Health said cancer rates were 26.9% above the Puerto Rican average. Dr. Rafael Rivera-Castano said this study was out dated and estimated that cancer rates had risen to 52% over the average by 2001.

Residents have gotten no answers they feel are reliable regarding questions we have about DU on our mountain, we've mostly gotten stalling, misinformation, and disrespect. We need some straight answers to our questions and residents are counting on the NCR to protect us as one of our last lines of defense against the military who have a historically poor record of telling the truth. Many residents think many more radiation weapons systems have been used beyond the Davy Crockett, tail fin spotter rounds.

I ask that in addition to absolutely foolproof, verifiable, long term, air, soil, and water monitoring, preferably by independent professionals, for all Hawai'i bases that are contaminated, I plead with you to do some independent testing of sick, life long, Hawai'i residents living downwind, in addition to wildlife near perimeters. It is well past time that we have some straight answers from someone.

I know of one Hawai'i resident who had them self tested for DU at the same lab the British Government used, the test came back with traces of DU but the lab couldn't differentiate between whether it was an old or recent exposure. This lab was shut down shortly after this test, and some residents find this quite curious. This test case didn't count for Hawai'i because this person had only lived here for thirty five years and also grew up next to a similar training range on the mainland.

Let's cut to the chase, IF depleted uranium is discovered in any life long resident or animal, it means the radiation is migrating off of the property. I ask that you make the army follow their own regulation AR 700-48 according to regulation author, Dr. Doug Rokke; to shut down these Hawai'i training areas now, clean up every speck of DU, and take care of and compensate well, any soldier or resident they may have harmed. Personally, I think if widespread contamination is discovered, the army should build us a new hospital or pay to relocate those who care to leave.

I mean no disrespect, but I must tell you, many residents believe that the NCR is in "cahoots" with the military on trying to keep a lid on this issue; I hope and I pray this is not the case. You folks are one of our last lines of defense to get the truth of whether or not we are in danger; the burden of proof should not fall on the residents of our island.

I dearly hope you will take all of our comments seriously, hold the military's feet to the fire on the DU issue, and babysit their every move as your sacred duty to us all; the alleged involuntary Guinea Pigs of the Pacific.

Shannon Rudolph

An open letter to my Congressional delegation

Aloha Dan, Dan, Mazie, and Neil,

I saw this tiny correction in WHT on 9/24, it said, "Environet Inc. is being paid to remove World War II military ordnance from 2,950 acres near Waimea." The previous article on 9/23 stated, "The total cleanup of the former Waikoloa Maneuver Area to remove what the military calls Munitions and Explosives of Concern (MEC) is expected to cost \$680 million more". (Not including the \$152 million already spent, for a total of \$832 million to clean up Waikoloa)

"Because of the size, complexity and cost of the Waikoloa response, it should be considered a long-term action, potentially spanning more than 50 years," states an April 2008 "information paper" the Corps' Honolulu office

supplied.

\$70 million to clean up 3,000 acres comes to \$23,000 an acre. With \$832 million to spend on Waikoloa's 123,000 acres at \$6,500 per acre, would total 2.3 billion. The Kaho'olawe per acre price was \$18,000, so the clean up costs keeps rising.

Up the mountain, at Pohakuloa, we have potentially 100,000 acres that may be contaminated with conventional weapons, not including the 33,000 acre Parker Ranch acquisition. At that price the possible total to clean up PTA could be well over 2 billion dollars, not counting the extremely expensive, additional costs of radiation clean up - if that's actually possible. I have been told the old Waikoloa training area was only used for three years and the Pohakuloa Training Area has been used for sixty years, which will dramatically increase the final cost.

Dan Inouye said, "I look forward to more announcements of additional cleanup efforts on the Big Island." Mayor Kenoi said, "I am extremely pleased to see this important work move ahead under this contract. It represents a significant investment that will make our island safer for residents and visitors, and will provide good jobs for County of Hawai'i residents who will be employed on the project."

While it would seem more rational to not make such a humongous mess in the first place and save ourselves a bundle, there is opportunity in conflict. I see a win-win here, with a new "clean up" industry being born on Hawaii Island to cash in on some of this free money. Many residents could be trained for long term jobs at a good wage, plus health care benefits, and also sent out to work on other Hawaiian Islands, not to mention good jobs for the folks at the Environmental Protection Agency; the Nuclear Regulatory Commission; the Center for Disease Control, the Agency for Toxic Substances and Disease Registry; the Justice Dept.; the Dept. of Interior; and related services or agencies. That's a lot of hotel rooms to fill up and would be a boon to our economy.

We can learn a lot from our sister island of Vieques, Puerto Rico. All it would take to jump start this new industry is for our congressional delegation to ask President Obama to decommission Pohakuloa rather than having the NRC waste their time and budget on giving the Army a "license to possess" a nuclear waste dump on our island, they could get ahead of the game by decommissioning PTA now. And by the way, you can let the NRC know your thoughts on this if you comment by Oct. 27th, to: john.hayes@nrc.gov Ask for an E.I.S. and decommissioning for Pohakuloa.

According to a recent West Hawaii Today poll, 76% of the voters said they wanted independent testing of Pohakuloa, rather than the army doing the radiation monitoring. 58% said they don't believe a word the army says. Since few residents believe them, let's just forget about the Army testing their own hen house and just start cleaning it up; Lord knows we need these new employment opportunities.

Our Representatives in D.C. have been strangely silent on the clean up of Pohakuloa, this would be their chance to be heroes, save our economy, and clean up all contamination on our training ranges. This could happen fairly quickly if our Congressional delegation put their powerful heads together to get the ball rolling and called in some favors to make this happen; this is a fantastic, long term employment project and its certainly "shovel ready".

Besides the 25 residents already trained in ammo retrieval, we can begin this fledgling island industry now if our D.C. reps could put up \$100,000 for equipment, and begin the training and certification process of residents for radiation monitoring; we would more easily trust our own residents to give us the truth.

This is a formal petition and plea to Senators Dan Inouye and Dan Akaka, to Reps. Mazie Hirono, and governor hopeful, Neil Abercrombie, let's decommission, clean up Pohakuloa, and make some big money on this gravy train; its the "sustainable" and "green" solution to our problems.

Shannon Rudolph - Kona

Passed by the Hawai'i County Council: July 2nd, 2008

(We have also had help from some of our state legislators)

RESOLUTION 639-08 URGING THE UNITED STATES MILITARY TO ADDRESS THE HAZARDS OF DEPLETED URANIUM AT THE POHAKULOA TRAINING AREA.

WHEREAS, in the early 1960's the United States Military used the Pohakuloa Training Area for firing a formerly classified weapon, the Davy Crockett recoilless gun, which has created the presence of depleted uranium (DU) in the impact area at the U.S. Army Garrison, Pohakuloa; and

WHEREAS, the World Health Organization has released several reports and scientific studies concerning the health risks from exposure to depleted uranium; and

WHEREAS, depleted uranium is a chemically toxic and radioactive heavy metal with a half-life of 4.6 billion years; and

WHEREAS, depleted uranium emits radioactive alpha particles that can cause cancer when inhaled or ingested and also cause kidney and lung damage; and

WHEREAS, there is a public health need to ensure the safe storage, disposal, and clean-up of munitions and other products or materials containing depleted uranium at the Pohakuloa Training Area to protect all residents of Hawai'i Island; and

WHEREAS, the United States Military is hereby requested, with urgency, to address the potential hazards of depleted uranium at the Pohakuloa Training Area with the following five-point plan:

1. Ordering a complete halt to B-2 bombing missions and to all live firing exercises and other activities at the Pohakuloa Training Area that create dust until there is an assessment and clean up of the depleted uranium already present;
2. Establishing a permanent, high-tech monitoring system with procedures to ensure air quality control;
3. Establishing a citizen monitoring system to work closely with Military experts to assure transparency and community confidence;
4. Hosting quarterly meetings to update and inform the public; and
5. Ensuring permanent funds are available for the monitoring program;

now, therefore,

BE IT RESOLVED BY THE COUNCIL OF THE COUNTY OF HAWAII that the U.S. Military will incorporate the five-point plan to address the potential hazards of depleted uranium at the Pohakuloa Training Area.

BE IT FINALLY RESOLVED that the County Clerk shall forward a copy of

this resolution to Colonel Howard Killian, Deputy Region Director, Army Installation Management Command-Pacific; all members of the Hawai'i State Legislature; Senator Daniel K. Inouye; Senator Daniel K. Akaka; Congressman Neil Abercrombie, and Congresswoman Mazie K. Hirono.

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We cannot hope to end violence against each other until we end our violence against the earth. Wendell Berry