

From: Dlind49@aol.com
Sent: Tuesday, March 17, 2015 10:15 PM
To: Snyder, Amy; panghi@hawaii.rr.com; geomike5@att.net; ja@interpac.net; mh@interpac.net; anne.stewart@mail.house.gov; dlimay7@flex.com; everetto@oha.org; joanconrow@hawaiiantel.net; kaim@oha.org; keomaivg@gmail.com; keolal@oha.org; hawaii@afsc.org; lanny.sinkin@gmail.com; repevans@capitol.hawaii.gov; ronsan2224@aol.com; joshuaboothgreen@yahoo.com; srodrigues@olelo.org; tomasbelsky@gmail.com; wlau@co.hawaii.hi.us; dcs@medcom.com; Dorothy.bowers1@gmail.com; david@bigisland-bigisland.com; davidcorrigan@bigislandvideonews.com; Higuchi.Dean@epamail.epa.gov; kat.caphi@gmail.com; napua4u@yahoo.com; noweokala@yahoo.com; stephen.paulmier@verizon.net; markandster@msn.com; sgd8@hawaiiantel.net; jeffrey.eckerd@doh.hawaii.gov; jenniferjangles@gmail.com; paka@sandwichisles.net; k.young@capitol.hawaii.gov; shannontaylor5679@msn.com; aaron@hawaii.rr.com
Cc: Norato, Michael; Conley, Maureen
Subject: Re: Meeting Summary of Feb 19 2015 Meeting Between the US ARMY and the NRC an...

Ms Snyder: We can not allow hawaii to end up an environmental nightmare such as jefferson proving grounds in indiana.

dr doug rokke
217 643 6205

EPA weighs in on Army plan to leave toxic mess

 [Charlie White](#), @c_write 3:48 p.m. EDT March 15, 2015



A weathered sign greets visitors at a gate near the southern end of Jefferson Proving Ground off Ind. 421 just north of Madison, Ind. (Photo: Charlie White/The Courier-Journal)

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Federal environmental officials want the U.S. Army to analyze the costs and benefits of its plan to end its Nuclear Regulatory Commission license and halt monitoring at the old [Jefferson Proving Ground](#) in Southern Indiana.

The former firing range near Madison, Ind., is where the Army conducted ammunition tests from 1941 to 1995, leaving behind more than 160,000 pounds of depleted-uranium shell fragments plus millions of unexploded conventional shells, live detonators, primers or fuses.

Ken Westlake, a regional coordinator for the Environmental Protection Agency, wrote in a letter that the agency understands that it may not be feasible to clean up remaining unexploded ordnance due to safety and cost issues.

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[Army aims to leave behind radioactive mess](#)

Still, the Army's required environmental-impact statement should examine alternatives including "benefit-costs analysis for each alternative, with special emphasis on modeled future health and environmental costs to society that may occur as a direct result of water and/or air pollution," Westlake wrote.

Westlake's letter states that each alternative also should explain who will be responsible for humans and wildlife at the site, which, according to a state inventory has been home to several species listed as either federally or state endangered, such as the Indiana bat, Henslow's sparrow and Sedge wren.

And if the Army continues proposing to stop environmental monitoring, Westlake said its plan should "provide rationale for the decision not to monitor, preferably using data from other, similar sites, and explain what plans are in place to ensure any future contaminant movement is remediated before migrating off-site."

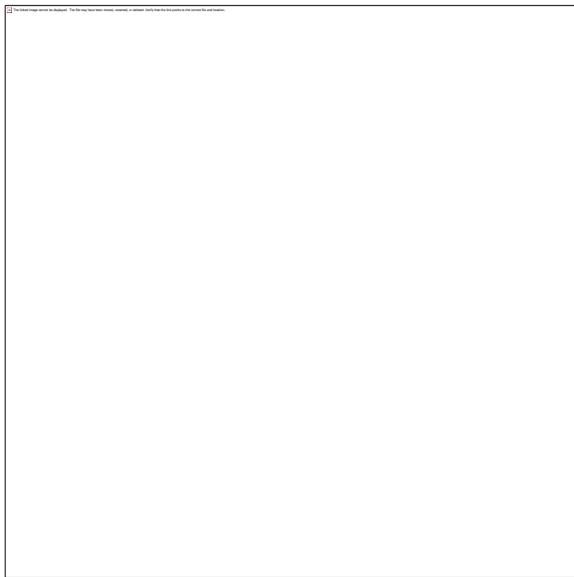
It isn't clear when the NRC might issue a decision, but if it approves the Army's plan as proposed, it would mark the first time it has allowed a license to be terminated with restrictions, something [critics have said](#) would set a bad precedent for other nuclear waste sites across the country.

The restrictions proposed include placement of signs around the fenced-off, contaminated area reading: "CAUTION, RADIOACTIVE MATERIAL"

Critics attack Army plan to leave toxic mess



[Charlie White](#), @c_write 7:07 p.m. EST December 13, 2014



A "Do Not Enter Unexploded Ammunition" noted the danger back in 1997 at the Jefferson Proving Ground near Madison, Ind.(Photo: Copyright 1997 The Courier-Journal)

Critics say it would be a bad precedent to let the U.S. Army retreat from the task of cleaning up or even monitoring the site in Southern Indiana where live-fire tests left behind more than 160,000 pounds of depleted uranium shell fragments plus millions of unexploded conventional shells.

The story about the Army's request to end environmental testing at the Jefferson Proving Ground's former firing range — brought to light in [The Courier-Journal](#) ahead of a local public hearing last week — yielded responses from thousands of miles away about the potential health hazards of the toxic, radioactive metal as it oxidizes into dust then spreads.

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[Army aims to leave behind radioactive mess](#)

"It's a travesty that the Army might walk away without doing a detailed analysis of how they could clean it up," said Lenny Siegel, executive director of the California-based Center for Public Environmental Oversight.

The Army has submitted a decommissioning plan for the site north of Madison, Ind., to the Nuclear Regulatory Commission. The firing range was used as early as 1941 and continued up until 1995. But it was used to test the radioactive, armor-piercing shells from 1984 to 1994, according to the Army.

According to the NRC's latest annual decommissioning report, this would mark the first time the NRC has considered a license to be terminated with restricted use.

The federal Fish and Wildlife Service operates the Big Oaks National Wildlife Refuge on most of the 55,000-acre site about 45 miles northeast of Louisville, though fencing surrounds the 2,080-acre area where the majority of testing was done from 1941 until 1995. The Indiana Air National Guard also uses part of the northern area for bombing practice.

Siegel doesn't believe the NRC should allow the Army to avoid cleaning up the area north of the firing line, where the Army estimates there are about 162,040 pounds of depleted uranium remains in the impact area and 3 million to 5 million shells with live detonators, primers or fuzes.

Experts say radioactive levels of depleted uranium are relatively low in comparison to enriched uranium used for nuclear weapons and energy. A study conducted by Materials and Chemistry Laboratory Inc. for the Army last year concluded it will take "many decades to corrode completely" due to the low-corrosion rates of depleted uranium material in the penetrating darts, which remain largely intact.

Story continues after gallery.



A historical photograph of military readying ammunitions in the Jefferson Proving Ground training area. (Photo: Photo contributed by Jefferson C)

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Historic image of the Old Timbers Lodge used as a base for hunting game birds by Cincinnati industrialist Alexander Thomson. (Photo: Photo contributed by Jefferson C)

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A more recent image of the Old Timbers Lodge used as a base for hunting game birds by Cincinnati industrialist Alexander Thomson. (Photo: Photo contributed by Jefferson C)

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An aerial view of the area south of the firing range taken in 1975 of the Jefferson Proving Ground. (Photo: Photo contributed by Jefferson C)

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A historic image of the stone bridge that crosses Otter Creek in the Jefferson Proving Ground. (Photo: Photo contributed by Jefferson C)

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Historic photographs of weapons and the air base in the Jefferson Proving Ground. Nov. 25, 2014 (Photo: Alton Strupp/The Courier-Journal)

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A historical photograph of the James Richardson farm that was located in the Jefferson Proving Ground training area. (Photo: Photo contributed by Jefferson C)

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Mike Moore, 72, discusses the Jefferson Proving Ground exhibit inside the Jefferson County Historical Society in Madison, Ind. Nov. 25, 2014 (Photo: Alton Strupp/The Courier-Journal)

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The floor of the Jefferson Proving Ground exhibit inside the Jefferson County Historical Society shows the ground free of weeds, which were sprayed with herbicide to make unexploded ordinances more visible. Nov. 25, 2014 (Photo: Alton Strupp/The Courier-Journal)

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A 37mm shell typically given as a memento to retiring employees at the Jefferson Proving Ground. Nov. 25, 2014 (Photo: Alton Strupp/The Courier-Journal)

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Mike Moore, 72, discusses the historic landmarks inside the Jefferson Proving Ground military training area. Moore worked there as an employee up until 1994. Nov. 25, 2014 (Photo: Alton Strupp/The Courier-Journal)

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Ken Knouf, 62, discusses the Jefferson Proving Ground area and the locations of historic sites within it's boundaries. Knouf worked in the area from 1982 to 2010 and was one of the last employees. Nov. 25, 2014 (Photo: Alton Strupp/The Courier-Journal)

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Ken Knouf, 62, left, and Mike Moore, 72, stand in front of a Jefferson Proving Ground military training area exhibit inside the Jefferson County Historical Society center. Knouf and Moore both worked at the military training area when it was in operation. Nov. 25, 2014 (Photo: Alton Strupp/The Courier-Journal)

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But Siegel and others remain concerned about the potential health hazards if the dust is carried as it was in [Colonie, N.Y.](#), where the state Supreme Court in 1980 ordered a manufacturing plant that mainly used depleted uranium to shut down because of airborne releases of uranium compounds.

Siegel first traveled to the Southern Indiana installation in the 1990s, when he met Mike Moore, one of the final Army workers there before it closed. "He was the one who first told me of the risks of the unexploded ordnance," said Siegel, who's among those who've spoken out about parts of the four decommissioning plans the Army has presented since 1999.

The NRC rejected the 2001 plan and others have been withdrawn.

Army studies have focused mainly on the costs of comprehensive cleanup, finding it could cost federal taxpayers billions of dollars. Siegel doesn't doubt cleanup will be costly, but maintains there are "options between all or nothing" that would help restore much of the area.

"It is likely that most of the uranium—thus most of the environmental and human risk — could be removed for a small fraction of the estimated cost," Siegel wrote in a [2003 letter](#) to the NRC.

Siegel added that human safety always a concern with clearing military explosives, which is why the Air Force uses unmanned ground vehicles that are controlled remotely to clear old ranges. And newer technologies may help determine what could be ordnance and what's not, he said.

Siegel also wonders why Indiana leaders haven't done more to contest the decision that the benefits of cleanup are outweighed by the costs.

"A lot of states insist the Army clean it up," he said.

While there has been some discussion in Congress over the last decade about the need to take a closer look at the effects of depleted uranium contamination from military weapons, there's been little traction. Such weapons have been test fired at several U.S. locations.

Doug Weir, a Manchester, England resident who coordinates the International Coalition to Ban Uranium Weapons, agrees with Siegel that the NRC allowing to end its license could have a ripple effect at other test sites such as Hawaii, where two ranges were found to have depleted uranium contamination from a battlefield nuclear weapons system dubbed the Davy Crockett.

After the Army applied for an NRC license there, [NRC staff responded](#) in 2010, in part: "It appears that the U.S. Army's approach to development of the Environmental Radiation Monitoring Plan's is based on the assumption that environmental radiation monitoring is triggered by a certain dose level close to regulatory limits.

"Environmental monitoring is used to determine if material is being released from a facility, in this case the range, which could potentially impact public health and safety or the environment. In developing ERMPs it should not be assumed that DU is not being released from a facility."

Earlier this year, [NRC staff disagreed](#) with the Army's environmental analysis that found "no potential for the release of DU" during controlled burns or as vegetation decays at Schofield Barracks on Oahu.

"So it seems fair to say that if Hawaii is anything to go by, the Army is primarily focused on pursuing its own interests," Weir said.

Reporter Charlie White can be reached at (812) 949-4026 or on Twitter [@c_write](#).

Jefferson Proving Ground

Public comments on the Army's proposal must be submitted by Dec. 18 to Cindy Bladey, Office of Administration, Mail Stop: 3WFN-06-A44M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

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In a message dated 3/17/2015 1:55:29 P.M. Central Daylight Time, Amy.Snyder@nrc.gov writes:

Hello,

I am the NRC Project Manager for the license that the NRC issued to the U.S. Army for depleted uranium from Davy Crockett spotting rounds. I wanted to let you know that the NRC staff will hold a meeting on March 24, 2015 from 9:00 a.m. to 4:00 p.m. (Eastern Time) about this license. The Army plans on submitting its application to add the remaining sites to be licensed. The Army intends to address all of the sites, to include the Army's Hawaiian installations, in its application.

The meeting announcement information can be found at: <http://meetings.nrc.gov/pmns/mtg>. The public is invited to observe this meeting and will have one or more opportunities to communicate with the NRC after the business portion of the meeting but before the meeting is adjourned. If you are interested in calling in to this meeting via a toll-free teleconference, please contact me and I will provide you with the needed information.

Thank you



Amy Snyder, Senior Project Manager

Materials Decommissioning Branch (MDB)

Division of Decommissioning, Uranium Recovery, and Waste Programs (DUWP)

Office of Nuclear Material Safety and Safeguards (NMSS)

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