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18 GREENACTION FOR HEALTH AND ENVIRONMENTAL JUSTICE

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NUCLEAR REGULATORY COMMISSION

IN RE: TETRA TECH EC, INC.

) **DECLARATION OF ANTHONY SMITH**
) **IN SUPPORT OF PETITION TO**
) **REVOKE THE LICENSE OF TETRA**
) **TECH EC, INC.**

A.S.
ANTHONY SMITH DECLARATION

1 I, Anthony Smith, declare:

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3 Radiological Work History & Training

4 1. In total, I have seven years of experience working in the nuclear industry.

5 2. I started my career as a radiation worker in 2002, when I was hired as a "deconner"
6 (i.e. a decontamination technician) to do decontamination work for New World Environmental
7 ("NWE"), a radiological-staffing company. My first radiological jobs were short term assignments
8 at military facilities in Maryland, Virginia, and Alabama. Later that year, I took a job at Hunters
9 Point Naval Shipyard ("HPNS"), where I assisted with characterization surveys to identify
10 radiologically impacted areas in anticipation of future remediation. My first job at Hunters Point
11 lasted about one year, until I was laid off in 2003.

13 3. After my first job at Hunters Point Shipyard, I took and passed the Department of
14 Energy's (DOE) Radiological Control Technician (RCT) CORE Exam. I was previously told I
15 would need to pass the CORE Exam to work at HPNS as a Health Physics Specialist ("HP") when
16 remediation work picked up. I passed the exam in 2003. The DOE CORE Exam covers
17 fundamental radiation concepts and functions performed by HPs (also known as radiation control
18 technicians, or "RCTs"), including mathematics and physical science, sources of radiation,
19 sampling methods, survey instrumentation, dosimetry, and worker safety, among other topics.
20 Passing the CORE exam qualified me to work as an RCT/HP at Hunters Point as well as most
21 other nuclear or radiological sites in the country.

23 4. In addition to passing the DOE CORE Exam, I completed annual testing to
24 maintain proficiency in radiological remediation practices. I also completed various onsite
25 radiation and safety trainings throughout my career. When I worked at HPNS the second time, rad
26 workers were often assigned readings on radiation-related topics to study on their own time, and
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1 HPs were quizzed in a limited way by supervisors at our daily morning meeting. Together these
2 trainings, along with expected prior experience and training, were intended to ensure HPs on the
3 site were informed of proper radiological procedures as well as the health and safety risks
4 associated with rad work. I observed that a number of the HPs did not appear to be
5 knowledgeable or studying on their own as I was when at Hunters Point.

6 Experience at Hunters Point Shipyard

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8 5. In 2006, I returned to work at Hunters Point Shipyard as a Junior HP for New
9 World Environmental and I was promoted to a Senior HP by NWE. Around the end of 2009, I was
10 forced to switch employers to Radiological Survey & Remediation Services, LLC ("RSRS") or
11 be terminated because NWE was losing the sub-contract. RSRS made me a Junior HP for a
12 number of months, and after about eight months promoted me to Senior HP, but my duties
13 remained largely the same throughout my second stint at Hunters Point.

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15 6. Over the course of my later six years at Hunters Point I performed a variety of HP
16 roles across the base. The majority of my time was spent performing building surveys. I also
17 performed soil sampling in the field and within Radiological Screening Yards ("RSYs"), oversaw
18 laborers and provided access control for buildings and Radiologically Controlled Areas ("RCAs"),
19 and worked the Portal Monitor screening vehicles entering and exiting the site.

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21 7. Beginning in mid-2008, I noticed improper rad practices taking place at HPNS,
22 including false soil sampling, incomplete building surveys, falsification of chain-of-custody
23 ("COC") documentation, and data manipulation. In my view, the emergence of Tetra Tech as the
24 primary radiological contractor coincided with the negative shift in culture and bad practices at the
25 site. It is my understanding that while prior to 2008 NWE was the holder of the Nuclear
26 Regulatory Commission ("NRC") radioactive materials license that governed the radiological
27 work performed. Tetra Tech became the NRC license holder about that time that improper rad
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1 practices became a regular event and as a result Tetra Tech gained more control over the rad work
2 performed by subcontractors like NWE and Aleut World Solutions.

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4 Building 351A

5 8. My first experience with improper or fraudulent sampling occurred in the late fall
6 of 2008, when I was assigned to oversee a soil-remediation project in the crawl space under
7 Building 351A. Building 351A was the last building to undergo remediation on Parcel G and was
8 therefore the only work preventing Parcel G from free release by regulators. Building 351A was
9 previously used by the Navy's Radiological Defense Laboratory and was confirmed during our
10 characterization surveys as containing radioactive contaminants exceeding release levels. Areas of
11 the building and the soil areas under the building that could be accessed in a crawl space were
12 identified as containing radioactive materials above release levels that were required to be
13 removed in the remediation process. As part of the Building 351A remediation of the crawl area,
14 there were roughly a dozen laborers in protective gear (rubber boots and respirators) tasked with
15 digging up the soil using shovels and trowels. Tetra Tech also rented a special soil vacuum truck
16 with a long, eight inch hose to suck up the contaminated dirt that the laborers had loosened. The
17 vacuum system deposited the soil in a container designated for low level radioactive waste, which
18 was later shipped off site.

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21 9. During the Building 351A project, fellow HP Josh Hooper and I were responsible
22 for manning the opening to the crawl space and frisking (i.e., scanning the people and equipment
23 for radioactive contamination prior to leaving the Building 351A work area) to ensure they were
24 clean. Once the laborers completed the remediation work under the building, Josh and I were also
25 responsible for post-remediation sampling of the area so that the building could be cleared for
26 release. I asked that Josh and I be provided with respirators because of the large amount of air
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1 borne dust under the building in the crawl area, as well as other standard personal protective
2 equipment. Chuck Taylor, Tetra Tech' RSO representative and field supervisor, refused the
3 request for the PPE respirator. Josh and I took a number of soil samples throughout the crawl area
4 under building 351A and placed in containers for the samples to be tested by the laboratory at
5 Hunters Point. Documents of the samples were done to show where the sample was taken, at what
6 time, by who, and related information and kept with the samples. All together, the remediation
7 process took several weeks to complete.
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9 10. A day or two after Hooper and I finished post-remediation sampling and delivered
10 the samples to the on-site laboratory, we were approached by HP Supervisor Steve Rolfe and
11 asked to attend a meeting with management at Tetra Tech's HPNS office that was close to the end
12 of the day. Approximately a dozen senior managers were present at the meeting, including RSRS
13 Vice Presidents Daryl DeLong, Brian Henderson, Tetra Tech's Project Manager Bill Dougherty,
14 and Construction Superintendent Dennis McWade. Mr. Bert Bowers, the NWE RSOR was not in
15 the meeting, and that was a puzzle to me as the meeting progressed. During the meeting
16 Dougherty explained to us the cost and effort that went into the Building 351A remediation,
17 asking us with words to the effect "Do you know how much it costs us to rent that machine for
18 two weeks?" Dougherty also told us that the test results of the post remediation soil samples
19 showed some of the highest radioactive readings ever seen on the Hunters Point site. After
20 discussing the cost of the delay having these elevated soil samples would cause, namely that the
21 laborers would have to return to do more digging with the vacuum truck and we would need to
22 take more post-remediation samples, Dougherty instructed us to destroy the existing highly
23 contaminated radioactive soil samples from Building 351A and any related documentation, and
24 directed us to take new samples from areas in the crawl space known to be clean.
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11. Hooper and I returned to Building 351A to take new samples as we were told. We took the samples from areas that had been marked with flags, which were placed by engineers that had been directed to put flags in areas that were previously identified through surveys as consistent with natural background radiation levels that would get lab clearance. The new samples were then used to clear Building 351A and secure free release of Parcel G. In other words, the new samples did come from Building 351A, but were done to intentionally avoid the areas that had been shown to still have high radioactive contamination under the building. The re-sampling was taken selectively so that additional remediation would not be required, although the rules and procedures did require additional remediation due to the true soil sample lab results. To my knowledge, the contamination in Building 351A was never remediated.

Parcel A Cesium-137

12. The fraudulent sampling at Building 351A was not an isolated incident; in fact, it was just the first of many. For example, less than a year later, around July or August of 2009, I was assigned to HP Supervisor Justin Hubbard's crew and tasked with performing surveys and sampling as part of a project remediating sewer lines along Fisher Avenue and Spear Street. At the beginning of the project, Justin Hubbard directed me to take a background sample from somewhere in a nearby adjoining area that did not have radioactive contamination in order to establish naturally occurring levels of radiation for the sewer line work. I chose to take a sample along the border of Parcel A – an area we were told had never been used for radiological purposes and was already transferred to the City of San Francisco for development because it was believed to be free of any radioactive contamination above free release levels. Bordering Fisher Avenue there was a retaining wall that descended in height as it ran east to west parallel to the street, and behind the wall was a hill that went up towards the Parcel A development site. The retaining wall was about waist-high near the stop sign at the intersection of Fisher and Spear, about 20 feet from

1 the light pole. I reached over the wall and dug a hole to take the sample. I used my trowel to dig
2 about 6 inches into the ground, and then removed some soil from the bottom of the hole, and
3 placed the soil from the bottom of the hole in a plastic sample jar. I then walked back to our
4 meeting point and gave the jar to Justin Hubbard, who then took the sample to the on-site lab. In a
5 breach of proper procedure, no chain-of-custody (COC) form accompanied the sample.

6 13. The next morning or so, Justin Hubbard brought the soil sample out to our meeting
7 spot and told me the sample tested "hot" for radiation at a level of two to three picocuries of
8 cesium. Other members of the project crew at the meeting point that morning included HPs Ray
9 Roberson, Carey Bell, and Jeff Rolfe. Hubbard stated to all of us in regards to the soil sample from
10 Parcel A - "get rid of it and not say a word," or words to that effect. I took the sample back to the
11 same area above the wall and dumped the soil back into the hole I originally took it from. I then
12 disposed of the plastic sample jar in a bin for contaminated radiological waste. In the end, we used
13 the established background area near building 505 for the background sample for the Fisher Ave.
14 and Spear St. projects, although the building 505 area was quite some distance from the street
15 project. I am aware that the Navy and EPA established release criteria levels, so that soil had to be
16 remediated due to health and safety concerns if it tested above those levels. Different radioactive
17 levels were set for each specific type of radioactive material we encountered at Hunters Point.
18 The release level for cesium-137 was 0.113 picocuries. The cesium-137 results from the sample I
19 took near Parcel A as reported as 2 to 3 picocuries was approximately 18 to 26 times more
20 hazardous than the safety level set by the Navy and the state and federal regulators that oversaw
21 the Hunters Point project.

22 14. As far as I am aware, I was the first and only person to take a sample of the soil at
23 Parcel A. To my knowledge the radioactive contamination I found in Parcel A was not further
24 investigated or remediated.

Fake Soil Sampling

15. After the Building 351A and Parcel A cover ups, fraudulent sampling became a regular occurrence for me and the teams I worked with at Hunters Point. From time to time I was assigned to work with a team of HPs under the direction of Tetra Tech supervisor Steven Rolfe. When we were doing soil sampling, and that soil sampling was to check on whether the remediation work that had been done was effective, with increasing regularity I and the team working for Mr. Rolfe were directed by Mr. Rolfe to take fake soil samples. In this early period of 2009 to early 2010, when post-remediation sampling was to be done, more and more Mr. Rolfe told me and the other HPs to cheat and take false soil samples. To do the post-remediation soil samples properly, engineers were to mark on the ground where we were to take soil samples because those spots were supposed to have the highest radiological readings. By taking the samples from the high reading areas it was presumed that if those areas were tested and came in under the Navy's and regulators' "release criteria" standards, then the entire area should be within the release criteria standards. When Mr. Rolfe told us to cheat by taking false samples, he instructed us to look like we were taking the samples from the marked spots, but to actually put soil into the sample containers that would go to the lab from nearby soil that was not marked by the engineers as the hot spots for rad contamination.

16. After a number of months of taking fake soil samples that were close to the marked areas, Mr. Rolfe told us that Tetra Tech bosses were not happy because the fake soil samples were being tested by the lab and still coming back with lab results that were too high and above release criteria, so remediation would have to be re-done. Mr. Rolfe explained that Tetra Tech EC did not want to have to re-do the remediation because of the lab failures, and we were to get fake soil samples from areas from now on that we knew would be clean of elevated radioactive contamination.

17. Beginning around 2010, I was doing soil sampling, called "dirt work" – in what we called "the triangle area" near Building 707 and later around the 500 series of buildings. Due to the directions of Mr. Rolfe, I was instructed that I was to get soil that was known to be clean and pretend that soil came from the Building 707 area and later the 500 building series we were assigned to sample. I had learned that soil in certain parts of the shipyard was clean and could easily be swapped with other samples in order to quickly obtain lab and regulatory clearance due to the fake samples of clean soil we submitted.

18. More specifically, I knew that the soil in a sewer trench in front of an area of the 500 series of buildings as well as the soil underlying the foundation of the old Hunters Point movie theater was clean serpentine or “green” dirt, and that the soil underneath the two palm trees near the old pump house (Building 521) also near the old theater was clean sandy soil. At the direction of HP Supervisor Steve Rolfe, other HPs and I would wait until lunch time or after work hours, when there was no one else around, and would go down to the clean sewer trench or later to the theater or palm trees depending on the type of soil needed. There, we would fill up a 5-gallon bucket with clean soil and bring it back to the Conex (a shipping container which served as a makeshift office) where Steve Rolfe, Tina Rolfe (Steve’s wife), and Rick Zahensky worked with the samples. Inside the Conex the Rolfes and Zahensky would empty the true soil samples taken from the areas the samples were supposed to be taken from into another 5-gallon bucket and replace the sample with the clean soil from one of the three areas we got the clean soil from. Other HPs and I would then dump the soil from the real samples in open sewer trenches around the site before they were backfilled.

19. The practice of swapping clean dirt for samples really picked up in frequency while working in the Building 707 triangle area. Remediation in that area had been going on for about two years, and after three or four rounds of remediation and post-remediation sampling it still

1 wasn't clean of radioactive contamination above release levels. Frustrated by the cost and delay,
2 Steve Rolfe directed me to "just go get some clean dirt." I followed Rolfe's direction and obtained
3 some sandy soil from underneath the two palm trees near building 521. I then brought the soil
4 from the palm trees to Rolfe who used the soil to submit fake soil samples for the 707 triangle area
5 to the laboratory for testing to secure release of the area.

6 20. At the time of the Building 707 triangle area remediation and throughout the 500
7 series of buildings falsifying soil samples through the use of replacement clean soil was almost an
8 everyday occurrence. The switching of real samples with the fake clean soil happened pretty much
9 every day during my last year and a half or more at the shipyard. I was released from Hunters
10 Point in September of 2012. I would estimate that I and my team switched real samples with fake
11 clean dirt for the samples between 800 and 1000 times. I understand from my work at Hunters
12 Point, after hours interaction with others, and my review of records, that Justin Hubbard's team
13 also engaged in similar fake soil sample submissions to the lab for years.
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16 Chain of Custody Forms (COC)

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18 21. In addition to replacing suspected radioactive soil samples with soil from other
19 areas that was known to be clean to obtain fraudulent laboratory testing results, the COC
20 documents filled out for soil samples were regularly falsified. Proper procedure requires that you
21 have a COC document for each sample taken. Proper procedure also requires that the rad tech that
22 does the sampling not only fills in the COC but is also the one who maintains continuous custody
23 of the COC along with the samples until custody is transferred to someone else and signed off as
24 taking custody. It was expected from the COC that each HP would retain the samples and take the
25 samples to the lab, never releasing the sample and COC from possession until the COC and
26 sample was turned into the lab. The COC form is supposed to accurately reflect the time and place
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1 the sample was taken and to remain in continuous possession of the sampler until samples are
2 turned over to the lab. The practice became at Hunters Point for the Rolfe team that Tina Rolfe
3 would fill out COCs in the office or conex while we worked in the field taking samples and then
4 have the rad techs sign off on the COC as if they themselves had filled in the information. Tina
5 Rolfe would simply cycle through the names of the HPs on my sampling crew – Rick Zahensky,
6 Jeff Rolfe and I – when filling out COC forms, regardless of who actually took the sample. On
7 some occasions Tina Rolfe listed herself as the sampler despite the fact she almost never worked
8 in the field, and had not taken those samples. I rarely filled out COC forms during my time at
9 Hunters Point, and almost never delivered my own samples to the lab, perhaps once a month.
10 Because the trip to the lab was considered leisure time, Steve, Tina, or Jeff Rolfe or Rick
11 Zahensky almost always delivered the samples. I also suspect that Steve Rolfe may not have
12 trusted that I would not say anything to the lab workers about the COC being wrong, or the false
13 soil samples, so that may have contributed to why I seldom made the sample delivery. When I did
14 make sample deliveries to the lab most of the time Steve Rolfe came with me, again maybe to
15 make sure I did not say anything.

18 22. Looking at the COC forms from Hunters Point displays that the forms are falsified.
19 First, many soil sample COCs indicate samples were taken exactly every five minutes apart. In
20 reality, sampling often takes longer than five minutes because some surfaces are difficult to
21 penetrate, the sample must be properly bagged and labeled, and then sampling equipment must be
22 decontaminated by being double-washed and air dried. In my experience, it is impossible to take
23 soil samples every five minutes if you follow proper procedures. Second, the difference in
24 handwriting between the sample times and the sampler information shows that the form was filled
25 out by two different people. I can easily identify the difference in the forms containing only my
26 handwriting and those containing Tina's handwriting and my name. Lastly, I remember occasions
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1 when Tina Rolfe would fill out a COC as if I was sampling in one location, when I was actually
2 working in an entirely different area that day. For example, I recall one occasion when I took
3 samples near Building 707, but the COCs said I was sampling in the Building 500 series.

4 23. Having someone pre-fill the COC makes it impossible to determine where and
5 when a particular sample was taken and seriously compromises the integrity of the sampling
6 results for Hunters Point. From my time at Hunters Point, I understand that the other teams, such
7 as Justin Hubbard's, also used fake COC documents for samples.

8 Sham Building Surveys

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10 24. During my time at Hunters Point, a large part of my time was spent conducting
11 building surveys. Building surveys generally entailed using a Ludlum 2360 with a detector to
12 identify and confirm impacted areas in need of remediation. At HPNS, proper building surveys
13 were conducted in up to three phases: Class 1, which required scanning 100% of the survey areas
14 in a space known to have rad contamination or a high likelihood of rad contamination, using a grid
15 system, comprising the floor and lower walls of the building; Class 2, which my supervisors
16 described as the upper wall areas of the building, and Class 3, the areas the supervisors stated were
17 the ceiling and roof areas of buildings. I understand that policies defined Class 1, 2, and 3 on
18 other criteria, but the way we used it in the field was based on the floor, walls, or ceiling and roof.
19 In my time at Hunters Point I conducted building surveys in almost all parts of the base, including
20 Parcels C, E, and G.
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22 25. Due to the amount of time required to perform a proper building survey, the
23 practice at Hunters Point was to scan the high probability areas and fake the rest. Although we
24 mostly performed Class 1 surveys, the Class 2 and 3 surveys were falsified by holding our
25 instrument in place, or stationary, so as to generate the required amount of data, but having
26 nothing to do with real scanning that was required. On numerous occasions my crew and I were
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1 instructed by HP Supervisor Steve Rolfe to "just get numbers," which we would do by simply
2 holding the 2360 detector in the same spot, or setting it down in one spot for up to 30 minutes
3 while readings were recorded. I specifically recall "just getting numbers" at Building 707,
4 throughout the 500 series of buildings and foundation footprints, buildings 351, 351A, 411, 401,
5 414, 406, 144, 146, 130, 103, 113, 521, and possibly building 203, although I am not sure on
6 building 203. I know we followed similar flawed procedures at numerous buildings that the
7 Navy's studies had designated as rad-impacted.

8 Data Manipulation

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10 26. To the extent that building surveys were properly performed, and even when they
11 were not done properly, the data collected was often changed to reflect results close to background
12 radiation levels. I know this because I saw it being done. In approximately 2010, when I was in
13 the trailer uploading my instrument I noticed Tina Rolfe on the computer manually changing data
14 uploaded from previous scans. I eventually discussed the issue with other HPs and learned that
15 Tina Rolfe and Rick Zahinsky were told to change numbers up or down in order to have readings
16 within normal levels of radiation. I also heard Steve Rolfe chew out Zahensky and Tina Rolfe for
17 not changing the numbers sufficiently. Rick told me that at times he would take the data
18 information on a thumb drive and a work computer home and work until the early hours of the
19 morning changing thousands of numbers, all to misrepresent the data to falsely show that
20 conditions were normal at the site and avoid additional radiological remediation work.

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22 27. After learning that data was frequently changed, I raised my concerns with the
23 practice to my then supervisor Justin Hubbard. Hubbard told me that they were doing it
24 everywhere else on the site and that was what management wanted. I also talked to Ray Roberson,
25 Joey Cunningham, and Rick Zahensky about the issue and they all had a similar response: Tetra
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1 Tech supervisors knew about the number tampering and directed that it take place; the quicker the
2 area was deemed releasable, the faster Tetra Tech could get paid for completion of the project.

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4 Radioactive Soil Shipped Off Hunters Point

5 28. When I returned to work at Hunters Point in 2006, a system was being used to scan
6 for radioactive contamination at Hunters Point excavated soil. The system that was used was a
7 large conveyor belt had a level of about 6 inches of soil spread on the belt. The belt would move
8 under a group of radioactivity sensors that were set to alarm if radioactive contamination was
9 detected above a certain set level. If soil triggered the radiation detector alarms the soil on either
10 side of the sensors for a certain number of feet was to be removed from the belt and put in low-
11 level radioactive containers for shipment to federally approved disposal sites. If the soil cleared
12 the sensors, the soil was piled up in an area designated for soil to be shipped off Hunters Point to
13 facilities that received soil that did not contain radioactive contamination.

14
15 29. I was aware of the conveyor belt system and its set up, but I did not work that
16 operation. Sometime in 2006, I learned that it was discovered that Joe Lavell, a Tetra Tech
17 construction superintendent a supervisor over the conveyor belt system, had increased the speed of
18 the conveyor belt system far faster than had been approved. I also learned that Gary Wilson, a rad
19 supervisor over the conveyor belt system, and Jane Taylor (an assigned Junior Rad Tech) silenced
20 the rad detector alarms. I was informed that the conveyor belt system had been operated at 6 to 9
21 times the approved conveyor belt speed, and with no radiation detector alarms operating.

22
23 30. Based on my knowledge of how the radiation detectors worked, the sensors are
24 much less able to detect radioactivity at higher speeds. I was informed by others at Hunters Point
25 that Joe Lavell and Gary Wilson explained that they set the conveyor belt (Joe Lavell) to run at the
26 higher speeds because the alarms kept going off at the approved speed and virtually none of the
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1 soil was able to be cleared as free of radioactive contamination within approved levels. Gary
2 Wilson explained that he changed the radiation detector alarm settings so the alarms did not
3 sound.

4 31. The soil that was improperly scanned through the conveyor belt system at too fast a
5 speed and with no functioning alarm was improperly allowed to be shipped off Hunters Point and
6 was shipped off Hunters Point as non-radioactive material. After it was discovered that the
7 conveyor belt system had been run far too fast, some thousand plus cubic yards of soil still
8 remained in piles that had been improperly cleared by the conveyor belt system. I and other HPs
9 were assigned to help scan the soil that remained in the piles. HPs such as myself scanned soil
10 picked up by front-loaders, however the soil was two to three feet in thickness so our sensor were
11 ineffective in sensing radiological contamination much below six inches. If our sensor, which
12 were not fully effective due to the multiple feet of thickness to the soil, did not detect high
13 radioactive readings the soil was deemed "cleared" and sent in trucks to go off site. The soil then
14 regularly failed the Portal Monitor screening. However, HPs were restricted to scanning the truck
15 trailers of soil through the bed and side of the truck, which our instruments were not effective to
16 effectively detect the radiological contamination beyond about six inches.

19 32. At no time was I informed that any effort was made by Tetra Tech, the Navy, or
20 others to alert the towns, counties, landfills, and others that received the large amount of soil that
21 was most likely radioactive but labeled as cleared of radioactive contamination over the months
22 before it was discovered that the conveyor belt system had been improperly run.

24 Work Culture at Hunters Point

25 33. During the second half of my time at Hunters Point there was a noticeable negative
26 shift in culture which can be best described as fraudulently cutting corners wherever possible.
27 Production – that is, getting the work done as quickly as possible and with as little cost as

possible—was the sole concern at HPNS, and it came at the expense of proper radiological procedures. Fraud was committed on a daily basis. It even reached a point where field workers participating in fraudulent activities established a warning system on the radios to alert one another when Bert Bowers, the Radiological Safety Officer on site, was coming out in the field.

34. The fact that these improper procedures and fraudulent practices were occurring on a regular basis was not lost on me. However, on the occasions that I did raise concerns about the way work was being performed, the response was always the same: "That is what they (Tetra Tech management or the Navy) want – get it done and get it done fast". We were told that "if you don't like it you can go home." I regularly heard of other employees being laid off from HPNS, and knew that if I refused to follow the direction of supervisors, no matter how improper or unethical I believed that direction to be, I too would be let go. The generous pay and tax free per diem were strong incentives to keep my head down and go along with what management wanted, and I know many others felt the same.

35. I was ultimately laid off in September 2012. By the end of my employment at Hunters Point I could hardly stand the mental burden and stress due to the cheating that came with the job. I experienced high blood pressure for the first time in my life. My experience at HPNS and the anguish I felt for what occurred due to the frauds there has caused me to give up on the real estate industry and I have not worked in that business since.

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge.

Executed on June 3, 2017 in Young Harris, Georgia.

Anthony Smith

Anthony Smith
(6-3-17)