

Chromium Contamination and Cleanup – Talking Points

Comment Theme: Alternative forms of remediation must be included in the cleanup plan

Bioremediation is an effective methodology for remediation that is cost-effective and maintains our philosophy of having love and reverence for Mother Earth and all her gifts – Nung Ochuu Quiyo

Talking Points:

- LANL and N3B must not engage in remediation activities which are disruptive and which ultimately result in additional and/or greater harm to those of our communities and all other living beings
- Remediation activities must foster life, not destroy it – LANL and N3B must commit to adopting the safest alternatives
- Remediation must increase the health of the entire living system
- All alternative forms of remediation must be considered – LANL and N3B must consider bioremediation as an alternative to current Hexavalent Chromium remediation strategies and for site-wide cleanup
- If LANL and N3B are to spray chromium-polluted water on the land, that toxic water must be effectively cleaned to a standard that is protective of pregnant women, Indigenous communities, farming communities and fragile ecologies inclusive of non-human life
- Remediation efforts must cultivate potentials of positive restoration
- LANL and N3B must create a holistic and community-driven remediation design using bioremediation and holistic management

Comment Theme: Transparency

Talking Points:

- LANL and the NM Environment Department need to make information more easily accessible to the public, for example, there is no website link to the actual language of DP-1793
- There needs to be an immediate sharing of information – The public needs to know as soon as LANL and the NM Environment Department know
- LANL and the NM Environment Department need to provide full and complete information, not just bits and pieces of information

Comment Theme: Monitoring of Chromium 6

Talking Points:

- Monitoring of the health of the people living in communities surrounding LANL must begin immediately. This information must be used to establish baselines and inform protective measures
- NM Environment Department must set a chromium 6 drinking water standard, not just a total chromium standard
- LANL, N3B and the NM Environment Department must capture baseline data on the levels of Chromium 6 in the soil on the land prior to dispersing the cleaned chromium-impacted water
- Monitoring that tells the community the total weight of contaminants that is applied (not just the concentration at a given time) must be included
- An ecologist should be added to the monitoring team
- Funds must be allocated to enable members of affected communities to engage in monitoring of soil and water in their geographic areas
- More frequent testing must occur to measure contaminants in soil and in private wells
- Testing and monitoring must be done by an independent third party
- LANL and N3B must adhere strictly to soil and water monitoring programs
- Monitoring results must be shared with potentially affected people as soon as they are available

Comment Theme: Community Stakeholders must have a seat at the table

Talking Points:

- All affected Indigenous Communities and other affected people must be included when establishing cleanup programs, including soil and water monitoring
- LANL, N3B and the NM Environment Department must recognize and protect women, children, and our unborn, those most vulnerable from toxic contamination. They must end the use of "the reference man," a 150 lb. adult, white male, of western-European descent and custom, as the standard which determines allowable levels of contaminant exposure.
- The reference standard used by LANL, N3B and the NM Environment Department must recognize Indigenous, land-based, people of color, particularly women as women are twice as likely to get cancer from the same dose of toxins as a man
- NM Environment Department must innovate with regard to the public process and consider the use of "charrettes", which allow all participants to be mutual authors of all plans
- Guardians must be appointed for the following and must be included when establishing cleanup programs:
 - Youth
 - Future generations – Representing their right to a clean and healthy environment
 - Water

- Trees and Plants
- Wildlife
- Mother Earth

Comment Theme: Reversing the burden of proof

Talking Points:

- The burden of proof needs to shift: It should not be the responsibility of the public to prove that harm is being caused.
- LANL and N3B must be the entities to demonstrate that their proposed action is the safest and that it does not contribute to deadly cumulative impacts on all forms of life
- The mentality and the practices of LANL, N3B and the NM Environment Department need to shift to serve and protect people, the earth and nature and not the polluter and their corporate profits
- LANL, N3B and the NM Environment Department must take on the attitude and practice of the duty to protect and to do no harm
- LANL, N3B and the New Mexico Environment Department must take on the attitude and practice of the duty to do no harm