

From: (b) (6) Privacy, (b) (7)(C)
To: [ECRD Complaints](#)
Subject: Civil rights complaint
Date: Thursday, March 26, 2026 10:07:44 AM

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FORMAL CIVIL RIGHTS & SECTION 504 COMPLAINT – Environmental Discrimination (BWXT Jonesborough)

To: Title_VI_Complaints@epa.gov, OCRMail@hhs.gov, civilrights.justice.gov, TDEC.TitleVI@tn.gov, consumer.affairs@ag.tn.gov

Date: March 26, 2026

RE: Discriminatory Impact of BWXT High-Purity Depleted Uranium (HPDU) Rezoning

I am filing this formal administrative complaint under Title VI of the Civil Rights Act and Section 504 of the Rehabilitation Act. I am alleging that the Washington County Commission and the State of Tennessee are violating the civil rights of residents—specifically those with pre-existing medical vulnerabilities—by approving a high-impact nuclear facility in a residential/agricultural zone.

1. Disparate Impact on Medically Vulnerable Residents:

I am a resident with a compromised health status and a history of past environmental exposures. The decision to permit a facility that will emit 250+ lbs of radioactive dust annually creates a "hostile environment" for citizens with immune-deficiencies and chronic respiratory illnesses. Under the ADA and Section 504, the government is prohibited from taking actions that disparately harm individuals based on their health status.

2. Failure of "Reasonable Assurance" and Emergency Infrastructure:

The county's reliance on the Limestone Volunteer Fire Department is a direct threat to my life. This department lacks the specialized HAZMAT training and radiation monitoring equipment (Geiger counters) required for a uranium fire. Furthermore, there is no specialized medical facility in Jonesborough capable of treating radiation-linked "toxic soup" exposure for residents who are already ill.

3. Pattern of Non-Compliance (The "NFS Erwin" Precedent):

BWXT's sister facility, Nuclear Fuel Services (NFS) in Erwin, TN, has a documented history of "near-miss" criticality events (March 2006) and radioactive leaks into the Nolichucky River (2010, 2022). Approving an expansion in Jonesborough—which sits on a flood plain recently devastated by Hurricane Helene—without a full Environmental Impact Statement (EIS) ignores the known "Deficient Safety Culture" associated with this operator.

4. Seismic and Environmental Neglect:

The site sits in the East Tennessee Seismic Zone. A 2.6 magnitude earthquake recently hit nearby Greeneville, yet no modern seismic assessment was conducted. Additionally, there is no industrial sewer infrastructure; waste is being directed toward a flood plain that feeds Little Limestone Creek, where residents have already observed a significant decline in wildlife.

I request an immediate investigation into the discriminatory nature of this land-use decision and a stay on all construction permits until a "Health Equity Assessment" is completed for the affected residents.

Sincerely,

(b) (6) Privacy, (b) (7)(C)

From: [ECRD Complaints](#)
To: [ECRD Complaints](#)
Subject: FW: Introduction of Case Manager - Complaint Under Review
Date: Thursday, April 30, 2026 11:31:16 AM

From: (b) (6) Privacy, (b) (7)(C) Enf. Privacy
Sent: Wednesday, April 8, 2026 8:38 AM
To: Mason, Trinita <Mason.Trinita@epa.gov>
Subject: Re: Introduction of Case Manager - Complaint Under Review

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Good morning Trinita,

Alleged Discriminatory Acts by Entity

(EPA Civil Rights Submission)

1. Division of Radiological Health (TDEC)

Allegation: Potential Failure to Provide Meaningful Access and Effective Communication (Title VI & Section 504)

Based on available information:

- Lack of Accessible Notification
 - No evidence of direct or accessible notification to medically vulnerable or disabled residents regarding:
 - airborne uranium release limits
 - potential water contamination risks
- Inaccessible Technical Information

- Public materials appear to rely heavily on complex radiological terminology without plain-language or disability-accessible formats.
 - This may limit meaningful access for individuals with cognitive or sensory impairments.
 - Lack of Disparate-Impact Consideration
 - No publicly available analysis addressing whether uranium-related risks may disproportionately affect residents with disabilities or pre-existing medical conditions.
-

2. Tennessee Department of Health

Allegation: Potential Failure to Provide Public-Health Communication and Protection for Vulnerable Populations (Section 504)

Based on available information:

- Absence of Targeted Health Guidance
 - No identified public-health advisories addressing uranium-related risks for medically vulnerable or disabled residents.
 - Lack of Emergency-Planning Coordination
 - No evidence of coordination regarding:
 - notification systems for homebound residents
 - evacuation or shelter-in-place planning for individuals with mobility or cognitive impairments
 - Limited Public-Health Framing
 - Public information does not appear to consistently communicate potential health impacts in a manner accessible to vulnerable populations.
-

3. Washington County Planning Commission

Allegation: Denial of Access and Procedural Barriers to Participation (ADA &

Section 504)

Based on available information:

- Inadequate Public Notice
 - At least one meeting was announced with approximately 24 hours' notice.
 - This may disproportionately impact disabled residents who require additional time to arrange transportation or assistance.
- Inaccessible Meeting Conditions
 - Meetings were reportedly overcrowded and lacked accommodations for individuals with:
 - mobility limitations
 - sensory or cognitive impairments
- Unequal Treatment of Mobility Devices
 - A mobility aid (b) (6) Privacy, (b) (7)(C) Enf. Privacy was denied at entry, while another attendee using a (b)(6) Privacy, (b)(7)(C) was permitted.
 - This inconsistency may indicate unequal treatment and a failure to provide a reasonable modification under the ADA and Section 504.

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