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Craig Cooper, Nicole Moutoux, Mary Aycock & Gregg Dempsey

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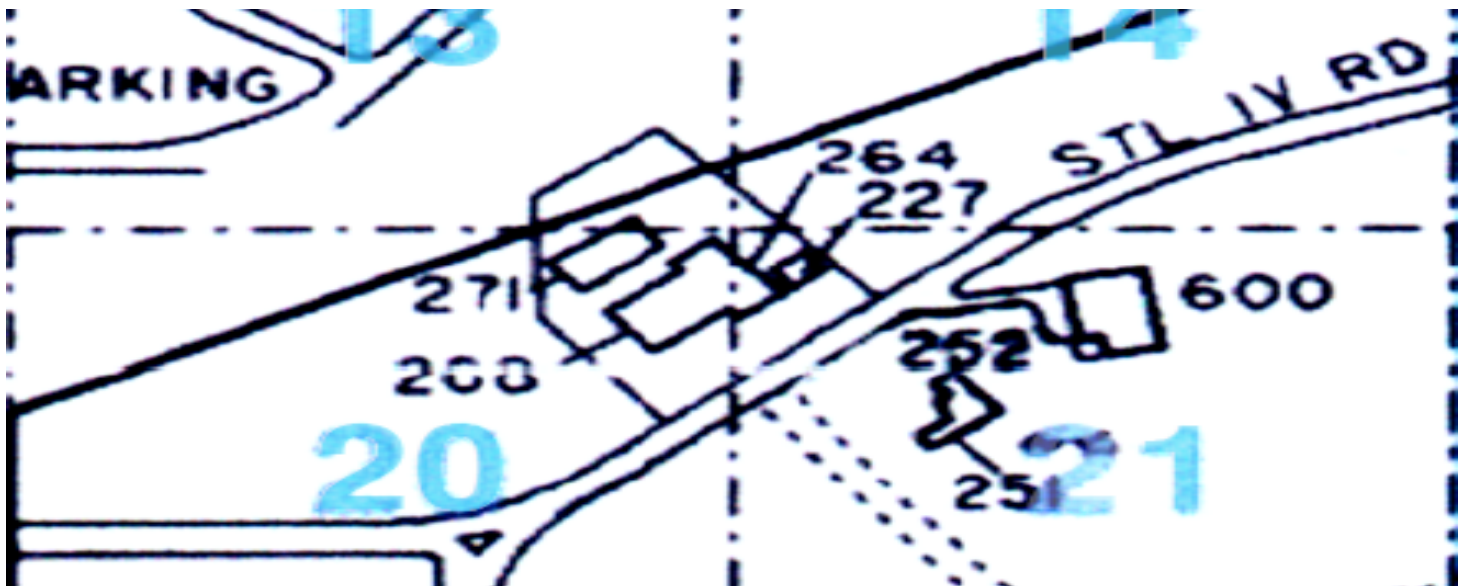
United States Environmental Protection Agency (EPA) Region IX (Via Electronic Mail)

ACME Comments - DRAFT Historical Site Assessment Sub-Area (HSA) 5-B October, 2010



Enclosed in this correspondence are comments on the Draft Technical Memo of Sub-Area HSA-5B (Historical Site Assessment) Santa Susana Field Laboratory (SSFL) Site AREA IV Radiological Study - Ventura County, California prepared for the United States Environmental Protection Agency (EPA) Contract Number EP-S7-05-05 prepared by HydroGeologic, Inc. (HGL).

Starting with the above photo, there looks to be some type of white cask/drum storage in the area known as the 17th street drainage, which could explain the radiological contamination discovered here. Can these be explained by asking the Department of Energy (DOE) or The Boeing Co.? Moving on to Figure 2.8 of the HSA-5B-8 Tech Memo (TM) that features the SSFL AREA IV/AREA III border above building 271 is incorrect and as the boundary line runs right through the said facility.



The above image is the more Correct Version of Mapping as taken from the 1984 Survey Map created by R.K. Boyles as seen in the link below...

http://www.rocketdynearchives.com/images/Rockwell_Map_of_the_SSFL_1984_Rocketdyne_archives_boeing_ssfl_santa_susana_field_lab_nuclear_laboratory.pdf

The Tritium groundwater plume could pose a potential problem for the soil as stated in several reports that have identified Tritium in the Soil in, and around AREA IV including offsite in the Runkle Canyon area. A commitment needs to be made in writing by DOE and EPA that Tritium (in Soil) will be on the list for Investigation and Remediation.

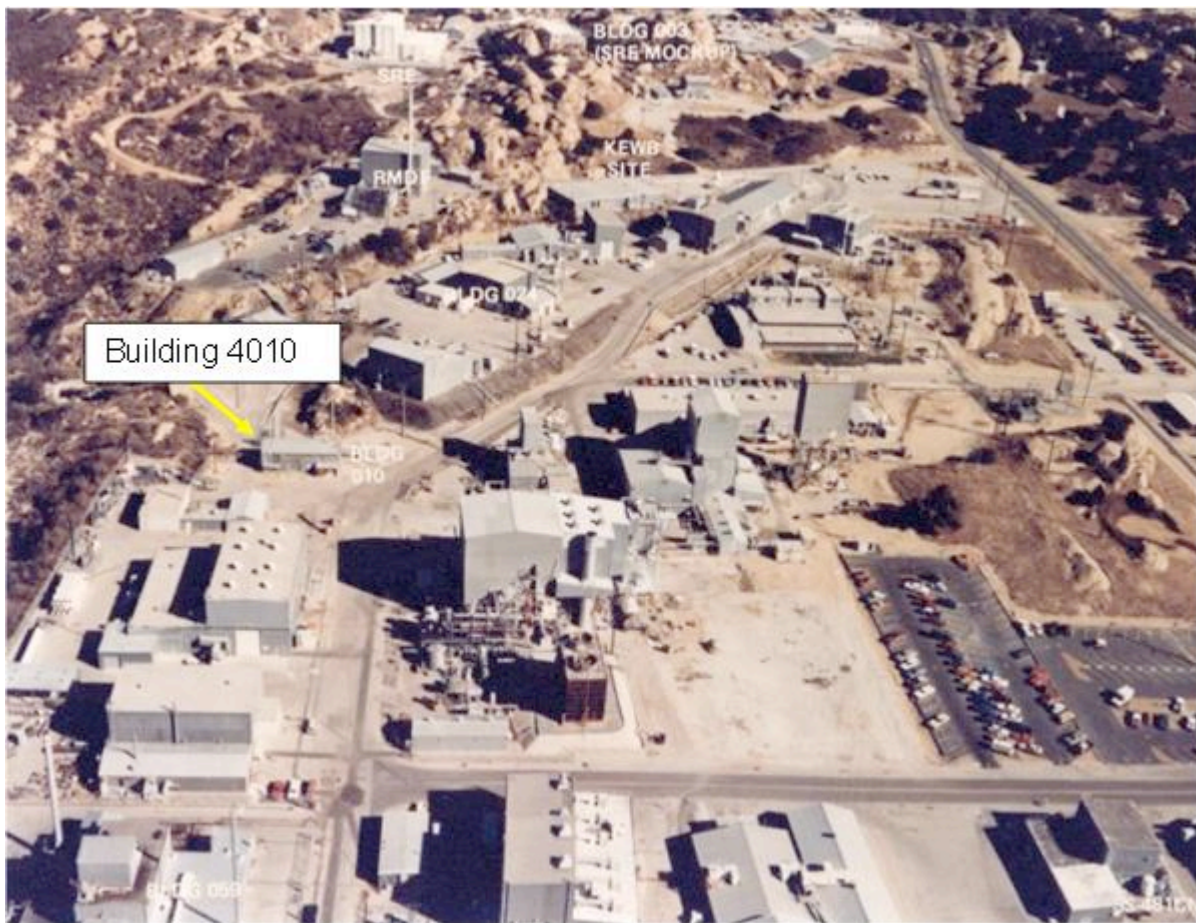
What Is the Likely Source of Tritium?

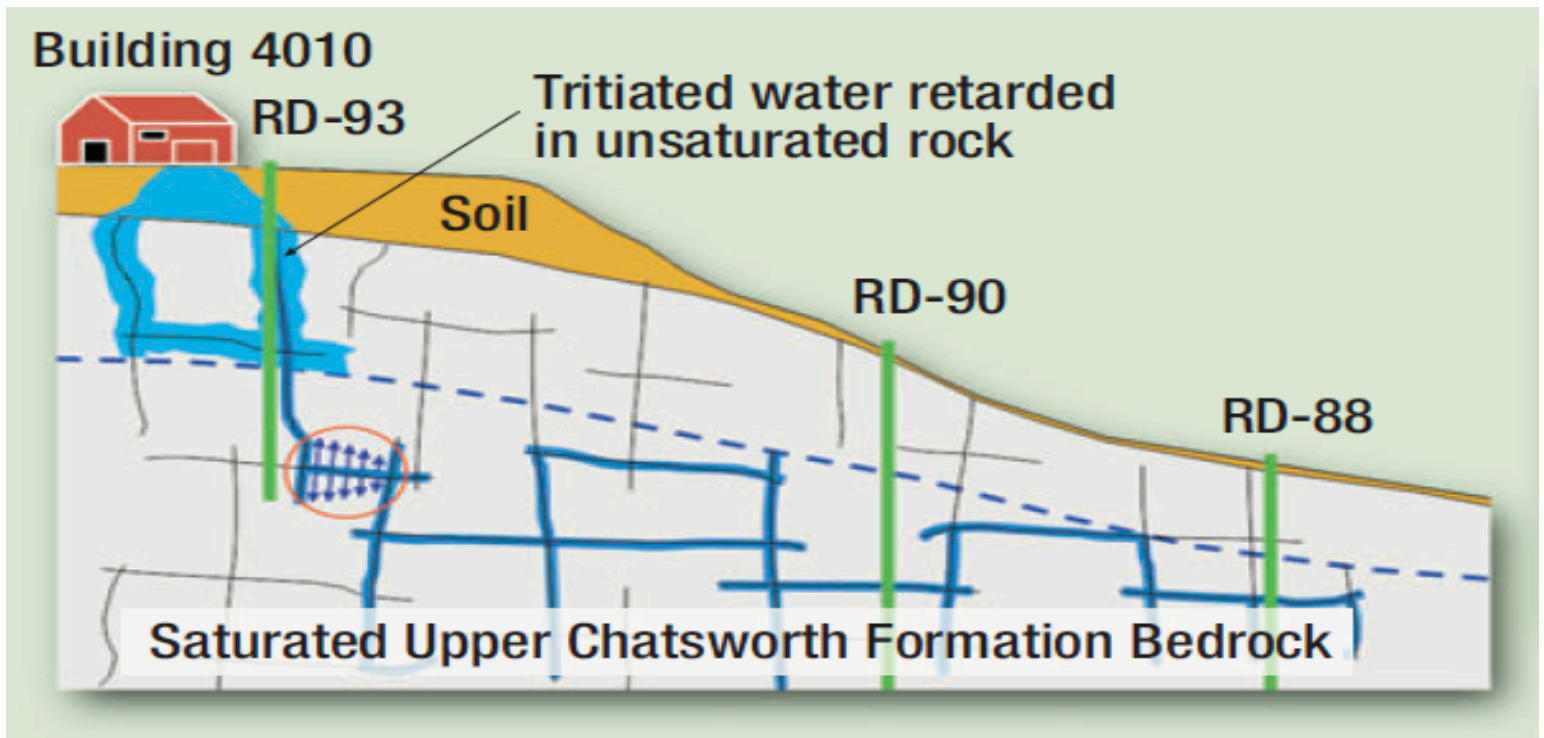
We believe Building 10 is the likely source of the tritium.



What Happened at Building 10?

- Constructed in 1959. Featured three subsurface vaults extending at least 14 feet below grade
- A prototype space nuclear reactor was tested in one of the vaults until 1960 and again from 1963 to 1965
- A nuclear reactor produces energetic particles called neutrons
- Tritium is a hydrogen atom with two extra neutrons
- Tritium was found in the concrete vault
- Found highest concentrations to date in the bedrock samples near building 10
- Building 10 was decontaminated and demolished in 1978





The above photo may help in some identification of pipes to and from Building 4011, this is the 2001 excavation of the Building 11 Leach Field.



The above photo from 1988 shows a few areas that are not facilities, yet might need extra investigation as a potential radiological or chemical Area of Concern (AOC). In the upper right we see the Central Parking area of the HAS - 5-B reporting area that has what appears to be roll off bins that are charred and could be used in waste destruction. Just to the left of this is Tank #735 which was used as Fuel Storage, not Water, this needs to be addressed. To the North of the Central Parking area, we see an Open Field with what appears to be a pond and debris storage. From several aerial photographs this area indicates that it was used for waste storage and/or destruction and the fact that there is/was no facility located here this should be listed as an AOC. There appears to be a storage area of blue 55 gallon drums under the 4010 Facility, and needs to be investigated. We see Building 13 in the bottom middle and to its left we see how Building 12 has been modified from its original design as seen in the black and white photograph on the following page. Have the responsible parties given EPA use to such photos as the above. We need to examine more of these and insert them in all portions of the HAS.



In Closing, I would like a higher resolution version of the Document Named HSA-5B_Figs_2-of-2.pdf, there are some details I am concerned with and cannot read the fine print.

Thank you in advance for the consideration of my comments.

William Preston Bowling - ACME
 P.O. Box 1636, Topanga Canyon, California 90290

AEI's extensive field laboratory is located in California's Santa Susana Mountains. (Illustration by Ernest Kopp.)

How can A.I. facilities help you plan a Nuclear Program?

In the picturesque Santa Susana mountains near Los Angeles, Atomic Energy International has built an extensive field laboratory for research, engineering and testing in the nuclear sciences. Here, men of extraordinary courage in the valley below, men who pioneered the creative use of atomic energy are applying their experiences to develop advanced nuclear reactors and associated equipment.

Fourteen years of experience in developing various types of reactors for the Atomic Energy Commission and other organizations have given the men of Atomic Energy International a confident background unparalleled in the industry. The facilities at their disposal are among the most well planned and complete in the world.

Results of A.I.'s work have been demonstrated in projects for the AEC which include the Organic Moderated Reactor Experiment on the National Reactor Testing Station in Idaho and the Bedouin Reactor Experiment at the company's field laboratory. Additionally, A.I. built and is operating SNAP II, a 220 pound prototype reactor to produce three kilograms of plutonium for space vehicles.

Atomic Energy International is also building large power reactors for electric utilities in Ohio and Nebraska under AEC contracts. Studies are underway for other power reactors in the United States and Europe. Research reactors have been built for A.I. in Denmark, Germany, Italy, Japan, Puerto Rico and several sites in the United States.

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