



Rick Brausch

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Department of Toxic Substances Control (DTSC)

P.O. Box 806, Sacramento, California 95812-0806 (Via U.S. Mail and E-mail)

cc: Billie Greer for The Honorable Governor Arnold Schwarzenegger, Cal EPA Secretary Linda Adams, Maziar Movassaghi & Susan Callery - DTSC, Craig Cooper - EPA, Assemblyman Cameron Smyth, Assemblyman Sam Blakeslee, Assemblyman Bob Blumenfield, Assemblyman Michael Feuer, Assemblyman Jared Huffman, Assemblywoman Julia Brownley, Aron Miller for Senator Fran Pavley, Former Senator Sheila James Kuehl, Christina Walsh - CleanupRocketdyne.org, Phyllis Winger for Los Angeles County Supervisor Greig Smith, Shelly Backlar - Friends of the Los Angeles River, Thomas Gallacher - Boeing, Allen Elliott - NASA, Stephie Jennings - DOE, Millie Jones for Los Angeles County Supervisor Michael Antonovich and Ventura County Board of Supervisors Linda Parks and Peter Foy.

ACME (Aerospace Cancer Museum of Education) has provided the below comments on both Draft Consent Orders regarding the cleanup of the Santa Susana Field Laboratory (SSFL). References can be found here... <http://www.acmela.org/consentorder101.html>

The below link is correspondence from the Department of Energy (DOE) to the Department of Toxic Substances Control (DTSC) on August 11<sup>th</sup> of 2009. It makes reference to an August 6<sup>th</sup>, 2009 letter from DTSC to DOE talking about the "New Approach" and an unknown community member who will be taking part in the negotiations of the then, Three-party consent order that from subsequent letters "Thus, as far as DOE is concerned, the prior negotiations have reached a successful outcome, We frankly do not understand why DOE is being asked to engage in yet another round of negotiations. DOE has been concerned about converting negotiations into a process with additional participants who are not Respondents".

[http://www.acmela.org/images/8-11-09\\_letter\\_from\\_DOE\\_to\\_DTSC.pdf](http://www.acmela.org/images/8-11-09_letter_from_DOE_to_DTSC.pdf)

The above letter was released before the Draft Consent Order comment period was announced and after several requests, ACME has yet to see the August 6<sup>th</sup>, 2009 letter from DTSC to DOE talking about the "New Approach". Is there a DTSC designated Community Representative for matters related to the SSFL?

One week later...DTSC released a Public Notice and Comment Period for a Draft Consent Order between the National Aeronautics and Space Administration (NASA) and DOE, yet The Boeing Co. is excluded.

[http://www.acmela.org/images/DTSC\\_August\\_19th\\_Public\\_Notice\\_Draft\\_Consent\\_Order.pdf](http://www.acmela.org/images/DTSC_August_19th_Public_Notice_Draft_Consent_Order.pdf)

Immediately following the Public Notice, Maziar Movassaghi the Acting Director of DTSC issues a Press Release seen in the link below.

[http://www.acmela.org/images/SSFL\\_Update\\_from\\_Maziar\\_DTSC\\_August\\_19\\_of\\_2009.pdf](http://www.acmela.org/images/SSFL_Update_from_Maziar_DTSC_August_19_of_2009.pdf)

For DTSC to release the Draft Consent Order without all three Responsible Parties (RP) is a disservice to the surrounding communities that have been struggling with health issues for decades. Alarming high rates of Cancers in Children, Autism is on the rise, Elevated Miscarriage Risks, Neurological Disorders to name a few. There is a misconception that DTSC has presented to the public and should be known, DOE and their role in any consent order will only apply to 90 of the 289.9 acres in AREA IV, this should be noted in very large print. When the public reads this Draft Consent Order, some may have a sigh of relief, "At least the Nuclear Area is in the Draft", not so, but it could be misconstrued. How can the Draft Consent Order be applicable or even enforceable when The Boeing Co. owns apx. 84% of the 2850 Acres? This includes areas that have been receiving public attention over the past 3 decades...(A Few examples of Dozens) the Pond Dredge area, where a missing Uranium Slug has yet to be found, Building 4020 (Hot Lab Facility) and the SRE (Sodium Reactor Experiment) Complex, home to the largest and longest running Nuclear Meltdown in the United States. The Silvernale Pond in AREA III owned by Boeing took runoff from the SRE Pond and then drains into the NASA AREA II R2 Pond that is the headwaters to the L.A. River.

None of the representatives of any of the parties, NASA, DTSC, BOEING or DOE has the authority to bind a party to any agreement without formal approval. Why was this pushed out the door when we are far from this point? It is of utmost importance that DTSC state their position on these issues specifically. If previous versions included all three respondents (including Boeing) then why does the version released to the public NOT include Boeing? Rick Brausch said publicly that it was the decision of DTSC to remove The Boeing Co. prior to release of the Draft Consent Order.

The same day DTSC released the documents on page two, to the public, Assemblywoman Julia Brownley issues a Press Release praising Call EPA Secretary Linda Adams. This makes one think that it was Secretary Adams who pushed for the release of the Draft Consent Order without ALL THREE RESPONSIBLE PARTIES.

[http://www.acmela.org/images/Julia\\_Brownley\\_August\\_19\\_of\\_2009\\_SECRETARY\\_ADA\\_MS\\_ACME\\_Aerospace\\_Cancer\\_Museum\\_of\\_Education.pdf](http://www.acmela.org/images/Julia_Brownley_August_19_of_2009_SECRETARY_ADA_MS_ACME_Aerospace_Cancer_Museum_of_Education.pdf) .pdf

Confusion from NASA and DOE on why they released the Draft Consent Order without notification, and the Draft Consent Order was not the one they were currently under negotiations in is made very clear. The below document again states there will be another party aside from the Respondents (NASA, Boeing, DOE) in negotiations. This needs to be addressed and understood by the public.

[http://www.acmela.org/images/NASA\\_to\\_DTSC\\_8-21-09.pdf](http://www.acmela.org/images/NASA_to_DTSC_8-21-09.pdf)

Then NASA presents to the public the below Press Release...

[http://www.acmela.org/images/NASA\\_Press\\_Release\\_August\\_21\\_of\\_2009.pdf](http://www.acmela.org/images/NASA_Press_Release_August_21_of_2009.pdf)

Then we have the below letter from The Boeing Co. "Surprised" they were left out. They were pushed out of negotiations without even a courtesy call. The Boeing Co. in several public appearances since the release of the Draft Consent Order has said they would have wanted to see negotiations continue and to be on the order. The Boeing Co. did not participate because they were Shut Out by DTSC. Do we want the main landowner pushed out of a document when they claim only one issue of "Tolling Language" sets them apart from NASA and DOE?

[http://www.acmela.org/images/Boeing\\_letter\\_to\\_Community\\_August\\_27\\_of\\_2009.pdf](http://www.acmela.org/images/Boeing_letter_to_Community_August_27_of_2009.pdf)

DOE in a letter below showing their frustrations about why this came about and the quote regarding the professionalism of Former SSFL DTSC Project Director - Norm Riley, "We found Norm Riley to be a Tough while highly Capable and thoroughly professional advocate for the State. His willingness to listen to (if not always agree with) our concerns went a long way toward achieving the progress we've made so far".

[http://www.acmela.org/images/8-27-2009\\_letter\\_from\\_DOE\\_to\\_DTSC.pdf](http://www.acmela.org/images/8-27-2009_letter_from_DOE_to_DTSC.pdf)

With all of this coming about when the Statute of Limitations of Senate Bill 990 (SB 990) could be reached in mid October, ACME felt the below letter to Governor Schwarzenegger was warranted.

[http://www.acmela.org/images/ACME\\_Group\\_Letter\\_to\\_Governor\\_Schwarzenegger\\_SB\\_990\\_Norm\\_and\\_Consent\\_Order\\_Sept\\_1\\_of\\_2009.pdf](http://www.acmela.org/images/ACME_Group_Letter_to_Governor_Schwarzenegger_SB_990_Norm_and_Consent_Order_Sept_1_of_2009.pdf)

In a time when everything has the potential to fall apart, especially SB 990, government officials needed to be called upon for answers. The below joint letter from DOE and NASA to DTSC addresses a few of our concerns as well as several other individuals, organizations and impacted community members. NASA and DOE write "As you are aware, DTSC, DOE, NASA and Boeing have been engaged in good faith negotiations for the past eight months. These collective efforts took us through many drafts; and your proposed release draft 2.0 (which might more aptly be styled version 2.1) is at least the 10th substantive revision of the original draft sent to us by DTSC in December 2008. We firmly believe version 2.0, which Respondents sent to DTSC on August 13, 2009, reflects the latest agreements between representatives of DOE, NASA and DTSC on all provisions of the ACO, including significant compromises by all parties".

[http://www.acmela.org/images/DOE-NASA\\_to\\_DTSC\\_09-08-09-1.pdf](http://www.acmela.org/images/DOE-NASA_to_DTSC_09-08-09-1.pdf)

After ACME and several other organizations had requested the version 2.0 that was in talk with all three parties and Norm Riley, the public was given a second Draft Consent Order to comment on (See Below Link). When DTSC was asked "Which one do we comment on and which one will ultimately be considered?" Rick Brausch of DTSC said, "Both".

[http://www.acmela.org/images/Public\\_Notice\\_Version\\_2-2.0.pdf](http://www.acmela.org/images/Public_Notice_Version_2-2.0.pdf)

They called this version 2.0, but it was not the version we were requesting. It was a version of the first 2-party Draft Consent Order that even took us further backward into negotiations. So now, the public has another Draft Consent Order that slightly differs from the first one, yet the public still does not know how this is different from the one negotiated with All Three Parties, Boeing, NASA & DOE.

Government officials responded after they were called upon for answers by ACME and other concerned community members with House Speaker Karen Bass assigning Assemblywoman Julia Brownley to head a Committee to investigate, not even her district.

It is the district of Assemblyman Cameron Smyth. It could be possible that her co-authoring SB 990 made her the key point person to lead this committee.

[http://www.acmela.org/images/Brownley\\_to\\_SSFL\\_Committee\\_Sept\\_9\\_of\\_2009.pdf](http://www.acmela.org/images/Brownley_to_SSFL_Committee_Sept_9_of_2009.pdf)

The below e-mail was shared to us by Mary Wiesbrock of Save Open Space (SOS). Mary had asked Maziar Movassaghi of DTSC to produce the real 2.0 so we can comment accurately and with merit. His response of...."I am not sure what is being referred to as the "real" order in your email. DTSC has negotiated a draft cleanup order with DOE and NASA only. Both versions 1.9 and 2.0 are related to said parties only. Unfortunately we are not yet at a public review stage with Boeing as to their clean-up responsibilities. We're hopeful that the Boeing discussions will be similarly successful in the near future". Was shared with recently dismissed SSFL Project Manager - Norm Riley, he followed up with a retort to Maziar Movassaghi.

[http://www.acmela.org/images/Norm\\_Riley\\_to\\_Maziar\\_on\\_The\\_Real\\_Consent\\_Order\\_Sept\\_10\\_of\\_2009.pdf](http://www.acmela.org/images/Norm_Riley_to_Maziar_on_The_Real_Consent_Order_Sept_10_of_2009.pdf)

From our September 10<sup>th</sup> meeting and then our evening event to the last two public forums held on September 29<sup>th</sup>, 2009...ACME has asked several times in writing and in public forum that DTSC provide, In Writing, the answer to the following question..."If DOE and NASA sign and agree to this Draft Consent Order that The Boeing Co. is not part of, will Boeing be bound by the 2007 Consent Order (negotiated and written by former DTSC SSFL Project Manager - Norm Riley) signed by all three parties, or by NASA and DOE signing the recent version(s) of the Draft Consent Order will the 2007 Consent Order become null and void?" This is a huge question that the public needs an answer to before any comments can be written. This is one of dozen concerns that the Draft Consent Order does not address at all.

[http://www.acmela.org/images/ACME\\_CleanupRocketdyne\\_Consent\\_Order\\_101\\_Questions\\_to\\_DTSC.pdf](http://www.acmela.org/images/ACME_CleanupRocketdyne_Consent_Order_101_Questions_to_DTSC.pdf)

The below link is to the DTSC September 17<sup>th</sup>, meeting that was held for the Community to understand both versions of the Draft Consent Order.

[http://www.acmela.org/images/DTSC\\_Agenda\\_for\\_Sept\\_17\\_of\\_2009\\_Draft\\_Consent\\_Order\\_Meeting.pdf](http://www.acmela.org/images/DTSC_Agenda_for_Sept_17_of_2009_Draft_Consent_Order_Meeting.pdf)

From what DTSC told the public at their September 17<sup>th</sup>, 2009 meeting in their Chatsworth offices, the comments will come in, and after a month they will be fully reviewed and this will put us back on track by the end of the year. This is a major concern as the cleanup is running on a strictly coordinated deadline. 2017 maybe out of our reach now. Other deadlines could possibly be damaged from the decision to release these incomplete documents. President Barack Obama gave the DOE Economic Stimulus Money to hire Region IX EPA to do a Radiological Background Study and site Characterization of AREA IV and the Northern Buffer Zones of the SSFL. This money will be returned to help other DOE sites if it is not used by certain deadlines, ACME does not want to see the negotiations of these Fake Draft Consent Orders to delay or take away funds from this long awaited cleanup. The surrounding communities are stricken with hundreds of health issues that could be a potential impact from the past operations of the SSFL. The longer DTSC puts work-hours into an incomplete document, the longer we will worry if our homes and offices are safe.

(Click on Below Link) There was a date set for the Assembly Select Committee Hearing and the public requested a time allotted for General Public Comment at the mic so the Assembly Committee could really understand the concerns of Health Impacts and Delays.

[http://www.acmela.org/images/Brownley\\_Press\\_Release\\_Assembly\\_Hearing\\_SSFL\\_Sept\\_17\\_of\\_2009.pdf](http://www.acmela.org/images/Brownley_Press_Release_Assembly_Hearing_SSFL_Sept_17_of_2009.pdf)

Then on Saturday, an Addendum to the Press Release was issued asking the public to RSVP for the Assembly Select Committee Hearing. This may have been viewed as a pre-screening of individuals who were to attend.

[http://www.acmela.org/images/Brownley\\_Press\\_Release\\_ADDENDUM\\_Assembly\\_Hearing\\_SSFL\\_Saturday\\_Sept\\_19\\_of\\_2009.pdf](http://www.acmela.org/images/Brownley_Press_Release_ADDENDUM_Assembly_Hearing_SSFL_Saturday_Sept_19_of_2009.pdf)

Then on Tuesday, September 22<sup>nd</sup>, 2009 Assemblywoman Julia Brownley's office sent out an e-mail to a dozen community members with no Press Release saying that the Assembly Select Committee Hearing was cancelled. The next day after 5pm we see the below Press Release from Senator Fran Pavley.

[http://www.acmela.org/images/SSFL\\_Select\\_Committee\\_Cancelled\\_from\\_Pavley\\_Sept\\_23\\_of\\_2009.pdf](http://www.acmela.org/images/SSFL_Select_Committee_Cancelled_from_Pavley_Sept_23_of_2009.pdf)

Julia Brownley's office said DTSC cancelled because..."Basically, DTSC felt constrained as to how much they could say publicly about their concerns with the current draft order while the public comment period is still open. Closes on October 2. They also wanted the public comments to come without being influenced by anything they, DTSC, might say at the hearing". This Assembly Select Committee Hearing was to investigate what went on before the comment period deadline so the Public could be better armed with information to comment with. DTSC is hurting the trust that was built up with the surrounding communities, even with the Responsible Parties over the tenure of Norm Riley. Nobody will benefit from adding another one, two or even ten years to this long awaited cleanup. What concerns could DTSC possibly have, and why this sudden feeling of constraint two days before the event?

Then Brownley adds "The first hearing will be scheduled some time next month on the subject of: "Preview of Draft Consent Order Being Negotiated with Responsible Parties: Do Terms Proposed Support or Undercut Senate Bill 990." Date and time still to be determined. I see the principal charge of this Committee as providing direct legislative oversight to ensure that the final Consent Order is fully compliant with the strict cleanup standards set forth in Senate Bill 990." on her September 2009 Newsletter released on September 29<sup>th</sup>, 2009 (See Link Below)

[http://acmela.org/images/Brownley\\_Sept\\_Newsletter\\_released\\_on\\_Sept\\_29\\_of\\_2009\\_at\\_459pm.pdf](http://acmela.org/images/Brownley_Sept_Newsletter_released_on_Sept_29_of_2009_at_459pm.pdf)

The order is not undercutting SB 990 nor does the order let them use less stringent health codes. The Draft Consent Order refers to standard boiler-plate codes but page after page refers to the appropriate health and safety code section that is the codified version of SB990, which mandates cleanup to the highest level, OR background - in the case where the PRG (Public Remediation Goal) is lower than background. Currently Background is currently in the process of being determined through the Background Study being conducted by USEPA for Radiation, and by DTSC for the chemical background levels (for chemicals not found in nature) and non detect for the others - **THE MOST IMPORTANT FACT IS** the Draft Consent Order does not include all the parties. **WE NEED THIS!!!** Boeing has been dropped from the order. That is NOT to say that they walked away, in fact, DTSC released the Draft Consent Order that was NOT the most recently negotiated document. They did so without telling the responsible parties (Boeing, DOE and NASA - This is what the public understood from the above letters) until after the fact, thereby eroding the trust that had been established.

In section 1.33, the DTSC proposed language says unequivocally that DOE will comply with the elements of the order, and their counter language in the version of 2.0 that was released to the public (that had been altered by DTSC omitting language that the RPs had agreed to) says only that they will "provide information..." instead of "comply with the order." We are going BACKWARDS!!!

DTSC owes the public to get all three parties on the Draft Consent Order, give The Boeing Co. their Tolling Language to be consistent with the other RP's. The reservation of rights is something that the federal entities have through their AEA authority (Atomic Energy Act), whereas Boeing does not have that, and therefore wants that. The tolling issue is in part because no one (including the responsible parties) really know when the statute of limitations occurs (date law was signed, codified, enacted, etc) so they want to "toll that right" until after remedy selection (what to do about the contamination is decided) That will be in approx. 2012 because we will need the background study completed first and that will take until 2011. Part of the issue with SB990 is that some radionuclides cannot be detected in the field at the level that is required for clean-up based on the PRG, so if you can't see it, how do you clean-up to it? That is a real issue, that is true on the basis of scientific possibility. That is important to consider. If we don't, we wind up in court instead of spending the current funding in the characterization & clean-up of soil.

We want to know why these risks are being taken with our future at such an important time in the negotiation process. We want a real order that is actually agreed to by all the parties, especially when DTSC has minimized Boeings role (See Link Below) in the contamination (stating they only are responsible for 10% of the rad contamination) when they in fact own ALL of area IV land, and 84% of the entire site, as well as the front gate, and access to the site, as well as the data inherited from Atomics International.

[http://acmela.org/images/SSFL\\_Update\\_from\\_Maziar\\_DTSC\\_August\\_19\\_of\\_2009.pdf](http://acmela.org/images/SSFL_Update_from_Maziar_DTSC_August_19_of_2009.pdf)

Several community members have requested that the actual Draft 2.0 Consent Order be released to the public for review, and instead, another false document was prepared and released for the public to review and comment on, and more conflicting inaccurate information has been provided to us. No clear direction was given to the public as to what the purpose of the comment process was to accomplish. In fact, Mr. Brausch gave indication to many of us that DTSC was not behind the document that was released and that was why it was so important to release it. Isn't that the job of the agency to first collectively and collaboratively create the best and most recently agreed draft document so the public can deal with the conceptual issues within the language?

Letters have been sent by all RPs to DTSC, all indicating that the draft released to the public was NOT the product of the 8 months of good-faith negotiations and therefore the trust issue between the RPs and the State of California has also been severely damaged and the public is caught in the middle. Instead, we were left to pour through over a hundred pages of legal language with no indication whatsoever as to the problems or concerns that DTSC had with the document so that we could understand the issues that are in debate.

Instead of living with these mistakes, a fractured order, a fractured negotiation process where trust has been damaged amongst the responsible parties as well as the public, where nobody trusts DTSC, let us be willing to fix our mistakes. These decisions can be changed. Bring back Norm Riley and let's get back to the business at hand: The clean-up to SB990 standards.

Please remember that we (the public) put all our faith in the existing consent order and the fact that the State of California had signed SB990 into law. We put our trust in you, over and ABOVE the federal Superfund Program because we trusted this more, we trusted the leadership we had in place that got us the Consent Order in the first place, and the law that you had signed mandating the most protective clean-up.

Ownership issues KEY, Boeing controls the entire site. Boeing runs the security at the front gate, and decides who goes in and out and when. When NASA enters the site, they need permission from Boeing.

“DOE’s legal position”

“It is DOE’s legal position that California does not have regulatory authority over DOE with respect to radioactive material. DOE and DTSC agree that the cleanup of the SSFL needs to move forward and with to cooperate to achieve this end. DOE believes that its legal position is not an obstacle to achieving a cooperative and timely cleanup of the site, including the radioactive materials, in a manner consistent with SB990 due to factors unique to the site including the fact that DOE is not the landowner.”

2.4.2 describes “Bigger than Bill” which later became the ISEO as ordered by Norm Riley, a cleanup of Sage Ranch grew to be 11,000 cubic yards of contaminated soils and debris removed from the creek, which had been running down to the children’s camp below, for decades. In this order, they claim it was not site related.

Respondent Boeing....Respondent Boeing discovered 1163 rocket motor igniters, lab glassware, and other debris beneath the surface.

Some of the rocket motor igniters resulted from SSFL research activities or operations. But they are not a respondent, so this requires explanation, because this demonstrates behaviors at the site, by all parties. 3.2.3 and 3.2.3.1, and 3.2.3.2 HSA references to investigate potential impacts to Areas 1 and 2, and but not Area 3 despite the evidence. Owned and operated by Boeing SRAM Version 2 How can this be sufficient to comply with SB990 when it doesn't include RADS? We need to step-out and delineate all contamination as understood under the current RFI reports released, going to non-detect so we can finally have an understanding of what SB990 compliance actually means. No more guesses and random numbers thrown out for people to worry about.

3.4.13 Groundwater Using the theory of degrading material is not adequate when considering TCE plumes in the groundwater Groundwater is a resource that must be protected. Land-use Covenant deed restrictions are not adequate. Section 3.9 "shall not constitute a remedy or sole justification for a remedy"

Land Use Covenant...It seems reasonable in conjunction with the anticipated covenant because we know the half-life of tritium is 12 years and therefore can estimate that the tritium contamination will reach acceptable levels in about three decades. However, the TCE plume will not similarly degrade and so the recordation of a land use covenant restricting GW use cannot be cited as the sole reason for taking no action to remove or otherwise treat the TCE plume.

We have now been given two "altered" documents to comment on, neither of which were the actual documents negotiated by the parties. We require answers to the hasty decision on the part of the State to alter these documents and remove the primary party.

***Signed under penalty of perjury...*** If Maziar is the signor, but is not actively involved, how does this signature issues really bind the agreement as it did when we had the decision-makers signing the documents for verification of completion and accuracy and adequacy? The people responsible for the information and work, need to sign for verification and submission, otherwise enforcement could potentially be impossible.

The Surrounding Communities have been shown this "New Approach" that the DTSC publicly voiced is responsible for. This will be a lesson on how things are Not, to be done in the future of this long awaited cleanup.

This process would put off any newcomer to this issue as far as public involvement is concerned. The manner in the release of both Draft Consent Orders has recent public trust

of CAL EPA, DTSC and many of the legislators headed for disaster. The DTSC's job is to protect Human Health and the Environment, not to risk it by mismanagement. The community was told that Cal EPA Secretary Linda Adams and DTSC Acting Director Maziar Movassaghi will now take a personal approach and be more involved in the cleanup of the SSFL. Since that statement in late August, neither Linda, or Maziar have been available to address our concerns. The only thing we received from Linda Adams is a September 9, 2009 letter informing us that we were not accepted for the 2009 Governor's Environmental Leadership Awards Program.

[http://www.acmela.org/images/Linda\\_Adams\\_to\\_ACME\\_Sept\\_9\\_of\\_2009.pdf](http://www.acmela.org/images/Linda_Adams_to_ACME_Sept_9_of_2009.pdf)

The public was told in the public meetings that DTSC Staff Attorney, Nancy Long was on a three-week vacation during the release of both Draft Consent Orders. Is the public to understand that there was no legal counsel advising Maziar Movassaghi or Rick Brausch on both Draft Consent Orders before release?

The Community should look to DTSC's expertise Nancy Long, and CalEPA's legal expertise Steve Koyasako to comment on these documents as well, showing us their concerns with the language provisions in both of these documents, as we are not able to see the companion document for Boeing. The Community needs comments from the knowledgeable project team members like, Laura Rainey, Gerard Abrams, Jim Pappas and Tom Seckington. With their with longtime knowledge of prior issues it would be helpful for the community to understand their concerns related to both Draft Consent Order(s).

In closing let it be known that, all three parties need to be on the Draft Consent Order - Boeing, NASA and DOE. Senate Bill 990 is LAW and the current consent order signed by all three parties, drafted and negotiated by former DTSC SSFL Project Manager - Norm Riley, says the Responsible Parties must adhere to all Applicable Laws. DOE states in the Consent Order proposed, that they do not have a problem with moving forward "in a way consistent with SB990 due to issues unique to the site, including the fact that DOE is not a landowner." If DOE is out because they are not a landowner, and NASA wasn't involved in Nuclear Operations, and Boeing isn't on the order...who is left holding the bag? THE COMMUNITY and Their Health.

Sincerely Concerned,

William Preston Bowling

Co-Founder/Director - ACME (Aerospace Cancer Museum of Education)

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