

The Nuclear & Chemical Cleanup of  
Santa Susana Field Laboratory

ACMELA.ORG



AEROSPACE CANCER MUSEUM OF EDUCATION

cleanuprocketdyne.org

Doug Sheeks

8/31/2009

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(Via U.S. Mail and E-mail)

cc. Tom Gallecher - The Boeing Co., Secretary Linda Adams - Cal. EPA, Maziar Movassaghi - DTSC, Rick Brausch - DTSC, Christina Walsh Cleanuprocketdyne dot org, Shelly Backlar - Friends of the Los Angeles River, Jim Donovan - National Park Service, Ventura County Supervisor Linda Parks, Phyllis Winger for Los Angeles City Council District 12 Councilmember Greig Smith, Louise Rishoff - Assemblymember Julia Brownley, Aron Miller for State Senator Fran Pavley and Millie Jones for Los Angeles County Supervisor Michael D. Antonovich.

Enclosed please find my comments on the Group 10 Resource Conservation Recovery Act Facility Investigation Report (Group 10 RFI Report) representing results of contamination and debris in the Southern Buffer Zone (SBZ) of the Santa Susana Field Laboratory (SSFL).

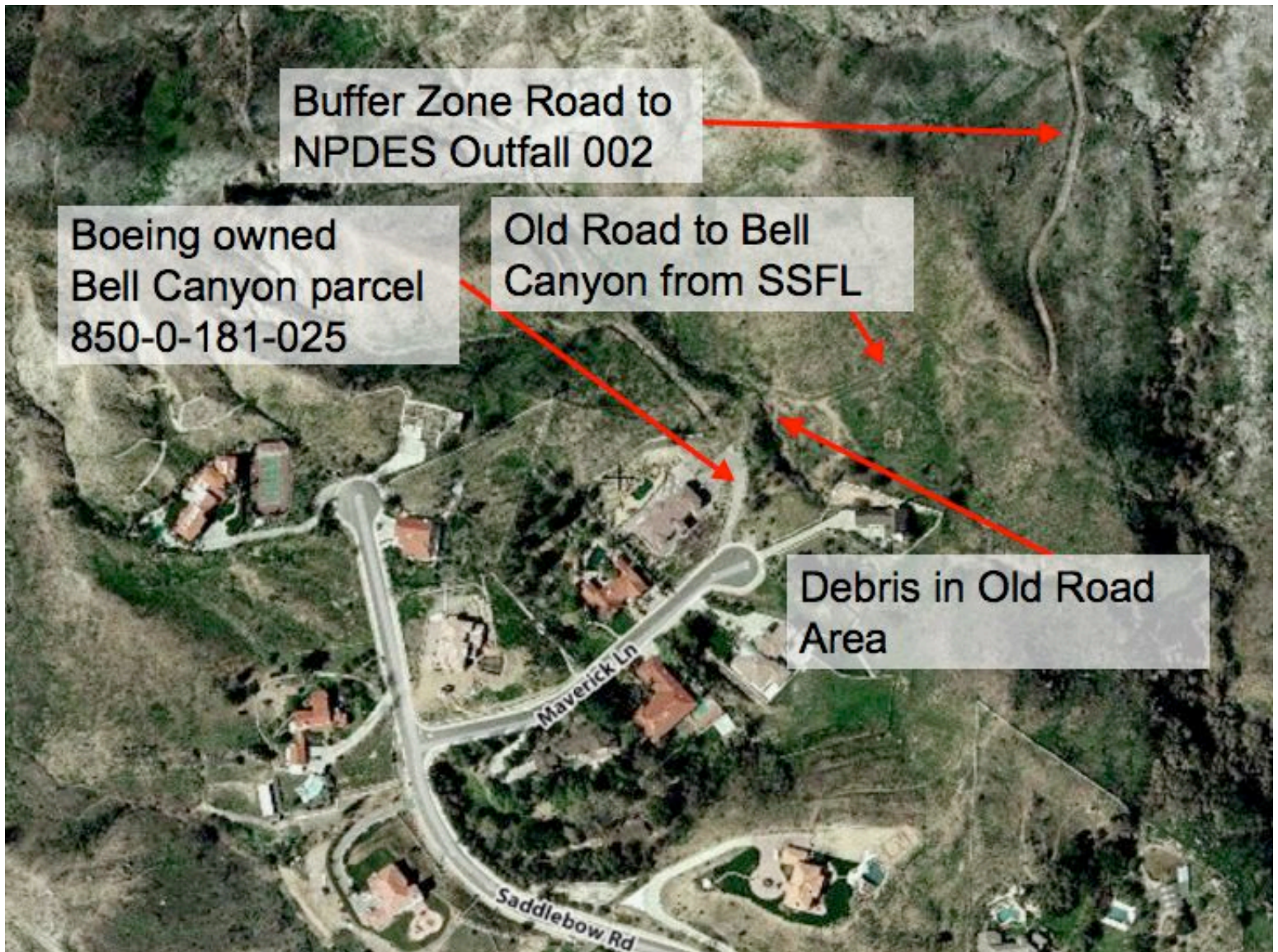


The SSFL Operational Areas are at a higher elevation than the Southern buffer zone and surrounding landowners potentially easing the migration pathway of contamination. The SBZ is a known dumping ground as seen by the Group 10 RFI reports, yet the extent of the debris extends further outward and throughout the 790 acres of Group 10 than indicated by its author CH2MHill. As seen in the illustration above the "Previous VOC (Volatile Organic Compound) Detection Area" near detection well RD-05c is on the Burro Flats Fault that has the potential to transport these VOC's further downward into the Southern Buffer Zone and eventually into the Chatsworth Reservoir & L.A. River.



The Southern Buffer Zone is one of the most important areas to characterize and remediate as it is the direct connection to the community of Bell Canyon and beyond as 1726 of the 2850 SSFL acres drain into the Bell creek Watershed. This is the headwaters to the L.A. River and the impacts from the SSFL have the potential to reach 52 miles into the harbor of Long Beach via the L.A. River. How can 19 areas of Group 10 be recommended for No Further Action (NFA) when there are results pending from other investigations that may help in the RFI process? One example are the Seeps & Springs Data that is still pending. Another issue that comes up is the Bell Creek Greenway Project with the National Park Service (NPS) in conjunction with the West Hills Neighborhood Council (WHNC). How can they be protected or informed on what the impacts to their field-work will have if source removal turns into No Further Action?

The Boeing Co. who co-own the SSFL with the National Aeronautics and Space Administration (NASA) have acquired access parcels through Bell Canyon Estates.



The below documents show the ownership on Title of the Bell Canyon Lots on Hacienda Road and Maverick Lane by Boeing North American Inc. Underlying documents and plotted easements should be obtained through public records to see the limits of access to determine a route of potential impact.

Bill Bowling Logged In - Sun - August 30, 2009 [ Log Out ]

# California Title Company

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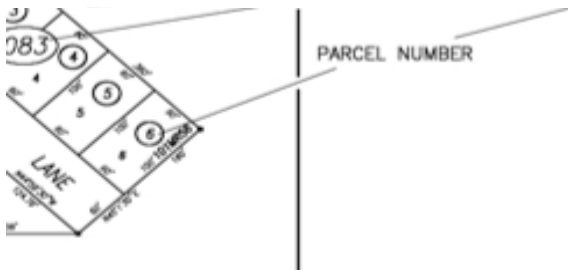
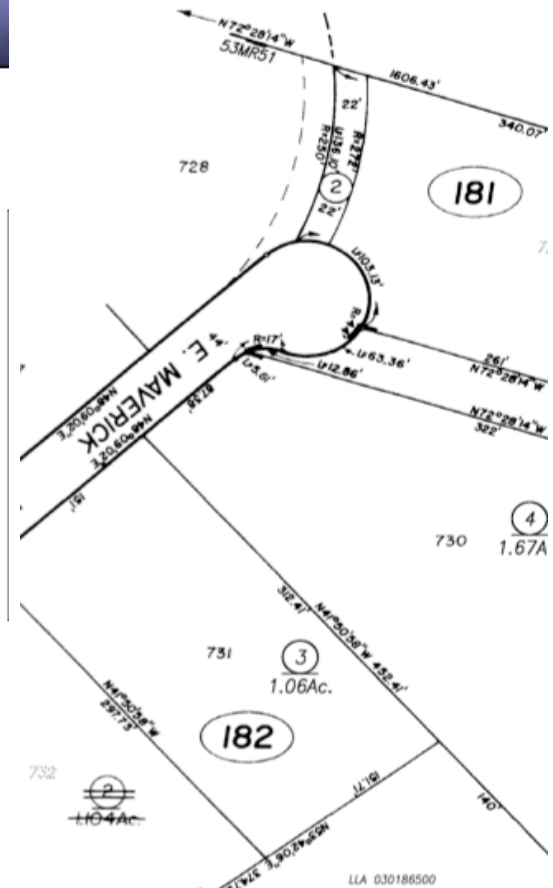
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Agoura, CA  
 Primary Owner: BOEING NORTH AMERICAN INC  
 APN: 685-0-060-295

22 Hacienda Rd , CA  
 Primary Owner: BOEING NORTH AMERICAN INC  
 APN: 685-0-060-145

Maverick Ln Bell Canyon, CA 91307  
 Primary Owner: BOEING NORTH AMERICAN INC  
 APN: 850-0-181-025

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  - More Info/Config
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- QuickProfile
  - QuickProfile w/ Cover Page
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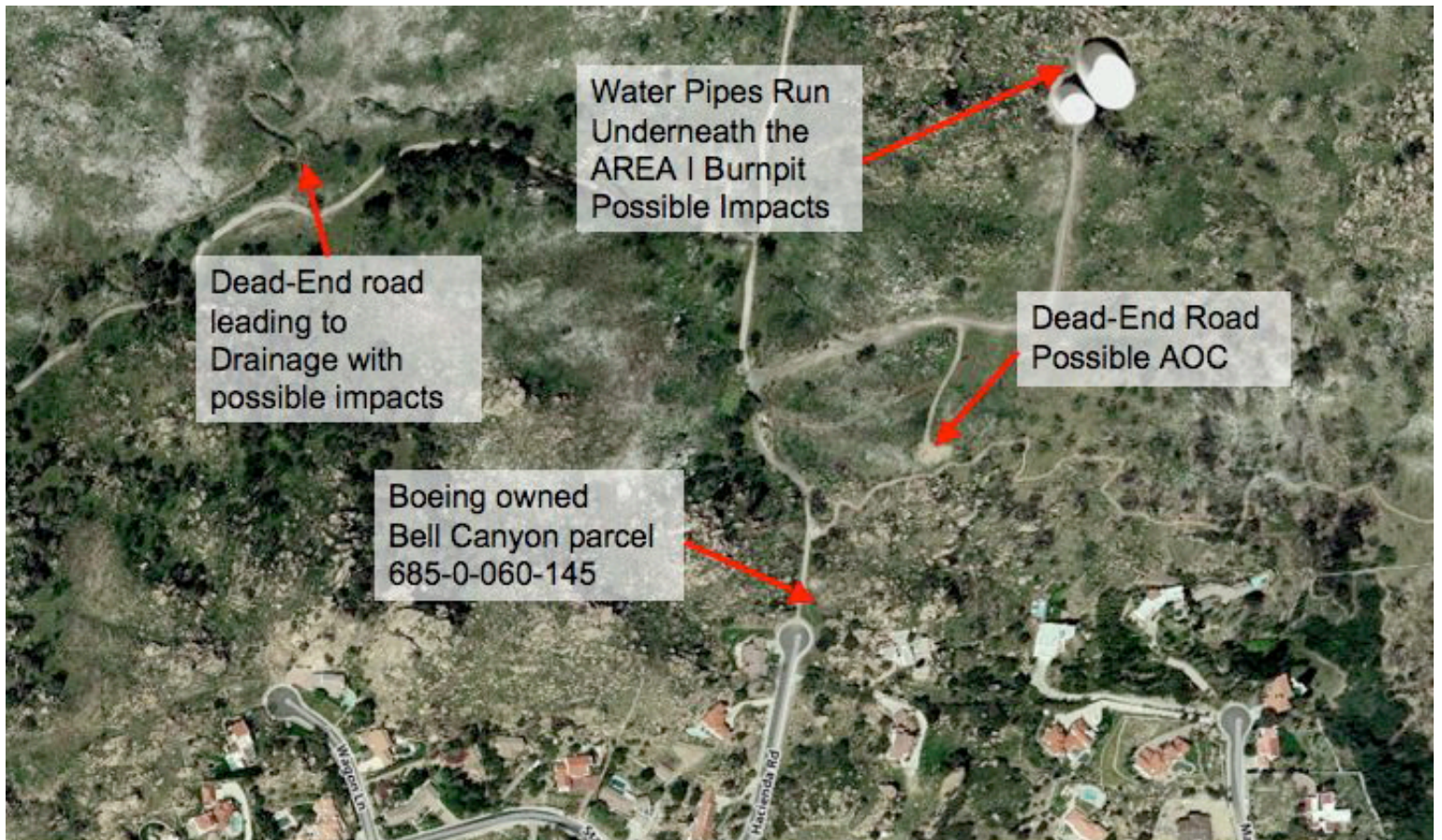


DEFINITION	SUFFIX NUMBERS
0 - Surface & Mineral Interest	0
1 } Multiple Interest	1
	2
	3
4 - Mineral Interest Only	4
5 - Surface Interest Except All or Part Mineral Interest	5
6	6

In older USGS Topography Maps there is an indication of roadways leading from the SBZ through Bell Canyon into the Upper Las Virgenes Open Space formerly Ahmanson Ranch. This could be one of the sources of contamination found in the late 1990's. Another reason this road is key, it has access to the back gate of the Calabasas Landfill. Prior to 1980 the Calabasas Landfill was licensed to receive Hazardous Waste. In the year 1979 there were over 500,000 tons of Rocketdyne waste delivered to the Calabasas Landfill. According to the documents there were deliveries of Solvents, Oil, Mud and Water.

[http://www.h2ohno.com/images/1979\\_Calabasas\\_Landfill\\_Industrial\\_Hazardous\\_Liquid\\_Waste\\_Report\\_William\\_Preston\\_Bowling\\_Rocketdyne\\_Boeing\\_Santa\\_Susana\\_Nuclear\\_Field\\_Lab\\_H2Ohno\\_Dot\\_Com.pdf](http://www.h2ohno.com/images/1979_Calabasas_Landfill_Industrial_Hazardous_Liquid_Waste_Report_William_Preston_Bowling_Rocketdyne_Boeing_Santa_Susana_Nuclear_Field_Lab_H2Ohno_Dot_Com.pdf)





Aside from the parcel on Maverick Lane (Assessor's Parcel Number 850-0-181-025), Boeing North American owns parcel 685-0-060-145 at 22 Hacienda Road. Both of these lots are visible on the cover of your August 3<sup>rd</sup>, Powerpoint Presentation.



From looking at the photo on the top of the page we see a dead-end road that should be looked into for a possible dumpsite from past operations of the SSFL. The 1968 purchase of the buffer zone was from the contamination of livestock that put ranchers out of business according to a local landowner (Techlaw, Inc. October 4, 1990 Final Report).

In 1968, North American Rockwell (hereinafter "NAR"), corporate successor to NAA as of September 22, 1967, increased its land holdings at the SSFL site by 1,032.30 acres. By way of a Corporation Grant Deed, the Spruce Land Corporation sold to NAR a portion of Tract P of the Rancho Simi, as per map in Book 3, Page 7 of Maps. The Deed, recorded on September 30, 1968, in Book 3373, Page 508, described the property as follows (RCK 31237 - 31239):



Prior to the SBZ purchase a berm was constructed to keep contamination off the Spruce Land Holdings. The berm failed and a subsequent purchase was implemented. This berm needs to be identified and ACME requests this information become public.



Debris ID: CHB-G10-1005.



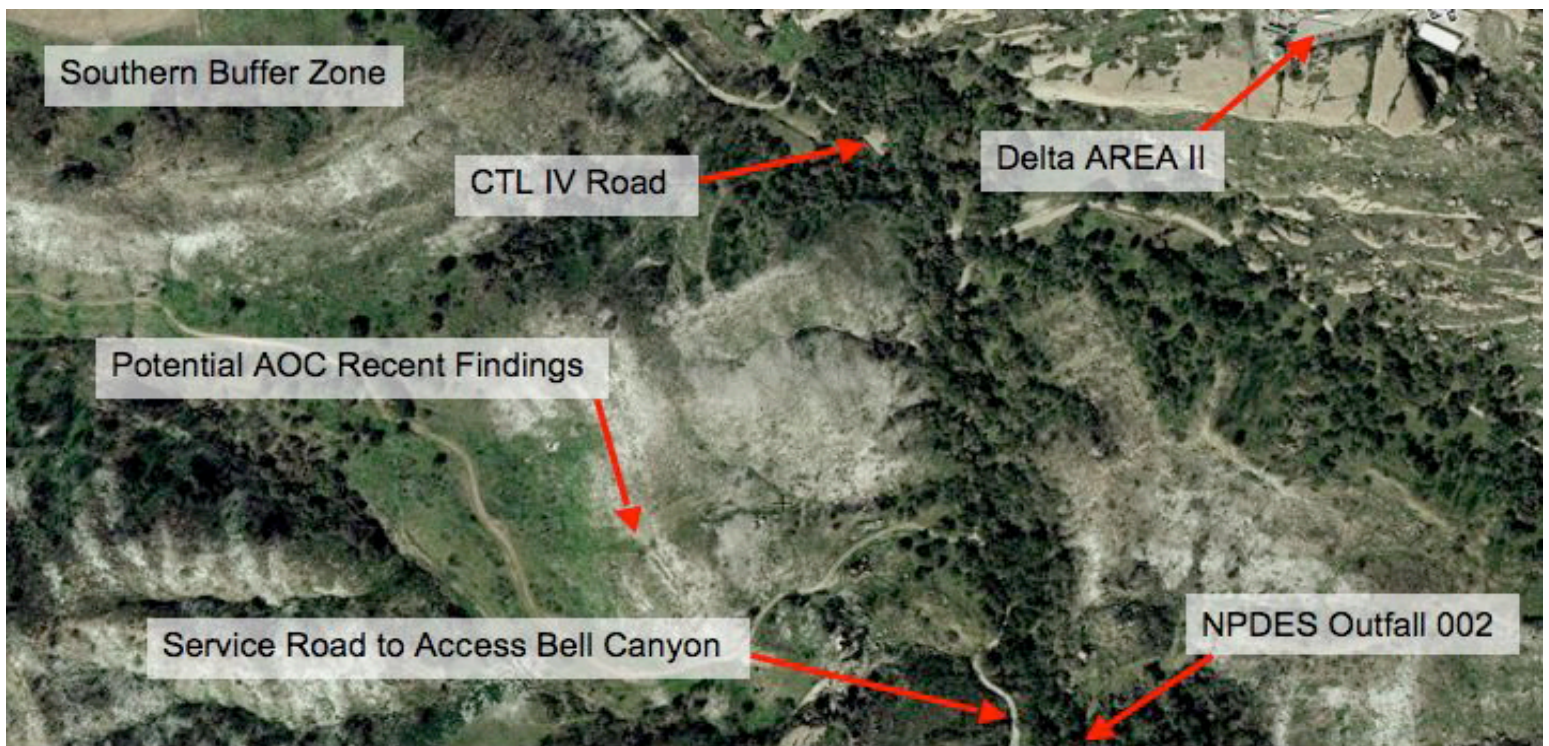
Debris ID: CHB-G10-2019.

A picture is worth a thousand words or every picture tells a story. Just looking at the photos (such as the ones above) have helped locate potential areas of concern. In Debris ID: CHB-G10-1005 you will see a 55 Gallon Drum in the Drainage of the SBZ that drains into the L.A. River through a channel that feeds Bell Creek. Notice the Concrete film on the inner wall of the drum. From former employee interviews we have found that to secure Hazardous or Radiological Liquid Waste they would pour concrete slurry into the mix to make it safe for transport as a solid. How did the 55 Gallon Drum get there? It was also told to ACME that if the concrete would not harden they would dispose of the waste by placing the drum in a modified Ford Courier Pick-up truck and open the seal and dump into drainages in an effort to have the stormwater interact with the contents of the barrel with a process of dilution. In Debris ID: CHB-G10-2019 we see a 55 Gallon Drum that looks to be damaged. An interview with a former employee who worked at the AREA I Burn Pit (adjacent to the SBZ) recalls that "On Several Occasions" when burning waste, "Some would Get Away". The reaction from Chemicals and Radionuclides stored in drums have the potential to travel several feet to several hundred yards when coming in contact with other Chemicals, Fire, Air or Water. The Drum in CHB-G10-2019 could have potentially been thrown and rolled onto it's current banged up position from it's launch from the AREA I Burn Pit. We must not forget examples of the impacts waste destruction most notably in the July 1994 Chemical Explosion that killed Otto K. Heiney and Larry A. Pugh (Heiney vs. Rockwell Int'l - Filed July 1995 U.S. District Court).

The AREA I Burn Pit is not a relic from past operations. There are documents provided by The Boeing Co. that show waste destruction in the AREA I Burn Pit up until 1990 and former employees have said it was done even after that. We have just seen an example of this type of waste destruction in 1994 with Otto & Pugh near Building 359 in AREA I.

ALL the current debris areas as indicated by RFI Group 10 should be stepped out even further to evaluate the areas of potential impact. ACME agrees with the areas of "Public Interest" as they were part of an initial study of the theory that dead-end roads are dumping grounds.

Looking at the photo on Page FOUR we see the label "Water Pipes Run Underneath" There are documented pipes from the Water Towers in the SBZ to the SSFL for a portion of their main water supply. These towers also feed Bell Canyon as they are in Ventura County. Are they intact from earthquake damage? Do they have the potential to transport contaminants to and from the water user or user to user? In the Group 10 Figure 3-2B we see VOC's in Soil that Exceed the Residential Risk-Based Screening Level (RBSL) adjacent to these Domestic Water Tanks, so there is a major potential health issue here.



The above photo makes reference to the service road from Maverick Lane in Bell Canyon and the Components Test Laboratory IV (CTL IV) Road that starts at CTL IV, traveling through the Group 10 SBZ ending at the AREA I Burn Pit. This area needs to be considered and sampled in a wide manner including spreading out of the SBZ to offsite drainages and other areas of potential migration.



The photos on Page SIX also references "Potential AOC Recent Findings" of contamination over the RBSL with both Chemical and Radiological concerns. We need to know more. 55 Gallon Drums continue to be found in the Upper Las Virgenes Open Space formerly Known As Ahmanson Ranch and as a park that allows hundreds of visitors a week, this is a serious potential health risk. Please inform ACME when DTSC is to perform it's Offsite Study of the surrounding areas of the SSFL as we have items as this to contribute. With the amounts of Aluminum found, these areas should be examined further. We have read many documents of the fuel elements from radioactive facilities at the SSFL to be clad with Aluminum. Many of these were manufactured and shaved with a lathe onsite and taken down CTL IV Road to the AREA I Burn Pit for destruction. The Debris Area 2041 and UOSS1042 where Above RBSL's of Vanadium was found is the Dayton Canyon Access Road. With these findings and the Haley & Aldrich findings of offsite debris in Dayton Canyon 7 days after the October 10<sup>th</sup>, 2008 NFA from DTSC and the discovery of the "Old Road to Rocketdyne" from Dayton Canyon...

[http://acmela.org/images/ACME\\_Reports\\_Dayton\\_Canyon\\_-\\_THE\\_ROAD\\_to\\_ROCKETDYNE\\_Jan\\_28\\_of\\_2009.pdf](http://acmela.org/images/ACME_Reports_Dayton_Canyon_-_THE_ROAD_to_ROCKETDYNE_Jan_28_of_2009.pdf)

ACME requests that Dayton Canyon be re-opened as an investigation with your new project director. The Entire SBZ and documented access roads should be Ground Penetrating Radar Studied with step-out points along the way. This portion of Ventura County has the potential for health impacts in Los Angeles County as well and should be studied in more detail that two volumes of an RFI Report. Compared to the RFI sites in the other Groups the investigations in Group 10 have been minimal at best. With an area that shares property boundaries with dozens of homeowners a much needed further and complete investigation is what the Community deserves.

Thank Mr. Sheeks for taking the time to review and consider my comments for the Group 10 Resource Conservation Recovery Act Facility Investigation Report. In closing I would like to bring to your attention Section A.2.2 Human Exposure Assessment, Hypothetical Future Urban Child Residents should be noted that the likelihood of ingestion is far greater than studied. The Southern Buffer zone has the potential to be the first area of the SSFL to be released to a Parkland Entity. Children who play in parks, expose themselves to soil and plant-life by ingestion as some kids, eat dirt.

If there are any questions please call...310-428-5085

Thank you in advance for your time,

William Preston Bowling - Founder/Director

ACME (Aerospace Cancer Museum of Education)

<http://www.ACMEla.org> 23350 Lake Manor Drive, Chatsworth, California 91311