



Tom Skaug, Engineering Geologist
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(via e-mail and U.S. Mail)

6/4/2009

cc. Allen Elliott - NASA, Merrilee Fellows - NASA, Art Lenox - The Boeing Co., Thomas Johnson - DOE, Norm Riley - DTSC, Susan Callery - DTSC, Christina Walsh Cleanuprocketdyne dot org, Phyllis Winger for Los Angeles City Council District 12 Councilmember Greig Smith, Louise Rishoff for Assemblymember Julia Brownley, Aron Miller for State Senator Fran Pavley, City of Simi Valley Assistant City Manager Laura Behjan, City of Simi Valley Manager Mike Sedell, Simi Valley Mayor Paul Miller, Simi Valley Mayor Pro Tem Barbara Williamson, Simi Valley Councilmember Steve Sojka, Simi Valley Councilmember Michele Foster, Simi Valley Councilmember Glen Becerra and Ventura County Supervisor Linda Parks.

Dear Mr. Skaug,

Enclosed please find my comments for the Group 2 Resource Conservation Recovery Act Facility Investigation (Group 5 RFI Report) representing the results of contamination and debris in the portions of the National Aeronautics and Space Administration (NASA) AREA II and the Boeing Co. AREA I including the AREA I NASA LOX portions of the Santa Susana Field Laboratory (SSFL) that drains onto the American Jewish University's Brandeis-Bardin Campus (BBI) and other areas of City of Simi Valley.

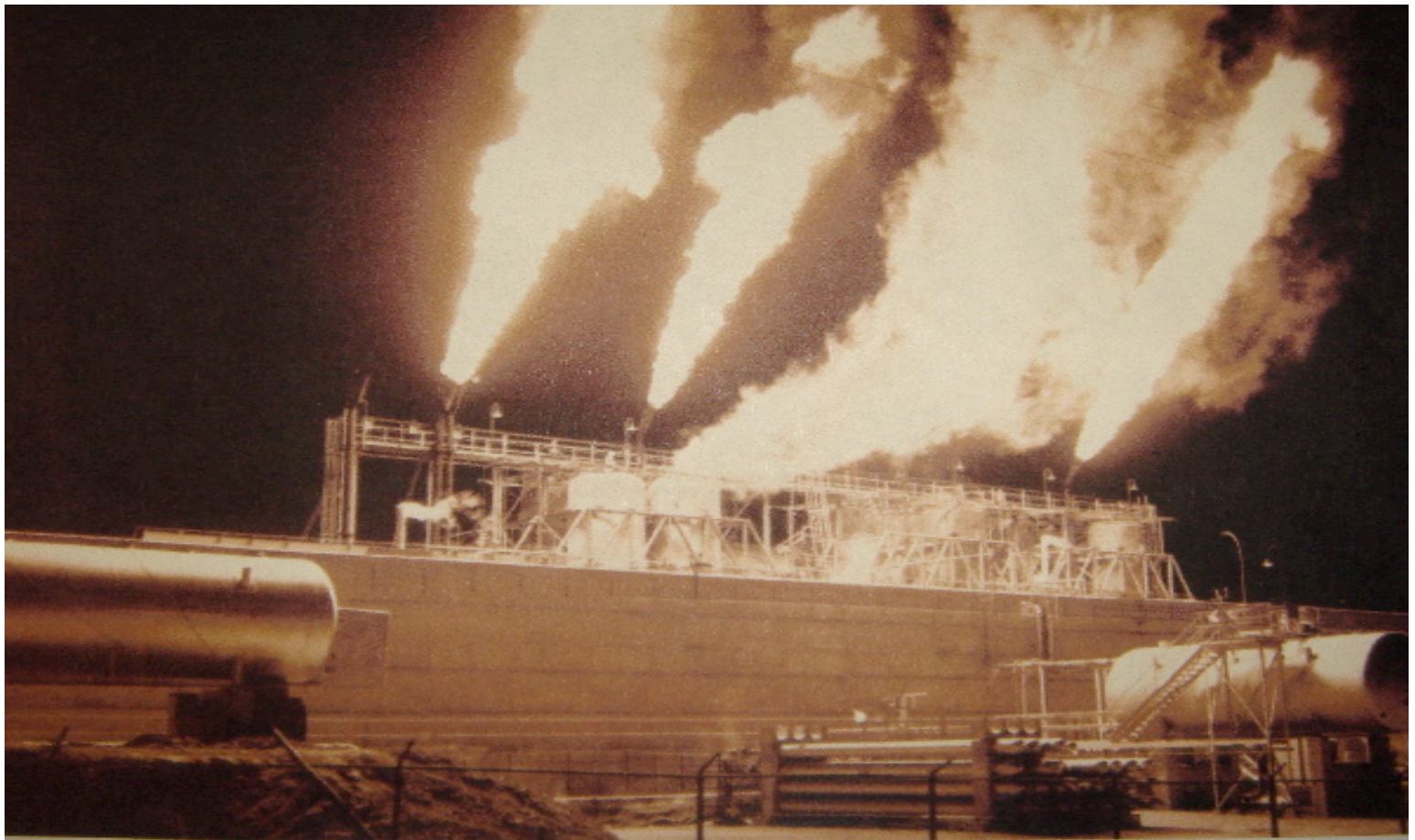
DTSC needs to get more historical data regarding the operations of what is known as the NASA LOX Plant. Prior to NASA ownership, Air Products Inc. and the United States Air Force (USAF) operated this RFI Facility (Air Force Plant #64). ACME (Aerospace Cancer Museum of Education) requests that the Department of Toxic Substances Control (DTSC) obtain these records and do a revised comment period for the NASA LOX facility as a whole. This is an area that has an extremely high Trichloroethylene (TCE) vapor problem according to DTSC. These vapors are Cancerous among other health impacts.



Under the FUDS ACT (Former Utilized Defense Site) the United States Army Corps of Engineers (USACE) are responsible for cleanup of contaminated former Air Force Plants (NASA LOX facility was former Air Force Plant #64). DTSC should contact the USACE as well as Air Products Inc & USAF for details regarding historical data and responsibility.

Learning more about LOX (Liquid Oxygen) ACME has found that thousands of gallons of Trichloroethylene (TCE) is needed daily to clean pipes in order for normal operating conditions. The LOX operations were daily run for decades, the number of gallons of TCE could be potentially millions of gallons. There are large plumes of TCE in the northern drainage of SSFL's AREA I and it has migrated offside onto the Santa Monica Mountains Conservancy parkland named Sage Ranch. LOX tanks that exist or have been removed and the surrounding areas in the rest of the Group 2 RFI area should be sampled and analyzed for TCE and cleaned up properly.

The Expendable Launch Vehicle (ELV) Facility (BELOW PHOTO) was formerly known as Components Test Laboratory (CTL) II and wherever CTL II is referenced it should be known that the ELV is the same facility. ACME requests that DTSC obtain these records and do a revised comment period for the CTL II/ELV facility as well.



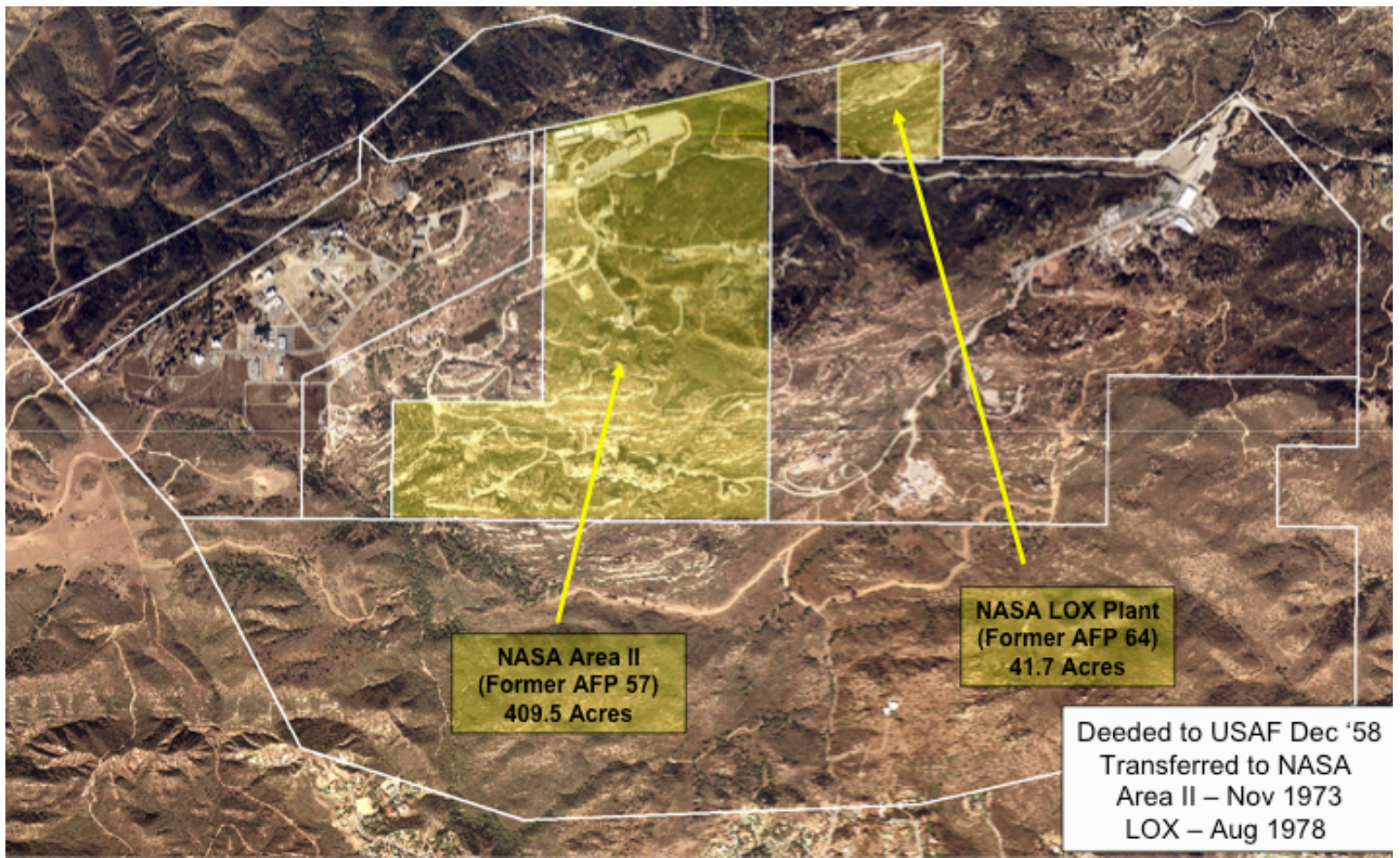
Component Test Laboratory (CTL) II - Turbopump Test Facility

All of the buildings that were used as storage after their main purpose has been utilized NEED TO BE CONSIDERED TO BE SAMPLED WITH ANALYSIS AND CLEANED UP TO Senate Bill 990 (SB990) Standards. The areas in the Group 2 RFI labeled as NFA (No Further Action) should be rejected & revisited. No Further Action on a site that is referred to by California EPA Secretary Linda S. Adams as "contaminated with radioactive and chemical substances that seriously threaten public health and the environment." Is the wrong answer for the health and safety of the children of the American Jewish University's Brandeis-Bardin Campus (BBI) and the City of Simi Valley.

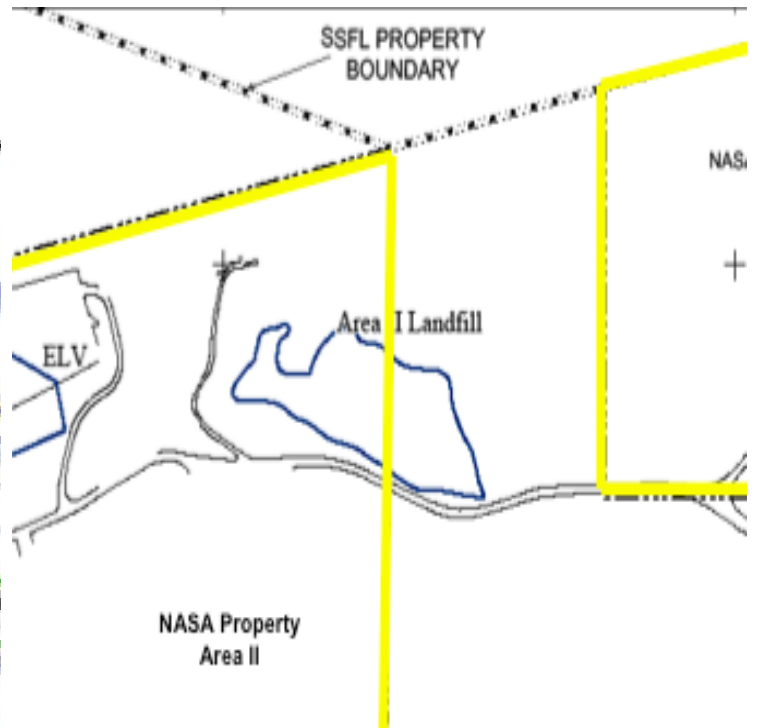
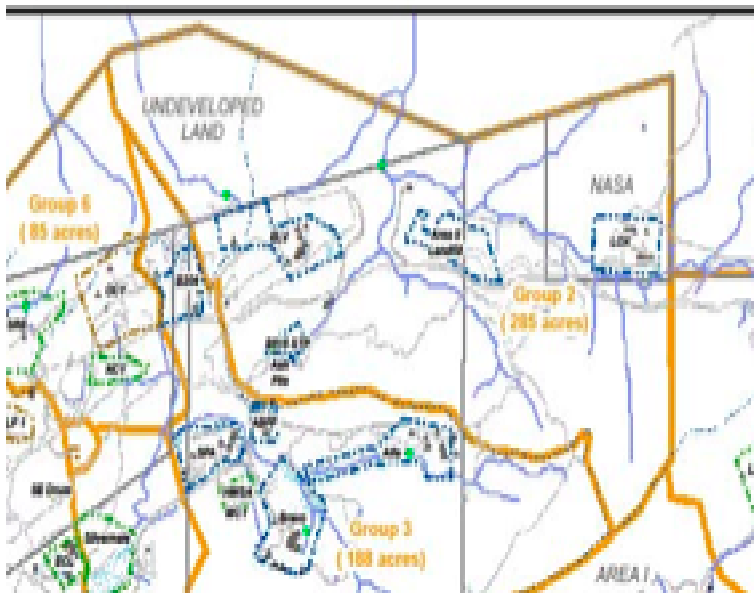
http://acmela.org/images/Feb_2009_EPA_SSFL_Letter.pdf

We also have seen in many facilities that are no longer in operation to be used as storage like the photo seen below of storage in a former Rocket-Engine Test Bay.



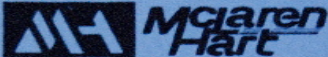


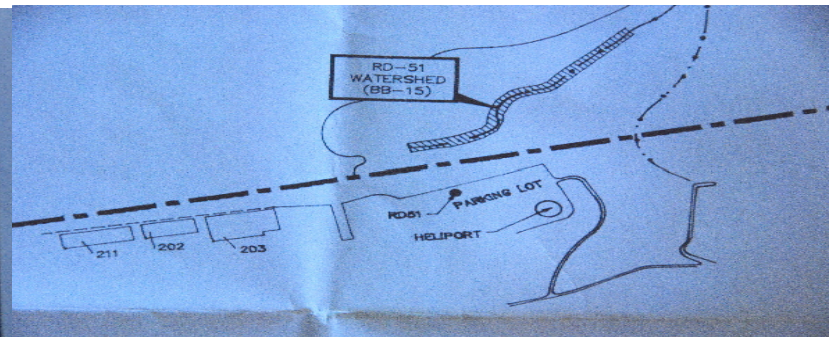
The area we see to the north of NASA's AREA II is the SSFL Northern Buffer Zone. This area is impacted by the operations of AREA II and the above map that NASA provided should show the Group 2 RFI include this area.





The drain pipes from this facility drains into the Northern Buffer Zone which prior to 1993 was the American Jewish University's Brandeis-Bardin Campus (BBI). The 1992 McClaren-Hart Investigations discovered exceeding levels of Plutonium in the RD-51 Well Watershed. This contaminated property was subsequently purchased by the Responsible Parties (RP) from the BBI - This does not solve the problem. Why? Everytime it rains this contamination makes it's way down the hill, it's called gravity. One more thing, this drainage misses the Los Angeles Regional Water Quality Control Board (LARWQCB) NPDES Permitted Outfall 009. Everytime Outfall 009 is sampled, the chemicals, metals and radionuclides of the RD-51 Watershed is missed threatening the health of BBI.

			
FIGURE 3-2 SAMPLING LOCATIONS AT THE BRANDEIS BARDIN INSTITUTE			
DRAWN BY G.N.	DATE 10/28/92	LIMITS ON DIMENSIONS UNLESS OTHERWISE SPECIFIED	FRAC. DEC. ANG.
CHECKED BY	DATE	ISSUE	DRAWING NUMBER BRANDEIS
APPROVED BY	DATE		
SCALE	REFER		



in June 2002 (MWH, 2003g). There is no drinking water standard established for this compound. The evaluation identified no offsite data gaps.

- **Other Compounds.** No other compounds have been detected at levels above the screening levels in groundwater or seeps and springs north of the Group 2 RFI area. Additional details are provided in the Offsite Data Evaluation Report (MWH, 2007ba).

6.4 Nature and Extent of Contamination

The analyses of available data, including the offsite sampling results presented in the Offsite Data Evaluation Report (MWH, 2007b) indicate that the groundwater flow system has not transported contaminants from beneath SSFL to offsite locations north of the Group 2 RFI area (MWH, 2007ba).

6.5 Conceptual Site Exposure Model

The generalized ecological CSM for Group 2 is presented in Section 1.5.4.1. Because the hill slopes adjacent to SSFL are strictly terrestrial locations, only the terrestrial pathways are relevant. The generalized CSM specific to the hill slopes and offsite area is an area with undefined flow paths and no specific exposure points, where there is no apparent connection to the SMOU in the Group 2 RFI study area. Because VOCs are not detected in the springs and seeps, retardation of plumes may occur within the flow paths that probably extend from beneath SSFL to the hill slopes, thus further lessening the potential of transport over significant distances and the creation of exposure pathways.

6.6 Fate and Transport for Chemicals in Surficial Media

Because no chemicals have been detected in surficial media on the hill slopes and offsite areas that would relate to COPCs in the Group 2 RFI SMOU, no fate and transport analysis is warranted.

6.7 Human Health Risk Assessment for Seeps and Springs

Because no COPCs have been detected in the seeps and springs, no HHRA is warranted. The elevated Potassium-40 concentration was not evaluated because it is an essential nutrient and discharge through the surficial media is not confirmed.

6.8 Ecological Health Risk Assessment for Seeps and Springs

Because no COPCs have been detected in the seeps and springs, an ERA is not warranted.

In section 6.6 of the Group 2 RFI summary it states that no chemicals have been detected offsite is FALSE. On section 6.7 an HHRA is needed, please take action.

Another concern ACME has is the fact that the AREA II Landfill took waste from Canoga, (TechLaw, Inc. Final Report SSFL Air Force Plant No. 57 Site Operations/Ownership History prepared for the U.S. Army Corps of Engineers in October of 1990, Section - Interview of Former Rocketdyne Employee Rolf D. Schmued Page B-40) This report needs to be entered into the DTSC records and used in the Group 2 RFI. The shipping logs should be summoned to see what are the contents of this landfill so we can better characterize this area of concern. There are still TONS of Debris clearly visible at the AREA II Landfill. Once again this watershed impacts the BBI and City of Simi Valley. This characterization and cleanup needs to be done right, there are no more chances at this. We cannot afford to risk the health of the people below any longer.

Mr. Schmued was aware of two landfills at SSFL. One was located behind the maintenance shop and was operated before he had much contact with SSFL. He believed that only hardware, not chemicals, were disposed of there. A second landfill was in Area II. Numerous chemicals, possibly some from Canoga, were buried there. The drums that contained these chemicals were later unearthed under Mr. Schmued's supervision and properly disposed of as hazardous wastes.



The above photo from the NASA LOX AREA indicates still remaining debris including the blocks of Antimony containing insulation material that causes health problems including heart failure. This photo was taken on May 28th, 2009 on a site visit with NASA Representatives.