



AEROSPACE CONTAMINATION MUSEUM OF EDUCATION

Tom Skaug, Engineering Geologist

9/21/2010

California Department of Toxic Substances Control (DTSC) 8800 Cal Center Drive, Sacramento, California 95826 (Via Electronic Mail)



ACME (Aerospace Contamination Museum of Education) has provided the below comments for the Group 4 Resource Conservation and Recovery Act (RCRA) Facility Investigation Sampling and Analysis Plan (SAP) Report of the Santa Susana Field Laboratory (SSFL) AREA II portion delivered to DTSC on April 29th, 2009 by Boeing.

Dear Mr. Skaug,

I would like to point out the area in the below photo - the far left - COCA AREA II of the Santa Susana Field Laboratory (SSFL) owned by the National Aeronautics and Space Administration (NASA). This open area has been a dumping ground for the last decade and upon meeting with representatives from NASA they felt this area should be added into the RFI Area of Concern. Please make a note of it and contact NASA for the correct map. The majority of this dumpsite feeds the Los Angeles River, and with the recent decision from the Environmental Protection Agency (EPA) regarding the true navigability of this waterway, should be a concern to the department (DTSC).



Please review the August 15th, 2008 Document from Jose Marcos, P.G. (DTSC) to Gerard Abrams CHG (DTSC) PCA:22120 Site Code:300122 WP:48 MPC:37 WR:740433 and the document dated August 5th, 2008 from Brian Faulkner, Ph.D. Human and Ecological Risk Division (HERD-DTSC) to Gerard Abrams CHG (DTSC) PCA:22120 Site Code:530033-48 MPC:38. In order to understand the complexity of this reporting area.

ACME would like to see a consistency in the Group 4 Resource Conservation and Recovery Act (RCRA) Facility Investigation Sampling and Analysis Plan (SAP) and the August 27th, 2010 Draft Soil Background Sampling and Analysis Plan (SHEA-110310) submitted by The Boeing Co. to DTSC. These comments are most important as in the few weeks past NASA has reached "Agreements in Principle" that are regulated under the strict guidelines of Senate Bill 990 (SB 990), a California Law to which this process must be measured.

The September 3rd, 2010 DOE Agreement in Principle...

http://www.acmela.org/images/FINAL_NASA_Agreement_in_Principle_DTSC_September_3_of_2010.pdf

The Possible Exceptions of Cleaning Up the Chemical Contaminants to Local Background Concentrations as pointed out by Rick Brausch (DTSC) at the September 16th, 2010 SSFL (Rocketdyne) Workgroup Meeting was disturbing Protected Species or Habitat shown in his PowerPoint below...

http://www.dtsc-ssfl.com/files/lib_pub_involve/meeting_agendas/64727_Agreements_in_Principle.pdf

One thing that I made DTSC and the Workgroup aware of, that there could be a potential loophole (possible way for the Responsible Parties to limit areas of proper cleanup) in the Protected Species Clause in the Agreement in Principle (AIP). Oak trees are protected in the state of California and there are many in and around the field lab. In October of 2008 the total of Class C Explosives (Rocket Engine Igniters) found in the Northern Drainage Cleanup was 1100. They were found under an oak tree when it was removed. It is common practice, even in landfills today to plant over trash. That is a potential scenario with the found explosives...They were buried and trees were planted over the waste. The protected species clause needs to be re-worded as maybe trees or plants older than the development of the Santa Susana Field Laboratory (SSFL) could be suspect. When the SSFL was built, the entire site was grazed to a moonscape, then built upon. So any of the plant species after 1947 could be suspect.

Groundwater impacts and how they relate to the faults demonstrates the need for the subsurface impacts to be resolved and sampling points need to be identified. Surface water samples should also be taken "in every drainage" in the reporting area of Group 4.

Thank You Mr. Skaug for taking the time to review and consider these comments for the Group 4 Resource Conservation Recovery Act Facility Sampling and Analysis Plan.

Sincerely,

William Preston Bowling 310-428-5085
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cc: Merrilee Fellows & Allen Elliott - NASA, Tom Gallecher & Kamara Sams - The Boeing Co., Stephanie Jennings & Bill Backous - DOE, Cal EPA Secretary Linda Adams, Maziar Movassaghi, Rick Brausch, Gerard Abrams, Mark Malinowski & Susan Callery - DTSC, Billie Greer for Governor Arnold Schwarzenegger, Assemblymember Audra Strickland, Jarrod De Gonia for Assemblymember Cameron Smyth, Louise Rischoff for Assemblymember Julia Brownley, Rebekah Rodriguez-Lynn for Senator Fran Pavley, Ventura County Supervisors Linda Parks and Peter Foy, Shelly Backlar - Friends of the Los Angeles River

