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(via e-mail and U.S. Mail)

5/14/2009

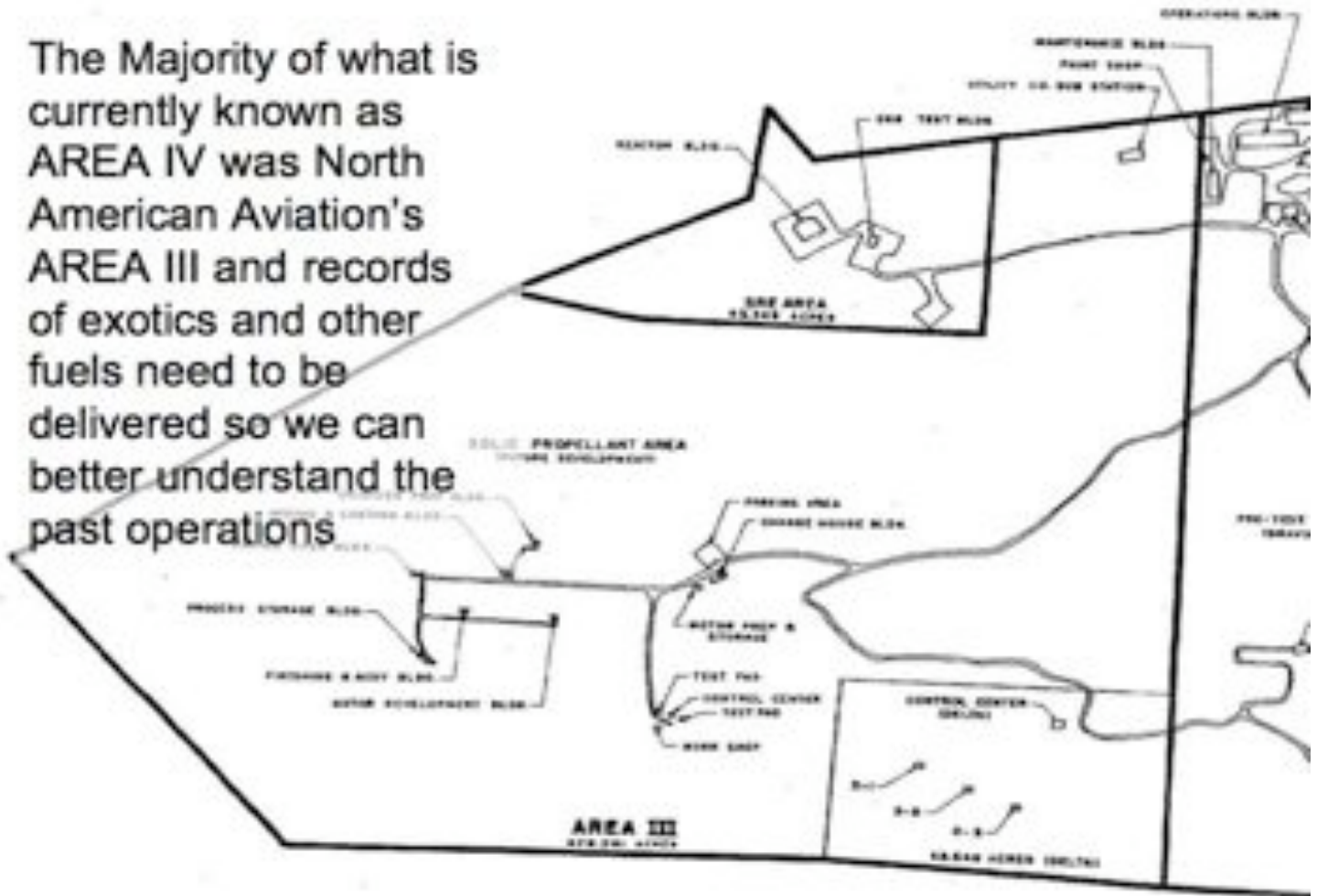
cc. Art Lenox – The Boeing Co., Thomas Johnson – DOE, Norm Riley & Susan Callery - DTSC, Shelly Backlar Friends of the Los Angeles River, David Beckman NRDC, Christina Walsh Cleanuprocketdyne dot org, Phyllis Winger for Los Angeles City Council District 12 Councilmember Greig Smith, Louise Rishoff for Assemblymember Julia Brownley and Aron Miller for State Senator Fran Pavley.

Dear Ms. Rainey,

Enclosed please find my comments for the Group 5 Resource Conservation Recovery Act Facility Investigation (Group 5 RFI Report) representing the results of contamination and debris in the AREA III & AREA IV portions of the Santa Susana Field Laboratory (SSFL).

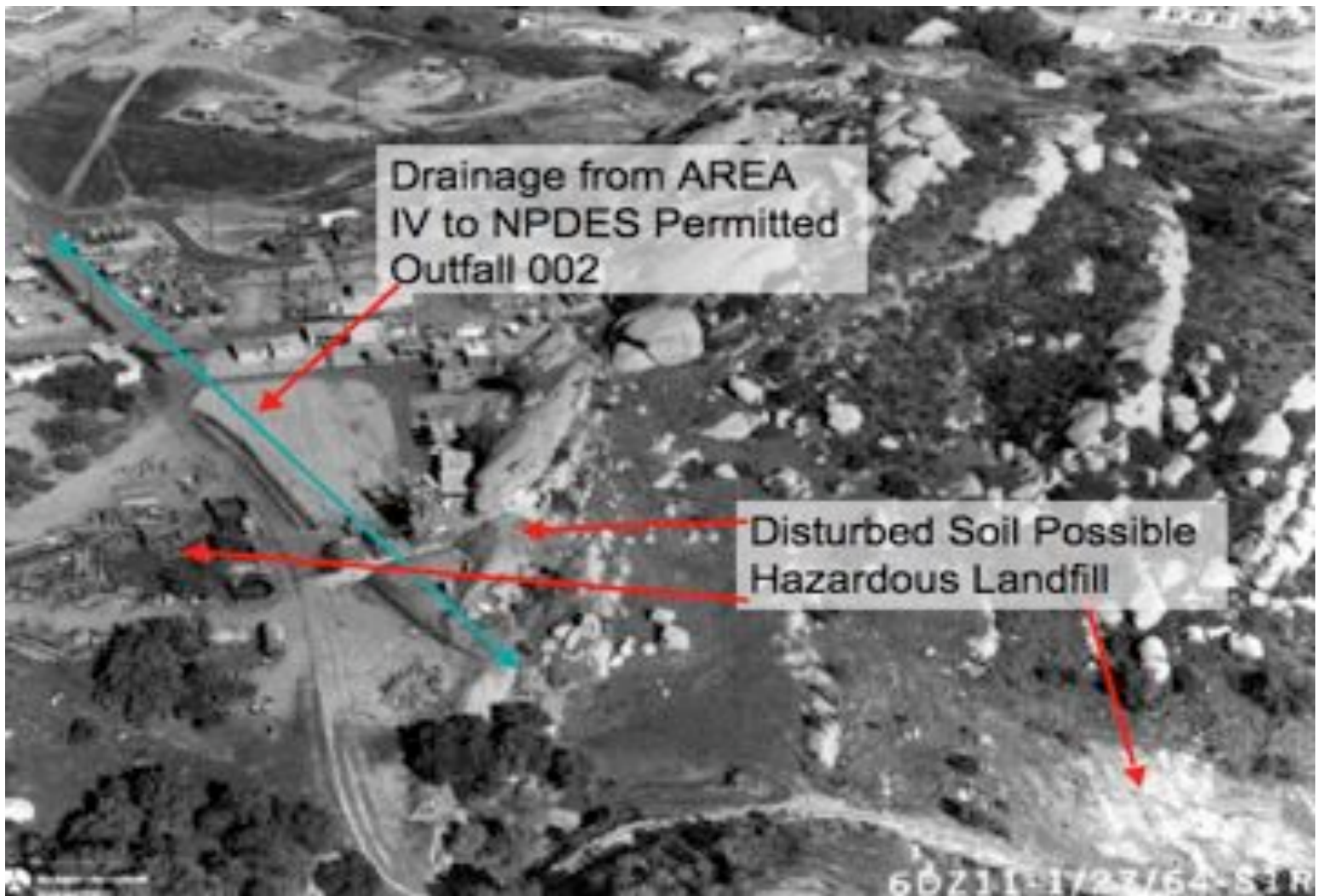


This chemical contamination investigation including the many Area IV Leach Fields, the Building 100 trench, the Rockwell International Hot Laboratory, and the Systems for Nuclear Auxiliary Power Facilities among others are an important step in the cleanup process, yet I feel that not enough attention is paid to Concrete Pads. Wherever there was a Concrete Pad, there was Drum Storage, please sample in these areas. These areas are located in the central portion of Areas III and IV of the Santa Susana Field Laboratory in the Simi Hills of Ventura County with drainage of this Group into Los Angeles County via Bell Creek - headwaters to the L.A. River.



The CTL IV ROAD just below the facility to the south is a direct connection to the AREA I Burn Pit. After blaming dials in a November 2008 discovery of Radium in the AREA I Burn Pit, did the responsible parties properly transport & dispose of the dials from CTL IV? Was the Public at Risk as they removed this facility before adequate sampling was completed?





As we expand outward from these operational areas we tend to find waste sites as tons of waste was generated, they needed somewhere close enough to dispose, yet at a distance. These areas need to be included as areas of concern and sampling. As we see by the photo below, storage of explosives and volatiles were stored close, yet far from CTL/STL IV, these areas need to be sampled as well. This is a tributary to the Los Angeles River.

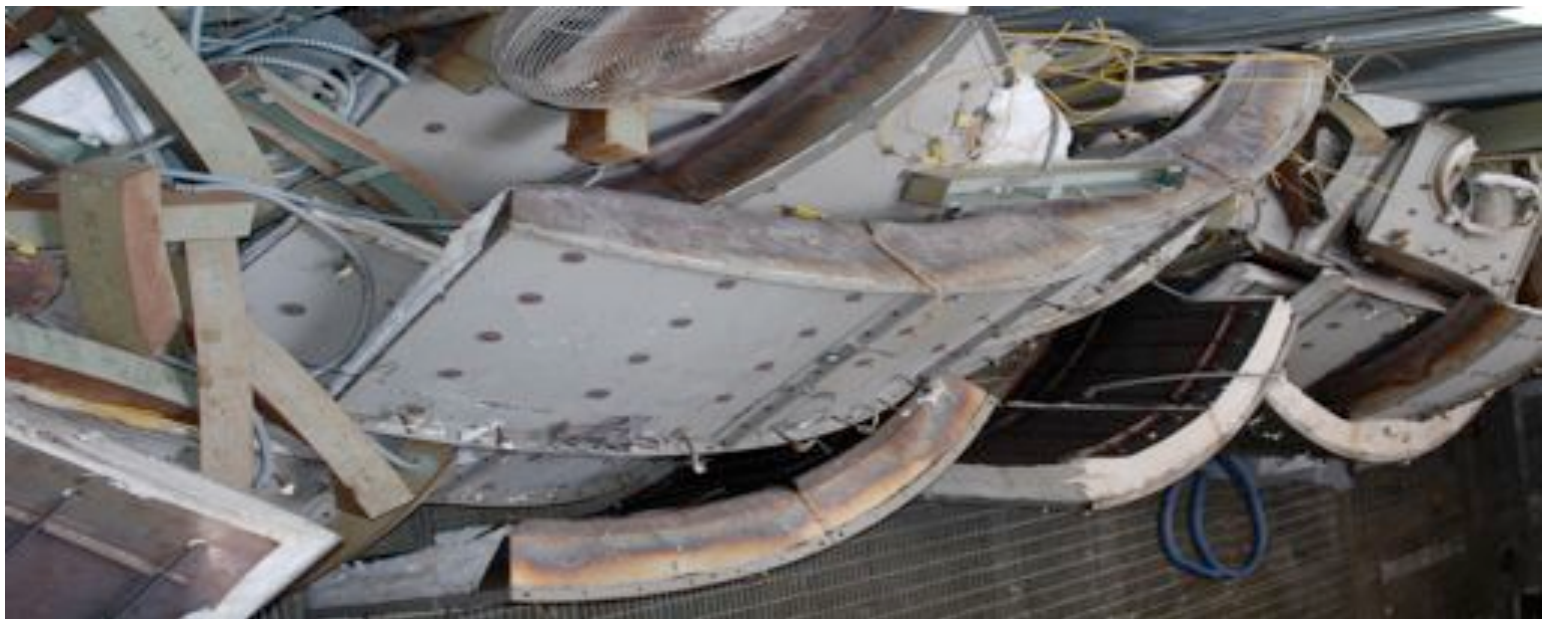




The area above labeled as Drum Storage is located to the east of Building 4012 and should be included in this investigation. Do we know all the chemicals used in these areas? Are we doing enough sampling to ensure public safety? This should be top priority. Keep in mind this was primarily the Nuclear area of the Santa Susana Field Laboratory. High concentrations of Alcohol were found in past sampling in the soil & groundwater. When Alcohol is found around a former Nuclear Reactor, there are concerns. Please link to the below report...

[http://www.etec.energy.gov/library/Groundwater/RI-RD-92-186 Tritium Production at SSFL.pdf](http://www.etec.energy.gov/library/Groundwater/RI-RD-92-186_Tritium_Production_at_SSFL.pdf)

On page 23 of the PDF in the third paragraph below Figure 3-5 we see that Residual Sodium was passivated with Alcohol, which was solidified and disposed of as radioactive waste. These methods of disposal over the years could have meant sitting on Concrete Pads and rusting away with leaks of radioactively contaminated Alcohol. The below photo is the 2007 remediation of the Sodium Pump Test Facility (SPTF). Although the building is still standing, the interior was gutted and sent offsite for disposal. The below photo shows insulation for piping that may contain Asbestos (as per the posted Asbestos Warning Signs). Alcohol was also used in mass quantities at the SPTF and its connecting facility the Components Handling & Cleaning Facility (CHCF). TCE was used throughout the site for cleaning piping and should be looked into at this facility.



The Below Photo shows the SSFL AREA IV Buildings 4009 (Top Left), Building 4009 (Top Middle) and the large building with the Radioactive Gas Smokestack, Building 4020, the Rockwell International Hot Lab (RIHL).

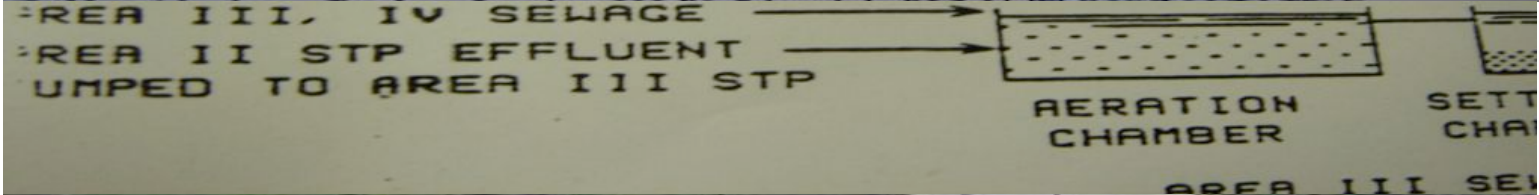


The above photos shows areas that needed to be sampled that are a concern to ACME.



Parking lot (4520) of the Rockwell International Hot Lab. As you can see from the above photo SAMPLING IS NEEDED as it was used for Hazardous Waste Interim Storage as the RIHL was being demolished. The recommendations of CH2M Hill (Boeing & DOE Contractor) Not to Sample this parking lot is a potential for leaving harmful toxins in the ground. Rain after rain will then wash these toxins into the R-2 Pond and overflowing into the Los Angeles River via Bell Creek. With the removal of all buildings in the northern area of CTL/STL IV in AREA III the runoff from this parking lot will have a more direct pathway to the R-2 pond in AREA II that will potentially impact the Los Angeles River.

The Sewer Lines from AREA II, III and IV impact the Group 5 Resource Conservation Recovery Act Facility Investigation areas. These lines come from Hazardous Sink effluent aside from the toilets. All of the chemicals & metals found in other areas such as NASA's AREA II should be investigated in and around these sewer pipe locations.





The areas labeled as NFA (No Further Action) should be rejected & revisited thoroughly. The above photo area right of DOE LF 1 exceeds background & the ECO RBSL for metals should be noted this was a shipping & receiving area (as seen in Below Photograph).

Photograph – Building 4641





We need to look into the Mercury Contamination around Building 4374, we have seen similar levels at the SRE Complex. We should look more into this relationship between reactors and the releases of Mercury.



All of the buildings that were used as storage after their main purpose has been utilized NEED TO BE CONSIDERED TO BE SAMPLED. 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."

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

Site Identification: What did building 020 look like?



The Photo with the title Hot Lab Looking North, we see mounded material in the foreground. This area is a dumpsite and should be sampled & analyzed extensively.

Photograph – 17th Street Drainage



The 17th Street drainage from the SSFL AREA IV drains into AREA III and then into the NASA AREA II R-2 Pond and releases into the Los Angeles River via Bell Creek. There have been elevated levels of Radioactive Cesium 137 found in this drainage and this radionuclide and its daughter products should be sampled for in these drainages.

Photograph – Building 4500



The above photo is another example of Concrete Pads and they are as important in this Group 5 Resource Conservation Recovery Act Facility Investigation as the Building Investigations and Operational History.

Photograph – Building 4363

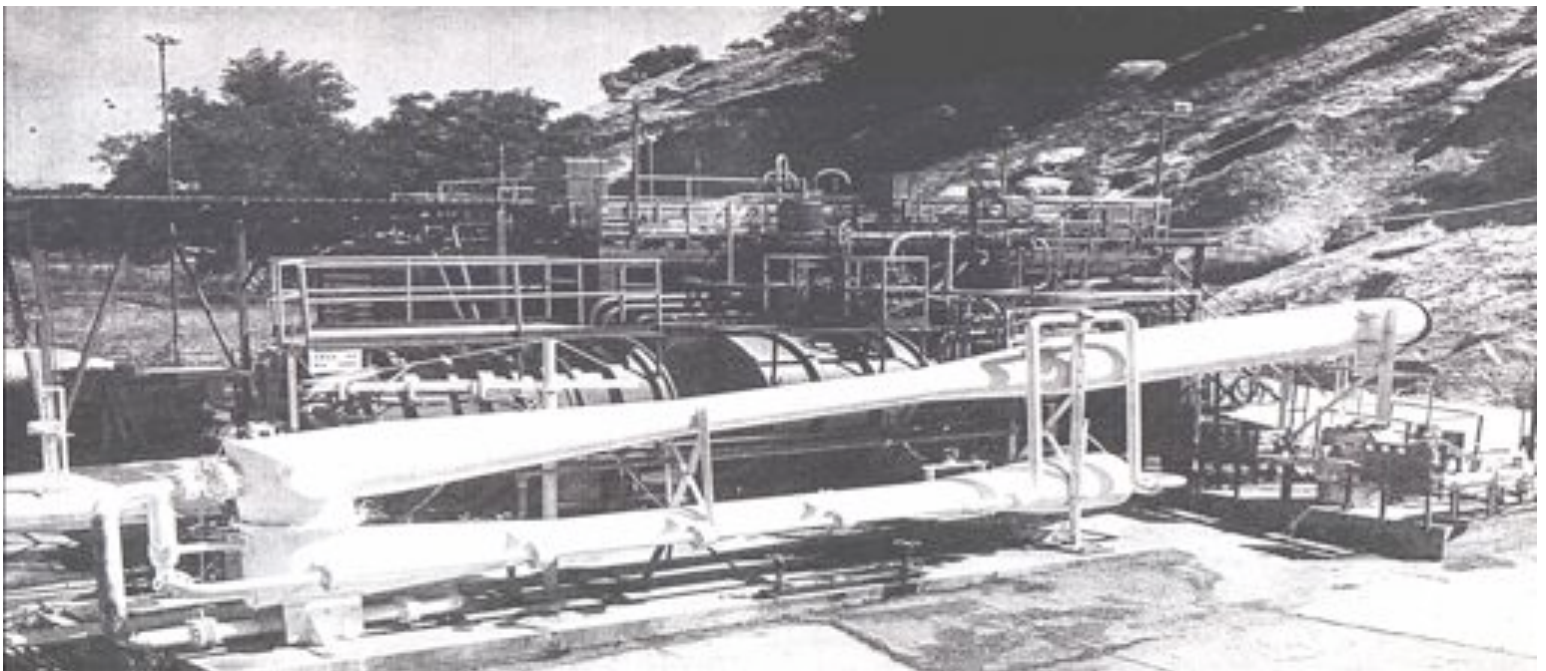


The Locations of former Well Heads and Manhole Covers such as the small concrete square shown above at the Building 4363 Sidewalk. With many of these buildings torn down we have to spread out with a larger grid of sampling & analysis.

FSDF Soil Destined for Kettleman



The fact that the SSFL is used for storage of waste from AREA to AREA we need to take in the entire suite of site-wide chemicals and radionuclides.



Notice the stained concrete in the above photo of Cell 37 Altitude Test Capsule and Steam Ejector located at CTL/STL IV in AREA III of the SSFL owned by the Boeing Co. This facility was demolished first and the sampling started after and continues. With the lack of sampling warranted in the Building Documentation Features, this is a concern.



Above photos are inside the Decon-Room/Clean-Room Trailer at CTL/STL IV at the SSFL.

The below photo is outside the Decon Room/Clean Room Trailer at CTL/STL IV.



We see the uses of Freon and MMH in the clean room, notice the silver pipe that allows drainage from the Decon Sinks into this square concrete catch basin. This should be considered an Area of Concern and needs to be sampled & analyzed.





The above photo (Building 258 in AREA III) another example of the Concrete Pads in use.



A portion of the Building 258 storm water runoff drains into the Silvernale Pond which overflows into the R-2 Pond and releases into the Los Angeles River via Bell Creek.



The areas addressed as Safety Shower & Eye Bath need to be sampled as their primary uses were to clean contamination off exposed employees. The drainage seen in the photo below, around the CTL/STL IV Pretest Building 263 will never be understood as these buildings were removed prior to fully understanding it's contamination.





The above photograph shows the construction of Building 4020, the Rockwell International Hot Lab (RIHL) in November of 1958. We again see the history of debris left behind from the operations of North American Aviation, the parent to the Boeing Co., in the former AREA III as it converts to AREA IV. These debris areas need to be sampled & analyzed.



The uses of Hyrdazine and other "Exotics" used at CTL/STL IV need to be sampled & analyzed in a lager grid as we see storage of Hydrazine in several portions of this area.



The above photo is the AREA IV Borrow Pit and it's Surface water flow drains into Bell Canyon Creek. It is extremely important that we investigate this area in further detail. From first-hand accounts we are told it should be renamed the Borrow & Return Pit. It is troubling that the above water tanks (Tank 4701 and 4702) are not known how they get their water. In the SSFL AREA IV HSA prepared by Sapere Consulting for the Boeing Co., and the Department of Energy it documents on page 773 "Water only flowed out of the tank. It is unclear how it is refilled." This needs to be addressed, Sampled and Analyzed

Thank Ms. Rainey for taking the time to review and consider my comments and meet with the Boeing Co., CH2M Hill and ACME regarding the lack of Sampling Warranted and other points in regard to the Group 5 Resource Conservation Recovery Act Facility Investigation. Again, as I have said in past comments and in our meeting with Boeing, we need more photos of previous operational areas from over the years.

Thank you in advance for all your work on these issues and keeping us informed on associated correspondence and request you continue to do so.

If there are any questions please call...818-712-6903

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Parting Shot...The backfill of the removed Building 4020, the Rockwell International Hot Lab (RIHL) – Circa 1997.



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