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

Comments on the Standard Operating Procedures (SOP): Building Demolition Debris Characterization and Management for the Santa Susana Field Laboratory (SSFL) of February 24, 2010

ACME (Aerospace Cancer Museum of Education) has provided the below comments for the SOP on the SSFL. This SOP must follow the guidelines as set for in Senate Bill 990 (SB 990) to Ensure a Proper Cleanup. ACME monitored the Regional Water Quality Control Board's (RWQCB) Interim Source Removal Action (ISRA) of National Pollutant Discharge Elimination System (NPDES) permitted Outfalls 008 & 009 over the past year with robotic cameras and personal site visits and took our findings to The Boeing Co. (Below Photo)

http://acmela.org/images/Boeing_to_ACME_Demolition_Activities_February_22_of_2010.pdf



The above link will take you to a letter from The Boeing Co. which contains their thoughts on the ACME suggestions to the Demolition Activities that were conducted over the last year (Please read this letter in it's entirety and ask that you submit it as part of my comments). Our robotic Cameras were placed offsite in the Santa Monica Mountains Conservancy Parkland of Sage Ranch and took one photo every 60 seconds of the ISRA work and were very please in what we saw. The operations were very delicate and sensitive to the issues of keeping the dust at a minimum. What we were concerned about was the work should be stopped when the wind reaches 15 miles per hour as we personally observed a 20 mile an hour wind event and were surprised on how much dust was generated. It visually indicated a potential exposure to the surrounding communities as we saw it drift over the Chatsworth Formation into the San Fernando Valley.

A standard should be used by all three Responsible Parties (RP'S) as currently the National Aeronautics and Space Administration (NASA) has a sample first, demo later approach and The Boeing Co. has taken the approach of Demolition first and sample later. This leads to problems in identifying the source of the contamination as we saw in the Resource and Conservation Recovery Act (RCRA) Facility Investigation (RFI) Group 5 Building Documentation Logs. As a Nuclear Research Facility it should be assumed that every square inch of soil or debris could have the potential of Radiological Contamination and should be screened as such before demolition occurs.

Another issue that should be addressed in the SOP is the practice of leaving cargo overnight for several days on Woolsey Canyon, a Residential Community.



More signs to inform the public are in need to be installed as they were used in past operations, but not since 2007.



With Hundreds of Buildings removed at the SSFL over the past 50 years without any public or agency oversight we need to take extra care in the remainder as we do not want any more Cancer or other Health Related issues put forth on the Surrounding Communities. A big part in the reduction of potential Health Risks is informing the public so they have a choice to use these motorways on certain days or even they option of staying indoors when they know demolition and transportation of hazardous material is in progress.

The AREA I staging area near Former Building 357 draws another concern as The Boeing Co. is placing debris found from other areas of the site onto this asphalt covered area and then sampling for radioactivity. This is another example of demo first sample later and could risk the health of not only the employees, yet the surrounding area. This AREA should now be considered contaminated and should be remediated after the work is completed.



In Section 2.5 of the Standard Operating Procedures (SOP): Building Demolition Debris Characterization and Management for the Santa Susana Field Laboratory (SSFL) of February 24, 2010 (Recycling) is a concern as these metals could post a Radiological Hazard as well as the metal flakes of rust that could leave a trail in the communities during transport if not covered properly as we see in these photos.



This truck left the SSFL uncovered and was followed to a Recycling Plant near Oxnard California along the way passing several Agricultural Fields for Human Consumption.



In Section 3.1 of the Standard Operating Procedures (SOP): Building Demolition Debris Characterization and Management for the Santa Susana Field Laboratory (SSFL) of February 24, 2010, Historical Information needs to be investigated more as we saw in the Group 5 RFI Building Documentation Logs that dozens of documents were written in "Associated Chemicals - Unknown" a more in-depth investigation needs to occur.

In Section 4.0 of the Standard Operating Procedures (SOP): Building Demolition Debris Characterization and Management for the Santa Susana Field Laboratory (SSFL) of February 24, 2010 the Pre-Demolition Inspections need to include more photography and GPS locations of all the Sinks and Drain-lines to and from each building.

In Section 5.0 of the Standard Operating Procedures (SOP): Building Demolition Debris Characterization and Management for the Santa Susana Field Laboratory (SSFL) of February 24, 2010 the Pre-Demolition Planning needs to include Safety Courses for All Drivers as we see in the photo below, this driver, instead of slowing down to downshift around this corner, he maintained the vehicle speed in order to make the corner without a reduction in speed. This is a blind corner and could have caused a head-on collision.



In Section 6.1.2 of the Standard Operating Procedures (SOP): Building Demolition Debris Characterization and Management for the Santa Susana Field Laboratory (SSFL) of February 24, 2010 the rinsing of containers should be under extremely controlled conditions so that the runoff from this procedure be collected on a surface that will not impact the groundwater at the site. We must keep in mind that this site is the headwaters to the Los Angeles River and over 1700 acres of the 2850 acres of the SSFL drain into the river via Bell Creek.

During Demolition Activities the surrounding Open Space entities should be contacted for closure of their trails and camping during these times as in the past we had children hiking on Sage Ranch parkland during demolition days and a simple sign could have helped in this particular situation. The American Jewish University's Brandeis-Bardin Campus should be notified as well as all the neighbors in a two-miles radius as to when Demolition days are to occur.

In closing ACME would like you to consider as per Section 6.1.2 of the SOP that NO Concrete or Asphalt Recycling be done as many of the spills and accidents impacted these coverings and in many cases were re-paved or re-covered hiding contamination between layers. Please, No Concrete or Asphalt Recycling from the SSFL, period, Send it to a designated landfill for disposal.

Sincerely,

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cc: Tom Gallecher - The Boeing Co., Allen Elliott & Merrilee Fellows - NASA, Cal EPA Secretary Linda Adams, Gerard Abrams, Maziar Movassaghi, Rick Brausch & Susan Callery - DTSC, Billie Greer for Governor Arnold Schwarzenegger, Assemblymember Audra Strickland, Assemblymember Cameron Smyth, Louise Rischoff for Assemblymember Julia Brownley, Rebekah Rodriguez-Lynn for Senator Fran Pavley, Phyllis Winger for Los Angeles County Supervisor Greig Smith, Los Angeles County Supervisor Dennis Zine, Ventura County Supervisors Linda Parks and Peter Foy, Shelly Backlar - Friends of the Los Angeles River, Millie Jones for Los Angeles County Supervisor Michael Antonovich.

