

Mr. Mark Malinowski
Department of Toxic Substances Control (DTSC)



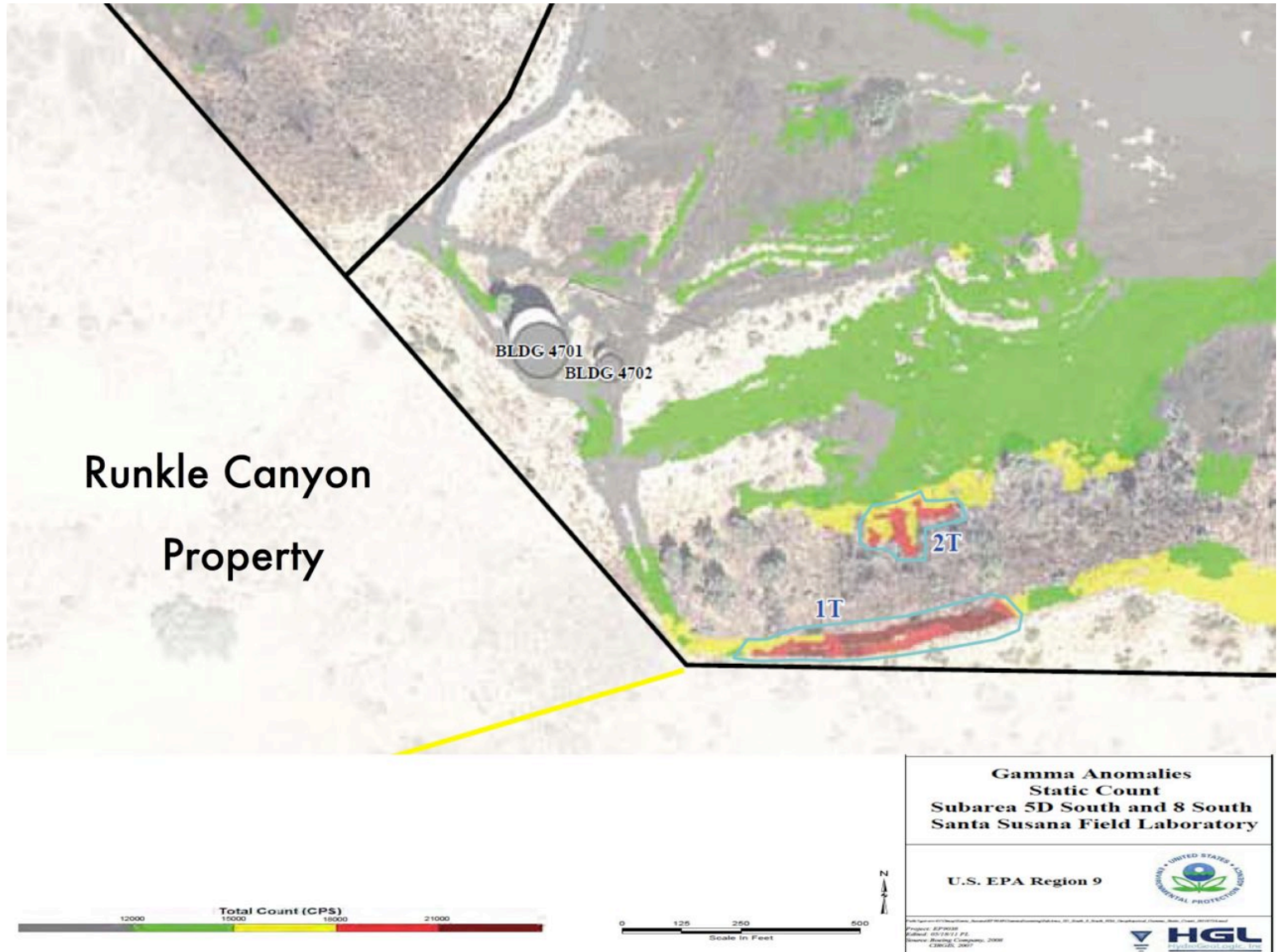
Dear Mr. Malinowski,

In reference to the below link, Buildings 4701 & 4702 – Water Tanks located within the AREA IV portion of the Santa Susana Field Laboratory (SSFL), DTSC should consider this a violation of the Administrative Order on Consent (AOC) and all actions should halt until there is further investigation by the Radiological Team of Region IX's Environmental Protection Agency (EPA)...

http://www.dtsc-ssfl.com/files/lib_rcra_soils/BuildingDemo/buildingdemolition/65711_WaterTank-DEMO.pdf

This should be treated as an operational area, as the document states "Wells were presumably used to fill the older of the two tanks" the only wells in AREA IV are contaminated with Radioactive Tritium, among other Compounds. Furthermore these tanks have pipelines that connected to the Radioactive Hot Lab (Building 4020), with unknown uses according to the original and the most recent Historical Site Assessments. The Boeing Co. did their own Radiological Scan and in violation of the AOC, did not use Background as a standard release, but rather Reg. Guide 1.86 that is well above the new background that was paid for with over \$38 million dollars of Obama Stimulus Monies. The document also allows shipping potentially radioactive metals out for recycling which goes against the 2007 Consent Order which the Boeing Co. is still bound to. This also appears to be in direct violation of the Conti Order and it doesn't appear that the tanks are coming down in order for EPA to take samples beneath them and there appears no independent radiation measurements is scheduled for the debris.

The adjacent area is under investigation of possible naturally occurring radiological or SSFL impacted soils. Until this area is understood, the proposed demo plan should cease.



Action is needed on this issue to Ensure a Proper Cleanup of the Santa Susana Field Laboratory, it's Related Facilities and their Surrounding Communities, as we do not want DTSC to create a precedent for dealing with AREA IV workplans that violate in place law.

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