



Laura Rainey, Senior Engineering Geologist

9/7/2010

California Department of Toxic Substances Control (DTSC) 5796 Corporate Avenue, Cypress, CA 90630-4732 (Via Electronic Mail)



ACME has provided the below comments for the Group 8 Resource Conservation and Recovery Act (RCRA) Facility Investigation Sampling and Analysis Plan (SAP) Report of the Santa Susana Field Laboratory (SSFL) AREA IV portion delivered to DTSC on June 14th, 2010 by The Boeing Co.

Dear Ms. Rainey,

ACME would like to see a consistency in the above referenced document 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 week past the Department of Energy (DOE) have 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 Public Notice regarding the Group 8 SAP should be resubmitted and a new deadline for comments be posted for the above reason as well as the link on your original Public Notice is incorrect and send the public to the link below, Page Not Found...

http://www.dtsc-ssfl.com/files/lib_rcra_soils/group_viii/sap/Group_8_SAP_2010.pdf

When in fact, the correct link is found below, notice the word "Revised" in link.

http://www.dtsc-ssfl.com/files/lib_rcra_soils/group_viii/sap/64666_Revised_Group_8_SAP_2010.pdf

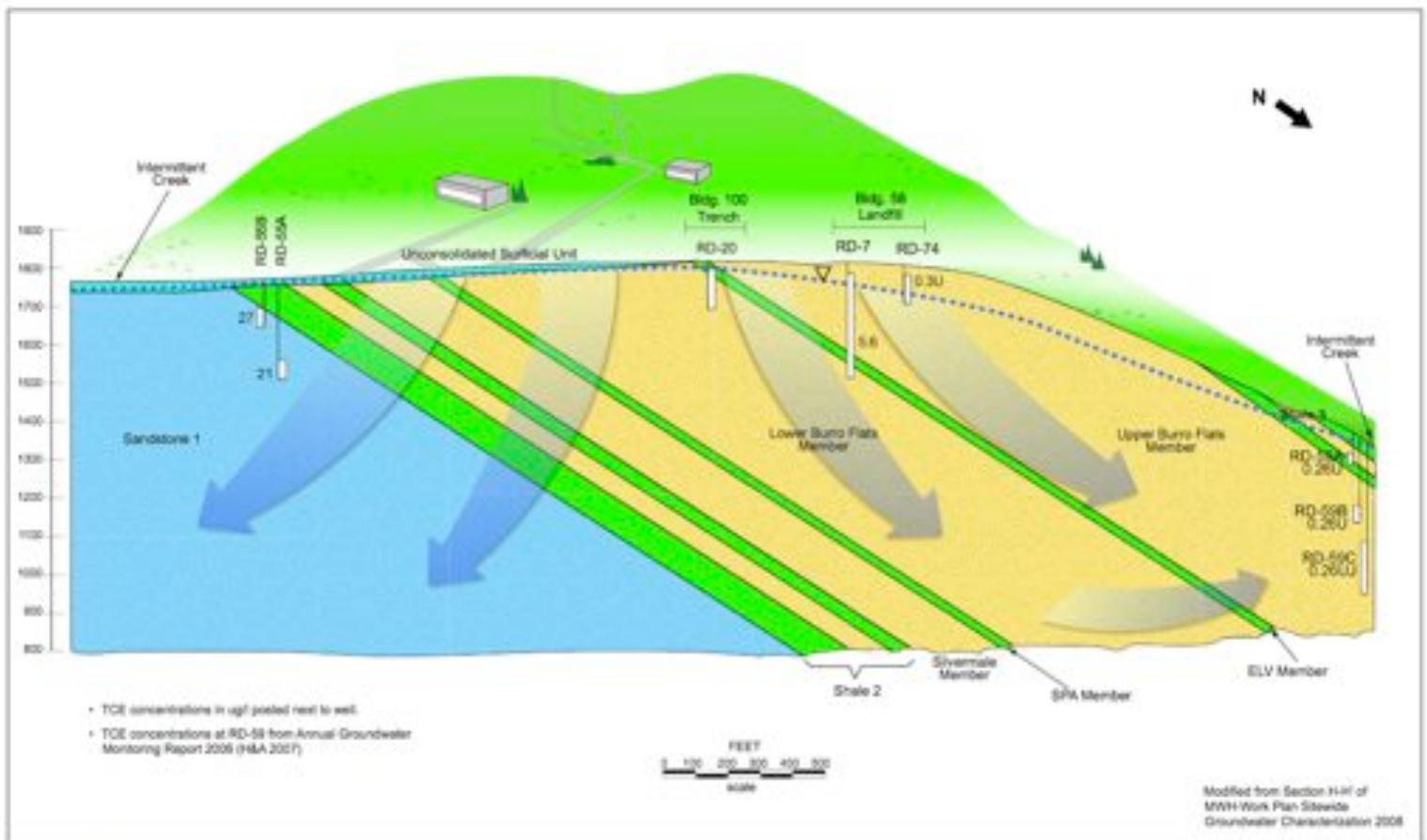
Please use the below link to download the Energy Technology Engineering Center (ETEC) AREA IV Chemical Usage Summary Report as it is a great companion document to the Group 8 SAP and should be posted on the DTSC as a related document.

http://www.h2ohno.com/images/Area_IV_Chem_Use_Summary_Report_Sept_1994_A4CM-AR-0005_.pdf

As per the September 3rd, 2010 DOE Agreement in Principle...

[http://www.acmela.org/images/FINAL DOE Agreement in Principle DTSC September 3 of 2010.pdf](http://www.acmela.org/images/FINAL_DOE_Agreement_in_Principle_DTSC_September_3_of_2010.pdf)

We are now straight to background. Risk Based Screening Levels (RBSLs) developed prior to SB990 becoming law require modification to properly determine where clean-up is necessary. Santowax-R (Mixed Terphenyls), a moderator for the Organic Moderator Reactor (OMR) should be considered a chemical of concern as it gathers other constituents to it. Santowax-R (Mixed Terphenyls) is used in building 009 according to the AREA IV Chem Use Summary Report of 1994 as seen on the page one link.



CDM

Santa Susana Field Laboratory Area IV
Ventura County, California

Figure 4-2
Groundwater Conceptual Site Model

Groundwater impacts and how they relate to the faults that are located within close proximity of outfall 7 at the Building 56 Landfill area. The basis of the theory that the VOCs contained in the groundwater below the site will remain immobilized due to being "caught up in the rock matrix" would explain this finding at depth, and further demonstrates the need for the subsurface impacts to be resolved. Proper acknowledgement of possible site-related activities contributing to this finding, considering the decades of astronomical discoveries of non-health protective practices is necessary to finally attain the appropriate remediation of this property.

In the recent Environmental Protection Agency Technical Background meeting there were Areas of Concern (AOC) regarding the ramp down to the "Million Dollar Hole" that showed "Hot Spots" from their Gamma Scanning.

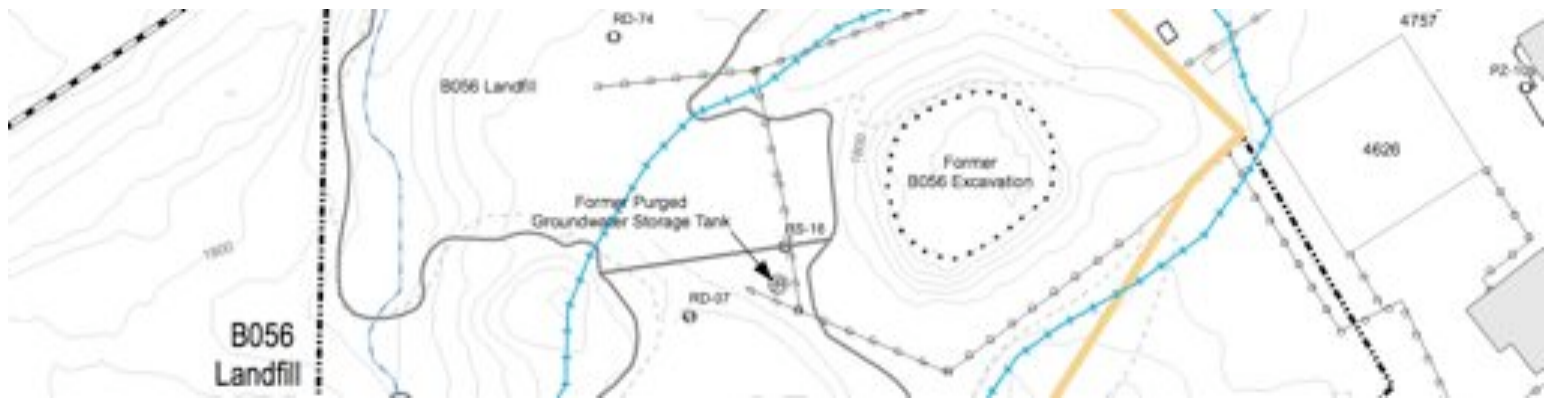
This Group 8 RFI SAP Report should also take into consideration of the missing fuel rod that was dropped from a helicopter in the 1960s for a penetration soil test. 20 fuel rods were dropped near the Empire State Atomic Development Authority (ESADA) area and only 19 were recovered.

5.9.13 ESADA Chemical Storage Yard

This area, approximately 100 feet by 150 feet, is located in the southwestern part of Area IV. It was used from 1960 through 1968 for sodium-water reaction tests conducted for the Empire State Atomic Development Associates (ESADA). It was later used for storage of fifty to one hundred 55-gal drums of Dowanol, an organic solvent used for cleaning sodium from components. Figure 8 shows an aerial view of the area while barrels were stored there. Ground-level photographs of the drums show markings indicating the contents: "LLTR/Used Dowanol/Water 6.3% (6.5% on some barrels)/ Na 17.0 g/l," "CHCF," "Used Dowanol," "Reusable Alcohol," and "Empty." ("LLTR" was the Large Leak Test Rig, a test installation in Building 059. "CHCF" is the Component Handling and Cleaning Facility.) The Dowanol had become saturated with sodium reaction compounds and was no longer effective for cleaning. The drums were removed in 1983.

Surface water samples should be taken in every area in the Group 8 reporting area, and the area seen below, where the Solar Concentrator was located should have the concrete drainage areas sampled as this area was highly classified and many of the documents related are scarce.





On page 44 of the AREA IV Chem Use Summary Report of 1994 it states in regards to the building 56 landfill excavation "Debris visible on surface around the pit and floating on the water" The debris that floats could be Antimony and aside from various health concerns, in some cases Antimony can be radioactive. We have heard several stories from former employees of Atomics International that there was a pit that was used to dump Sodium and it would "Bubble and Smoke for Days." Is the building 56 landfill excavation this pit? We need to have it drained, the water taken offsite for proper disposal and find out what is dumped in this pit. On page 44 of the AREA IV Chem Use Summary Report of 1994 it states in regards to the building 56 landfill excavation "There is water in the pit throughout the year without an external supply, indicating that it is groundwater" With all the offsite seeps and springs of groundwater discharges on and offsite of the SSFL, this is a large concern. The SSFL is at a higher elevation than the surrounding landowners and this potentially contaminated groundwater could be making it's way to Runkle Canyon and the American Jewish University's Brandeis-Bardin Campus.

Thank Ms. Rainey for taking the time to review and consider my comments for the Group 8 Resource Conservation Recovery Act Facility Sampling and Analysis Plan.

If there are any questions please call...310-428-5085

Sincerely,

William Preston Bowling

ACME - P.O. Box 1636, Topanga Canyon, California 90290

cc: Tom Gallecher & Kamara Sams - The Boeing Co., Stephanie Jennings & Bill Backous - DOE, Cal EPA Secretary Linda Adams, Maziar Movassaghi, Rick Brausch, Gerard Abrams, Mark Malinowaski & 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

Page FOUR - Final Page