



Doug Sheeks
Department of Toxic Substances Control (DTSC)

9/4/2012



Dear Mr. Sheeks,

Below are the ACME comments on the Draft Chemical Soil Background Study Report of the Santa Susana Field Laboratory (SSFL) prepared for the California Department of Toxic Substances Control - URS Project No. 29403635 dated July 27th of 2012.

One of the many, sources of contamination at the SSFL are Dioxins, as per science and the Los Angeles Regional Water Quality Control Board (RWQCB), whereas even before the 2005 Topanga Fire, the RWQCB issued violations against the Boeing Co. for discharges of elevated Dioxins through their National Pollutant Discharge Elimination System (NPDES) permit. There needs to be a clear Background number in the Dioxins category. As history will tell us, literally thousands of Rocket Engine tests "Blackened" the hillsides of the SSFL and were washed away with chemicals resulting in tainted stormwater runoff, majority of which was discharged into the Los Angeles River.

There are several other areas that noted Geologist Thomas Dibblee would call "The Chatsworth Formation" that can be used as another Chemical Background Reference Area. To use only one area, about 4 miles west of the SSFL is not representative of a Background Study. As we are developing the United States Environmental Protection Agency's (EPA) Radiological Background it has been noted some unexplained levels of Strontium 90 and Cesium 137 that became airborne from thermal treatment or Burning in Open Pits.

These activities produce Dioxins, and in some cases could spread in the same way the radionuclides were. In the recent EPA Historical Site Assessment, one former worker testimony claims "We would burn when the wind was blowing to the cows and not back on us" Translation: When the wind was blowing to the west onto Runkle Ranch, the AREA IV Sodium Disposal Facility or "Burn-Pit" would operate. This poses a problem in the discovery of a True background for chemicals, mainly Dioxins if you are using the Lang Ranch/Bridal Path areas as your sole source.

The fact that the department did not mirror the EPA locations and take from the Chatsworth Formations in both the west and the eastern off-site portions of the Santa Susana Field Lab should be revisited.

Please confirm these comments will be entered into the record.

Thank you in advance for your time.

William Preston Bowling
Founder/Director ACME
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