



Dear EPA,

Please consider these ACME comments on the Draft Final Technical Memorandum Deep Borehole Soil Sample Results, AREA IV Radiological Study, Santa Susana Field Laboratory (SSFL), Ventura County, California - EPA Contract Number: EP-S7-05-05-Task Order No. 0038 Prepared for EPA by Hydrogeologic, Inc. September 7 of 2012.

In the case of Building 4073 (Above Photo), this building was demolished down to the lower underground level and then backfilled with the rubble. Now that it is known and documented in the EPA Historical Site Assessment, the rubble should be removed and then Deep Borehole Sampling should be conducted in these trenches.

With the amount and random areas that Strontium 90 and Cesium 137 are found, the chemical form and their daughter products should be documented and the information used in the Department of Toxic

Substances Control co-located data-gap for chemicals in AREA IV of the SSFL. When we are finding Strontium 90 and Cesium 137 in separate for in random inaccessible areas, there is a possibility they are from air dispersion of the Former Sodium Disposal Facility Building 4886, as they would burn the filters from the radiological exhaust systems and science will tell you, that Strontium 90 and Cesium 137 are commonly found side by side, unless thermally treated or burned – Building 4886 was also known as the AREA IV Burn Pit.

There should be more deep borehole sampling as the surface gamma scanning can only reach certain depths. The fact that only 18 deep borehole samples were collected from the entire AREA IV is not representative. I would like to see 18 at each radiological facility and random boreholes throughout



The fact that only 8 deep borehole samples were collected at the Sodium Reactor Experiment SRE (Site of the United States worst Nuclear Accident) is only a portion of what was needed. As seen by the above photo, the SRE did in fact impact the underneath soils and possibly the groundwater.

In Sample ID 70322, in the location of the former Shield Test and Irradiation Reactor (STIR) or Building 4028, there was a 25-foot deep borehole sample of PU-239-240 that was One to Ten times the Radiological Trigger Level. This area needs more boreholes to find out how deep the radiological contamination extends and if it impacts the groundwater at the site as many of the residents of Simi Valley are drinking blended groundwater.

Thank you in advance for the consideration of these comments. The Community looks forward to a continuing relationship with EPA to Ensure a Proper Cleanup of the Santa Susana Field Laboratory, it's Related Facilities and their Surrounding Communities.

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