

United States Environmental Protection Agency Region IX (EPA)
Mary Aycock

8/16/2012



Dear EPA,

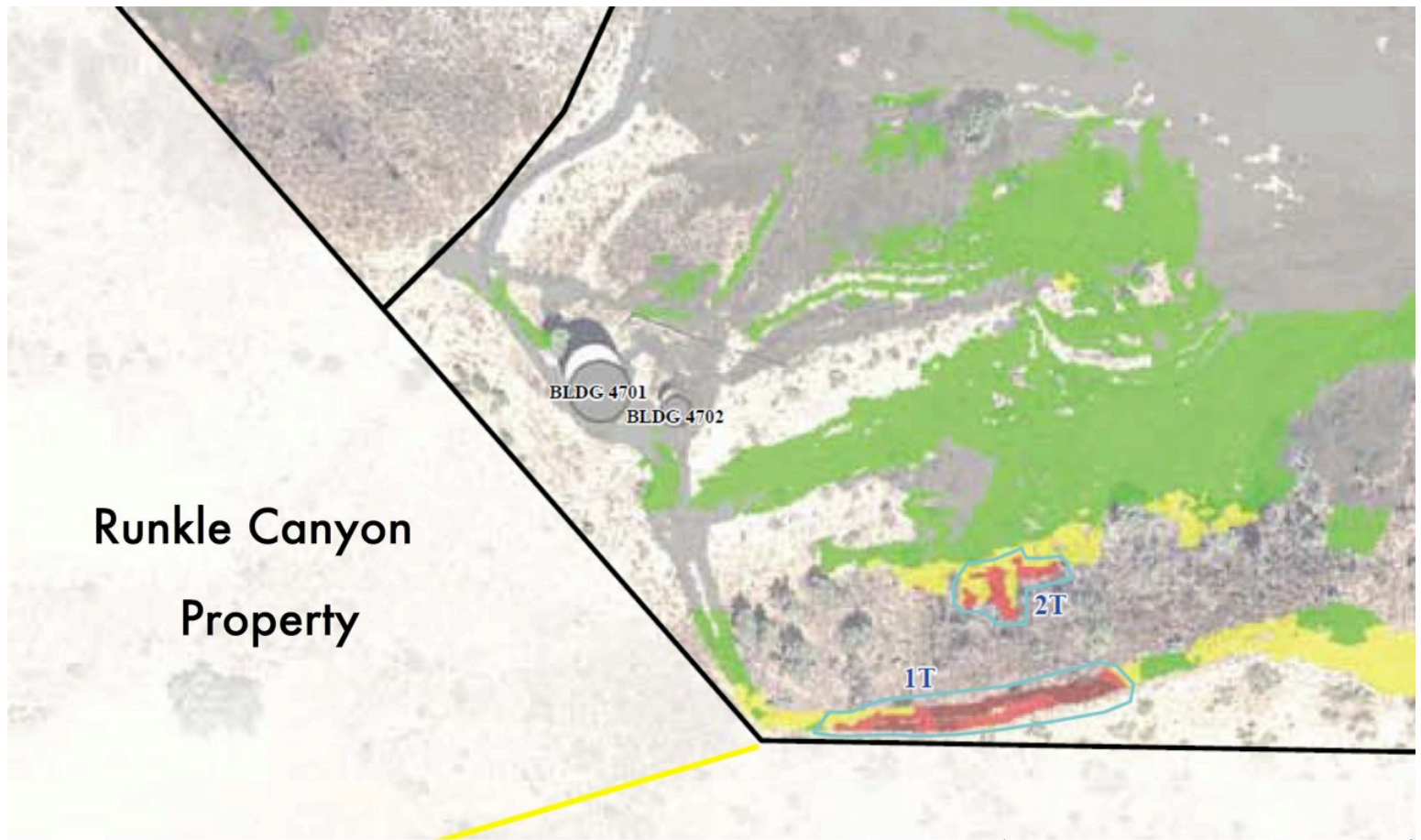
Please consider these ACME comments on the Draft Final Gamma Radiation Scanning Report, AREA IV Radiological Study, Santa Susana Field Laboratory, Ventura County, California – EPA Contract Number: EP-S7-05-05–Task Order No. 0038 Prepared for EPA by Hydrogeologic, Inc. July 27 of 2012.



In Section 4.1, Amendments, Page 4-2, why was complex modeling of GRAYs with the MicroShield Software not utilized? These areas need to be noted and revisited as we need to understand if these are true GRAYs or not.

On page 4-3, it states that the TMGS and STGS were not used to Re-Scan GRAYs because of Budget, yet the whole part of this study is to find out what we do not know about the SSFL. It quotes “The MMGS data was deemed sufficient” who made that decision? It certainly was done without stakeholder input or comment.

In Section 4.2, Deviations, Page 4-4, it quotes “The Ergs II failed three QC checks but was used to collect data while the cause of failure was corrected” please give the stakeholders the locations that the ERGS II scanned during this outage. This should also be listed in Section 5.0 as well.

In Section 6.3.2, Inaccessible Surfaces, Page 6-6 reads “Other inaccessible surfaces included temporary features which should be scanned at a future date upon removal” There needs to be an exact list of what these areas are. As of right now it is listed very vague, such as “Pipes” & “Heavy Equipment”, this document needs to pinpoint these locations as they will be needed when removal occurs in the future.



Gamma Anomalies Static Count Subarea 5D South and 8 South Santa Susana Field Laboratory	
U.S. EPA Region 9	
	

Project: EPA/909
Edition: 01/18/11, P.1
Version: Static Countmap, 2009
CRCLD, 2007

The above Gamma Scanning efforts need to step out onto the Runkle Canyon property as the over 21000 counts per second of Gamma does not stop at the property line.

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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