

The Boeing Company
Santa Susana Field Laboratory
5800 Woolsey Canyon Road
Canoga Park, CA 91304-1148

February 22, 2010
In reply refer to SHEA-109623

Ms. Christina Walsh
Mr. William Bowling
Aerospace Cancer Museum of Education
23350 Lake Manor Drive
Chatsworth, California 91311

RE: Dust Generation during Demolition Activities in 2009
Santa Susana Field Laboratory, Ventura County, California

Dear Ms. Walsh and Mr. Bowling:

The Santa Susana team would like to thank you for coming to us and sharing your concerns related to dust generated at the site last year. Your open and candid discussion furthers the relationship that Boeing wants to foster with you and all members of the public related to ongoing closure activities. After you provided the time lapse photographs in a video format, I asked our remediation, demolition, health & safety, and environmental protection teams to review the information in order to better ascertain the events that occurred which generated the dust noted in the video and determine if the controls in place were adequate. As you might expect, any activity, whether it involves earth moving operations or simple maintenance activities, may generate dust. We want to ensure that the processes we have in place are adequate to protect the health of our employees and contractors as well as meeting applicable environmental requirements. Below is a summary of our review.

Approximate Dates of Dust Observations

Our first step was to ascertain what events took place during the dates in question as noted in the video. The dates recorded on the photos did not seem to correlate with activities underway in the subject area (see Attachment 1, pages 1 and 2). For example, Building 31-492 (the trailer structure in the video behind Building 436) was installed on September 30, 2009, and Buildings 408 and 301 are not present in the photos. Demolition of these buildings began June 22, 2009, and demobilization of demolition equipment began August 21, 2009. Secondly, the time stamp appeared off based on the sunrise and sunset times in June.

Please note that these observations were not intended to refute the fact that dust was present, it was only to assist us in determining what events were taking place. After reviewing the dates, times, and features present in the video, we believe the dates in question were October 22 through October 27, 2009. Using the October dates as the reference point, we reviewed our files to determine what activities were occurring in these areas. We concluded that the primary source of dust came from the Building 407 Parking Lot Refurbishment project described below. To a much lesser extent, dust is also seen on the right side of the video from exposed soil from the Building 408 location and road base removal activities west of the Building 408 area.



Building 407 Parking Lot Refurbishment (left side of video)

The project was at Building 407 (behind and to the left of Building 436) and generated the majority of the dust. Building 407 had historically been used for hardware and equipment storage and had not been used for several years. In 2009, it was designated to be reactivated to support closure activities; therefore, the parking lot and roadway needed to be revitalized. Boeing decided to repair the area with slurry coat instead of placing new asphalt.

Since the area had not been used for many years, the build up of dust, dirt, debris, and loose asphalt was considerable. Brooms, a mobile vacuum sweeper with filters, and portable blowers (high powered blowers mounted on push carts) were used to create a clean, dry surface so that the slurry mixture would adhere properly to the underlying pad. Slurry coat is oil based and does not cure properly when contacted with water. In addition, the use of water in this instance would have created mud and surface water runoff issues.

Storage containers and other equipment were removed October 22, area sweeping occurred October 23 and 26 - 27, and the slurry seal was applied during the later part of the week (see Attachment 1, pages 3 and 4). The waste bins associated with this project were sampled and, based on the laboratory results, disposed of as non-hazardous waste.

Source of Dust Generation

The portable blowers are the dust source since the mobile vacuum sweeper had filters. Using the vacuum sweeper to the maximum extent practicable was an effective dust control method as it minimized the amount of dust generated. The portable blowers were necessary due to the residual fine/granular dirt in the cracks and crevasses which is very difficult to remove.

Dust Event on a Sunday

The middle two days of the video appears to be a weekend as there was no ongoing activity and no vehicles in the parking lot. Weather records for our area (www.wunderground.com) recorded wind gusts up to 29 mph on Sunday, October 25 (the trees and plastic covering in the foreground are blowing in the wind). Wind gusts were responsible for dust generation on this day -- not ongoing operations. Water trucks were not onsite this weekend.

In conclusion, we take seriously our responsibility to minimize and control dust emissions generated by remediation or demolition activities. Each project is independently evaluated by our remediation, demolition, health & safety, and environmental protection teams for environmental impact and mitigation measures are implemented, as necessary. Based on our analysis and review of the applicable standards, we've concluded that appropriate controls were used to minimize the generation of dust from this project.

Thank you for sharing your video and photos with us. Requiring our teams to review these projects has heightened our awareness of the need to control dust emissions irrespective of the source and gave us an opportunity to re-evaluate contractor performance in accordance with health & safety plans and field plans.

Going forward, we have carefully considered your idea for conducting time lapse photography during certain types of field activities. You will be pleased to know that we have decided to test time lapse photography on the 2010 ISRA field program. After the



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completion of field activities this year, we will post the photographs on our website and will solicit feedback from you and the general community.

I trust this analysis and response adequately responds to the concern you raised. Thank you again for bringing this to our attention directly and we hope that by continuing to work together we can clarify and resolve issues that may come up in the future.

Very truly yours,



A handwritten signature in black ink that reads 'Tom'.

Tom Gallacher
Director, Santa Susana Field Laboratory
Environment, Health and Safety

AJL:bjc
Enclosure

cc: Mr. Rick Brausch, DTSC
Mr. Gerard Abrams, DTSC