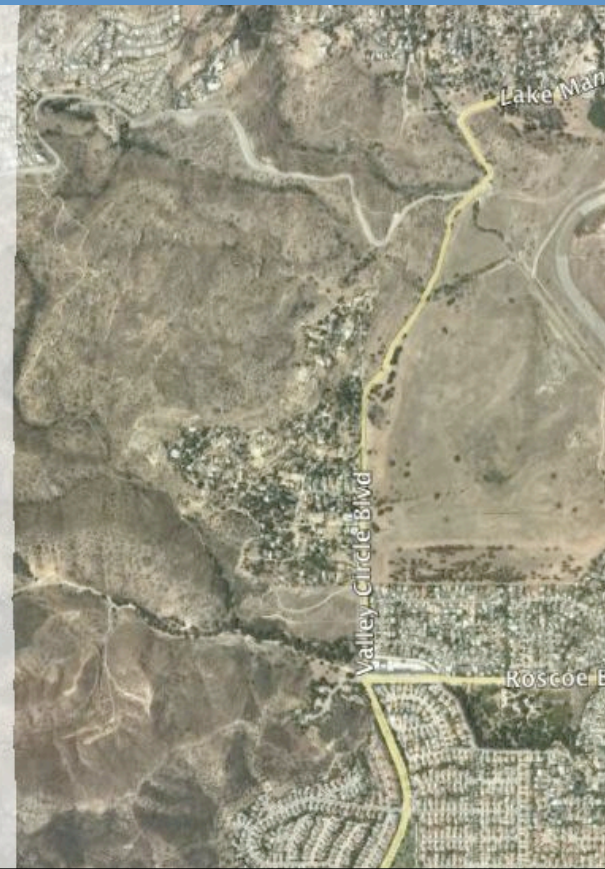
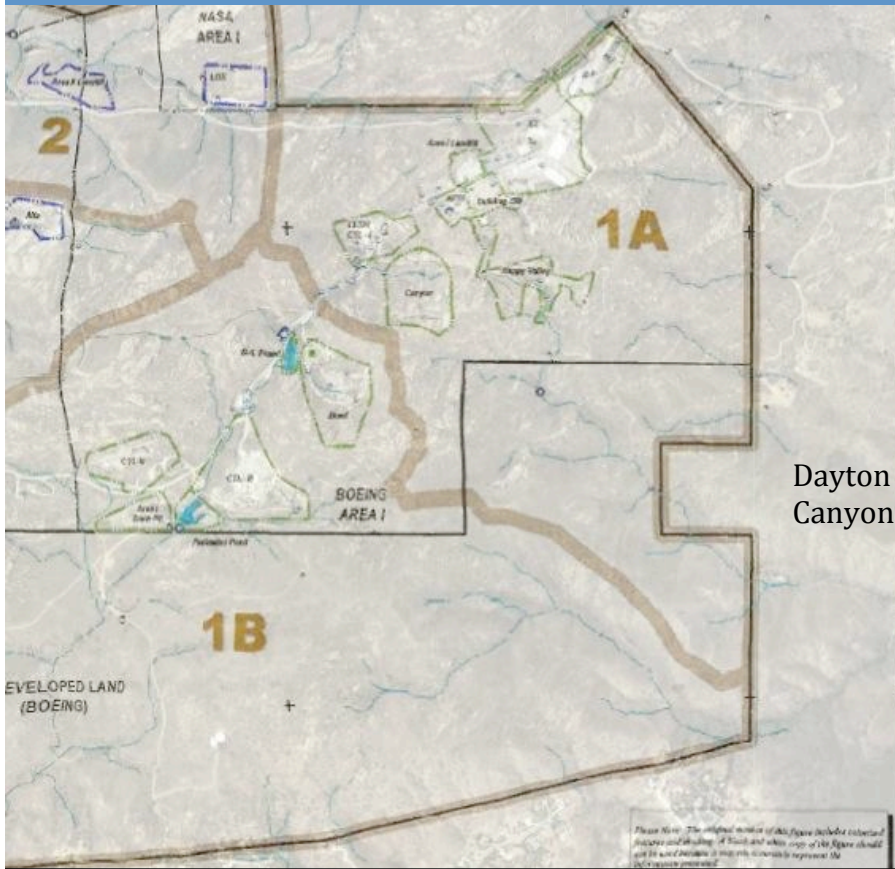


# Dayton Canyon Centex Homes Project NFA



cleanuprocketdyne.org  
ACMELA.ORG

William Preston Bowling and Christina Walsh  
ACME Aerospace Cancer Museum of Education

Request to implement a mechanism to monitor for contaminants of concern  
at the Dayton Canyon/Centex development to comply with the conditional  
decision for No Further Action.

Aerospace Cancer Museum of Education  
23350 Lake Manor Drive  
Chatsworth, CA 91311 818.712.6903

November 6, 2008

Los Angeles City Council  
200 North Spring Street  
Los Angeles, CA 90012

Dear Honorable Members of the Los Angeles City Council,

We write to you today to express concerns about the recent decision for No Further Action [NFA] for Dayton Canyon Centex Homes development proposed at Roscoe and Valley Circle Boulevards in West Hills, California. Being that the districts are divided by Roscoe Boulevard and the development encompasses acreage on both sides of Roscoe, we believe this proposed development falls under both district 12 and 3 (Smith and Zine respectively).

First, we would like to emphasize that no determination of "clean" has been made on this property by the recent review, as no (relatively little) information has since been analyzed with regard to the absence of perchlorate in the sampling event that occurred just post rain in 2006. Since astronomical findings (not just one, but more than thirty detections), that ranged far beyond current recommended health standards as high as 62,000,000 ppb (11 million times the current EPA standard), it is inappropriate to move forward with this development, without prudent analysis of all constituents of potential concern (COPCs), which should be sampled for on a regular basis.

During early meetings with the public, we were reassured that ongoing sampling was indeed appropriate for continued monitoring, especially in light of the astronomical findings of perchlorate. It is also important to emphasize that perchlorate was not the only contaminant of concern that was found, nor did it disappear – it went downstream. There was also cesium and strontium found, both being fission by-products of the nuclear work that went on at the site.

In recent discussions with DTSC, we were told that continued monitoring is handled by the LA Regional Water Quality Control Boards NPDES permit with Boeing as the Discharger. In reviewing first quarter sampling for the NPDES stormwater discharges, we found that the sampling events, that took place at Outfall 8 (located upgradient from the Dayton Canyon development), were marked as "ANR" indicating "analysis not required." This is important because these were the **only** rain events that occurred since the singular clean finding in 2006. This underscores the jurisdictional gaps that exist between regulation in stormwater and surficial soils, where impacts from activities at the Santa Susana Field Laboratory might be missed. This includes the Dayton Canyon property as it is directly down-gradient from the Happy Valley portion of the SSFL site.

We rely on these regulations to protect us and insure that no further harm will come from the chemical and radiological impacts of this highly contaminated

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site [SSFL] and disposal practices of nearly fifty years that included burning radioactive waste under the cover of nightfall. You can be assured that the aerial dispersion of these toxins did NOT stop at the SSFL property boundary.

We ask that specific and regular monitoring of soil and surface waters be implemented for all constituents of potential concern (COPCs) related to the operations of the Santa Susana Field Laboratory, to allow for public confidence in the development process that is occurring at Dayton Canyon without a proper or current EIR.<sup>1</sup>

Just seven days after the issuance of the NFA decision by DTSC on October 10<sup>th</sup>, it was discovered through the "offsite assessment of disturbed soils" that the area located just above Dayton Canyon did indicate disturbed soils and road access on the 1960s. In addition to recent findings of more than a thousand igniters (used with perchlorate and other exotic

chemicals), which were discovered, buried in a creek-bed at Sage Ranch during the clean-up of the Northern Drainage which was inspired by our original finding of an asbestos, PaH, and antimony dump in the creek-bed just downstream.

This tells us that we must consider the conditional decision very carefully as these recent examples further demonstrate offsite risks to human health and clean water.

While the conditions included in the

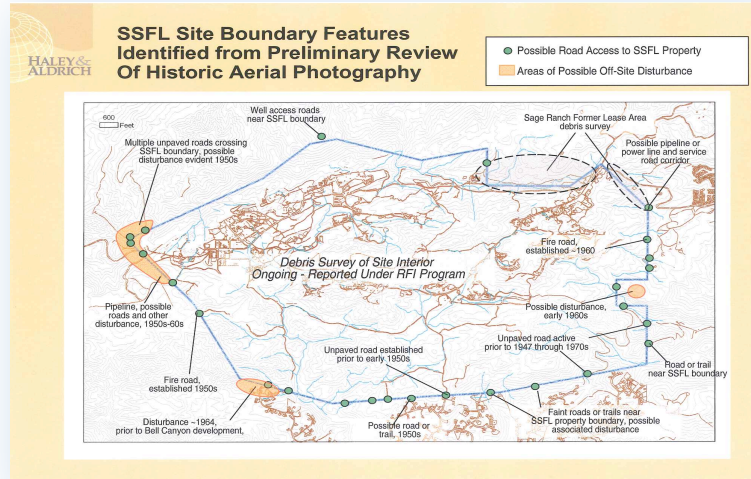


Figure 1 showing many areas of disturbed soils and access roads around the SSFL site.

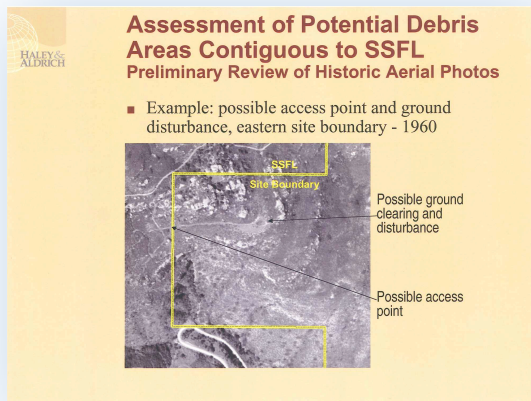


Figure 1 showing close-up of disturbed soils just upstream from the Dayton Canyon property, and a road showing access to the area.

<sup>1</sup> So much more is known about the impacts of the site since the presentation of the insufficient EIR issued on the Dayton Canyon property in the 1990s.

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NFA decision also discussed the igniter finding at Sage Ranch and the expectation that anything found in the future should trigger further investigation, there is no mechanism for finding contaminants in the future built into the process. We feel this is an important step in the process of protection of public health that is being completely missed, and we respectfully ask for your guidance and assurance in providing protection to the current residents in the area as well as potential future residents of the site through the development of monitoring guidelines for each rain-event for at least 5 rainy seasons to insure that the non-detects are indeed the habit and not the anomaly.

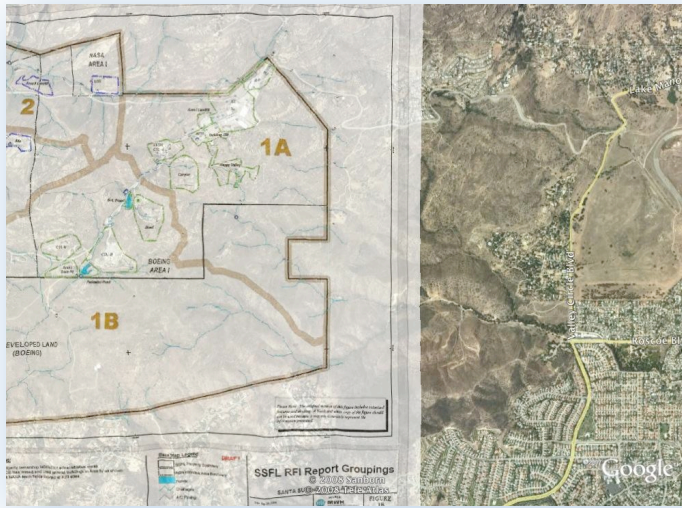


Figure 3 showing proximity to Dayton Canyon from the Santa Susana Field Laboratory.

Even more recently, during a radiation survey of the Area 1 Burnpit, radium was found at levels ten times background, which have not been adequately explained. Firstly, this is an area that has already undergone an interim-measure clean-up. In addition, it was only found because of the recent radiological scanning procedure written and implemented by the Department of

Public Health. Without such procedures closely followed, such as scanning the area at a speed no greater than 1-2 feet per second, these areas of buried debris would not have been discovered.

We also need to remember that radium is also a breakdown decay product of uranium and HEU (Highly Enriched Uranium) processing and handling did go on at the SSFL site. Radium is a million times more radioactive than uranium mass of the same weight. Since it is chemically similar to calcium, it goes to the bone and causes cancer, which has been documented through the tragic look into the Radium Dial Worker tragedy<sup>2</sup>. This is especially important when understanding that the radiological clean-up is led by the Department of Energy (who is also responsible for the contamination itself), and they still claim that their responsibilities stop at the property line of Area 4 (DOE's operational portion of the site). It is clear from these continued discoveries that the radiological impacts, for which they are responsible for, went beyond those borders and

<sup>2</sup> Deadly Glow, The Radium Dial Worker Tragedy, Ross Mullner, PhD, MPH that "The radium dial painters' agony alerted the world to the hazards of internal radiation. They were the first victims of the wanton use of radioactive substances to alert the public to this new danger on the frontiers of science. ..." Tony Bale, 1987

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therefore, their characterization must holistically include all possible areas of operation and impact which includes Area 1 as well as possibly Dayton Canyon in this case.

The Area 1 Burnpit may have an exposure pathway to the Dayton Canyon development as well, through the Burro Flats Fault, which transects the property leading from the field lab down to the Chatsworth Reservoir and should therefore also be considered in this review.

Thank you for your attention to this matter. We hope to answer any questions the Council may have on behalf of the City of Los Angeles regarding the concerns we have on this development and the overall clean-up. Decisions are currently being made with regard to its impacts on the community today, and throughout the clean-up and characterization process. We appreciate your consideration and participation in this important process to protect future generations from impacts of our past, and look forward to your position on these unaddressed impacts very soon.

Sincerely,

Christina Walsh  
Cleanuprocketdyne.org  
ACME Aerospace Cancer Museum  
of Education  
Founder/Co-Founder

William Preston Bowling  
ACME Aerospace Cancer Museum  
of Education  
Founder

Cc: Norm Riley, Department of Toxic Substances Control