

RESPONSE TO QUESTIONS FROM SHELDON PLOTKIN SUBSEQUENT TO THE MARCH 2004 SSFL WORKGROUP MEETING

1. It was stated that NPDES surface water discharge monitoring from the Happy Valley area had not detected any perchlorate moving offsite in January, February, and March. It is our understanding there were no measurements made in January or March, and only 1 or 2 made in late February.

We have checked our records for both 2003 and 2004. For 2003, four sampling events took place at both Happy Valley 1 and Happy Valley 2; one on February 12, one on February 25, one on March 15, and one on May 3. Perchlorate was detected in the Happy Valley 1 location at 4.7, 1.2, and 5.3 ppb on February 12, 25, March 15, 2003, respectively. Perchlorate was detected at the Happy Valley 2 location at 4.6 ppb on May 3, 2003.

For 2004, our records show one sampling event on February 26, 2004, in which perchlorate was not detected at Happy Valley locations 1 and 2.

If you need more information on this, please contact Mr. Peter Bailey of my staff at 916-255-3602.

2. It was stated that upon spiking of the Raytheon groundwater sample that had been initially found to contain perchlorate, two peaks appeared, indicating that the original peak thought to be perchlorate had been something else. It is our understanding that after spiking, there was still only 1 peak and that your Hazardous Materials Lab questions the decision by the lab to change the original designation to a "non-detect" and is reviewing the matter.

Fred Seto, of DTSC's Hazardous Materials Laboratory, received data from the Lab used by Raytheon, on April 28. The Lab has been reviewing the matter and is expected to share their conclusions by the middle of June.

3. In response to an inquiry about whether wells in the western part of LA County near the site were being investigated for perchlorate, DTSC said that the LA Regional Water Quality Control Board now has responsibility for offsite perchlorate investigations (with the exception of Brandeis) and the inquiry should be directed to it. However, in a December 10, 2003 letter to Christina Walsh of Cleanuprocketdyne.org and the West Hills Property Owners Association, requesting study of wells in the West Hills area, the Regional Board staff said that investigating perchlorate in the areas surrounding SSFL was outside their jurisdiction and that the requested "study and the oversight of these types of activities would be handled by the lead agency, DTSC. Please coordinate with DTSC staff for split sampling and testing events." So, DTSC tells people to contact the Regional Board and the Regional Board tells people to contact DTSC regarding the offsite wells. This matter needs clarification.

It has been brought to our attention that there is confusion in the community regarding which state agency is responsible for perchlorate investigation. The quote by the Regional Water Board that you refer to is in response to Ms. Walsh's comment, "...we feel that the West Hills side of the property should be tested with more detail." We believe that the Regional Board's response, "The study you are requesting ... would be handled by the lead agency, DTSC." is accurate if it responds to Ms. Walsh's request for further study of the West Hills side of the property, presumably the SSFL property. Ms. Walsh later expresses concern of the "surrounding area" but it is not clear to us if she is requesting further study of the SSFL property or if she is requesting residential properties in West Hills to be studied.

Ms. Walsh did request to DTSC at the last Workgroup meeting to be involved in testing events onsite, and we have been working with her and other people to

THE MARSH 1000 ZEPHYRUS MEETING

The meeting was held on Monday, February 23, 1982, at the Marsh 1000 Zephyrus Club. The meeting was held in the evening and was attended by approximately 100 people. The meeting was held in the evening and was attended by approximately 100 people.

We have checked the records for both 1981 and 1982. For 1981, the sampling system took place at both Happy Valley 1 and Happy Valley 2, one on February 15 and on February 22, 1981. For 1982, the sampling system was checked at Happy Valley 1 location on February 15, 22, and 29, 1982. For 1982, the sampling system was checked at the Happy Valley 2 location on February 15, 22, and 29, 1982.

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coordinate that request. We are the lead agency for characterization activities onsite, including testing for perchlorate, and the Regional Board is the lead agency for perchlorate investigation occurring outside the boundaries of SSFL. (DTSC has taken the lead for testing surrounding the bathtub well on the Brandeis property, as you noted.) We can see that the comment and response were both vague, which can easily lead to misunderstandings. In our presentations to the public (via Workgroups meetings and fact sheets) we will make a point of being clear about the difference in our agencies' roles.

4. Lastly, and most troubling, was Mr. Abrams' attack on Mr. Hirsch near the end of the last meeting. Mr. Hirsch had said that the Regional Board had identified perchlorate in the surface runoff leaving the property at the NDPEs discharge points that drain into Dayton Canyon Creek, while DTSC had taken soil samples from the creekbed area for Dayton Canyon Creek and said it had not found detectable perchlorate. Mr. Hirsch's point was that we know perchlorate went down Dayton Canyon Creek in surface water discharges, yet perchlorate was non-detect in sediments in Dayton Canyon Creek, raising questions about the usefulness of sediment measurements in determining whether perchlorate may have previously passed down in surface water.

Mr. Abrams has every right to have a different view of the significance of these two data sets and whether they call into question his presumptions about the implications of non-detects in sediment. However, that is a very different matter than saying, as he said, that DTSC was unaware of any such data existing, implying that Mr. Hirsch was lying about the data. The non-detects in sediment in Dayton Creek referred to by Mr. Hirsch had been samples taken by Mr. Abrams himself. The audience clearly came away with the impression that Mr. Abrams, on behalf of the Department, was saying no such non-detects in Dayton Creek sediment existed, that Mr. Hirsch was inventing them — when in fact, these were measurements Mr. Abrams himself had made.

It is our understanding that after the meeting concluded, Professor Tabidian came over and spoke to Mr. Abrams and several other Department staff, expressing puzzlement that Mr. Abrams would deny existence of measurements he had personally taken. As we understand it, Mr. Abrams conceded that in fact the data did exist. However, by that time the damage had been done, as he had clearly created the opposite impression with the audience.

If Mr. Abrams did not mean to create such an impression, he should apologize and correct the situation. If he did intend to imply no such measurements existed, when he had taken them himself, the Department needs to apologize and remedy the situation. This really isn't appropriate conduct, and doesn't help. People have every right to disagree about the interpretation or significance of data, but it goes a bit over the edge to deny that data exist and imply that another speaker has invented measurements that in fact one oneself conducted. We think an apology is in order.

I personally asked Gerard Abrams about soil samples from the creek bed area from Dayton Creek. Gerard told me that no soil samples have been taken by DTSC beyond the SSFL property in lower Happy Valley Drainage or from Dayton Creek due to access restrictions. If you or Dan you have any sampling results from that location, I would be interested in giving them to my staff for their review.

The amount of information that exists regarding this site can be overwhelming to the general audience member. Our intention is to be clear to everyone about the data that exists and how we intend to proceed with that data. If we feel there has been a mischaracterization about where or what data has been found, we feel obligated to state clearly where we believe the inaccuracies lie. We do not believe that pointing out these differences implies that another person is necessarily lying or being deceitful.

