

April 1, 2017

Ms. Stephanie Jennings
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US Department of Energy
4100 Guardian St Suite 160 Simi Valley, CA 93063

Re DOE EIS Area IV and Northern Buffer Zone
Santa Susana Field Laboratory

Thank you for the opportunity for the CAG to comment on your SSFL Environment Impact Statement. The document is well researched, develops alternatives with their benefits and consequences, and allows for the future selection of a cleanup method.

The CAG supports the Conservation of Resources alternative, which satisfies the National Contingency Plan, The California Health Act, NEPA and the US EPA guidelines, and includes development of alternatives, the use of risk assessment and area averaging. The existing AOC agreement between DOE and DTSC does not satisfy any of these laws and regulations and needs to be rewritten. This alternate would accurately identify those areas for remediation that present threats to human health, and would result in less excavation, backfill, pollution and truck traffic. The amount of truck traffic and pollution are the selection criteria for an alternate since they are the primary concerns of the surrounding communities. Backfill would be readily available.

The No Action alternative should not be considered. This site is leased by DOE from Boeing, and if DOE does not clean up the site that action would not support Boeing's commitment to clean their property to an EPA standard of suburban residential for ultimate use as open space.

The existing AOC contains directions for a severely flawed process and should not be selected for implementation. This contractual agreement contains a list of chemicals that are to be removed from the DOE site that was compiled from unknown sources, and directs cleanup to background or detect. The document does not have any consideration of end use, human health, toxicity or health threats, and it does not comply with any of the federal and state laws and regulations governing such cleanups. Furthermore it requires point-by-point sampling for 132 substances with extraordinarily low values that almost guarantee rejection and the requirement for removal of massive amounts of soil. The backfill must meet the same values as the cleanup, and to date no backfill soil has been found that meets those criteria.

The Revised LUT Values alternative accounts for toxicity, end use of the site and threats to human health. It reduces the number of substances that would trigger rejection of soil by approximately 80 percent, with corresponding reductions of excavation, backfill, trucks and pollution. However this alternate uses point-by-point sampling, and does not reduce the excavation as much as the Conservation of Natural Resources. This alternate is our second choice.

The choice for Groundwater Remediation should be Monitored Natural Attenuation,. The bedrock is holding the contamination in place with the exception of several plumes that are being monitored, pumped and treated. The groundwater is not used for drinking water.

The EIS does include an air-sampling program that will monitor the site when work is under way, but for the community, the CAG recommends that the sampling include health risks such as Valley Fever and diesel fine particulates.

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