

## **The Santa Susanna Field Lab Cleanup in a Nutshell**

In the past, three Native American groups occupied the Ventura County area surrounding the Simi Hills: the Chumash, the Tongva and the Tataviam and all were seminomadic. Many artifacts and caves with pictographs remain which show evidence of habitation.

After World War II, various companies leased and later purchased 2,850 acres of land in the Simi Hills, between the San Fernando Valley and the Simi Valley. The property was used for testing liquid fuel rocket engines for virtually every major missile defense and space program in the US and also for the development and testing of nuclear, solar and other alternative energy sources. At present, all of these activities have ceased.

During this period of work at the site, the soil and groundwater were contaminated with chemicals and radioactive elements. Since then, building demolition and interim cleanup were started while the extent of contamination was being determined and final cleanup plans were being developed and approved.

In 2007, Boeing, DOE and NASA signed an agreement called a “consent order” with the California Department of Toxic Substances Control (DTSC) to clean up to suburban residential standards set by the US EPA. Although the final land use was to be a park, this cleanup would go far beyond the lesser “park” standards.

In 2010 NASA and DOE signed separate agreements with DTSC called the Administrative Orders on Consent (AOCs) requiring them to clean up soil to radiological and chemical levels seen in areas untouched by humans, “background levels” or to the lowest detectable levels, “minimum detection limits.” These requirements go far beyond any US EPA method and would be implemented without any consideration of risk or ultimate land use.

The two agreements are two fundamentally different cleanup methods. The first is the US EPA procedure, which is risk-based, included in Boeing’s 2007 consent agreement and is being followed by them, DOE and NASA for groundwater. Using this procedure, the ultimate use of the property is determined, in this case a park, and the site will be cleaned up to the point where there is no risk to humans visiting the park or the environment in the park.

The second method, “cleanup to background or detect”, is required in the 2010 AOC agreements for NASA and DOE with DTSC. The AOC calls for removing any soil containing chemicals or radionuclides above the naturally occurring levels, or removing any manmade chemicals until none can be detected.

The CAG supports the US EPA process because it decreases the risks associated with the cleanup itself; minimizes the amount of soil to be excavated, removed and replaced; and is least disruptive to the environment and the cultural history of the site.

The cleanup to “background or detect” will require approximately eight times more soil to be excavated, will extend for a decade or more, and will bring more trucks through our communities compared to what is standard for ultimate use as a park. Further, the implementation of the AOC, as being proposed, will remove the historical rocket engine test stands, Native American sites and artifacts, and will severely damage the environment. All of this will cost approximately ten times more than the typical, standard US EPA process for a park.

In summary, the controversy lies between the established cleanup method developed by the US EPA versus the cleanup to “background or detect” which is not a procedure used in the US for such large properties as the SSFL. The consequences of the use of this unproven cleanup method are unacceptable to the surrounding communities as well as all who value the SSFL environment, culture and history.