

**The DOE EIS Cleanup at the Santa Susana Field Lab     March 29, 2017**

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In 2010, under political pressure and without any technical review, the Department of Energy (DOE) signed an Administrative Order of Consent (AOC), an agreement with the Department of Toxic Substances Control (DTSC) for the cleanup of the DOE site at the SSFL.

The AOC calls for the removal/ excavation of any soil that contains one or more of 132 chemicals or nuclides at a level above background or above detection levels.

The AOC does not consider risk to human health, and each of the 132 chemicals or nuclides are given equal importance for removal.

DOE estimates to implement the AOC that 933,000 cu.yds. of soil would be removed by 70,000 truckloads round trip, over a 12 year period at a cost of \$468 million.

Backfill would require 45,636 truckloads, round trip.

DOE cannot find any backfill that meets the standard clean to background levels or detect.

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DOE engineers, applying human risk factors, found that approximately 80% of the 132 chemicals and nuclides or 102 do not pose a risk to humans.

In addition to the AOC, DOE developed alternates in order to comply with the National Environmental Policy Act, which requires the examination of reasonable alternates and the use of risk assessment.

The recommended alternate removes only the chemicals/ nuclides that are a risk to human health and it is called Conservation of Natural Resources. This cleanup is equal in safety compared to the original AOC and it follows US EPA guidelines.

For this alternate, DOE estimates the removal of 148,000 cu. yds. by 11,100 truckloads round trip, over a four year period at a cost of \$124 million. Backfill would require 7,200 truckloads round trip and backfill soil is readily available.

You are going to hear that is only a partial cleanup – yes, this alternate removes the harmful substances and leaves behind the harmless substances and it provides for natural attenuation of low concentration, petroleum contaminated soil.

Why should you care?

The excavation and disturbance of soil creates fugitive dust particles. Large particles can settle on the ground and in the upper lungs of humans, and fine particles, which can remain in the air for weeks, can settle in the lower lungs causing respiratory illnesses and Valley Fever.

Diesel fumes produce fine particles and exposure to these can lead to respiratory problems, cardiovascular disease, lung cancer and perhaps Alzheimer's disease.

The Southern California Association of Governments says that diesel exhaust is the number one pollution problem greater than auto exhaust, and for the whole cleanup; DOE, NASA and Boeing will be using diesel trucks and diesel excavation equipment.

It is everyone's interest for DOE to minimize the excavation, the number of trucks and the air pollution.

Please support the "DOE Conservation of Natural Resources" cleanup and ask your representatives for a risk based US EPA cleanup. Encourage NASA to revisit its AOC and develop cleanup alternates as required by federal law.