



Interagency Agreement frames studies Page 3



Energy Technology Engineering Center
Area IV, Santa Susana Field Laboratory

CleanUpdate

December 2008



Other EIS studies underway Page 2

Greetings to Santa Susana Community

In keeping with our commitment to keep you informed of our progress toward cleaning up Area IV of the Santa Susana Field Laboratory (SSFL), we would like to provide you with this update. We will provide updates periodically and welcome your comments and suggestions for future CleanUpdate editions.

We want to thank all who dedicated time and thought to the *Draft Gap Analysis Report* and submitted comments during the scoping period for the *Environmental Impact Statement (EIS) for Remediation of Area IV of the Santa Susana Field Laboratory*. We firmly believe that our success will depend on how well we are able to engage the community in the process of determining how to proceed with cleanup. We look forward to working in partnership with the U.S. Environmental Protection Agency (USEPA) and the entire SSFL community as we undertake the studies that will provide the foundation for the environmental analyses that will be presented in the SSFL Area IV EIS. (See text box, page 3, for further information on the studies.)

Specifically, we sincerely appreciate all who:

- attended meetings
- read our documents
- offered comments (both in writing and in person)

- sent e-mails to friends and colleagues
- announced our meetings on alternate websites
- otherwise encouraged folks to participate in the EIS process.

Our special thanks go to those of you who attended every single meeting we have hosted in the past eleven months. We have benefited from your participation and willingness to speak out.

We hope you will continue to be involved. With that said, we would like to update you on our recent accomplishments at SSFL.

Stephie Jennings, DOE NEPA Document Manager

Thomas Johnson, DOE Federal Project Director

Have email? Get connected!

DOE encourages those who would like to receive the **CleanUpdate** and other SSFL news by email to send your address to: ETEC-Energy@emcbc.doe.gov

DOE developing responses to comments

DOE will respond to each comment received from over 80 individuals from the two data gap meetings in June, the six scoping meetings in July 2008 and formal letters and emails. Both comment periods closed in August 2008.

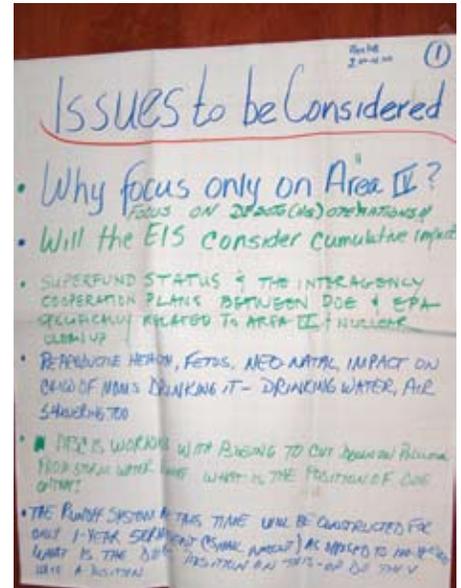
Due to overlapping content and timing, DOE will respond to both sets of comments in a combined Comment Response Document that we hope to complete by the end of this year. The Comment Response Document will be available on the ETEC website, on CD, and in hard copy. Those who commented will receive the document by mail. Others interested in receiving the document will be sent a copy upon request. (See the end of this Update for contact information.)



Stakeholders at a Northridge, California, scoping meeting had full opportunity to discuss a wide range of technical topics with EIS subject matter experts and DOE staff before and after the formal comment portion of the meeting. Meetings were held in an open house format that included formal comment sessions recorded by a court reporter. Two meetings per day during afternoon and evening hours were held at Simi Valley, Northridge and Sacramento, California on July 22, 23 and 24, 2008.

Other EIS studies underway

DOE has begun preparations for cultural and biological work on Area IV to comply with the National Historic Preservation Act and the Endangered Species Act (respectively). Both will address requirements in the National Environmental Policy Act. The SSFL is located in the southeast corner of Ventura County, California, bordering the San Fernando Valley of greater Los Angeles.



DOE received more than 800 comments during scoping, some on flip charts during the scoping meetings (as shown above), some by email, and some by regular mail. All will be considered in planning for studies to be conducted for the Risk Assessments and Environmental Impact Statement.



DOE held six scoping meetings in connection with the SSFL Area IV EIS. Norm Riley of DTSC (seated, center left), Stephanie Jennings, DOE (center), Thomas Johnson, DOE (center, right), and others, participate in discussions on EIS issues and alternatives during a scoping meeting held in Sacramento on July 24, 2008.

Interagency Agreement frames studies

In late July, the Department of Energy (DOE) and USEPA entered into an Interagency Agreement for USEPA to conduct a comprehensive radiological study of Area IV as directed by Congress. As part of the interagency agreement, DOE has given USEPA \$1.5 million out of DOE's Fiscal Year 2008 budget to conduct the background study. USEPA is developing a funding estimate, scope, and schedule for the Area IV radiological site characterization study. A copy of the Interagency Agreement is available at http://www.etc.energy.gov/Health-and-Safety/EPA_Rad_Survey.html.



Gregg Dempsey (center, left), with the USEPA Office of Radiation and Indoor Environment, works with stakeholders to identify sampling locations for the radiological background study. Background concentrations are levels of radionuclides in the soil that are naturally occurring or the result of global fallout. The background study's findings will be used for comparison with other data collected to evaluate potential radiological contamination in Area IV. At left, Christina Walsh, founder and director of cleanuprocketdyne.org, reviews notes, and William Bowling (at right), co-founder of the Aerospace Cancer Museum of Education, observes as Mr. Dempsey speaks with members of the EPA Background Workgroup.

The *Draft Gap Analysis Report* will be revised after completion of these studies

Radiological Background Study

Under USEPA leadership, a study is being conducted to determine the background (naturally occurring and global fallout) levels of radiation for the area surrounding the SSFL, which will provide a basis for comparison.

USEPA is working with the State of California's Department of Toxic Substances Control (DTSC) and DOE to identify criteria for sampling sites for the radiological background study. USEPA will also determine radiological detection limits, that is, at what concentrations specific radionuclides can be detected.

Preliminary criteria for selecting sites for measuring background radiation are that they must be very similar to SSFL (same geological formations as the site) and similarly not affected by road traffic impacts and other human activities. USEPA is getting advice for the background study from the Background Workgroup, comprised of SSFL stakeholders and DTSC, Boeing, and DOE staff. (See related photo in this Update.)

Radiological Site Characterization Study

USEPA will identify locations and levels of radionuclides in Area IV surface soil, seeps, surface water, and groundwater.

Chemical Background Study

DTSC will direct a study to determine the background levels of metals, dioxins, and other chemicals for the area surrounding the SSFL and provide a basis for comparison.

Chemical Site Characterization

Under a consent order with DTSC that guides implementation of the Resource Conservation and Recovery Act (RCRA), a team composed of DOE, Boeing, and NASA will identify locations and levels of chemical contaminants on the entire SSFL site. This work is being carried out as RCRA facility investigations.

DOE currently plans to use the findings from all four of these studies to revise the *Draft Gap Analysis Report*, identify additional data needs, collect data, and conduct health and environmental risk assessments consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The results will be used to prepare the EIS and analyze alternatives for the cleanup of Area IV.

DOE sends letter to EPA regarding Superfund Listing for SSFL

In December 2007, USEPA completed a Hazards Ranking Assessment (HRA) for SSFL and consequently concluded that the entire SSFL site is eligible for placement on the National Priorities List (NPL). Placement on the NPL is the first step in conducting cleanup under the Superfund program. In accordance with its standard procedures for making listing decisions, USEPA shared the results of the HRA with the State of California and requested a formal written response. The State has requested additional time to evaluate the potential NPL listing. Normally USEPA does not become involved in a site cleanup until the site has been placed on the NPL.

CONTINUED ON PAGE 4

DOE noted that many members of the community who provided comments during scoping for the EIS:

- Would prefer to see radiological investigation and clean up across the entire SSFL (not just Area IV)
- Would like the USEPA to have a role in overseeing site radiological investigation and cleanup.

On October 10, 2008, DOE sent a letter to USEPA to document support for a comprehensive cleanup at SSFL and for inclusion of the site on the NPL utilizing its standard listing process. The rationale for this letter was based on the following:

- Listing of the entire SSFL would allow for a coordinated, comprehensive cleanup addressing the entire Santa Susana Field Laboratory. DOE believes a site-wide approach would allow for the most thorough, efficient, cost-effective, and protective strategy for radiological investigation and cleanup.
- Placement of the site on the NPL would allow USEPA oversight authority for radiological investigation and cleanup activities across all of SSFL. DOE would no longer be a self-regulating entity for radiological investigation and cleanup at SSFL.

- USEPA has the experience and expertise for oversight, approval, and enforcement authority over DOE's radiological investigations and cleanup, which will be necessary for accomplishing a cleanup that will be protective of human health and the environment.
- DOE has extensive experience and a nation-wide track record of successful cleanup efforts focused on radiological and hazardous contamination under the auspices of the Superfund program. Multiple-party agreements typically provide for shared implementation and fiscal responsibilities among federal and state partners with the resultant fiscal responsibilities borne by DOE, NASA, and Boeing.

The letter can be reviewed at <http://www.etec.energy.gov>

DOE will continue to work cooperatively with DTSC on the Consent Order for the investigation and remediation of chemical contamination even under placement on the NPL.

For more information

<http://www.etec.energy.gov/EIS/EIS.html>
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