

\*From:\* Christina Walsh [<mailto:cwalsh@cleanuprocketdyne.org>]  
\*Sent:\* Monday, April 09, 2007 6:22 PM  
\*To:\* Energy Technology Engineering Center  
\*Subject:\* cleanuprocketdyne.org comments on Building 4024 Decontamination and Decommissioning Engineering evaluation and Cost Analysis (EE/CA)

Decontamination and decommissioning has different meanings to different people. In the document provided on the DOE website, which ironically dated february, though it was NOT made available to the public at that time, it shows a pristine photograph of the 4024 in 1962. The photograph shows new and pristine buildings and is not the current condition of that building nor the surrounding area. In fact, if you were to look at this building today, you would find "bone yards" all around of what you call "environmental decontamination," by leaving contaminated debri to degrade in the weather. It is this current condition of Building 4024 and the surrounding area that needs to be evaluated. How is this possible when you aren't even willing to show the public what this place really looks like today. I was also born in 1962, and you might imagine that a picture of me in that year would not give you very much information about how I need to be dealt with today. The same is true for Building 4024. If you zoom into these high resolution photographs you will notice the around of fenced in debri,(2/07\_dsc6480.jpg) in one case, it looks like the contents of several offices just sitting out in the weather (2/07\_dsc6490.jpg). Please review the number of debri piles and bins that are filled and potentially being carted away without oversight in each of these photographs taken earlier this year. Photographs and documents are available for download and review at [http://www.cleanuprocketdyne.org/documents/DOE4024\\_040907.index.htm](http://www.cleanuprocketdyne.org/documents/DOE4024_040907.index.htm)

1. Accelerated clean up is not in the best interest of the public because it does not properly characterize the problem that we are faced with today: How to clean up the many decades of contamination and all before Bush leaves office? One of the most troublesome slides in the presentation shown by Mr. Rutherford at the last meeting is on page 23 of the EECA presentation [http://apps.em.doe.gov/etec/library/SNAPEECA/SNAP-Environmental-Test-Facility-\(SETF\)-Building-Final.pdf](http://apps.em.doe.gov/etec/library/SNAPEECA/SNAP-Environmental-Test-Facility-(SETF)-Building-Final.pdf) <http://apps.em.doe.gov/etec/library/SNAPEECA/SNAP-Environmental-Test-Facility-%28SETF%29-Building-Final.pdf> where it indicates in the legend, that green represents the areas where "facility clean up complete." I submit the following photographs to illustrate the current practice of leaving contaminated debri all around the facility to "cool off" in the environment which, as we all know, means the contamination washes and blows away over time. Well, where do you think it goes when it leaves the facility at the top of this hill where people live below on all sides?
2. EE/CA would permit cleanup levels up to 10,000 higher than CERCLA and public health considerations would normally allow. This is

inappropriate for several reasons. The first of which is that by using suburban residential as the land use scenario, rather than rural residential (current zoning), cleanup levels 100 times more lax than appropriate. Current zoning is RA-5; agricultural uses are found right around the site: 1. There is even an organic fruit farm near the top of Dayton

Canyon, just below the property line to the site in addition to an existing goat farm. 2. Sage Ranch, where we heard the boyscouts camping over easter

weekend. This is also an area filled with known contamination from the Santa Susana Field Lab which total disregard to its impact on the surrounding natural habitat that is one of the few remaining corridors for this wildlife.

3. Orcutt Ranch, where community fruit and vegetable gardens are within two miles of the site

4. Dayton Canyon - a mysterious death of a young man who had a thousand times the normal level of uranium in his body. This is a case that is currently being investigated by the

LA County Coroner. This case is not resolved and cannot be ignored as a basis of possible current contamination of the surrounding public health on a very acute level. Since he worked over the years as a contractor for SSFL cutting roads and such with his tractor, it is highly likely that his demise came due to exposure at this uncontained site.

3. You must cleanup the site to the maximum protective level, and by knowingly leaving contaminated waste to degrade in the wind and rain at the top of a hill only protects the hill, not the people below. We are tired of paying the price with loss of life in the communities because the DOE cannot be bothered to take on the most protective measures in both operations and remediation activities. Instead, the focus is on minimizing the cost to to the polluter. We at [cleanuprocketdyne.org](http://cleanuprocketdyne.org) believe that the polluter should be focusing on minimizing the cost in human and animal life of the surrounding communities. DOE was paid for the activities at the SSFL and it is your duty to the american people, including those people who live directly below this site. CERCLA also states that cleanup levels must be as close to 10<sup>-6</sup> as feasible and in the presentation, it was clear that they are using a factor of 100 fold on relaxation of cleanup.

1. Broken promises and putting houses and children atop the site of multiple nuclear accidents and of chemical spills is not the answer and the community will never accept this,

4. Proposing to ship radioactively contaminated waste to Kettleman Hills is not appropriate and also shows a total disregard for what happens next. Shipping radioactively contaminated waste to a facility that is not designed or intended to handle such waste

puts undue burden on yet another community because of the short-sighted financial goals of the DOE and Boeing and the community will not accept this sort of irresponsible behavior on the part of the military industrial complex up on the hill they call the SSFL.

5. In order to be able to properly comment on the demolition of a radioactively contaminated vault showing contamination penetrating the 9 foot thick walls, those clean up details should be provided, but instead, are being hidden until the comment period is over when we no longer have an opportunity to affect the outcome. By refusing to permit EPA to do an independent site characterization to find the contamination that needs to be cleaned up, we are left with being shown a picture from 1962. This goes against previous promises made and is crucial and necessary for effective cleanup. The EE/CA itself  
violates EPA guidance on EE/CA's; instead it is a "streamlined" version.
6. A recent finding of a projectile currently under investigation by DTSC found on the adjacent Brandeis property that is believed to be a former munition possibly fired off the SSFL. In addition, Mr. Bowling submitted as evidence of this activity a photograph he found on a German website about rocket enthusiasts that shows this activity. This platform used to fire possible missile ordinances toward Simi Valley is shocking, especially since any knowledge of such activity was denied by Mr. Brennglass of Brandeis even though there is also evidence of a previous finding which prompted legal action on the part of Brandeis. Clearly these activities have not been disclosed by the DOE or Boeing and more investigation is necessary and illustrates that we cannot afford accelerated characterization, especially when no extraordinary measures are being pursued to protect the public during this process.
7. Proposing unrestricted release for residential use of this land is unsafe. We heard from Dr. Yoram Cohen of UCLA that there are areas that cannot ever be cleaned up, such as the effect on groundwater in the area by the tritium plume because tritiated water cannot be cleaned because it becomes the water. 8. The fact that Boeing, DOE  
and DTSC are working on different things  
and not working together also assures that the best possible solution will not be even looked for. By segmenting the clean up, doing minimal documentation for each segment and no real look at the whole picture, it will be impossible to see the whole picture and the people below will pay the price. Is that fair, considering that using higher standards is certainly possible. Why not actually  
strive to do your best?

Please listen to the community and protect the community because they should not be paying for your activities. It is not right, and it is possible for you to do the right thing.

Sincerely,

Christina Walsh  
Executive Director  
[cleanuprocketdyne.org](http://cleanuprocketdyne.org)  
8463 Melba Avenue  
West Hills, CA 91304  
1.74 miles from SSFL as the crow flies

\*From:\* Christina Walsh [<mailto:cwalsh@cleanuprocketdyne.org>]  
\*Sent:\* Tuesday, April 10, 2007 9:08 AM  
\*To:\* Energy Technology Engineering Center  
\*Subject:\* 4024 comments

I submitted my comments yesterday but noticed that the link to the photographs had a typo. It is actually  
[http://www.cleanuprocketdyne.org/documents/DOE4024\\_040907/index.htm](http://www.cleanuprocketdyne.org/documents/DOE4024_040907/index.htm)

Since the pictures were too large to email, they take time to appear, but then can be downloaded for your examination and review.

Thank you,  
Christina Walsh