

SSFL CEQA Comments
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

Re: Comments on Draft Program Environmental Impact Report and
Draft Program Management Plan for Cleanup of the Santa Susana Field Laboratory

To Whom It May Concern:

Consumer Watchdog hereby submits comments on inadequacies in the Draft Program Environmental Impact Report (PEIR) and Draft Program Management Plan (PMP) for cleanup of the Santa Susana Field Laboratory (SSFL).

Background

SSFL is one of the most contaminated sites in the state, with extensive radioactive and toxic chemical pollution from decades of poor environmental practices. The site housed ten nuclear reactors, of which at least four suffered accidents, one of which was a partial meltdown. Numerous other nuclear facilities existed at the site as well, with a long history of releases. Included on a DVD provided separately by mail as an addition to these comments is a report prepared by the Committee to Bridge the Gap, along with its sources, which include extensive information on the history of contamination at SSFL and prior environmental analysis of the site as well as on the matter of demolition of contaminated structures and disposal of associated debris.

In 2010, DTSC entered into legally binding Administrative Orders on Consent (AOCs) with the Department of Energy (DOE) regarding cleanup of all of Area IV and the Northern Buffer Zone and with NASA regarding cleanup of all of Area II and the portion of Area I controlled by NASA. The central requirement of the AOCs is the cleanup of all soils to background (“Cleanup to Background Levels’ means removal of soils contaminated above local background levels.”)¹ The DOE AOC requires for “Disposal of Contaminated Soils: Soils contaminated with radioactive contaminants above local background to licensed low-level radioactive waste (LLRW) disposal site or an authorized LLRW disposal

¹ §1.8.2 and §1.7.2 of DOE and NASA AOCs respectively

facility at a DOE site.”²

The AOCs³ define “soils” as follows:

“Soils” shall mean saturated and unsaturated soil, sediment, and weathered bedrock, *debris, structures, and other anthropogenic materials*. “Soils” does not include surface water, groundwater, air, or biota.

emphasis added

Thus, the AOCs covers all structures (e.g., buildings), debris from demolishing them, and any other human-made materials; they must all be cleaned up to local background; and everything with radioactivity above local background must be disposed of in a licensed low-level radioactive waste disposal site or authorized LLRW disposal facility at a DOE site.” Furthermore, the AOCs cover all of the nuclear area (Area IV).⁴

Remarkably, after citing the above definition of soils from the AOCs, which, as we see, includes debris, structures, and other anthropogenic materials, the PMP (p. 12) asserts “soils do not include buildings, structures or other above ground infrastructure slated to be removed by DOE or NASA as part of their demolition activities.” No basis whatsoever is given for the assertion, which directly contradicts the actual language in the AOCs. Soils means “debris, structures, and other anthropogenic materials,” the AOC says explicitly. No exception, no carve-out. Yet DTSC now asserts that the opposite is true, that it does not include buildings or structures. The assertion flies in the face of the AOC language itself.

A few years ago, however, it was learned that Boeing was requesting and receiving approvals from DTSC to demolish buildings in Area IV containing radioactivity above background and to send the resulting debris to regular recyclers and to landfills not licensed for LLRW disposal. DTSC was approving these demolitions and disposals using a 1970s-era document, Regulatory Guide 1.86, which permits levels of radiation that far exceed the required background level mandated in the AOC. The reliance on Regulatory Guide 1.86 levels as a “clearance” threshold permits materials containing radiation levels above background to be disposed at sites that are not licensed to receive LLRW.

Consumer Watchdog and other groups filed a lawsuit. The Sacramento Superior Court issued a preliminary injunction, finding a likelihood of a CEQA violation by DTSC for failing to perform an EIR or other CEQA review of the demolition of structures and resulting debris disposal. That injunction remains in force pending final ruling by the court.

DTSC has now issued a Program EIR for the cleanup of SSFL. However, it pointedly asserts it is not required to and will not, with some very limited exceptions, consider any impacts of the demolition of structures (whether owned by Boeing or DOE) in Area IV and resulting recycling

² DOE AOC, Appendix B, p. 3

³ §1.8.4 and §1.7.4 of DOE and NASA AOCs respectively

⁴ DOE AOC §1.2

or disposal of wastes with radioactivity above background in places not licensed to dispose of LLRW.

The arguments DTSC has been making about Boeing structures it now extends to DOE's. It is stated in the PEIR (e.g., p. 3-12) that DTSC has essentially no regulatory authority over almost any of the buildings at SSFL, and even goes so far as to claim that the Ventura County Building Department is lead agency for issues related to demolition of the buildings. However, Ventura has no authority over hazardous or radioactive cleanups or waste disposal. Indeed, Ventura has repeatedly so stated and Boeing repeatedly so informed the County (see attachments hereto, obtained from the Ventura County Department of Building and Safety).

The PEIR is supposed to cover all aspects of the cleanup. By artificially carving out a key portion of the cleanup, one that is directly included in the AOC definition of what must be cleaned to background and disposed of in a licensed LLRW site, thus artificially omits from consideration a central set of environmental risks associated with cleanup decisions. For example, there is no consideration in the PEIR of the environmental risks attendant with radioactive waste being sent to metal recyclers or other recyclers and being recycled into consumer products, with resulting direct radiation exposures. Nor is there any consideration of the environmental impacts of sending radioactive waste to landfills that are not licensed LLRW sites and thus designed to minimize leakage and migration of radioactivity and which have the required closure plans and monitoring. The disposal of materials containing levels of radioactivity above background is a foreseeable consequence of the actions described in the PEIR and therefore the environmental impacts of those actions must be analyzed. Nor are any alternatives to these actions considered (e.g., compliance with the AOC requirements.)

The PEIR falsely asserts that the building contaminated demolition and disposal is not part of the site cleanup and is outside DTSC's discretionary authority and thus the environmental impacts of those cleanup activities will not be evaluated in the PEIR. It says it has "elected" to include an enhanced description of those activities, but it does not perform an evaluation of the environmental impacts of them nor examine alternatives. Furthermore, that description contains none of the information essential—no discussion of the radiological contamination levels, or which radionuclides, or whether on metals, concrete, asphalt that may be recycled and produce more exposures. Fundamentally, although CEQA requires an environmental review of the radiologically contaminated building demolition and disposal, including environmental impacts, alternatives, and mitigations, DTSC continues to refuse to comply with CEQA with regards to these environmentally critical activities. DTSC continues to violate CEQA at its core.

The PEIR on p. 3-69 provides that materials from buildings not "authorized" to have had radioactive wastes would be treated differently than from buildings that were so authorized. This is an artificial distinction which violates the AOC. Vague language in the PEIR here suggests that these buildings would be "certified" to be "free of radiological impacts." As set forth in the report on the separately submitted DVD, data from structures previously reviewed by DTSC that were purportedly "nonradiological" reveals that these structures contained contamination above background levels. Moreover, the AOC standard requires actual measurements, and to not have radiological concentrations above background. This vague language suggests the AOC is proposed to be broken.

The next sentence demonstrates indeed the breaching of the AOC. Whereas building debris above background must go to a licensed LLRW disposal site or an authorized LLRW disposal facility at a DOE site, the PEIR says that for buildings where it was known that radioactive activities occurred, the contaminated debris will not have to go to an LLRW site if the building contamination levels were below those in DOE 458.1 (essentially the same levels as Regulatory Guide 1.86). But the AOC was precise about this; contamination levels above **background** required the use of an LLRW site. The PEIR thus essentially announces the abrogation of the AOC. Furthermore, there is no environmental impact analysis of the impacts from letting this contaminated go to places not licensed or designed for it. (The reference to the Governor's moratorium is misleading; it does not allow the disposal of contaminated waste at Class I landfills. Indeed, LLRW waste is barred from such landfills.)

Thus, buried in the PEIR is the bold breach of the AOCs, and no consideration of the environmental impacts thereof, nor of alternatives. Letting contaminated material be recycled, so people get directly exposed, allowing contaminated materials to be dumped in places other than those licensed for LLRW, none of this is examined.

The PEIR and PMP repeat DTSC's indefensible claim that Boeing can do essentially whatever it wishes with almost all of the buildings it owns at SSFL, no matter how radioactive, that they are not subject to DTSC authority over the cleanup. But the PEIR and PMP go even further, making similar claims about DOE's buildings.

The PMP that DOE says it will dispose of debris from buildings with a history of radionuclide use in low-level radioactive waste or mixed low-level radioactive waste site. p. 14 But which debris is sent (all? only that over certain levels?) is not set forth. Furthermore, that is not the requirement in the AOC. It is that all waste over background be sent for LLRW disposal. Limiting it to buildings DOE declares had a history of radionuclide waste would violate the AOC; that history is very sketchy, for a site going to the 1940s, and we have seen contamination throughout Area IV, so it is not limited to the insides of buildings that did radioactive work.

The PMP (p. 37) states, "The removal programs for these non-permitted buildings and associated infrastructure are separate from the environmental cleanup and closure activities that DTSC regulates at SSFL. The authority for non-permitted building removal falls under the general building and permitting authority of Ventura County. DTSC does not have discretionary authority relating to the demolition and disposal of the non-permitted, non-hazardous SSFL buildings and infrastructure." This simply is false. DTSC has authority and responsibility for the cleanup of SSFL; Ventura County does not. In a footnote on p. 37, the PEIR states again that Ventura County has the authority over the demolitions, and that its authority is a ministerial process. Were DTSC's assertion correct, that it has washed its hands of any responsibility for issues associated with radioactive and chemical contamination of buildings that are to be demolished and their debris to be disposed of, and that only Ventura County has authority, and that authority is ministerial—meaning no discretion and no environmental review—then a key part of the environmental review of the cleanup required by CEQA would never take place. A County building department's ministerial approval of a demolition not involving radioactive and toxic contamination is vastly different than DTSC's discretionary obligations to oversee such a

cleanup. The County records attached hereto demonstrate that the DTSC assertions about their role are wrong. The County routinely states that it does not oversee compliance with cleanup regulations, and Boeing has consistently told the County that DTSC oversees Boeing's demolition activity at SSFL.

The PMP also states (p. 37), "The AOCs provide for a limited DTSC role in the general building demolition programs of the Responsible Parties. DTSC's primary role is to ensure that adequate waste characterization is to determine whether building debris is contaminated as hazardous waste and to determine appropriate handling methods for managing and disposing of said demolition debris." This also is incorrect. The AOCs, as show above, place DTSC over the entire cleanup, include buildings as part of "soil" to be cleaned to background, and required all waste above background to go to a LLRW disposal site. There is nothing in the AOCs that limit DTSC's role regarding the buildings to less than that of other soil types; its role in waste characterization is not limited to determining whether it is contaminated as hazardous waste, but instead largely to determine if it is contaminated with radioactivity and therefore must go to a LLRW site.

The PMP further states (p.37), "Similarly, DTSC has acted in an advisory role for Boeing's SSFL demolition program since 2009 to ensure appropriate debris characterization and disposal..." The record in the Consumer Watchdog case clearly shows that this is not true. The role has not been "advisory." Instead, Boeing has requested from DTSC approval for proposed demolitions and resulting disposals, and DTSC has granted those approvals.

The PMP asserts on p. 38, "DTSC has no direct authority over Boeing's demolition activities, but will continue to maintain an observational and advisory role with regard to Boeing's non-permitted building demolition activities." Again, these statements are inaccurate. It has direct authority (DTSC is the regulator for the cleanup of SSFL, the AOCs define all buildings in Area IV as part of the "soil" that is required to be cleaned up to background and disposed of in LLRW sites if over background, and DTSC's role is not that of observation and advice.

The PMP at p. 39 states: "DOE will submit to DTSC for its review and approval; a demolition plan, demolition schedule and detailed procedure that describe the activities that DOE shall perform in order to sample and characterize DOE's remaining buildings. This effort will determine whether they are contaminated with radiological or chemical contaminants, as well as the appropriate handling methods for the management and disposal of demolition debris. This AOC requirement ensures that DTSC provides sufficient oversight of the disposal procedures for building debris; and that it does not impact DOE's responsibility to prepare their own EIS, nor their authority to conduct non-regulated building demolition under DOE's own authority. Such demolition work will be conducted under DOE's decommissioning and demolition process and requires a building demolition plan for each building under DOE's authority. The building demolition plans will be developed in accordance with standard operating procedures to address the steps leading up to, implementing, and closing out such demolition." (Emphasis added.)

But the following paragraph contradicts this, saying, "DOE will keep DTSC informed of building demolition progress and measures to prevent impacts to regulated environmental media

at SSFL, and DTSC will provide *advisory* comments on expected standard operating procedures document. However; DTSC has no direct authority over DOE's demolition, except for the disposal aspect discussed above and in DOE's AOC, and thus will continue to maintain an observational and advisory role with regard to non-permitted building demolition activities." (Emphasis added.)

The first paragraph is the correct one: DTSC is the regulator and must approve DOE's demolition and disposal procedures and plans. It is therefore a discretionary act that requires a CEQA analysis, and this PEIR contains no such analysis.

On p. 48 of the PMP, DTSC asserts that DOE has the authority to clean up its facilities. That is misleading. Under RCRA, DOE must follow the orders of its regulator, DTSC; DOE doesn't get to choose how or how much to clean up. Similarly, under the AOC, DOE has no authority to decide to clean up SSFL to other than the agreed to standards, and it is DTSC that oversees and approves what DOE does.

In conclusion, the PEIR and PMP breach the AOCs, violate CEQA, and, if not cured, pose a substantial risk of contributing to harm to the environment and public health.

We have enclosed supporting material on a DVD. We have also attached to this letter copies of two reports prepared by Consumer Watchdog, Golden Wasteland and Inside Job, providing additional detail about concerns as to how DTSC is handling contaminated sites, including in particular Santa Susana.

Sincerely,



Consumer Watchdog

attachments: Ventura County Building Dept. documents
Golden Wasteland
Inside Job

DVD with CBG report and its attachments sent separately



County of Ventura Planning Division

800 South Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2488 • <http://www.ventura.org/rma/planning>

Construction/Demolition ZC13-0181

Assessor's Parcel No.: 6850051180

Date Issued: 03/14/2013
Date Expires: 9/14/2013
Fee: \$225.00
Issued By: C Mendoza

Property Owner:

BOEING NORTH AMERICAN INC

Mailing Address:

PO BOX 3707 M/C 6A1-01
ATTN PROPERTY TAX DEPT
SEATTLE, WA 98124

Telephone:

Applicant:

The Boeing North America The Boeing North America

Mailing Address:

PO BOX 3707 M/C 6A1-01
ATTN PROPERTY TAX DEPT
SEATTLE, WA 98124

Telephone: 562-209-4998

ZONING CLEARANCE TYPE: Construction/Demolition

Site Address: 5800 WOOLSEY CANYON,

Parent Case No.:

Lot Area Sq Ft: 17468355

Legal Lot Status:

Lot Area Acres: 401.02

Map & Lot No:

PROJECT DESCRIPTION: This zoning clearance to demolish 8891 sq. ft. of former buildings slabs, and to remove 58950 sq. ft. of exterior pavement. See project description for detailed information on this demolition project.

(Must comply with all local and federal cleanup regulations. *Compliance Not Regulated by County Staff*)

APPLICABLE ZONING:

Zoning RA-5 ac

Area Plan:

General Plan: Open Space

Zoning: RA-5 ac

Area Plan Designation: N/A

Split Zoning:

Zoning: OS-160 ac

Area Plan Designation: N/A

General Plan: N/A

BUILDING COVERAGE ALLOWANCE:

Maximum Building Coverage:

Building Coverage

Existing

Proposed

Combined

Prin. Structure(s) sf.

Accessory Structure(s) sf.

Total sf.

% of Bldg. Coverage

**Work Scope Information
Removal of Building 4006 in Area 4
Boeing Santa Susana Field Laboratory**

Introduction

The Boeing Company (Boeing) plans to remove man-made elements associated with building 4006 within the Boeing Santa Susana Field Laboratory (SSFL). This building no longer supports Boeing activity. The building has been cleared, inspected, sampled and prepared for demolition. The building has been cleared and prepared for demolition. The demolition plan has been submitted to DTSC and implementation is expected to commence in early February 2013.

Description of Project

Bldg. 4006 was constructed between 1957 and 1959. Its primary use was as a laboratory where liquid sodium coolant testing was performed. The facility ceased operations in 1999. Features currently existing at the site include a metal-topped canopy at the southeast end of the building and the remnants of a transformer substation to the southwest. Both features are included in the Bldg. 4006 demolition plan. Asphalt pavement surrounds the building on three sides, with a concrete pad on the southeast side. The building itself is divided longitudinally from the southeast to the northwest, separating the laboratory area on the west side from an office area to the east.

Demolition is defined as the complete removal of all building walls and roof system including interior and exterior elements, building utility support systems, and all related debris.

At the conclusion of demolition long-term erosion and dust control measures will be implemented as recommended and designed by professional consultants and consistent with State accepted Storm Water Pollution Prevention Plan (SWPPP) protocols.

Location and Setting

The demolition site is located at SSFL within the Area 4 parcel.

The approximate area included for the demolition (removal) totals roughly 32,800 sqft.

1. Approximate building size is 14,000 sqft.
2. Approximate area of exterior pavement, etc. to be removed is 18,800 sqft
3. Building primary construction is Steel Framed, Corrugated Sheet Metal sided with Corrugated Sheet Metal roof with built up roof covering

Please see Attachments for location details.

Removal Timing

The intended start date for demolition activities will be on or around January 14, 2012. The demolition effort, including removal of all debris, final dust control measures and erosion control implementation, will take ~3-4 weeks from start through completion.

02.11.13 B13.84



County of Ventura Planning Division

800 South Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2488 • <http://www.ventura.org/rma/planning>

Construction/Demolition ZC13-0068

Assessor's Parcel No.: 6850051180

Date Issued: 02/11/2013
Date Expires: 8/11/2013
Fee: \$155.00
Issued By: C Mendoza

Property Owner:
BOEING NORTH AMERICAN INC

Mailing Address:
PO BOX 3707 M/C 6A1-01
ATTN PROPERTY TAX DEPT
SEATTLE , WA 98124

Telephone:

Applicant:
Boeing north america inc. Boeing north america inc.

Mailing Address:
PO BOX 3707 M/C 6A1-01
ATTN PROPERTY TAX DEPT
SEATTLE, WA 98124

Telephone: 818-466-8255

ZONING CLEARANCE TYPE: Construction/Demolition

Site Address:

Parent Case No.:

Lot Area Sq Ft: 17468355

Legal Lot Status: Land Division

Lot Area Acres: 401.02

Map & Lot No:

PROJECT DESCRIPTION: Demolition of of a 14000 sq. ft. building B-4006, 18800 sq. ft. pavement area for the total of 32800 sq. ft. at The Santa Susana Field Laboratory (Must comply with all local and federal laws and regulations when demolishing this building and pavement area. *COMPLIANCE NOT REGULATED BY COUNTY STAFF*)

APPLICABLE ZONING:

Zoning RA-5 ac
Area Plan:
General Plan: Open Space

Zoning: OS-160 ac
Area Plan Designation: N/A

Split Zoning:

Zoning: RA-5 ac
Area Plan Designation: N/A
General Plan: N/A

BUILDING COVERAGE ALLOWANCE:

Maximum Building Coverage:

<u>Building Coverage</u>	<u>Existing</u>	<u>Proposed</u>	<u>Combined</u>
Prin. Structure(s) sf.	0	0	0
Accessory Structure(s) sf.	0	0	0
Total sf.	0	0	0
% of Bldg. Coverage	0	0	0



County of Ventura Planning Division

800 South Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2488 • <http://www.ventura.org/rma/planning>

Construction/Demolition ZC13-0750

Assessor's Parcel No.: 6850051120

Date Issued: 05/23/2014
Date Expires: 11/23/2014
Fee: \$155.00
Issued By: W Wright

Property Owner:
BOEING NORTH AMERICAN INC
Mailing Address:
PO BOX 3707 M/C 6A1-01
ATTN PROPERTY TAX DEPT
SEATTLE , WA 98124
Telephone:

Applicant:
BOEING NORTH AMERICAN INC BOEING NORTH AMERICAN II
Mailing Address:
PO BOX 3707 M/C 6A1-01
ATTN PROPERTY TAX DEPT
SEATTLE, WA 98124
Telephone: 818-466-8822

ZONING CLEARANCE TYPE: Construction/Demolition

Site Address: 5800 WOOLSEY CANYON,
Parent Case No.:
Lot Area Sq Ft: 23994097
Legal Lot Status: Land Division

Lot Area Acres: 550.83
Map & Lot No:

PROJECT DESCRIPTION: The demolition of building 1436 consists of the building itself, a concrete block planter extending along the north side of the building, and the inboard half of the concrete drainage ditch that runs primarily along the south side of the building. The roof of the building is constructed of steel panels that interlock with a caulking seal. Available records indicate that no significant chemicals usage occurred in building 1436 throughout the operational history of the building.

This demolition must comply with all federal and local cleanup laws and regulations. The demolition activities that are permitted pursuant to Zoning Clearance Case No. ZC13-0750 shall comply with all applicable requirements and enactments of Federal, State, and County authorities, including, but not limited to:

- The 2007 Consent Order for Corrective Action Regarding Clean Up of the Santa Susana Field Laboratory (Executed by and between the Department of Toxic Substances Control, Boeing Company, National Aeronautic and Space Administration, and U.S. Department of Energy);
- The Interim Source Removal Action ("ISRA") from the Los Angeles Regional Water Quality Control Board (December 2008);
- The Boeing Company's May 2009 Final Work Plan (which includes a Storm Water Pollution Prevention Plan) in response to the ISRA;
- Any and all Streambed Alteration Agreements ("SAA") issued to the Boeing Company by the California Department of Fish and Game; and,
- National Pollution Discharge Elimination System ("NPDES") Permit No. CA0001309, which was issued to Boeing as Waste Discharge Requirement ("WDR") Order No. R4-2007-0055.

APPLICABLE ZONING:

Zoning RA-5 ac
Area Plan:
General Plan: Open Space

Zoning: RA-5 ac
Area Plan Designation: N/A

Split Zoning:

Zoning: N/A
Area Plan Designation: N/A
General Plan: N/A



Via FedEx

February 11, 2013

In reply refer to SHEA-113190

Ms. Kim Prillhart
Ventura County Planning Division Director
Ventura County Planning Division
800 South Victoria Avenue, L-1740
Ventura, CA 93009-1740

Subject: Explanation for Planned Installation of Temporary Office Structure
Boeing Santa Susana Field Laboratory, Ventura County, California.

Dear Ms. Prillhart:

Following a telecon on 2-7-2013 with, and at the request of, Mr. Winston Wright, Ventura County Planning Department, the Boeing Company (Boeing) is providing this summary to help define reasons for installing a set of temporary/leased modular office units within Administrative Area 1 of the Boeing Santa Susana Field Laboratory (SSFL) as well as other requested background information.

Description of Leased units

In support of Boeing's continued closure efforts at the Santa Susana Field Laboratory, Boeing will require the installation of a 6,880 square foot leased single story modular office complex. This complex consists of a 1,440 square foot meeting room module, a 480 square foot restroom module, and 4 separate office modules with a total of 4,960 square feet.

This proposed modular office complex, to be called Building 1450 (B1450) will be located very close to the site's front entrance where visitors and contractors can be easily met. This location is on the former site of the 2012 demolished Building 1300. (34 Deg 14'08.76"N; 118 Deg 40'32.13"W). B1450 will be placed across the service road from Building 1436 (B1436). Both B1450 and B1436 reside on SSFL parcel # 658-0-051-120.

The need for the proposed modular office complex arises from the planned demolition of B1436. B1436 is the office location where the personnel, who will be relocated, currently reside. B1436 is a single story office building with a footprint of approximately 44,000 square foot. B1436 is the only Boeing office building remaining on the site. Because B1436 is largely unused and will become even more unused in the near future it has been designated for removal.

It should be noted that B1450 is being installed as detachable units. These units will be removed as the Boeing Environmental, Safety, and support personnel and contractor presence continues to reduce. This is consistent with a planned site occupancy reduction over the next few years. As a unit is no longer needed, it will be removed and returned to the owner with eventually all sections returning to the owner/supplier by year-end 2017.



Overview of near term Events

1. Establish modular office environment (B1450), March-April 2013
2. Relocate employees and on-site contractors from B1436, (within Area 1 and across the street) to B1450, April 2013
3. Prepare for demolition, seek Ventura County Zone Clearance, demolish/remove B436, May – July 2013

SSFL on site Activity

Boeing no longer has product research, development, manufacturing, testing, or personnel that support these functions at this site. All previous development, testing, etc. functions have been removed with the last Boeing program leaving the SSFL site in the summer of 2010. Further, there are no future plans for Boeing to restore this type of operation at this site.

The current office space in B1436 and proposed B1450 will be used by Boeing Environmental, Safety, and support personnel plus contractors to support the site closure and cleanup process with a goal to clean up locations affected by past business operations.

Administrative Oversight for Closure Activities at SSFL

Santa Susana is located on 2,850 acres of land in the Simi Hills area of eastern Ventura County. The site is divided into four administrative areas which reflect its current ownership and past operations. The Boeing Company is under regulatory oversight by the California Department of Toxic Substances (DTSC) and Los Angeles Regional Water Quality.

The site has ongoing environmental monitoring and cleanup programs that are performed under the oversight of local, state and federal agencies. Boeing works with the regulatory agencies to ensure that our operations are conducted safely and in full compliance with regulations. Below is a list of regulatory agencies with oversight responsibility for our operations:

Department of Toxic Substances Control (DTSC)

Under the Resource Conservation and Recovery Act (RCRA), DTSC oversees the investigation and cleanup of groundwater and soil contaminated with chemicals at Santa Susana. Also under RCRA, DTSC has the authority to issue and enforce hazardous waste facility permits. Permits are needed for facilities which treat, store or dispose of hazardous waste at their facility. Boeing has four areas under DTSC permits, and DTSC oversees all chemical (non-radioactive) hazardous waste activities in these areas. The DTSC also oversees all aspects of Boeing related demolition activities.

Regional Water Quality Control Board (RWQCB) - Los Angeles Region

The RWQCB is the lead agency responsible for regulating surface water discharge activities at Santa Susana. Under the authority of the Clean Water Act and the National Pollutant Discharge Elimination System (NPDES), the RWQCB sets maximum limits for chemical and radiological contaminants in surface water discharged from the site. These limits, along with requirements for discharge sampling, are incorporated into the site's NPDES Permit.



The RWQCB also shares responsibilities with DTSC for monitoring discharges to the groundwater. Soil and groundwater are being investigated and, where necessary, remediated at the Santa Susana Field Laboratory under the guidance of the Resource Conservation and Recovery Act.

California Department of Public Health (CDPH) - Radiological Health

CDPH enforces the radiation control laws and regulations designed to protect radiation workers, the public and the environment. Boeing is licensed by the CDPH to handle radioactive materials at Santa Susana. Although the CDPH does not have regulatory authority over the Department of Energy (DOE) activities at the site, DOE and Boeing have requested that the CDPH verify radiological cleanup procedures and activities. After each site is cleaned up, final sampling results, as well as verification sampling performed by the Oak Ridge Institute for Science and Education (ORISE), were submitted to the CDPH for review. Independent measurements and evaluations were made by the CDPH to confirm that these standards were met.

(RCRA) Corrective Action Program as administered by the California Environmental Protection Agency (CalEPA) Department of Toxic Substances Control (DTSC). More information about DTSC oversight of cleanup can be found on the DTSC Web site:

http://www.dtsc.ca.gov/SiteCleanup/Santa_Susana_Field_Lab/

Because of the size and complexity of the Santa Susana Field Laboratory site, Boeing Project Managers have developed an in depth, multi-level schedule which is used to track progress towards a completion of effort by the summer of 2017. A summary schedule which has been submitted to and supported by DTSC shows the critical deadlines for the SSFL RCRA Corrective Action Program.

B1450 will be used to house Boeing employees, consultants and contractors in support of the above mentioned Corrective Action Activities, the aforementioned programs and the final section of B1450 is timed to be removed from the site coinciding with the successful completion of said efforts.

Boeing would like to thank Ventura County Planning Division for its timely support to Boeing demolition efforts in the past.

Thank you for the opportunity to share this overview and we hope it helps clarify our intentions. If you have any questions, please feel free to contact Steve Fischer at (562) 209-4998 or Dave Dassler at (818) 466-8733.

Respectfully,

Steve Fischer
Project Manager, SSFL Demolition Activities
Boeing Shared Services Group, Site Services