



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Deborah O. Raphael, Director
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Edmund G. Brown Jr.
Governor

August 6, 2013

Sent Via Email

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ALLEGATIONS OF DEMOLITION AND DISPOSAL OF RADIOACTIVE STRUCTURES FROM SANTA SUSANA FIELD LABORATORY AND SHIPMENTS TO CLEAN HARBORS AND OTHER LICENSED FACILITIES

Dear Ms. Pressley and Ms. Brostrom:

This is in response to your letter of August 5, 2013, objecting to the demolition and disposal of structures and buildings from Area IV of the Santa Susana Field Laboratory (SSFL). In your letter, you allege that these activities have occurred without review of the environmental impacts and allege that the Department of Toxic Substances Control's (DTSC) and California Department of Public Health's (CDPH) actions have "...created the risk of imminent public harm through the disposal of radiologically contaminated material at levels above background in sites that are not licensed to receive such materials, including municipal landfills and metals recycling facilities." DTSC encourages you to provide irrefutable evidence supporting the unfounded allegations you have made.

As early as 2002, the United States Environmental Protection Agency (US EPA) conducted a document review and validation survey of the buildings in Area IV. Since that time, a myriad of regulatory agencies have been responsible for clearing the former radiological buildings for unrestricted use, including the United States Nuclear Regulatory Commission, US EPA, and the CDPH. Depending on their role, each agency has been responsible at various times for conducting historical document

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reviews, verification studies, and validation surveys to ensure each and every potentially radioactive structure and building can be released for unrestricted use.

In addition to review of any pre-demolition data submitted, including review by a DTSC in-house health physicist, DTSC secures the review of the CDPH. For former radiological buildings, DTSC also requests US EPA to conduct a data review and issue an opinion. DTSC's review is to assess a structure or building to determine if any hazardous chemical wastes are present that would require special handling and disposal. DTSC does not require the building demolition, but acknowledges that removal of structures will aid in completion of the characterization efforts. In this regard, DTSC is not making a discretionary decision that would trigger environmental review pursuant to the California Environmental Quality Act. The demolition of the buildings ultimately requires approval from Ventura County.

I am confident that the demolition activities being conducted in Area IV of the SSFL are being conducted in conformance with all federal, State and local laws, as well as the Orders DTSC has entered into with the responsible parties. Again, I invite you to provide evidence to support your claims or withdraw these otherwise unfounded allegations that unnecessarily alarm the public. If you choose litigation, we welcome the opportunity to address your mischaracterizations in a court of law.

Sincerely,



Stewart W. Black
Deputy Director
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