



Department of Toxic Substances Control (DTSC)
Public Input for Santa Susana Field Laboratory (SSFL)
Boeing – Area I Burn Pit Removal Action Work Plan (AIBP RAW)
Public Input Period (October 10, 2023 – November 15, 2023)
Public Input Online Zoom Meeting (November 9, 2023, 6p-8p)



Public Questions & Input Results

DECEMBER 13, 2023



Overview

- **114** Questions + input received by mail, email, GIS survey + the public meeting
- **247** Stakeholder questions + input extracted from the 114 submissions
- **6** Themes



Corrective Action + Oversight

AOCs + Settlement Agreement

Public Participation

Cultural + Biological

Health Impacts

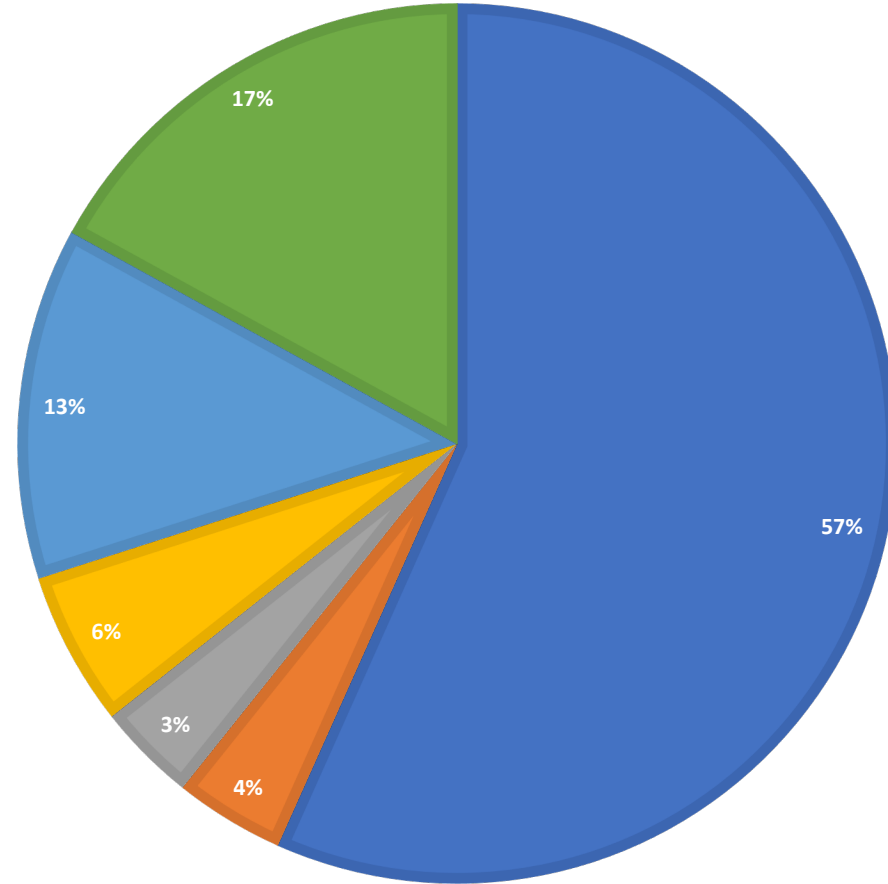
Lack of Trust



Overview

STAKEHOLDER INPUT

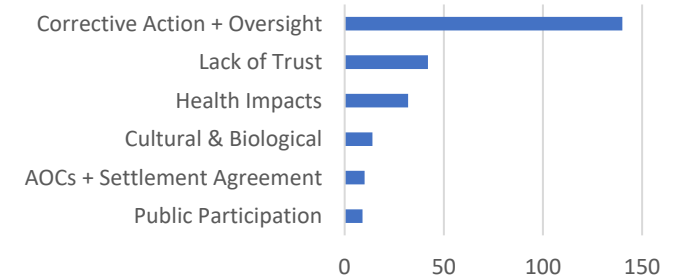
■ Corrective Action + Oversight ■ AOCs + Settlement Agreement ■ Public Participation ■ Cultural & Biological ■ Health Impacts ■ Lack of Trust



Corrective Action + Oversight (140 total, 57%)

- RAW is lacking specific and detailed clean up methods
- RAW excludes details pertaining to whether future clean up will fully remediate the areas insufficiently remediated by this RAW
- Concerns about contamination migration impacting air, soil, general water, stormwater, groundwater, wells, and the Silvernale pond
- Requests for confirmation sampling
- Can the polluters please not be the only ones doing the sampling? That is a conflict of interests.
- Data and report requests for all contaminants and chemicals of concern
- Data requests for soil measurements supporting the 6 feet for burrowing animals
- Request for laboratory reporting limits
- Request for soil characterization levels for each contaminant
- Radium is not included in the RAW table
- Some chemicals are missing from the RAW

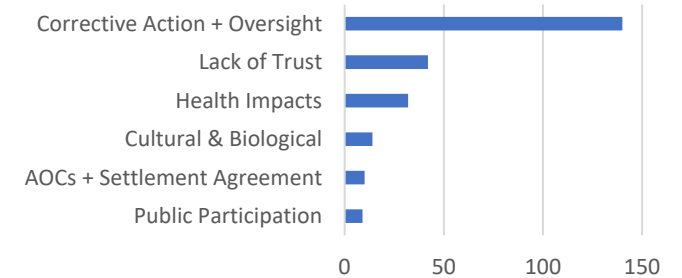
Stakeholder Input



Corrective Action + Oversight (140 total, 57%)

- Clean up standards are weak
- RAW soil remediation plan is insufficient
- Dust control measures are lacking details and specifics
- Contamination will be left behind
- Clean up should be protective of both human health & biological receptors
- Toxic soil samples are eliminated from the RAW
- The RAW was set in place when the IS&E was signed over a year ago
- All decisions have already been made & IS&E is a fraudulent order
- Doubts about DTSC field oversight
- Stormwater oversight should be daily, especially during the rainy season
- Strontium-90 does not have a remediation standard

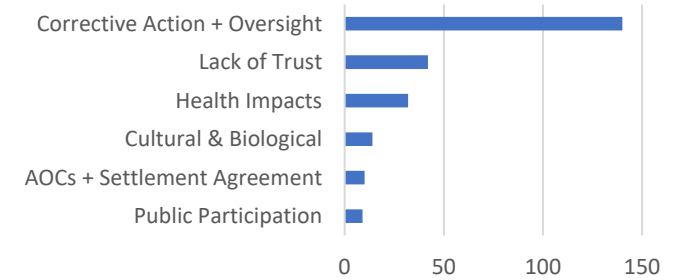
Stakeholder Input



Corrective Action + Oversight (140 total, 57%)

- What was the rationale for only considering depths of 0-6 ft for ecological impacts?
- The recent years' DOE building demolition SOP mandated water dampening for dust mitigation, but it was never implemented. How will DTSC ensure dust mitigation actually happens this time?
- Why are only 20 constituents of concern being specifically remediated, when this particular area is so deeply contaminated and there are literally over 300 COCs on site? This seems at odds with what we would expect of an ISE clean that poses an emergency risk of exposure. Why not do a thorough, health protective clean up now and be done with it?
- Every single quarterly NPDES monitoring report that coincides with storm events in the past 8 years includes multiple exceedances of pollutant limits. This last year, there were exceedances of TCDD. I have personally taken soil samples from other facilities and have found dioxins in samples taken at depths below 6 ft, These pollutants potentially exist in soil depths below 6 ft and there is a clear pathway for these contaminants to make it into the food web.

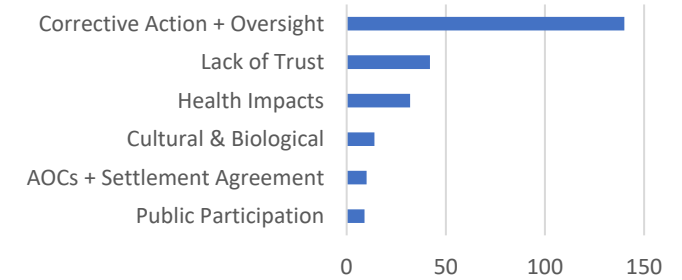
Stakeholder Input



Corrective Action + Oversight (140 total, 57%)

- Soil remediation goal for 20% of contaminants. Radium 226 is excluded radionuclide. ISE orders are meant to be protective. Eco risk-based screening levels are weak. Concentrations of contaminants left are not protective of the animals.
- The ISE order referenced the March 2021 RCRA Facility Investigation Data Summary and Findings Report for the Area I Burn Pit when identifying the 12 COECs that are being addressed in the RAW. However, the RFI reported 77 chemicals detected above screening levels, 35 of which were above the high EcoRBSLs. Why were the 12 chemicals selected for an ISE cleanup but not the other 65 which were also detected above screening levels?
- Why aren't you using the labs that were used when we did the Background studies that were EPA and DTSC approved labs?
- Will DTSC be present for ALL sampling?

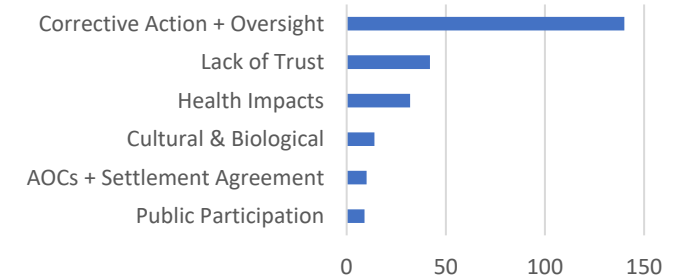
Stakeholder Input



AOCs + Settlement Agreement (10 total, 4%)

- All clean up should adhere to the AOCs
- Clean up should completely adhere to the original agreements reached in 2007 & 2010 that mandate a full clean up
- RAW does not adhere to the AOCs

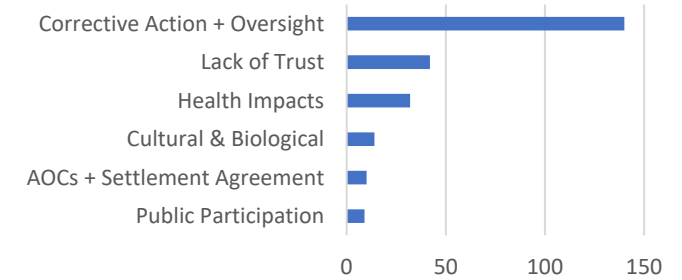
Stakeholder Input



Public Participation (9 total, 3%)

- When is the public meeting and what ways can I provide input?
- Request that this meeting be hybrid
- Where can I find the documents to review?
- Public requests for additional technical team meetings to ask questions and have a conversation without public input time limit
- Requests to see all public input emailed to DTSC outside of the public meeting to include DTSC responses
- The comment period will be fruitless & DTSC does not prioritize public input
- DTSC uses the public process to pretend to care
- Thank you for holding the meeting

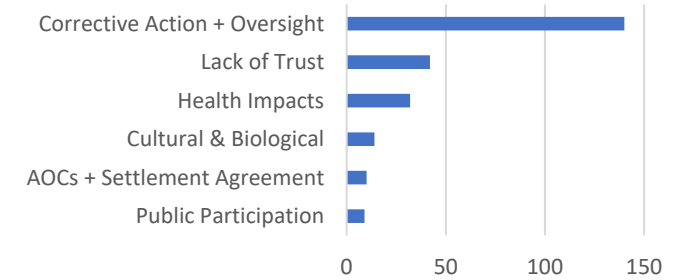
Stakeholder Input



Cultural + Biological (14 total, 6%)

- Clean up should consider cultural, biological, ecological, environmental, and human health
- RAW fails to protect wildlife by using inadequate standards based on species that do not sufficiently represent the wildlife at SSFL
- 6 feet burrow depth for deer mouse. Deer mouse has a shallow species, it should be CA ground squirrel that burrows below 6 feet. Outdated depths. 6 feet may not be enough. Storm events result in exceedances of dioxins that can penetrate deep into soil and run off offsite. Evidence for depth of remediation is not sufficient.
- Will there be Native American monitors as well as an archaeological monitor in this area?
- There are two species, the pocket gopher, and the CA ground squirrel that are found to burrow up to and deeper than 6 ft. The only citation on CA ground squirrel burrows is from 1946. With over a century of integrated pest management programs wholly designed to control and eradicate CA ground squirrels, data cited for average burrow depths needs to be up-to-date and far more robust
- 10-foot barrier is not enough distance. Tarplant is under the tarp. CTL5 storage is steep and the Tarplant is under it, CTL3 is better and already disturbed.

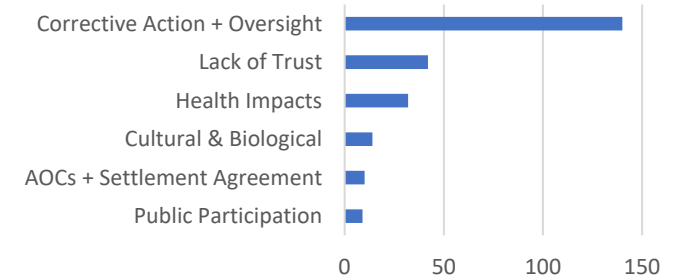
Stakeholder Input



Health Impacts (32 total, 13%)

- Clean up does not meet human health standards
- Personal cancer experiences
- Friends and family members with cancer, thyroid, and other health concerns
- Fearful of contaminated air and water
- Clean up is vital to the community and the safety of children
- Human health risks are missing from the RAW. How does this cleanup translate to human health? Early Action details, says no known source from radionuclides, but all waste came to Area I, and undocumented waste was left there as well at the gate.

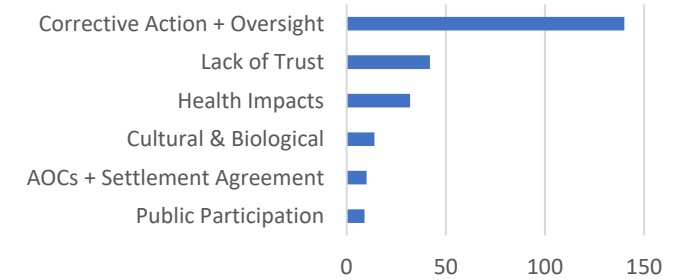
Stakeholder Input



Lack of Trust in DTSC (42 total, 17%)

- DTSC & Boeing's 2022 Settlement Agreement determined clean up behind closed doors
- RAW is a result of the deal made between DTSC and Boeing
- RAW does not establish how DTSC and Boeing will protect groundwater and the migration of disturbed and contaminated soil
- Using an IS&E order resulting in CEQA exemptions prevents the opportunity for legitimate public input and critical environmental review to influence the cleanup plans of one of the most contaminated areas of SSFL
- Questioning if DTSC will ever fully clean up the site
- Does not believe that DTSC will require further cleanup beyond the ISE order due to lack of trust. Public input is just a publicity move. Cleanup was already determined in a back-room deal.
- When is full clean up going to be completed and why is it taking so long?

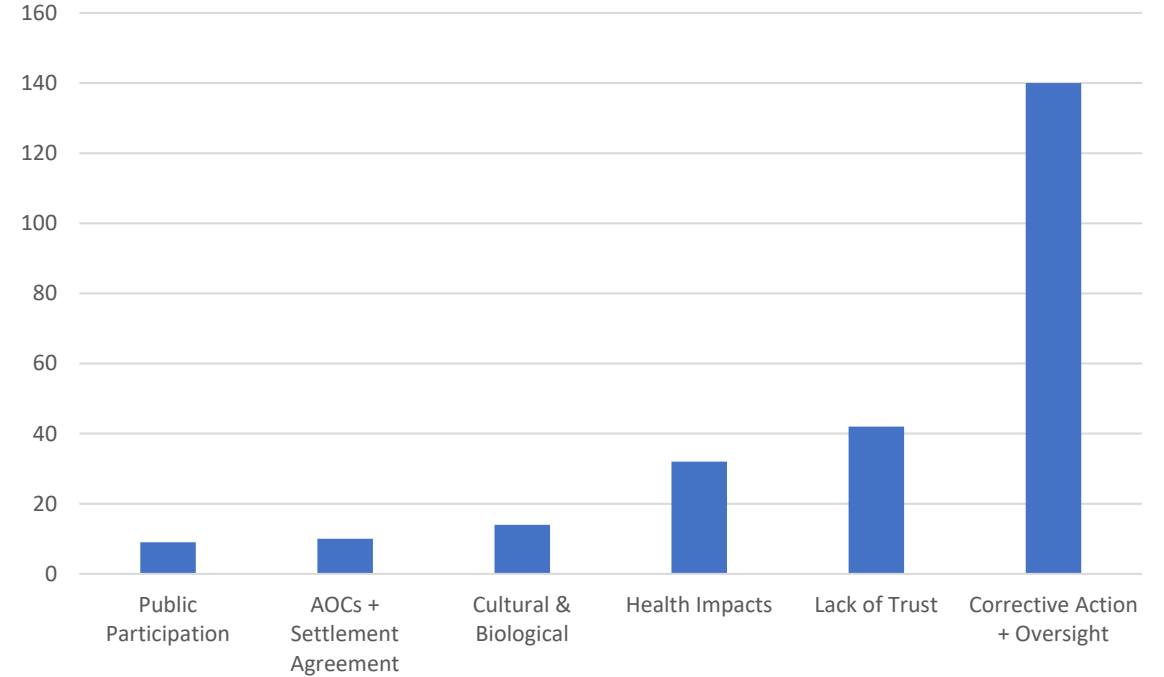
Stakeholder Input



Review

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END

