

**From:** [Phil Rutherford](#)  
**To:** ["Rainey, Laura@DTSC"](#); [michelle.banks-ordone@dtsc.ca.gov](#); [steven.becker@dtsc.ca.gov](#); [grant.cope@dtsc.ca.gov](#); [paul.carpenter@dtsc.ca.gov](#); [roger.paulson@dtsc.ca.gov](#); [john.jones@emcbc.doe.gov](#); [bfrazee@northwindgrp.com](#); [tcesnik@northwindgrp.com](#)  
**Cc:** [info@energysolutions.com](#); [mwalker@energysolutions.com](#); [clee@energysolutions.com](#); [mahallmark@energysolutions.com](#); [jbowne@energysolutions.com](#)  
**Subject:** RE: Santa Susana Field Laboratory  
**Date:** Thursday, March 11, 2021 3:59:16 PM  
**Attachments:** [image001.png](#)

---

Hi Laura, Michelle and Others,

I read, with interest, DOE's Phase 1 SOP (Revision 0) for demolition of the non-radiological buildings 4038, 4057, 4462 and 4463 at SSFL. Table 15-1 of the SOP makes it clear that all demolition debris from these buildings, *"out of an abundance of caution ... and irrespective of having characterization data showing no radioactivity"*, will be disposed of to the licensed LLRW site at Clive Utah, operated by EnergySolutions.

As stated in a footnote to Table 15-1, *"EnergySolutions is permitted, licensed, and authorized to receive, treat, and dispose Class A LLRW, NORM/NARM, Class A Mixed LLRW, 11e.(2) Byproduct Material, Special Nuclear Material based on concentration limits, Polychlorinated Biphenyl (PCB) Radioactive Waste, and PCB Mixed Waste."* Nowhere does it say EnergySolutions has a policy of accepting non-contaminated, non-LLRW.

You already know my views on this and I will not repeat them here.

I also read the DTSC letter to DOE, dated March 4, 2021. In it, DTSC refers to several communications between DTSC and DOE that do not appear on the EnviroStor database [https://www.envirostor.dtsc.ca.gov/public/final\\_documents2?global\\_id=80001329&enforcement\\_id=60478884](https://www.envirostor.dtsc.ca.gov/public/final_documents2?global_id=80001329&enforcement_id=60478884), namely,

- February 11, 2012 letter from DTSC to DOE outlining process for building radiation surveys to achieve consistency with the AOC
- February 25, 2012 letter plus enclosures from DOE to DTSC (did the accompanying 4038 and 4057 survey reports differ from those submitted in November 2019?)
- March 2, 2021 email from DTSC to DOE
- Record of DOE and DTSC discussions on March 3, 2021

Please provide these communications.

Although not explicitly referenced in the March 4, 2012 DTSC letter to DOE, please also provide all communications, letters, emails, telecon records between DTSC personnel and Dan Hirsch, relating to the subject matter, between November 19, 2020 and present. These may help to throw light on how the November 2020 Amendment to Order on Consent requirement that debris from non-radiological buildings 4038, 4057, 4462 and 4463 be sent to US Ecology, Idaho, was abruptly changed to require disposal to the licensed LLRW disposal site owned by EnergySolutions ... and the reasons why?

Looking ahead, and following shipment, it will be useful for DTSC and/or DOE to also provide the EnergySolutions form "Radioactive Waste Profile" and the NRC Form 540/541, "Uniform Low-Level Radioactive Waste Manifest" for the non-LLRW.

As a general comment on the EnviroStor database, it is not user friendly, documents are disorganized, are not sorted alphabetically or by program, and are not sorted chronologically, indeed many do not even have dates.

Thanks for your help.

Sincerely,

Phil Rutherford  
Mobile: +1 818-912-1501  
[email@philrutherford.com](mailto:email@philrutherford.com)  
[www.philrutherford.com](http://www.philrutherford.com)



**From:** Department of Toxic Substances Control <departmentoftoxicsubstancescontrol@dtsc.ccsend.com> **On Behalf Of**  
Department of Toxic Substances Control  
**Sent:** Thursday, March 11, 2021 8:04 AM  
**To:** email@philrutherford.com  
**Subject:** Santa Susana Field Laboratory



## **AMENDMENT TO ORDER ON CONSENT FOR INTERIM RESPONSE ACTION AT THE RADIOACTIVE MATERIALS HANDLING FACILITY Santa Susana Field Laboratory, Area IV - 2<sup>nd</sup> Work Notice**

The [Amendment to the Order on Consent for Interim Response Action at the Radioactive Materials \(RMHF\) Handling Facility Complex](#) requires the removal of the above ground portion of the remaining eight Department of Energy (DOE) owned buildings in Area IV of the Santa Susana Field Laboratory (SSFL). The work is being conducted to address emergency fire, erosion, risk, and structural integrity concerns associated with the buildings.

### **What work is being done?**

Demolition activities are complete for the Resource Conservation and Recovery Act (RCRA) permitted Radioactive Materials Handling Facility (RMHF), the Hazardous Waste Management Facility (HWMF Buildings 4029 and 4133), and the Systems for Nuclear Auxiliary Power (SNAP) Criticality Test Facility (Building 4019). In January 2021, DTSC approved the Standard Operating Procedure (SOP) for Buildings 4019 and the SNAP Reactor Environmental Test Facility (Building 4024). Building 4024 has an underground vault and will be demolished later this year during the dry season. Construction of a roof structure for the RMHF Radioactive Storage Building 4022 foundation and vault is in progress. DTSC approved the [SOP for the four remaining DOE buildings](#) (4038, 4057, 4462, and 4463) in Area IV [by letter on March 4, 2021](#). DOE, its contractors, and subcontractors are doing the work under DTSC oversight.

### **When will deactivation and demolition begin?**

Deactivation is complete for Buildings 4038, 4057 and 4024. Deactivation continues for buildings 4462 and 4463. Demolition of Building 4019 began in January 2021 and was completed in February 2021. Demolition of Building 4038 will start mid-March 2021 and take a month to complete. Demolition of Buildings 4057, 4462, 4463, and 4024 will occur later this year. Building work will occur Monday through Friday from 6:30 am to 4:00 pm.



Demolition of SNAP Building 4019



Demolition of Building 4019 frame structures

### **What are the transportation routes?**

Local transportation routes remain the [same](#), and transport will occur during off-peak hours. Debris may be transported on multiple days during the week. Debris will be disposed of at a licensed and authorized mixed low level radioactive waste disposal facility.

### **What safety measures are being taken to protect workers and the neighboring community?**

DTSC will continue with its current safety measures, including:

- Truck routes, driving speeds, appropriate weighing, labeling and trip manifest documentation
- Staging area location, management, and maintenance
- Best Management Practices regarding dust discharge
- Radiation screening

**What will happen next?**

The following steps will be taken after demolition:

- Clean and remove loose contamination.
- Cover and seal underground structures.
- Install roof structure for Building 4022's foundation and vaults.
- Install and seal asphalt and concrete pad surfaces.
- Conduct post-demolition inspections and a site evaluation one year after demolition.

**Building References**

| Amendment to the Order on Consent                                                           | Standard Operating Procedures (SOP)             |
|---------------------------------------------------------------------------------------------|-------------------------------------------------|
| <u>Building 4019</u> - Systems for Nuclear Auxiliary Power (SNAP) Criticality Test Facility | SNAP Flight System Critical Facility            |
| <u>Building 4024</u> - SNAP Reactor Environmental Test Facility                             | SNAP Environmental Test Facility (SETF)         |
| <u>Building 4038</u> - ETEC Office Building                                                 | ETEC Administrative Offices                     |
| <u>Building 4057</u> - Sodium Test Rig Facility                                             | Liquid Metal Development Laboratory (LMDL-2)    |
| <u>Building 4462</u> - Sodium Pump Test Facility (SPTF)                                     | Sodium Pump Test Facility (SPTF)                |
| <u>Building 4463</u> - SPTF Pump and Mechanical Part Cleaning Facility                      | Component Handling and Cleaning Facility (CHCF) |

**Where can I get more project information?**

DTSC EnviroStor database:

[https://www.envirostor.dtsc.ca.gov/public/final\\_documents2?global\\_id=80001329&enforcement\\_id=60478884](https://www.envirostor.dtsc.ca.gov/public/final_documents2?global_id=80001329&enforcement_id=60478884)



**DTSC Contacts:**

Laura Rainey, Project Manager  
Email: [Laura.Rainey@dtsc.ca.gov](mailto:Laura.Rainey@dtsc.ca.gov)  
Phone:(714) 484-5434

Michelle Banks-Ordone, Public Participation Specialist  
Email: [Michelle.Banks-Ordone@dtsc.ca.gov](mailto:Michelle.Banks-Ordone@dtsc.ca.gov)  
Phone: (818) 717-6573

Department of Toxic Substances Control, PO Box 806, Sacramento, CA 95812-0806

SafeUnsubscribe™ [email@philrutherford.com](mailto:email@philrutherford.com)

[Forward this email](#) | [Update Profile](#) | [Customer Contact Data Notice](#)

Sent by [michelle.banks-ordone@dtsc.ca.gov](mailto:michelle.banks-ordone@dtsc.ca.gov) powered by



[Try email marketing for free today!](#)

