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**Subject:** Obsolete References to SB 990 on DTSC's SSFL Website  
**Date:** Thursday, June 17, 2021 9:55:04 AM

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Dear Mr. Cope,

Some time ago, seven months to be precise, I notified you of information on DTSC's website regarding SB 990 that is obsolete and should be removed, [https://www.philrutherford.com/Personal\\_Communication/SB\\_990\\_Letter\\_to\\_Cope\\_2020-11-16.pdf](https://www.philrutherford.com/Personal_Communication/SB_990_Letter_to_Cope_2020-11-16.pdf).

At that time, you committed to review my request and get back to me, [https://www.philrutherford.com/Personal\\_Communication/SB\\_990\\_Email\\_from\\_Grant\\_Cope\\_2020-11-17.pdf](https://www.philrutherford.com/Personal_Communication/SB_990_Email_from_Grant_Cope_2020-11-17.pdf).

I am still waiting for that reply. It was therefore no surprise, that I have also found several other references to SB 990 that should also be removed.

#### **Site Operations and History**

Replace Rocketdyne with Boeing (5 instances).

Delete the entire section on Senate Bill 990 (Kuehl).

Remove all references to SB 990 in the RCRA Section.

[https://dtsc.ca.gov/sitecleanup/santa\\_susana\\_field\\_lab/ssfl\\_site\\_activities\\_overview/](https://dtsc.ca.gov/sitecleanup/santa_susana_field_lab/ssfl_site_activities_overview/)

#### **SSFL Facility Investigation**

Remove the first paragraph discussing SB 990 and subsequent references to SB 990.

[https://dtsc.ca.gov/sitecleanup/santa\\_susana\\_field\\_lab/ssfl\\_site\\_activities\\_rcra/](https://dtsc.ca.gov/sitecleanup/santa_susana_field_lab/ssfl_site_activities_rcra/)

#### **SB 990 and the California Superfund Law**

Remove all reference to SB 990.

[https://dtsc.ca.gov/sitecleanup/santa\\_susana\\_field\\_lab/ssfl\\_regulatory\\_oversight\\_sb990\\_ca\\_superfund/](https://dtsc.ca.gov/sitecleanup/santa_susana_field_lab/ssfl_regulatory_oversight_sb990_ca_superfund/)

#### **SSFL Other Agencies**

##### **California Department of Public Health - Radiologic Health Branch**

Clarify that CDPH-RHB is the only California state agency granted authority by the Nuclear Regulatory Commission (NRC) to regulate non-DOE radioactive materials at SSFL.

[https://dtsc.ca.gov/sitecleanup/santa\\_susana\\_field\\_lab/ssfl\\_regulatory\\_oversight\\_other\\_agencies/](https://dtsc.ca.gov/sitecleanup/santa_susana_field_lab/ssfl_regulatory_oversight_other_agencies/)

##### **U.S. Department of Energy**

Remove reference to SB 990.

[https://dtsc.ca.gov/sitecleanup/santa\\_susana\\_field\\_lab/ssfl\\_regulatory\\_oversight\\_other\\_agencies/](https://dtsc.ca.gov/sitecleanup/santa_susana_field_lab/ssfl_regulatory_oversight_other_agencies/)

#### **Risk Assessment**

Please review all DTSC SSFL web pages for references to risk assessment. Clarify for the public, that the 2010 AOCs with DOE and NASA forbids the use of risk assessment and explain why. Explain why, while SB 990 was still law, did DTSC impose the 2010 AOCs that require a zero-risk goal in violation of state and EPA Superfund risk assessment guidance.

### **SSFL Mediation**

On a related matter, in DTSC's Statement on SSFL Mediation, reference to the Committee to Bridge the Gap (CBG) and the Natural Resources Defense Council (NRDC) as "partners" suggests inappropriate backroom collusion between a state regulator and activist organizations. These same organizations have sued DTSC, DPH and DOE in federal and state court several times with the express intent of delaying progress in SSFL remediation. Hardly the actions of "partners."

[https://dtsc.ca.gov/sitecleanup/santa\\_susana\\_field\\_lab/ssfl\\_whats\\_new/](https://dtsc.ca.gov/sitecleanup/santa_susana_field_lab/ssfl_whats_new/).

Sincerely,

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