

From: [REDACTED]
To: Owens, Cassandra; David Hung; [REDACTED]; BridgetKelly; [REDACTED]; Jarrod DeGonia; Louise Kishoff; Art Lenox; KamaraSams; Steven L Shestag; Thomas D Gallacher; ctuck@calepa.ca.gov; LindaAdams; Esther Feldman; GREIG SMITH; Gerard Abrams; [REDACTED]; Maziar Movassaghi; [REDACTED]; Susan Callery; Thomas Johnson; Stephanie Jennings; William Backous; cooper.craig@epa.gov; CraigCooper; Dempsey.#032#Gregg@epamail.#032#epa.#032#gov; Montgomery.Michael@epamail.epa.gov; Moutoux.#032#Nicole@epamail.#032#epa.#032#gov; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; Billie Greer; Phyllis Winger; Elton Gallely; [REDACTED]; (MSFC-AS10) James A. Elliott; Fellows Merrilee HQ-NB000; [REDACTED]; [REDACTED]; jason.levin@sen.ca.gov; Rebekah Rodriguez-Lynn; Sharon Sekhon; [REDACTED]; Damon Wing; [REDACTED]
Subject: Re: SSFLCAG meeting on Agreement in Principle - to Administrative Order on Consent-20101013 2033-1"
Date: Thursday, October 14, 2010 9:36:55 AM

Dear Mr. Brausch et al:

Once again, Ms. Walsh has put her finger directly on the issue on the center of this much larger discussion - and has outlined the critical areas of concern and indeed scientific shortfall.

Having watched this critical cleanup process for over ten years now, I agree that this entire "We Win! Yaaay, AIP!" process seems politically driven in its timing - fine, we'll take it - but without giving proper attention and process to these extremely real shortcomings in this brief outline, we are committing our community to an uncertain future that's possibly as damaging as leaving the material in place.

We will receive an unwieldy excavation process with no scientific step-out investigatory procedure...we're being pushed to accept an agreement that skips over entire areas of concern (like groundwater treatment, like categorization of soil, like banning any and all 'in situ' treatments for experimentation or application) -- and this 'rush to completion' for someone's political gain is as damaging as DOE's national 'rush to Accelerated Cleanup' of ten years ago - and from which they've backed off in the face of our strong commitment to a proper cleanup.

We will not waver in our commitment to a proper cleanup - not even for the delightful goal of being able to declare, "Yaay, we win! We're done!" Because we're not.

Thank you, Mr. Brausch, and we all look forward eagerly to DTSC's response to these and all the other comments you've been receiving regarding the AIP's flaws.

Sincerely,

Elizabeth Crawford

On 10/14/10 9:03 AM, "Christina Walsh" [REDACTED] wrote:

Dear Mr. Brausch, et al.,

I wanted to provide to you a link to the recently recorded CAG meeting held via webex yesterday, October 13, 2010. Since the AIP announcement for an agreement in principle, which is supposed to provide a real path forward toward much needed clean-up of the Santa Susana Field Laboratory, we have found that there are significant limitations written in to the AIP. These limitations will profoundly limit the ability to use the latest science has to offer, in phyto-remediation techniques, as well as all other proven in-situ solutions that would otherwise limit the amount of soil removed, as well as using balancing criteria to help make those decisions, as written in SuperFund law. This will also send staggering soil volumes, to potentially fill landfills with soil that is otherwise considered background. (Example ISRA Cesium issue on Area II where soils have been stonewalled for a year on this basis)

We have requested a meeting with all responsible parties and regulators, prior to the agreement being written into stone in the form of an Administrative Order on Consent. This meeting should be inclusive to all community

members, interested stakeholders and all RPs.

We are concerned that this rush to finalize without adequate discussion with the impacted communities, is more related to getting a deal before the election. After the many years we have watched on, as the regulatory powers that be, have stone-walled solution after solution because of political pressures. We saw the political circus at the front gate in the papers just a few weeks ago, trying to force this solution before November.

Not a word about these very significant issues related to protection of the current environment, the current residents surrounding the area, just "we win", with no real focus on protection, just haul it away and count the trucks. Considering this is the most important decision related to this site in at least 20 years, it is highly inappropriate, and there is simply too much at stake to have regulators run rough-shod over the community in the interest of taking political credit. This has to be about science, not revenge-science. These solutions must be based on the best technologies available, not a political document where clearly, no scientific experts within the agency provided input. In fact, it's been made clear by the document, that the technical input from DTSC's scientific experts were not consulted or even welcome.

The fact that the AIP specifies how waste is to be classified, on such a high-level non-technical document, and does so in such a way that could cost up to ten-fold in disposal costs, while inappropriately filling landfills specially designated for LLRW radioactive waste with material that is essentially background, not to mention the fact that the State of California has no business designating how waste should be classified outside California. Some may not care, and just feel that "make 'em pay" is the best way forward, but again, this needs to make sense, both from a public health perspective, environmental perspective, as well as from a financial perspective, and unless the state plans to start printing money, we've got to think more responsibly! The financial situation the entire world is in, cannot be ignored in favor of revenge-science. To make such a mandate, that affects waste regulation outside California in this document that is specific to a single facility, is a perfect example of how the State's recent behavior has pushed the primary landowner (Boeing) to seek legal resolution because the law is specific to one facility and is now being used to regulate the operations of many facilities outside of California. We cannot afford to have this clean-up investigation to be mis-used in this way and we have been waiting far too long to accept taking these risks with a clean-up that is so important to the future of our communities.

This document has to be designed with the intent to implement. The current design of the document is impossible to implement as written, and also follow CEQA, which DTSC and EPA are required to follow.

This community needs assurances as to how this will be accomplished. So far, Mr. Brausch, you have acknowledged the limitations of the AIP as I have stated here, but with no solutions in mind as to how to deal with these shortcomings, I believe it is crucial that this discussion with the communities occur first. I ask that you provide an evening meeting where ALL responsible parties are available and welcome to participate, that is noticed to the entire surrounding communities using all mailing lists from all agencies and RPs. This is too important to move forward without this discussion with the community. We need and deserve to hear how you plan to accomplish this, and how these decisions will be balanced with protecting the existing surrounding environment without balancing criteria as set forth in Ch. 6.8, I urge you to reconsider having a meeting prior to the finalization of these issues in the AOC.

I would appreciate a response, as soon as possible. Please take the time to listen to the discussion on the link below, and please know that there have been many of these discussions, despite the State's unwillingness to even acknowledge us as a CAG. These are profound shortcomings that will have a lasting impact on all of us here who live near the site. I urge you to consider us, in this decision and to include us on a more transparent and inclusive basis. Let's try to leave politics at the door and have a real discussion.

Thank you in advance,
Christina Walsh
cleanuprocketdyne.org



Begin forwarded message:

From: Christina Walsh [REDACTED]
Date: October 14, 2010 7:20:05 AM PDT
To: [REDACTED]
Subject: Invitation to view WebEx recording "SSFLCAG Agreement in Principle - to Administrative Order on Consent-20101013 2033-1"
Reply-To: [REDACTED]

I want to share the following WebEx recording with you. Click the link below to play it:

[REDACTED]

SSFLCAG Agreement in Principle - to Administrative Order on Consent-20101013 2033-1
October 13, 2010, 2:29 pm San Francisco Time
50 mins

Here is a recording of yesterday's SSFL CAG Meeting. Thank you all for participating, I will send out written minutes with time-stamp to enable listening to specific parts of the meeting. Thanks again, Christina

If you need assistance, you can contact me at [REDACTED]

[REDACTED]