



Santa Susana Field Laboratory Inconvenient Truths

<https://philrutherford.com/ssfl.html>

2010 AOC (2010) and SB-990 (2007)

- Did Hirsch ghost-author SB-990 for Shiela Kuehl?
- Did Hirsch and Rick Brausch conspire to remove Norm Riley as DTSC SSFL Director?
- Boeing sued the State and DTSC and defeated SB-990
- Did Hirsch co-author the 2010 AOC with Rick Brausch?
- 2010 AOC defines soil to include building structures without defining structure LUTVs
- A cleanup-to-background mandate does not exist in any other NRC, DOE, EPA, DTSC or other state cleanup program anywhere in California or the United States
- No other federal or state environmental regulation for chemicals or radionuclides mandates a ZERO limit for concentration, dose or risk
- EPA drinking water supplier MCLs are based on 4 mrem/y or a risk of approximately 10^{-4}
- Naturally occurring radionuclides in clean soil have a residential risk of approximately 1%

Sodium Reactor Experiment (SRE) Accident (1959)

- The extent of core damage, fuel melt and releases from the SRE were much less than TMI-2
- In the 2009 DOE public workshop, three experts agreed that the risks to the public from the SRE accident were low to negligible compared to background risks
- If an estimated 1,300 curies of cesium-137 had been released, as alleged by Hirsch's Advisory Panel, the areal extent and concentrations of soil contamination would have been orders of magnitude greater than levels found by USEPA both onsite and far distant from the site
- Dr. Beyea, a consultant to Hirsch's Advisory Panel, concluded that, even if the exaggerated releases claimed by the Advisory Panel were true, the increase in hypothetical cancers "*would have occurred among a background of millions of [real] cancers in the population exposed in the LA Basin, including a contribution from natural background radioactivity that would have exceeded the contribution from SSFL*"

USEPA Radiological Survey of Area IV (2009-2012)

- Only 8 of 3,542 soil samples and 128,000 analyses exceeded prior State and DOE approved cleanup standards for residential land use
- No soil samples exceeded the USEPA acceptable risk range for open space recreational land use



- Even Hirsch's favorite 1,000 X background cesium-137 sample is relatively benign. One would have to lie down in that location 24/7 for two weeks in order to receive the radiation dose equivalent to one round-trip airline flight from Los Angeles to New York

Morgenstern Community Health Study (2007)

- The study contract was sole sourced to UCLA, and was not open bid
- The study was never published in any professional journal, therefore was never peer reviewed
- Neither the sponsor, ATSDR, nor the funding source, Eastern Research Group, issued any public statement supporting the Morgenstern study or the related Cohen exposure study
- Methodology and conclusions were heavily criticized by two national experts in public health and epidemiology, Professor Alan Warren and Professor William Blot
- The study focused on several rate ratios >1 and ignored a larger number of rate ratios ≈ 1 and <1
- Morgenstern could not explain why many hispanic rate ratios close to SSFL were elevated, while corresponding rate ratios of the predominant non-hispanic white population close to SSFL were not elevated
- Morgenstern used the incorrect Poisson assumption to calculate the standard deviation of the baseline Los Angeles and Ventura County cancer rates. This resulted in an unrealistically narrow distribution that did not reflect the real empirical distribution of county census tracts. As a result, standard deviations of rate ratios were unrealistically small, exaggerating the statistical significance of the infamous "60% increase"

Boeing-Owned Decommissioned Buildings (2013-2023)

- PSR-LA lost its 10-year lawsuit against DTSC, CDPH and Boeing in the CA Superior Court and in the CA Appeals Court. The CA Supreme Court declined to even review the case
- Alleged "underground regulations" are still in use by the CDPH Radiologic Health Branch, the Nuclear Regulatory Commission and the Department of Energy
- The courts stated that former radiological/nuclear facilities that have been decommissioned, surveyed, released for unrestricted use, and removed from a regulatory license, are no longer "regulated radioactive material" and cannot be arbitrarily declared to be low-level radioactive waste (LLRW)

DOE-Owned Decommissioned Buildings (2021-2022)

- DTSC pressured DOE into sending decommissioned material and demolition debris from buildings with no history of radiological use, to an out-of-state LLRW disposal site
- Thus DTSC violated the subsequent 2023 court decision that stated that decommissioned material is not LLRW