

Dear Governor Newsom:

We are writing you on behalf of Public Employees for Environmental Responsibility (PEER) and Parents Against Santa Susana Field Lab concerning recent and pending actions by the state Department of Toxic Substances Control (DTSC) that endanger public health in the communities surrounding the Santa Susana Field Laboratory (SSFL). SSFL, a former nuclear reactor and rocket testing facility located in the LA area with 700,000 people within 10 miles, is arguably one of the most contaminated sites in the state.

On or about October 1, 2021, two buildings, the Sodium Pump Test Facility and the Sodium Cleaning and Handling Facility, Buildings 4462 and 4463, in the Boeing-owned nuclear area (Area IV) of the Santa Susana Field Laboratory were blown up with explosives by contractors for the Department of Energy (DOE). The buildings had been identified by USEPA as Class 1, meaning the highest category of potential for radioactive contamination, and DOE agreed that the debris from the demolition must be disposed of in a licensed low-level radioactive waste disposal facility.

To the best of our knowledge, this extraordinary act of blowing up a potentially contaminated building was done without benefit of requesting a demolition permit from the County Resource Management Agency, without a Fire Code Operational Permit for use of explosives, and in abrogation of the dust control requirements specified in the Standard Operating Procedure (SOP) for the demolition. See p. 24 of SOP at [https://www.dtsc-ssfl.com/files/lib\\_doe\\_area\\_iv/Demo\\_HWMF\\_six\\_DOE\\_Bldgs/69461\\_SOP\\_Phase\\_1\\_DOE\\_Buildings\\_4038\\_4057\\_4462\\_and\\_4463\\_03\\_03\\_2021.pdf](https://www.dtsc-ssfl.com/files/lib_doe_area_iv/Demo_HWMF_six_DOE_Bldgs/69461_SOP_Phase_1_DOE_Buildings_4038_4057_4462_and_4463_03_03_2021.pdf).

Indeed, DOE released video footage of the explosion: <https://www.energy.gov/em/articles/final-doe-buildings-safely-come-down-etec-site>. Additional footage, from multiple angles, is found at <https://youtu.be/RqeqKteYcag>. As you can see, there were no apparent attempts to contain or mitigate the dust plumes following the detonations. Yet, the SOP (p. 24) required such measures:

Dust, an unpreventable byproduct of any type of demolition operation, will last in the general vicinity for five (5) to ten (10) minutes following the energetic felling. The duration of the airborne dust will be a direct function of the wind direction and velocity at the time of the energetic felling. **Dust prevention and control measures, including the use of water cannons to create a curtain to collect the dust, will be in place during demolition and felling operations.** (Emphasis added)

In addition, the DTSC apparently allowed this to occur, with no environmental review as set forth in the California Environmental Quality Act (CEQA), no opportunity for public comment on the SOP's plan to blow up the building, and with no enforcement action taken over the failure to follow the SOP requirements for "water cannons to create a curtain to collect the dust."

Furthermore, nearby residents have for the last year reported booms and the sky lighting up above SSFL, so the issue of explosive demolition of structures at SSFL may extend far beyond the most recent event of October 1.

The Santa Susana Field Laboratory consists of 2850 acres, in Ventura County. Ten reactors operated at the site, four of which are known to have had accidents, including a partial meltdown. On the order of 30,000 rocket tests, many with toxic rocket fuels, were conducted. Radioactive and toxic wastes were for years burned in open-air burn-pits. Separately, in 1996, two workers were killed in an explosion involving hazardous wastes; Rocketdyne pled guilty to three felony charges involving the illegal disposal of these materials.

There is widespread radioactive and toxic chemical contamination of soil, surface and groundwater, and buildings. A federally funded study led by UCLA Professor Yoram Cohen found contaminants had migrated from the site at levels exceeding EPA's levels of concern. <https://www.rocketdynecleanupcoalition.org/resources/documents/potential-for-offsite-exposures-associated-with-santa-susana-field-laboratory/> A separate federally funded study by Professor Hal Morgenstern of the University of Michigan found a greater than 60% increase in rates of key cancers associated with proximity to SSFL. <https://www.rocketdynecleanupcoalition.org/files/UofM-Rocketdyne-Epidemiologic-Study-Feb-2007-release.pdf>

The US Environmental Protection Agency conducted a \$40 million radiological survey of Area IV about a decade ago. As part of that work, it prepared a Historical Site Assessment (HSA) which categorized different sites in Area IV as Class 1, 2, or 3, pursuant to the classification requirements in the Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM). (MARSSIM was prepared by EPA, NRC, DOE, and DOD, and can be accessed at <https://www.epa.gov/radiation/download-marssim-manual-and-resources>.) Class 1 sites are those with the highest potential for radioactive contamination. (See MARSSIM, p. 4-11.)

EPA ranked both Building 4462 and 4463 as Class I, having the highest potential for contamination. See EPA HSA Table Table 1.3c, Summary of Subarea HSA-5C Sites Potential Radiological Contaminants of Concern. EPA identified as potential radionuclides of concern at these buildings U-233, U-234, U-235, U-236, U-238, Th-232, Np-237, Pu-238, Pu-239, Pu-240, Pu-241, Th-228, Ra-228, Th-230, Ra-226, Pb-210, Pa-231, Ac-227. Moreover, DOE has agreed that all debris from the buildings needed to be disposed of as radioactive waste.

Further, in its radiological survey, EPA found elevated strontium-90, above the Field Action Level or FAL, in soil near Building 4462. See pdf pp. 44, 87: [https://www.dtsc-ssfl.com/files/lib\\_doe\\_area\\_iv/epaareaivsurvey/techdocs/65789\\_Final\\_Radiological\\_Characterization\\_of\\_Soils\\_122112.pdf](https://www.dtsc-ssfl.com/files/lib_doe_area_iv/epaareaivsurvey/techdocs/65789_Final_Radiological_Characterization_of_Soils_122112.pdf)

In short, we find it both astonishing and highly disturbing that a department of the State of California would sanction such actions. We are writing to ask that you identify the responsible DTSC officials and discipline them as appropriate for any failures leading to this fiasco.

Furthermore, DTSC has been holding secret negotiations for much of the year with Boeing, which owns much of SSFL and is responsible for much of the contamination. We are concerned that a deal is imminent to allow Boeing to walk away from cleaning up much or most of its

contaminated soil and groundwater, obligations it assumed in a legally binding agreement in 2007. We cannot begin to express the adverse reaction such a deal with the polluter would trigger among the community and local and Congressional elected officials.

We ask your direct involvement to stop any such deal to weaken the cleanup obligations for the site and to take concrete steps to getting the cleanup back on track and to redirect DTSC from acting in ways that threaten rather than protect the public health and safety.

Should you desire any additional information, we are more than happy to provide it.

Sincerely,

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cc. Jared Blumenfeld, Secretary California Environmental Protection Agency