

Department of Toxic Substances Control



Meredith Williams, Ph.D., Director 8800 Cal Center Drive Sacramento, California 95826-3200

Transmittal via Email Only

August 27, 2024

Tiffany N. North **County Counsel** County of Ventura 800 South Victoria Avenue Ventura, CA 93009 Tiffany.North@ventura.org

RESPONSE TO JULY 12, 2024 LETTER REGARDING SANTA SUSANA FIELD LABORATORY CLEAN-UP

Dear Ms. North:

The Department of Toxic Substances Control (DTSC) received your July 12, 2024 letter regarding the Santa Susana Field Laboratory (SSFL). This letter responds to the concerns expressed by the County of Ventura regarding the status of cleanup activities at SSFL and anticipated milestones related to those activities. I also want to acknowledge our appreciation to you and Shaye Diveley at Meyers Nave for the two meetings held with DTSC's Office of Legal Counsel (OLC) since July. While we are anticipating a request from Ventura County for a meeting about the status of cleanup activities at SSFL, I want to affirm the sentiment expressed by OLC to meet with you on a regular basis to discuss cleanup activities at SSFL.

DTSC shares your compelling interest in ensuring a timely, thorough cleanup of the contamination at SSFL. DTSC's mission is to protect human health and the environment from toxic substances, as well as to restore contaminated land. This mission directs our focus and efforts on the SSFL cleanup. The cleanup of SSFL is complex, requiring interim emergency cleanup activities, as well as planning for final site cleanup pursuant to existing orders and agreements with the three Responsible Parties (RPs).

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Groundwater cleanup by the RPs is governed by the 2007 Consent Order. For the Boeing Company (Boeing), groundwater is also governed by the 2022 Settlement Agreement. Pursuant to the 2010 Administrative Orders on Consent (AOCs), soil cleanup to local background levels is required for the two federal RPs, the U.S. Department of Energy (DOE) and National Aeronautics and Space Administration (NASA). A risk-based soil cleanup by Boeing is governed by the 2022 Settlement Agreement. In July 2023, DTSC certified the final Program Environmental Impact Report (PEIR) to further advance the sitewide cleanup of SSFL.

In response to your concern "that there has not been significant movement" since DTSC certified the final PEIR, DTSC acknowledges that in 2023 the project timeline for the release of draft decision documents anticipated releasing the NASA Draft Groundwater Corrective Measures Study Report (GW CMS) and draft Statement of Basis for public comment in December 2023. However, the final PEIR was certified in July 2023, and NASA's draft GW CMS was not submitted to DTSC until January 2024. It's important to note that a Statement of Basis when finalized is a decision document, as discussed below. Decision documents are complex and require public comment periods. While DTSC is continuing to improve the accuracy of SSFL project timelines, schedules may be delayed when necessary to ensure time for DTSC to prepare thorough draft decision documents for public review and comment.

In December 2023, DTSC publicly noticed a groundwater workshop series from January to April 2024. DTSC hosted the groundwater workshops to prepare the public to review and comment on the draft groundwater decision documents. The final event in the workshop series was a public site visit at SSFL on April 6, 2024 that included numerous opportunities for interactive dialogue.

DTSC's technical review of the NASA GW CMS is in progress. In June 2024, DTSC received Boeing's draft GW CMS, which is currently in technical review. The Los Angeles Regional Water Quality Control Board (Water Board) is also providing its technical analysis to DTSC to ensure compliance with the Water Board's laws and regulations. DTSC meets frequently with the RPs for project management, maintaining timelines, and for the advancement of SSFL cleanup activities.

DTSC informs the public about the status of SSFL cleanup activities by maintaining project webpages with frequent updates about interim cleanup activities and project milestones - including a recent e-blast to the project list-serve to announce a new SSFL webpage with air quality monitoring data for the interim cleanup at the Area I Burn Pit.

Completed & Interim Cleanup Activities

Several critical soil cleanups and the removal of several buildings in Area IV have been completed. Two significant Boeing soil cleanup actions are currently underway at SSFL under Imminent and Substantial Endangerment Orders (Orders). The Orders require cleanup of the Former Shooting Range and the Area I Burn Pit. Excavation at the Shooting Range started in June 2023 and is anticipated to be completed this summer. Excavation at the Area I Burn Pit started in March 2024 and is anticipated to be completed in December 2024.

Pursuant to the DTSC Conditional Approval of the Final Removal Action Work Plan (RAW) for the Area I Burn Pit, the emergency cleanup work underway at the Area I Burn Pit is an interim cleanup to address chemicals and radionuclides in soil. Additional cleanup of the Area I Burn Pit will be conducted as part of the final cleanup for the Boeing areas of responsibility pursuant to the 2007 Consent Order and the 2022 Settlement Agreement.

Final Cleanup Decision Documents

In June 2024, OLC provided Meyers Nave with the table below to inform your County of upcoming decision documents and anticipated public comment periods. This project timeline is available on DTSC's SSFL webpage at https://dtsc.ca.gov/santa_susana_field_lab/ssfl_whats_new/. DTSC is planning for robust public engagement to ensure that the community and stakeholders are well informed about the project cleanup activities, timelines for decision documents, and public comment periods.

DTSC will prepare the draft Statement of Basis documents describing DTSC's tentative remedy selection and identifying the cleanup standards for soil and groundwater at SSFL. DOE and NASA will prepare the draft Soils Remedial Action Implementation Plans for their respective areas of soil cleanup at SSFL. The DOE and NASA draft Soils Remedial Action Implementation Plans will require DTSC technical review and concurrence prior to being released for public review. The public will have the opportunity to comment on these documents and proposed remedies during DTSC's public comment periods. The table below provides the anticipated public comment periods for the relevant decision documents.

Responsible Party	Document	Anticipated Public Comment Period Start
Boeing	Draft Groundwater Statement of Basis	Winter 2025

Responsible Party	Document	Anticipated Public Comment Period Start
Boeing	Draft Soil Statement of Basis	Summer 2025
NASA	Draft Groundwater Phase 1 Statement of Basis	Fall 2024
NASA	Draft Groundwater Phase 2 Statement of Basis	Fall 2025
NASA	Draft Soils Remedial Action Implementation Plan	TBD ¹
DOE	Draft Groundwater Statement of Basis	Spring 2025
DOE	Draft Soils Remedial Action Implementation Plan	TBD ¹

For additional awareness, a Statement of Basis is a document that succinctly describes the basis for DTSC's tentative remedy selection and identifies the cleanup standards.

The draft Statement of Basis does not select the final remedy, it describes the proposed remedy. This allows for additional information to be considered during the public comment periods. After consideration of all public comments, DTSC will issue a response to comments and approval of the remedy determination in a final Statement of Basis. The Statement of Basis:

- Describes the nature and scope of the site investigation:
- · Describes the remedies that were considered;
- Identifies and discusses the remedies proposed for selection;
- Explains the reasons for selecting the proposed remedies;
- Solicits public review and comments on the proposed remedies; and
- Provides information on how the public can be involved in the remedy selection process.

DTSC agrees that the public needs reassurance that the SSFL cleanup activities and decisions are determined by technically accurate information, and in an open public process involving the community and local government.

¹ The Soil Remediation Action Implementation Plans dates will be determined following the submission of data by NASA and DOE associated with their ongoing backfill and laboratory evaluation studies.

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If you have any questions regarding this letter or would like to schedule a call to discuss it, please contact me via email at Meredith.Williams@dtsc.ca.gov or by telephone at (916) 322-0504.

Sincerely,

Meredith Williams, Ph.D.

Director

Department of Toxic Substances Control

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