| | |
|---|---|
| **From:** | Brian Lindquist |
| **To:** | MSFC-SSFL-EIS |
| **Subject:** | Fw: email to NASA |
| **Date:** | Monday, September 16, 2013 3:38:30 PM |
| **Attachments:** | SCFS_SSFL_DEIS_comments.pdf |

---

----- Forwarded Message -----
**From:** Daniel O Hirsch <dhirsch1@cruzio.com>
**To:** Brian Lindquist <b490403@yahoo.com>
**Sent:** Monday, September 16, 2013 11:49 AM
**Subject:** email to NASA

To: msfc-ssfl-eis@mail.nasa.gov
From: Brian Lindquist, Southern California Federation of Scientists

Re: Comments on SSFL Draft EIS

Please find attached the written statement of the Southern California Federation of Scientists regarding the NASA Draft Environmental Impact Statement for the cleanup of NASA's portion of the Santa Susana Field Laboratory.

Brian Lindquist
Southern California Federation of Scientists

Statement of
The Southern California Federation of Scientists
at NASA Hearing on the
Draft Environmental Impact Statement
for the Cleanup of the NASA Portion
of the Santa Susana Field Laboratory
August 28, 2013

My name is Brian Lindquist and I am appearing here today on behalf of the Southern California Federation of Scientists (SCFS). SCFS was organized in the early 1950s as the Los Angeles Chapter of the Federation of American Scientists. SCFS is an interdisciplinary organization of scientists, engineers, technicians, and scholars dedicated to providing independent scientific and technical analyses and expertise on issues affecting science, society, and public policy. SCFS has been involved in matters related to SSFL since 1979, when it provided technical assistance related to disclosures of the partial nuclear meltdown that occurred in 1959 at SSFL. For over thirty years, SCFS has been involved in providing technical assistance to the communities near the site on matters related to cleanup of the SSFL chemical and radioactive contamination from decades of rocket and reactor testing. A member of our Executive Board, Dr. Sheldon Plotkin, who unfortunately cannot be here tonight, has served for approximately two decades as a community representative on the SSFL Inter-Agency Work Group overseeing the cleanup of the site and on the SSFL Advisory Panel that oversees health studies of the affected workers and neighboring communities.

SSFL is heavily contaminated from decades of rocket and reactor testing, sloppy practices, improper waste disposal, spills and releases. We are here focused on NASA's portion of the property—Area II and NASA section of Area I. Decades of gross violation of fundamental environmental rules led to contamination of soil, structures, groundwater, and surface water. Indeed, the draft EIS discloses NASA's estimate that its poor practices led to contamination of half a million cubic yards of soil alone. Contaminants include various extremely toxic dioxins, PCBs, numerous heavy metals, TCE and other Volatile Organic Compounds, perchlorate, and other hazardous materials.

Perchlorate, a component of solid rocket fuels that disrupts human development, has been found to have migrated offsite and contaminates a third of wells in Simi Valley monitored for it. Half a million gallons of TCE, a carcinogen, were dumped directly onto the ground and now contaminate groundwater; TCE has also migrated offsite. Annual monitoring reports for surface water contamination show rain carrying off toxic materials offsite, at levels exceeding health-based benchmarks, hundreds of times in recent years. A study by the UCLA School of Public Health found elevated cancer death rates among both the nuclear workers and the rocket workers from exposures to these toxic materials. Another study by UCLA found that the rocket testing had led to offsite exposures to hazardous chemicals by the neighboring population at levels exceeding EPA standards. A study performed for the Agency for Toxic Substances and Disease Registry found elevated cancer rates in the offsite population associated with proximity to SSFL.

The remarkable fact about NASA's Draft Environmental Impact Statement on the cleanup of the toxic contamination at its portion of SSFL is that there is almost nothing in the EIS about the toxic contamination. Just a few sentences. Hundreds of pages are spent trying to scare people about a few trucks per hour that will be needed to transport the waste to an appropriate waste disposal facility—far fewer trucks than were going in and out of the facility for decades. But virtually not a word about the toxic contamination that necessitates the cleanup. This is a fundamental flaw that must be corrected.

The draft EIS identifies the impacts of cleaning up the contamination but is essentially silent on the impacts of not cleaning it up—the "No Action Alternative." You focus on matters which in the scheme of things are small and leave unaddressed the tremendous amount of contamination your sloppy environmental practices created. The draft EIS creates an impression of an agency that signed a legally binding agreement to clean up the toxic mess it made but is now trying to get out of the solemn commitments entered into.

SCFS's recommendations, thus, are:

1. Provide extensive, detailed description of the contamination NASA's poor practices created over decades. Identify in detail what the site characterization has found as to what contaminants are found, in what concentrations, in what areas, in each environmental medium. Give us solid details about the groundwater contamination. Tell us about each violation or exceedance of surface water discharges leaving the site with contaminants about benchmarks. Detail which dioxins have been found, in what concentrations, in what soil, and to what depth; and the same for all the other toxic materials found.

An EIS about toxic cleanup that is silent about the toxic materials is misleading and unscientific at best. Not cleaning up the toxic contamination would result in perpetual releases of contaminants from the site, whenever the wind blows, carrying resuspended toxic material to the communities nearby; whenever the rain falls, surface runoff will continue to carry hazardous material offsite at levels that are deemed unsafe.

2. As to the impacts of cleaning up—very much manageable in the scheme of things—require:

a. the use of natural gas- or electric-powered trucks so as to reduce particulate and greenhouse gas emissions.

b. Disperse the trucks up among the several available routes, which should result in only two or three trucks per hour per road, and only in primary working hours. This is trivial, given the large number of trucks that have gone in and out during all the years of operations and still do for the existing cleanup.

c. Use on-site soil wherever possible for re-grading the cleaned up areas. There should be no need for offsite soil. But if there is some such need, use for bringing in soil the otherwise empty trucks that are going to the site to pick up waste, reducing further the number of trips needed.

d. Use in-situ treatment wherever possible. The draft EIS makes clear that this could reduce the soil removed and the truck trips by a huge amount, on the order of a third. Use on-site treatment to the maximum extent possible.

3. But, at the end of the day, the toxic contamination is so much of a health problem, including to neighboring communities irrespective of eventual end-use of SSFL itself because the contamination otherwise would keep migrating offsite, that full cleanup is scientifically and environmentally mandatory. A few trucks an hour, not dissimilar to what has long gone in and out of the facility anyway, is just a red herring to divert attention from the massive contamination of the site and the need to clean it up.

NASA signed a legally binding Administrative Order on Consent (AOC), committing to cleanup its contamination to background. NASA should fully live up to its commitments. It contaminated this site in the middle of these communities; it promised to fully clean it up; it must meet its promises, fully, and without equivocation.

Thank you.