

From: [Diana Dixon-Davis](#)
To: [MSFC-SSFL-EIS; Diana Dixon-Davis](#)
Subject: Response to NASA-DEIS re LUT,Health Risks, 7 CU Levels
Date: Monday, September 30, 2013 9:45:02 PM
Attachments: [2013.09.26 DDD DEIS LUT Comparisons, Health Risk Assesments.doc](#)

Dear Mr. Elliott,

Please find attached one of my responses to the NASA-DEIS.

This letter deals with Health Risks, 7 levels of Cleanups,
LUT, and misc suggestions.

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Mr. Allen Elliott
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Draft Environmental Impact Statement for Demolition and Environmental Cleanup
Activities for the NASA-administered portion of the Santa Susana Field Laboratory
(SSFL), Ventura County, California, dated July 2013

Dear Mr. Elliot,

In order for the decision makers and the public to better understand the nature of the Clean up to Background (CUB) and have accurate information for making decisions and to do realistic cost/benefit analysis the following points below need to be added to the DEIS.

If the reason for a cleanup of the SSFL is to reduce the health risks to the community around the SSFL, then **the current level of risk of the SSFL to human health must be measured**, and then the benefits of cleanup can be estimated. Without this basic piece of information, no valid decision making can be made. No decision made today can rewind the clock and fix health risks that occurred in the past and are no longer extant today.

In addition, a cost/ benefit and health-risk based re-evaluation of the all cleanup proposals based on the ultimate use of the SSFL and NASA sites must be added to the DEIS. Many of my thoughts are also presented in Paul Martin's, Office of Inspector General Report, 14 February 2013, NASA's Environmental Remediation Efforts at the Santa Susana Field Laboratory, Report no.IG-13-007. This analysis should be included in the DEIS documents section to aid decision makers.

Furthermore, there needs to be a summary/cumulative assessment made which combines the singular impact (NASA) and cumulative impacts (remainder of the SSFL i.e.Boeing, DOE Site) and the effects of Cleanup to Background (CUB) on Health Risks—current and future, and those caused by CUB and if finally presented, each one of the proposed cleanup standards and proposals..

Suggested Improvements and Correctable Omissions from the DEIS

1. **REPLACEMENT SOIL CONSIDERATIONS** Before any decisions are made, fill dirt at an acceptable level of “cleanliness” must be identified. The soil must be available in sufficient quantity and at an acceptable price to satisfy the selected cleanup strategy. **Replacing “contaminated” soil with more contaminated soil is an unacceptable alternative.** The surrounding community expects 100% replacement with CUB safe soil, and within the fiscal restraints set by the Federal Government.

1.a. This requirement for identifying acceptable quantity and quality of fill soil must be met before any cleanup strategy is selected. The quantity and quality availability of “clean” replacement soil that meets the current required background values (CUB Levels) , uncontaminated, and matching current soil structure, without non-native species, and suitable to support local flora and fauna, must be identified. Until this basic requirement is met, no selection of alternative cleanup strategies should be made.

1.b. Once acceptable fill soil is identified and quantified, then CUB soil removal can be considered; prioritized as to “most contaminated” to least “contaminated” areas. Once the **supply of “clean replacement soil” is used up, no more soil removal should occur** . Other cleanup strategies will need to be employed. This is why multiple strategies and cleanup levels must be studied and presented in the DEIS (See 2.0 below).

1.b. **The DEIS currently only proposes replacing 1/3 of the soil removed.** This is also an **unacceptable solution**. Improper restoration of the physical environment will lead to many unwanted consequences such as: increased water run off, erosion, insufficient soil to support local flora and consequently local fauna. (ES-5.1.1)

1.c. Because the top 2 feet of soil is deemed non-treatable by the DEIS, it will under the current DEIS all be removed. **This is an unacceptably rigid standard.**

2. **COMPARISON TABLE OF 7 CLEANUP STANDARDS** There needs to be a revision of the NASA DEIS which will, at a minimum, include the standard 6 alternatives between “Do Nothing” plus the Look up Tables (LUT) “Cleanup to Background” (CUB) levels for the approximately 450 trigger point chemicals and compounds . To my knowledge all other EIS evaluation for major projects done for California and all other states include these varied standards. Exclusion of these intermediate evaluations for only the NASA/ DEIS raises serious questions as to its even minimal usefulness.

2.a. The full range of alternatives considered must , at a minimum, include the 6 standard DEIS alternatives. A realistic evaluation of how this site will be used in the future is required. (Are future owners seriously planning to farm this land with its topography and lack of water ?) The Look Up Table values for each chemical/compound need to be compared to each of the 6 Standard EIS Cleanup Levels.

Table to be Added: 6 Standard EIS Cleanup Levels
Compared to Look-Up Table Values:

1. Do Nothing,
2. Clean up to Agriculture Standards
3. Clean up to Rural Residential Standards,
4. Clean up to Urban Residential Standards,
5. Clean up to Industrial Standards,
6. Clean up to Parkland Standards .
7. Look Up Table Values (CUB)

2.b. . For every chemical and compound to be tested for, an extended Tables must be added for (at least) the 6 Standard EIS Alternatives which must show the usually used and accepted Federal and State detection contamination/concentrations expected to achieve that standard of cleanup.

2.c.. The known or postulated health risk to the community must be calculated and shown for each of the 7 Standard EIS Alternatives for each chemical to be tested for.

3. HEALTH RISK ASSESSMENTS The current existing total level of health risk to the community that the current SSFL site poses (as is, before cleanup) must be calculated and compared to the postulated “improvements” resulting from the CUB cleanup, in order to see if cleanup achieves a measurable level of improvement to public health.

3.a . Health Risk evaluations must include all realistic ,on-site and off-site risks. The DEIS can not ignore the effects on the surrounding community and on the populations living along the haul routes and proposed dump sites. These health risks include, among others, air pollution, traffic, water usage and run-off, dust exposure, Valley Fever (sometimes lethal fungus infection endemic to area), truck and employee accidents. An analysis of and monitoring of the level of “contamination” in the streams leaving the SSFL site (Bell Canyon, Black Canyon, and all other ”blue line” streams) must be done to see if retaining and treating ground and surface water on site is still feasible and required. The lack of information on air pollution caused by CUB projected truck traffic, especially in Woodland Hills, Canoga Park, and Chatsworth is a serious omission. Especially children and adults, will bear heightened health risks.

3.b. The amount of reduction in health risk to the community that each of the 7 alternatives will achieve must be calculated. The total cost to achieve each alternative must be calculated.

3.c. A re-evaluation must be done of the criteria that any one of the 450 chemicals can trigger a cleanup of an area on the site. The actual level of health risk of this one “trigger” must be weighed against the cost to the environment, etc. of this extreme interpretation of cleanup criteria. Arsenic occurs at a naturally high level and is already “exempted” in some cases from triggering total soil removal.

3.d. Under the current LUT and CUB, measuring ¼ of a banana and 1/16 tsp.(a few drops) of beer would qualify soil as contaminated and require removal to a “hazardous” waste site. These levels of Cleanup stain credulity and require a health risk based evaluation.

4. **Evaluation of the cost/benefits of slower but equally/ almost as effective remediation alternatives** such as phytoremediation (plant based), treat soil and water in place, encapsulation of contaminated soil, and natural attenuation must be done. There is no requirement that the SSFL Cleanup be completed by a date certain, only a politically set date. (ES-3.1.2.2)

5. **Consideration of differential/ alternative cleanup treatments for different areas** within the site must be evaluated. This consideration must be done in regards to the Chumash religious and cultural areas and the Test Stand areas so that these historical sites are preserved and not destroyed or altered by the cleanup process.

6. **Consideration of the ultimate use of the SSFL** as a park and then work backward to re-evaluation of the health risks and the cost/benefits of the entire cleanup with this outcome in mind.

7. **Alternate uses for Federal Funds.** It is quite possible that the funds spent on the highest level of cleanup could be much more effectively used for public health measures that would broadly benefit everyone living around the SSFL site. This might reduce health risks much more than CUB will do. See especially the current use of ground water and wells in the Simi Valley area. NASA and the Federal Government must decide how much money will be spent on this project and to what benefit., especially when many other cleanup projects go unfunded.

IN SUMMARY A cost/ benefit should be done to analyze costs associated with CUB cleanup versus costs to the surrounding community of truck traffic, damage to environment, and destruction of historical and cultural treasures. These costs must be weighed versus currently unknown community health benefits of CUB on site. Cleanup to Parkland Standards also has the very high and known benefits of a large park connecting the Santa Monica Mountains National Recreational Area, through the Rim of the Valley (proposed National Park) , Santa Susana State Historic Park, with the Santa Clarita Woodlands Park, and the Angeles National Forest.

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