

Statement of
The Southern California Federation of Scientists
at DOE Scoping Hearing for the
Draft Environmental Impact Statement
for the Santa Susana Field Laboratory
March 1, 2014

The Southern California Federation of Scientists focuses our comments today on a deeply questionable document released by DOE as part of this scoping process that raises troubling questions about the scientific integrity of the process, and which creates further appearance of an effort to try to get out of the obligation to clean up the contamination at SSFL. We refer here to the document “Rough Order of Magnitude Estimates for AOC Soil Cleanup Volumes in Area IV, and Associated Truck Transport Estimates based on DTSC Look-up Table Values.” It is an extraordinary document.

A note of background: The Boeing Company in particular, and other Responsible Parties as well, have been trying to wriggle out of their cleanup responsibilities by, to be candid, hyping, exaggerating, and otherwise propagandizing about how many trucks they claim it would take to do the cleanup. One would think that that argument would only further reinforce the public understanding of the magnitude of the environmental harm the Responsible Parties have done at the site, that they have contaminated so much soil. Of course, leaving massive amounts of contamination not cleaned up would be a vastly greater problem than the inconvenience of some trucks, but it remains the PR game plan.

DOE has now issued the afore-mentioned soil volume and truck estimates. But in fact DOE did not prepare them. Dixie Hambrick and two colleagues from MWH did. MWH is Boeing’s prime contractor at

SSFL to provide support for Boeing's arguments it should be relieved of most of its cleanup obligations, and Ms. Hambrick has been key to that work. Indeed, the Hambrick et al. memorandum is cc'd to the Boeing official for whom they work and to whom they report, Dave Dassler. In short, this is not a scientific review by DOE or by an independent scientific group, but appears to be a piece of advocacy paralleling Boeing's efforts to avoid cleanup.

It is therefore not surprising that the report asserts that the amount of contaminated soil needing remediation in Area IV of SSFL could be many three to five times higher than previous estimates. If any reporters are present here today, this should be headline news: DOE ANNOUNCES IT CONTAMINATED UP TO FIVE TIMES AS MUCH SOIL AT SSFL WITH TOXIC WASTE AS PREVIOUSLY DISCLOSED. Thus, if the estimates were valid, they would show an even greater necessity to clean up the polluted site.

But, of course, the estimates are not accurate, but highly inflated in a fashion that meets the interests of Boeing and apparently those within DOE trying to break out of cleanup obligations. So how did they go about so severely inflating the figures? Here are some examples:

- They added 30% to all soil volumes by assuming it would fluff up when dug up. 20% increase in volume can result, not 30%; and indeed, NASA stated at the Work Group meeting that they had considered using 20% but in fact chose not to include any fluff factor at all in their EIS. But whether it is 20 or 30% in the end is irrelevant, because one would re-compact the soil anyway as it is placed in the truck or train car so as to keep the number of shipments and transport and disposal costs down. This 30% fudge factor used by MWH to inflate the volumes is thus fictional.
- Where there was a surface drainage or channel that had more than one soil sample that was contaminated, they assumed most or all of the entire drainage or channel would have to be dug up even if there was no evidence those other areas were

contaminated. This is nonsensical, but aimed solely at skewing the result dramatically upward.

- They assumed one would remove all soil down to bedrock in those drainages or channels, even if there was no evidence the contamination went nearly that far.
- If a pond or large surface water area had several samples in one location showing contamination, they assumed all of the soil in the entire pond or area would be removed, even if the rest of the area had no evidence of contamination.
- They assumed the entire soil area would be removed out to bedrock outcrops, even if there were no evidence of contamination anywhere near there.
- In areas where there was more than one soil sample that showed contamination at particular locations in those areas, they assumed the entire large footprint where historical activity occurred would be dug up, even if there was no evidence in significant portions of that large area that there was contamination.
- And they assumed one would remove throughout those areas all soil down to where the deepest single instance of contamination was found, even when all the other measurements in other parts of the area showed far more shallow contamination.
- They assumed one would dig up soil that had been found to have no contamination but which had geophysical indications that non-contaminated items might possibly be underground.
- They assumed there would be no soil excluded from remediation for any of the exceptions built into the AOC—endangered or threatened species, Native American artifacts, or unexpected problems. All of these would reduce the soil volumes.
- And they assumed there would be no *in-situ* treatment of contaminated soils, which eliminates the need to remove them. NASA, for example, assumes up to a third of

contaminated soils could be so treated.

Then, to top it all off, MWH went ahead and inflated matters further, to come up with a second, even more “upper range case.” For this, it assumed that vast areas where no contamination had been found would be dug up anyway. (Showing the bias further, we note that there is no “lower range case” provided.)

This is not science; this is not disinterested technical analysis; this is mangling data for a predetermined outcome. The report should be withdrawn and DOE commit itself to honest science for its EIS and living up to its AOC cleanup commitments, not working to get out of them.

We should make one other critical point. Whatever the true amount of contaminated soil, it needs to be fully cleaned up. If indeed DOE contaminated much more soil than it has previously admitted to, then that soil needs to be cleaned up, to background, as required by the AOC. If, on the other hand, the MWH estimates are inflated, so as to help push for abandonment of the cleanup obligations, then honest estimates are needed, but in ANY case the cleanup commitments solemnly entered into by DOE in the AOC should be fully honored and carried out. DOE caused substantial radioactive and chemical contamination by its decades of inadequate environmental controls, resulting in a partial meltdown and numerous other accidents. It entered into a binding agreement to remediate all contamination that could be detected. It must live up to its commitments.