

**From:** [Abe Weitzberg](#)  
**To:** [Kracov, Gideon@DTSC](#); [Campbell, Arezoo@DTSC](#); [Vizzier, Mike@DTSC](#)  
**Cc:** [Erreca, Erik@DTSC](#); [Rohlfes, Larry@DTSC](#); [Lee, Barbara@DTSC](#)  
**Subject:** RE: SSFL Cleanup Information  
**Date:** Thursday, April 21, 2016 4:02:48 PM

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*DTSC IRP Chair and members,*

*Coincidentally, today I received notice of your second report and read it with interest, focusing on items relating to the remediation of SSFL. I noted the following:*

2. At the February 2017 IRP meeting, DTSC should provide IRP with an oral presentation in collaboration with the Department of Public Health on disposal requirements for radioactive waste that is above background levels. The presentation should include a discussion of the disposal of radioactive and mixed waste from the Santa Susana Field Laboratories in Simi Valley.

*I suggest that the data request to DTSC be modified to include the basis for defining radioactive waste to be quantities above background, which is a requirement unique to the DOE and NASA portions of SSLF under the 2010 Agreements. The actual requirement as written is 'above background or detect,' and is applied to no other location in the US or the world. It is independent of risk, which should be the primary requirement for any remediation activity. This definition which is also applied to chemical contaminants is the primary source of conflict regarding the cleanup and will cause excessive damage to the environment and the health of surrounding communities while substantially increasing the cost and duration of the remediation activities.*

*Thank you,*

*Abe*

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**From:** Abe Weitzberg [mailto:[aweitzberg@att.net](mailto:aweitzberg@att.net)]  
**Sent:** Thursday, April 21, 2016 11:18 AM  
**To:** 'gideon.kracov@dtsc.ca.gov'; 'Arezoo.Campbell@dtsc.ca.gov'; 'Mike.Vizzier@dtsc.ca.gov'  
**Cc:** 'erik.erreca@dtsc.ca.gov'; 'larry.rohlfes@dtsc.ca.gov'; 'Lee, Barbara@DTSC'  
**Subject:** SSFL Cleanup Information

DTSC IRP Chair and members,

Last night, I learned that in several of the meetings of the IRP, information relating to the cleanup of

SSFL was presented to you. Today, I went to your website and read the SSFL-related portion of the minutes of your December meeting (below) and the February 9, 2016 document provided by Denise Duffield.

***“Holly Hoff, Denise Leffler, and Cindy Gortner made a presentation entitled: The Santa Susana Field Laboratory: A Case Study in DTSC Failures. A PowerPoint version of this presentation is available on the IRP website at***

***[https://www.dtsc.ca.gov/GetInvolved/ReviewPanel/upload/IRP\\_SSFL-Presentation\\_12-18.pdf](https://www.dtsc.ca.gov/GetInvolved/ReviewPanel/upload/IRP_SSFL-Presentation_12-18.pdf)***

***The presenters stated that contamination has migrated offsite from a one-time rocket and nuclear-testing facility, and the area is now inhabited by half a million people within 10 miles of the facility. The responsible parties are the Department of Energy, the National Aeronautics and Space Administration (NASA), and Boeing. Administrative Orders on Consent were signed in 2010 between DTSC, the Department of Energy, and NASA to clean up contamination. At the time DTSC promised it would require Boeing to clean up its part of the contamination. However, Boeing did not sign the agreement and recently submitted a proposal that would not address 98 percent of the contamination. Boeing urged the creation of a DTSC-sanctioned Citizens Advisory Group (CAG), which it offered to fund. The presenters alleged that CAG meetings are designed to limit public participation. The presenters also stated that Boeing is disposing of radioactive waste to facilities not licensed to receive such waste.”***

I am concerned that you might form your opinions and make recommendations based solely on this and similar information. It is an understatement to state that the information is biased and technically incorrect and that ad hominem attacks on individuals and the SSFL CAG are without merit. This kind of misinformation has been widely publicized for over 30 years by a loose confederation of groups such as the Rocketdyne Cleanup Coalition, Committee to Bridge the Gap, and Physicians for Social Responsibility. They selectively cite data and analyses, misinterpret them, and then make broad conclusions about the risk of contamination from SSFL and the need for a severe cleanup. It is easier for them to make the claims, than it is for me or anybody else to document their errors and refute the claims.

However, I believe that you need to be apprised of the whole story; not just their version of it. A simple example of the misinformation is the statement:

## **“Contaminants of Concern**

**Radionuclides:** cesium-137, strontium-90, plutonium-239 and tritium, among other radioactive materials. In 2012, the EPA found radiation in hundreds of samples at SSFL, in some places over 1,000 times background. Radionuclides are very dangerous because of their high toxicity and very long half-life.”

The truth is that only one sample, cesium-137, was found to be 1000 times background. It had been identified previously, and because it was under an asphalt road its removal had been postponed until the final cleanup. The risk from this source was such that if you lay on top of it for two weeks, you would get the same dose as a round trip airplane ride to New York. The radionuclides that are

found at SSFL are not toxic, and pose no risk to individuals on- or off-site. Only twelve test locations had levels above those required to meet suburban residential standards. Radionuclides are only a very small portion of the contamination at SSFL, but their presence is used to engender fear.

The bottom line regarding SSFL is that while there it does have some contamination, such contamination has not and does not pose a risk to off-site locations. This has been repeatedly stated by CDC/ATSDR, DTSC, and EPA. DOE, NASA, and Boeing are committed to a protective cleanup of SSFL. The DTSC regulators are technically competent and are able to properly oversee the SSFL cleanup when they are free from political interference. I believe that the attention of the IRP should be directed to those locations in California where there is risk to the public, and SSFL should be relegated to an appropriate priority based on its real risk, not the perceptions of some.

I request an opportunity to present the other side of the story at a convenient time when you are in Southern California. I am an 80 year old mostly retired nuclear engineer who has been involved with the SSFL cleanup as a stakeholder since I moved back to the area eleven years ago. I worked on reactors at SSFL from 1962 to 1965. I have three degrees from MIT and can technically support any statements that I make. I am a member of the SSFL Community Advisory Group. We are all volunteers and beholden to no one.

Thank you,

Abe

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