



The Boeing Company
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February 22, 2016
In reply, refer to SHEA-115395

Sheila Kuehl
Supervisor, Third District County of Los Angeles
821 Kenneth Hahn Hall of Administration
Los Angeles, CA 90012

Mitchell Englander
Los Angeles City Councilman
9207 Oakdale Ave
Chatsworth, CA 91311

Fran Pavley
Senator, 27th District
5016 N. Parkway Calabasas, Suite 222
Calabasas, CA 91302

Re: Letter of December 14, 2015 From Supervisor Kuehl, Councilman Englander, and Senator Pavley to Barbara Lee, Director California Department of Toxic Substances Control

Dear Supervisor Kuehl, Councilman Englander and Senator Pavley:

We appreciate your interest in the former Santa Susana Field Laboratory ("Santa Susana"). We understand some people continue to have questions and concerns about the cleanup of the former Santa Susana Field Laboratory and whether past facility operations have affected the health of the local community. We would like to take this opportunity to clarify any confusion about Boeing's cleanup and future land use commitments at Santa Susana.

Boeing has made significant progress investigating, cleaning up and restoring Santa Susana. We have already removed a substantial amount of contaminated soil under the direction of two state agencies. We installed state-of-the-art treatment systems for cleaning groundwater and improving stormwater quality. We are ready to move forward and finish the soil cleanup to fulfill our responsibilities outlined in the 2007 agreement, as soon as the final remedy is selected by the state.

We remain as committed today as we were in 2007 to preserving our 2,400 acres at Santa Susana as undeveloped open space. As part of the cleanup, we will restrict our property so it will never be used for residential, commercial, industrial or agricultural purposes. Our commitment ensures that the cleanup protects people while also protecting the unique and valuable ecosystem to benefit wildlife and the community.

We would like to bring to your attention inaccuracies in your letter on this topic dated December 14, 2015. In the spirit of achieving a fully protective cleanup, it is important to correct these inaccuracies to ensure the community is receiving fair and accurate information. In order to assure that all interested parties are deliberating with the most accurate information regarding Santa Susana, we would welcome the opportunity to meet with you to discuss these issues in greater detail.

1. Investigations and Risk Assessments are Comprehensive

Boeing is required by the Department of Toxic Substances Control (DTSC) to perform a comprehensive and thorough investigation of its portion of Santa Susana to determine the extent of contamination and risks that would be present in the absence of remediation, and to then craft a fully protective cleanup based on the most likely actual future land use.



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Boeing recently submitted two reports that are the culmination of two decades of comprehensive and thorough investigation directed by DTSC, including thousands of soil and groundwater samples. The sample results were evaluated using widely accepted scientific processes to assess the potential risks for a range of different land use scenarios, including evaluation of future uses that will never occur at the site. The assessments were then used to identify and delineate all areas that require cleanup in order to be fully protective of human health and the environment *in light of the actual reasonably foreseeable future land use*.

As part of this process, the reports also identify areas that do not require cleanup (no further action). The reports recommend no further action in areas with less than one in one million cancer risk (excluding contributions from background chemicals or areas where there are no site-related impacts). One in one million excess cancer risk is the standard applied by DTSC in California and the most stringent standard applied by the US Environmental Protection Agency throughout the country to determine areas needing cleanup versus areas not requiring any further action.

Boeing is committed to a full cleanup, consistent with the future undeveloped open space land use, and that is fully protective of human health and the environment. The methods and approach for defining the cleanup were approved by DTSC and are documented in the 2007 Consent Order for Corrective Action. Boeing's cleanup will result in removal or treatment of all contamination necessary to achieve the goal of protecting human health and the environment beyond the future land use as undeveloped open space. Boeing's commitment is consistent with that of DTSC, which recently stated:

DTSC is committed to a fully protective cleanup of the Santa Susana Field Lab site with orders in place requiring the three parties responsible ensure that protective standards will be met. DTSC will hold Boeing to the Consent Order of 2007.

2. Future Land Use will be Undeveloped Open Space—There Will Never be “Backyard Gardens”

Boeing will restrict future land use at Santa Susana to prevent development for any commercial, industrial, agricultural, or residential purpose to ensure the future land use is undeveloped open space and recreational use. Furthermore, Boeing has committed to cleaning up the site to a standard approximately *10 times more protective* of human health than that applicable to open space uses. This standard is equivalent to the suburban residential standard that is generally applied in California by DTSC. It is worth noting that the suburban residential standard does not generally presume use of backyard gardens. Boeing has never committed to a cleanup that assumes the use of “backyard gardens” because there will never be such gardens on the site.

At its September 8, 2015 public meeting on Risk Assessment, DTSC's supervising toxicologist presented a detailed explanation of the risk assessment process and a depiction of the Suburban Residential Risk Scenario (“slide 33”, attached). DTSC has clearly stated that they do not normally presume consumption of produce from a home garden in estimating risk for suburban residential future land use and that upon completion of a cleanup under that suburban residential standard, DTSC would consider the property released for *unrestricted* use. Consideration of backyard gardens deviates from DTSC's standard suburban residential risk assessment practice. Further, Boeing will impose legal protections that bar development of the property and prohibit residential houses, backyard gardens, or use of groundwater wells for drinking water.

In regard to Ventura County zoning restrictions, while zoning and land use plan decisions are means by which local governments can impose controls on property, individual owners like Boeing can impose additional restrictions and protection. Boeing will restrict future land use to ensure the property will be protected as undeveloped open space, regardless of zoning changes beyond our control.



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Thus, not only would consideration of backyard gardens deviate from DTSC's standard suburban residential risk assessment practice, Boeing will impose legal protections that bar development of the property so there will never, ever be houses, backyard gardens, or use of groundwater wells for drinking water.

3. Risk Assessment Clarification

With respect to hypothetical risks noted in your letter, you appear to refer to risks calculated for residential land use with backyard gardens *prior* to any cleanup being performed. A risk assessment calculates risks for a large range of hypothetical land use scenarios, regardless of the actual future land use, and includes risk from background chemicals (referred to as "Total Risk" in the reports) for comparison only.

For example, your letter references a location where risk estimates are stated to be as high as one in five. It is important to clarify the meaning of this calculation. First, the risk assessment refers to hypothetical risks that might exist *prior to any cleanup* being performed, and for residential land use that includes a backyard garden. Second, risks at the locations your letter references *are primarily attributable to naturally occurring arsenic* and not related to past site operations. The risk posed by naturally occurring arsenic would not be required to be cleaned up at any site, even under a background-level cleanup standard. (Nor, of course, would open space users encounter this level of hypothetical risk.) If the contribution from naturally occurring arsenic is excluded, the hypothetical risk (excluding backyard gardens) following cleanup at this location would be one in one million or less, as documented in the reports.

In another example, your letter references a location where risk estimates are stated to be as high as one in three. Again, this reference, taken out of context, misstates the meaning of this calculation. The risk assessment refers to hypothetical risks that might exist *prior to any cleanup* being performed and *are primarily attributable to naturally occurring arsenic*. The hypothetical risk following cleanup at this location, would be one in one million or less, a point also documented in the reports.

Your letter references another location where risk estimates are described as high as 96 in 100. The letter again refers to hypothetical risks that might exist *prior to any cleanup* being performed, and for residential land use that includes a backyard garden. This area will be addressed in Boeing's cleanup plan, and *following the cleanup, the hypothetical risk at this location to full-time residents (excluding backyard gardens) will be three in one million, not 96 in 100*. The actual risks to open space users would obviously be even less than the three in one million.

4. No Offsite Threat to Human Health or the Environment

Over several decades thousands of soil, air, and water samples have been collected and analyzed in surrounding communities. DTSC has stated, "Based on the available data, there is no evidence of contamination from Santa Susana that poses an offsite threat to human health or the environment." (DTSC white paper, Nov 2015).

5. Boeing is Committed to a Fully Protective Cleanup

In summary, Boeing is committed to a cleanup that is consistent with the future undeveloped open space land use and that fully protects human health as well as the amazing natural and cultural resources at Santa Susana. The methods and approach for defining the cleanup were approved by DTSC and are stipulated in its 2007 Consent Order for Corrective Action. Boeing's proposed cleanup is consistent with the law and is based on the same methodology that is applied by DTSC, USEPA and other states to cleanups throughout the nation. Boeing's proposed clean-up will result in removal or treatment of all



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contamination necessary to achieve the goal of protecting human health and the environment given the property's actual future use as undeveloped open space.

We appreciate your long-time interest and commitment to the cleanup at Santa Susana. Boeing appreciates this opportunity to reiterate its commitment to a fully protective cleanup and to set the record straight. Again, we would welcome the opportunity to meet with you and discuss this matter at your earliest convenience.

Sincerely yours,

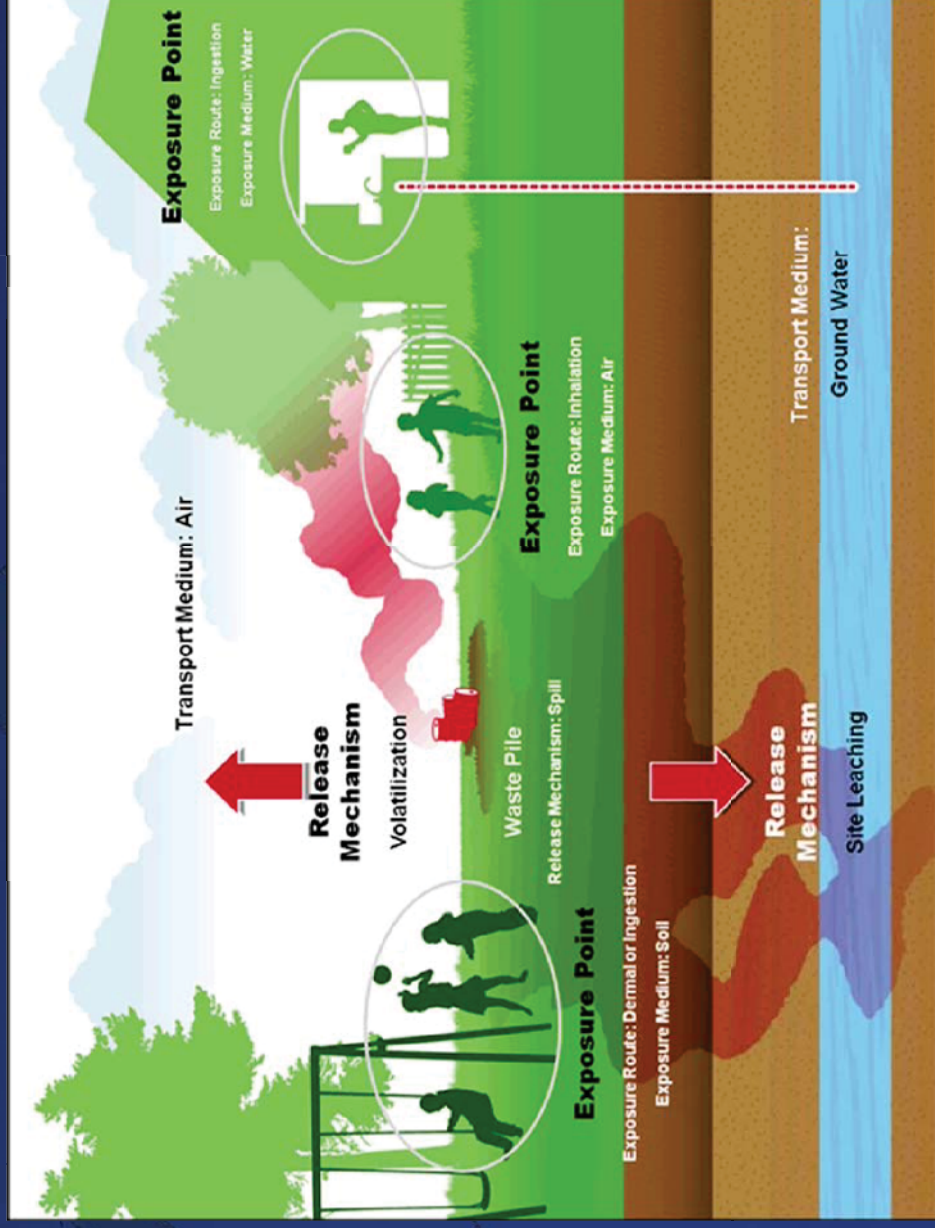
A handwritten signature in blue ink, reading 'SL Shestag', with a long horizontal flourish extending to the right.

Steven L. Shestag
The Boeing Company
Director, Environment
Santa Susana Site Executive

cc: Ms. Barbara Lee, DTSC Director
Hon. Edmund G. Brown, Governor of California
Hon. Dianne Feinstein, Member of the U.S. Senate
Hon. Barbara Boxer, Member of the U.S. Senate
Hon. Steve Knight, Member of the U.S. House of Representatives
Hon. Julia Brownley, Member of the U.S. House of Representatives
Hon. Scott Wilk, Member of the California State Assembly
Members of the Ventura County Board of Supervisors

Enclosure

Suburban Residential Exposure Scenario



“Unrestricted Use”