

DOE (U.S. Department of Energy), 2017b, Letter from J. Jones, Director of DOE ETEC, to R. Leclerc, Department of Toxic Substances Control, Division Chief, Brownfield & Environmental Restoration Program, "Identification of Backfill Soils Available to be used by the Department of Energy at the Santa Susana Field Laboratory, December 21.

Errata: the correct date for this reference is 2016.



Department of Energy
Energy Technology Engineering Center
4100 Guardian Street, Suite 160
Simi Valley, CA 93063

December 21, 2016

Mr. Ray Leclerc, PE
DTSC Division Chief, Brownfield & Environmental Restoration Program
8800 Cal Center Drive
Sacramento, CA 95826

SUBJECT: Identification of Backfill Soils Available to be used by the Department of Energy at the Santa Susana Field Laboratory

Dear Mr. Leclerc:

Appendix C of the 2010 Administrative Order on Consent (AOC) states: "if an onsite or offsite source of backfill soils that achieves all look-up table values cannot be reasonably found, then DTSC, DOE and USEPA shall enter a consultation process and DTSC shall determine the best available source of backfill." For the reasons stated below, pursuant to Appendix C of the 2010 AOC, the Department of Energy (Department or DOE) is requesting that this consultation process with the Department of Toxic Substances Control (DTSC) and the U.S. Environmental Protection Agency (USEPA) begin regarding the best available source of backfill soil for DOE's use for the soil remediation in Area IV and the Northern Buffer Zone of the Santa Susana Field Laboratory (SSFL).

DOE has completed its soil characterization, and its analysis of the volume of soil that needs to be removed based on this data. DOE has developed a Rough Order of Magnitude (ROM) range of the amount of soil removal required to meet the 2010 AOC. As communicated in DOE's February 7, 2014 Notice of Intent (NOI to prepare its Draft Environmental Impact Statement), to comply with the 2010 AOC, the range of soils to be potentially removed is from 1 million - 1.7 million cubic yards. DOE has determined it may need to replace approximately 750,000 cubic yards of the removed soil that must meet the stringent levels determined by DTSC in Look Up Table (LUT) values.

The 2010 AOC states that any backfill material used to replace soil removed as part of the remedial action must meet the chemical and radiological concentrations listed in the AOC LUT. This means that the concentration of any of the 116 chemicals and 16 radiological constituents listed in the LUT and present in backfill material must be less than the value presented in the LUT. DOE has looked at several sites that could potentially meet the backfill specifications in the 2010 AOC.

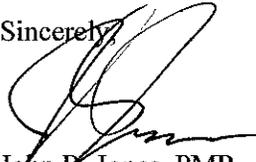
To determine whether a source of backfill material exists that would be consistent with the provisions of the AOC as specified in Attachment B, Final Agreement in Principle, and in Attachment C, Confirmation Protocol, DOE evaluated three potential borrow sites:

1. Gillbrand (a commercial borrow soil site), Simi Valley, CA;
2. Tapo Fill (a commercial borrow soil site), Simi Valley, CA; and
3. Malibu Lake Sediment (soil material that is dredged from Malibu Lake), Agoura CA.

Additionally, DOE purchased soil samples from two local home improvement stores and had the purchased soil analyzed to see whether the components of those samples were less than the LUT values developed by DTSC. Soil from all of the sites listed above and the fill soil from the local stores did not achieve LUT values, and therefore, this soil does not qualify as backfill usable by DOE in Area IV of SSFL. Thus, the challenge may be the impracticability to locate soils that readily meets the LUT standards and the unavailability of sufficient quantities to satisfy the backfill material requirements.

We look forward to the initiation of this important consultation process when mutually convenient for the three agencies. If you have any further questions, please give me a call at (805) 416-0992. The Department looks forward to working with you. Best Regards.

Sincerely,

A handwritten signature in black ink, appearing to read "John B. Jones", written over a horizontal line.

John B. Jones, PMP
Director of DOE ETEC

CC:

Mell Roy, DOE
Stephie Jennings, DOE
Simon Lipstein, DOE
Steven Miller, DOE
Mark Malinowski, DTSC
Laura Rainey, DTSC