

National Aeronautics and Space Administration

George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812



August 8, 2017

AS01

Mr. John Jones
Department of Energy
4100 Guardian Street, Suite 160
Simi Valley, California 93063

SUBJ: Clarification of NASA Backfill Comment on DOE Draft Environmental Impact Statement

Dear Mr. Jones,

The purpose of this letter is to respond to the Department of Energy's (DOE) request for clarification on NASA's comment #7 to the DOE Draft Environmental Impact Statement. I appreciate the opportunity to clarify NASA's position regarding backfill. Comment #7 was not intended to imply that NASA does not consider backfill a problem under the terms of the AOC. On the contrary, NASA shares DOE's concern. Locating backfill that meets 2010 AOC requirements, and in the sufficient volumes, is an issue for the implementation of the AOC.

NASA has tested soils from multiple possible offsite backfill locations in the region, and have found that all of these sites' backfill contain predominately a sand and gravel mixture with no materials capable of restoring the SSFL site to a pre-cleanup condition. DOE's findings that even store purchased topsoil fails to meet AOC Lookup Table values further highlights the problem. The AOC-based soil cleanup will require NASA to excavate over 100 acres of habitat, including 32 acres of sensitive habitats, with an estimated 600,000 to 900,000 cubic yards of soil requiring remediation or removal. To date we have not found a solution to this problem. The fact that there is not adequate backfill to carry out the restoration process poses significant challenges with implementing the AOC-based soil cleanup.

If you have any questions, please contact me at (202) 714-0896 or peter.zorba@nasa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Zorba", with a long horizontal flourish extending to the right.

Peter Zorba
NASA
SSFL Project Director

cc: Ms. Stephanie Jennings
Department of Energy

Ms. Amy Keith
NASA

Ms. Tina Norwood
NASA

Mr. Thomas Hayes
NASA