



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

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Edmund G. Brown Jr.
Governor

Responses to Comments
May 16, 2013
In Situ Chemical Oxidation Field Experiment
and draft Mitigated Negative Declaration.
Santa Susana Field Laboratory
Ventura County, California

Background

Public Participation Activities

On March 18, 2013, the Department of Toxic Substances Control (DTSC) issued a notice for the proposed In Situ Chemical Oxidation (ISCO) Field Experiment and draft Mitigated Negative Declaration. Public Comments were accepted by the DTSC between March 18, 2013 and April 18, 2013.

- The public notice was published in three newspapers: the Ventura County Star, the Acorn, and the Daily News.
- Hard copies of the draft ISCO Work Plan were placed in four (4) information repositories: Simi Valley Library, Platt Branch Library, California State University Northridge Oviatt Library, and the DTSC Chatsworth Regional Office.
- An electronic copy of the draft ISCO Work Plan was posted for review on the DTSC SSFL website at:
www.dtsc.ca.gov/SiteCleanup/Santa_Susana_Field_Lab/index.cfm.
- An electronic announcement regarding the draft ISCO Work Plan public comment period was sent to the SSFL e-list of 900+ subscribers.

A total of two (2) comment letters were received, and a list of commenters is provided below.

California Environmental Quality Act (CEQA)

DTSC has prepared a draft Mitigated Negative Declaration for the ISCO Field Experiment project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq] and accompanying Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq].

Responses to Comments

A. INTRODUCTION

The purpose of the ISCO Field Experiment is to collect field data that will aid in evaluating the effectiveness, implementability and cost of using ISCO as a technology for removing volatile organic compounds (VOCs) from the saturated bedrock of the Chatsworth Formation at the Santa Susana Field Laboratory (SSFL). The intent of the proposed ISCO Field Experiment is to introduce oxidant (potassium permanganate [KMnO₄]) in the Chatsworth formation to initiate an oxidation reaction with the VOCs, thereby converting the VOCs to carbon dioxide, water, and chloride ions. Results from the proposed ISCO Field Experiment will be used in the Corrective Measures Study that will be conducted to identify a site wide groundwater remedy for SSFL.

B. LIST OF PARTIES COMMENTING ON THE ISCO FIELD EXPERIMENT WORK PLAN

Private and Local Organizations

William Preston Bowling, Aerospace Contamination Museum of Education,
April 18, 2013

Individuals

William Vettinghoff, March 28, 2013

LETTER NUMBER 1

Paulson, Roger@DTSC

From: William Preston Bowling <williamprestonbowling@yahoo.com>
Sent: Thursday, April 18, 2013 3:21 PM
To: Paulson, Roger@DTSC
Subject: Comments In Situ Chemical Oxidation (ISCO) Work Plan

Dear Mr. Paulson,

In regards to the In Situ Chemical Oxidation (ISCO) Work Plan for the Santa Susana Field Laboratory, this should not be used as an end-all whereas source removal is a more true tested way to remove the contaminants that have a potential threat to human health and the environment. Contamination should not be put through a trial program while it is continuing the leaching or spreading over contamination.

Thank you for consideration of these comments.

William Preston Bowling
Founder ACME
Aerospace Contamination Museum of Education
<http://www.acmela.org/>

Response to Comment Letter Number 1

April 18, 2013

William Preston Bowling
Aerospace Contamination Museum of Education

Response

The Field Experiment will be conducted to study the effectiveness of ISCO in removing VOCs from saturated bedrock in the Chatsworth Formation at SSFL. If the technology is effective, it will be evaluated in a Corrective Measures Study for source removal at multiple locations at SSFL.

In regard to the leaching or spreading of contamination, regulatory guidance and standard practice call for conducting tests to evaluate potential remediation technologies to design the final remedy. Source removal and plume front containment prior to identification and implementation of a site wide groundwater remedy are objectives of the upcoming Groundwater Interim Measure.

LETTER NUMBER 2

Paulson, Roger@DTSC

From: William Vietinghoff <willvee@verizon.net>
Sent: Thursday, March 28, 2013 8:33 PM
To: Paulson, Roger@DTSC
Subject: Comments on Public Notice for SSFL ISCO Field Experiment
Importance: High

Mr. Paulson,

This email is sent in response to the Public Notice of the Santa Susana Field Laboratory, Canoga Park, CA In Situ Chemical Oxidation (ISCO) Field Experiment. The Public Notice was published in my local newspaper, The Ventura County Star. The Public Notice allows participation by public comment.

The document I am commenting on is titled "**WORK PLAN ADDENDUM #1 IN SITU CHEMICAL OXIDATION FIELD EXPERIMENT SANTA SUSANA FIELD LABORATORY**".

The basis for my comments is that I am a Chemical Engineer, with a B.S. in that degree and have spent all of my life in the engineering field. I am familiar the trichloroethylene (VOC) soil contamination at the Santa Susana Field Laboratory.

I have read all of the 81 pages of the Work Plan. I do not have specific comments about the description of the soil structure, the chemistry of the oxidation reaction used to degrade the trichloroethylene (TCE), the location of the drilling, the drilling technique, the sampling methods, the sample analysis, and the groundwater monitoring. I am satisfied that the thoroughness of the description of each step indicates that the plan has been well thought out. There is nothing new, unusual, or radical in the elements of the process; every consideration has been anticipated and explained in great detail. The dates of the reference documents and work on this project indicate it has been under study and planned over a long period. The chemicals used, the steps for injection, and the sampling pose no hazards. The analysis of the reaction below ground suggests that although some of the KMnO_4 may be used up by reaction with the minerals and organic carbon in the soil, it will reduce the amount of TCE present. Although, as the work plan explains, the TCE is locked in the sandstone, there has been much expressed concern that the presence of the TCE could be hazardous to offsite areas and people who may use the Santa Susana area in the future. This Field Experiment will serve two purposes: it will demonstrate that there is concern for the TCE contamination and that steps are being taken to eradicate it. The detailed explanation of the whole process seems to ensure that there will not only be beneficial effects at the site of the Field Laboratory, but the results and data obtained will be useful in cleaning other sites.

I recommend that the In Situ Chemical Oxidation (ISCO) Field Experiment proceed immediately.

William Vietinghoff
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Thousand Oaks, CA 91360
willvee@verizon.net
Home: 805-495-7865
Cell: 805-358-7762

Response to Comment Letter Number 2

March 28, 2013

William Vettinghoff

Response

Comment noted.