

# COMMITTEE TO BRIDGE THE GAP

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RE: Comments on Draft Group 6 RCRA Facility Investigation (RFI) Report

Dear Mr. Riley:

Thank you for the opportunity to comment on Boeing's Draft Group 6 RFI Report for the Santa Susana Field Laboratory (SSFL). We think the Department's decision to permit public input on these RFI reports represents an important improvement in the process for assuring a protective cleanup of the site, one that instills public confidence.

Because this is the first RFI report being released, it is perhaps an appropriate time to address underlying problems likely to be common to all. And because this new policy of permitting public input is being initiated fairly far along in the process, some of these comments will inevitably appear to be criticisms of how things have been done up until this changed and improved policy. We hope that the reader will understand it as a positive effort to help get things back on course. What is past is past. But for the future cleanup to be one that truly protects public health and is one in which the public has trust, a number of problems need to be squarely faced and rectified where possible.

We have therefore endeavored to be candid in this comments about generic underlying problems that need to be addressed for this and the following RFI reports to be acceptable. They are, after all, key to the final cleanup decisions. We recognize that not all the problems we identify may be solvable, under the current regulatory structure. Some perhaps can only be addressed indirectly; some we may have to try to just live with. But it is important to acknowledge the core problems and solve those which can be solved. Otherwise, the goal all share of a truly effective cleanup may be hard to achieve.

## 1. Independence of Contractor, Credibility of Report

The community has long had the misimpression that DTSC was responsible for the chemical cleanup. DTSC has long tried to explain that Boeing is responsible for the cleanup, but under DTSC oversight and regulation. Between these two positions has been DTSC's assurance that it has the power to approve Boeing's contractor(s) and tell them what they can and cannot do. In short, DTSC has said that it will assure that the contractor(s) act to protect public health, rather than to protect Boeing's interests.

Our reading of the Group VI Draft RFI Report suggests that this underlying problem remains significant. Over and over again, the document sounds more like a legal brief by Boeing counsel, arguing for minimal cleanup to be required, rather than a neutral scientific assessment of the contamination. It is almost as though a computer "macro" key had been repeatedly pushed, at routine intervals tossing in the generic claims that use of toxic materials in the area was "very limited," concentrations found are "low," "concentrations are statistically consistent with background," "minimal migration," "not significant," "significant transport is not indicated," "surficial transport is not considered significant," "likely resulted from a few small, isolated releases," "are not believed to be migrating," "does not suggest groundwater impacts," etc. And the conclusions seem equally to be pre-ordained hits of a macro key: "no further characterization is needed," "individual chemical use areas have been delineated sufficiently for risk assessment and evaluation of potential impacts," "no further characterization of VOCs is needed," "no further characterization of dioxins is needed," "no further characterization of metals is needed," and so on.

The inadequacies of the RFI report all go in one direction: assertions that there is little contamination at the site, little risk, little need for remediation, etc. The report repeats claims of Boeing's matrix diffusion model that contamination is "hung up" in the soil matrix and doesn't need to be cleaned up; that fine grained units and earthquake faults block migration of contaminants so they don't need to be cleaned up; and on and on. The brief historical discussion is very one-sided, ignoring or diminishing the significance of past accidents. The health effects estimates are based on improper inputs, all pushing the estimated risks down inappropriately. Again, the document reads as though it were a submission by lawyers for Boeing arguing against any significant cleanup of the site it contaminated.

The problem is how can cleanup actually get effectively accomplished when the primary documents are not neutral scientific reports but advocacy reports pushing for limited cleanup? Unless this fundamental problem is addressed, we are left with a kind of game: Boeing submits severely skewed reports, filled with false claims and, more importantly, huge omissions; DTSC staff reviews and tries to catch what errors it can; Boeing agrees to fix some of them in a kind of negotiated compromise; and in the end the cleanup decisions are somewhere in between what Boeing had initially proposed and correction of the handful of errors DTSC could catch.

This creates an incentive for a kind of "hide the ball" game. Boeing submits reports with huge distortions and omissions, hidden as best it can; DTSC tries to catch some of that which was hidden; and compromise is then reached on those few matters caught. But a great deal will

never be caught this way. For example, as will be discussed below, while admitting that the land use in the area is rural residential, and Boeing asserts in the RFI report that it has calculated exposures based on a “residential” scenario (note that it has dropped the word “rural”), in fact, as best can be determined from the report, it has used a suburban residential scenario, which reduces calculated exposures and risks by orders of magnitude and allows Boeing’s consultant to assert that very little contamination should be cleaned up. If DTSC is to catch this, it will be almost by luck, because Boeing does not make it clear in the text. Similarly, the historical site assessment relied upon by Boeing is so trivial (about one sentence given to the SRE meltdown, for example, trivializing it), that there can be no confidence whatsoever in the claims made about knowing where to look and what to look for. But it would be hard for DTSC to ascertain this on its own.

So the current process encourages false statements, misleading statements, and material omissions. If DTSC catches a few of these, all that happens is that Boeing’s contractors has to modify the text a bit in those areas. Any such misrepresentations not caught remain. The incentive is great therefore to mislead.

Agency review of a polluter’s technical submissions should be a bit like statistical sampling processes for determining extent of contamination at a site. Sampling is precisely that – it doesn’t presume that the places one finds contaminated are the only ones, but that there is a high likelihood of other contamination in the places not sampled. Samples are supposed to be *representative* of the places not sampled, and tell you something about the places you haven’t been able to check. Similarly, if agency review of Boeing’s contractor’s submission in this report identifies a number of aspects that are wrong, misleading, or have major omissions, at some point the magnitude of these problems must lead to a conclusion that one cannot rely on the submissions by that contractor at all. DTSC can’t be expected to find all the errors or matters left out. It is just doing a sampling. If it finds a tendency to significant bias, all in one direction (minimizing potential contamination and need to clean it up), one needs to reject the full report and tell Boeing a new contractor needs to be selected that is truly acceptable to DTSC and that will provide scientific and neutral reports, not advocacy pieces. Our review of this RFI report suggests the Department should consider reaching that conclusion here.

## 2. Fundamental Matters Affecting the RFI Reports

### a. Establishment of Field Action Levels, Groundwater Comparison Concentrations, “Background Values,” Detection Limits, Contaminants of Concern, Historical Site Assessment, Sampling Assumptions and Locations, Monitoring Techniques

Although we very much appreciate the opportunity to comment about the RFI draft report, virtually all of the key decisions upon which it is based have already been made, without public input. They are significantly flawed, and thus the RFI report is unreliable. We believe these critical decisions need to be revisited, in a fashion with useful public involvement.

For example, at numerous places in the RFI report it is noted that detection limits had been set above the appropriate comparison value (e.g., Maximum Concentration Limit). In other words, the measurements had been so insensitive that they couldn’t “see” contamination at the levels of concern. This is very troubling. It is hard to understand how Boeing could have been

allowed to use detection limits so lax as to miss contamination above permissible levels. There is no detailed discussion of this problem in the RFI report. The issue needs to be reviewed and new measurements undertaken that rectify the problem.

Earlier reports had referred to Field Action Levels (FALs), risk-based values against which measurements were compared and which helped establish when to do step-outs. We don't see direct use of the FAL term, but there are other comparisons used (e.g., GWCC), without significant discussion, in determining which measurements are supposedly significant. The public needs to be involved in determining these values.

Measurement techniques (e.g., filtering of water samples) are not discussed in the RFI Report, and public involvement in establishing them has been missing. Similarly, the determination of which contaminants are of concern in Group VI was done behind closed doors; the RFI appears to substantially narrow the range of COCs, based on a skewed historical review.

At the core of the RFI is a flawed assumption: Boeing knows and has disclosed where spills and releases may have occurred, and measurements nowhere else need be taken. So a very small number of samples have been taken, for so large an area (e.g., 41 soil samples for VOCs). And as best can be determined from the report, no effort at random sampling was made—essentially, all samples were taken from a few subareas, with no effort via gridding to see if there were contamination in areas Boeing hadn't self-identified as problematic. Given the history of surprises to date (e.g., mercury contamination found outside the SRE where not expected, found only because LARWQCB found and cited Boeing for elevated mercury leaving the property at the nearby NPDES discharge point), this is methodologically indefensible. A random sampling program across the area needs to be established, with significant enough number of samples to have a reasonable chance both of finding contamination if it is there and of identifying the likelihood that there is contamination in areas not sampled.

We have been critical in the past about the premises used for determining “background” concentrations. All such measurements have been taken on SSFL property. Given the history of open-air burning of toxic materials, so that contamination can “fallout” over a wide area, this creates the potential for comparing “dirty” to “dirty,” rather than “dirty” to “clean,” the fundamental purpose of background measurements.

The “historical site assessment” is completely insufficient and skewed, and thus the identification of locations to review unreliable. The HSA document itself (Sapere), referenced in the RFI, can only be described as company propaganda rather than a neutral and honest review of the historical accidents, spills, and releases. Sapere looks at a site, says Boeing says nothing serious happened there, and moves on. EPA and DOE had negotiated for EPA to conduct that review, as part of a site characterization; DOE refused in the end, and had Boeing contract to do it themselves. Rocketdyne has never been candid about its accident history – case in point: its false statements to investigators after the explosion that killed workers in the mid-1970s, leading to eventually having to plead guilty to felony environmental crimes. We need to revisit the whole process of doing a historical site assessment, which is key to a successful cleanup. This needs to include a mechanism for DTSC to obtain information from past and present workers.

#### b. The Conclusions Are Conclusory and Without Basis

The RFI Report over and over again simply says no further characterization is needed; risks are acceptable; no further cleanup (with a few exceptions) is necessary.

Estimated risks are based on a whole series of assumptions which are neither transparent nor subject to public input. They derive in part from the SRAM, about which the public has been frozen out, and in part from assumptions not even stated.

One key matter is the land use scenario. As best as can be determined from the RFI report, Boeing appears, without actually so disclosing, to have used the suburban residential scenario. However, on page 1-4, the RFI states that “land surrounding the SSFL is generally open space or *rural residential*....” (emphasis added) Indeed, that is the zoning for SSFL. In general, rural residential land use scenarios result in cleanup standards about two orders of magnitude higher than suburban residential assumptions; for the same contamination, risks much higher are found for rural rather than suburban residential. (This is because in addition to the exposure of having a home on contaminated land, one is raising foodstuffs on it as well. The suburban residential scenario does include some minimal consumption of fruit and vegetables from a presumed backyard garden, but overall far less exposure is assumed than for the rural residential scenario. The current land use close to the site is largely rural ranchettes, with cattle, goats, chickens, orchards, etc. That is how SSFL is zoned—RA-5. And EPA guidance generally requires use of local zoning for estimating prospective land use if that leads to the most protective cleanup standards.) If this one hidden mistake is corrected, far larger areas of Group VI would have to be cleaned up. Indeed, an entirely different set of detection limits might have been needed. Sliding over the land use in the RFI document by referring to “residential” without specifying which kind of residential use appears to invalidate all the conclusions therein.

#### c. Uncertainties Are Very Large.

The RFI gives the impression of very limited potential contamination and of high certainty about past activities. Yet the bits and pieces of the historical record so far disclosed raise very serious questions about that. For example, a November 18, 1966 Atomic International memorandum appears to contemplate the “Use of Low Level Radioactively Contaminated Oil as Road Oil.” It is hard to tell from the memo what ended up being done, but if radioactive waste was spread over the site as road oil, the assumption of looking for contamination only in the immediate area of specific buildings would once again be proven unwise.

#### d. Need to Coordinate with EIS for Area IV.

The federal court that ordered an EIS made clear that the cumulative impacts of radioactive and chemical contamination needed to be considered together. The RFI report only considers risks – albeit, as indicated above, dramatically minimizing them—for the chemicals. One needs to fully understand both the radioactive and chemical risks and then assure that the *cumulative* risk is as close to the  $10^{-6}$  remediation goal as possible.

Furthermore, the EIS should involve far more site characterization than has occurred to date, both in terms of review of the historical record and actual measurements. The Group VI RFI process (and the other Groups) should be coordinate with the EIS. Hopefully additional information will be provided that will make the overall cleanup decisions more comprehensive.

### III. Specific Comments on RFI

ES-1 Claims “Characterization of the Group 6 Reporting Area is sufficiently complete....” We disagree; very few samples taken, and only in a few areas; historical review very spotty.

bottom paragraph: Doesn't identify land use assumption for calculating risk

1-1 Part of Area I is owned by NASA

1-3 AI nuclear activities continued until th early 1990s.

1.1.2 key – concedes land use in immediate area is rural residential

1-4 overstates DHS role, as DHS conceded at last InterAgency Work Group mtg

1-10 there should be some explanation for this strange division of the land. Part of the parrot's beak in the SRE area is Group 6, part not. part of Group VI is in Area IV, a 1 acre in Area III. Why?

2-1 Claims meteorological data has been collected for SSFL since the 1960s. Because of the controversy over whether Boeing has withheld met data from the 1959 meltdown, it is important for DTSC to ask Boeing for proof that it took no meteorological measurements in the 1950s; if they did, they should provide the data.

2-9 Boeing again makes the spurious claims about contamination from fire; largely rejected by LARWQCB; and unseemly. Always trying to blame someone else for the contamination.

Section 3.0 Very skimpy and tending to minimize all past uses and spills. Needs to be redone, thoroughly, reliably, neutrally.

3-4 Cesium discovery in 1988 strange and raises serious questions: cesium wasn't supposed to be stored in OCY, suggesting lots of bad stuff may be in places not expected, and that they violated their rules routinely. And raises questions about decade-old decision to release for unrestricted use.

3-5 SRE claimed to be all gone, with a couple of exceptions. But I understand that part of the reactor concrete subgrade remains, with potential for contamination that will leak out of the cement.

Inappropriate to claim the SRE was “contained” within Building 143; it had no containment structure.

SRE pond seems key; amazing designed to collect waste water runoff from SRE operations. Big potential for contamination. Particularly given natural drainage ”leading offsite.”

A single sentence about the meltdown, just referring to “cooling failure and resultant damage to fuel assemblies.” It is inconceivable that review of this area would slide over such a serious accident, one with potential for contamination affecting this report.

3-6 Cleaned up to 1983 standards, not even acceptable under today's DOE standards. No consideration of this matter. Raised by EPA in its 2003 letter—problem of old cleanups under standards not acceptable today.

Where did the concrete rubble, potentially contaminated, end up? Checked for rad and chemical contamination?

Solvents were “discharged to the ground north of the ‘box shop’.” Given this bad practice here, what effort has been undertaken to see if it occurred in numerous other areas in Group VI? States “all of the SRE-related buildings have been removed.” We understand this isn’t true; there are underground structures that have just been buried.

how did the Cesium contamination get there? Did they remove all of it? Where did it go—licensed site? If Cs contamination ended up there, where it shouldn’t, what effort has there been to find where other contamination is, where it shouldn’t be? What evidence exists about potential contamination in the foundation structures in bedrock?

3-7 Very puzzling. If Building 064 was supposed to be used just for packaged uranium and thorium, how did Cs-137 contamination end up there. If illegally stored there and leaked, what is being done to check the rest of the site for contamination in areas where it shouldn’t have been?

The premise of the RFI is that contamination can only occur in areas known to have had the materials in the first place. What else has been missed? What evidence even this has been adequately cleaned up?

3-10 The claims about what chemical use occurred seem unsupported and not very comprehensive, minimizing potential materials.

3-11 Similarly, re solvents (“very limited”). No basis given; hard to be confident.

3-14 Perchlorate is used in nuclear research; we have evidence from old AI reports of such use. Perchlorate also has been found leaking from Area IV via NPDES discharge point. Lots of toxic chemicals are used in nuclear research; this section, composed of two sentences, seems very weak.

3-15 fundamental problem of the whole section: adequacy of review of what was used, when, where, and what spilled, where. Seems cursory and unconvincing.

4-1 weight of evidence approach seems weak when one is relying on self-serving claims by the polluter, who has a history of being less than candid and of violating environmental regulations and laws, which produced the contamination in the first place.

4-2 66 soil vapor samples and 41 soil samples is far too small, for such a large area. Choosing locations based on presumed site use is fundamentally flawed. (1) we don’t have a good feel for site use, and (2) there needs to be random grid sampling to find that which Boeing hasn’t disclosed.

4-3 keeps saying “low” concentrations, but nothing to compare it to is provided. Claim that the VOC detections “are consistent with limited use and potential storage of solvents” is unsupported.

Because TCE was found in 1990 samples but not in 1998 creates impression it has disappeared, when likely just due to sampling small “n”. Boeing always questions its own positive readings; never its negative ones.

Would help if used the right symbol for micro – sometimes does, but sometimes reports as a box. Throughout there are no comparison values given to let reader know if the measurement is of concern. One should set FALs based on  $10^{-6}$  risk for rural resident with some conservative input assumptions; and also do random sampling.

4-4 a single soil vapor sample seems insufficient.

Similarly, four piezometers seems insufficient.

Indeed, one of the four has not been sampled for chemicals; one only twice and only once.

Even with the tiny amount of sampling, methylene chloride and acetone were both detected. But because they were non-detect in a single sample two years later, the report appears to dismiss the finding.

no bedrock samples at all were taken. given that transport through fractures in the bedrock is one of the primary pathways, and rainwater percolating through surface soil would carry contaminants into the bedrock, this decision needs some defense.

4-5 again, seems aimed at minimizing the data, which in fact show 5 of 7 CFOU monitoring wells showing TCE, and exceedances of MCL. MCLs matter, and should not be dismissed as “low concentrations.” Again, contractor seems to dismiss readings when found one year but not another—always the same attitude, which reflects a failure to understand variability in fractured bedrock situations.

Similarly, the party line is given about other TCE plumes in adjacent reporting groups—“it is believed” that the neighboring plumes don’t contribute to VOCs detected in Group VI. They make it sound like no one believes it; always passive voice. Should simply say, Boeing doesn’t believe... We find this longstanding claim questionable.

4-6 Strongly disagree with claim about completeness of characterization -- believe it to be far from complete.

contamination shouldn’t be found in the leachfield – means contaminants were inappropriately dumped down.

4-7 why was near surface groundwater not analyzed for SVOCs; again, no bedrock measurements.

4-8 disagree with claim that “individual chemical use areas have been delineated sufficiently for risk assessment”, and that characterization is complete and no further characterization of SVOCs is needed.

129 soil samples again seems like a very small number for such a large area; and again fundamental flaw of only sampling where Boeing had self-identified use. If we have learned anything, (a) that can’t be relied upon, and (b) there are always surprises at SSFL.

4-9 Again, no NSGW or bedrock measurements made.

4-10 TRPH was detected, but they then conclude there aren’t groundwater impacts; seems unconvincing.

4-13 only 44 samples analyzed for dioxins – seems way low. Again, only looked where Boeing said to look; no random grid sampling. Inappropriate. yet found up to 660 times “background” in drainages. (even though background value questionable).

4-14 again disagree about claim no further characterization is needed, characterization claimed to be complete.

4-15 troubled by claims about background; view the background assumptions with skepticism, given their onsite basis.

4-17 seems to try to explain away all metals except copper and thallium. questionable.

4-18 The attempt to blame the fire should be rejected.

5-1 and following The transport claims should be rejected. The matrix diffusion model is just a fancy way of claiming they don’t have to clean up the contamination, and their modifications to the Johnson-Ettinger vapor infiltration model need to be viewed with great care.

5-3 Boeing apparently is trying to modify EPA’s vapor intrusion model. Our presumption is that their modified model will result in lower estimated exposures than EPA’s. We urge careful review, with public input, of the modifications.

5-4 Same thing for their modified airborne dispersion model. The working group recommended at the end of this should address both matters in detail.

The Technical Memorandum Conceptual Site Model should be rejected. Professor Harmon has empirically disproved it. He and Professor Huntley have both shown also that there is exchange between TCE phases so that continued migration of TCE is expected ; even if applicable, the model furthermore wouldn't be applicable to most other types of contaminants. The reliance in the RFI on models which purport to reduce transport and exposure again raises questions about the neutrality of the contractor.

5-6 the concentrations predicted by using the Johnson-Ettinger model need to be carefully reviewed; did Boeing use EPA's assumptions, or its own modified assumptions?

The claim about matrix diffusion a high retardation needs to be rejected; and again shows the lack of neutrality on the part of the contractor. All we are getting is claims as to why contamination should be permitted to be left unremediated.

5-7 Same story; always claims such as "limited mobility" and "are not believed to be migrating." (always passive voice). Similarly, "based on this conclusion...quantitative modeling was not applied." It is not a conclusion, it is a Boeing assertion.

If concentrations are going down, as they are claim, how is it possible that the contamination is NOT migrating?

5-9 Same problem again: "concentrations *likely* resulted from a few small, isolated releases," "surficial transport of VOCs *is not considered significant...*" (emphasis added). Every statement minimizes problems; everything is in passive voice, as though what Boeing considers significant is supposed to be what everybody considers significant, end of story. Unconvincing. Again, diminishes credibility of contractor to such as point as to make everything unbelievable. An RFI report should be a neutral presentation, erring if at all on protecting the public. Instead, this is a propaganda document for the contractor's employer, Boeing, an advocacy document by a polluter trying to not be held accountable. Should be rejected in its entirety.

5-10 the pattern continues: "minimal migration," "insignificant transport," "significant transport...is not indicated."

6-2 We don't trust the "background" values relied upon, as discussed earlier, nor the method of asserting that measurements are "statistically consistent" with background. This matter needs to be revisited generically for the whole RFI process.

6-3 Drinking water risks should not be dismissed, because it implies that one can contaminated aquifers and need not clean them up, by arguing that one will just lose the beneficial use of the aquifer. Environmental protection is protecting groundwater from such contamination so that its beneficial use is maintained.

We remain very concerned about the practice of filtering samples, which Boeing here describes as its normal practice. There still isn't clarity about this practice; DTSC has variously admitted filtering, denied it, and said filtering only occurs for metals.

Says vapor migration into indoor air was estimated using a model which is being validated for the site. Earlier they said they were using the EPA model, then implied they were also modifying it. needs to get clarified which model was used for the results given; we remain concerned about modifications Boeing might make, and whether these are designed to drive down the results.

6-4 not clear thallium has been appropriately excluded; argument about it being above background but nonetheless "consistent with background" is troubling, and once again argues for a detailed session between DTSC and key public about both what values are used for background and how it is statistically treated.

claims about thresholds show author bias; no discussion of how extrapolation can result in understating risk.

6-5 All of this risk estimates slide over which residential scenario is used; based on our review of the few inputs identified in the appendix, it appears to be suburban rather than rural, as required. Note that even with all the manipulation of inputs, they estimate risk of  $7 \times 10^{-5}$  for NCY, very close to the  $10^{-4}$  upper limit of the risk range. A close examination of the inputs is essential.

also, did Boeing average concentrations, generally not permitted by EPA? In any case, one should undertake cleanup efforts to push the risk down as close to  $10^{-6}$  as possible. Note that if the rad risk were just  $3 \times 10^{-5}$ , the cumulative risk would be  $10^{-4}$ , where the acceptable risk range stops even if one has an excuse not to shoot for the lower end. And that assumes the calculation is done right and they were using the correct land use scenario, which they aren't.

OCY is an astonishing  $2 \times 10^{-2}$  risk, even with all the problems with their inputs.

Note that the calculations are only for adult and child receptors. The most vulnerable should be used for the calculation, which presumably would be the fetus and the infant.

6-6 claims that  $4 \times 10^{-4}$  risk is within the typically acceptable risk range – that just isn't true.  $1 \times 10^{-4}$  is the typical upper limit; it is not a bright line, and one can be around 1 (i.e., 2) in some circumstances, but  $4 \times 10^{-4}$  is never considered within the range.

## Recommendation

DTSC should assemble a small group including key representatives of the public, meeting over several days, to try to come up with new approaches to dealing with the series of underlying assumptions that will affect all RFI reports. These issues include:

- How to obtain a trustworthy, reliable, and comprehensive historical site review that gives an accurate handle on past activities, uses of toxic materials, spills, accidents, releases, and areas requiring further investigation.
- Appropriate land use assumption for calculating risk, comparison values, and cleanup standards.
- Appropriate input assumptions (breathing rates, resuspension factors, bioaccumulation levels, environmental half-lives, etc.) for these calculations.
- How to perform random sampling with sufficient statistical power to get a good grasp on contamination in areas not self-identified by Boeing
- Appropriate detection limits; contaminants of concern; measurement methods.
- An improved process that does not rely on Boeing making claims of no problem, DTSC reviewing, and a modified Boeing report approved, but which instead relies on a neutral and scientifically defensible analysis in the first place.
- How to establish defensible background values.

Such a meeting could take the existing draft RFI report, and go over it page by page, including backup documents and the historical documents so far provided. This might help identify core underlying issues that may need to be addressed for all RFI reports, and outline a path forward for resolving those matters.

Again, we appreciate the opportunity to provide these comments; hope they are helpful; and look forward to further cooperation.

Sincerely,

Daniel Hirsch

cc: Laura Rainey  
Louise Rischoff  
Laura Plotkin