

## Critique of DTSC “Interim Summary” of Woolsey Fire 12-18-18

In the wake of the SSFL fire, DTSC issued assurances that no radioactive or toxic chemical contamination had been released. However, DTSC refused to release any actual data, or any scientific explanation how one can burn hundreds of acres of contaminated vegetation growing in contaminated soil and not release any contaminants. Given the roles of DTSC – and DOE—in creating the contamination at SSFL in the first place and in breaking the promises for cleanup to be completed by last year when it hasn’t even started, there has been a good deal of legitimate skepticism about DTSC’s assertions.

Nearly six weeks after the fire—and after numerous requests from the community, news media, and legislators—DTSC finally issued an “interim summary” report about the measurements that formed the basis for their claims that no contamination was released by the fire. However, few actual measurements are reported, and those that are, raise far more concerns than they allay:

- All DTSC samples were taken **days after the fire**, making them essentially irrelevant. The issue of concern is whether the smoke **while the fire** was burning contained SSFL contaminants. This fundamental defect is amply demonstrated by the photo on the cover of the DTSC report:

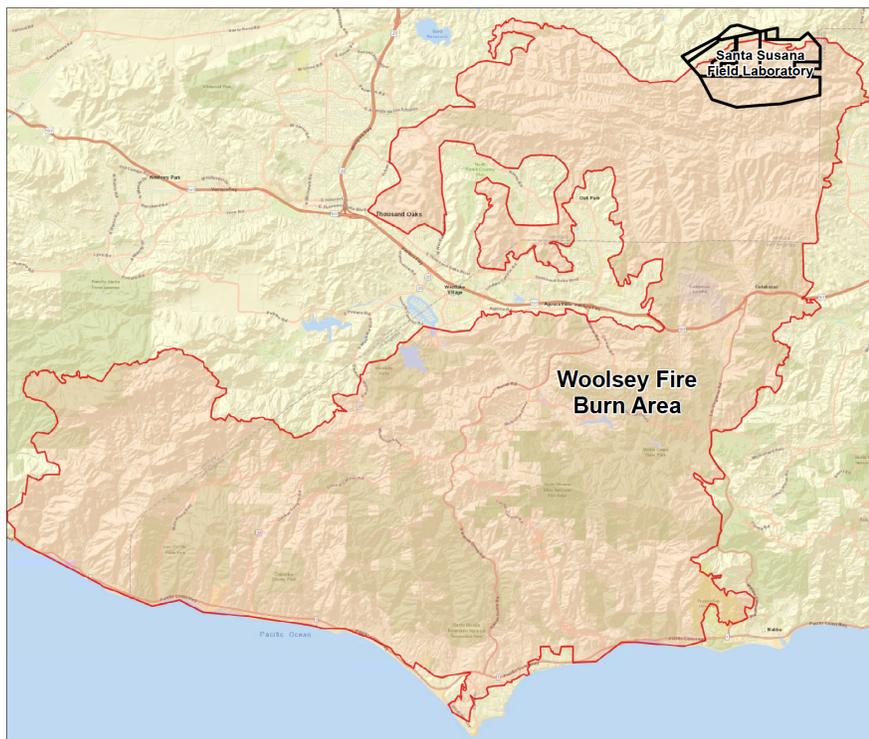


Response Team members set up air sampling equipment on November 10, 2018, in Area I of the Santa Susana Field Laboratory to measure air contaminants after the Woolsey Fire.

Note the air sampling equipment is being set up on burned ground **two days after the fire** when nothing was still burning and there no longer was any potentially contaminated smoke being released. To claim this proves that nothing was released days earlier during the fire borders on fraud.

- DTSC took only 3 air samples, 5 ash samples, and 23 soil samples from the entire SSFL and surrounding areas. Roughly half of the locations sampled were on SSFL; only about 14 sampling locations were offsite. The ability to catch areas that might have gotten contaminated by plumes touching down is close to zero with such a small sample size.
- None of the samples was tested for radioactivity.
- Most toxic chemicals were not tested for.
- What measurements of samples were made were compared to standards hundreds of times more lax than DTSC's own risk based screening levels.
- Even so, toxic chemical contamination was found in some samples; DTSC then tried to dismiss its own findings.
- Hand-held equipment was used for some minimal scans, with sensitivity generally incapable of measuring contaminants at the levels requiring cleanup. Even so, direct radiation readings in offsite areas were measured at twice background. Again, DTSC tried to dismiss its own findings.
- Most troubling, DTSC—and the other agencies—assert that none of their measurements for radioactivity or toxic chemicals found any contamination whatsoever at SSFL. This is extraordinary. DTSC, DOE, NASA, EPA, etc. all have long admitted that there is widespread contamination there; that's the whole reason for the required cleanup. EPA spent \$40 million and several years testing Area IV for radioactivity and found hundreds of locations with elevated radioactivity. Tens of millions of dollars have been spent by other agencies finding thousands of locations at SSFL with chemical contamination. **For DTSC and others to say they couldn't detect contamination at SSFL leads to one of two conclusions, both very troubling. Either their equipment was too insensitive to detect contamination that is there, and thus their conclusions are worthless; or the fire drove off all the contamination at SSFL—into the surrounding communities. Clearly that is not the case.**
- Finally, the only data that would be worth having are the measurements from the network of air monitors set up at SSFL and, if not destroyed in the fire, sampling air during the fire itself. Curiously, those data are almost entirely missing from the report. There are 14 air monitors in the network. For some reason, the report gives data for only 2 of them, and only partial data at that. Furthermore, those limited data raise more questions, given that much poorer detection limits are reported than those for the pre-fire period, and no chemical data are reported at all. Where are the missing air monitoring data from the time of the fire and why haven't they been reported?

DTSC in its report admits that most of SSFL burned. See map from the report:



After initially denying that any contaminated portion of SSFL had burned, and thus basing its original claim of no releases on that now-admitted false claim, DTSC admits that much of the site had been in flames, including large portions that are contaminated. **It simply isn't credible that one can burn hundreds of acres of contaminated vegetation and soil and not have some of that contamination released. DTSC's latest attempt to waive away that fundamental scientific fact is Orwellian. War in not Peace. Burning a contaminated site is not safe.**

DTSC's current claims continue a pattern of trying to cover its backside given its failures to keep people safe by preventing the SSFL contamination in the first place and failing to live up to its promise to then get it cleaned up. Is it entirely coincidental that DTSC issued its report on the same day DOE broke the cleanup agreement and announced it intended to leave 98% of its contaminated soil not cleaned up? **The only solution is to finally get SSFL fully cleaned up; and get the non-credible agencies cleaned up as well.**

---

Prepared by Daniel Hirsch, the retired Director of the Program on Environmental and Nuclear Policy at the University of California, Santa Cruz, and President of the Committee to Bridge the Gap. He has been asked by the *Bulletin of the Atomic Scientists* to write an article for the *Bulletin* on the DTSC's measurements and claims about whether the fire at the Santa Susana Field Laboratory resulted in releases of radioactive and/or toxic chemicals. Because of the public concern, this preliminary review of DTSC's interim summary report is being made available now. Readers wishing further detail are referred to the forthcoming article.