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December 17, 2010

Mr. Eric Hoffman, Authorized Member Representative
Runkle Canyon, LLC
10990 Wilshire Blvd., 8th Floor
Los Angeles, California 90024

APPROVAL OF DOCUMENTS RELATED TO THE EVALUATION AND CLEANUP OF RUNKLE CANYON PURSUANT TO THE JULY 22, 2010 RESPONSE PLAN, SIMI VALLEY, CALIFORNIA

Dear Mr. Hoffman:

The Department of Toxic Substances Control (DTSC), based on its review of information submitted by Runkle Canyon LLC, and after careful review and evaluation of the analytical results provided and DTSC's independently collected data, concludes that no further action is necessary with respect to the Runkle Property.

DTSC's determination and conclusions are based on the following information:

Background Information

The Runkle Property is located at the southerly terminus of Sequoia Avenue in the City of Simi Valley, Los Angeles County, California 93065. The Runkle property is approximately 1592.7 acres and bounded to the north by existing single family residential homes; to the east by the Brandeis Bardin Institute and the Santa Susana Field Laboratory; to the south by the Mountain Recreation and Conservancy Authority; and to the west by single family homes and open space.

Several different efforts have been undertaken to assess the Runkle Property for environmental contamination, including radionuclides. Sampling efforts began in 1998 and are summarized in Section 2.0 of the final *Evaluation and Health Risk Assessment of Soil Sample Results for Runkle Canyon Pursuant to the Revised Response Plan* (Evaluation Report - Dade-Moeller, December 2010.) In summary, data collected prior to 2005 showed significantly different results than data collected after 2005.

Groundwater at the site was evaluated by the California Regional Water Quality Control Board. In April 2007, the RWQCB concluded that perchlorate or volatile organic compounds were not potential risks to human health or the groundwater resource in Runkle Canyon.

DTSC was not directly involved in the development or generation of any sampling at the Site until 2008. On April 23, 2008, DTSC and Runkle Canyon, LLC entered into a voluntary oversight agreement pursuant to the California Land Reuse and Revitalization Act (CLRRA, Docket Number HSA-CLRRA-07/08-160). DTSC reviewed information from the previous environmental reports relating to the subject property.

On Oct 17, 2008, DTSC provided comments, via letter, based on review of 41 characterization documents submitted by Runkle Canyon LLC, DTSC requested that Runkle Canyon LLC submit a Response Plan to DTSC for additional radiological sampling and sampling of a white crystalline material. DTSC also requested the Response Plan include a plan for removal of a tar-like substance found at the subject property. Based on the review and previous determination made by the RWQCB, DTSC determined that there was no need for further investigation of groundwater or surface water at Runkle Canyon.

A draft Response Plan (Dade Moeller, December 4, 2008) was submitted to DTSC and made available for public comment from January 14, 2009 through February 13, 2009. On January 28, 2009, DTSC held a public meeting regarding the Response Plan.

The Response Plan included three main components:

- Site summary, including a history of radionuclide sampling in Runkle Canyon, and a radiological health assessment
- Soil-Sampling Plan for Proposed Non-Residential Eastern and Southeastern Areas of Runkle Canyon (Appendix A of the Response Plan)
- Plan for Removal of the Tar Material from the Drainage Areas of Runkle Canyon (Appendix B of the Response Plan)

DTSC reviewed the Response Plan and, after careful consideration of the public comments, as well as review of analytical results from DTSC's own collection of samples, DTSC issued a letter dated July 22, 2010, concluding that no further action was necessary in regard to the white crystalline material and the surface water. DTSC required:

- Chemical sampling during trenching in the old quarry area, and
- Confirmation sampling following removal of the tar material, and
- Additional samples for analysis of radionuclides in order to determine whether environmental conditions at the site posed a health risk to future site occupants.

Chemical Analysis at Trench Area

The report entitled *Runkle Canyon Response Plan Soil Sampling - Chemical analysis* (Stantec, September 28, 2010) documents sampling performed in trenches near the old quarry in suspected fill material. Both DTSC and Stantec, Runkle Canyon LLC's contractor, collected soil samples to evaluate if the fill material contained chemical waste. The only chemicals detected were total petroleum hydrocarbon-motor oil range (TPH_o), and acetone. TPH_o was detected in five of six samples analyzed by Stantec, at concentrations near the detection limit. TPH_o was not detected in the DTSC splits of the same samples; however the DTSC detection limits were higher than the Stantec detection limits. The Regional Water Quality Control Board (RWQCB) environmental screening level for TPH_o is 2,500 mg/kg. The highest detection in the Stantec samples was 12 mg/kg, so it was far below any level of concern.

Acetone results detected in DTSC's samples were reported at estimated levels (highest 0.240 mg/kg) outside the laboratory calibration and were significantly below the risk screening levels of 61,000 mg/kg.

Analysis of metals concentrations did not indicate any elevated metals concentrations, arsenic concentrations ranged from non-detect (<2 mg/kg) to a high of 3.0 mg/kg.

Tar Removal Confirmation Samples

The report entitled *Results of Tar Removal Confirmation Samples* (GeoCon West Inc., September 29, 2010) documents the sampling performed once the tar material was removed and placed into drums for disposal. Six samples were collected and DTSC and GeoCon, the contractor for Runkle Canyon LLC received sample splits. Samples from the tar material prior to removal found benzo(a)anthracene (a polycyclic aromatic hydrocarbon) above the risk screening level of 0.15 mg/kg. Consequently, all the confirmation samples were analyzed for PAHs by the DTSC Environmental Chemistry Laboratory (ECL.) GeoCon also analyzed their six sample splits for PAHs. Of the six samples that DTSC analyzed, three samples had detections and three had no detections. Four different compounds were detected in the three samples with detections, although not all four were detected in all of the samples. The highest result four compounds detected were benzo(a)pyrene, chrysene, fluoranthene and phenanthrene. The concentrations were below the EPA respective risk screening level for non-carcinogenic PAHs.

Radiological Sampling

The report entitled *Evaluation and Health Risk Assessment of Soil Sample Results for Runkle Canyon Pursuant to the Revised Response Plan* (Evaluation Report - Dade-Moeller).

Fourteen sample locations were established using a Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) based sampling plan to evaluate the possible

presence of these radionuclides in the proposed eastern and southeastern open space areas of Runkle Canyon nearest to the Santa Susanna Field Laboratory (SSFL). A second set of 21 sample locations (revised from the July 22, 2010 proposed 22 locations) were selected by DTSC to evaluate the potential migration of radionuclides from the SSFL site onto Runkle Canyon, and to attempt to confirm the elevated radionuclide concentrations reported in the Foster Wheeler data set.

Two duplicate samples were also collected for each of the sample sets at randomly selected sample locations. In addition, six soil samples were collected from three sampling trenches dug in an area of fill associated with a closed aggregate quarry in Runkle Canyon. The distributions of results for both radionuclides are generally consistent with the expected local background levels. Results of samples taken from trenches dug in the fill area of a closed aggregate quarry show even lower levels of the two radionuclides.

The results of DTSC's collection and analysis of samples to evaluate the previous sampling efforts were presented in a report entitled *DTSC Radiological Sampling and Analysis Report - Runkle Canyon*. DTSC's report concludes the following:

- DTSC's results are significantly lower than the elevated levels of strontium or cesium seen in the Foster Wheeler - 1999 and Harding ESE - 2000 data.

- DTSC suspects but cannot confirm that the Foster Wheeler and Harding ESE results may have been an artifact of the sampling methodology, laboratory analysis or lack of stringent quality assurance and quality control measures. In any case, DTSC was not able to verify the Foster Wheeler and Harding ESE results.

- Comparing the 2010 DTSC and 2010 Runkle Canyon LLC results shows consistent and reproducible results.

- DTSC's evaluation of the entire 2005, 2007, and 2010 data sets do not show a pattern that indicates there was either an on-site source or off-site release from SSFL.

Conclusions

Based on DTSC's review of the Evaluation Report, and after careful review and evaluation of the analytical results, DTSC concurs with the report conclusions that the concentrations of ^{90}Sr and ^{137}Cs at the site do not pose a significant health risk under an unrestricted, residential land use scenario and hereby approves the Evaluation Report. DTSC concludes that no further action is necessary with respect to the subject property. This letter shall also serve as certificate of completion under §25395.97 of CLRRA that all response actions have been satisfactorily completed.

As with any real property, additional or previously unidentified contamination at the Site may require additional investigation and cleanup. DTSC reserves the right to take or require action at the Site if new or different information becomes known or available.

If you have any questions regarding the above, please contact me at (916) 255-3717 or Mr. Rick Brausch at (916) 327-1186.

Sincerely,

Mark Malinowski, PG
SSFL Performance Manager

cc: via e-mail

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