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March 28, 2011

Mr. Richard Schassburger
Federal Project Director
DOE-EETC
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Canoga Park, California 91309

2010 ADMINISTRATIVE ORDER ON CONSENT: CONCURRENCE WITH EXCEPTIONS TO CO-LOCATED SAMPLING, SANTA SUSANA FIELD LABORATORY, VENTURA COUNTY, CALIFORNIA

Dear Mr. Schassburger:

The Department of Toxic Substances Control (DTSC) received your letter dated February 23, 2011 regarding the *2010 Administrative Order on Consent Interpretation Concurrence* for the Santa Susana Field Laboratory (SSFL). In your letter, the Department of Energy (DOE) is seeking DTSC's concurrence for an approach regarding the chemical co-located sampling in Area IV and the Northern Undeveloped Land of SSFL.

According to the 2010 Administrative Order on Consent for Remedial Action (AOC - Docket No. HSA-CO 10/11-037), DOE is required to perform chemical co-located sampling at every location where the United States Environmental Protection Agency (U.S. EPA) is collecting a sample for radiological analyses. As described in your letter, DOE, in collaboration and coordination with DTSC, has identified decision criteria represented under three scenarios where departure from the requirement to perform chemical co-located sampling at every location where U.S. EPA is collecting a sample may be appropriate. These scenarios were revised to reflect stakeholder input. The three scenarios are:

- Scenario 1: "Clearly contaminated" areas that will require cleanup.
- Scenario 2: High-density radiological sampling based on US EPA elevated gamma survey results, where the US EPA sampling density exceeds the frequency necessary for a remedial investigation (RI) approach.
- Scenario 3: High-density radiological sampling of historical features where US EPA sampling density exceeds the frequency necessary for an RI approach.

Mr. Richard Schassburger

March 28, 2011

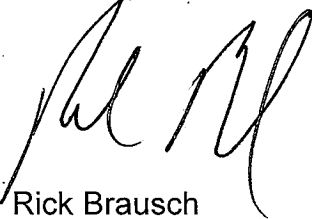
Page 2 of 3

DTSC concurs that Section 2.5.1 and 2.5.2 of the AOC can be implemented utilizing the described decision criteria as possible exceptions to the requirement to perform chemical co-located sampling at every location where U.S.EPA is collecting a sample. However, DOE may not unilaterally exercise the decision criteria, but may only exercise them in conjunction and collaboration with DTSC. In addition, DOE must document when and where the criteria are exercised to de-select co-located sample locations. This documentation shall be provided in sub-area addendums to the Master Field Sampling and Analysis Plan, prior to DTSC's review for approval. Changes that occur due to field conditions (e.g. auger refusal, etc.) must be documented in the draft report that provides sampling results, when sampling is complete.

In your letter you also describe a collaborative process for review and approval of chemical co-located sampling documents, including the exercise of the decision criteria. DTSC concurs that the described process for review and approval of chemical co-located sampling documents is appropriate and complete.

If you have any questions regarding this approval, please don't hesitate to contact me at (916) 327-1186 or via e-mail at rbrausch@dtsc.ca.gov or Laura Rainey at (714) 484-5434 or via e-mail at lrainey@dtsc.ca.gov

Sincerely,



Rick Brausch
Legislative and Regulatory Policy Director
SSFL Project Director
Department of Toxic Substances Control
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cc: See Next Page

Mr. Richard Schassburger
March 28, 2011
Page 3 of 3

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