Top Ten Questions for DTSC and DOE on the 2010 AOC

https://philrutherford.com/SSFL/2010_AOC/Top_Ten_Questions_for_DTSC_and_DOE_on_the_2010_AOC.pdf

1. The 2010 DOE AOC was written by former DTSC Acting Director Maziar Movassaghi, former DTSC SSFL Project Director Rick Brausch, former CalEPA Secretary Linda Adams and the late Dan Hirsch. None of these individuals have any influence over SSFL today. Why does today's DTSC and DOE leadership feel an obligation to perpetuate their flawed legacy?

2. Would today's DOE and DTSC leadership formulate a cleanup-to-background policy today? If yes, why yes? Why did DOE and DTSC leadership sign the AOC in 2010?

3. Why do DTSC attorneys claim they are unable to find any records of the drafting of, or the rationale for, the 2010 AOCs during the period August 2009 to December 2010? California PRA PR8-031025-02.

4. Does DOE and DTSC believe that cleanup-to-background is the only cleanup option that ensures protection of public health and the environment for future users of SSFL and nearby residents? Does issue of the AOC years prior to the issue of the DOE EIS, DTSC EIR and RODs violate NEPA and CEQA?

5. Why is SSFL the only remedial site in California and the U.S. with a consent order, mandating cleanup-to-background, with zero dose, zero risk as a goal?

6. Why is ETEC the only DOE-EM site in the DOE complex requiring cleanup-to-background, according to the Government Accountability Office's GAO-25-107565?

7. Would DOE support a dose-based, 25 mrem/y radiation cleanup goal for radionuclides, consistent with NRC regulation 10 CFR 20.1402 and DOE Standard, DOE-STD-1241-2023? If not, why not? If yes, why keep the AOC?

8. Does DOE and DTSC believe that EPA's Superfund, risk-based cleanup process would be protective for DOE's area of responsibility at SSFL? If not, why not? If yes, why keep the AOC?

9. Would DTSC support the USEPA's 2007 recommendation that SSFL be a Superfund site? If not, why not? DOE supported Superfund listing in 2008 … does DOE still support Superfund listing today? If not, why not?

10. Why does DOE and DTSC continue to refuse to address the specific technical, regulatory and legal reasons for terminating the AOC, provided in the April 6, 2026, letter?

Santa Susana Field Laboratory

Below is recent material regarding the Santa Susana Field Laboratory from Phil Rutherford *Consulting*. This material does not necessarily reflect the views of The Boeing Company, the DOE or the DTSC.

- Santa Susana Field Laboratory (2026)
  https://philrutherford.com/ssfl.html
- Offsite Impact of the Santa Susana Field Laboratory (2025)
  https://philrutherford.com/SSFL/Offsite_Impact_of_SSFL.pdf
- Nuclear Decommissioning at the Santa Susana Field Laboratory:
  20+ Years of Politics vs. Science (2025)
  https://philrutherford.com/SSFL/Nuclear_Decommissioning_at_SSFL.pdf
- Proposal to Terminate the 2010 AOCs (2026)
  https://philrutherford.com/ssfl.html#doeaoc
- Demolition of Boeing-owned Buildings in Area IV (2026)
  https://philrutherford.com/ssfl.html#boeingbldgdemo
- Radiation Dose, Risk and Cleanup Standards (2026)
  https://philrutherford.com/ssfl.html#rdrcs
- Sodium Reactor Experiment (SRE) Accident (2025)
  https://philrutherford.com/ssfl.html#sre
- SSFL - Inconvenient Truths (2025)
  https://philrutherford.com/SSFL/SSFL_Inconvenient_Truths.pdf

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