

From: D'Lanie Blaze
Sent: Monday, April 24, 2017 6:13 PM
To: DOL Energy Advisory Board Information
Subject: SSFL Submission to ABTSWH

Hello, Ms. Rhoades ~

It was nice to see you at the ABTSWH meetings in Pasco, and a privilege to provide Public Comment to the Advisory Board on Toxic Substances and Worker Health (ABTSWH). I am hopeful that you will disseminate this e-mail to the Advisory Board, along with the attached document.

At the meeting, I addressed Department of Energy (DOE) Coal Gasification (CG) operations, which are covered by EEOICPA. Currently at Santa Susana Field Laboratory (SSFL), only Area IV is considered to be a "covered area" under EEOICPA. However, I brought the Board's attention to additional DOE CG operations and facilities (Process Development Units, or "PDU's," used for coal gasification processes), located in SSFL Area I at a portion of the site known as "The Bowl."

A couple of years ago, The Bowl was added to the Site Exposure Matrix (SEM), presumably based on the accepted notion that all DOE operations at SSFL were strictly confined within Area IV. By virtue of noted DOE CG operations and PDU facilities having been located at The Bowl, it appears that an assumption was made that The Bowl must be located in Area IV.

In 2016, it was discovered that The Bowl is actually located at SSFL Area I. It was removed from the SEM. But, despite The Bowl's documented DOE operations and facilities, it does not appear that further inquiry was made regarding a need to expand the "covered area" to include Area I, which would have been congruent with EEOICPA. This has resulted in the following problems:

- DOE operations and facilities at SSFL have been inaccurately characterized
- PDU's and other structures associated with DOE CG processes have been excluded from the SEM
- DOE-Contractor employees associated with DOE CG processes at The Bowl are disqualified from EEOICPA, based on non-Area IV work locations.
- The SEM provides only a few Area IV CG facilities, and the list of toxic substances associated with CG processes is incomplete

I have attached a copy of my recent report on DOE CG Operations at The Bowl. A link to access all supportive documentation is provided, below. The report was recently submitted to DEEOIC and DOE, with the intention of ensuring that EEOICPA eligibility policy is based on accurate site history. I believe the information may be of value to the Advisory Board for several reasons, not the least of which is ABTSWH's responsibility of ensuring that the SEM provides accurate and complete information. The Board's ability to fulfill that obligation directly relies on DEEOIC and DOE's accurate determination of DOE Facilities under the Act, and I believe it is clear that SSFL Area I, "The Bowl" should be reconsidered.

In addition, Dr. Welch's insight and recommendations regarding worker exposure to vapors, gases, dust and fumes (VGDF) appear to be of direct relevance to CG workers of SSFL, particularly those associated with operations at the Area I PDU's located at The Bowl. These PDU's were integrated onto existing rocket engine test stand structures that had already been contaminated with TCE, beryllium, and a cocktail of other toxic substances. The PDU's were constructed to test the feasibility of new coal gasification, liquefaction, and hydrolysis processes, and relied on coal product that had been processed in Area IV at a former Uranium Carbide Fuel Fabrication Facility (Bldg. 4005). In addition, the early PDU's at The Bowl operated in an absence of environmental or worker safety regulatory standards, based on the "experimental" status of SSFL. The documentation suggests that workers were not provided with adequate respiratory, hearing or skin protection. Therefore, Dr. Welch's recommendation to identify VGDF exposure risks by task-specific criteria seems to apply, and I respectfully request that the Board consider adding DOE's CG personnel to the list of jobs / tasks that may be associated with VGDF exposure risks.

All supportive documentation may be downloaded as PDF's from Dropbox - including NIOSH's 1978 recommendations on CG and worker safety:

<https://www.dropbox.com/sh/ix9f0a7u26nhr5t/AABiLrSLX4dd7CtNQKjKX4Mba?dl=0>

*Note: Dropbox apparently has difficulty handling .zip files between MAC/PC users. I had no choice but to upload individual PDF's. However, they are also referenced in the bibliography, included with the attached report.

Thank you for the privilege of attending and participating in the ABTSWH meetings held in Pasco, WA. I welcome the opportunity to provide any additional information, to correct any errors that may be discovered, or to clarify any aspect of the attached document. I sincerely hope this information is helpful to the Board, and I thank you for your review on behalf of SSFL workers and EEOICPA claimants.

Sincerely,

D'Lanie Blaze

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