



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Agency Secretary

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Arnold Schwarzenegger
Governor

April 20, 2009

Mr. Thomas D. Gallacher, Director
SSFL – Safety, Health & Environmental Affairs
The Boeing Company
Santa Susana Field Laboratory
5800 Woolsey Canyon Road
Canoga Park, CA 91304-1148

**COMMENTS ON PRELIMINARY INTERIM SOURCE REMOVAL ACTION WORK PLAN
SUBMITTED IN RESPONSE TO CALIFORNIA WATER CODE SECTION 13304 ORDER – THE
BOEING COMPANY, SANTA SUSANA FIELD LABORATORY, CANOGA PARK, CA (NPDES
NO. CA0001309, CI NO. 6027, SCP NO. 1111, SITE ID NO. 2040109)**

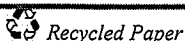
Dear Mr. Gallacher:

Los Angeles Regional Water Quality Control Board (Regional Board) staff have reviewed the February 2009 *Preliminary Interim Source Removal Action (ISRA) Work Plan Santa Susana Field Laboratory, Ventura County, California* (Work Plan). The Work Plan was submitted in response to “requirement 2” of the California Water Code section 13304 Order, dated December 3, 2008, (Order) issued to you by the Regional Board. “Requirement 2” states that you must “submit work plans to develop and select the appropriate treatment technologies to be used during source removal, including identification and delineation of the lateral and vertical extents of contamination in soil.”

In the Work Plan it is stated that “Requirement 2” will be complied with through implementation of the following tasks:

1. For outfalls 008 and 009, you will identify soil impacted areas within the watersheds contributing surface water flow to the outfalls and compile existing soil data representative of material that may provide a leachable or suspended source of contamination to surface water at the outfalls.
2. To prevent exceedances of permit limitations at outfall 008, you plan to identify potential source areas with elevated concentrations of the National Pollutant Discharge Elimination System permit chemicals of concern (COCs) which include copper, lead, and dioxins. For outfall 009, you plan to identify potential source areas with elevated concentrations of the COCs which include cadmium, copper, lead, mercury, and dioxins. The identified potential source areas are termed “Preliminary Interim Source Removal Action Preliminary Evaluation Areas” (ISRA PEAs), in the Work Plan.
3. The initial identifying criteria for ISRA PEAs will be exceedances of the Department of Toxic Substances Control (DTSC)-approved, 2005, soil background comparison concentrations in the upper 10 feet of soil. Soil background concentrations are under review by the DTSC, and may be modified in the future. If the data do not define the lateral and vertical extent of COCs potentially contributing to the permit exceedances, additional data will be collected. In areas of former operations where data for the COCs are not available, samples will be collected and data generated following existing, DTSC approved sampling and analyses methods.

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4. After potential surface water contamination source areas have been identified, the data set will be further reviewed to determine if other chemicals that are significant human and ecological health-risk drivers would potentially be mobilized during interim source removal. The technologies considered to address the target chemicals will minimize the possibility of mobilizing other chemicals that are significant health-risk drivers.
5. After soil data evaluation, additional soil data collection, and reevaluation of all relevant soil data you plan to prioritize individual ISRA PEAs according to the following criteria:
 - a. Magnitude of contamination concentrations relative to background conditions;
 - b. Estimated contaminant mass at individual ISRA PEAs;
 - c. Magnitude of exceedances relative to analytical laboratory result variability;
 - d. Specific ISRA PEA physical and chemical parameters contributing to site-specific contaminant transport;
 - e. Depth of COCs;
 - f. Proximity to drainages contributing to outfalls 008 and 009; and
 - g. Presence and type of surface cover.
6. Following ISRA PEAs identification, using the steps described above, they will be individually evaluated for appropriate remedial alternatives, and the alternatives ranked based on effectiveness, reliability, implementability, environmental impacts/sustainability, and cost. A standardized ranking system will be applied and an appropriate remedial alternative selected.
7. The results of these evaluations will be submitted to the Regional Board in compliance with "Requirement 3" of the Regional Board's California Water Code section 13304 Order, dated December 3, 2008, no later than May 1, 2009.

Several ISRA PEAs have been identified using existing data and the criteria described above. Three ISRA PEAs have been identified in the outfall 008 watershed and 12 in the outfall 009 watershed. Additional specific data gap sampling has not yet been identified for the ISRA PEAs of outfall 008, but is expected to focus on operational areas where the presence of the COCs has not been evaluated, and within the known ISRA PEAs. As with the outfall 008 watershed, additional specific data gap sampling for ISRA PEAs in the outfall 009 watershed is expected to focus on operational areas where the presence of the COCs has not been evaluated, and within the known ISRA PEAs.

The approach for selecting ISRA PEAs and evaluating and selecting remedial technologies for them, as presented in this Work Plan, is conditionally approved for use in preparing the Interim Source Removal Action Plan required in "Requirement 3" of the Regional Board's California Water Code section 13304 Order, dated December 3, 2008. However, you must comply with the following conditions:

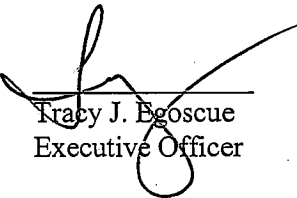
1. No later than **May 1, 2009**, you shall provide the Regional Board with a work plan identifying your approach to prevent contaminants in any soil excavated or otherwise disturbed as part of your compliance with the Order from being mobilized during wind or rain events. In addition to the COCs related to NPDES permit exceedances, the work plan must address all contaminants potentially in the soil. In lieu of submitting an individual work plan, you may present this work plan as part of the work plan required in "Requirement 2" of the Regional Board's California Water Code section 13304 Order, dated December 3, 2008.

2. The work plan required in item "1" above must include a discussion of how the responsible parties, Boeing and NASA, will coordinate responsibilities and cleanup of the watersheds related to outfalls 008 and 009.
3. All documents related to compliance with the December 3, 2008 Order must be posted on the internet concurrent with submittal to the Regional Board. In addition, all documents must include text indicating the location of the Boeing website where they can be accessed.

The Regional Board has received public comments pertinent to the ISRA Order and the tentative Waste Discharge Requirements, Cease and Desist Order, and Monitoring and Reporting Program. Regional Board staff will address the comments in the response to comments associated with the specific documents referenced.

Please telephone Mr. Peter Raftery at (213) 576-6724 or email him at praftery@waterboards.ca.gov if you have any questions.

Sincerely,



Tracy J. Egoscue
Executive Officer

cc: Mr. Gerard Abrams, Department of Toxic Substances Control, Sacramento
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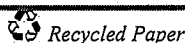


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Department of Interior, U.S. Fish and Wildlife Service
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Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
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Los Angeles and San Gabriel Rivers Watershed Council
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Los Angeles County, Department of Public Works, Environmental Programs Division
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NOAA, National Marine Fisheries Service
Simi Valley Library
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