



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Agency Secretary

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Arnold Schwarzenegger  
Governor

September 30, 2009

Mr. Steve Slaten, Site Manager  
Santa Susana Field Laboratory  
NASA JPL  
180-801  
4800 Oak Grove Drive  
Pasadena, CA 91108

Dear Mr. Slaten:

**COMMENTS ON THE EMAIL REQUESTING APPROVAL OF ADDITIONAL WORK IN THE  
OUTFALL 009 WATERSHED, EMAIL AMENDMENT TO THE FINAL INTERIM SOURCE  
REMOVAL ACTION (ISRA) WORK PLAN, CALIFORNIA WATER CODE SECTION 13304  
ORDER (NPDES NO. CA0001309, CI NO. 6027, SCP NO. 1111, SITE ID NO. 2040109)**

Los Angeles Regional Water Quality Control Board (Regional Board) staff has reviewed the September 18, 2009 email submitted to Ms. Tracy Egoscue, the Executive Officer. The email provided some general information regarding two additional target ISRA areas that were not originally included in the work plan submitted in May 2009.

Regional Board staff has reviewed the email, is aware of the two additional areas targeted, and concur that the inclusion of this work during this phase is appropriate. However, Regional Board and Department of Toxic Substances Control (DTSC) staffs have the following comments on the plan included in the email.

1. The organization of the submittal appears to be incomplete and missing some components that would be expected for a plan of this type.
2. Include a description of the background, a description of the samples collected and the associated results.
3. Provide any information available regarding the basis for the delineations that appear in the figures. Specifically, the target area for A2LF-3 does not include two of the sample locations that yielded exceedances of the lead background numbers used for evaluation. Did you sample for radionuclides?
4. Include estimates of the amount of soil to be removed and the depth of excavation.
5. Paragraph 4 of the email states that "The additional work will be conducted in "general" accordance with the Health and Safety Plan, the Soil Management Plan, and the Transportation Plan that have been developed for implementation of the ISRA work." All of the work that is associated with the ISRA activities must be completed in full compliance with the approved plans. All deviations from those approved plans must be submitted for Regional Board and DTSC approval prior to

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*Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.*

completion of the associated activity and the work must proceed in accordance with the approved modification.

6. Include legends and preparation dates on all figures.
7. Include proposed regrading details and tables of existing waste characterization data.
8. Identify adjacent soil borrow areas to be used post-excavation.
9. Include a signature of a responsible party.

If you have any questions regarding this activity, please telephone Peter Raftery at (213) 576-6724 or Cassandra Owens at (213) 576-6750.

Sincerely,



Tracy J. Egoscue  
Executive Officer

Enclosure: September 18, 2009 Email from Steve Slaten to Tracy Egoscue

cc: Mr. Rick Brausch, California Department of Toxic Substances Control  
Mr. Jim Pappas, Department of Toxic Substances Control  
Mr. Gerard Abrams, Department of Toxic Substances Control  
Mr. Buck King, Department of Toxic Substances Control  
Mr. Tom Skaug, Department of Toxic Substances Control  
Mr. Thomas Gallacher, Boeing Company  
Mr. Allen Elliot, NASA  
Ms. Merrilee Fellows, NASA  
Mr. Arthur Lenox, Boeing Company  
Ms. Lori Blair, Boeing Company

**From:** Tracy Egoscue  
**To:** sslaten@nasa.gov  
**CC:** beth.vaughan@ch2m.com,richard.s.lainhart@usace.army.mil,Cassandra Owens,...  
**Date:** 9/18/2009 2:57 PM  
**Subject:** Re: additional removals

Thank you for your email. Today is a furlough for State workers. I have copied my staff on this reply and we will turn to your request first thing Monday morning.

Tracy J. Egoscue  
Executive Officer  
Los Angeles Regional Water Quality Control Board  
320 West 4th Street, #200  
Los Angeles, CA 90013  
213.576.6605  
tegoscue@waterboards.ca.gov  
>>> "Slaten, Steven W. (HQ-RC000)" <sslaten@nasa.gov> 09/18/09 6:19 AM >>>  
Ms. Egoscue:

Implementation of ongoing remediation or site maintenance activities at SSFL will take our contractor in close proximity to two other future target ISRA areas, termed Preliminary Evaluation Areas (PEAs) in the Work Plan. These generalized PEAs are shown on Figure 1-7 (attached) of the Work Plan submittal, and are identified as PEA-A2LF-1, and PEA-A2LF-3. NASA would like to also include ISRA excavation activities in some of these areas before the rainy season begins.

Supplemental characterization of surface soil contamination in these two PEAs has continued since submittal of the Work Plan. Figures 1 and 2 (attached) show the sample results for these two PEAs, as well as the proposed delineation of the ISRA areas for excavation. The ISRA contaminants of concern that drove the delineations involved dioxins at ISRA A2LF-1 (Figure 1) and lead at ISRA A2LF-3 (Figure 2). Laboratory analytical data for these areas are summarized in attachments. Also attached is a supplemental Table 4-5 (similar tabulation to that included the Work Plan) that summarizes pertinent information about these two areas.

Regarding the ISRA AL2F-3 area (Figure 2), soils will be removed in the indicated areas to the south along the drainage feature, as part of culvert-related work that will be conducted at this location. Other portions of this ISRA area will be addressed by NASA at a future date, as part of remaining Outfall 009 ISRA activities within NASA properties at SSFL.

The additional work will be conducted in general accordance with the Health and Safety Plan, the Soil Management Plan, and the Transportation Plan that have been developed for implementation of the ISRA work. Two updated drawings to the Storm Water Pollution Prevention Plan (Figures SWPPP-1 and SWPPP-2) are also attached that show the approximate locations for BMP installations in the two additional areas.

NASA would appreciate the Regional Board's approval for including the A2LF-1 and a portion of the A2LF-3 ISRA areas into the upcoming ISRA activities that Boeing as contractor to NASA will soon be implementing. We understand that this expedient request may be inconvenient; however, NASA would greatly appreciate the Regional Board's cooperation in this regard.

We look forward to hearing from you soon.

Steve Slaten

(818) 393-6683 (office) or (818) 235-4015 (cell)

NASA SSFL Site Manager

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