



# California Regional Water Quality Control Board

## Los Angeles Region

#107376



Linda S. Adams  
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger  
Governor

May 19, 2008

Mr. Thomas D. Gallagher, Director  
Santa Susana Field Laboratory  
5800 Woolsey Canyon Road  
Canoga Park, CA 91304-1148

**ORDER PURSUANT TO WATER CODE §13383: TO PERFORM SAMPLING AND TO  
SUBMIT A TECHNICAL REPORT – BOEING COMPANY, SANTA SUSANA FIELD  
LABORATORY, CANOGA PARK (NPDES NO. CA0001309, CI NO. 6027)**

Dear Mr. Gallagher:

As you are aware, the Regional Board on March 31, 2008, received a request for additional sampling and analysis for the drainage from the Building 056 Landfill and at Empire State Atomic Development Agency (ESADA) which is located south of Former Sodium Disposal Facility (FSDF) (flows exiting this area are targeted at Outfall 006). The request was submitted by representatives from Cleanuprocketdyne.org. During a site tour on March 28, 2008, Regional Board staff, Department of Toxic Substances Control (DTSC) staff, representatives from Cleanuprocketdyne.org and Boeing staff had an opportunity to view the area.

Outfall 007 is designed to collect the storm water runoff from Building 100. The building was constructed in 1960. Building 100 was the former location of the Advanced Epithermal Thorium Reactor (AETR). The AETR was used to study nuclear reactor core configurations under low pressure conditions. Fuels used at the site included thorium or uranium. The program was terminated in 1974 and the Nuclear Regulatory Commission (NRC) released the building for unrestricted use in 1980. After decontamination and decommissioning the high bay was used for sodium fire suppression experiments. It is currently used as a high energy computer facility and the labs are used by radiation safety for a radioactive sample counting lab and instrument calibration facility. The facility included a trench next to the building which was used to burn construction debris. The trench is regulated under the Resource Conservation Recovery Act (RCRA) for soil contamination. Storm water runoff from the area has historically yielded exceedances of antimony, mercury, copper, and 2, 3, 7, 8-tetrachlorodibenzodioxin (TCDD) equivalents.

The Building 056 Landfill (landfill) is located downstream of Outfall 007. The landfill and southern debris area was used for disposal of materials generated from excavation of bedrock to create the basement for Building 056. The fill materials consist of soil and bedrock, with concrete,

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asphalt, scrap metal, wood products, and drums. Drum storage also occurred on top of the landfill. The chemicals of concern identified in the area include cadmium, selenium, lead, molybdenum, PAHs, and Aroclor 1254. Contaminants associated with the excavation debris area include Aroclor 1248, Aroclor 1254, and Aroclor 1260.

Therefore, storm water runoff samples collected at Outfall 007 which is included in the National Pollutant Discharge Elimination System (NPDES) permit will not include runoff from the Building 056 Landfill. Since there is the potential for the landfill to release contaminants of concern into the storm water runoff, the Regional Board is ordering that the storm water runoff from the area be sampled during the next five storm events.

Outfall 006 was originally positioned to capture the runoff from the Sodium Burn Pit 2 (also referred to as Former Sodium Burn Pit). ESADA is located south of the FSDF and the Sodium Burn Pit 2 area. The ESADA RCRA Facility Investigation (RFI) Site occupies 1.5 acres and adjoins the southwest corner of FSDF. The area once contained buildings, drum storage areas, and a pistol range. Between 1964 and 1968 the area was used for testing piping burst characteristics under sodium-water reaction conditions at Building 814. Later portions of the site were used for chemical drum storage, surrogate fuel pellet impact testing and as a pistol range. The storm water runoff traversing ESADA flows south west and exits the site via Outfalls 018 and subsequently Outfall 002. A site inspection indicated that there is little probability that the runoff from ESADA is not captured at Outfall 018, no new sampling has been required for this location.

Pursuant to the California Water Code section 13383, the Regional Board may require Dischargers subject to waste discharge requirements to furnish technical or monitoring reports in order to determine the effect of discharge on the water quality.

**Therefore, pursuant to Water Code section 13383, you are hereby directed** to collect storm water runoff samples of the flow exiting the Building 056 Landfill (the sample point should be located such that it collects the runoff from the Building 056 Landfill area but prior to areas where additional storm water runoff has entered the drainage way). Regional Board staff must approve the sampling location prior to any sample collection. The sampling shall be collected utilizing the protocols described in the Monitoring and Reporting Program No. CI-6027, and samples shall be analyzed for the same constituents as specified for Outfalls 003 through 010. One of the five samples collected must be analyzed for all of the priority pollutants. Sampling shall begin during the first rain event where sufficient flow is generated to collect a sample. The data from the five samples collected from the specified location will not be utilized to demonstrate compliance with the permit requirements; however, it will be used to establish reasonable potential and to determine if an additional compliance point is required.



Mr. Thomas D. Gallagher, Director  
Santa Susana Field Laboratory

- 3 -

May 19, 2008

Please be advised that failure to submit reports as required may result in the imposition of civil liability penalties by the Regional Board of up to \$10,000 per day. (Cal. Water Code § 13385(c)(1).)

Please also be advised that you have the right to file a petition with State Water Resources Control Board for review of this order. Any such petition must be filed within 30 days of the date of this notice, to the following address:

State Water Resources Control Board  
Office of Chief Counsel  
P.O. Box 100, 1001 I Street  
Sacramento, CA 95812-0100

If you have any questions about this order, please contact Cassandra Owens at (213) 576 -6750.

Sincerely,



Tracy J. Egoscue  
Executive Officer

cc: Mr. Norman Riley, Department of Toxic Substances Control  
Ms. Christina Walsh, CleanupRocketdyne.com  
Mr. Dan Hirsch, Committee to Bridge the Gap  
Mr. Gerard Abrams, Department of Toxic Substances Control  
Ms. Laura Rainey, Department of Toxic Substances Control

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