



# California Regional Water Quality Control Board

## Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams  
Agency 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

April 7, 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

Dear Mr. Gallacher:

### **REVISED TENTATIVE WASTE DISCHARGE REQUIREMENTS, FACT SHEET, AND CEASE AND DESIST – THE BOEING COMPANY, SANTA SUSANA FIELD LABORATORY, CANOGA PARK, CA, NPDES NO. CA0001309, CI NO. 6027**

Our letter dated March 16, 2009, transmitted the tentative Order for renewal of your permit to discharge wastes under the National Pollutant Discharge Elimination System (NPDES). Board staff has incorporated some minor modifications to the original documents. The modifications incorporated are listed below:

#### **Revised Tentative Board Order, Waste Discharge Requirements (WDR)**

1. The Order was previously referred to as Order No. R4-2009-00XX Amending Order No. R4-2007-0055. This has been updated to indicate that the proposed Order stands alone. It includes all of the information that was included in Order R4-2007-0055 which is currently applicable to discharges from the Santa Susana Field Laboratory (SSFL).
2. Added a new language in Finding 97, Page 38 of Revised Tentative WDR, to document the proposed implementation schedule for the California Water Code Section 13304 Order issued by Tracy Egoscue, Executive Officer of the Regional Board, on December 3, 2008.
3. Page 44, Item I.B.4, modified the compliance schedule included in the NPDES permit to comply with the SIP, which dictates that the compliance schedule for priority pollutants may not extend beyond May 17, 2010.
4. Page 58, Item IV J, include a new reopener to allow modification of the compliance schedule as specified for Outfalls 008 and 009 if the Discharger fails to comply with the California Water Code Section 13304 Order to Perform Interim/Source Removal Action of Soil in the Areas of Outfalls 008 and 009 Drainage Areas.

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### Revised Tentative Cease and Desist Order

1. Page 6, Finding 27 was modified to include a second paragraph that includes clarifying language regarding the status of the Section 13304 Order. A brief explanation regarding the proposed compliance schedule is also included in the second paragraph of that finding.
2. Page 8, Finding 42 was included to include a list of some of the activities required for compliance with the Section 13304 Order. This list of activities were used as the basis for proposing the three year compliance schedule.

### Revised Tentative Fact Sheet

1. Page 48 Paragraph 2, includes a description of the Interim Source Removal Action. The paragraph has been modified to explain that the proposed compliance schedule is for three years. This proposal is based on the activities that must be completed to comply with the Section 13304 Order for Interim/Source Removal Action. The paragraph also explains that because of the implementation plan include in the SIP, the compliance schedule included in the permit must culminate on May 17, 2010. It also clarifies that the schedule included in the proposed Cease and Desist Order provides the full three year compliance schedule that the Regional Board believes is as short as practicable.
2. Page 48, Item IX.A. The second sentence has been modified to indicate that the daily maximum effluent limitations are applicable for discharge of storm water runoff from both Outfalls 018 and 011.
3. Page 50, Item IX, B. The text has been modified to indicate that a compliance schedule is proposed for discharges from Outfalls 008 and 009 from June 10, 2009 through May 17, 2010. During that time the daily maximum effluent limitations serve as benchmarks at these two storm water discharge outfalls only.

Regional Board staff has not incorporated any updates to the Monitoring and Repeating Program issued on March 16, 2009. Therefore, that document has not been included.

In accordance with administrative procedures, this Regional Board will conduct a public hearing on the enclosed tentative orders and comments submitted in writing regarding any and all portions thereof at a two (2) day board meeting scheduled for May 7 and 8, 2009, beginning at 10:00 a.m., at the Ventura County Government Center, Board of Supervisors Hearing Room, 800 South Victoria Avenue, Ventura, California. Stakeholders are invited to contact me as the date of the board meeting approaches to obtain a more precise estimate of when the item will be called. The Board will hear any testimony pertinent to this discharge and the tentative requirements. It is expected that the Board will take action at the hearing; however, as testimony indicates, the Board, at its discretion, may order further investigation.

Written submissions pertaining to this proposed Board action must be submitted to the Regional Water Board staff no later than 5:00 p.m. on April 15, 2009, in order to be evaluated by Board staff and included in the Board's agenda folder. Timely submittal of written comments and if possible electronic versions in Word format to [cowens@waterboards.ca.gov](mailto:cowens@waterboards.ca.gov) is encouraged to ensure that all comments are accurately and fully included in the administrative record, that Board staff is able to provide timely review, and that Regional Board members have sufficient time to

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give full consideration to the comments and issues raised. The Regional Water Board chair may exclude from the record written materials received after this date. (See Cal. Code Regs., tit. 23, § 648.4.)

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

Sincerely,



Cassandra Owens, Chief  
Industrial Permitting Unit

Enclosures: Revised-Tentative Waste Discharge Requirements  
Revised Fact Sheet  
Revised Tentative Cease and Desist Order

cc: Honorable Fran Pavley, Senator, 23rd District  
Honorable Alex Padilla, Senator 20<sup>th</sup> District  
Honorable Tony Strickland, Senator 19<sup>th</sup> District  
Assembly member Bob Blumenfield, Assembly member 40<sup>th</sup> District  
Assembly member Audra Strickland, Assembly member 37<sup>th</sup> District  
Ms. Rondi Guthrie, c/o Assemblywoman Audra Strickland  
Mr. Jarrod Degonia, c/o Assembly member Cameron Smyth  
Mr. Aron Miller c/o Senator Fran Pavely  
Ms. Samatha Stevens, c/o Assemblymember Bob Blumenfield  
Environmental Protection Agency, Region 9, Permits Branch (WTR-5)  
Mr. Thomas Kelly, Environmental Protection Agency, Region 9, (WTR-5)  
Environmental Protection Agency, Region 9, Office of Radiation Programs  
Mr. Michael Lopez, U.S.D.O.E., Oakland  
Mr. Thomas Johnson, ETEC Project Manager, United States Department of Energy  
Ms. Rebecca Tadesse, Branch Chief of Materials Decommissioning, U.S. Nuclear  
Regulatory Commission  
U.S. Army Corps of Engineers  
NOAA, National Marine Fisheries Service  
Department of Interior, U.S. Fish and Wildlife Service  
Mr. Michael Levy, State Water Resources Control Board, Office of Chief Counsel  
Mr. William Paznokas, Department of Fish and Game, Region 5  
Mr. Norm Riley, Department of Toxic Substances Control, Sacramento  
Mr. Jim Pappas, Department of Toxic Substances Control, Sacramento  
Mr. Gerard Abrams, Department of Toxic Substances Control, Sacramento  
California Coastal Commission, South Coast District  
Department of Health Services, Public Water Supply Branch  
Los Angeles County, Department of Public Works, Environmental Programs Division

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**Mailing List (continued)**

Los Angeles County, Department of Health Services  
City of Los Angeles, Bureau of Engineering, Wastewater Systems Engineering Division  
ULARA Watermaster  
Water Replenishment District of Southern California  
Ventura County Air Pollution Control District  
Ventura County Public Works  
Ventura County Environmental Health Division  
Ms. Linda Parks, Ventura County Board of Supervisors  
City Manager, City of Simi Valley  
Dr. Mark Gold, Heal the Bay  
Mr. David Beckman, NRDC  
Mr. Mati Waiya, Wishtoyo Foundation  
Friends of the Los Angeles River  
Los Angeles and San Gabriel Rivers Watershed Council  
Bell Creek Homeowners Association, c/o Michael Bubman  
Bell Creek Homeowners Association, c/o Jerry Murphy  
Ms. Carol Henderson, Office Manager, Bell Canyon Association  
Ms. Barbara Johnson, Susana Knolls Homeowners, Inc.  
Ms. Gayle Demirtas, Simi Valley Library  
Mr. Howard Kaplan and Mr. Arthur Pinchey, Brandeis-Bardin Institute  
Dr. Joseph K. Lyou, Executive Director, Committee to Bridge the Gap (CBG)  
Mr. Dan Hirsch, CBG  
Mr. Sheldon Plotkin, SCFS  
Mr. Wayne Lee  
Simi Valley Library  
California State University, Northridge  
Mr. Evan Rose, L.A.U.S.D.  
Mr. Cybil Zeppieri  
Mr. Lori Zinkan  
Ms. Christina Walsh  
Ms. Teresa Jordan  
Ms. Mary Wisebrock  
Masry & Vititoe Law Offices  
Mr. Matt Hagemann, Soil/Water/Air Protection Enterprise  
Ms. Bonnie Klea  
Mr. John Farrow, M. R. Wolfe & Associates, P.C.  
Mr. Anthony Zepeda  
Ms. Lorraine Scott  
Florence and Dorri Raskin  
Ms. Heather L. Hoecherl Esq., Director of Science and Policy, Heal the Bay  
Ms. Kirsten James, MESM, Staff Scientist, Heal the Bay  
Ms. Elizabeth Crawford

**Mailing List (continued)**

Paul Costa, Boeing  
Ms. Sharon Rubalcava, Weston, Benshoof, Rochefort, Rubalcava, MacCuish, LLP  
Ms. Darlene Ruiz, Hunter Ruiz Research, Consulting and Advocacy  
Mr. Jack M. Wallace  
Mr. Adam Salkin  
Ms. Jeannie. Chari  
Ms. Nicole Donner  
Ms. Carissa Marsh, The Simi Valley Acorn  
Ms. Chris Rowe