November 20, 2017

Mr. Paul Costa  
SSFL - Safety, Health & Environmental Affairs  
The Boeing Company  
Santa Susana Field Laboratory  
5800 Woolsey Canyon Road  
Canoga Park, CA 91304-1148

Receipt of Final Human Health Risk Assessment for Surface Water Runoff Exiting the Santa Susana Field Laboratory (SSFL) via the Southern Outfalls, Ventura County, CA (Order Pursuant to California Water Code Section 13383; CA0001309, Cl No. 6027)

Dear Mr. Costa:

The Regional Board on June 24, 2015, issued a letter requiring Boeing to perform a Human Health Risk Assessment (HHRA) at Outfalls 001, 002, 008, 009, 011, 018, 019, and 020 under the requirements included in Section 13383 of the California Water Code. California Water Code section 13383 provides the Regional Board the authority to require a permittee to monitor, report, and provide other information that the Regional Board requires. On September 17, 2015, the Boeing Company submitted a HHRA Work Plan for Surface Water Runoff Exiting the SSFL via these outfalls.

The Office of Environmental Health Hazard Assessment (OEHHA) and Regional Board staff reviewed and commented on the HHRA Work Plan submitted. On January 28, 2016, OEHHA and Regional Board comments were submitted to Boeing including directions to revise the Work Plan. On March 31, 2016, Geosyntec Consultants on behalf of Boeing submitted the revised Work Plan incorporating the requested revisions.

In a letter dated April 21, 2016, the Regional Board solicited public comments on the revised HHRA Work Plan. Comments were received from Ms. Christina Walsh, Ms. Christine Rowe, Heal the Bay, and Rocketdyne Cleanup Coalition (Physicians for Social Responsibility-Los Angeles, Southern California Federation of Scientists, Committee to Bridge the Gap, Teens Against Toxins, and the Aerospace Contamination Museum of Education). Regional Board working with OEHHA staff responded to the comments on September 15, 2016, and approved the HHRA Work Plan.

GeoSyntec Consultants on behalf of Boeing submitted on April 28, 2017, a HHRA for Surface Water Outfalls exiting the SSFL via the Southern Outfalls. The document was reviewed by Regional Board and OEHHA staff. On June 28, 2017, comments from OEHHA. The conclusions presented were:
• OEHHA agrees with the human health risk and hazard estimates.
• OEHHA is not fully convinced that potential downstream exposures to aquatic organisms has been adequately evaluated.

To address conclusion 2 above, an addendum to the HHRA was submitted on September 22, 2017 and modified on October 23, 2017. On October 29, 2017, after reviewing the addendum, OEHHA staff in the summary of results noted:

• Geosyntec has rigorously analyzed the projected flows in the various tributaries and show that SSFL’s contribution to the total flow at 2 locations is 1% or less.
• Geosyntec multiplied the pollutant concentrations at the outfalls by the appropriate dilution factor to estimate the pollutant concentrations attributable to SSFL at Arroyo Simi at the confluence with Meier Canyon and the Sepulveda Basin. The results (Tables 7 and 8, respectively) were compared to California Toxics Rule Criteria for Human Consumption of Aquatic Organisms.
• Meeting NPDES permit requirements for all surface water discharges from the facility without dilutions should achieve the necessary protection of aquatic life.

This letter documents receipt of the final HHRA that was completed as per the approved HHRA Work Plan dated September 15, 2016. Documents related to the HHRA including the final Report are posted on the Regional Board web site.

If you have any questions, please contact Cassandra Owens at (213) 576-6750 or Cassandra.Owens@waterboards.ca.gov or Mazhar Ali at (213) 576-6652 or Mazhar.Ali@waterboards.ca.gov

Sincerely,

Samuel Unger, P.E.
Executive Officer

Attachment: Final HHRA Report

cc: Mr. David Smith, Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Ms. Robyn Stuber, Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Ms. Becky Mitschele, Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Mr. Kenneth Wong, U.S. Army Corps of Engineers
Mr. Bryant Chesney, NOAA, National Marine Fisheries Service
Mr. Jeff Phillips, Department of Interior, U.S. Fish and Wildlife Service
Mr. William Paznokas, Department of Fish and Wildlife, Region 5
Department of Public Health, Sanitary Engineering Section
Ms. Teresa Henry, California Coastal Commission, South Coast Region
South Coast Air Quality Management District
Mr. Theodore Johnson, Water Replenishment District of Southern California
Los Angeles County, Department of Public Works, Waste Management Division
Mailing List (continued)

Ms. Sutida Bergguist, State Water Resources Control Board, Division of Drinking Water
Ms. Sara Sikich, Heal the Bay
Mr. Bruce Reznik, Los Angeles WaterKeeper
Ms. Johanna Dryer, Natural Resources Defense Council
Mr. Mark Malinowski, Department of Toxic Substances Control
Mr. Roger Paulson, Department of Toxic Substances Control
Mr. Tom Seckington, Department of Toxic Substances Control
Mr. Daniel Cooper, Lawyers for Clean Water
Mr. Jeffrey Wokurka, Boeing
Mr. Pete Zobra, National Aeronautics and Space Administration
Mr. John Jones, United States Department of Energy
Mr. Michael Bubman, c/o Bell Creek Homeowners Association
Mr. Paul Carpenter, Department of Toxic Substances Control
Ms. Mary Meyer, California Department of Fish and Wild Life
Ms. Christine Found-Jackson, California Department of Fish and Wild Life
Environmental Protection Agency, Region 9, Office of Radiation Programs
Ms. Jennifer Fordyce, Office of Chief Counsel, State Water Resources Control Board
NPDES Wastewater Unit, Div. of Water Quality, State Water Resources Control Board
Ms. Jeannie Chan
Mr. David W. Dassler, Boeing
Ms. Elizabeth Crawford
Ms. Nicole Dollen Ventura County Planning Division
Ms. Ginn Doose
Mr. Matt Flagemann, Soil/Water/Air Protection Enterprise
Mr. Dan Hirsch, Committee to Bridge the Gap
Ms. Barbara Johnson, Susana Knolls Homeowners, Inc.
Dr. Michael Josselyn, WRA, Inc.
Mr. Daniel Maccabee, Brandeis-Bardin Institute
Mr. Sheldon Plotkin, Southern California Federation of Scientists’
Ms. Bunny Raskin
Ms. Chris Rowe
Mr. Adam Salkin
Mr. Mathew Sanders, Paul, Hastings, Janofsky & Walker LLP
Ms. Lorraine Scott
Dr. Michael Stenstrom, SSFL Stormwater Expert Panel
Ms. Rebecca Tadese, Branch Chief of Materials Decommissioning, U.S. Nuclear Regulatory Commission
Mr. Rick Vergutz, Water & Environmental Resources Section, Ventura County Watershed Protection District
Mr. Mati Waiya, Wishtoyo Foundation
Ms. Christina Walsh, SaveSantaSusana.org
Dr. Daniel Wiseman, West Hills Neighborhood Council-Santa Monica Mountains Area Committee
California State University, Northridge
City of Los Angeles, Bureau of Engineering, Wastewater Systems Engineering Division
Friends of the Los Angeles River Los Angeles and San Gabriel Rivers Watershed Council Los Angeles County, Department of Health Services
Los Angeles County, Department of Public Works, Environmental Programs Division
Mailing List (continued)

Masry & Vititoe Law Offices
Simi Valley Library
U.S. Army Corps of Engineers
ULARA Watermaster
Ventura County Air Pollution Control District
Ventura County Environmental Health Division
Ventura County Public Works
Mr. Alec Uzemeck, GAG Chair
Dr. Ronald Ziman
Mr. A. J. Greenstein
Ms. Teresa Jordan
Mr. Wayne Lee
Mr. John Luker
Ms. Carissa Marsh, The Simi Valley Acorn
Ms. Marie Mason
Mr. Jack M. Wallace
Ms. Marge Weems
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Mr. Anthony Zepeda
Mr. Cybil Zeppieri
Mr. Lori Zinkan
Ms. Elizabeth Zlotnik
Mr. Peter Weiner, Paul, Hastings, Janofsky & Walker LLP
City Manager, Simi Valley
Mr. Greg Smith
Mr. Richard Mathews
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Ms. Cristine Peterson
Mr. Isaac Levy
Mr. William Preston Bowling
Ms. Bonnie Klea
Ms. Deena Parry
Ms. Cindi Gortner
Ms. Margery Brown
Rocketdyne Cleanup Coalition
Mr. Ben Carrier
Ms. Rubin Marcia, Department of Toxic Substances Control
Ms. Kamara Sams, Boeing
Ms. Ruth Custance, Geosyntec
Mr. Brandon Streets, Geosyntech
Mr. Jay Strear, American Jewish University
Ms. Deborah Schooch
Mr. Russ Edmonson, Department of Toxic Substances Control
Ms. Susana Lagudis, Los Angeles Regional Water Quality Control Board
Mr. Kip Drabeck, Chatsworth Lake Manor Citizens Committee