

Via Federal Express

April 30, 2009  
In reply refer to SHEA-108613

Regional Water Quality Control Board  
Los Angeles Region  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013

Attention: Peter Raftery

Subject: Clarifications regarding RWQCB Comments on Preliminary Interim Source Removal Action (ISRA) Work Plan Submitted in Response to California Water Code Section 13304 Order (NPDES NO. CA0001309, CI NO. 6027, SCP NO. 1111, SITE ID NO. 2040109)

Dear Mr. Raftery:

The Boeing Company (Boeing), on behalf of Boeing and the National Aeronautics and Space Administration (NASA), wishes to provide the following clarifications regarding the above-mentioned comment letter on the Preliminary Interim Source Removal Action (ISRA) Work Plan submitted to the RWQCB on February 13, 2009. These clarifications are:

1. Item 7 (of the implementation tasks) states that results of evaluations performed to identify source removal areas will be included in the ISRA Work Plan due May 1, 2009. Boeing would like to clarify that the May Work Plan will include results for all evaluations completed to date, and a process and schedule to complete cleanup actions by 2012. As discussed at meetings between RWQCB, Boeing, and NASA held on April 15<sup>th</sup> and 22<sup>nd</sup>, and as described in the February Work Plan, some source area evaluations are pending completion of the Northern Drainage cleanup work and additional sampling results (currently ongoing). Completion of both of these actions is needed to confidently recommend additional ISRA cleanup areas. The May Work Plan will clarify these constraints and outline the schedule for completion. The schedule will include preparation of addenda to the May Work Plan that summarizes the additional sampling activities and presents the recommended remedial plan for the identified ISRA cleanup areas. The addenda will be submitted to the RWQCB for approval.
2. Item 1 (of the approval conditions) states that a work plan identifying the approach to prevent contaminants in any soil excavated or otherwise disturbed from being mobilized during wind or rain events can be submitted as part of the



work plan specified in Requirement 2 of the Order (the February Work Plan). Boeing wishes to clarify that the comment meant to reference Requirement 3 of the Order (the May Work Plan). Also, Boeing would like to clarify that the term "contaminants" indicated in this comment includes both ISRA COCs and collocated RCRA risk drivers/contributors within the proposed ISRA Area or within an area that would be disturbed by the proposed cleanup activities.

3. Item 3 (of the approval conditions) specifies that all documents related to compliance with the Order must be posted concurrently with submittal to the RWQCB. Boeing respectfully requests 10 working days for web posting due to upload processing requirements. The following is the link to where documents will be posted:

[http://www.boeing.com/aboutus/environment/santa\\_susana/isra.html](http://www.boeing.com/aboutus/environment/santa_susana/isra.html)

Boeing respectfully requests a response to these clarifications at your earliest convenience. Please do not hesitate to contact Lori Blair at 818-466-8741 with any questions or comments.

Very truly yours,



Thomas D. Gallacher  
Director, Santa Susana Field Laboratory  
Environment, Health and Safety

LNB:bjc

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