

APPENDIX A
REGULATORY CORRESPONDENCE

APPENDIX A – Regulatory Correspondence

Table of Contents

1. RWQCB, 2008. California Water Code Section 13304 Order to Perform Interim/Source Removal Action of Soil in the Areas of Outfalls 008 and 009 Drainage Areas, The Boeing Company Santa Susana Field Laboratory, Unincorporated Ventura County, California (SCP No. 1111, Site ID No. 2040109). December 3.
2. DTSC, 2009. Preliminary Interim Source Removal Action (ISRA) Work Plan, Santa Susana Field Laboratory, Ventura County, California, dated February 2009, Letter to RWQCB. March 19.
3. Damon Wing, Ventura County, 2009. Comments on Interim Source Removal Action Preliminary Work Plan.doc, Email to RWQCB. April 1.
4. RWQCB, 2009. Comments on Preliminary Interim Source Removal Action Work Plan Submitted in Response to California Water Code Section 13304 Order – The Boeing Company, Santa Susana Field Laboratory, Canoga Park, CA (NPDES No. CA0001309, CI No. 6027, SCP No. 1111, Site ID No. 2040109), Letter to Boeing. April 20.
5. Boeing, 2009. 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), Letter to RWQCB. April 30.
6. Boeing, 2009. Pre-Certified 401 Notification, The Boeing Company, Santa Susana Field Laboratory, Interim Source Removal Action - Outfalls 008 and 009 Watersheds, Ventura County, California. May 22.
7. Boeing, 2009. U.S. Army Permit -- NWP 38 Pre-Construction Notification Interim Source Removal Action, Outfalls 008 and 009 Watersheds, Santa Susana Field Laboratory, Ventura County, California. May 22.
8. RWQCB, 2009. Approval of 10 Day Web Uploading Deadline for Documents Related to Outfalls 008 and 009 -- The Boeing Company, Santa Susana Field Laboratory, Canoga Park, CA (NPDES NO. CA0001309, CI NO. 6027, SCP NO. 1111, SITE ID NO. 2040109), Letter to Boeing. May 22.
9. Boeing, 2009. Work Scope Information and Summary, The Boeing Company, Santa Susana Field Laboratory, Interim Source Removal Action - Outfalls 008 and 009 Watersheds, SAA 1600-2003-5052-R5 and Amendments, Ventura County, California, Letter to CDFG. May 28.

10. CDFG, 2009. CDFG approval of HV SAA extension for 2009, Email to MWH. May 28.
11. Boeing, 2009. Response to question: ISRA Excavation Areas Outfall 009, Maps, and Volumes, Email to RWQCB. June 3.
12. DTSC, 2009. Final Interim Source Removal Action (ISRA) Work Plan, Santa Susana Field Laboratory, Ventura County, California, dated May 2009, Letter to RWQCB. June 4.
13. RWQCB, 2009. Comments and Requirements Related to the Final Interim Source Removal Action Work Plan Submitted in Response to California Water Code Section 13304 Order – The Boeing Company, Santa Susana Field Laboratory, Canoga Park, CA (NPDES NO. CA0001309, CI NO. 6027, SCP NO. 1111, Site ID NO. 2040109), Letter to Boeing. June 5.
14. CDFG, 2009. [States that ISRA work is already covered under Boeing's existing SAA], Email to MWH. June 7.
15. RWQCB, 2009. Department of Toxic Substances Control Comments on the Final Interim Source Removal Action Work Plan Submitted in Response to California Water Code Section 13304 Order – The Boeing Company, Santa Susana Field Laboratory, Canoga Park, CA (NPDES NO. CA0001309, CI NO. 6027, SCP NO. 1111, Site ID NO. 2040109), Letter to Boeing. June 10.
16. MWH, 2009. Addendum to the Final 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); Response to RWQCB and DTSC Comments on the Final ISRA Work Plan, Letter to RWQCB. June 19.
17. RWQCB, 2009. Request for More Information: Pre-Certification Notification for Interim Source Removal Action (ISRA) – Outfalls 008 and 009 Watersheds, Ventura County, California (File No. 09-127), Letter to Boeing. June 19.
18. Boeing, 2009. Clean Water Act Section 401 Pre-Certification Notification for Interim Source Removal Action (ISRA) - Outfalls 008 and 009 Watersheds, Santa Susana Field Laboratory, Ventura County, California, Response to Request for More Information, Letter to RWQCB. June 26.
19. Boeing, 2009. U.S. Army Permit, Modified Notification Application and Supplemental Information, NWP 38 Pre-Construction Notification, Interim Source Removal Action, Outfalls 008 and 009 Watersheds, Santa Susana Field Laboratory, Ventura County, California. June 26.
20. RWQCB, 2009. Final Approval of and Comments on Addendum to the Final Interim Source Removal Action Work Plan Submitted in Response to California Water Code Section 13304 Order – The Boeing Company, Santa Susana Field Laboratory,

- Canoga Park, CA (NPDES NO. CA0001309, CI NO. 6027, SCP NO. 1111, Site ID NO. 2040109), Letter to Boeing. July 7.
21. RWQCB, 2009. RWQCB comments/questions on various plans, Email to Boeing. July 14.
 22. SWRCB, 2009. Receipt of Your Notice of Intent (NOI), Letter to Boeing. July 21.
 23. RWQCB, 2009. Comments on Storm Water Pollution Prevention Plan for ISRA Submitted in Response to California Water Code Section 13304 Order – The Boeing Company, SSFL, Canoga Park, CA (NPDES No. CA0001309, CI No. 6027, SCP No. 1111, Site ID No. 2040109, Letter to Boeing. July 30.
 24. DTSC, 2009. Interim Source Removal Action (ISRA), Soil Management Plan, Santa Susana Field Laboratory, Ventura County, California, dated July 2009, Letter to RWQCB. August 3.
 25. RWQCB, 2009. Pre-Certification for Interim Source Removal Action (ISRA) - Outfalls 008 and 009 Watersheds, Ventura County, California (File No. 09-127), Letter to Boeing. August 11.
 26. RWQCB, 2009. Comments on Soil Management Plan for ISRA Submitted in Response to California Water Code Section 13304 Order – The Boeing Company, SSFL, Canoga Park, CA (NPDES No. CA0001309, CI No. 6027, SCP No. 1111, Site ID No. 2040109), Letter to Boeing. August 13.
 27. Boeing, 2009. Fugitive Dust Control Measures, Interim Source Removal Action (ISRA), California Water Code Section 13304 Order (NPDES NO. CA0001309, CI NO. 6027, SCP NO. 1111, Site ID No. 3040109), Letter to RWQCB. August 17.
 28. MWH, 2009. Response to DTSC Comments on ISRA Soil Management Plan; Addendum to ISRA Soil Management Plan. August 17.
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 30. MWH, 2009. Response to RWQCB Comments on ISRA Supplemental Information and Plans. August 17.
 31. Boeing, 2009. Outfall 008 Archaeological Assessment, Interim Source Removal Action (ISRA) in Response to a California Water Code Section 13304 Order, The Boeing Company, Santa Susana Field Laboratory, Canoga Park, CA (NPDES NO. CA0001309, CI NO. 6027, SCP NO. 1111, SITE ID NO. 2040109), Letter to RWQCB. August 24.

32. Ventura County, 2009. Tree Permit AD09-0086. August 24.
33. ACOE, 2009. Department of the Army Nationwide Permit Authorization, Letter to Boeing. August 25.
34. MWH, 2009. Response to RWQCB Comments on ISRA Storm Water Pollution Prevention Plan, Letter to RWQCB. August 31.
35. MWH, 2009. HVS-2A Soil Collapse Feature and Pipeline Removal Summary and Plan, Letter 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). September 18.
36. NASA, 2009. Additional Removals [Areas in the Outfall 009 Watershed], Email to RWQCB. September 18.
37. ACOE, 2009. Confirmation that additional proposed work at A2LF-1 is outside ACOE jurisdiction, Email to MWH. September 25.
38. RWQCB, 2009. Approval of HVS-2A Soil Collapse Feature and Pipeline Removal Summary and Plan, Letter 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), Letter to Boeing. September 29.
39. DTSC, 2009. [Interim Source Removal Action (ISRA), HVS-2A Soil Collapse Feature and Pipeline Removal Summary and Plan, Santa Susana Field Laboratory, Ventura County, California], Letter to RWQCB. September 26.
40. RWQCB, 2009. 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), Letter to NASA. September 30.
41. CH2M Hill, 2009. Response to RWQCB Comments (September 30, 2009) on Amendment Request (September 18, 2009) to the Approved May 2009 Final Interim Source Removal Action (ISRA) Work Plan. October 14.
42. DTSC, 2009. DTSC Concurrence with Proposal for Additional Outfall 009 Soil Removals, Email to RWQCB & Boeing. November 4.
43. RWQCB, 2009. Approval of Amendment to the Final Interim Source Removal Action (ISRA) Work Plan Inclusion of A1LF-1 and A2LF-3 Areas Within the Watershed of Outfall 009, California Water Code Section 13304 Order (NPDES No. CA0001309, CI No. 6027, SCP No. 1111, Site ID No. 2040109), Letter to Boeing. November 4.

44. RWQCB, 2010. Approval of Performance Monitoring Sampling and Analysis Plan Final 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), Letter to Boeing. February 3.



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Cal/EPA Secretary

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Arnold Schwarzenegger
Governor

December 3, 2008

Mr. Thomas D. Gallacher, Director
SSFL – Safety, Health & Environmental Affairs
The Boeing Company
Santa Susana Field Laboratory
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Certified Mail
Return Receipt Requested
Claim No. 7008 1830 0004 3360 0939

CALIFORNIA WATER CODE SECTION 13304 ORDER TO PERFORM INTERIM/SOURCE REMOVAL ACTION OF SOIL IN THE AREAS OF OUTFALLS 008 AND 009 DRAINAGE AREAS, THE BOEING COMPANY SANTA SUSANA FIELD LABORATORY, UNINCORPORATED VENTURA COUNTY, CALIFORNIA (SCP NO. 1111, SITE ID NO. 2040109)

Dear Mr. Gallacher:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board), is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura County, including the above-referenced project site.

The Santa Susana Field Laboratory (SSFL) occupies approximately 2,850 acres and is located at the top of Woolsey Canyon Road in the Simi Hills, Ventura County, California. The SSFL is jointly owned by The Boeing Company (Boeing) and the United States of America. The National Aeronautics and Space Administration (NASA) administers the portion of the property owned by the federal government. The site is divided into four administrative areas (Areas I, II, III, and IV) and undeveloped land areas to both the north and south. The NASA property includes a portion of Area I and all of Area II. Ninety acres of Areas IV are leased to the United States Department of Energy (DOE).

Boeing and its predecessors' operations at SSFL since 1950 include research, development, assembly, disassembly, and testing of nuclear reactors, rocket engines, and chemical lasers. NASA operations included rocket engine assembly and testing, and propellant and fuel storage and loading. DOE conducted past operations in research and development of energy related programs, and seismic testing experiments. Current DOE activities onsite are solely related to facility closure, environmental remediation, and restoration.

Regional Board Order R4-2004-0111 and previous orders originally permitted discharges of excess water at the SSFL from its groundwater treatment system, industrial activities, onsite wastewater reclamation system, and rainfall runoff that has the potential to contain pollutants from the facilities. Most recently, the only wastewater generated onsite and discharged to the streambeds is treated groundwater which is associated with activities that are being regulated by the Department of Toxic Substances Control (DTSC) under the Resource Conservation and Recovery Act (RCRA). All other wastewater discharges have been terminated. However, storm water traversing the site had yielded exceedances of water quality based effluent limits in the National Pollutant Discharge Elimination System (NPDES) Permit for the facility.

California Environmental Protection Agency



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

Only storm water is discharged through Outfalls 008 and 009 (see attached map):

- Discharge Outfall 008 – This outfall captures storm water runoff from an area that has previously been used for operations that involved perchlorate and other contaminants of concern. Storm water from Happy Valley flows to Dayton Canyon Creek. The flow from Dayton Canyon Creek joins Chatsworth Creek, which flows south to Bell Creek southwest of the intersection of Shoup Avenue and Sherman Way. Bell Creek flows east to the Los Angeles River. This area has since undergone an “interim measure cleanup”, which was completed in September 2004, under the direction of DTSC.
- Discharge Outfall 009 – The watershed that drains into Outfall 009 is on Boeing and NASA property and begins near the entrance to the property and traverses several potential areas of concern. The Outfall collects storm water runoff from the Area 1 and Area 2 Landfills, and the former LOX plant located on NASA owned property. In addition, Outfall 009 picks up storm water run on from Sage Ranch where agricultural operations took place and a gun shooting range was located. This outfall drains to Arroyo Simi.

Boeing has violated Waste Discharge Requirements contained in Order No. R4-2004-0111, as amended by Order Nos. R4-2006-0008, R4-2006-0036, and R4-2007-0055 (hereinafter Order No. R4-0111) by discharging storm water and/or permitting storm water to be discharged to waters of the State, which contains wastes that have chronically exceeded effluent limitations for 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD) toxic equivalent (TEQ), heavy metals (e.g., copper, lead, and cadmium), and other pollutants (e.g., oil and grease and pH) at Outfalls 008 and 009 from 2005 through 2008.

The Regional Board has determined that an order pursuant to Water Code section 13304 is the most appropriate manner to achieve compliance with the requirements of Order No. R4-2004-0111. The Regional Board's objective is that contaminated soil are to be removed in order to eliminate the contaminants that have resulted in violations of effluent limitations and are an ongoing source of contaminants, creating a condition of pollution or nuisance. Site-wide cleanup of soil, soil vapor, and groundwater will continue under regulatory oversight by the DTSC.

Therefore, pursuant to Section 13304 of the Water Code, Boeing is hereby ordered to cleanup and abate the waste that are discharging to waters of the State, minimize impacts to the streambed adjacent habitat during the cleanup, protect the water quality during and after the cleanup, and restore the streambed and surrounding habitat following the cleanup.

Compliance with this order shall include, but not be limited to completing the requirements listed below. Boeing shall:

1. Commence activities necessary to undertake source removal of wastes that are causing or contributing to violations of limitations contained in Order No. R4-2004-0111 at Outfalls 008 and 009, subject to Regional Board approval of the plans required by paragraphs 2 and 3, below.
2. Submit work plans to develop and select the appropriate treatment technologies to be used during source removal, including identification and delineation of the lateral and vertical extents of contaminants in soil, by **February 15, 2009** for the Regional Board's approval.
3. Submit for the Regional Board's approval an interim source removal action (ISRA) plan by **May 1, 2009**.
4. Submit a report documenting compliance with the removal process and detailing the results of confirmation soil samples following the completion of the interim source removal of impacted soil from the areas for Outfalls 008 and 009 watersheds. The Regional Board will determine the submittal due date for this report upon approval of the ISRA.
5. Reimburse the Regional Board for all reasonable costs incurred by the Regional Board staff to oversee soil cleanup, abatement of the effects thereof, or other remedial actions.
6. Communicate and work cooperatively with NASA for the proposed ISRA necessary for the NASA Area I and II property located within the Outfall 009 Drainage Area. The Regional Board understands that Boeing may undertake the actions under this order on the NASA property only with the approval of NASA.
7. All proposed projects located within state or federal jurisdictional waters must comply with the applicable sections of the federal Clean Water Act (CWA) and California's Porter Cologne Water Quality Control Act (Porter Cologne). The United States Army Corps of Engineers (USACOE) (CWA Section 404 permitting) and the Regional Board (CWA Section 401 water quality certifications) may permit fill activities in waters of the United States under the CWA. The Regional Board may also permit fill activities in waters of the State of California under Porter Cologne by issuing Waste Discharge Requirements (WDR). Further, the California Department of Fish and Game (F&G), through streambed alteration agreements, also has jurisdiction over fill projects that affect waters of the State. These agencies must be notified of any plans that could impact these waters to determine if permitting will be required.

Failure to comply with this Order may result in imposition of civil liabilities, either administratively by the Regional Board or judicially by the Superior Court in accordance with Section 13350 of the California Water Code, and/or referral to the Attorney General of the State of California for such action as he may deem appropriate.

Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title

California Environmental Protection Agency



Mr. Thomas D. Gallacher
The Boeing Company

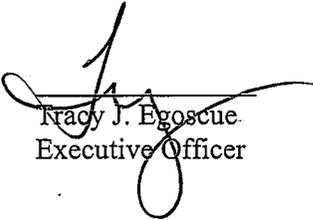
- 4 -

December 3, 2008

23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

If you have any questions, please contact Mr. David Bacharowski at (213) 576-6607.

Sincerely,



Tracy J. Egoscue
Executive Officer

California Environmental Protection Agency

 Recycled Paper

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

cc: Honorable Fran Pavley, Senator
Honorable Julia Brownley, Assemblymember
Ms. Rondi Guthrie, c/o Assemblywoman Audra Strickland
U. S. 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. 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
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. Jerome Raskin, Pierce College
Mr. Sheldon Plotkin, SCFS

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Department of Toxic Substances Control



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Governor

March 19, 2009

Ms. Cassandra Owens
Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
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Preliminary Interim Source Removal Action (ISRA) Work Plan, Santa Susana Field Laboratory, Ventura County, California, dated February 2009

Dear Ms. Owens:

Staff from the Department of Toxic Substances Control (DTSC) Santa Susana Field Laboratory (SSFL) team reviewed the *Preliminary Interim Source Removal Action (ISRA) Work Plan (Work Plan)* submitted by The Boeing Company (Boeing).

It is our understanding that the project described in the *Work Plan* is being carried out pursuant to a Cleanup and Abatement Order (CAO) issued to Boeing by the Regional Water Quality Control Board (RWCQB) on December 3, 2008, and that the CAO was issued in response to exceedances of NPDES surface water outfall permit limits for the Happy Valley drainage (Outfall 008; lead) and the Northern drainage (Outfall 009; copper, lead, dioxins, pH, and oil & grease). The CAO requires Boeing to address the soil source areas that contribute to releases of contaminants at levels that exceed NPDES limits. The areas that drain to Outfall 008 and 009 are currently under investigation by DTSC for chemical and potential radiological contamination. Administrative Area I drains into Outfall 8; Administrative Areas I, II, and III drain into Outfall 009.

There are several surficial media chemical site characterization reports that have been submitted to date that are currently under various stages of review by DTSC. The last of these characterization reports is to be submitted in 2011. We anticipate this site characterization work to be completed by July 2012. As part of the investigation, DTSC will be requiring that a comprehensive historical site assessment (HSA) of all operations involving the management of radioactive materials in Areas I, II and III be submitted for DTSC review and approval. The purpose of the HSA is to assist in determining the appropriate scope of the work plan for the characterization of radionuclides in these areas.

The *ISRA Work Plan* states that DTSC soil background comparison concentrations from the Santa Susana Field Laboratory Standardized Risk Assessment Methodology (SRAM) Work Plan, Revision 2 were used to evaluate soil sample data and the identification of preliminary ISRA evaluation areas (PEAs). Although stated in the *Work Plan*, I want to emphasize that these soil background concentrations are under review by DTSC and may be modified in the future. The results of the chemical background study underway by DTSC should be available in Spring 2010. We anticipate the results for the radiological background study by U.S. EPA Region IX should be available in Spring 2010 as well.

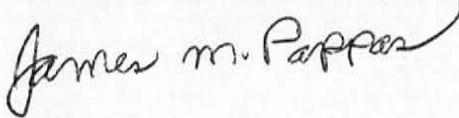
Because there has not been a comprehensive HSA of all operations involving the management of radioactive materials or a preliminary assessment of the presence of radionuclides in Areas I, II and III, we are recommending that excavated soil transported from the project site for disposal be screened for radionuclides according to guidelines and procedures approved by the California Department of Public Health. The radionuclide screening general procedures should be presented in the *Final ISRA Work Plan* due to the RWQCB on May 1, 2009, and specific screening procedures should be presented in the associated *Soil Management Plan* due prior to project start.

Finally, we wish to state very clearly that the removal of source materials from the affected watersheds to address NPDES exceedances at Outfalls 008 and 009 will not necessarily mean that those areas will meet Senate Bill (SB) 990 standards upon completion of the CAO-directed work. It may be necessary for Boeing and its SSFL partners to undertake additional removal work at these same locations in the future in order to meet SB 990 cleanup standards to be prescribed by DTSC at a later date. We will not be able to determine whether additional cleanup will be required until we complete the characterization of the areas involved and the corresponding human health and ecological risk assessments.

Ms. Cassandra Owens
March 19, 2009
Page 3

If you have any questions regarding these comments, please contact Mr. Chris Sherman at (916) 255-3673, or at the address below.

Sincerely,



James M. Pappas, P.E.
Project Manager
SSFL Project Team

cc: Ms. Tracy Egoscue
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Ms. Cassandra Owens
March 19, 2009
Page 4

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Office of External Affairs
Department of Toxic Substances Control
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From: Damon Wing [Damon.Wing@ventura.org]
Sent: Wednesday, April 01, 2009 6:00 PM
To: tegoscue@waterboards.ca.gov
Subject: SSFL ISRA Work Plan Comments
Attachments: Comments on Interim Source Removal Action Preliminary Work Plan.doc

Hi Tracy,

Thank you for the opportunity to comment on the Draft Interim Source Removal Work Plan. Comments are attached. Please let me know if you have any questions.

Best regards,
Damon Wing

Comments on the February 2009 Interim Source Removal Action (ISRA) Work Plan

The intent of the Interim Source Removal Action Cleanup and Abatement Order is admirable and appears to be a step toward meeting the NPDES permit requirements through direct removal of contaminants. While the Preliminary Work Plan may be successful at removing the pollution Constituents of Concern (COCs) which are in exceedance of the NPDES permits, the Plan does not include the plethora of soil contaminants that have been the crux of concern of the community and regulatory agencies. Lead, copper, and dioxins are only part of the soil contamination problem. Without including all constituents of concern, ISRA may be an incomplete action for cleaning up the contamination, and furthermore, if there is no screening for these contaminants, it may expose both remediation workers and the public to unknown hazards during removal, transport, and disposal.

With multiple agencies, multiple jurisdictions, and varying levels of technical expertise, collaboration with the U.S. EPA and the California Department of Toxic Substances Control will be necessary to assure the complete and appropriate removal of contaminated soil. Most critically, the ISRA should address contaminants, both chemical and radionuclide, on a constituent by constituent basis.

The Water Board's Cleanup and Abatement Order to reach permit compliance is a positive step because the plan is to remove contaminants this year, thus addressing some public health concerns. It will be important to explain how this will comport with the Cease and Desist Order, to determine if the proposed ENTS will still be necessary or if it should be designed on a much reduced scale. Knowing how the Cleanup and Abatement Order will comport with the Cease and Desist Order will also help define how the Water Board will work together with the U.S. EPA and DTSC to address the timelines and comprehensive actions. The County of Ventura will also need to be part of these discussions as it issues grading permits and would be acting as the lead agency for the ENTS project.

The following are brief comments based on an initial review of the February 2009 Preliminary ISRA Work Plan:

Sec. 1.1.1 – SSFL Ownership and History, pg. 1-2:

The Work Plan states that surface water discharges from Area IV do not flow to either Outfall 008 or Outfall 009. It should be noted that there has been ongoing concern about contaminants from Area IV migrating, via aerial deposition and/or physical deposition, to other areas of the site, including Area I and Area II.

Sec. 1.1.2 – Existing Conditions, pg. 1-5:

In addition to VOCs (primarily TCE and associated degradation products), perchlorate, and tritium, gross alpha and gross beta have been detected in groundwater.

Sec 1.3 – Objective and Scope, pg. 1-7:

The objective of the ISRA RWQCB CAO is limited to identifying, evaluating, and remediating areas of contaminated soils of only the COCs that have resulted in exceedances of NPDES permit limits and benchmarks. It fails to address the other pollutants that contaminate the site. Comprehensive identification, evaluation, and remediation of soil contaminated by chemical and radiological materials are a must. Additionally, there should be enforceable NPDES permit limits rather than benchmarks.

Sec. 3.2 – Potential Source Area Identification, pg. 3-2:

There are several items that need to be addressed in this section. Overall, this section needs to be explicit, highly detailed, and specific. Currently, it is not, and will therefore be difficult for the general public to understand, for there to be accountability, and for there to be accurate and enforceable measures. Because of migrations of contaminants from adjacent Areas and because of the potential for there to be contaminants not addressed in the NPDES COCs from the subject sites themselves, a comprehensive suite of contaminants should be the basis for investigation.

- 1) Data on the background levels should come from both DTSC and EPA since EPA has their experts working on the radiological background.
- 2) Preliminary Evaluation Areas evaluated should include chemical and radiological contributors.
- 3) RCRA risk drivers and contributors should be specifically listed. Please define “overlap” in regard to ISRA PEAs and RCRA risk drivers and contributors. Is this limited to the Water Board’s COCs for Outfalls 008 and 009?
- 4) Nickel, VOCs, thallium, silver, PCBs, SVOCs, PAHs, Chromium, TPHs, zinc, arsenic, cadmium, selenium, barium, mercury, cobalt, molybdenum, vanadium, bezidine, Cesium-137, Strontium-90, thorium, gross alpha, and gross beta should be listed and evaluated.
- 5) “based on assessments as presented in the RFI Group reports” is extremely generally. This needs to be specific. First, the RFI Group reports have not all been completed. For example, the cited Group 1A RFI Group Report has not yet been posted on the DTSC website for public review and comment, and the RFI Group 1B Report does not yet seem to exist. Second, there is not general public agreement with the assessment of those reports that have been completed.
- 6) Existing RFI Group reports still need to be updated to reflect state law (SB 990).
- 7) No CERLA standards have been referenced, and they need to be referenced.

Sec. 3.2.2 – Source Delineation and Data Gap Sampling, pg. 3-3:

Soil data gap samples must be analyzed for more than the COCs identified in the watershed. The Water Board’s COCs list is insufficient to account for the soil contamination of the site.

Sec. 3.4 – Implementation, Restoration, and Effectiveness Monitoring, pg. 3-4:
If ISRA is to move forward first, please explain if there will be revisions to the proposed ENTS.

Sec. 4.1 – Existing Soil Analytical Data, pg. 4-1:
The evaluation is much too narrow since it only “identifies concentrations of the COCs that exceeded NPDES permit limits/benchmarks...” These are not the only pollution constituents of concern. There should enforceable NPDES permit limits rather than benchmarks.

Sec. 4.3 – Proposed Source Delineation and Data Gap Sampling, pg. 4-3:
This should include *all* the COCs.

Sec. 5.1 – Existing Soil Analytical Data, pg. 5-1:
Again, this should include *all* the COCs.

Sec 5.2 – Preliminary ISRA Evaluation Area, pgs. 5-4 - 5-6:
The Final Work Plan should be based on additional sample data collection to delineate areas exceeding background comparison levels for all COCs, not just those as currently defined by the Water Board. The Plan should include data and analysis of the ongoing background study being conducted by U.S. EPA and DTSC.

Where there are overlapping areas of elevated soils contaminant concentrations (PEA-B1-1, PEA-IEL-1, PEA-A1LF-1, PEA-A1LF-2, PEA-LOX-1, PEA-LOX-2, PEA-LOX-3, PEA-A2LF-1, PEA-A2LF-2, PEA-A2LF-3, PEA-AP/STP-1, PEA-ELV-1) as identified in the Group Reports, how will ISRA address how all elevated contaminant constituents should be evaluated and removed?

Sec. 5-3 – Proposed Source Delineation and Data Gap Sampling, pgs. 5-6 and 5-7:
All RCRA risk drivers and contributors should be the focus of sampling and delineation.

Sec. 6.0 – Summary and Schedule, pg. 6-1:
This Draft Work Plan only addresses exceedances of the NPDES permit limits and benchmarks. To implement source removal, it would be more comprehensive if all potential contaminants were considered, and again, since the Order was issued because of permit violations, enforceable limits rather than benchmarks are the proper methods of compliance measurement. This site is one of the most contaminated in Ventura County and the only site in the country to have had such a large release of radioactive material from a partial core meltdown. To protect the workers who will be working on this source removal project, to protect the nearby residents who may be affected by aerial drift from excavation and transportation and by surface water runoff, to protect anyone along a transportation route for the disposal of contaminated material, and to protect anyone working at or living near the final waste disposal site, all soil and surface water contaminants must be accounted for and properly addressed.



California Regional Water Quality Control Board

Los Angeles Region



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 20, 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

**COMMENTS ON PRELIMINARY INTERIM SOURCE REMOVAL ACTION WORK PLAN
SUBMITTED IN RESPONSE TO CALIFORNIA WATER CODE SECTION 13304 ORDER – THE
BOEING COMPANY, SANTA SUSANA FIELD LABORATORY, CANOGA PARK, CA (NPDES
NO. CA0001309, CI NO. 6027, SCP NO. 1111, SITE ID NO. 2040109)**

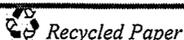
Dear Mr. Gallacher:

Los Angeles Regional Water Quality Control Board (Regional Board) staff have reviewed the February 2009 *Preliminary Interim Source Removal Action (ISRA) Work Plan Santa Susana Field Laboratory, Ventura County, California* (Work Plan). The Work Plan was submitted in response to “requirement 2” of the California Water Code section 13304 Order, dated December 3, 2008, (Order) issued to you by the Regional Board. “Requirement 2” states that you must “submit work plans to develop and select the appropriate treatment technologies to be used during source removal, including identification and delineation of the lateral and vertical extents of contamination in soil.”

In the Work Plan it is stated that “Requirement 2” will be complied with through implementation of the following tasks:

1. For outfalls 008 and 009, you will identify soil impacted areas within the watersheds contributing surface water flow to the outfalls and compile existing soil data representative of material that may provide a leachable or suspended source of contamination to surface water at the outfalls.
2. To prevent exceedances of permit limitations at outfall 008, you plan to identify potential source areas with elevated concentrations of the National Pollutant Discharge Elimination System permit chemicals of concern (COCs) which include copper, lead, and dioxins. For outfall 009, you plan to identify potential source areas with elevated concentrations of the COCs which include cadmium, copper, lead, mercury, and dioxins. The identified potential source areas are termed “Preliminary Interim Source Removal Action Preliminary Evaluation Areas” (ISRA PEAs), in the Work Plan.
3. The initial identifying criteria for ISRA PEAs will be exceedances of the Department of Toxic Substances Control (DTSC)-approved, 2005, soil background comparison concentrations in the upper 10 feet of soil. Soil background concentrations are under review by the DTSC, and may be modified in the future. If the data do not define the lateral and vertical extent of COCs potentially contributing to the permit exceedances, additional data will be collected. In areas of former operations where data for the COCs are not available, samples will be collected and data generated following existing, DTSC approved sampling and analyses methods.

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4. After potential surface water contamination source areas have been identified, the data set will be further reviewed to determine if other chemicals that are significant human and ecological health-risk drivers would potentially be mobilized during interim source removal. The technologies considered to address the target chemicals will minimize the possibility of mobilizing other chemicals that are significant health-risk drivers.
5. After soil data evaluation, additional soil data collection, and reevaluation of all relevant soil data you plan to prioritize individual ISRA PEAs according to the following criteria:
 - a. Magnitude of contamination concentrations relative to background conditions;
 - b. Estimated contaminant mass at individual ISRA PEAs;
 - c. Magnitude of exceedances relative to analytical laboratory result variability;
 - d. Specific ISRA PEA physical and chemical parameters contributing to site-specific contaminant transport;
 - e. Depth of COCs;
 - f. Proximity to drainages contributing to outfalls 008 and 009; and
 - g. Presence and type of surface cover.
6. Following ISRA PEAs identification, using the steps described above, they will be individually evaluated for appropriate remedial alternatives, and the alternatives ranked based on effectiveness, reliability, implementability, environmental impacts/sustainability, and cost. A standardized ranking system will be applied and an appropriate remedial alternative selected.
7. The results of these evaluations will be submitted to the Regional Board in compliance with "Requirement 3" of the Regional Board's California Water Code section 13304 Order, dated December 3, 2008, no later than May 1, 2009.

Several ISRA PEAs have been identified using existing data and the criteria described above. Three ISRA PEAs have been identified in the outfall 008 watershed and 12 in the outfall 009 watershed. Additional specific data gap sampling has not yet been identified for the ISRA PEAs of outfall 008, but is expected to focus on operational areas where the presence of the COCs has not been evaluated, and within the known ISRA PEAs. As with the outfall 008 watershed, additional specific data gap sampling for ISRA PEAs in the outfall 009 watershed is expected to focus on operational areas where the presence of the COCs has not been evaluated, and within the known ISRA PEAs.

The approach for selecting ISRA PEAs and evaluating and selecting remedial technologies for them, as presented in this Work Plan, is conditionally approved for use in preparing the Interim Source Removal Action Plan required in "Requirement 3" of the Regional Board's California Water Code section 13304 Order, dated December 3, 2008. However, you must comply with the following conditions:

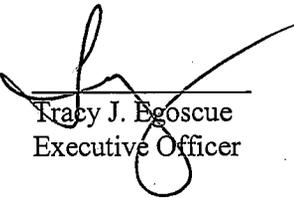
1. No later than **May 1, 2009**, you shall provide the Regional Board with a work plan identifying your approach to prevent contaminants in any soil excavated or otherwise disturbed as part of your compliance with the Order from being mobilized during wind or rain events. In addition to the COCs related to NPDES permit exceedances, the work plan must address all contaminants potentially in the soil. In lieu of submitting an individual work plan, you may present this work plan as part of the work plan required in "Requirement 2" of the Regional Board's California Water Code section 13304 Order, dated December 3, 2008.

2. The work plan required in item "1" above must include a discussion of how the responsible parties, Boeing and NASA, will coordinate responsibilities and cleanup of the watersheds related to outfalls 008 and 009.
3. All documents related to compliance with the December 3, 2008 Order must be posted on the internet concurrent with submittal to the Regional Board. In addition, all documents must include text indicating the location of the Boeing website where they can be accessed.

The Regional Board has received public comments pertinent to the ISRA Order and the tentative Waste Discharge Requirements, Cease and Desist Order, and Monitoring and Reporting Program. Regional Board staff will address the comments in the response to comments associated with the specific documents referenced.

Please telephone Mr. Peter Raftery at (213) 576-6724 or email him at praftery@waterboards.ca.gov if you have any questions.

Sincerely,



Tracy J. Egoscue
Executive Officer

cc: Mr. Gerard Abrams, Department of Toxic Substances Control, Sacramento
Mr. Peter Bailey, Department of Toxic Substances Control, Sacramento
Ms. Karen Baker, Department of Toxic Substances Control, Cypress
Mr. Stephen Baxter, Department of Toxic Substances Control, Glendale
Mr. David Beckman, NRDC
Assemblymember Bob Blumenfield, Assemblymember 40th District Assembly
Mr. Michael Bubman, Bell Creek Homeowners Association c/o
Ms. Jeannie Chari
Mr. Paul Costa, Boeing
Ms. Elizabeth Crawford
Mr. Jarrod Degonia, c/o Assemblymember Cameron Smyth
Ms. Gayle Demirtas, Simi Valley Library
Ms. Nicole Donner
Mr. John Farrow, M. R. Wolfe & Associates, P.C.
Dr. Mark Gold, Heal the Bay
Ms. Rondi Guthrie, c/o Assemblywoman Audra Strickland
Mr. Matt Hagemann, Soil/Water/Air Protection Enterprise
Ms. Carol Henderson, Office Manager, Bell Canyon Association
Mr. Dan Hirsch, Committee to Bridge the Gap (CBG)

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Ms. Teresa Jordan
Mr. Howard Kaplan and Mr. Arthur Pinchey, Brandeis-Bardin Institute
Mr. Thomas Kelly, Environmental Protection Agency, Region 9, (WTR-5)
Ms. Bonnie Klea
Mr. Dean Kunihiro, U.S. Nuclear Regulatory Commission
Mr. Wayne Lee
Mr. Michael Levy, State Water Resources Control Board, Office of Chief Counsel
Mr. Michael Lopez, U.S.D.O.E., Oakland
Dr. Joseph K. Lyou, Executive Director, Committee to Bridge the Gap (CBG)
Ms. Carissa Marsh, The Simi Valley Acorn
Ms. Marie Mason
Mr. Aron Millier, c/o Senator Fran Pavley
Mr. Jerry Murphy, Bell Creek Homeowners Association c/o
Assemblymember Pedro Nava, Assemblymember 35th District
Honorable Alex Padilla, Senator 20th District
Mr. Jim Pappas, Department of Toxic Substances Control, Sacramento
Ms. Linda Parks, Ventura County Board of Supervisors
Honorable Fran Pavley, Senator, 23rd District
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City of Los Angeles, Bureau of Engineering, Wastewater Systems Engineering Division
Department of Health Services, Public Water Supply Branch
Department of Interior, U.S. Fish and Wildlife Service
Environmental Protection Agency, Region 9, Office of Radiation Programs
Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
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
Masry & Vititoe Law Offices
NOAA, National Marine Fisheries Service
Simi Valley Library
The Boeing Company Santa Susana Field Laboratory
U.S. Army Corps of Engineers
ULARA Watermaster
Ventura County Air Pollution Control District
Ventura County Environmental Health Division
Ventura County Public Works
Water Replenishment District of Southern California

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 15th and 22nd, 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

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

Distribution:
Cassandra Owens, RWQCB
Allen Elliott, NASA
Dixie Hambrick, MWH

