



California Regional Water Quality Control Board

Los Angeles Region



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Arnold Schwarzenegger
Governor

July 7, 2009

Mr. Thomas D. Gallacher
Director, SSFL – Environment, Health & Safety
The Boeing Company
Santa Susana Field Laboratory
5800 Woolsey Canyon Road
Canoga Park, CA 91304-1148

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)

Dear Mr. Gallacher:

Los Angeles Regional Water Quality Control Board (Regional Board) staff has reviewed the June 19, 2009 document with the subject *Addendum to the Final Interim Source Removal Action (ISRA) Work Plan Submitted in Response to California Water Code Section 13304 Order* (Addendum). The Addendum, received by the Regional Board on June 22, 2009, was submitted in response to a Regional Board letter dated June 5, 2009 with the subject *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).

Regional Board staff conditionally approved the approach and commented on the February 2009 *Preliminary Interim Source Removal Action (ISRA) Workplan Santa Susana Field Laboratory, Ventura County, California* in a letter dated April 20, 2009. The Final Work Plan provides additional details for source removal in outfalls 008 and 009, and addresses the comments in the April 20, 2009 Regional Board letter.

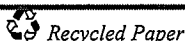
The Regional Board's June 5, 2009 letter required that Boeing respond to six comments no later than June 19, 2009. The six comments, a summary of Boeing's response, and the Board's response to Boeing's response are as follows:

- 1) The statement that NASA has funding constraints appears in several places in the document. Please clarify the significance of these constraints. Do they have the potential to significantly influence the project schedule?

Summary of Boeing's Response: No delays are expected.

Board staff comment: Boeing's response satisfactory.

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- 2) Based on Figure 3-1, the area with the highest copper and lead concentrations in soil in the outfall 008 area appears to have been excavated during the perchlorate cleanup. Please explain the need to re-excavate.

Summary of Boeing's Response: Prior excavation focused on perchlorate, the elevated metals remained in the sidewalls of that excavation

Board staff comment: Boeing response satisfactory.

- 3) It is indicated in Appendix B that rainfall runoff carries approximately 1000 tons of soil through outfall 008 each year. Based on field evidence, verify the reasonableness of this estimate.

Summary of Boeing's Response: The 1000 tons represents the calculation of soil that is potentially eroded within the watershed. A significant amount of this material is redeposited within the watershed and does not leave through Outfall 008. The soil discharged through Outfall 008, based on measured Total Suspended Solids, is 5.2 tons per year. However, this lower value does not include bedload transport through Outfall 008, which will increase the total mass transported through Outfall 008.

Board staff comment: Boeing response satisfactory.

- 4) Section 5-5, "Confirmation Soil Sampling" indicates that samples will be collected at "varying depths." Staff understands that samples will be collected at a range of depths below the surface of the excavation. Please clarify the proposed sampling depths in the Final Work Plan.

Summary of Boeing's Response: Depths refers to depths below the surface, rather than depths into the sidewall. Boeing will refer to this as elevations within the sidewall in future documents.

Board staff comment: Boeing response satisfactory.

- 5) The sequence of source cleanups in the watersheds for outfalls 008 and 009, are not clear in the Final Work Plan. The schedule of the NASA work in the eastern 009 area is not well integrated into the overall schedule discussion. The Final Work Plan shall include a combined schedule with both NASA and non-NASA work and also include a chart that indicates the organizational responsibilities for each area cleanup task.

Summary of Boeing's Response: For 2009, source removal is planned at seven locations in the Outfall 008 watershed on Boeing property and two locations in the Outfall 009 watershed on NASA property. Data gap sampling is currently being performed at other preliminary evaluation areas (PEAs) in the Outfall 009 watershed on Boeing and NASA property; this is expected to be finished during 2010. Remedial alternative evaluations for the other PEAs will be performed using this new data. Remedial actions will be planned for 2010 and 2011. A responsibility matrix with details of ISRA activities is included.

Board staff comment: Boeing response satisfactory.

- 6) The Final Work Plan does not adequately describe radiological monitoring during cleanup. Monitoring for radiological contamination is an important activity being conducted during soil excavation. The details of radiological screening must be clearly presented in the Final Work Plan.

Summary of Boeing's Response: Radiological screening is proposed to be conducted on excavated soils planned for offsite disposal, and that the procedure will be similar to those established for ongoing activities in the Northern Drainage. Radiological screening protocols will be included in the Soil Management Plan, which will be submitted to the Regional Board prior to implementation. However, based on the results of historical sampling and analysis of soil, surface water, and groundwater in these watersheds, other radiological monitoring is not planned. If subsurface debris is encountered during ISRA implementation, additional radiological screening measures will be performed. These screening measures will be consistent with the Department of Toxic Substances Control approved procedures for cleanup of the Northern Drainage, and as required in the Area I and II Landfills investigation work plan.

Board staff comment: Boeing response satisfactory. However, Regional Board staff looks forward to receipt of the Soil Management Plan with a complete description of the radiological monitoring plan.

Based upon the aforesaid, the Final Interim Source Removal Action Work Plan is hereby approved, subject to the following:

Health & Safety Plan: All work shall be performed in accordance with a Health and Safety Plan, as specified in section 6.1 of the ISRA Work Plan.

Erosion Control Plan: All work shall be performed in accordance with a site-specific Storm Water Pollution Prevention Plan (SWPPP), as specified in section 6.2 of the ISRA Work Plan, which shall include appropriate best management practices (BMPs) for erosion control.

Soil Management Plan: All work shall be performed in accordance with a Soil Management Plan that will provide procedures for characterization, handling, storage, disposal and documentation of soil generated during construction activities, as specified in section 6.3 of the ISRA Work Plan.

Transportation Plan: All work shall be performed in accordance with a Transportation Plan which defines procedures for transporting personnel, equipment and materials to facilitate safe and efficient traffic flow within the facility and on public roadways, as specified in section 6.4 of the ISRA Work Plan.

Biological and Archeological Surveys: Biological and archeological surveys shall be performed prior to and/or during the implementation of remedial actions, as specified in section 6.5 of the ISRA Work Plan. Environmentally sensitive areas (ESAs) shall be identified before the performance of any work, and a qualified biological or archeological monitor shall be on site during the performance of any work that could disturb any ESAs.

Mr. Thomas D. Gallacher
The Boeing Company

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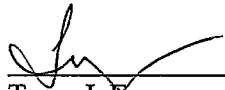
Streambed Alteration Agreement: All work shall adhere to the requirements of Streambed Alteration Agreement No. 1600-2003-5052-R5 (September 11, 2007), as amended, with the California Department of Fish and Game, as specified in section 6.5 of the ISRA Work Plan.

Clean Water Act (CWA) Section 404 permit and Section 401 certification: All work shall adhere to the requirements CWA Nationwide Permit 38 from the U.S. Army Corps of Engineers and CWA Section 401 water quality certification from the Regional Board, as specified in section 6.5 of the ISRA Work Plan.

In addition, the discharger shall coordinate the timing, design, construction, and implementation of any BMPs or ENTS with Board staff as part of Project implementation. Board staff shall address any BMPs or ENTS, whether proposed by the discharger or required by the Board, comprehensively as part of the ISRA.

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: Honorable Alex Padilla, Senator 20th District
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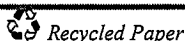
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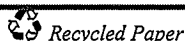


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Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
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Los Angeles and San Gabriel Rivers Watershed Council
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