



California Regional Water Quality Control Board Los Angeles Region



Linda S. Adams
Agency Secretary

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Arnold Schwarzenegger
Governor

June 10, 2009

Mr. Thomas D. Gallacher, Director
SSFL – Safety, Health & Environmental Affairs
The Boeing Company
Santa Susana Field Laboratory
5800 Woolsey Canyon Road

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL COMMENTS ON THE FINAL INTERIM
SOURCE REMOVAL ACTION WORK PLAN SUBMITTED IN RESPONSE TO CALIFORNIA
WATER CODE SECTION 13204 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:

The Los Angeles Regional Water Quality Control Board (Regional Board) received comments from the
Department of Toxic Substances Control regarding the May 2009 Final Interim Source Removal Action

Mr. Thomas D. Gallacher
The Boeing Company

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cc: Honorable Alex Padilla, Senator 20th District
Honorable Fran Pavley, Senator, 23rd District
Honorable Tony Strickland, Senator 19th District

Mr. Thomas D. Gallacher
The Boeing Company

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cc list continued

Dr. Jae Kim, Tetra Tech

Ms. Bonnie Klea
Mr. Wayne Lee

cc list continued

Ms. Elizabeth Zlotnik
California Coastal Commission, South Coast District
California State University, Northridge
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



Mr. [REDACTED]

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The Work Plan does not indicate that soil confirmation sampling consistent with EPA

Ms. [REDACTED]

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Ms. Merrilee Fellows
NASA Manager for Community Involvement
for Environmental Remediation
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Pasadena, CA 91109

Mr. Thomas Johnson
Deputy Federal Project Director
US Department of Energy
5800 Woolsev Canvon Road

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Santa Susana Field Laboratory Project Team
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Mr. Gerard Abrams, C.H.G.
Senior Engineering Geologist
Department of Toxic Substances Control
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Mr. Thomas Seckington, C.H.G.
Senior Engineering Geologist
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Mr. Dave Shook, D.C.

Senior Engineering Geologist
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Ms. Susan Callery
Public Participation Specialist
Department of Toxic Substances Control



Department of Toxic Substances Control



Linda S. Adams

Maureen F. Gorsen, Director
700 Heinz Avenue



Arnold Schwarzenegger

To: Gerard Abrams, C.HG.
Senior Engineering Geologist
Northern California Permitting and Corrective Action Branch
Hazardous Waste Management Program

From: Buck King, C.HG. *Buck King*
Senior Engineering Geologist
Geologic Services Branch

Date: June 4, 2009

Re: Final Interim Source Removal Action Work Plan

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ISRA work planning documents. The ISRA Work Plan should indicate that excavated soil identified for disposal will be screened for radionuclides.

3. Removal of source soil materials from 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 soil removal action.

The ISRA Work Plan is responsive to Concern 1 and indicates (page 5-1) that the plan uses the 2005 background comparison concentrations in evaluation of soil excavation

ISRA soil source areas will be reviewed and ISRA area recommendations will be amended as warranted.

The ISRA Work Plan is partially responsive to Concern 2 and includes a brief reference

2. The Chemicals of Concern (COCs) used to define preliminary excavation areas (PEAs) in Outfall 009 watershed include volatile organic compound (VOC) trichloroethene (TCE). Soil confirmation sampling description (page 5-4) should include clear reference to use of sampling method EPA Method 5035 for analysis of VOCs in soil.
3. The description of soil stock pile air emissions evaluation using a photo ionization detector (PID) is incomplete (page 6-2). The SMD should include at a minimum