

INTERIM SOURCE REMOVAL
PHASE I IMPLEMENTATION PLAN
SANTA SUSANA FIELD LANDFILL
VENTURA COUNTY, CALIFORNIA

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Prepared For:

The Boeing Company

and

The National Aeronautics and Space Administration

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ABBREVIATIONS AND ACRONYMS (Continued)

SWRCB	California State Water Resources Control Board
TPH	total petroleum hydrocarbons
USEPA	United States Environmental Protection Agency
USACE	United States Army Corp of Engineers
UXO	unexploded ordinance
VOC	volatile organic compound
W and S	W and S Consultants
WDR	Waste Discharge Requirement

1.0 INTRODUCTION

This Interim Source Removal Action (ISRA) Phase I Implementation Report summarizes the ISRA activities performed during 2009 at the Santa Susana Field Laboratory (SSFL). ISRA implementation activities were conducted by MWH and CH2M Hill on behalf of The Boeing Company (Boeing) and the National Aeronautics and Space Administration (NASA) pursuant to a California Water Code Section 13304 Cleanup and Abatement Order (CAO) issued by the Los Angeles Regional Water Quality Control Board (RWQCB) dated December 3, 2008 (RWQCB, 2008). The CAO was issued by the RWQCB to achieve compliance with the Waste Discharge Requirements (WDRs) for Outfalls

the NPDES permit limits/benchmarks were established, the ISRA COCs for surface water are copper, lead, and dioxins at Outfall 008, and cadmium, copper, lead, mercury, and dioxins, pH, and oil and grease at Outfall 009. Since the exceedances of oil and grease and pH at Outfall 009 each occurred only once and are attributable to natural causes (Boeing, 2005b and 2006), they are not considered ISRA COCs as described

future implementation, and addenda to the Final ISRA Work Plan will be prepared to describe these activities and present the remediation strategy selected for each.

Within the three Outfall 008 PEAs, seven ISRA areas were identified (Figure 1-4), via data gap and delineation soil sampling, PEA refinement, and evaluation according to the criteria described in Section 1.1.2., as presented in the Final ISRA Work Plan (MWH, 2009c). These ISRA areas are located within the Happy Valley South (HVS) RFI Site, the Canyon RFI Site, and in the drainage downgradient from the Canyon RFI Site. A remedial alternatives analysis in the Final ISRA Work Plan (MWH, 2009c) identified excavation and offsite disposal as the optimal remediation strategy for each of these ISRA areas, and SRGs were developed as cleanup goals for confirmation sampling. Subsequently, additional delineation soil sampling within the Outfall 008 watershed was performed in areas where excavation boundaries were farther than approximately 25 feet from the locations of SRG exceedances, and the seven ISRA areas were further refined and subdivided into ten final ISRA areas in 2009 (CYN-1, DRG-1, HVS-1, HVS-2A, HVS-2B-1, HVS-2B-2, HVS-2C, HVS-2D, HVS-3, and HVS-4).

The two Outfall 009 ISRA PEAs selected for Phase I activities, PEA-A2LF-1 and PEA-A2LF-3, were refined via data gap and delineation soil sampling (Figure 1-5). Sampling results and the resulting two final ISRA Areas, A2LF-1 and A2LF-3, were presented in an Addendum to the Final ISRA Work Plan submitted to the RWQCB (NASA, 2009), along with SRGs developed as cleanup goals for confirmation sampling for each ISRA area. ISRA Area A2LF-1 is located on the northeast bank of the Northern Drainage immediately upgradient from the Outfall 009 location, and ISRA Area A2LF-3 is located adjacent to and within a road culvert southeast of the ELV RFI Site. Excavation and offsite disposal was identified as the optimal remediation strategy for each of these ISRA areas.

Soil sample locations, boring logs, and the final planned excavation boundaries for these 12 Phase I ISRA areas are included in appendices to this report (see Section 1.2). SRGs for each ISRA area are listed on figures and tables in appendices to this report.

Following the identification of the ISRA areas for Phase I activities,

- Monthly and quarterly ISRA progress reports were submitted to the RWQCB describing ISRA activities since December 2008 (Boeing, 2009e, 2009i, 2009j, 2009k, 2009o-u).
- ISRA work plans and supplemental plans were submitted to the RWQCB and DTSC for review and comments, and comments were addressed in work plan addenda.
- Draft versions of the ISRA work plans and the ISRA Performance Monitoring Plan were submitted to the Surface Water Expert Panel for review and comments, and comments were addressed prior to finalization.
- The Surface Water Expert Panel developed Containerized Planting Plans for areas within Outfall 008 as part of site restoration.
- During Phase I ISRA implementation (July – December 2009), the RWQCB conducted 25 site visits; DTSC conducted 5 site visits; and Ventura County conducted 6 site visits.
- The RWQCB collected and analyzed 27 split samples of excavation confirmation soil samples at Outfall 008 and Outfall 009 ISRA areas. The RWQCB also collected 5 split samples of the confirmation samples collected after removal of the septic tank, soil collapse feature, and abandoned metal pipeline.
- Excavation confirmation soil sampling results for each ISRA area were provided to the RWQCB and DTSC for review, results were discussed on teleconferences, and approval that SRGs had been achieved was received from the RWQCB prior to excavation backfill and restoration of each ISRA area.
- Boeing, NASA, and the Surface Water Expert Panel gave a presentation on ISRA Phase I progress at the RWQCB public meeting on December 10, 2009.

Public participation during Phase I ISRA activities included public review and comment periods on the Preliminary ISRA Work Plan (MWH, 2009b) and the Final ISRA Work Plan (MWH, 2009c); and three site visits by members of the public between September and December 2009. ISRA documents including work plans, supplemental plans, soil waste characterizations, monthly progress reports, quarterly progress reports, and letter communications with regulatory agencies were made available to the public on th9725CB tion sa

- Section 2 describes the preparation activities that were undertaken prior to Phase I ISRA implementation, including work plan preparation, supplemental plan preparation, permitting, waste characterization sampling, Outfall 008 soil borrow area sampling, and site surveys and site preparation activities.
- Section 3 presents the results of the Phase I ISRA implementation activities, including excavations, Storm Water Pollution Prevention Plan (SWPPP) implementation, and site restoration. It also describes the plan that has been approved and implemented for storm water performance monitoring during the 2009-2010 and 2010-2011 rainy seasons.
- Section 4 presents a summary of the work performed and ongoing.
- Appendix A provides copies of correspondence regarding Phase I ISRA implementation activities.
- Appendix B provides waste certification documents for excavated soils.
- Appendix C presents topographic surveys of Phase I ISRA implementation areas.
- Appendix D provides boring logs for soil samples and trench logs for excavations conducted during Phase I ISRA implementation activities.
- Appendix E presents maps and tables showing pre-excavation and post-excavation soil sampling results and excavation boundaries for Phase I ISRA implementation activities.
- Appendix F provides offsite disposal records for excavated soils that were transported offsite in 2009.
- Appendix G provides laboratory and data validation reports for soil and surface water samples collected during Phase I implementation.
- Appendix H provides documents and correspondence related to the removal of the septic tank within ISRA Area HVS-3 during Phase I implementation activities.
- Appendix I provides photographs of ISRA Phase I activities.
- Appendix J lists the results of surface water samples collected per the ISRA SWPPP.
- Appendix K provides design diagrams for culvert installations performed during 2009 as part of surface water maintenance activities within the Outfall 009 watershed.

2.0 PREPARATION ACTIVITIES

This section describes the preparation ac

(RWQCB, 2009a). These letters are included in Appendix A. The comments and conditional approval requirements presented in these letters were incorporated into the Final ISRA Work Plan. After reviewing the RWQCB conditional approval letter, Boeing submitted a letter to the RWQCB dated April 30, 2009 clarifying a few items from the RWQCB comment letter (Boeing, 2009a). This letter is also included in Appendix A.

2.1.2 Final ISRA Work Plan

The Final ISRA Work Plan was submitted to the RWQCB on May 1, 2009 (MWH, 2009c). The Final ISRA Work Plan supplemented the Preliminary ISRA Work Plan by completing the ISRA Area identification and remedial planning process for the Outfall 008 watershed and one portion of the Outfall 009 watershed near the ELV RFI Site. The Final ISRA Work Plan also described remedial action implementation methods for four preferred remedial action alternatives, site preparation activities, confirmation soil and ISRA performance sampling requirements and procedures, and site restoration activities; and summarized additional remedial action planning activities to be performed for ISRA implementation.

The DTSC submitted comments on the Final ISRA Work Plan to the RWQCB in June 2009 (DTSC, 2009b). The RWQCB submitted letters to Boeing dated June 5 and 10, 2009 containing these and additional comments on the Final ISRA Work Plan (RWQCB, 2009c, 2009d). In response, Boeing submitted an Addendum to the Final ISRA Work Plan to RWQCB on June 19, 2009 (MWH, 2009g). RWQCB indicated its approval of the Final ISRA Work Plan and the Addendum to the Final ISRA Work Plan in a letter to Boeing dated July 7, 2009 (RWQCB, 2009f). These letters are included in Appendix A.

2.1.3 Final Work Plan Amendments

Three amendments to the Final ISRA Work Plan were prepared: a letter Addendum to the Final ISRA Work Plan (MWH, 2009g); a Work Plan Letter Amendment, HVS-2A Soil Collapse Feature and Pipeline Summary and Plan (MWH, 2009p); and a Work Plan Addendum for Additional Work in the Outfall 009 Watershed (NASA, 2009). A summary of the contents of each is provided below. Additionally, a work plan for removal of the septic tank discovered at Happy Valley South (MWH, 2009r) was submitted to the RWQCB on October 9, 2009, and is included in Appendix H.

2.1.3.1 Response to Agency Comments

An Addendum to the Final ISRA Work Plan was submitted to the RWQCB on June 19, 2009 (MWH, 2009g), to respond to RWQCB and DTSC comments on the Final ISRA Work Plan. This Addendum is included in Appendix A.

2.1.3.2 HVS-2A Soil Collapse Feature and Pipeline Summary and Plan

The HVS-2A Soil Collapse Feature and Pipeline Removal Summary and Plan, Letter Amendment to the Final ISRA Work Plan, was submitted to the RWQCB on September 18, 2009 (MWH, 2009p). This document was prepared when a portion of a buried abandoned metal pipeline and a soil collapse area were identified adjacent to Outfall 008 ISRA Area HVS-2A at the beginning of Phase I remedial activities. The Letter Amendment summarized historical information, the results of a geophysical survey and trench investigations confirming the locations of the terminations of the pipeline segment, and results of samples of the pipeline wrapping and collapse feature soils. The Letter Amendment also presented a plan for the removal of the pipeline segment, the management and disposal of soils excavated to a depth of 5m. The 6 T

November 4, 2009 approving the additional work at A2LF-1 and A2LF-3 (RWQCB, 2009n).
These correspondences are included in Appendix A.

2.2 SUPPLEMENTAL PLANS

- Performance Monitoring Plan, (MWH, 2010), which describes the sampling and analysis plan for performance monitoring at ISRA areas; RWQCB approved this plan in a letter dated February 3, 2010 (RWQCB, 2010).

2.3 PERMITTING

Permitting activities were conducted after submittal of the Final Work Plan, as required by Item 7 of the CAO. All necessary permits were obtained prior to beginning remediation activities and included the following:

- Clean Water Act (CWA) Section 404, Nationwide Permit (NWP) 38 (Cleanup of Hazardous and Toxic Waste), from the U.S. Army Corps of Engineers (USACE), for

to characterize soil removed from the ISRA excavations as either nonhazardous or hazardous waste for disposal purposes, as described in the ISRA SMP (MWH, 2009h). To facilitate this, *in situ* waste characterization soil samples were collected from Phase I ISRA areas after the excavation boundaries were finalized and prior to beginning remedial activities. The number of waste characterization samples required for each ISRA area was determined based on the planned excavation volume. *In situ* waste characterization samples were collected from random locations within each ISRA area, with sample locations determined by randomly-generated coordinates within the ISRA area boundary. In two cases, additional *ex situ* waste characterization samples were collected from stockpiles after excavation was conducted. Sample locations and results for waste characterization samples are shown in Appendix E. Boring logs for waste characterization samples are included in Appendix D.

Waste characterization samples were analyzed for the full suite of metals and collocated RCRA risk drivers. Dioxins were not analyzed because the level of dioxins in soil was not expected to exceed hazardous waste criteria based on the results of samples within each ISRA area. In addition, all waste characterization samples were analyzed for the radiological constituents listed below. The radionuclide sampling and analysis protocol for waste characterization sampling was the same as that used for the Northern Drainage cleanup action approved by DTSC. Laboratory requirements for radionuclide analysis were presented in the ISRA SMP (MWH, 2009h), as indicated below:

- Gamma-emitting radionuclides by USEPA Method 901.1;
- Strontium-90 by USEPA Method 905.0; and
- Tritium by USEPA Method 906.0.

The results of waste characterization samples were used to develop chemical and radiological waste certifications prepared by Boeing. Chemical waste certifications classified waste soils

outcome of radiological analyses of waste soils from each ISRA area are listed in Section 3 tables.

2.5 OUTFALL 008 SOIL BORROW AREA SAMPLING

A local soil borrow source was used for fill during recontouring of excavations in Outfall 008. The soil borrow area was located within the Outfall 008 watershed adjacent to ISRA Area HVS-2A, but in an area that has not been impacted by operational activities. Prior to use, samples were collected from the soil borrow area and analyzed for the following ISRA COCs and other site-related chemicals of potential concern:

- Metals by USEPA Method 6010B/6020/7471A;
- Dioxins by USEPA Method 1613B;
- Polychlorinated biphenyls (PCBs) by USEPA Method 8082;
- Semi-volatile organic compounds (SVOCs) by USEPA Method 8270C SIM;
- Perchlorate by USEPA Methods 314.0 DI-WET and 6850; and
- Total Petroleum Hydrocarbons (TPH) by USEPA Method SW8015BM.

Soil borrow area sample results did not exceed the SRGs for ISRA COCs. Soil borrow area sampling results were provided to the RWQCB and DTSC for review and approved for use as backfill within the Outfall 008 ISRA area excavations prior to beginning restoration activities. Soil borrow area sample results are discussed in Section 3 and shown with other ISRA Phase I sample results in Appendix E figures and tables. Boring logs for soil borrow area samples are included in Appendix D.

2.6 SITE SURVEYS AND SITE PREPARATION ACTIVITIES

The following site surveys and site preparation activities were conducted prior to the Phase I ISRA implementation:

- Biological surveys of planned Phase I ISRA areas, conducted by Padre, Inc., (Padre, 2009a-c). The biological surveys were performed to identify the presence of sensitive species and to help prepare potential relocation and/or mitigation options, and to ensure compliance with the CDFG SAA.
- Archaeological assessment of planned Phase I ISRA areas within Outfall 008, conducted by W and S Consultants (W and S, 2009). The archeological assessment was performed to identify the potential for adverse impacts to cultural resources. Results of the

3.0 PHASE I REMEDIAL ACTION IMPLEMENTATION SUMMARY

During Phase I implementation, remedial actions were conducted at the ten ISRA areas within the Outfall 008 watershed and the two ISRA areas within the Outfall 009 watershed on NASA property. The recommended remedial alternative identified for each of the Outfall 008 and 009 ISRA areas was excavation and offsite disposal,

Appendix E figures, and confirmation sample results are listed in Appendix E tables. Confirmation soil samples were also collected from the HVS-2A pipeline removal trench; these are also shown in Appendix E Figure E-5.2. Soil associated with confirmation samples with results exceeding SRGs, such as at HVS-3 and HVS-2B-1, was subsequently removed. The remediation status of confirmation samples with results above SRGs are, therefore, listed as “Excavated” in Appendix E tables. If the additional excavation did not contact bedrock, additional confirmation samples were collected.

Soil management was conducted as specified in the ISRA Transportation Plan (MWH, 2009d) and the ISRA SMP (MWH, 2009h). Excavated soil was loaded directly into haul trucks and transported to a temporary stockpile location at the Lower Parking Lot near the SSFL facilities entrance. Soil excavated from HVS-2B-1 on September 14, 2009 and soil excavated from the HVS-2A pipeline trench, HVS-2D, and HVS-3 on October 19, 2009 were temporarily stored in stockpiles and *ex situ* stockpile samples were collected for waste characterization purposes. All waste soils from Outfall 008 were classified as nonhazardous and were transported to Antelope Valley Recycle and Disposal Facility in Palmdale, California, for disposal. Offsite disposal of Outfall 008 waste soils was completed on November 30, 2009. Offsite disposal records, including a summary of offsite disposal records and waste manifests, are provided in Appendix F.

Confirmation sample location maps and results tables for each ISRA area were provided to

shipment in 2010. Waste soils from A2LF-1 were classified as nonhazardous, and soils from A2LF-3 were classified as hazardous for lead.

Confirmation sample location maps and results tables for each ISRA area were provided to RWQCB for review and approval prior to backfill and site restoration. Following review of the confirmation sampling data, RWQCB concurred that excavation was complete at each ISRA area and restoration activities could proceed. Results for ISRA COCs in samples remaining in place are shown in Figure 3-2.

3.3 SWPPP IMPLEMENTATION

Erosion control BMPs were installed at the Outfall 008 ISRA areas between August 10 and 13, 2009, and at the Outfall 009 ISRA areas on September 25, 2009, prior to the start of remediation activities, per the ISRA SWPPP. Weekly BMP inspections have been conducted during the rainy season per the ISRA SWPPP, beginning on October 14, 2009. BMP conditions have been documented during inspections, and BMP repairs and maintenance have been performed on an ongoing basis.

Two rain events occurred during Phase I excavation activities, including a rain event between October 13 and 14, 2009, during excavation activities at Outfall 008, and between December 7 and 12, 2009, prior to the completion of site restoration at A2LF-3, but after the completion of site restoration at all other ISRA areas. In anticipation of and prior to these rain events, all in-progress ISRA area excavations were covered with plastic tarps to control soil migration. During the October 2009 rain event, SWPPP samples were collected downgradient of Outfall 008 ISRA Areas HVS-2B-2 and HVS-2C. During the December 2009 rain event, SWPPP samples were collected downgradient of Outfall 009 ISRA Area A2LF-3. The sample locations and results for the Outfall 008 SWPPP samples are provided in Appendix J figures and tables. Following these rain events, BMPs were repaired or replaced as necessary.

3.4 SITE RESTORATION

Restoration of each Phase I ISRA area was performed after RWQCB concurred that the excavation was complete, based on a comparison of confirmation sample results to SRGs. Site

restoration consisted of excavation backfill, excavation recontouring, installation of natural BMPs, and/or installation of erosion control BMPs, as described below.

3.4.1 Outfall 008 ISRA Areas

Site restoration at the ten Outfall 008 ISRA areas began on November 20, 2009, and was completed on December 4, 2009. Excavations were backfilled using soil from the soil borrow area adjacent to HVS-2A, as described in Section 2.5, and/or adjacent soils were recontoured. Restored excavations approximately matched the previously existing topographic grade and sloped to ensure there were no areas where water might pond. Erosion control BMPs including fiber rolls, hay bales, silt fences, and hydroseed mulch were installed on and near the restored excavations.

In addition, a plan to install natural erosion control BMPs in the Outfall 008 watershed was developed by the Surface Water Expert Panel, as described in Section 2.2 above (Josselyn, 2009). The natural BMPs consist of plants and plant materials that originally were being grown for use in Engineered Natural Treatment Systems (ENTS) that were planned prior to the issuance of the CAO directing the performance of ISRA activities in the Outfall 008 watershed program. To prevent soil erosion in the Outfall 008 watershed, containerized plants were planted in several topographic lows within and adjacent to the drainages from the HVS RFI Site and the Canyon RFI Site, and near the ISRA areas; and mulefat wattles were constructed and placed at several points within the drainage from HVS RFI Site. The natural BMPs were installed on November 4 and 5, 2009. The natural BMP installation locations are shown in Figure 3-3.

A post-restoration aerial topographic survey of the Outfall 008 watershed was conducted by Sage Consultants, Inc., on December 18, 2009, after Outfall 008 excavation backfill and recontouring activities were completed. Post-restoration topographic survey drawings are included in Appendix C-3.

3.4.2 Outfall 009 ISRA Areas

Site restoration at the two Outfall 009 ISRA areas began on November 24, 2009, and was completed on January 15, 2010. Site restoration at A2LF-1 consisted of recontouring adjacent soils and installation of erosion control BMPs (fiber rolls and hydroseed mulch). Site restoration

at A2LF-3 consisted of recontouring adjacent soils and installing a new culvert headwall, followed by erosion control BMPs (rip-rap, fiber rolls, plastic tarp, sandbags, and hydroseed mulch). Restored excavations approximately matched the previously existing topographic grade and sloped to ensure there were no areas where water might pond. A post-restoration aerial topographic survey was not conducted for Outfall 009 Phase I ISRA areas since these excavations were relatively small.

As part of the SSFL surface water maintenance program, culvert upgrades were also performed at 12 culverts within the Outfall 009 watershed in early 2009. These culvert maintenance actions included installation of culvert headwalls and filtration media to reduce sediment loads in storm water discharging into the primary Outfall 009 drainage. The design of the culvert maintenance

with the RWQCB and DTSC on an ongoing basis as data are received, and will be presented in the first ISRA quarterly progress report after the end of the 2009/2010 rainy season. Similarly, performance monitoring sampling results from the 2010/2011 rainy season will be reviewed with the RWQCB and DTSC on an ongoing basis as data are received, and will be presented in the first ISRA quarterly progress report after the end of the 2010/2011 rainy season.

4.0 SUMMARY AND ONGOING WORK

Phase I ISRA remedial activities during 2009 consisted of excavation and site restoration at ten ISRA areas in the Outfall 008 watershed on Bo

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