



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Cal/EPA 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

December 3, 2008

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

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:

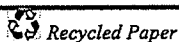
The California Regional Water Quality Control Board, Los Angeles Region (Regional Board), is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura County, including the above-referenced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

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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.

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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

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Mr. Thomas D. Gallacher  
The Boeing Company

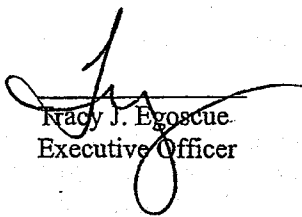
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23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the 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](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

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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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**Mailing List (continued)**

Mr. Wayne Lee  
Simi Valley Library  
California State University, Northridge  
Mr. Evan Rose, L.A.U.S.D.  
Mr. Cybil Zeppieri  
Mr. Lori Zinkan  
Ms. Christina Walsh  
Ms. Teresa Jordan  
Ms. Mary Wisebrock  
Masry & Vititoe Law Offices  
Mr. Jonathan Parfrey, Executive Director, Physicians for Social Responsibility  
Mr. Matt Hagemann, Soil/Water/Air Protection Enterprise  
Ms. Bonnie Klea  
Ms. Laura Plotkin, c/o Senator Sheila Kuehl  
Mr. John Farrow, M. R. Wolfe & Associates, P.C.  
Mr. Anthony Zepeda  
Ms. Lorraine Scott  
Florence and Dorri Raskin  
Ms. Kirsten James, MESM, Staff Scientist, Heal the Bay  
Ms. Elizabeth Crawford, Senior Environmental Specialist, Physicians for Social Responsibility  
Paul Costa, Boeing  
Ms. Sharon Rubalcava, Weston, Benshoof, Rochefort, Rubalcava, MacCuish, LLP  
Ms. Darlene Ruiz, Hunter Ruiz Research, Consulting and Advocacy  
Mr. Jack M. Wallace  
Mr. Jae Kim, TetraTech

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