



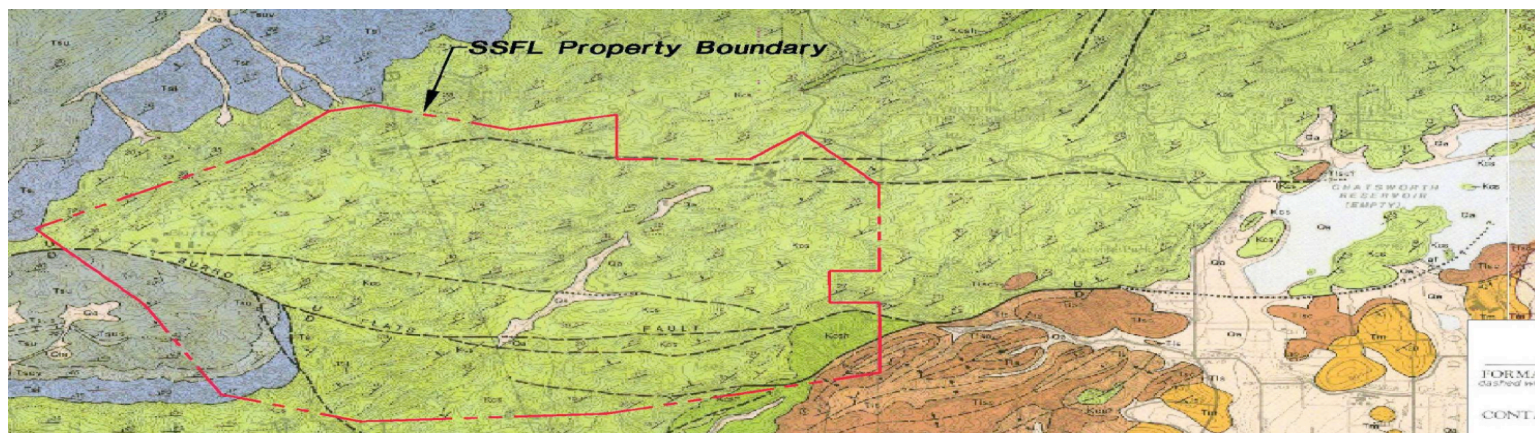
Tracy J. Egoscue – Executive Officer

11/2/2009

California Regional Water Quality Control Board, Los Angeles Region (Regional Board)
320 West 4th Street, Suite 200, Los Angeles, California 90013 (Via U.S. Mail and E-mail)

**NO FURTHER ACTION FOR RADIOACTIVITY IN GROUNDWATER PURSUANT TO CALIFORNIA WATER CODE
SECTION 13267 ORDER – RAYTHEON COMPANY (FORMER HUGHES MISSILE SYSTEMS COMPANY)
8433 FALLBROOK AVENUE, CANOGA PARK, CALIFORNIA 91304**

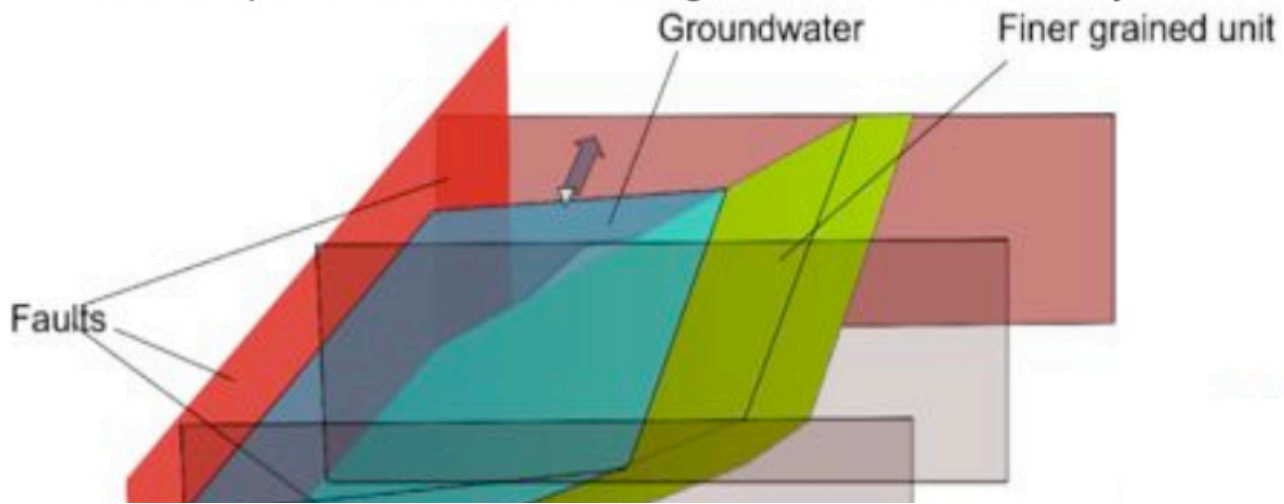
ACME (Aerospace Cancer Museum of Education) has provided the below comments on the No Further Action (NFA) decision for Radioactivity in Groundwater at the Corporate Pointe at West Hills (CPWH) 8433 Fallbrook Avenue site. According to your letter “based on the information obtained from the USEPA website <http://www.epa.gov/radiation/radionuclides/index.html> uranium and radium occur naturally in the environment.” Let it be known that the Santa Susana Field Laboratory (SSFL) sits on the Burro Flats fault that starts in the Nuclear Operational AREA IV (Decades of Uranium usage) of the SSFL and runs through the lower portion of the site ending up in the Chatsworth Reservoir that is adjacent to CPWH. These faults act as a pipeline of contamination from the SSFL to the communities below the site, including CPWH. In November of 2008 the Department of Toxic Substances Control (DTSC) found Radium in the AREA I Burn Pit of the SSFL <http://www.h2ohno.com/burnpit.html> The report states “The radiation levels, found at nine localized areas and measuring several inches to one foot in diameter, ranged from 20 to 115 microrems per hour. Natural background level is 12 microrems per hour” considerably higher than what is found in nature. Every rain event will provide movement potential of this soil into the groundwater, as the AREA I Burn Pit watershed could contribute by fault pathways. The CPWH property is shown above the box in the lower right of this Thomas Dibblee Geology Map.



This Figure is from Page 19 of the February 8, 2007 Report "Santa Susana Field Laboratory Groundwater Investigation."

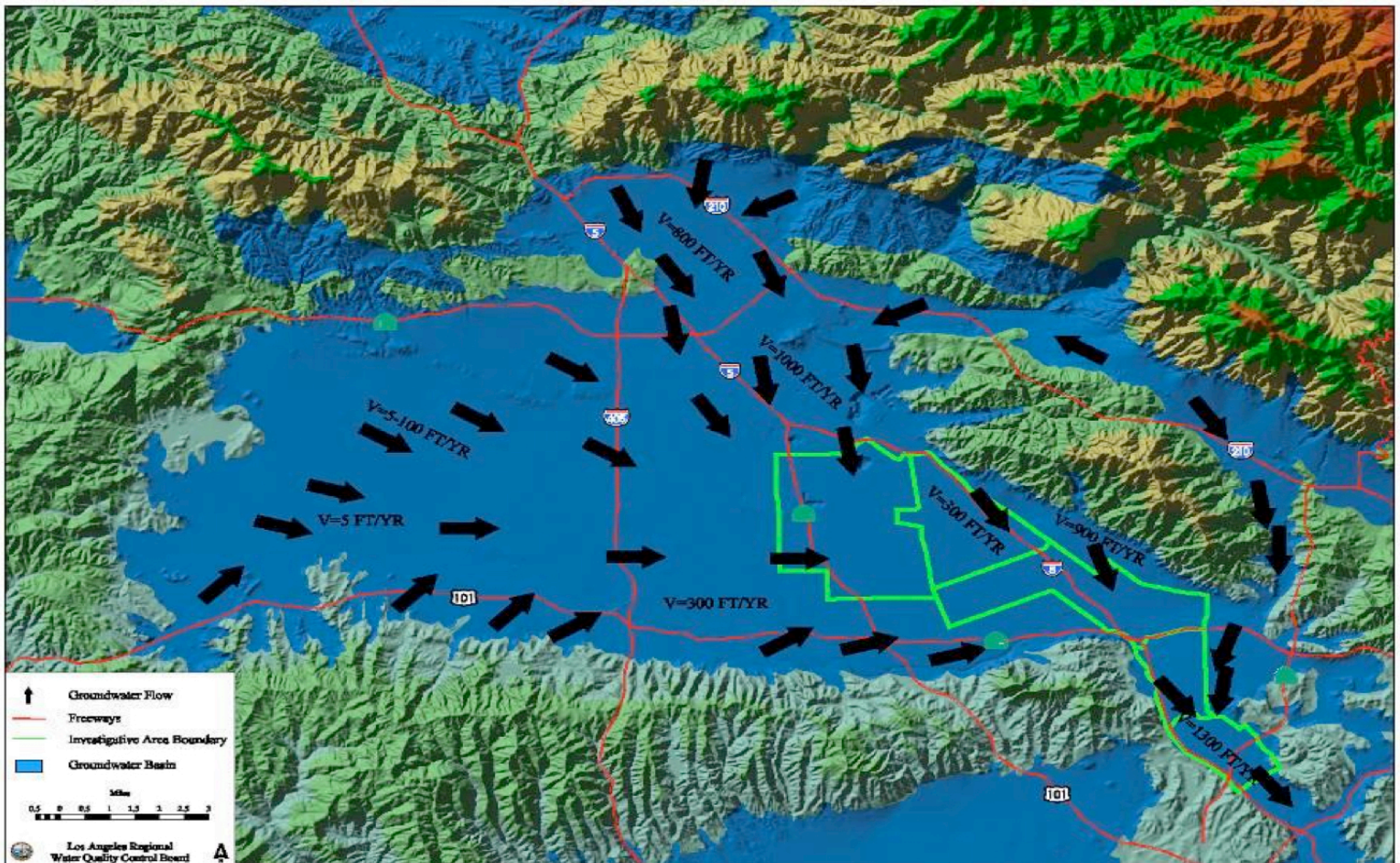
Prepared by Thomas Seckington, P.G.,C.H.G. Department of Toxic Substance Control (DTSC)

An example of Faults and how the groundwater is directed by these faults.



In the above illustration, provided by DTSC, we can see how faults can act as a contamination pathway. In addition the groundwater flow of the San Fernando Valley is from the Simi Hills to the east, fed by contaminated runoff and groundwater seeps.

SAN FERNANDO VALLEY: GROUNDWATER FLOW DIRECTIONS



CHATSWORTH RESERVOIR IMPROVEMENTS
BYPASS STORM DRAIN TUNNEL AND
CHANNEL - GEOLOGIC EXPLORATION

SEPTEMBER 1970

According to the above document, found in the records department of the Department of Water and Power - City of Los Angeles (DWP), a diversion tunnel was completed to take runoff from the SSFL away from the Chatsworth Reservoir water supply through a channel that goes underneath the CPWH and Hidden Lake properties to "improve the quality of water". This could be another potential pathway for contaminants to migrate impacting the areas surrounding CPWH. Photos of the diversion tunnel construction can be found on our affiliated website <http://www.chatsworthreservoir.com/1970s.html> There has been speculation on why the Chatsworth Reservoir was drained in the spring of 1969 and why it has remained dry for 40 years. With coverage of approximately 1,318 acres it seems illogical for that much acreage to remain vacant/dry for decades, fenced in and warning of no trespassing.

ACME recovered a 1954 report from from Atomic International regarding their Sodium Recator Experiment (SRE) at the SSFL and in case of an accident, the Chatsworth Reservoir could be placed out of service. The SRE suffered a Nuclear Meltdown in 1959 "A portion of the local runoff which originates on the east side of the Simi Hills is captured by the Chatsworth Reservoir. This drainage area is over 2 miles from the proposed site [SRE] and on the opposite side of the hills; the reservoir itself is approximately 4 miles east of the proposed site. It is a seasonal regulating and storage reservoir with a capacity of approximately 10,000 acre feet. The reservoir water is used for drinking and general domestic purposes except in the fall of the year when the water is used for irrigation. During this time potable water is rerouted from other reservoirs. This alternate Supply route could be used for an indefinite period of time in case of an emergency"

http://acmela.org/images/Prelim_Safety_Evaluation_SRE_Feb_19_of_1954.PDF

Could this be a possible route of contamination to CPWH? At the top of Fallbrook Avenue across from CPWH is the Rocketdyne Employees Health & Fitness Club where the radionuclide Cesium 137 was found in June of 1997.

http://www.etec.energy.gov/Health-and-Safety/Documents/RecreationCenter/LLNL_Recreation_Center.pdf

However, even the new facilities soon became inadequate, and a fifth building was added to the complex a short time later. In addition, facilities were also leased from Thompson Ramo Woolridge in its complex at Fallbrook Avenue and Roscoe Boulevard. The leased facilities housed the division's Research Department, along with part of the

Now lets move onto the CPWH site itself and in reference please click on the link below to the ACME Atomics International webpage... <http://acmela.org/atomicsinternational.html> Here you will find many of the CPWH related documents as well as some history that was presented to DTSC and Los Angeles City Planning Department that may have been overlooked by the Regional Board. When investigations of past use of the CPWH site were conducted research was limited to operations of property owners past and present that could have the potential to contaminate the groundwater with uranium and radium. They never investigated past leases. In the book Rocketdyne Thirty-Five Years in Power for America on page 40 it reads "[Atoms International] facilities were also leased from Thompson Ramo Woolridge in its complex at Fallbrook Avenue and Roscoe Boulevard. The lease facilities housed the division's Research Department, along with part of the engineering and power reactor development departments. The Research Department then became the nucleus for the North American Aviation (NAA) Science Center. In addition to creating Rocketdyne and Atomics International, NAA is the parent of The Boeing Co. who currently leases thousands of square footage at CPWH. There is a document related to the NAA Science Center that reports on April 25th, 1972 a "Glovebox" contaminated with the fission product Uranium-235 was transferred to the Science Center labeled "Clean" when in fact was not.





Many of the issues related to the SSFL came to light from the Regional Board and it's diligent efforts most recently in the reporting of the radionuclides found outfall 009 of the SSFL. With the San Fernando Valley losing groundwater resources to contamination http://acmela.org/images/DWP_Nahai_to_EPA_Nastri_San_Fernando_Groundwater_March_7_of_2008.pdf the Regional Board should take a stronger position on this issue and uphold the Clean Water Act, not allow it to be bent. To dismiss the Radiological findings of the Regional Board as "Naturally Occurring" without further investigation would be going against your mission statement. We need to ensure public health and safety by additional sampling and request the No Further Action be reconsidered.

Sincerely Concerned,

William Preston Bowling

Co-Founder/Director - ACME (Aerospace Cancer Museum of Education)

<http://www.ACMELA.org> 23350 Lake Manor Drive, Chatsworth, California 91311

cc: Cal EPA Secretary Linda Adams, Maziar Movassaghi & Rodney Collins - DTSC, Stefan Cajina - California Department of Public Health, Chris Nagler - Watermaster of the California Department of Water Resources, Bernard Franklin - Los Angeles County Department of Public Health, Assemblymember Audra Strickland, Rebekah Rodriguez-Lynn for Senator Fran Pavley, Christina Walsh - CleanupRocketdyne.org, Phyllis Winger for Los Angeles County Supervisor Greig Smith, Los Angeles County Supervisor Dennis Zine, Shelly Backlar - Friends of the Los Angeles River, Millie Jones for Los Angeles County Supervisor Michael Antonovich and former Atomics International employee Bonnie Klea.