



Cassandra Owens - Chief, Industrial Permitting Unit

4/15/2009

California Regional Water Quality Control Board Los Angeles Region (LARWQCB)

320 West 4th Street, Suite 200

Los Angeles, CA 90013 (via e-mail and U.S. Mail)

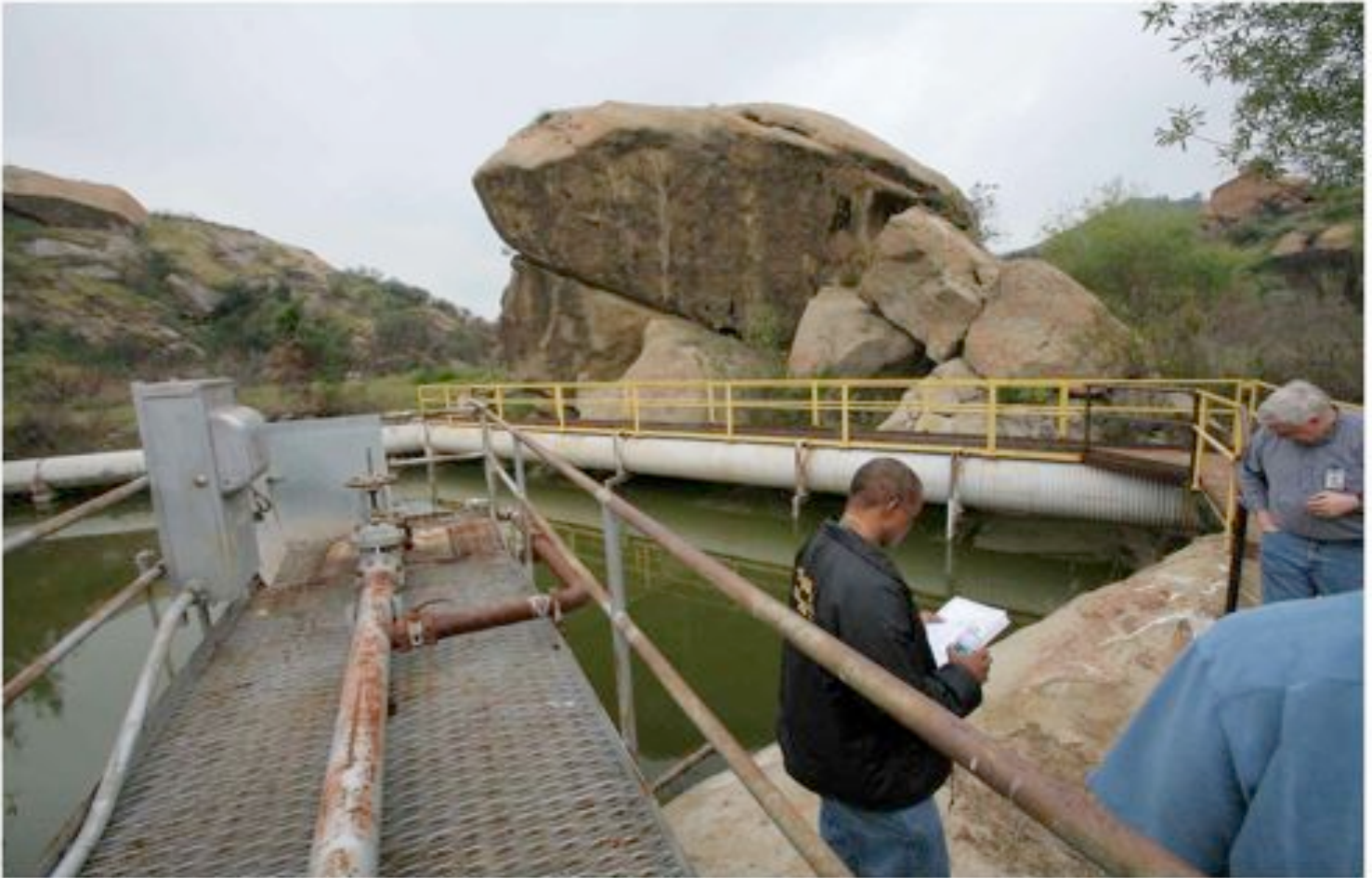
cc. Susan Callery DTSC, Shelly Backlar Friends of the Los Angeles River, David Beckman NRDC, Christina Walsh Cleanuprocketdyne dot org, Phyllis Winger for Los Angeles City Council District 12 Councilmember Greig Smith, Los Angeles City Council District 3 Councilmember Dennis Zine and Aron Miller for State Senator Fran Pavley.

Dear Ms. Owens,

ACME (Aerospace Cancer Museum of Education) is submitting comments to the LARWQCB documents provided on Tuesday, March 24th at 11:04 am via electronic PDF attachments. Commenting on the Background Information section of document Tent WDR R4-2009-00XX on the Santa Susana Field Laboratory (SSFL), it should include the Imminent and Substantial Endangerment Determination and Order (ISEO) and Remedial Action Order (RAO) issued by the Department of Toxic Substances Control (DTSC) dated November 1, 2007.



Page 22, Item #61 of the Tent WDR R4-2009-00XX should include that storm water runoff drainage from the Department of Energy (DOE) operated facilities of AREA IV are directed into the R-2 Pond and then discharged through National Pollutant Discharge Elimination System (NPDES) Outfall 018 in NASA AREA II which is Bell Canyon Creek, Headwaters to the Los Angeles River.



SEF06-00480-247

Page 30, Item #73 of the Tent WDR R4-2009-00XX should be corrected to reflect Millions of Gallons of TCE, from explained uses of TCE on Liquid Oxygen (LOX) areas to the TechLaw report (October 4, 1990 Final Report SSFL Air Force Plant No. 57 Site Operations/Ownership History prepared for the U.S. Army Corps of Engineers, Omaha District) that states the gallons of TCE determined was based ONLY on 8000 rocket engine tests, with numbers documented in various reports over the years as 30,000 to possibly 150 to 200,000 rocket engine tests the volumes of TCE would become a more staggering number. With a major TCE plume that impacts the Outfall 009 Watershed we have to take this into consideration. Also historical data attention is needed regarding prior uses of the B-1 area as a hot fuel research area and the areas surrounding the APTF that prior to draining into the CTL III area drained into the Northern Drainage via pipes and channels (Such As Building 984-Acid Bay, Building 266-Flow Analysis, Building 791- EL Test Cells, Building 359-North American Kindleberger Atwood (NAKA) Hazard Laboratory...

...Building 741-NAKA Firing Pit, Building 743-Oxidizer Storage Dock, Building 723-NAKA Chemical Storage, Building 400-Drum Storage and the Gas Flow Facility of Building 373. The TechLaw report also references several releases of TCE through accidental spillage. These numbers should be taken into consideration as well.

Page 35, Item #90 of the Tent WDR R4-2009-00XX speaks of the 2005 Topanga Fire resulted in significant alterations to the site, let this not sidetrack our goals or give the polluter a free pass as we are protecting the community from the contamination coming off this site no matter in what form a toxin is produced.



As noted in page 38, Item #96 of the Tent WDR R4-2009-00XX " The Discharger, as directed by the CDO (Order R4-2007-0056), assembled a panel of experts (Expert Panel) with experience in treating storm water flows utilizing engineered natural treatment systems (ENTS)" If we look back at the LARWQCB Interim Source Removal Action Work Plan (ISRAWP), On Page 3-4 it states "Restoration methods may be defined upon...

...consultation with the Surface Water Expert Panel retained by Boeing to support Engineered Natural Treatment Systems (ENTS) proposed within Outfalls 008 and 009.” Has the ENTS even yet been approved by LARWQCB or even by the National Aeronautics and Space Administration (NASA) who owns a large portion of this watershed? We also need to keep in mind the amount of Asbestos found during the removal actions of the ISEO and it’s RAO and continue looking at Asbestos as a concern.



Going back to the ISRAWP once again, Sec. 1.1.1 – SSFL Ownership and History, pg. 1-2: “The Work Plan states that surface water discharges from Area IV do not flow to either Outfall 008 or Outfall 009.” Is this to say we are not to be looking for radionuclides? The figure below shows the NASA portion known as the ELV a.k.a. CTL II, Well RD-70 and it’s watershed has high levels of radionuclides according to the 1993 McLaren-Hart Study. This is disturbing as this drainage passes just outside of Outfall 009. We once again need to assure the Brandies-Bardin Campus of the American Jewish University we are doing everything we can to keep their camp from inheriting the issues of the SSFL. Outfall 009 needs to be lower into the canyon to include the RD-70 watershed or add another Outfall. This area has been overlooked several times as it is the recently purchased Northern Buffer Zone and is rarely looked at. Radionuclides should be in the suite of sampling.

90% of all perchlorate manufactured is for the aerospace and defense industry, this needs to be remembered when discoveries of up to 1100 rocket engine igniters that contain perchlorate in the Northern Drainage and the discover of perchlorate in the Outfall 008 Watershed are dismissed by DTSC with an issue of No Further Action brings forth new housing. The future families who are to live in this new development should not have to worry about additional perchlorate migrating down from the SSFL.

In your cover letter to Mr. Thomas D. Gallacher, SSFL – Safety, Health & Environmental Affairs, The Boeing Co. "Tentative Requirements" Informing the Public by Posting is to be done. Can you please point me in the direction of where these posting are located and what time frame where they displayed whether in an online or printed/posted format.

William Preston Bowling

Founder/Director
ACME (Aerospace Cancer Museum of Education)
williamprestonbowling@yahoo.com
310.428.5085
<http://www.ACMEla.org>
23350 Lake Manor Drive
Chatsworth, California
91311

Parting Shot...



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