



3/31/2009

Tracy Egoscue
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Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, California 90013
(Via U.S. Mail and E-mail)

cc: Cassandra Owens RWQCB, Peter Raftery RWQCB, Thomas D. Gallacher BOEING, Allen Elliot NASA, Norm Riley DTSC, Gerard Abrams DTSC, Shelly Backlar FoLAR, David Beckman NRDC, Dan Hirsch CBG, Christina Walsh CLEANUPROCKETDYNE dot org, Greig Smith L.A. City Council District 12, Ventura County Supervisor Linda Parks, Assembly Member Julia Brownley, Senator Fran Pavley.

Dear Ms. Egoscue,

Enclosed please find my comments on the Interim Source Removal Action Work Plan (ISRAWP) of the Santa Susana Field Laboratory (SSFL). SOURCE REMOVAL is the only way we can guarantee a healthy future in the San Fernando and Simi Valley's.

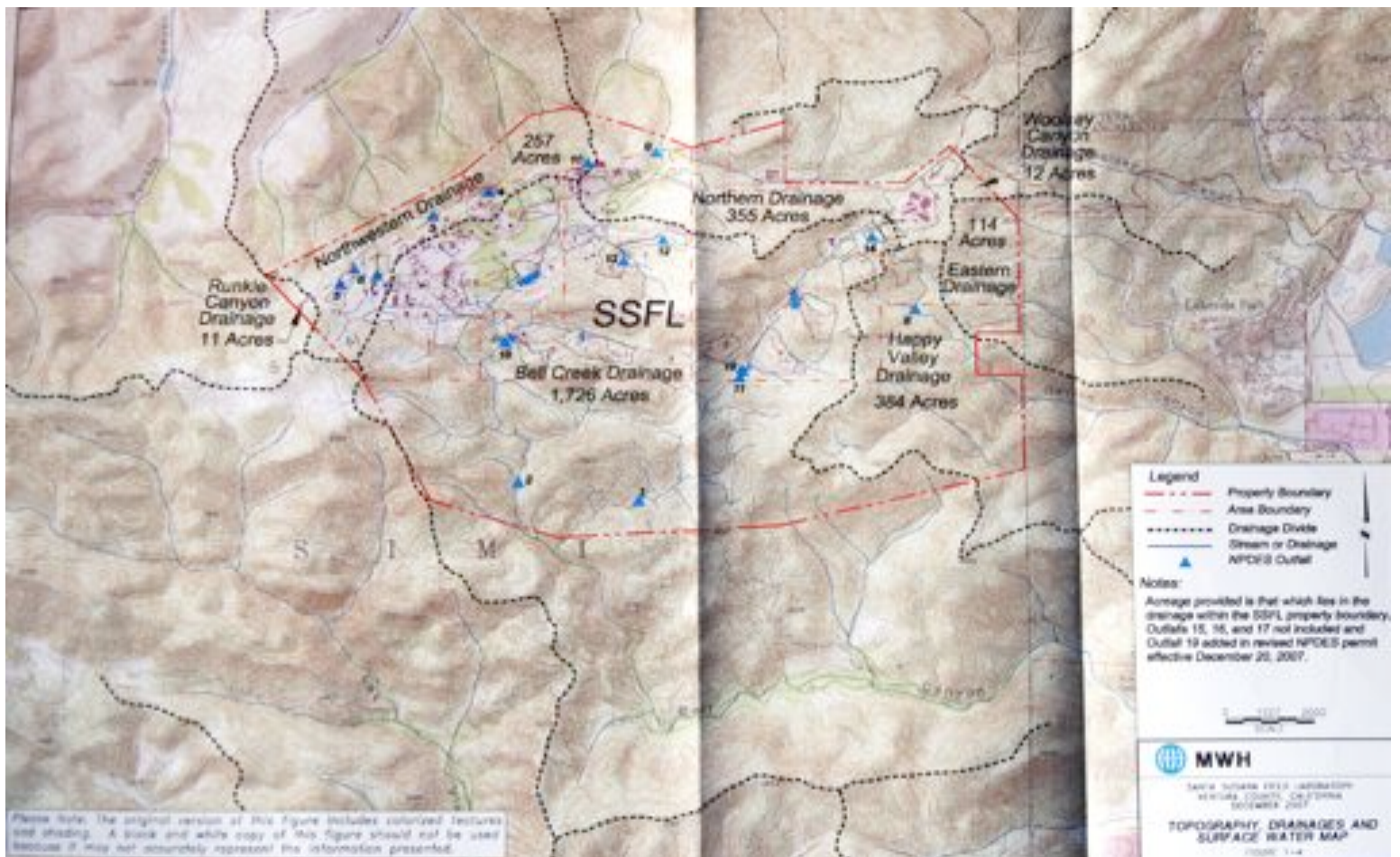
On page 1-4 of the ISRAWP it states "although the discharge of treated groundwater is permitted at a single location." Where is this location is it still discharging in 2009?

On this same page it reads "Regional surface water drainage patterns and the overall locations of Outfalls 008 and 009 are shown in Figure 1-3. The majority of the surface water (estimated at greater than 60%) from the SSFL runs off the southern property boundary through Bell Canyon and into Bell Creek, which subsequently discharges into the Los Angeles River. The eastern portion of the facility drains through Dayton Canyon into Dayton Creek and combines with Bell Creek downstream before joining the Los Angeles River. The northwestern perimeter of the site drains northward into Meier Canyon, which subsequently discharges into Arroyo Simi. The northeastern and north-central portions of the SSFL drain into an east-west trending drainage, herein called the 'Northern Drainage', which connects to the Meier Canyon Drainage north of the SSFL on property owned by American Jewish University / BBC. Three other small parcels of the SSFL that have had no operations convey storm water runoff through three other drainages (i.e., Runkle Canyon, Woolsey Canyon, and Eastern drainages). Two issues here, if the City of Los Angeles plans on revitalizing the Los Angeles River at a cost of billions, RWQCB needs to assure people that it's headwaters are not bringing down pollution. The other end of it we have a Camp for Children and Adults that has found Chemical and Radiological Contamination on their property, RWQCB needs to assure people that this side of the hill is safe as well.



Although it may have no relation to National Pollutant Discharge Elimination System (NPDES) permit issued by the RWQCB for outfalls 8 and 9, it should be noted that the Woolsey Canyon drainage reaches the Los Angeles River via the Chatsworth Creek Diversion tunnel construction in 1969 to “Improve the quality of water” in the now dry Chatsworth Reservoir. Near the top of the Woolsey Canyon drainage there is a plume of Trichloroethylene (TCE) that is currently to be found migrating offsite of the SSFL.

To make sure we get this right, on page 2-1 of the ISRAWP it states “The Outfall 008 watershed encompasses approximately 62 acres and is primarily open space with no anthropogenic impervious surfaces.” The same company that issued this data, MWH, reports that The Happy Valley Drainage is 384 Acres (Source: MWH Topography, Drainages and Surface Water Map Figure 1-4 from the December 2007 Offsite Data Evaluation Report). One could say that the Outfall 008 Watershed is the entire 384 acres, not just the 64 surrounding this Outfall. Why was the map shown below not used in this case? We need to get this right as Outfall 008 Watershed impacts the Los Angeles River.



Anthropogenic Impervious Surfaces, to put this in English...In this case, Areas that are not destroyed by the building and demolition process, their natural state. There are several roads, wells, best management practice (BMP's), man-made rock rip-rap walls, inflatable dams, sprinkler systems and gravel strewn everywhere. This area is not currently in it's natural state as seen below.



So much of the natural habitat is destroyed and spraying contamination is visible from Google Earth.



On page 3-3 of the ISRAWP the depth of exceedance could be deeper than what we realize due to the fact they are finding contamination sources deeper than the required 2 feet in depth. In some cases we found contamination and debris underneath 30-year old oak trees, this debris has been impacting the Outfall 009. In some cases after heavy rains more Lead Shot has become visible and upon investigation it goes deeper.



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 RWQCB or even by the National Aeronautics and Space Administration (NASA) who owns a large portion of this watershed? Also on Page 3-4 it state "Potential source removal alternatives are provided in Table 3-1" this table looks incomplete and the only alternative that will stop contamination from continuing to migrate offsite onto the Brandies-Bardin Campus of the American Jewish University, the Santa Monica Mountains Conservancy Parkland of Sage Ranch and the L.A. River is Excavation and Offsite Disposal.

Table 3-1
Source Removal Alternative Evaluation Matrix
(Page 1 of 1)

Source Removal Alternative	Short-Term Effectiveness	Long-Term Effectiveness	Long-Term Reliability	Implementability	Environmental Impact / Sustainability	Cost
Installation of a Cap/Cover						
Onsite Treatment - Flotation - Thermal Treatment						
Excavation and Offsite Disposal						

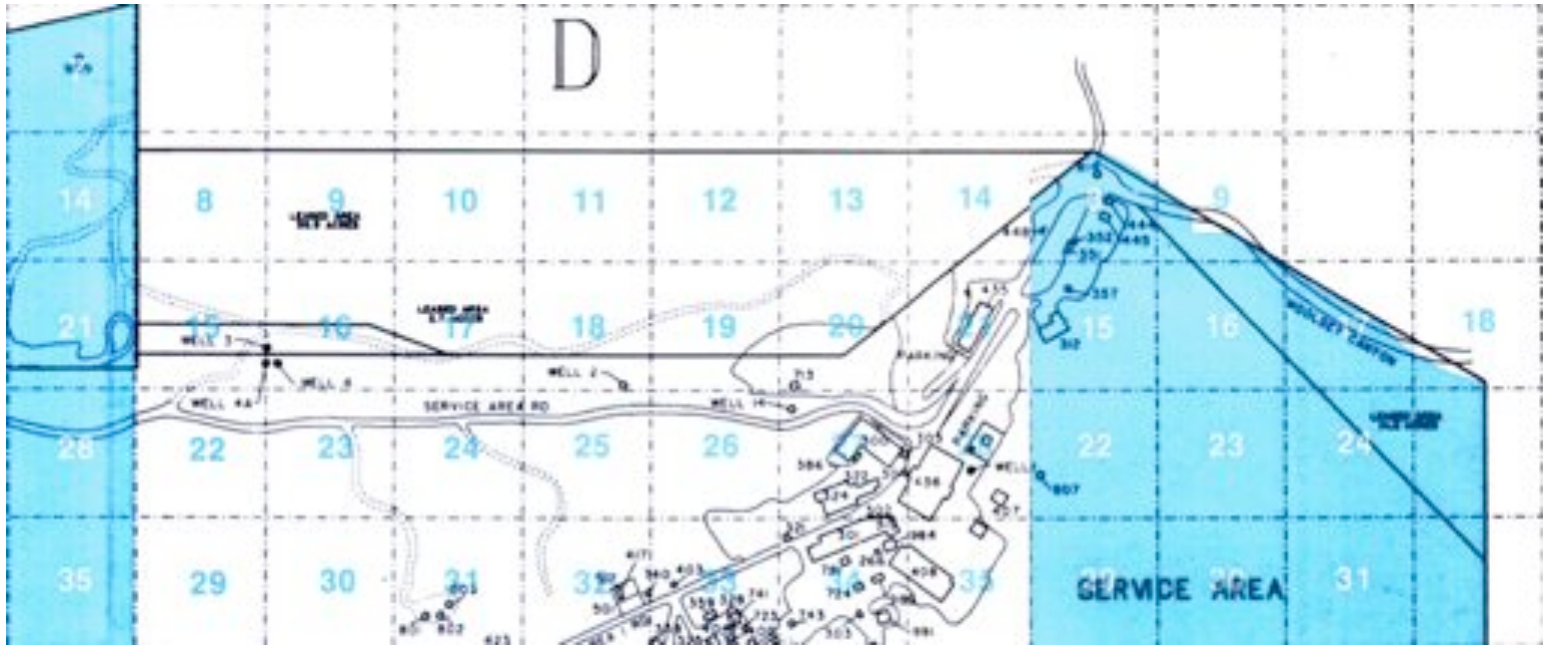
General Notes:
The RWQCB ISRA CAD requires the following:

- Address the sources that are discharging the constituents that exceeded NPDES Permit limits within the Outfall 008 and 009 watersheds;
- Use methods to minimize impacts to the streambed adjacent to habitat during cleanup activities;
- Protect the water quality during and after cleanup activities; and
- Restore the streambed and surrounding habitat following cleanup activities.



They are bringing in large pipes and installing them as we speak in a pre-emptive building of the ENTS. Is the Boeing Co. allowed to do this if the ENTS has not yet been approved?

SOURCE REMOVAL is the only way we can guarantee a healthy future in the San Fernando and Simi Valley's. We need to take into consideration all past operational areas. In this portion of the 1984 Rockwell Map (30095-P-G) you will notice what are referred to as "Leased areas." Over 60 acres in sections D, 8 through 20 are contributing to the contamination of the Outfall 009 Watershed...



We have seen this first-hand with recent findings of over 1100 Rocket Igniters and other Aerospace trash.



With a major TCE plume that impacts the Outfall 009 Watershed we have to take into consideration the 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.

Let's go back to 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 1193 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.



What are the federal funding constraints for work that will be performed on NASA property as mentioned on Page 3-4? ACME was told that NASA is IN FAVOR of Source Removal Actions.

I would like to submit the following SSFL Site Characterization Report created by Christina Walsh of CleanUpRocketdyne.org with images provided by ACME as it pertains to both outfalls 008 and 009

http://www.cleanuprocketdyne.org/documents/curo_eir/FebCommunityCUROC08.pdf

Below you see the AREA II Landfill, this is a big Source of Contamination and needs to be removed in order to assure a clean watershed for Outfall 009.



According to Appendix B of the Site Operations/Ownership History of the SSFL Prepared for the U.S. Army Corps of Engineers (USACE) Prepared by TechLaw, Inc in 1990, the Interview Summary of Former Employee Rolf D. Schmued "A Second Landfill was in AREA II. Numerous Chemicals, possibly some from Canoga (Currently owned by Pratt-Whitney Rocketdyne), were buried there.

Mr. Schmued was aware of two landfills at SSFL. One was located behind the maintenance shop and was operated before he had much contact with SSFL. He believed that only hardware, not chemicals, were disposed of there. A second landfill was in Area II. Numerous chemicals, possibly some from Canoga, were buried there.

In order for the ISRAWP to work, we need a Comprehensive identification, evaluation, and remediation of soil contaminated by chemical and radiological materials in the areas that contribute to Outfall 008 and 009. Data on the background levels should come from both DTSC and EPA since EPA has their experts working on the radiological background. RCRA risk drivers and contributors should be specifically listed.

In regards to the Source Delineation and Data Gap Sampling, pg. 3-3: Soil data gap samples must be analyzed for more than the COCs identified in the watershed. The Water Board's COCs list is insufficient to account for the soil contamination of the site.



The AREA I Landfill is a source that contributes contamination from runoff into Outfall 009 as well

As the Northern Drainage & Happy Valley sources sit in limbo contamination continues to migrate offsite.

In closing I want to stress that the removal of National Pollutant Discharge Elimination System (NPDES) permit issued by the RWQCB of Outfall 2 is going to have a huge impact on the Los Angeles River and re-instatement should be considered. This former Outfall is currently at more risk of releasing Chemical and Radiological runoff into the Los Angeles River due to the fact that STL IV a.k.a. CTL IV has been removed in it's entirety. This facility had drainages, natural, concrete and impoundment ponds that have been in place for nearly 50 years and this area is now an empty field of soil waiting to be characterized. The next storm will bring this sediment down Bell Canyon into the Los Angeles River. We need to know if these amounts could be of a potential danger.

Thank you in advance for all the hard work you have ahead of you and thank you for continuing to keep ACME in the loop on all correspondence regarding the issues of the Santa Susana Field Laboratory.

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Parting Shot...

