Linda S. Adams
Secretary for
Environmental Protection

Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630

Arnold Schwarzenegger
Governor

MEMORANDUM

TO: Gerard Abrams, C.HG.
Senior Engineering Geologist
Brownfields and Environmental Restoration Program

FROM: Laura Rainey, P.G.
Senior Engineering Geologist
Geological Services Unit
Geology and Remediation Engineering

DATE: July 30, 2008

SUBJECT: COMMENTS ON THE RCRA FACILITY INVESTIGATION WORK PLAN, AREA I BURN PIT – SOLID WASTE MANAGEMENT UNIT (SWMU) 4.8 SANTA SUSANA FIELD LABORATORY, VENTURA COUNTY, CALIFORNIA

PCA 22120 Site Code 300232-48 MPC 37

As requested, the Geological Services Unit (GSU) at the Department of Toxic Substances Control (DTSC) reviewed the "*RCRA Facility Investigation Work Plan, Area I Burn Pit – Solid Waste Management Unit (SWMU) 4.8* "(Work Plan). The RCRA Facility Investigation Work Plan (RFI Work Plan), dated November 2006, was prepared by Haley & Aldrich, Inc. for the Boeing Company (Boeing).

The Area I Burn Pit covers approximately 5.8 acres and is located in the southern portion of Area I of the Santa Susana Field Laboratory (SSFL). The Work Plan was submitted to DTSC in response to DTSC's letter dated August 30, 2006, titled *"Requirement for Submittal of RCRA Facility Investigation Work Plan and Information Regarding Area I Burn Pit (Including the Thermal Treatment Facility), Santa Susana Field Laboratory, Ventura County".*

On February 29, 2008, DTSC met with Boeing to provide preliminary comments regarding the RFI Work Plan. Comments provided by GSU during the meeting are summarized in the "General Comments" section below. In response to GSU's comments, Boeing submitted a draft Addendum to the RFI Work Plan, dated May 5,

2008. The draft RFI Work Plan Addendum (Addendum) was prepared by Haley & Aldrich, Inc. for Boeing. Both the draft Work Plan and Addendum are posted on DTSC's SSFL web site: http://www.dtsc-ssfl.com

Both of these documents were made available for public review and comments. The public comment period was from May 7, 2008 through June 23, 2008. On May 21, 2008, DTSC hosted a Public Open House in Simi Valley, followed by a presentation describing the Area I Burn Pit investigation. GSU's comments below address general public comments received during the public comment period.

The draft Work Plan and Addendum specify sampling locations and methods to find chemical and radioactive contamination in soil, sediment and soil vapor at the Area I Burn Pit, the Thermal Treatment Facility, and adjoining areas, collectively known as the "Area I Burn Pit Area." The sampling results will become part of an investigation report, which will later be released for public review and comment.

Based on additional information provided in the Work Plan Addendum, GSU believes the scope of work proposed for the investigation of the Area I Burn Pit to be generally adequate to address the nature and extent of contamination from historical operations. The scope of work also incorporates radiological screening and characterization in order to address uncertainties regarding the potential historical usage of radiological materials in the Burn Pit area. GSU recommends that all comments summarized below be addressed, and that a revised Work Plan and Work Plan Addendum be submitted for DTSC's review.

GENERAL COMMENTS

1. **Multi-media evaluation:** A multi-media evaluation of previously detected contaminants is lacking in Work Plan. No discussion is provided in the Work Plan of historical groundwater detects in nearby wells, nor of historical detects in surface water. This information is needed to cross check data between various environmental media to ensure that the appropriate chemicals are being investigated in the appropriate media. Public comments have reiterated the need to ensure that the scope of work for characterization adequately addresses all environmental media and potential contaminant migration pathways.

   Response: Boeing agreed to provide the following to DTSC: discussion/data for historical detects in groundwater for nearby wells (RD-03, RS-07, RD-48 cluster) and surface water data from nearby NPDES monitoring locations (outfalls 1 and11). This information is included in Appendix A of the draft Work Plan Addendum. GSU reviewed this information, and finds that it satisfactorily supports the proposed scope of work.

Note that groundwater from nearby well RD-03 had historical detects of VOCs that exceeded their respective Maximum Contaminant Levels (MCLs). In 1989, groundwater data for gross alpha, gross beta, and tritium were collected from well RD-03. Groundwater from nearby well RS-07 also had historical detects of VOCs. Strontium and sulfate have been detected at concentrations at or near their associated groundwater comparison concentrations. Groundwater quality in the RD-48 well cluster also had historical detects of VOCs.

Several metals (total chromium, copper, iron, lead, manganese, and mercury) have historically had enforceable permit limit exceedances in surface water at Outfall 001. Surfactants and dioxins have also had exceedances in Outfall 001. Dioxins have also had enforceable permit limit exceedances in Outfall 011, which is located closer to the Area I Burn Pit.

2. **Historical drainage:** A former drain pipe transmitted discharge from the Area I Burn Pit to the Perimeter Pond. This potential contaminant transport pathway is not described in the Work Plan. Data from the Perimeter Pond area is needed for comparison to the proposed scope of work to ensure that the appropriate chemicals are being investigated in the Area I Burn Pit area. Public comments have expressed the need to evaluate the potential contaminant migration pathway from the Area I Burn Pit to the Perimeter Pond.

   Response: Boeing agreed to provide description of recent results from the Perimeter Pond. This information is included in Appendix B of the draft Work Plan Addendum. GSU reviewed this information, and finds that it satisfactorily supports the proposed scope of work.

   Soil sample results from the Perimeter Pond show detected concentrations of dioxins and furans, total petroleum hydrocarbons, VOCs, SVOCs, inorganics and metals. Numerous tentatively identified compounds (TICs) were detected in sediment samples from the Perimeter Pond.

   Recommendations: GSU recommends that the SVOC TICs identified in the Perimeter Pond be evaluated in soil samples collected from the Area I Burn Pit that are upstream and along this potential contaminant pathway to the Perimeter Pond.

   GSU concurs that the scope of work proposed, along with GSU's recommendations, should be adequate for characterizing this potential contaminant migration pathway from Area I Burn Pit to the Perimeter Pond. The Perimeter Pond itself will be investigated as part of the larger RFI Group 1B

investigation. The Group 1B RFI Report will comprehensively evaluate the RFI results for all units in the group area (including the Area I Burn Pit and the Perimeter Pond).

3. **Burn pit history:** The Area I Burn Pit area appears to have undergone various configurations through time. It is important to understand the evolution of the locations of the site features in order to ensure adequate sampling coverage for the area. A detailed chronology of the historical layout of the burn pit area is needed, and does not appear to have been provided in the Work Plan.

   Response: Boeing agreed to provide information on the chronology of burn pits, based on review of historical documents and aerial photographs. As a result, additional efforts were made to identify and obtain additional historical aerial photographs to provide more detailed time coverage for the Area I Burn Pit. H&A provided a detailed chronology of the evolving configuration of the Area I Burn Pit area, based on review of the available historical aerial photographs, including the additional ones recently obtained. Copies of the historical aerial photographs and a detailed chronological description are included in Appendix C of the draft Work Plan Addendum. Based on this extensive review, additional soil samples will be required to additional historical cover features that were identified. A summary of the proposed sampling locations (including additional samples required and modified sampling locations) is presented in Table1 and Figure 1 of the draft Work Plan Addendum.

   GSU reviewed the available historical aerial photographs obtained along with the site chronology description, and worked with H&A to develop the modified sample location map that is included as Figure 1. Based on this review, GSU concurs with the expanded modified scope of work described in Table 1 and Figure 1 of the draft Work Plan Addendum.

4. **CTL-III leach field:** A leach field associated with CTL-III appeared to possibly be near Area I Burn Pit on a historical drawing provided in the Area I Burn Pit Work Plan historical documents. GSU requested clarification of the location of this historical feature, in order to determine if it will affect the proposed scope of work.

   Response: Boeing provided a map dated 1959, showing the CTL-III “Leaching Field” with associated Septic Tank and Distribution Box (see Appendix D of the draft Work Plan Addendum). These features were located southwest of CTL-III, on the other side of the perimeter pond. GSU concurs that the features are sufficiently far enough away to allow their investigation to be included with the investigation of the CTL-III RFI site that is being conducted as part of the larger

RFI Group 1B investigation, as well as the site-wide Chatsworth Formation investigation.

5. **Status of response to previous DTSC Area I Burn Pit technical memorandum dated February 14, 2007:** DTSC previously provided a technical memorandum summarizing comments developed based on a preliminary review of the historical documents submitted with the Work Plan. Key objectives of the review were to identify information included in the documents that may suggest potential handling of radiological materials at the Area I Burn Pit, identification of off-site sources of materials handled at the Area I Burn Pit, and other information that could potentially affect the scope of work described in the Work Plan. GSU requested an update on the status of Boeing's response to the technical memorandum. As of the date of the meeting to discuss GSU's preliminary comments (February 29, 2008), Boeing had not yet responded to the memorandum.

   Response: Boeing's response to the technical memorandum is included in Appendix E of the Work Plan Addendum. With respect to the uncertainties from possible past handling of radiological materials at the Area I Burn Pit, radiological screening during the proposed characterization will be utilized to address these uncertainties. With respect to uncertainties regarding the varying historical operational layout of the burn pit area, additional historical review has been conducted and additional samples have been added to address these uncertainties (see General Comment No. 3.)

6. **Sealed Radioactive Materials Source use in Area I:** During the public comment period, community members provided a copy of a Radioactive Materials (Strontium 90) License (No. 4-4292-1), issued by the U.S. Atomic Energy Commission on November 10, 1958. This license was issued for use at "Area I, Research Center Building, Chemistry Laboratory". GSU requested additional information regarding this license in context of usage of radiologic materials in Area I, as well as potential handling of such materials at Area I Burn Pit.

   Response: A copy of the license and clarification regarding the issuance of the license is included in Appendix F of the Work Plan Addendum. Based on this response, GSU understands that the sealed source was utilized in analytical equipment used at the chemistry laboratory for analysis of hydrogen carbon ratios in hydrocarbons. Boeing's response describes the tracking of the history of licensing of this particular sealed source through time, up through its removal from the site and transfer (under license) to another facility. The licensing

process for past usage of this particular sealed source radioactive material in Area I appeared to allow for tracking of its use while at the site.

7. **Radiological screening procedures:** Based on the uncertainties regarding the potential historical handling of radiological materials at the Area I Burn Pit, GSU requested that the radiological screening procedures described in the Work Plan be reviewed and revised to ensure that the screening methods are sufficiently conservative to address these uncertainties. DTSC has discussed the basis for additional review of these procedures with the California Department of Public Health (CDPH). As a result, CDPH reviewed and recommended revisions to the screening procedures. Revisions include a more detailed description of field screening and laboratory analytical methods, as well as revised field screening equipment to ensure appropriate instrument detection levels. In addition, procedures are also included for collection and analysis of split samples for radioisotope analysis at an outside laboratory. Methods for characterizing investigation derived waste are also included.

   Response: An updated, revised description of radiological screening procedures is included in Appendix G of the Work Plan Addendum. This revised procedure incorporates the recommendations made by CDPH.

   Recommendation: The protocol references use of an existing radiological soil background dataset. Current efforts are underway between various state and federal agencies and the local community to establish a new radiological background data set. The results from this investigation should utilize the new background data set once it becomes available.

8. **Air dispersion contaminant modeling:** In important aspect of this investigation involves addressing the potential migration of contaminants through air dispersion. The historical burning and/or destruction of chemicals released clouds of smoke into the air. Through time, dispersion of these clouds down-wind could potentially result in deposition of contaminants to the surrounding soil. The Work Plan proposes sampling of soil around and outside of the facility boundaries to assess whether these contaminants may have migrated to these areas via air dispersion and impacted soils by atmospheric deposition.

   Public comments have reiterated the need to ensure that samples are collected at sufficient distances to adequately address this potential contaminant dispersion pathway. The Work Plan proposes use of an air dispersion model to support the locations and distances of the proposed sample locations. Since the proposed model was proprietary (not agency-approved), GSU requested assistance from the California Air Resources Board (ARB) to review the Work

Plan and provide recommendations for an appropriate model to use to verify the proposed locations and distances for sample locations. In response, the ARB recommended use of "OBODM" for modeling to identify potential depositional areas from historical open burning events at the Area I Burn Pit. This model is readily available and is U.S. EPA –approved.

Response: A revised proposed air modeling protocol is included as Appendix H of the Addendum, which generally incorporates ARB's recommendations, with one exception. After review of the revised protocol, ARB requested inclusion of a discussion of use of on-site meteorological data with adjustments to the wind direction that takes into account terrain effects at the burn pit area. Boeing has agreed to revise the protocol to incorporate ARB's recommendation.

Recommendation: Revise Addendum by incorporating a revision to the air modeling protocol (Appendix G) to address ARB's comment. Also, attachments cited in Appendix A of the Work Plan were missing and are not included. These should be included in Appendix A of the Work Plan.

9. **Review Process and Schedule:** This memorandum addresses general characterization issues raised by the public during the public comment period. More specific responses to public comments will be submitted under separate cover. GSU notes that although the overall scope of work described in the Work Plan and associated Addendum appear acceptable, certain aspects of characterization requirements may apply under Senate Bill 990 (SB990). In these cases, use of risk-based criteria for determining step out samples, such as risk-based screening levels (RBSLs) may be dependent of risk-based parameters yet to be agreed upon for the rural residential exposure scenario. GSU understands that Boeing desires to proceed with characterization in the summer of 2008 following receipt of agency approval of the Work Plan and Addendum. Boeing should be aware that there is a certain risk to proceeding with characterization if RBSLs are used for determining step outs. GSU recommends that this issue can be dealt with, at least in part, by utilizing the lowest achievable method reporting limits for relevant constituents as well as allowing sufficient distances for collection of step out samples.

   GSU recommends that the RFI Work Plan be revised to incorporate information presented in the draft Work Plan Addendum (including additional proposed sample locations), plus other recommendations presented herein. Submittal of an updated finalized RFI Work Plan and associated Addendum under a single cover letter is acceptable. The updated Work Plan should include the revised figure and table showing expanded scope of work. Assuming that all recommendations are addressed in the revised Work Plan and Addendum, GSU recommends approval

of the revised Work Plan be granted with the condition that the characterization be conducted with the intent of ultimate compliance with SB990 requirements.

SPECIFIC COMMENTS (WORK PLAN)

1. **Section 1, Introduction:** This Work Plan was submitted prior to implementation of Senate Bill 990 (SB990). SB990 affects the scope of work for characterization in terms of use of RBSLs for determination of the need for additional step out samples (see General Comment No. 9). This issue is not addressed in the Work Plan or Addendum.

   Recommendation: GSU recommends that a statement be included in the introduction that Boeing intends to conduct the characterization with the intent of ultimate compliance with SB990 requirements.

2. **Section 2, Previous Investigations:** Although the analytical reports for samples from the earliest investigations (early 1980's and 1990) are included, the Work Plan indicates that soil sample locations were not reported. Given the size of the burn pit area and knowledge of historical configuration of the burn pit features, the data still provides useful information. On page 8 (Section 2.1.6 April 2005, first sentence), please revise reference to "Burn Pit 2" to "Earth Pond 2".

3. **Section 3, Proposed Sampling:** The scope of sampling proposed in this section has been expanded, based on additional historical review, and is presented in Table 1 and Figure 1 of the Work Plan Addendum.

   Recommendation: Replace Table IV and Figure 10 of the Work Plan with Table 1 and Figure 1 of the Work Plan Addendum.

4. **Section 4, Field Methodology:** Section 4.1 indicates that if soil excavated from exploratory trenches is characterized and classified as non-hazardous, it may potentially be placed as backfill into the trenches, if DTSC concurs. It also states that if DTSC determines it is not appropriate to backfill exploratory trenches with non-hazardous excavated soil, then imported or onsite borrow soil or crushed rock will be used for fill material. GSU recommends that all investigation derived waste be appropriately characterized and based on its classification, be legally disposed of. If excavated soil is characterized and classified as non-hazardous, the default should be to dispose of it as non-hazardous material. Under no circumstances will excavated soil that is characterized as hazardous waste be allowed for use as backfill in the trenches. It is possible that under limited circumstances, some non-hazardous excavated soil having concentrations

exceeding background may be allowed for use as backfill. This scenario may potentially occur if non-hazardous soil is excavated from an area that will be subject to future larger scale cleanup actions. For this type of scenario, Boeing should contact DTSC once the stockpile analytical and overall investigation results are available to determine the appropriate disposition of the excavated soil.

Regarding Section 4.2.1 (Soil Vapor Screening), the Work Plan states that soil vapor samples will be collected at a depth of approximately 3 feet below land surface (bls) where depth to bedrock is 5 feet or less. The Work Plan also states that soil vapor samples will be collected at 3 feet bls and at the top of bedrock, at locations where bedrock is greater than 5 feet bls. GSU does not concur with this, and recommends that soil vapor samples be collected at the top of bedrock, when bedrock occurs from 3 feet bls or deeper. Where bedrock is greater than 5 feet bls, soil vapor samples should also be collected at 5 feet bls, in addition to a sample depth just above bedrock. Section 4.2.1 should also include a description of methods for soil vapor leak detection testing that will be used for the soil vapor survey. DTSC guidance that addresses soil vapor sampling has been updated during the history of SSFL's RFI. Please include more specific citations for the "DTSC guidance and required protocols" that will be followed during the soil vapor survey.

Regarding Section 4.2.2 (Soil and Sediment Sampling), step out borings for soil sampling may also be warranted based on analytical results from characterization. GSU concurs with the proposed methods for sediment sampling in the drainage channel. GSU does not yet concur with the proposed distances for collection of sediment samples to evaluate the air dispersion of chemicals from the Area I Burn Pit. The actual proposed sample distances should be demonstrated to be appropriate by use of air dispersion modeling. This modeling should be conducted using an agency approved model as well as approved input parameters. At DTSC's request, the California Air Resources Board has recommended an air dispersion model (OBODM) and has provided input regarding use of this model. Appendix H of the Work Plan Addendum summarizes the use of the OBOD model and generally addresses the Air Resources Board's recommendations (see General Comment No. 8).

Regarding Section 4.2.3 (Exploratory Trenching Sampling), the locations of samples will also be guided by analytical results from the characterization activities. GSU concurs with the proposed locations of the trenches. Public comments have questioned whether the hummocky areas have sufficient trenching. Based on review of the trench locations, the density of trenches appears to be adequate. For example, the proposed trenches in the western

hummocky area are located approximately 40 to 80 feet from each other throughout the disturbed area, which is of sufficient density. Should analytical results indicate the need for additional step out sampling, then additional trenches and/or borings may be warranted.

5. **Table IV, Summary of Proposed Sampling Locations:** The scope of work described in this table in the Work Plan has been revised, and is included as Table 1 in the Work Plan Addendum. GSU recommends that Table IV be replaced with Table 1 of the Addendum (see General Comment No. 3). GSU generally concurs with the scope of work described in Table 1 of the Work Plan Addendum, as long as GSU's comments presented herein are addressed.

   Recommendations: Under the "Proposed Sampling" column of Table 1, samples should be collected at 0.5 ft bgs, between 3-5 ft bgs, and just above bedrock (if bedrock is deeper than 5 feet bgs). Include analyses of SVOC TICs that were identified in samples from the Perimeter Pond for Area I Burn Pit samples collected from historical upstream locations to the Perimeter Pond. Also, while GSU concurs that samples having elevated TPH in the oil range be analyzed for PCBs, GSU does not necessarily concur with holding proposed PCB samples for analysis only if they have elevated TPH in the oil range (>1000 mg/kg). This analytical criterion does not appear to be appropriate, as other soil samples at SSFL have had detected concentrations of PCBs under conditions that have not demonstrated elevated TPH in the oil range. GSU recommends analysis of samples for PCBs where proposed, regardless of the TPH oil range results. Also, GSU does not necessarily concur with the holding of samples for analysis of hexavalent chromium pending total chromium exceedance of background. GSU recommends that source area samples be analyzed for hexavalent chromium, where proposed, regardless of the total chromium concentration.

6. **Appendix A, Quality Assurance Project Plan:** In Section 2.1.1, GSU notes that bedrock is not listed under the objectives of the RFI. Saturated bedrock is being addressed under the Chatsworth Operable Unit RFI. Unsaturated bedrock in the vadose zone is indirectly addressed, at least in part for volatile organic compounds, through monitoring of soil vapor during the RFI. Section 2.3.5 (Develop Decision Rules) states that sample analytical results will be evaluated against the SRAM Guidance Levels. Please note that this evaluation is to some extent dependent on the requirements of SB990. See General Comment No. 9. Section 2.3.7: GSU concurs with the rationale described for selection of types of analytical data that represent waste materials that were historically disposed of at the Area I Burn Pit. Although this section only refers to thermal decomposition products, GSU notes that other waste types are being addressed as well (for

example, anions for acids). Section 3.5.2: Please note that soil detection limits and reporting limits should be utilized at sufficiently low levels in anticipation of compliance with the requirements of SB990 (see General Comment No. 9). The reporting limits of PCBs in soil using method 8082 (see Table 3-2a) may likely need to be lowered. The method detection limits and reporting limits for radioisotopes in soil will likely need to comply with SB990 requirements (see General Comment No. 9).

7. **Appendix A, Health and Safety Plan:** DTSC's Industrial Hygiene and Safety Branch (IHSB) reviewed the Health and Safety Plan, and provided comments in a memorandum dated March 17, 2008 (see attached). GSU recommends that the Work Plan be revised to address IHSB's comments.

8. **Appendix A, Radiological Characterization Procedure:** At the request of DTSC, Boeing revised this section after consultation with the California Department of Health Services. The updated radiological characterization procedure is included as Appendix G in the Work Plan Addendum. This section in Appendix A of the Work Plan should be replaced with Appendix G from the Work Plan Addendum.

   Public comments have stressed the need to characterize the Area I Burn Pit for radioisotopes, based on information and uncertainties regarding past operations. For example, public comments have noted the historical disposal of cesium at the Burn Pit area. The disposal logs do not specify if the cesium disposed of at the Burn Pit was a radioisotope. In addition, other chemicals were historically brought to the Area I Burn Pit from SSFL's Area IV. Although no specific references to actual radioactive waste were identified in during review of the historical documents, questions regarding the potential for historical disposal of radioactive materials at the Area I Burn Pit remain. GSU notes that the updated scope of work for the radioisotope characterization will provide extensive screening and characterization data to address these uncertainties.

9. **Appendix A, Air Dispersion Sampling Memorandum:** At the request of DTSC, Boeing revised this section after consultation with the California Air Resources Board (see General Comment No. 8). The updated section describing the proposed air modeling is included as Appendix H of the Work Plan Addendum. This section in Appendix A should be revised to incorporate the updated scope of work. It should also address the Air Board's comments, dated May 21, 2008 (attached).

   Public comments have stressed the need to adequately characterize nature and extent of the air dispersion resulting from decades of historical operations at the

Burn Pit area. A comprehensive suite of analytes will be used during the investigation. These analytes were selected based on knowledge of previous wastes disposed of in the Burn Pit area. The list of analyses is conservatively extensive, to address the inherent uncertainties associated with decades of burning activities. Results from this comprehensive investigation will aid in understanding the nature of the type of contaminants present.

To better understand air dispersion of contaminants associated with historical operations at the Burn Pit area, an agency-approved air dispersion model will be utilized. The model will use on-site meteorological data, with the wind direction data adjusted for the influence of terrain at the burn pit area. The results of the air modeling will be used to support the selected distances for sampling from the Burn Pit area outward.

10. **Potential Historical Debris from 1963 Burn Pit Modifications:** One of the historical documents provided in Appendix C of the Work Plan appears to be a design drawing for modifications of the Burn Pit. On the drawing, instructions are provided that require stripping of the top surface of contaminated soil, with disposal of the soil at a location specified by a North American representative within one-half mile from the Burn Pit area. The location of this material, if generated, is unknown at this time. Boeing is addressing this issue as part of the Group 1B and Group 10 RFI investigations. These larger investigations include area-wide detailed debris surveys as well as extensive investigation of the areas adjacent to the Area I Burn Pit. Examples of how the RFI program deals with issues such as this include extensive review of historical aerial photographs and site photos, logs, mapping of excavation, fill, and debris areas, and sampling of disturbed soil and debris areas. Results from these investigations will be presented in the subsequent Group 1B and Group 10 RFI reports.

11. **Other General Public Comments:**
    Department of Energy activities: One public comment stated that since the Department of Energy historically operated in the Bowl area, the Area I Burn Pit should undergo a radiological investigation. GSU notes that the updated Radiological Characterization Procedures will address radiological screening and characterization of the Area I Burn Pit area.

    Need to address all exposure pathways: Public comments indicate the need to address all exposure pathways. GSU believes that the scope of work presented in the Work Plan and its Addendum adequately addresses the contaminant migration pathways for environmental media. Please note that the surficial media results from this work will be reviewed to determine if additional groundwater

monitoring activities will be required under the Chatsworth Formation groundwater investigation program.

Use of the term "redacted" in the Work Plan Addendum: One commenter noted that Section 2 of the Work Plan Addendum stated that it "redacted" information that was requested by DTSC from Boeing in order to support the work plan's objectives. Based on use of this term, the reader questioned if other documents were being withheld. The term "redacted" as it was used in this section probably would make more sense of it were replaced with the term "excerpted". All issues raised by GSU during the February 29, 2008 meeting to discuss the Area I Burn Pit scope of work are accurately summarized in Section 2, and appear to be directly "excerpted" from GSU's email summary of issues. GSU recommends that the Work Plan provide clarify use of the term "redacted" wherever it is used in the Work Plan and Addendum.

Thank you for the opportunity to comment on this document. If you have any questions or require clarification, please feel free to contact me at (714) 484-5434.

Peer reviewed by: Thomas Seckington, C.HG.
Senior Engineering Geologist
Geological Services Unit
Geology and Remediation Engineering