



# 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 16, 2009

William Preston Bowling  
Founder/Director  
Aerospace Cancer Museum of Education  
23350 Lake Manor Drive  
Chatsworth, CA 91311

**RESPONSE TO COMMENTS ON THE NO FURTHER ACTION DECISION FOR  
RADIOACTIVITY ANALYSES IN GROUNDWATER AT THE CORPORATE POINTE AT  
WEST HILLS – RAYTHEON COMPANY (FORMER HUGHES MISSILE SYSTEMS  
COMPANY), 8433 FALLBROOK AVENUE, CANOGA PARK, CALIFORNIA 91304  
(SCP NO. 0693, SITE ID NO. 2043T00)**

Dear Mr. Bowling:

Los Angeles Regional Water Quality Control Board (Regional Board) staff have reviewed your letter dated November 2, 2009, providing Aerospace Cancer Museum of Education's (ACME) comments on the Regional Board's No further action (NFA) decision for radioactivity analyses in groundwater at the Corporate Pointe at West Hills (CPWH). Your comments relate to the CPWH, also known as the former Raytheon facility (former Hughes Missile Systems Company) site.

Based on our review of the information provided in your letter, we are providing the following response to your comments for clarification purposes:

**1. Lack of Firm Evidence for Off-site Migration of Man-made Sources**

Based on review of the submitted information and available documentation indicated in your letter, there is no evidence or analytical data to demonstrate that radioactively impacted groundwater migrated from upgradient, off-site, man-made sources. However, if new information indicates that the radioactive contamination found in groundwater beneath the former Raytheon facility resulted from off-site, man-made radioactive sources, appropriate actions will be taken. The Regional Board will contact and coordinate with the lead agency, which has jurisdiction to address environmental contamination and has responsibility for regulatory oversight, for further groundwater investigation and remediation at the suspected off-site, man-made source facility to protect human health and groundwater resource.

Please contact the lead agency for further information regarding assessment, monitoring, and remediation activities at and in the vicinity of your suspected off-site source facility.

**2. Disclosure of Historical Radioactive Use at the Former Raytheon Facility**

Based on the information provided by Raytheon, "use of radiological material at the site was limited to sealed source instruments used for x-ray testing, measuring the thicknesses of metals in

***California Environmental Protection Agency***



Recycled Paper

*Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.*

December 16, 2009

circuit boards, and for leak detection purposes. Each instrument contained minute amounts of radiological material and all use, maintenance, and disposal of these instruments were done in accordance with applicable State laws and manufacturer specifications." Therefore, there are no suspected releases of radioisotopes from Raytheon's historical operations at the site. In addition, the groundwater sampling results from October 1991, December 1991, and May 2009 strongly support the statement that naturally occurring uranium has been encountered in groundwater beneath the site.

### **3. No Current Exposure Pathways to Radioactively Impacted Groundwater beneath the Site**

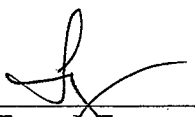
There are three main exposure pathways for radiation, including inhalation, ingestion, and direct exposure. Shallow groundwater has been encountered at depths ranging from 10 feet to 65 feet below ground surface at the site. The radioactive impacted groundwater beneath the site is covered with a concrete or asphalt surface layer and at least 10 feet of unsaturated soil, which provides adequate shielding from ionizing radiation. According to the information provided by Trammell Crow Company (the site property development firm), shallow groundwater beneath the site is not a current water supply source to the site occupants, and on-site water use is supplied by the Los Angeles Department of Water and Power. Based on the evaluation of site characteristics, the Regional Board considers that all three exposure pathways to radionuclides in groundwater at the former Raytheon facility are not complete at this time.

In addition, it is our understanding that there is no groundwater production well within an approximately two-mile radius from the site at this time. If production wells are installed at the site or within the vicinity of the site in the future, the Regional Board believes that the water quality data for radionuclides will be reviewed by the California Department of Public Health (CDPH), which regulates and monitors public water systems. In order to assure that drinking water supplies are in compliance with the California Maximum Contaminant Levels (MCLs), the CDPH has the authority to require the water suppliers to treat the radioactively impacted groundwater before supplying it for public use.

Following further evaluation of site-related information, the Regional Board stands by the previous determination that no further action for radioactivity analyses in groundwater is required at the former Raytheon facility at this time.

If you have additional questions related to groundwater investigation and remediation at the former Raytheon site, please contact Dr. Ann Chang at (213) 620-6070.

Sincerely,

  
Tracy J. Egoscue  
Executive Officer

cc: See next page

***California Environmental Protection Agency***



Recycled Paper

*Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.*

William Preston Bowling  
Aerospace Cancer Museum of Education

- 3 -

December 16, 2009

cc: Mr. Daniel S. Samorano, Raytheon Company  
Mr. Stefan Cajina, California Department of Public Health  
Mr. Chris Nagler, Watermaster, California Department of Water Resources  
Mr. Bernard Franklin, Los Angeles County, Department of Public Health  
Mr. Hoover Ng, Water Replenishment District- Southern California  
Mr. Rod Collins, Department of Toxic Substances Control  
Mr. Jacques Marcillac, Oneida Total Integrated Enterprises  
Mr. Kenneth Katich, Trammell Crow Company  
Ms. Christina Walsh, Cleanuprocketdyne.org  
Ms. Bonnie Klea  
Ms. Chris Rowe  
Mr. Daniel Wiseman

***California Environmental Protection Agency***



*Recycled Paper*

*Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.*