



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Agency 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

August 13, 2009

Mr. Thomas D. Gallacher Director, SSFL – Environment, Health & Safety
The Boeing Company
Santa Susana Field Laboratory
5800 Woolsey Canyon Road
Canoga Park, CA 91304-1148

**COMMENTS ON SOIL MANAGEMENT PLAN FOR INTERIM SOURCE REMOVAL ACTION
SUBMITTED IN RESPONSE TO A CALIFORNIA WATER CODE SECTION 13304 ORDER –
THE BOEING COMPANY, SANTA SUSANA FIELD LABORATORY, CANOGA PARK, CA
(NPDES NO. CA0001309, CI NO. 6027, SCP NO. 1111, SITE ID NO. 2040109)**

Dear Mr. Gallacher:

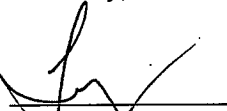
Los Angeles Regional Water Quality Control Board (Regional Board) staff have reviewed the July 10, 2009, *Soil Management Plan* (SMP) submitted in response to a California Water Code Section 13304 Order dated December 3, 2008.

The Boeing Company does not believe that radioactively contaminated soil will be encountered during excavation in the watersheds of Outfalls 008 and 009 as part of Interim Source Removal Actions. However, because of the history of nuclear research and known releases of radioactive material at the Santa Susana Field Laboratory the Regional Board requests that you provide additional information on the disposal of radioactively contaminated soil, if any is encountered.

The SMP indicates that contaminated soil may be disposed of at Antelope Valley, McKittrick, Buttonwillow, and Kettleman City landfills. It is the Regional Board's understanding that these facilities will not accept radioactively contaminated material, including soil with low levels of radiation contamination. Please inform the Regional Board regarding the disposal option in the event radioactive soil is encountered. In addition, the Regional Board received comments from the Department of Toxic Substances Control regarding the SMP (attached) and Ventura County (forwarded via e-mail).

Please provide the Regional Board with your responses to all comments no later than **August 18, 2009**. The responses may be made in an addendum to the SMP or as a modification of the SMP. **Please telephone Mr. Peter Raftery at (213) 576-6724 or email him at praftery@waterboards.ca.gov if you have any questions.**

Sincerely,



Tracy J. Egoscue
Executive Officer

Attachment: DTSC comment letter dated August 3, 2009

cc list next page

California Environmental Protection Agency

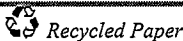


Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

cc: Honorable Alex Padilla, Senator 20th District
Honorable Fran Pavley, Senator, 23rd District
Honorable Tony Strickland, Senator 19th District
Assemblymember Bob Blumenfield, Assemblymember 40th District Assembly
Assemblymember Pedro Nava, Assemblymember 35th District
Assemblymember Audra Strickland, Assemblymember 37th District
Mr. Jarrod Degonia, c/o Assemblymember Cameron Smyth
Ms. Rondi Guthrie, c/o Assemblywoman Audra Strickland
Ms. Samantha Stevens, c/o Assemblymember Bob Blumenfield
Mr. Aron Miller, c/o Senator Fran Pavley
Ms. Linda Parks, Ventura County Board of Supervisors
Mr. Damon Wing, c/o Ms. Linda Parks, Ventura County Board of Supervisors
Mr. Gerard Abrams, Department of Toxic Substances Control, Sacramento
Mr. David Beckman, National Resources Defense Council
Ms. Lori Blair, Boeing
Mr. William Bowling
Mr. Michael Bubman, c/o Bell Creek Homeowners Association
Ms. Jeannie Chari
Mr. Paul Costa, Boeing
Mr. Craig Cooper, Environmental Protection Agency, Region 9
Mr. Daniel Cooper, Lawyers for Clean Water
Mr. David Cooper, Environmental Protection Agency, Region 9
Ms. Elizabeth Crawford
Ms. Nicole Doner, Ventura County Planning Division
Ms. Ginn Doose
Mr. Allen Elliott, National Aeronautics and Space Administration
Mr. John Farrow, M. R. Wolfe & Associates, P.C.
Ms. Merrilee Fellows, National Aeronautics and Space Administration
Mr. Tom Ford, Santa Monica Bay Keeper
Dr. Mark Gold, Heal the Bay
Mr. A. J. Greenstein
Mr. Matt Hagemann, Soil/Water/Air Protection Enterprise
Ms. Carol Henderson, Office Manager, Bell Canyon Homeowners Association
Mr. Dan Hirsch, Committee to Bridge the Gap
Ms. Heather L. Hoecherl Esq., Director of Science and Policy, Heal the Bay
Mr. Philip Isorena, State Water Resources Control Board, Division of Water Quality
Ms. Kirsten James, MESM, Staff Scientist, Heal the Bay
Ms. Stephanie Jennings, United States Department of Energy
Ms. Barbara Johnson, Susana Knolls Homeowners, Inc.
Dr. Michael Josselyn, WRA, Inc.
Mr. Thomas Johnson, ETEC Project Manager, United States Department of Energy
Ms. Teresa Jordan
Mr. Thomas Kelly, Environmental Protection Agency, Region 9, (WTR-5)
Dr. Jae Kim, Tetra Tech

cc list continues on next page

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cc list continued

Mr. Buck King Department of Toxic Substances Control, Sacramento
Ms. Bonnie Klea
Mr. Wayne Lee
Mr. Michael Levy, State Water Resources Control Board, Office of Chief Counsel
Mr. Michael Lopez, U.S. Department of Energy, Oakland
Mr. John Luker
Ms. Carissa Marsh, The Simi Valley Acorn
Ms. Marie Mason
Mr. Daniel Maccabee, Brandeis-Bardin Institute
Mr. Nicole Moutoux, Environmental Protection Agency, Region 9
Mr. Jerry Murphy, c/o Bell Creek Homeowners Association
Mr. Jim Pappas, Department of Toxic Substances Control, Sacramento
Mr. William Paznokas, Department Of Fish and Game, Region 5
Mr. Sheldon Plotkin, Southern California Federation of Scientists'
Ms. Bunny Raskin
Mr. Norm Riley, Department of Toxic, Substances Control, Sacramento
Ms. Chris Rowe
Ms. Sharon Rubalcava, Weston, Benshoof, Rochefort, Rubalcava, MacCuish, LLP
Ms. Darlene Ruiz, Hunter Ruiz Research, Consulting and Advocacy
Mr. Adam Salkin
Mr. Mathew Sanders, Paul, Hastings, Janofsky & Walker LLP
Ms. Lorraine Scott
Mr. Joseph Smith, Department of Toxic Substances Control, Office of Legal Counsel
Sacramento
Dr. Michael Stenstrom, SSFL Stormwater Expert Panel
Ms. Rebecca Tadesse, Branch Chief of Materials Decommissioning, U.S. Nuclear Regulatory
Commission
Ms. Stephanie Trotter, State Water Resources Control Board
Mr. Rick Verguitz, Water & Environmental Resources Section, Ventura County Watershed
Protection District
Mr. Mati Waiya, Wishtoyo Foundation
Mr. Jack M. Wallace
Ms. Christina Walsh
Ms. Marge Weems
Ms. Darla Weiss, Ventura County Watershed Protection District
Ms. Mary Wiesbrock
Dr. Daniel Wiseman, West Hills Neighborhood Council-Santa Monica Mountains Area
Committee
Mr. Anthony Zepeda
Mr. Cybil Zeppieri
Mr. Lori Zinkan
Ms. Elizabeth Zlotnik

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cc list continued

California Coastal Commission, South Coast District
California State University, Northridge
City Manager, City of Simi Valley
City of Los Angeles, Bureau of Engineering, Wastewater Systems Engineering Division
Department of Health Services, Public Water Supply Branch
Department of Interior, U.S. Fish and Wildlife Service
Environmental Protection Agency, Region 9, Office of Radiation Programs
Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Friends of the Los Angeles River
Los Angeles and San Gabriel Rivers Watershed Council
Los Angeles County, Department of Health Services
Los Angeles County, Department of Public Works, Environmental Programs Division
Masry & Vititoe Law Offices
NOAA, National Marine Fisheries Service
Simi Valley Library
The Boeing Company Santa Susana Field Laboratory
U.S. Army Corps of Engineers
ULARA Watermaster
Ventura County Air Pollution Control District
Ventura County Environmental Health Division
Ventura County Public Works
Water Replenishment District of Southern California

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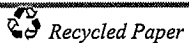
Mr. Thomas D. Gallacher
The Boeing Company

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August 13, 2009

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