

In reply refer to:  
10215/dss/9882

September 20, 2010

Ms. Rebecca Chou, Ph.D., P.E.  
Section Chief of Groundwater Permitting and Land Disposal  
California Regional Water Quality Control Board- Los Angeles Region  
320 W. 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Subject: Response to LARWQCB Notice of Non-Compliance WDR 95-012,  
CI 7483 Dated August 18, 2010

Dear Dr. Chou,

Raytheon has reviewed the LARWQCB letter dated August 18, 2010 entitled Notice of Non-Compliance – Former Hughes Missile Systems Company, 8433 Fallbrook Avenue, Canoga Park, California (Order No. 95-012, CI-7483), and would like to offer the following clarifications pertaining to the perceived non-compliance for the reporting dates.

Per the attached August 26, 1997 letter from the LARWQCB's Dennis Dickerson to Martin Barackman of Hughes Missile Systems Company, reference to Item T-1, Item 1 on the first page (fourth indented paragraph), it reads,

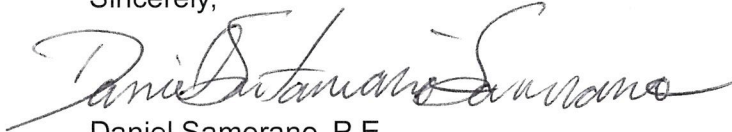
“We approve your request to change the reporting requirements from quarterly to semi-annually as reporting periods run from October 1 through March 31 and April through September 30. Reports will be due 30 days after the reporting period.”

Therefore, all reporting post August 1997 were due on either April 30th or October 30th for all monitoring performed between the preceding October through March and for the preceding April through September, respectively. The information provided in the recent correspondence dated August 18, 2010 is not consistent with the LARWQCB correspondence from August 27, 1997. Furthermore, enclosed are the cover sheets from the Q4 1998 and Q2 1999 reports dated February 20, 1999 and August 20, 1999, respectively.

Using the submittal dates approved by the RWQCB August 26, 1997 correspondence, the table on page 1 would reflect one report submitted four days past the due date. This report, the 2006 Annual report, was late due to a mailing error on the part of our consultant, however, with the advent of Geotracker, these issues should be avoided in the future.

Raytheon would like to re-iterate that it has maintained compliance with all the substantive sampling requirements for more than 15 years of monitoring and remains committed to site clean-up and compliance objectives at the Former Canoga Park Site. Raytheon requests the LARWQCB reissue the August 18, 2010 correspondence to correct the inaccuracies. Please feel free to contact me should you have any questions or to discuss this matter.

Sincerely,



Daniel Samorano, P.E.  
Remediation Project Manager

Distribution:

(E-mail Copy)

Ms. Sutida Bergquist, CA Department of Public Health  
Mr. Chris Nagler, Watermaster, CA 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  
Mr. William Preston Bowling, Aerospace Cancer Museum and Education  
Ms. Christina Walsh, Cleanuprocketdyne.org  
Ms. Bonnie Klea  
Ms. Chris Rowe  
Mr. Daniel Wiseman  
Mr. HYTE Johnson, Raytheon  
Ms. Carmen Marriott, Raytheon  
Canoga Park Water Board File

**AUGUST 26, 1997 LARWQCB LETTER**



**Cal/EPA**

Los Angeles  
Regional Water  
Quality Control  
Board

101 Centre Plaza Drive  
Monterey Park, CA  
91754-2156  
(213) 266-7500  
FAX (213) 266-7600

August 26, 1997

Mr. Martin L. Barackman  
Senior Hydrologist  
Hughes Missile Systems Company  
P.O.Box 11337, Building 826  
Tucson, AZ 85734-1337



Pete Wilson  
Governor

REQUEST TO CHANGE MONITORING AND SAMPLING REQUIREMENTS FOR WASTE DISCHARGE REQUIREMENTS ORDER NO. 95-012, HUGHES MISSILE SYSTEMS COMPANY - 8433 FALLBROOK AVENUE, CANOGA PARK (FILE NO. 94-045)

We have received and reviewed your letter dated September 17, 1996, and the addendum report dated April 10, 1997, and July 28, 1997, in which you requested a reduction in the frequency of analysis for the constituents of concern along with a few other modifications to the subject Order No. 95-012. Based on the information provided and our review of the monitoring reports for past two years, the following are our comments:

**Page 1:** The contaminants of concern at this site are those listed on page 3, Item A2 of the Order.

**page 3, Item A2:** Boron is listed in the Basin Plan for the San Fernando Groundwater Basin. Therefore, we cannot remove it from the requirements at this time. However, we will reduce the frequency of analysis from quarterly to annually.

**Page 4, Item A8:** The last paragraph of the sentence; "... only on property owned and controlled by the discharger." cannot be removed at this time. You must notify this Regional Board in writing of any changes in the ownership with full disclosure of the on-going remediation activities to the new owner.

**Page T-1, Item 1:** We approve your request to change the reporting requirements from quarterly to semi-annually as reporting periods run from October 1 through March 31 and April through September 30. Reports will be due 30 days after the reporting period ends.

**Page T-2, Item 3g:** We approve your request to monitor groundwater elevation quarterly.

Mr. Barackman  
Page 2

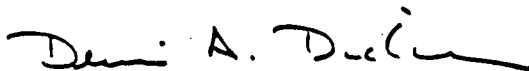
**Page T-4, Effluent Monitoring:**

- a. Some of the constituent in the Monitoring and Reporting program, such as oil and grease, suspended solids, settleable solids, ethylene dibromide, acetone and methyl ethyl ketone have been historically below the detection limit and therefore are no longer required to be monitored. We reduce the sampling frequency from quarterly to annually for the following constituents: total lead, boron, and total petroleum hydrocarbons. Analyses of these constituents must be submitted with your annual report.
- b. EPA Testing Methods 8010/8020 or Method 8260 may be used for VOC analyses.
- c. Reduce the effluent sampling frequency for the constituents of concern from monthly to quarterly.

**Page T-5, Groundwater Monitoring:**

- a. Change groundwater sampling frequency from quarterly to semi-annually.
- b. Following modifications are to be added: Water sampling may be conducted in 10 monitoring wells located upgradient, downgradient and crossgradient of the dissolved plume. These wells are identified as CM-7D, CM-8D, CM-10, CM-12, CM-16, MW-15, MW-16, MW-9S, MW-19D, and, MW-20S. On an annual basis, the seventeen groundwater recovery wells, and the remaining on-site monitoring wells are to be purged, sampled and analyzed for VOCs by EPA Method 8010/8020 or Method 8260.

If you have any questions, please contact Jim Ross, chief of our Site Cleanup Unit, at (213)266-7550.



DENNIS A. DICKERSON  
Executive Officer

cc: John Youngermen, Division of Water Quality, SWRCB  
Jorge Leon, Office of Chief Counsel, SWRCB  
Martin Kappeyne, Flour Daniel GTI, Inc.  
Jack Petralia, Los Angeles County Department of Health Services  
Gary Yamamoto, State department of Health services



**1998 AND 1999 GROUNDWATER MONITORING  
REPORT COVERS**



MC

94-45-9-111-2  
LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

**GROUNDWATER AND  
REMEDATION SYSTEM MONITORING  
1998 FOURTH QUARTER REPORT  
OCTOBER THROUGH DECEMBER  
AND 1998 ANNUAL SUMMARY  
RAYTHEON MISSILE SYSTEMS COMPANY  
FORMER HUGHES FACILITY  
8433 FALLBROOK AVENUE  
CANOGA PARK, CALIFORNIA**

IT Corporation Project 102599

February 20, 1999

Los Angeles Regional Water Quality Control Board File No. 94-45  
Waste Discharge Requirement Permit No. 95-012  
Monitoring & Reporting Program No. 7483

Prepared for:  
Ms. Manjulika Chakrabarti  
Technical Support Unit  
**Los Angeles Regional Water Quality Control Board**  
101 Centre Plaza Drive  
Monterey Park, California 91754

**IT Corporation**  
Submitted by:

Kevin L. McIlvenna  
Staff Environmental Scientist

**IT Corporation**  
Approved by:

Daniel L. Grasmick, P.E.  
Certificate No. CH4717

**GROUNDWATER AND REMEDIATION  
SYSTEM MONITORING  
1999 SECOND QUARTER, APRIL THROUGH JUNE  
AND  
1999 SEMIANNUAL REPORT, JANUARY THROUGH JUNE**

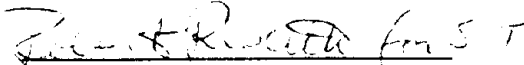
**RAYTHEON SYSTEMS COMPANY  
FORMER HUGHES FACILITY  
8433 FALLBROOK AVENUE  
CANOGA PARK, CALIFORNIA**

**IT Corporation Project 781198  
August 20, 1999**

**Los Angeles Regional Water Quality Control Board File No. 94-45  
Waste Discharge Requirement Permit No. 95-012  
Monitoring and Reporting Program No. 7483**

**Prepared for:  
Ms. Manjulika Chakrabarti  
Technical Support Unit  
Los Angeles Regional Water Quality Control Board  
101 Centre Plaza Drive  
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Submitted by:

  
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