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In reply, refer to:
11105/dss/9739

May 19, 2008

Certified Mail – 7005 1820 0001 7061

James M. Pappas
Unit Chief
Northern California Permitting and Corrective Action Division
California Department of Toxic Substances (DTSC)
8800 Cal Center Drive
Sacramento, California 95826-3200

Subject: RCRA Facility Assessment (RFA) Questionnaire Request
Former Canoga Park Facility, 8433 Fallbrook Avenue, Canoga Park, CA

Dear Mr. Pappas:

Raytheon Company (Raytheon) is responding to the DTSC's request for a RFA Questionnaire for the Former Canoga Park Facility. The letter dated February 11, 2008 requested the following information:

- 1) Completed RCRA Facility Assessment Questionnaire
- 2) A current assessor's plat showing how the property is divided and the identities and addresses of each owner as shown on current deeds
- 3) A copy of the sales agreement for the original property transfer
- 4) Disclosure of historical radioactive use at the facility; and
- 5) Two hard copy sets and an electronic copy set of the entire project file

It should be noted that on February 4, 2008 Raytheon received DTSC's RFA dated January 30, 2008 (2008 RFA) which appears to be in final form.

Raytheon is complying with these requests by providing the information summarized in the subsequent sections of this letter and supported by the attachments to this letter. The 2008 RFA for Former Canoga Park Facility has been completed without consideration for all available data, including that which the DTSC has requested. It is Raytheon's understanding that the information provided will be used to revise the 2008 RFA and that there will be opportunity to provide comment on the revised document.

1) Completed RCRA Facility Assessment Questionnaire

The completed questionnaire is provided in Attachment 1. Much of the information provided in the questionnaire references a series of summary tables that have been prepared for each of the listed AOCs/SWMUs. In reviewing the 2008 RFA, the numbering system and description for several of the AOCs/SWMUs has changed from the DTSC's June 5, 1997 letter (Attachment 1) AOC/SWMU identification numbers (see Cross Reference Table in Attachment 1). For ease of reference, we have listed both ID's in the summary tables. Due to the already complex nature of the facility, Raytheon requests that the RFA document be revised to be consistent with the historical designations to minimize confusion. It would be helpful if the DTSC would explain the inconsistencies between the two designations.

Reference information for the AOCs/SWMUs is organized into three packages, designated as Zone 1, Zone 2, and Zone 3, in accordance with the 2008 RFA (see Figure 1). This was done for several reasons; (1) to be consistent with the 2008 RFA, (2) for ease of reference, (3) to allow the DTSC to prioritize and expedite a response to Zones 2 and 3 based on the provided data, and (4) to support the current property owner's land use plans for development. The associated AOCs/SWMUs for each of these zones have been adequately characterized, and pose no threat to human health and the environment, especially in regards to shallow soils that may be disturbed during grading activities in Zones 2 and 3.

A table with a description of each AOC/SWMU, its associated reports, summaries of environmental investigations and remediation, current status, and recommendations is provided for each of the AOCs and SWMUs referenced in the DTSC's 2008 RFA. These tables are provided in Attachment 1 as follows: Tables 1A through 1G (Zone 1), Tables 2A through 2I (Zone 2), and Tables 3A through 3C (Zone 3). In addition to the environmental summary tables, historical use tables for the site are also provided (Tables 4 through 7). A table "set" for each zone was prepared and the pertinent information for each zone was highlighted.

The 2008 RFA also lists two new AOCs; AOC-12 (Storm Sewer) and AOC-13 (Northeast Plume). The reference to the storm sewer is unclear. The storm sewer system was not designated an AOC in 1997 and therefore is not addressed. The 2008 RFA designation of AOC-13, referring to the well CM-08D area seems to be premature as there are several other AOCs that are listed as being associated with the concentrations detected in well CM-08D.

The historical environmental features listed in Zones 2 and 3 as well as any other past historical uses should not impede future development activities for the southern portion of the site, namely the DeVry Assessors Parcel Number (APN) 2005-002-011 and the southwest portion of parcel 2005-02-009 (Figure 1). This is consistent with a July 27, 1998 DTSC letter (Attachment 1) from Phillip Chandler of the DTSC to Mr. Ken Rutkowski of DeVry, which determined that no releases had occurred in the DeVry property and that no further characterization or remediation was warranted. Furthermore, in a letter dated January 26, 2007 (Attachment 1) the Los Angeles Regional Water Quality Control Board (LARWQCB) approved the discontinuation for monitoring of wells in the southern parcels as no concentrations above a California Maximum Contaminant Level (MCL) has been detected since 1999 (see Figure 2). A topographic map of the site is provided as Figure 3 for general reference.

2) Submittal of a current assessor's plat showing how the property is divided and the identities and addresses of each owner as shown on current deeds

Please find the attached Figure 1 and Table APN (Attachment 2), illustrating and summarizing each of the parcels and property owner information. For reference, copies of the actual assessor's parcel maps are also provided (Attachment 2). All information was obtained from the City of Los Angeles Assessor's office: <http://assessor.lacounty.gov/extranet/default.aspx>.

3) Submittal of a copy of the sales agreement for the original property transfer

The sales agreement for the original property transfer is business confidential. The key provisions of interest required Raytheon to assume responsibility for releases known at the time the sales agreement was executed. The sales agreement was executed May 15, 1995. A copy of Exhibit L, which defines the known releases of the sales agreement, is enclosed as Attachment 3.

4) Disclosure of historical radioactive use at the facility

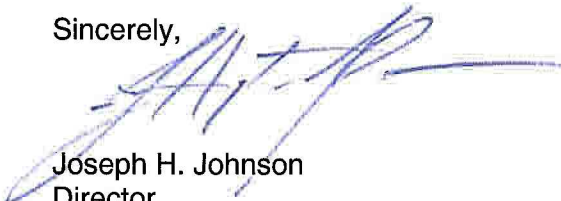
Data on the use of radiological material and its occurrence in groundwater at the Former Canoga Park Facility has been recently requested by the LARWQCB in a letter dated March 19, 2008. The data transmittal dated April 30, 2008 provided to the LARWQCB is included as Attachment 4 and provides the DTSC requested information. In summary, use of radiological material at the site was limited to sealed source instruments used for x-ray testing, measuring the thicknesses of metals in 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. Several studies have been performed at the site and each have concluded that the levels are consistent with naturally occurring earth materials.

5) Submittal of two hard copy sets and an electronic copy set of the entire project file

Hard copies of all the environmental reports produced for this project have been provided to the DTSC since direct involvement began 19 years ago. In an attempt to satisfy this most recent request, we have provided electronic copy of designated records in .pdf format (Attachment 5). If there is a specific copy the DTSC requires in hard copy, please let us know. All attachments are provided on compact disc.

In summary, Raytheon is committed to the clean-up and closure of the site as it has been performing onsite clean-up activities continuously since 1995. We look forward to working with new DTSC project management to advance the closure process and resolve the AOCs/SWMUs in Zones 2 and 3. Should the DTSC have questions, Raytheon would be pleased to respond, either in writing or at a meeting. Please feel to contact Mr. Daniel Samorano of my staff at (520) 794-9026 with any questions.

Sincerely,



Joseph H. Johnson
Director
Environmental Health and Safety

Attachments: Compact Disc

Figure 1 - Canoga DTSC Figure

Figure 2 - Site Plan Showing Selected Volatile Organic Compounds versus Time in
Groundwater

Figure 3 - Site Topography

Attachment 1: RFA Questionnaire

June 5, 1997 DTSC Letter

Cross Reference Table

Zone 1 Tables

Zone 2 Tables

Zone 3 Tables

July 27, 1998 DTSC Letter

January 26, 2007 LARWQCB Letter

Attachment 2: Table APN

Parcel Map- North portion of Site

Parcel Map- South portion of Site

Attachment 3: Exhibit L

Attachment 4: LARWQCB Reponse on Radioactivity Conditions

Attachment 5: Designated Records

Copy: Martin Herrmann, DTSC (w/ Attachments)

Neil Holdridge, Trammell Crow (w/ Attachments)

Carmen Marriott, Raytheon (w/o Attachments)

Daniel Samorano, Raytheon (w/o Attachments)

Jacques Marcillac, TN&A (w/o Attachments)

Project File: Canoga Park DTSC Correspondence (w/ Attachments)