

April 2, 2009
Executive Officer
Ms. Tracy Egoscue
Los Angeles Regional Quality Control Board
320 4th Street, Suite 200
Los Angeles California
90013
Fax no. 213/ 576-6640

2009 APR 17 PM 2:01
LOS ANGELES REGIONAL WATER BOARD
QUALITY CONTROL BOARD

RE: The Ventura County Wide Ms4 Tentative NPEDS

Dear Ms. Egoscue,

I am of the opinion that The Los Angeles Regional Water Boards non-compliance is due in large part to Cities and Counties adopted Water programs -through the State -aren't following the States guidelines for; (1) Drinking Water purification, and or (2) enforcement of keeping contaminates from entering the water bodies of the State.

- . How as residents of Ventura County can we bring compliance to California, without sacrificing further delays and expenses?
- . How do we get back on track enforcing Statues, Laws and State Water Regulations, when there is such wide spread "non-compliance" throughout the State more specificity Ventura County ?
- . But more to the point; how has the non-compliance been allowed to reach such proportions?

As a layperson it would appear to me that besides the obvious; (1) The Los Angeles Water Boards being under staffed, (2) and or unequipped to require or carry out enforce compliance when a violation does occur, would be the fact that I see no follow through. It's not that Statues, Laws and Regulation aren't on the books, it's that there is no continuity between action and the consequence. I've personally been involved reporting the noncompliance since 1988, watching as Cities and Counties dictate policy to the State and Federal Government.

When the laws and Statues enacted to protect the resident of California's drinking water are sidestepped in order to keep the defense industry humming, while the private corporations get rich someone has dropped the ball. Clearly, I don't advocate that the Los Angeles Regional Water Board is facing an easy task. What I am saying is that it's time to take back the Los Angeles Regional Water Board from the bureaucrats, and start enforcing the States "**Clean Water Act**".

When are you going to stop dragging your feet? Tell me how many citizens have to die from cancer before the laws are enforced?

Sincerely

cc; State Water Resources Board

Ginn Doose, c/o P.O. box 2310, Clearlake, CA. 95422

Ginn Doose

June 20, 2007

fax. No. 916/ 341-5284

State Water Resources Control Board
Mr. Jeff Barnickol, and or
Ms. Zori Lozano-Frudrick
1001 I Street
Sacramento, Ca. 95814

Re: The 2007 Strategic Plan Up-Date out reach Work Book

Dear Zori Lozano-frudrick, or Jeff Barnickol,

I've submitted my comments to State Water Resources Control Boards attention the past several months on each of the Work Shops being conducted. I am elated that the SWRCB is becoming more in tune to the publics concerns. Issues that are near and dear to me are addressed in my comments dated ;

- **May 23, 2007**, Water Rights Enforcement Work Shop,
- **June 12, 2007**, Public Work Shop to receive information regarding policy direction on, Water Quality Enforcement.

Other related issues filed in oppositions were:

- **March 6, 2007**, to the WDR for Municipal Storm Water Discharge, (within the Ventura County Water Protection District, ((NPDES)) No. CAS 004).
- **June 11, 2007**, Item 4A and 4D Agenda Summary City Council Ventura County Water Works District No. 8 Simi Valley Community Development Agenda Regular Meeting .

My concerns stem from knowledge of violations with;

- Federal Regulations that protect residents under "Health and Safety".
- Drinking Water contamination
- Taking a more active role in resolving "Noncompliance" by Communities and Cities within the State of California.
- Stronger enforcement of Statues, Laws and Regulations already adopted, and the filing of criminal suites against violators.

A review of the June 14, 2007 Work Shop Up-Date list eight /trends topics that the June 28th Summit Meeting will be addressing. I take personal issue with;

- Changing political reality/greater awareness of the public involvement, and public process.

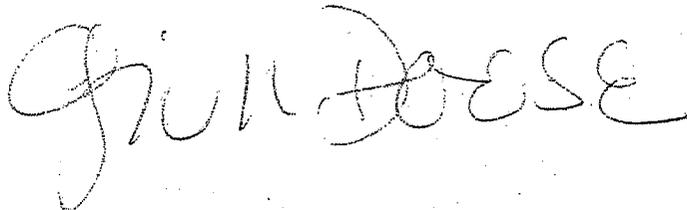
Page 2
June 20, 2007
SWRCB/Doose

- Toxic chemicals /hazard waste in Drinking Water.
- Environmental stress/impact from contaminates on communities. Contaminates influence air, water quality, and caused by potential hazards when not reported to public. If, the Environmental Impact Report's weren't done, or the hazards have been removed from EIR's it placed the public at risk.
An example is;
 - (1) The Rocketdyne Missile Site where no EIR's were ever done for that site even though three melt down took place.
 - (2) Shale from the alluvia debris of the Las Lajas and Chivo's Canyons, and their tributaries impact the down stream waters.
- Riparian Rights/ water being illegally diverted for Cities/Communities own personal gain. The falsifying of Federal and State documents by Cities and Communities to appear in compliance.

Enclosed for your review are the sited comments and opposition.

Sincerely,

Ginn Doose
4922 Alta Street
Simi valley, Ca.
93063
c/o P.O.Box 2310
Clearlake, Ca.
95422



cc; Mr. Dennis White DHS/ IGO fax. 202/ 254-4294
Miss Song Her, Clerk of the Board fax. 916/ 341-5620

August 31, 2007
NPEDS
Attn; Mrs. Cassandra Ownes
Permit Industrial Unit/sect.
Cal. EPA-LARWQCB
Region 4, Suite 200
320 West 4th Street
Los Angeles, California
90013

Fax. No. 213/ 576-6640
Tel. 213/ 576-6600

Copy of hand written
Opposition, (1) faxed 9/4/07
proof, and (2) 8/10/07 filing
To Ms. Rainey, D.T.S.C.P.C.A.U.

RE: The Boeing Company Santa Susana Field Laboratory National Pollution
Discharge Elimination System Permit Amendment (Proposed Order No.
R4-2007-OXXX), and Water Discharge Requirements.

Dear Mrs Ownes,

When I first started to review the documents listed below;

- The Proposed Order R4-2007-OXXX,
- The Fact Sheet,
- The Administration Civil Liberty Complaint, and
- The Consent Order for Corrective Action.

I felt we were off to a good start, making progress of;

Identifying, Addressing, and Containing

the toxic contamination that has spewed carcinogens into the Air and Water Supply for the
Ventura and Los Angeles areas for 57 years now.

I appreciate the efforts that went into assisting the formulation of this order. But in all
honesty, I was hoping to see stronger wording/language. I am of the opinion that some of the
statements are misleading and somewhat contradictory. I refer to;

- "Transported using piping to a Natural Drainage Channel", P. 9 Fact Sheet.
- "Provide a significant portion of the Headwater", P.28 Order/No. R4-2007-OXXX.

Page 2
NPEDS/Proposed Order
Mrs. Ownes /Doose

. "Discharge is located in Arroyo Simi and the sediment contraction at the Arroyo Simi East of Hitch Blvd., or at Simi Valley Water Quality Control Plant should not exceed the interim effluent limitation. Since these facilities are located near the top of the Water Shed, The Discharger may choose to collect sediment samples closer to the facility"
P. 55, of Order No. R4-2007-OXXX.

This statement bothers me, it would appear that the effluent will be piped passed Simi Valley, and dumped the effluent in a down stream Community, still flowing towards the Pacific Ocean.

In other words Boeing isn't changing the amount of effluent discharged, it's just being Dumped in some one else's "back yard" using the **Band Aid** approach. I question if your not testing missals any longer (MWH-2006 Report SSFL Area 6) as of 1992, what is all the effluent from? Remember the Simi Arroyo flows into the Cajaguas Creek than to the down stream Communities.

. "Boeing operation at the SSFL since 1950" Doc. The Consent Order for Correction Action, P. 2, 2nd Pf., 2-3 sentence.

. "DTSC issued Post Closure Permits for Area's I, and III on May 11, 1995. The Post Closure Permit for Area's I, and III was issued to [The Boeing Co. Rocketdyne Pollution And Power]", as owner and operator". The wording tells me that Boeing and Rocketdyne are held by the same Parent Corp. that just appear to be two different no related Corporations, when actually they are one in the same.

. "The Discharge is Storm Water and it is near the top of the Water Shed, the Discharger may utilize the option of Sampling the OC Pesticides and PCB's or Sampling the receiving Water. The Discharger may also choose to join the Cajaguas Creek Water Shed, TSDL Monitoring Program and Monitor at an Established Compliance Sampling location in the Simi Arroyo", P. 28 Fact Sheet.

I'm concerned, I could go on but there are too many items that don't make sense. I've tried to list a few discrepancies that are being over looked. With the on going violations to the Publics Drinking Water for 57 years now, I'm disappointed that the language / wording wasn't "Stronger".

I'm in favor of asking for an investigation by the State Attorney General. Let's take this back to the (State Water) Board and work on making this "Fool-Proof". It's criminal what has taken place here in Los Angeles and Simi Valley. And, Im told that in Washington State near where Boeing has its headquarters there has been reported violations from that plant.
Sincerely,

Ginn Doose, P.O.Box 2310, Clearlake, Ca. 95422



June 12, 2007
State Water resources Control Board
Miss Song Her, Clerk to the Board
1001 I Street, 24th Floor
Sacramento, Ca. 95814
Fax No. 916/ 341-5620

Re; Revised Public Workshop to receive information regarding policy direction on, Water Quality Enforcement. Comments on items 1-6 for discussion in the Workshop, on June 28, 2007, participants comments due on June 14, 2007.

My comments will address items 1-6, detailed suggestions on stronger enforcement tools will be lengthier and more direct.

1. Recommendations on modifications are;

- Adopt stronger wording for all State Water Resource Project/programs, to include the National Flood Insurance Program, (NFIP) within the State of California.
- Enact and enforce legal consequences for violations of; Title 42 U.S.C. sec. 4001-4128 under the Authority of the Executive Order no.12127 issued March 31, 1979 Title 44, CFR, Ch.1 sec.59-77 of the NFIP.

In particular an example would be; "violations of any, or part of the adopted Water Ways/Flood Plains, or Flood Ways SHALL cause litigation to be filed on behalf of the Federal Government, and its citizens, or a citizen of the State who has been harmed or property damaged by the violation". Authority under Title 44 CFR, sec. 60.25 duty of State coordinating agency.

2. Suggestions on factors to consider in prioritizing enforcement would be;

- Any reported violations, and or detected violations of any kind,[no matter how controversy] should be the SWR top priority.
- Enforcement must be your first consideration, under adopted Waters within the State of California.
- Human safety , public loss from damages caused by noncompliance as sighted under; Title 44,CFR, sec 60.3 (a)(2)which speaks directly to the cover-up at the Rocketdyne Missal site, that the City of Simi Valley is and was responsible to monitor as Water Works no. 8 (Previously no. 17) as overseers.
- Enforce Authority under sec. 404 of the Federal Water Pollution Control Act, Amendment of 1972, 33 U.S.C. 1334, and (3) review "ALL" permits to assure site is safe from flooding.

3. Red flags to look for in measuring the effectiveness of the Water Quality Enforcement Program are as follows;

- Report noncompliance, especially incidences that have gone on undetected/covered-up by the Communities/Cities, or State Agencies for their own personal gain.

An example is the Rocketdyne facility/site where the three melt downs weren't made public until; a) the 1959 melt down in October of 2005, b) the 1963, and the 1969 melt downs on April 9, 2007 at the public Rocketdyne meeting in Simi Valley, Ca.

- The State, and or the Federal Government needs to take action filing a criminal suit against the City of Simi Valley, and the owners of the Rocketdyne Missal site, under sec. 404 of the Federal Water Pollution Control Act on behalf of the citizens of the San Fernando Valley and Ventura County. As dictated under Title 44, CFR, Ch.1, sec. 60.3 (a)(2) of the NFIP.

4. Steps to achieving a better informed public, regarding enforcement of Statues and State Water Resources Regulations.

- To set up and utilize a community "Watch Dog", (as we are commonly called), that would be required to attend City Council Meeting, etc., who would be the community voice who would report on information acquired from the public input on proposed projects/ or violations on existing sites.
- Written reports would go directly to the SWRB, regarding violations of Statues, Laws and adopted Regulations.
- Make all Laws, Statues and Adopted Regulations available to the public on line that are germaine /relevant to proposed projects for review. As sited under the E.O. 12127 of March 31, 1979 under Title 44, FR 19367, 3 CFR 1979.

5. Suggestions on becoming a more effective Water Quality Board.

- Stronger enforcement of the adopted Statues, Regulations and Laws on violations, and criminal acts committed against the public.
- File suit on behalf of the citizens of the State/Community who has suffered damages by the noncompliance of the Cities/Communities who have failed to enforce and have dropped the ball in their failure to administer the State Water Recourses and National Flood Insurance programs with the State.
- Take an active role in assisting in resolving the violation.

6. Your NONCOMPLIANCE, is the most "significant inconsistence" of the State Water Resources Board.

- The SWRCB failure to administer and enforce the NFIP, The Clean Water Act, Federal Funded Programs, within the designated flood way/ flood plain etc., for Low Income Residents under the authority of Title 44, and 42 Health and Safety.
- The failure to enforce Housing and Urban Development Act of 1969, approved Dec. 1969, and Title XIII of the Housing and Urban Development Act of 1968, allows noncompliance to fester and develop into further violations.

P. 3

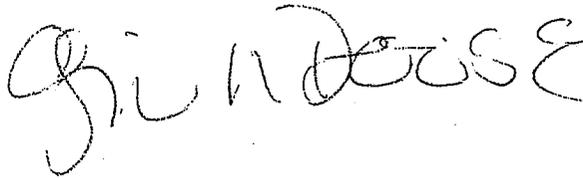
June 12, 2007

SWRCB

P.7, item III entitled, Determining "Priority" Violations states; "all violations subject to mandatory minimum penalties pursuant to California Water Code 13385". Clearly with Statues, Regulations and Laws having been adopted the Rocketdyne fiascos should never have taken place.

The State Water Resources failure to step up to the plate has violated its own Statues, Laws and regulations adopted to prevent Water contamation of its drinking water. Please refer to May 23, 2007 comments, as well as the June 4, 2007 comments regarding Riparian Rights. Attachments enclosed to provide assistance.

Sincerely,

A handwritten signature in black ink that reads "Ginn Doose". The signature is written in a cursive, somewhat stylized font.

Ginn Doose
4922 Alta Street
Simi Valley, Ca.
93063
c/o P.O.Box 2310
Clearlake, Ca.
95422

cc; Mr. Dennis White, IGO DHS/FEMA