

COMMENTS
FOR
BOEING SANTA SUSANA FIELD LABORATORY
TERMINATION OF WASTE DISCHARGE REQUIREMENTS

COMMENTS RECEIVED FROM:

- 1) Ginn Doose (comments dated 5/26/2010)
- 2) Teresa Jordan (comments dated 5/26/2010)
- 3) Chris Rowe, West Hills Neighborhood Council (comments dated 5/28/2010)
- 4) Jacqueline C. Young, (comments received 5/28/2010)
- 5) Chris Rowe, West Hills Neighborhood Council (comments dated 5/31/2010)

Ginn Doose comments, dated 5/26/2010

May 26, 2010

Mr. Doug Cross
L.A. Water Quality Control Board
320 W. 4th Street, suite 200
Los Angeles, CA. 90013
Fax. 213/ 576-6640

RE: Termination of Waste Discharge Requirements-BOA Co. Santa Susana Field Laboratory, Santa Susana CA., (file No. 04-022).

Dear Mr. Cross,

In the document entitled; Termination of Waste Discharge Requirements-BOA Co. Santa Susana Field Laboratory, staff is recommending that order no. R4-204-0112 be approved, stating in their opinion; "there is no longer a discharge and the contaminated soil has been treated, or removed", would you say that is an accurate statement?

If my memory serves me correctly a natural absorbent was used to remove the contaminated soil at the SSFL site. Several questions that come to mind regarding that supposed cleanup are;

- 1 . What happened to the natural absorbent, where did it go, or was it left on the site?
- 2 . How many tons have been removed, and what was the size of the area that has per chloride contamination?
- 3 . How does the tonnage removed to-date relate to the tonnage recommended to be treated and, or removed?
- 4 . What is the percentage of per chloride in that run off? Was that percentage taken into account when the tonnage of contaminated soil was removed?

In the previous comment period for SSFL/BOA's Contamination Waste Discharge I addressed the proposed piping off site. I believe that staff supposed the offsite piping and was confident that piping the discharge to another city was beneficial to cleaning up the SSFL site.

- 5 . What was the response to my concerns of offsite dumping? I have never received any feedback about the dumped site, or the numerous problems I foresee.
- 6 . Does per chloride just dissipate at that point or does that process have to be removed as well?

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May 26, 2010
Mr. Cross/Doose

- 7 . I was likewise concerned about the city where the discharge would be dumped, won't that only create the same set of problems for their residents, who will be faced with the SSFL contamination problems?
- 8 . It has been reported that the clean-up measures have been in effective. Wasn't that what the piping off site supposes to take care of I would appreciate your response.

In the previous Staff Report, p. 102 my name was misspelled; the correct spelling is **Ginn Doose**, not Moose. I found it strange that a reference to my making comments was found under Moose, yet there was no response to my comments. If the Public Participation Process is to be up-held it is imperative to; (1) actually hear what the public's concerns are, and (2) have the staff respond to our comments. In order to assist the State in making sound decisions about impact in our communities and State we need the continual enforcement of the Public Participation Process.
Sincerely,

Ginn Doose

Ginn Doose
c/o P.O.Box 2310
Clearlake, CA. 95422
Home Owner of Simi Valley

707/637-6894

Teresa Jordan comments, dated 5/26/2010

3152 Shad Court
Simi Valley, CA 93063
May 26, 2010

Mr. Doug Cross
Los Angeles Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Re: TERMINATION OF WASTE DISCHARGE REQUIREMENTS - BOEING
COMPANY SANTA SUSANA FIELD LABORATORY, SANTA SUSANA,
CA(FILE NO. 04-022)--Order No. R4-2004-0112, Perchlorate.

Dear Mr. Cross:

I am opposed to the Regional Water Board terminating the July 1, 2004 adopted waster discharge requirements(WDRs) for the treatment of perchlorate contaminated soil at The Boeing Company's Santa Susana Field Laboratory facility in Santa Susana, California for the following reasons.

ORDER NO. R4-2010-00XX

- #1 - It is stated under finding number 3 that "Regional Board staff has verified, by inspection, that...any remaining perchlorate impacted soil has been removed". The finding states "any", not "all". (Page 1)
- #2 - It is stated under finding number 3 that "Surface water runoff from the Happy Valley area continues to be monitored pursuant to Order No. R4-2004-0058". Yet, it is stated on Page 3 of ORDER NO. R4-2010-XXXX that "IT IS HEREBY ORDERED, that Order No. R4-2004-0058, is terminated upon the effective date of this Order..." (Page 1)

Tentative Order No. R4-2010-XXXX is agendized for the Los Angeles Regional Water Board's June 3, 2010 meeting as item 10, and Order No. R4-2010-00XX is Agenda Item 8. (Page 2 of Agenda)

Please note that the first 3 pages of Tentative Order No. R4-2010-XXXX are not numbered, and the TENTATIVE

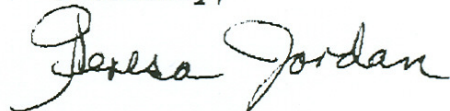
label on the side of pages 1 through 181 has the "I" misaligned. I did not include page 182 to 195 since the Table pages did not have the "TENTATIVE" label.

- #3 - It is stated under finding number 4 that "The Regional Board finds that these requirements are no longer applicable and shall be terminated, except for enforcement purposes". (Page 1)

Past NPDES violations, and past(2007) and present (2010) fines in the hundreds of thousands of dollars speak volumes that enforcement has not, is not, and will never be the Regional Water Board's priority. If anything, the California Attorney General's Office is blamed for this lack of follow through by the Los Angeles Regional Water Quality Control Board.

- #4 - The pages of Tentative Order R4-2010-00XX(2 pages) are not numbered.
- #5 - It is stated under item 8 of the June 3, 2010 Regional Water Board's meeting Agenda that "(Comment submittal deadline was June 2, 2010)". Not so, the comment deadline to date has been stated on the Regional Water Board's website as "Comment period for the tentative permit ends at 10:00 AM on June 1, 2010". Please refer to enclosed copy.
- #6 - The June 17, 2009 Board staff's "Response to Comments on the Draft 2008 303(d) List" states on Page 97 to my request to correct Ginn Doose's misspelled name of "Moose" on Page 102 of 103 that "Comment noted. The notice, issued on April 30, 2009, was intended to soliciting written comments for the 2008 Integrated Report and 303(d) list. Comments received and not pertaining to the 2008 Integrated Report or 303(d) list are beyond the scope of comments solicited. As such, these comments should be address to the relevant program". I request that Page 102 be corrected.

Sincerely,



Teresa Jordan

Chris Rowe comments, dated 5/28/2010

May 28, 2010

California Regional Water Quality Control Board,
Los Angeles Region
C/O Executive Officer,
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Re: TERMINATION OF WASTE DISCHARGE REQUIREMENTS – BOEING COMPANY
SANTA SUSANA FIELD LABORATORY, SANTA SUSANA, CA
(FILE NO. 04-022) Order Number R4-2004-0112

Dear Los Angeles Regional Water Quality Control Board of Commissioners,

I want to thank you once again for the opportunity to comment on this termination order. While I am the West Hills Neighborhood Council Public Health Chair, I am speaking on my own behalf. This Order has not been brought before the West Hills Neighborhood Council.

- 1** My first concern is that we no longer have Ms. Tracy Egoscue as Executive Officer. I feel the loss of her presence because I know that she understood the Santa Susana Field Lab and the complexities of this site. She knew the involved community members and she listened to our comments.

Cassandra Owens and David Hung have been the primary points of contact on the Santa Susana site for the 3 ½ years that I have been involved with the cleanup of the site.

In May, 2010, there were roughly three Public Comment periods for this property – the Boeing Storm Water Permit Amendment, the Boeing Settlement, and now this Termination of Waste Discharge Requirement – due June 1, 2010.

Each of these documents was issued by different people. It seems like there is now a lack of coordination within the Regional Board. Is this because of staff cutbacks due to the State Budget? If so, my recommendation to you is to communicate with the Governor – the Budget cuts are impacting the staffing for the Santa Susana Field Lab team.

Cassandra Owens has been the “go to person” on Santa Susana. She is responsible for all of my knowledge on the NPDES permit. I trust her skills and judgment. That is why I wonder why this notice was issued without the benefit of Cassandra Owen’s contact list for the Santa Susana Field Lab community?

Happy Valley discharges into Dayton Canyon. The Santa Susana Field Lab – the Boeing property – is on the eastern border of Ventura County and the western border of Los Angeles

County. Outfall 8 – Happy Valley – leaves that site, goes to Los Angeles County, and then enters into the City of Los Angeles in West Hills.

- 2 I question why, when the perchlorate hit issue was such a “hot button topic” for the Santa Susana community – in West Hills in particular – why no one on the West Hills Neighborhood Council is copied on this public notice document?

There is not one West Hills community member that I recognize on this list. There is no one on this list who has any obligation to notify or look out for the residents of Dayton Canyon or West Hills.

There is no one from Ventura County Supervisor’s that is noticed. No one from the Los Angeles County Board of Supervisors that is noticed. There is no one from the City of Los Angeles that is noticed – including our Mayor, our City Council, the Environmental Division, or the Bureau of Sanitation Stormwater division. There are no elected officials for the State noticed on this document.

I therefore recommend that you return this issue to the Regional Board staff to continue the Public Comment period for two months with proper notice.

- 3 While I have been to Happy Valley with Cassandra Owens, and I have seen the ISRA cleanup to bedrock, I have never seen any kind of summary document prepared that would show that the Regional Board is confident that there is no longer a perchlorate problem in Happy Valley.
- 4 I would ask that a fact sheet be prepared about the Happy Valley perchlorate cleanup. I request that it address the reasons that high levels of perchlorate were detected downstream in Dayton Canyon after that remediation was done.

I ask please that this fact sheet be written in simple language and directed to the West Hills Neighborhood Council. I ask that the Neighborhood Council be given assurances by the Regional Board that perchlorates are not a health risk to the West Hills community since the Happy Valley remediation.

I am glad to see that the Regional Board is satisfied that the bioremediation techniques for residual perchlorate are working. I understand that the bioremediation technique being used is the application of methyl soyate and calcium magnesium acetate.

While I am satisfied that under the Regional Board’s direction that both the removal of soil has been accomplished, and bioremediation has been implemented, I am not satisfied that anyone from any agency has addressed why we had high hits of perchlorate in Dayton Canyon, why it went from high levels to non-detect, if the perchlorates have gone from surface water to ground water, or if the perchlorates have just been diluted and continued downstream to the LA River. I think this is an important issue considering the fact that the Regional Board is looking at all TMDLs for the LA River. I do not know if perchlorates have been given a TMDL numeric limit.

Thank you again for this opportunity to comment.

Chris Rowe

*West Hills Neighborhood Council

* Public Health Chair

*For identification purposes only

7271 Darnoch Way

West Hills, CA

May 28, 2010

**California Regional Water Quality Control Board,
Los Angeles Region
C/O Executive Officer,
320 West 4th Street, Suite 200
Los Angeles, CA 90013**

2010 JUN 1 PM 3 48
CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

**Re: TERMINATION OF WASTE DISCHARGE REQUIREMENTS
BOEING COMPANY SANTA SUSANA FIELD LABORATORY,
SANTA SUSANA, CA
(FILE NO. 04-022) Order Number R4-2004-0112**

**Dear Los Angeles Regional Water Quality Control Board of
Commissioners,**

**I want to thank you once again for the opportunity to comment
on this termination order.**

**While I am the West Hills Neighborhood Council Budget Chair
and Secretary of the Environment Committee, I am speaking
on my own behalf. This Order has not been brought before the
West Hills Neighborhood Council.**

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as Executive Officer. I feel the loss of her presence because I
know that she understood the Santa Susana Field Lab and the
complexities of this site. She knew the involved community
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points of contact on the Santa Susana site for the 3 ½ years
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While I am satisfied, under the Regional Board's direction, that both the removal of soil has been accomplished, and bioremediation has been implemented, I am not satisfied that anyone from any agency has addressed why we had high hits of perchlorate in Dayton Canyon, why it went from high levels to non-detect, if the perchlorates have gone from surface

Chris Rowe comments, dated 5/31/2010

May 31, 2010

California Regional Water Quality Control Board,
Los Angeles Region
C/O Executive Officer,
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Re: TERMINATION OF WASTE DISCHARGE REQUIREMENTS – BOEING COMPANY
SANTA SUSANA FIELD LABORATORY, SANTA SUSANA, CA
(FILE NO. 04-022) Order Number R4-2004-0112

Dear Los Angeles Regional Water Quality Control Board of Commissioners,

I apologize to the Regional Board for this third comment within less than a 10 day period of time. However, you have had three Public Comment periods for the Santa Susana Field Lab due between May 12th and June 1st, 2010.

My request to you is to request in the future an “Executive Summary” at the beginning of each Public Comment document.

- 1 The documents that are out for Public Comment make assumptions. They include:
 - 1) that the reader has technical understanding of the documents and the ability to interpret them;
 - 2) that the reader has a familiarity with the site, and that they understand all of the aspects of the NPDES permit for the SSFL site;
 - 3) that the reader understands that there are other technical documents out for review at the same time, and that you are voting on one document without having been briefed on the other.

This is the situation that I find myself in. For example, this document that is circulated by Mr. D. Cross is in regards to the discharge of perchlorates from the SSFL site. If you read this document in isolation, you are lead to believe that Boeing is no longer has any operations that include perchlorates, and therefore, they no longer need a Waste Discharge Permit.

However, if you go to the Boeing Storm Water Amendment documents - the comments that were due on May 12th, 2010, you learn that Boeing is actually allowed to discharge perchlorates in their permit.

This is the agenda item on the perchlorates - comments due June 2nd, 2010:

http://www.swrcb.ca.gov/rwqcb4/board_info/agenda/2010/2010_0603_agenda.pdf

“Non-NPDES State Discharge Requirements

Termination-

*8. Termination of Waste Discharge Requirements Order No. R4-2004-0112 for The Boeing Company- Santa Susana field Laboratory for Remediation of perchlorate at Land Treatment Unit.”

(Comment submittal deadline was June 2, 2010) [Douglas Cross, (213) 620-2246]

This is the agenda item on the Boeing Storm Water Permit Amendment:

“Waste Discharge Requirements that Serve as Individual NPDES Permits

Renewal-

10. Consideration of tentative Waste Discharge Requirements for The Boeing Company, Santa

Susana Field Laboratory, Simi Hills; NPDES No. CA0001309 (Comment submittal deadline was

May 12, 2010) [Mazhar Ali, (213) 576-6652]”

Quite interestingly, there is no agenda item on the June 3rd, 2010 agenda for the Boeing Settlement comments.

Please tell me how you as the Regional Board of Commissioners can be expected to read a 195 page document let alone interpret it without an Executive Summary:

http://www.waterboards.ca.gov/losangeles/board_decisions/tentative_orders/individual/npdes/Boeing_Santa_Susana_Field_Lab/2010_0413/tent_wdr.pdf

On page 17 Adobe, they begin the "Effluent Limitations for Outfalls 11, 18, and 19. There are Benchmarks for Outfalls 1 and 2.”

On page 19 Adobe, there is a level for perchlorates:

“Effluent Limitations Maximum Daily: Perchlorates: 6.0 ug/l or 8.0 pounds per day squared” (sorry my keyboard does not type the ug symbol)

There are Effluent Limits are on Page 21 Adobe for Perchlorates. On page 21, why are there .89 pounds per day / squared when the other Outfalls have 8 pounds per day squared? You have to go back to page 20 Adobe to learn that these are for Outfalls 3-7, and 10. And there are Benchmarks for Outfalls 8 and 9. Those Benchmarks mean that if you have an exceedence, then you must order Boeing and NASA to go back to determine what the source was of the exceedence – if it can be found.

Then there are Benchmarks for Outfalls 12 -14. Why is the Benchmark for these Outfalls for Perchlorates .0002 pounds per day /squared?

I understand the purpose of Benchmarks and the use of BMPS. I realize that Outfalls 12 and 13 originate on NASA property.

I understand that 11, 18, 19, 1, and 2 all drain to Bell Creek. Outfall 8 drains to Dayton Canyon while Outfall 9 drains to Simi Valley. Thus, the majority of these Outfalls drain to the LA River system. I believe that Outfalls 12 and 13 drain to the Silvernale Pond, then to the R2 pond, and finally through Outfalls 18, and 2.

Outfall 14 is in Area 1. It drains to the R1 pond, through the GETS system? to the Perimeter pond? And on to Outfalls 11 and Outfall 19 – where the GETS Discharge location is?

Since this is what I am reading from an MWH Site Map with Outfall Locations and Storm Water Drainage Systems, dated July 21, 2009, this is my understanding of the drainages to the best of my ability.

I recommend that you not only have the Regional Board agency leaders coordinate their comment documents – work together to coordinate a consistent group of Public Comment documents. But I request please that you ask for Tables to be “reader friendly”.

For example, how does the reader of the Boeing NPDES Permit Amendment document put these limits into perspective? Are we to understand if this is an EPA mandated TMDL limit? Is this a site specific limit? Is this based on risk to aquatic life? Or is this based upon human drinking water standards? And finally, does the reader realize that the level of perchlorates that is safe to have in drinking water is subject to much debate within the EPA and within the State of California?

<http://www.cdph.ca.gov/certlic/drinkingwater/pages/Perchlorate.aspx>

“Perchlorate is a regulated drinking water contaminant in California, with a maximum contaminant level (MCL) of 6 micrograms per liter (µg/L). The MCL became effective October 2007. “

I recommend that you require Boeing and NASA to put on, under the over sight of the Regional Board, more educational meetings to assist the community to better understand the technical documents, but also so that they may be able to put all of the Contaminants of Concern for storm water, into perspective.

Thank you again for the opportunity to comment.

Sincerely,

Chris Rowe

*West Hills Neighborhood Council

*Public Health Chair

*for identification purposes only – comments as a West Hills resident only