
From: Steven Johnson <sjohnson@healthebay.org>
Sent: Friday, June 10, 2016 2:59 PM
To: WB-RB4-losangeles; Ali, Mazhar@Waterboards
Cc: Rita Kampalath
Subject: ref: Boeing Santa Susana Field Laboratory NPDES No. CA0001309, CI-6027, HHRA Work Plan Comments
Attachments: 2016-06-10_HTB_BoeingSantaSusana.pcif

Regional Board and Mr. Ali,

Please find Heal the Bay's comments in regard to *Boeing Santa Susana Field Laboratory NPDES No. CA0001309, CI-6027, 1-11-IRA Work Plan* enclosed.

Thank you,

Steven



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June 10, 2016

Mazhar Ali
Los Angeles Regional Water Quality Control Board
320 West 4th St., Suite 200
Los Angeles, CA 90013

VIA **EMAIL:** losangeles@waterboards.ca.gov; mazhar.ali@waterboards.ca.gov

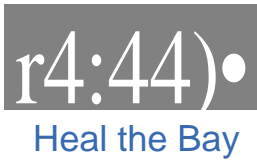
Re: Boeing Santa Susana Field Laboratory NPDES No. CA0001309, 0-6027, HHRA Work Plan Comments

Dear Mr. Ali,

On behalf of Heal the Bay, we submit the following comments on the *Revised Human Health Risk Assessment (HHRA) Work Plan for Surface Water Runoff Santa Susana Field Laboratory, Ventura County, CA (Order Pursuant to California Water Code Section 13383; CA 0001309, Cl No. 6027)* (HHRA Work Plan). Heal the Bay is an environmental organization with over 15,000 members dedicated to making the coastal waters and watersheds of greater Los Angeles safe, healthy, and clean. We appreciate the opportunity to provide comments on the Santa Susana HHRA Work Plan.

We were pleased to see the need for conservatism mentioned in the Work Plan several times, and we would urge the Regional Board to ensure that this commitment is carried out. As noted in the Work Plan, there are many potential sources of uncertainty within the analysis, so the most conservative approach should be used with regards to receptors considered, as well as the dataset used for the evaluation, for instance. The Work Plan mentions "not including data that are clearly not representative of current conditions" (p. 6). While it's important that the dataset used accurately represents site conditions, criteria for determining what is and is not representative should be clearly laid out.

In addition, given the past few years of drought, there should be an evaluation of how representative the flows associated with the proposed dataset are of long-term conditions, and how risk may change with higher flows from outfalls. Given that many of the constituents of concern at this site are likely to remain bound to soils long-term, perhaps until impacted soils are physically removed, it is critical that a range of hydrologic conditions be considered so that future conditions are taken into account. Further, given that monitoring is ongoing at the site, there should be periodic reevaluation of how well the dataset used for the HHRA captures most recent data, and a mechanism included for incorporating any new data into the HHRA that could result in higher risk.



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After evaluating past data collection we noticed within "Table 1: Number of Samples for Constituents Detected", that "Outfall 020" is not present within the data grid. This is most likely due to the fact that it has not yet been constructed (according to page 6 of the main document). To make it more convenient and clear for users of the work plan, a note should be added within the chart that "Outfall 020" is currently under construction and clarifying when values will be available in the future, and the timeline for conducting a risk assessment on discharges from that outfall.

A final recommendation, in the interest of clarity, is that the HHRA Work Plan includes a larger, easier to read map of the Santa Susana site for "Figure 1." Even after expanding the current PDF for Figure 1, it was difficult to see where the eight individual outfalls being studied were located. Another example is that the representations chosen for "Surface Water Ponds" within the map are quite difficult to find. We would recommend both enlarging the map and perhaps adding color to help clarify the positioning of contaminated water bodies and key locations for monitoring within the HHRA Work Plan.

Thank you for your consideration of these comments. If you have any questions please feel free to contact us at (310) 451-1500.

Sincerely,

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Steven Johnson
Water Resources Policy Analyst
Heal the Bay