Mohinder S. Sandhu, P.E. 12/22/2008
Permit Appeals Officer
Department of Toxic Substances Control (DTSC)
8800 Cal Center Drive, MS R1-2
Sacramento, CA 95826

cc. Susan Callery & Norm Riley DTSC, Christina Walsh Cleanuprocketdyne dot org, Assemblymember Julia Brownley.

re: Class 2 Permit Modifications for two Post- Closure Permits (PC- 94 / 95- 3- 02 , 20 MOD SC3- 111904-A and PC 94 /9 5-3-03, MOD SC3 -1 11904-B)

Dear Mr. Sandhu,

Please enter into the record my written arguments on the comments and issues that have been granted review by the Department of Toxic Substances Control (DTSC) for the Two Hazardous Waste Permit Decisions Issued to the Santa Susana Field Laboratory (SSFL) – AREAs I, II, and III in the Simi Hills of California 93065.

First off I found this link to be inactive over the weekend and the day the comments are due...
http://www.dtsc.ca.gov/HazardousWaste/Projects/upload/SSFL_Order1_Appeal.pdf

This is not helpful for members of the community who are commenting on this post-closure permit.

In the Boeing Comment II-A **27 The Permit Imposes An Excessive Constituents of Concern** Analysis That Does Not Adequately Consider Historical Data.
Historical Data is impotant and we have learned that records have been destroyed because of Radiological Contamination. This is a great concern and does not limit itself to AREA IV. There have been findings of Radium in the AREA I Burn Pit and we have documents that prove the Department of energy (DOE) did work in the Bowl of AREA I. There were findings of Plutonium in the drainage of the ELV in AREA II that is not being monitored as it bypasses National Pollutant Discharge Ellimation System (NPDES) Permitted outfall number 9 according to the Mc Laren Hart Study done in the early 1990's.

Boeing Comment II-B Requiring Quarterly Monitoring Disregards Historical Sampling and Water Quality Trends

The groundwater is a big issue at the SSFL as it has not been fully understood. With the unpredictability of the Chatsworth Formation, the Geology that is covering most of the site, we have yet to understand which way the impacted groundwater is flowing. In the year 2000 NASA and The Boeing Company turned off a few of the groundwater pump and treat systems and in that same year over 70 deep draw sump pumps were installed to remove groundwater from a nearby train tunnel. With the pumping of over 4300 gallons a day, this could be drawing the TCE Further offsite. We have noticed the TCE Plume heading in that direction as we have seen from the offsite wells at the Santa Monica Mountains Conservancy Parkland of Sage Ranch…

http://www.cleanuprocketdyne.org/documents/curo_eir/Chatsworth%20Groundwater%20to%20surface.pdf

Based on our presentation The Los Angeles Regional Water Quality Control Board (RWQCB) issued a letter to the owners of these pumps to implement a monitoring program…

http://acmela.org/images/Train_Tunnel_26_Located_in_Ventura_Subdivision_Requirement_to_submit_report_File_08-156_2008-11-19.pdf

We are looking forward to the results of their findings in the year 2009.

Boeing Comment II-C The Monitoring Network Includes Existing Wells Unrelated to the Regulated Units

The Alfa Bravo Skim Pond (ABSP), yet in a NASA Powerpoint to Assemblymember Julia Brownley they claim that they need to stop looking at it. You can download this Powerpoint here…

http://acmela.org/april2008.html

Also, in this document from a UCLA Study it claims that the ABSP was used for "The Alfa and Bravo test areas are currently the only rocket engine test areas in operation. The Alpha-Bravo pond traps and retains raw fuel, lubricant oil, and other hydrocarbons from the test firings and/or spills in the Alpha-Bravo test area (DHS, 1999). STL is a NASA-associated test stand and laboratory. "

http://www.polysep.ucla.edu/ssfl/Downloads/SSFL%20Report/SSFL%20Appendices/Appendix%20D_Facilities_Final.pdf

Again we notice Hydrocarbons.

In the Boeing Comment II-D The Monitoring Network Inappropriately Includes Wells Owned by Parties Other Than NASA or Boeing The permit modification includes several monitoring wells that are not owned or controlled by NASA or Boeing (e.g. •

03- 26) . *Hazardous Waste Facility Post Closure Permit Rocketdyne. Santa Susana Field Laboratory. Areas I and II* (PC-94195- 3- 02) . *Table 7* . The permit should include only Boeing or NASA owned wells.

There are offsite well that have been sampled in the past that do not belong to NASA or The Boeing Company, yet should be monitored the same as onsite wells. One example are the wells on the American Jewish University Brandeis-Bardin Campus (BBI). Their "Bathtub Well" experienced hits of Perchlorate and other constituents of concern. There have also been hits of Trichloroethylene (TCE) on the offsite wells in Runkle Canyon. TCE was used extensively by NASA, the Boeing Company and their predecessors for use in Rocket-Engine Testing and Flushing of Liquid Oxygen (LOX) pipelines.

In the Boeing Comment II-E The Sampling and Analysis Requirements Include **Constituents Not Associated with the Impoundments or** Otherwise Inappropriate (1) Perchlorate. Perchlorate was not a chemical identified to have been used at any of the nine closed surface impoundments. Supporting documentation has been
provided previously to the DTSC indicating that perchlorate

I just gave you one example of the wells on the American Jewish University Brandeis-Bardin Campus. Their "Bathtub Well" experienced hits of Perchlorate and other constituents of concern. Recently DTSC discovered in the Northern Drainage leading to BBI over 1100 Rocket-Engine Igniters where Perchlorate may have been used. Perchlorate is Still a Huge Issue.

In the Boeing Comment II-E (4) Napthene/Naphthene. We assume DTSC means to refer to Napthene/Naphthene and not Napthalene. Naphthenes 9 **identified in relation to chemical use at the impoundments** 10 **are a generic group of hydrocarbons characterized by saturated carbon atoms in a ring structure (also called** "cycloparaffin or cycloalkane"). Naphthalene is a poly-aromatic hydrocarbon which can be determined using EPA ' 2 method 8260B (chemical formula ClOH8).

The PAH's were also found in large amounts by DTSC discovered in the Northern Drainage leading to BBI.

In the Boeing Comment II-E (5) Hydrazine. Hydrazine, Monomethyl Hydrazine, and UDMH **are unstable and have short half-lives in the environment** '5 and are no longer utilized at SSFL. Boeing has previously 16 sampled and analyzed groundwater in the vicinity of the impoundments for breakdown or daughter product s (e .g.,17 formaldehyde an d n-nitrosodimethylamine). However, the **DTSC requirement for hydrazine analysis is premature and** '8 **inappropriate at this time since their proposed new method** ' 9 **requires additional evaluation to determine their accuracy** and availability of reliable commercial laboratories to perform 20 the proposed analysis. Furthermore, the Department of Health Services has not certified analylical methodologies 2 ' and the applicability of the test methods proposed by DTSC. 22 *Post-Closure Permits, Table 4*.

Hydrazine tanks are found throughout the site and leakage and employee error could have had an impact.

Boeing Comments '"-A, III-B, and III-C **The Modification Contains Several Factual Errors or Omissions**

These Errors or Omissions need to be better explained by NASA and The Boeing Company before I can properly comment. We have seen several wells placed in areas that will not get "Hits" jus because of placement. This is a common practice and needs to be addressed.

With the passing of Senate Bill 990 The Boeing Company needs to follow this law as signed by our Governor and put forth by former Senator Sheila Kuehl and Current Assemblymember Julia Brownley. We support Phil Chandler and his comments.

Thank you in advance for all your work on these issues.

Take care,

William Preston Bowling - Founder/Director
ACME (Aerospace Cancer Museum of Education)
williampprestonbowling@yahoo.com
310.428.5085
http://www.ACMEla.org
23350 Lake Manor Drive
Chatsworth, California
91311