



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Agency Secretary

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Arnold Schwarzenegger
Governor

June 30, 2010

Mr. Thomas D. Gallacher
Director, SSFL – Environment, Health & Safety
The Boeing Company
Santa Susana Field Laboratory
5800 Woolsey Canyon Road
Canoga Park, CA 91304-1148

COMMENTS ON 2010 INTERIM SOURCE REMOVAL ACTION (ISRA) WORK PLAN ADDENDUM SUBMITTED IN RESPONSE TO A CALIFORNIA WATER CODE SECTION 13304 ORDER – THE BOEING COMPANY, SANTA SUSANA FIELD LABORATORY, CANOGA PARK, CA (NPDES NO. CA0001309, CI NO. 6027, SCP NO. 1111, SITE ID NO. 2040109)

Dear Mr. Gallacher:

Los Angeles Regional Water Quality Control Board (Regional Board) staff have reviewed the April 2010, *2010 Interim Source Removal Action (ISRA) Work Plan Addendum Santa Susana Field Laboratory Ventura County, California* (Addendum) submitted in response to a California Water Code Section 13304 Order dated December 3, 2008. The Addendum, prepared for you by MWH Americas, Inc., was received by the Regional Board on April 30, 2010. During recent conference calls and in recent emails Regional Board and California Department of Toxic Substances Control (DTSC) staff provided comments on the Addendum. The comments were addressed in the June 14, 2010, document with the subject *Responses to RWQCB and DTSC comments on the 2010 Interim Source Removal Action (ISRA) Work Plan Addendum Submitted in Response to California Water Code Section 13304 Order (NPDES No. CA0001309, CI No. 6027, SCP No. 1111, Site ID No. 2040109)* (Comments). The Comments included an errata package. The contents of the errata package were inserted into the Addendum. The Comments and associated errata package fully addressed the issues raised by the Regional Board and the DTSC.

Based on the aforesaid, the Addendum, as revised on June 14, 2010, is approved, subject to the following:

Health and Safety Plan: All work shall be performed in accordance with a Health and Safety Plan, as specified in Section 3.1 of the Addendum.

Erosion Control Plan: All work shall be performed in accordance with a site-specific Storm Water Pollution Prevention Plan (SWPPP), as specified in section 3.1 of the Addendum, which shall include appropriate best management practices (BMPs) for erosion control.

Soil Management Plan: All work shall be performed in accordance with a Soil Management Plan that will provide procedures for characterization, handling, storage, disposal, and documentation of soil generated during construction activities, as specified in section 3.1 of the Addendum.

Transportation Plan: All work shall be performed in accordance with a Transportation Plan which defines procedures for transporting personnel, equipment, and materials to facilitate safe and efficient traffic flow within the facility and on public roadways, as specified in section 3.1 of the Addendum.

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Biological and Archeological Surveys: Biological and archeological surveys shall be performed prior to and/or during the implementation of remedial actions, as specified in section 3.2 of the Addendum. Environmentally sensitive areas (ESAs) shall be identified before the performance of any work, and a qualified biologist or archeological monitor shall be on site during the performance of any work that could disturb any ESAs.

Streambed Alteration Agreement: All work shall adhere to the requirements of Streambed Alteration Agreement No. 1600-2003-5052-R5 (September 11, 2007), as amended, with the California Department of Fish and Game, as specified in section 3.2 of the Addendum.

Clean Water Act (CWA) Section 404 permit and Section 401 certification: All work shall adhere to the requirements of CWA Nationwide Permit 38 from the U.S. Army Corp of Engineers and CWA Section 401 water quality certification from the Regional Board, as specified in sections 3.2 of the Addendum.

In addition, the discharger shall coordinate the timing, design, construction, and implementation of any BMPs or engineered natural treatment systems (ENTS) with Regional Board staff as part of project implementation. Regional Board staff shall address any BMPs or ENTS, whether proposed by the discharger or required by the Regional Board, comprehensively as part of the ISRA.

Please telephone Mr. Peter Raftery at (213) 576-6724 or email him at praftery@waterboards.ca.gov if you have any questions.

Sincerely,


Samuel Unger
Interim Executive Officer

cc: Honorable Alex Padilla, Senator 20th District
Honorable Fran Pavley, Senator, 23rd District
Honorable Tony Strickland, Senator 19th District
Assemblymember Bob Blumenfield, Assemblymember 40th District Assembly
Assemblymember Pedro Nava, Assemblymember 35th District
Assemblymember Audra Strickland, Assemblymember 37th District
Mr. Jarrod Degonia, c/o Assemblymember Cameron Smyth
Ms. Rondi Guthrie, c/o Assemblywoman Audra Strickland
Ms. Samantha Stevens, c/o Assemblymember Bob Blumenfield
Mr. Aron Miller, c/o Senator Fran Pavley
Ms. Linda Parks, Ventura County Board of Supervisors
Ms. Louise Rishoff, c/o Assembly member Julia Brownley
Mr. Damon Wing, c/o Ms. Linda Parks, Ventura County Board of Supervisors
Mr. Gerard Abrams, Department of Toxic Substances Control, Sacramento

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Ms. Carol Henderson, Office Manager, Bell Canyon Homeowners Association
Mr. Dan Hirsch, Committee to Bridge the Gap
Ms. Heather L. Hoecherl Esq., Director of Science and Policy, Heal the Bay
Mr. Philip Isorena, State Water Resources Control Board, Division of Water Quality
Ms. Kirsten James, MESM, Staff Scientist, Heal the Bay
Ms. Stephanie Jennings, United States Department of Energy
Ms. Barbara Johnson, Susana Knolls Homeowners, Inc.
Dr. Michael Josselyn, WRA, Inc.
Mr. Thomas Johnson, ETEC Project Manager, United States Department of Energy
Ms. Teresa Jordan
Mr. Thomas Kelly, Environmental Protection Agency, Region 9, (WTR-5)
Dr. Jae Kim, Tetra Tech
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Mr. Wayne Lee
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Ms. Carissa Marsh, The Simi Valley Acorn
Ms. Marie Mason

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California State University, Northridge
City Manager, City of Simi Valley
City of Los Angeles, Bureau of Engineering, Wastewater Systems Engineering Division
Department of Health Services, Public Water Supply Branch
Department of Interior, U.S. Fish and Wildlife Service
Environmental Protection Agency, Region 9, Office of Radiation Programs
Environmental Protection Agency, Region 9, Permits Branch (WTR-5)

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Mr. Thomas D. Gallacher
The Boeing Company

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Los Angeles and San Gabriel Rivers Watershed Council
Los Angeles County, Department of Health Services
Los Angeles County, Department of Public Works, Environmental Programs Division
Masry & Vititoe Law Offices
NOAA, National Marine Fisheries Service
Simi Valley Library
The Boeing Company Santa Susana Field Laboratory
U.S. Army Corps of Engineers
ULARA Watermaster
Ventura County Air Pollution Control District
Ventura County Environmental Health Division
Ventura County Public Works
Water Replenishment District of Southern California

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