California Regional Water Quality Control Board

Los Angeles Region

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: http://www.waterboards.ca.gov/losangeles

Arnold Schwarzenegger
Governor

September 22, 2009

Mr. Gary Butner, Chief
Radiologic Health Branch
California Department of Public Health
1500 Capital Avenue
MS 7610
Sacramento, California 95814-5006

Dear Mr. Butner:

DISPOSAL OF INTERIM SOURCE REMOVAL ACTION (ISRA) SOILS FROM OUTFALL 009 AT BOEING'S SANTA SUSANA FIELD LABORATORY TO A CLASS 1 HAZARDOUS WASTE LANDFILL

The Regional Board is overseeing an interim source removal action of contaminated soils at two outfalls at the Santa Susana Field Laboratory in Chatsworth, CA. The ISRA is addressing approximately 4,000 cubic yards of soil that is primarily impacted by levels of metals and dioxins that exceed concentrations in the California Toxic Rule. The Regional Board is requesting that the California Department of Public Health Radiologic Health Branch provide written direction regarding the final disposition of the soils that have elevated concentrations of Cesium-137 that are scheduled for excavation. The information provided by Boeing indicates that the soils may be disposed of at a Class 1 or Class 2 landfill in the State of California. If you disagree with their conclusion, please provide your assessment of the data provided in the attached September 11, 2009, letter from Boeing and your recommendation regarding the final disposition of the soils.

The following provides a summary of the Regional Board's oversight activities of the Interim Source Removal Activities (ISRA) at the Santa Susana Field Laboratory for your information: The Executive Officer of the Regional Board on December 3, 2008, issued a California Water Code Section 13304 Order to perform interim/source removal action of soils in the areas of Outfalls 008 and 009 Drainage Areas to the Boeing Company. The Order directed the Discharger to cleanup and abate the wastes that are discharging to waters of the State, minimize impacts to the streambed and adjacent habitat during the cleanup, protect the water quality during and after the cleanup, and restore the streambed and surrounding habitat following the cleanup. The cleanup will require the excavation of soils within the watersheds of Outfalls 008 and 009.

The Discharger submitted a work plan which was reviewed by and commented on by both the Regional Board and California Department of Toxic Substances Control (DTSC) staff. In

compliance with that work plan, the Discharger completed characterization sampling and analysis of soils collected from the targeted ISRA areas. That sampling yielded elevated concentrations of Cesium-137 relative to background in the two areas where ISRA activities are planned for in the watershed of Outfall 009. The Waste Certification, figures and the data attached to the referenced Boeing letter provides the detailed analysis of the data collected.

The analysis by Mr. Phil Rutherford, the facility Manager of Health, Safety & Radiation Services, indicates that the soils may be disposed of at a Class 1 or 2 landfill in the State of California. Regional Board staff is requesting direction from the CDPH Radiologic Branch with regard to the disposal of these soils.

We would appreciate a response at your earliest convenience, as we would like the excavation of the soils to proceed as soon as possible. If you have any questions please contact Peter Raftery at (213) 576-6724 or Cassandra Owens at (213) 576-6750.

Sincerely,

Samuel Unger
Assistant Executive Officer

Enclosure: September 11, 2009 Letter from the Boeing Company to Mr. Gary Butner

cc: Mr. Rick Brausch, California Department of Toxic Substances Control
Mr. Jim Pappas, Department of Toxic Substances Control
Mr. Gerard Abrams, Department of Toxic Substances Control
Mr. Buck King, Department of Toxic Substances Control
Ms. Tracy Egoscue, Los Angeles Regional Water Quality Control Board
Mr. Peter Raftery, Angeles Regional Water Quality Control Board
Ms. Cassandra Owens, Angeles Regional Water Quality Control Board
Mr. James Thomas, California Department of Public Health, Radiologic Health Branch
Mr. Allen Elliott, National Aeronautics and Space Administration
Mr. Steven Slaten, National Aeronautics and Space Administration
Mr. Thomas Gallacher, Boeing Company
Mr. Arthur Lennox, Boeing Company
Mr. Phil Rutherford, Boeing Company
Ms. Lori Blair, Boeing Company