

Interim Source Removal Action (ISRA)

Did It Work?

By Alex Hernandez

As you have just heard from the previous speaker, Boeing violated pollution discharge limits for years, resulting in numerous fines, but the violations continued.

**In 2005, the Regional Board
issued Boeing a Cleanup &
Abatement Order, but the
Violations Continued**

**In 2007, the Regional Water
Board Issued a Cease and Desist
Order, but the Violations
Continued**

**STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION**

CEASE AND DESIST ORDER NO. R4-2007-0056

**REQUIRING THE BOEING COMPANY, SANTA SUSANA FIELD LABORATORY
TO CEASE AND DESIST DISCHARGES OF CONTAMINANT CONCENTRATIONS IN EXCESS
OF APPLICABLE WATER QUALITY STANDARDS TO WATERS OF THE UNITED STATES**

Because of continuing violations, in December 2008, the Regional Water Board Issued an Order Directing an Interim Source Removal Action (ISRA) for Outfalls 8 and 9



California Regional Water Quality Control Board

Los Angeles Region



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>

Linda S. Adams
Cal/EPA Secretary

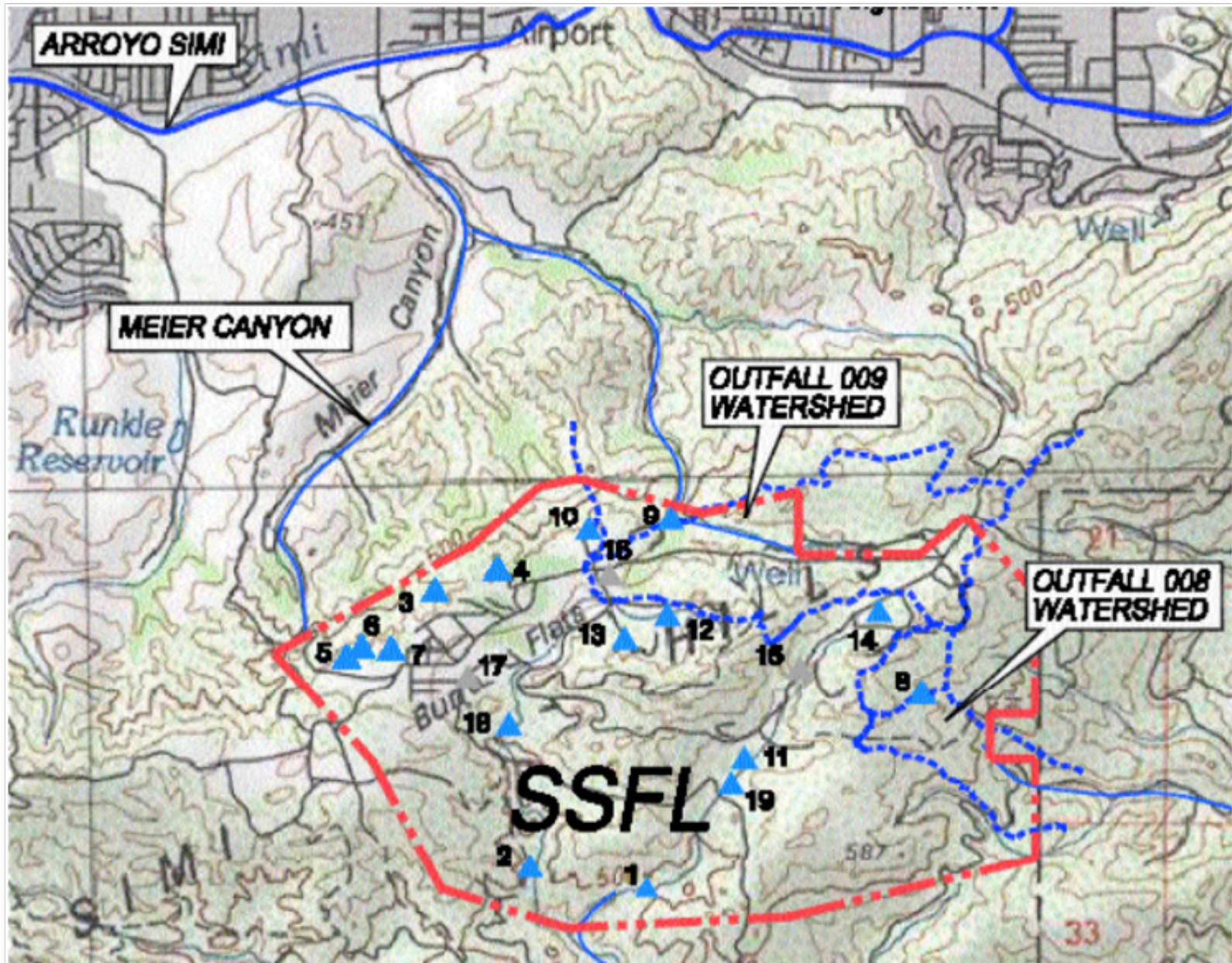
Arnold Schwarzenegger
Governor

December 3, 2008

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

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**CALIFORNIA WATER CODE SECTION 13304 ORDER TO PERFORM INTERIM/SOURCE
REMOVAL ACTION OF SOIL IN THE AREAS OF OUTFALLS 008 AND 009 DRAINAGE
AREAS, THE BOEING COMPANY SANTA SUSANA FIELD LABORATORY,
UNINCORPORATED VENTURA COUNTY, CALIFORNIA (SCP NO. 1111, SITE ID NO.
2040109)**



Discharge Outfall 008 – This outfall captures storm water runoff from an area that has previously been used for operations that involved perchlorate and other contaminants of concern. Storm water from Happy Valley flows to Dayton Canyon Creek. The flow from Dayton Canyon Creek joins Chatsworth Creek, which flows south to Bell Creek southwest of the intersection of Shoup Avenue and Sherman Way. Bell Creek flows east to the Los Angeles River.

Discharge Outfall 009 – The watershed that drains into Outfall 009 is on Boeing and NASA property and begins near the entrance to the property and traverses several potential areas of concern. The Outfall collects storm water runoff from the Area 1 and Area 2 Landfills, and the former LOX plant located on NASA owned property. In addition, Outfall 009 picks up storm water run on from Sage Ranch where agricultural operations took place and a gun shooting range was located. This outfall drains to Arroyo Simi.

In the ISRA, Boeing was ordered to stop the exceedances of pollution limits from Outfalls 8 and 9 by removing some of the contamination near the outfalls (“source removal”) and by constructing “engineered natural treatment systems”

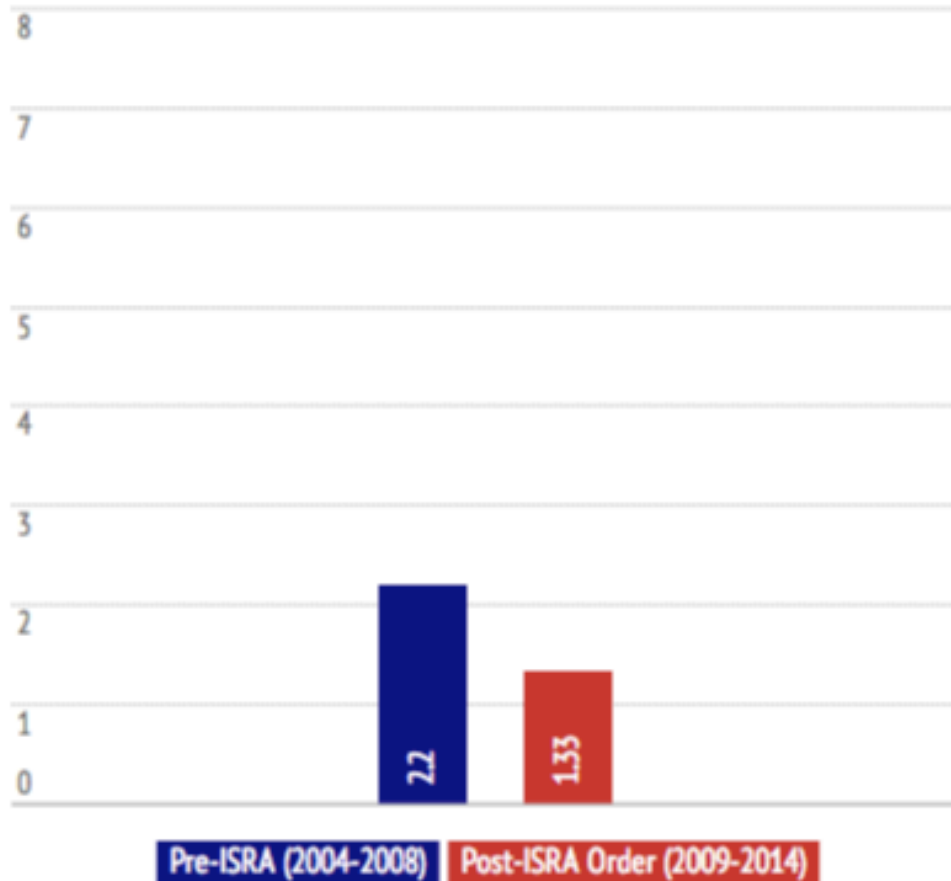
Rather than clean up the full contamination at the site, the source of the offsite migration, Boeing said that by removing a bit of the contamination near the outfalls they could stop the pollution leaving the site.

The question we are examining today is whether the ISRA worked? Did it stop the exceedances at Outfalls 8 and 9?

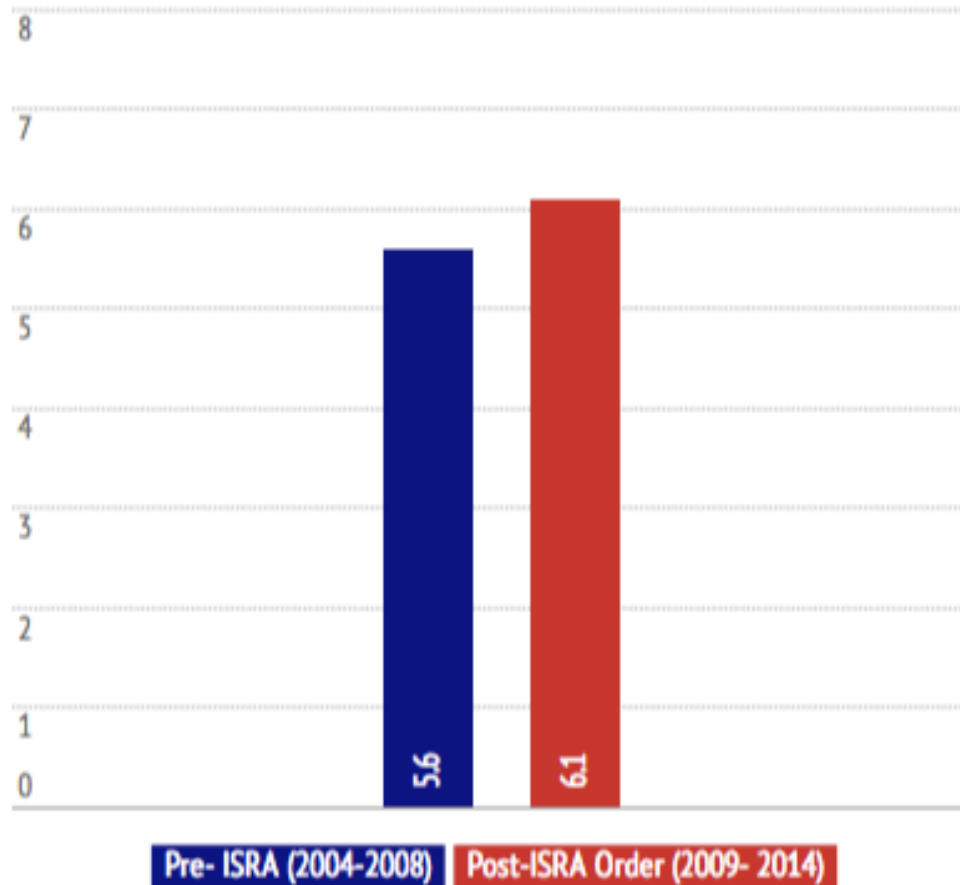
Analytical Approach

We went through SSFL surface water monitoring reports from 2004 through the 1st Quarter of 2014, Comparing Exceedances Before the ISRA and after

Average Annual Exceedances of Pollution Limits Pre- and Post-ISRA Outfall 008

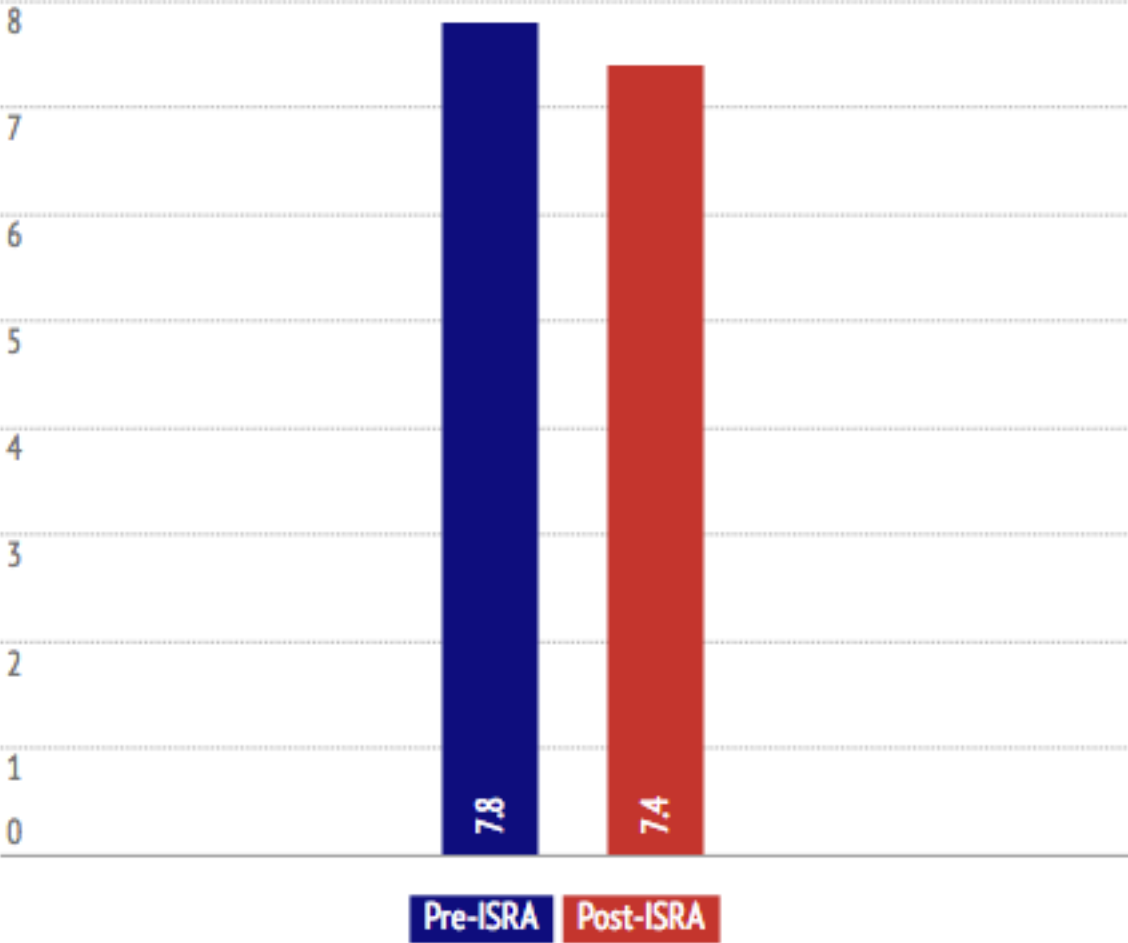


Average Annual Exceedances of Pollution Limits Pre- and Post-ISRA Outfall 009



Outfalls 008 & 009

Combined Exceedances Average



Results

The exceedances have not stopped since the ISRA.

Exceedances have been present as recently as a few months ago.

Conclusions

The fines have not
stopped the violations.

The Water Board Cease
and Desist and
Abatement Orders have
not stopped the
violations.

The ISRA has not
stopped the
exceedances.

If the site is not fully cleaned up, pollution will continue to migrate offsite.