

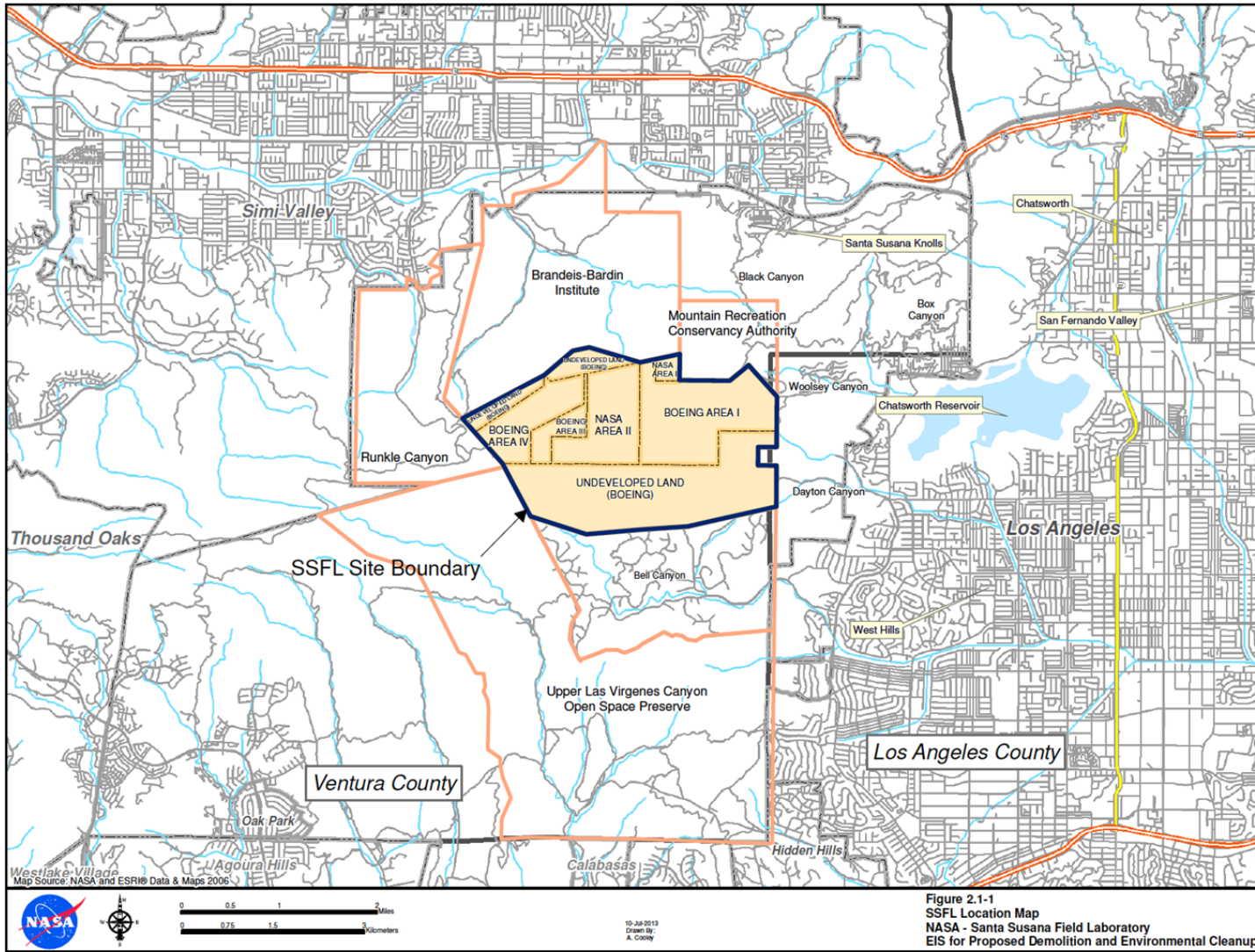
# Review of Proposed Water Board permit for Boeing at SSFL

- The LA Water Board is the entity responsible for writing and enforcing the permits regulating the water migrating off the SSFL site.
- The intent of these permits is to protect the public from health hazards in this water.
- If the LA Water Board passes the new tentative permit, our community will be stuck with this permit until 2020.



- SSFL is on top of a hill.
- When it rains radioactive and chemical contamination runs down the hill in multiple locations.





- Water runs into Bell Creek (headwaters for the LA River) , Arroyo Simi, Runkle Canyon, and Dayton Canyon.

# What are the issues with the new permit?

1. The process has not been transparent and accessible to the public.
2. The old permit was weak to begin with. And expired actually.
3. The new permit is even less protective of public health.

# It appears the water board was playing “hide the ball” with the draft of the new permit.

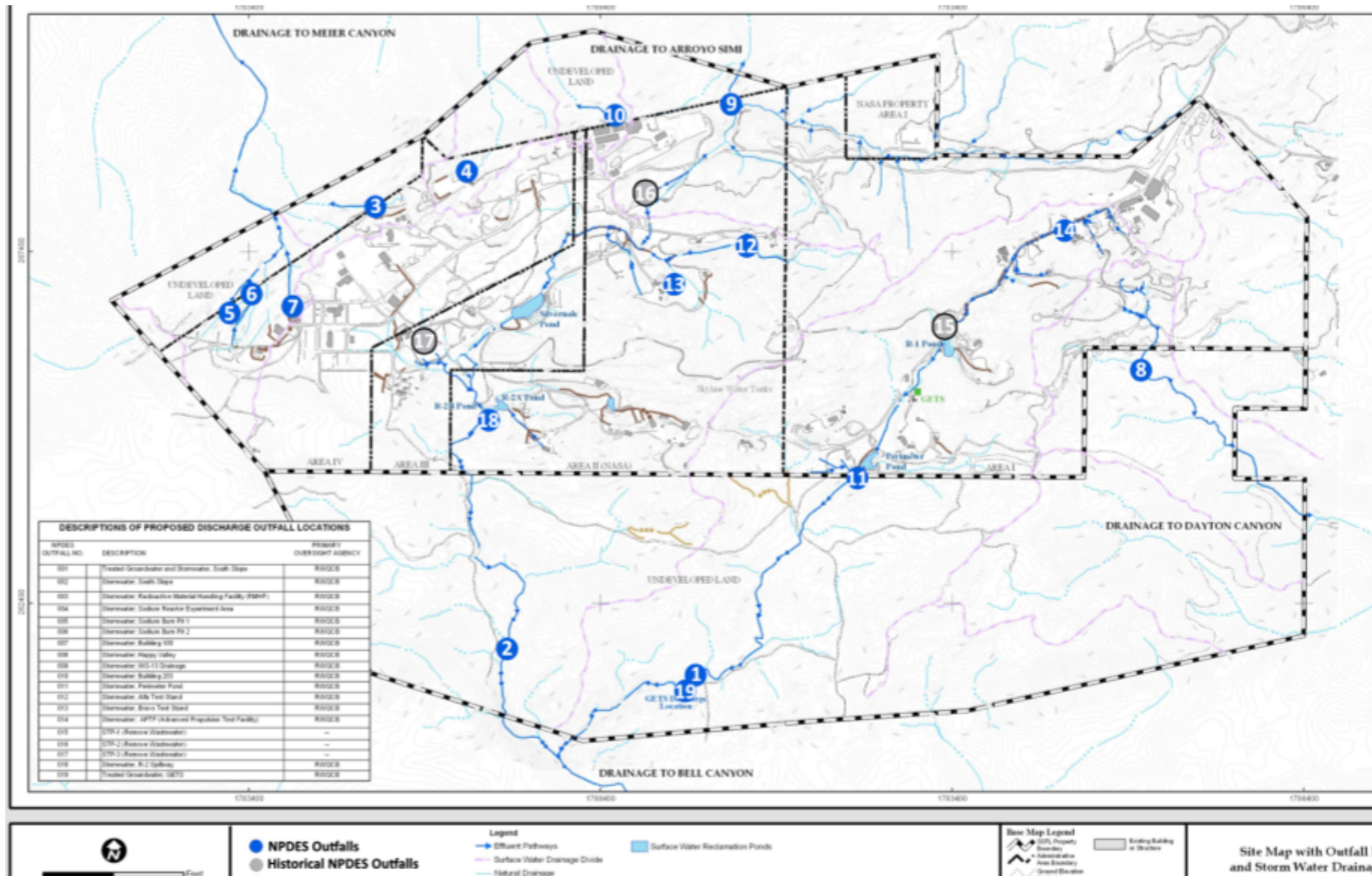
- Recent actions by the LA Water Board bring into question the agency’s desire for public input on the draft.
- The Board took 14 months to write the new permit and gave the public only 30 days *over the holidays* to provide public feedback.
- The proposed permit and request for comments wasn’t even posted on their website as recently as a couple of days before the comments were due.

# Transparency concerns continued

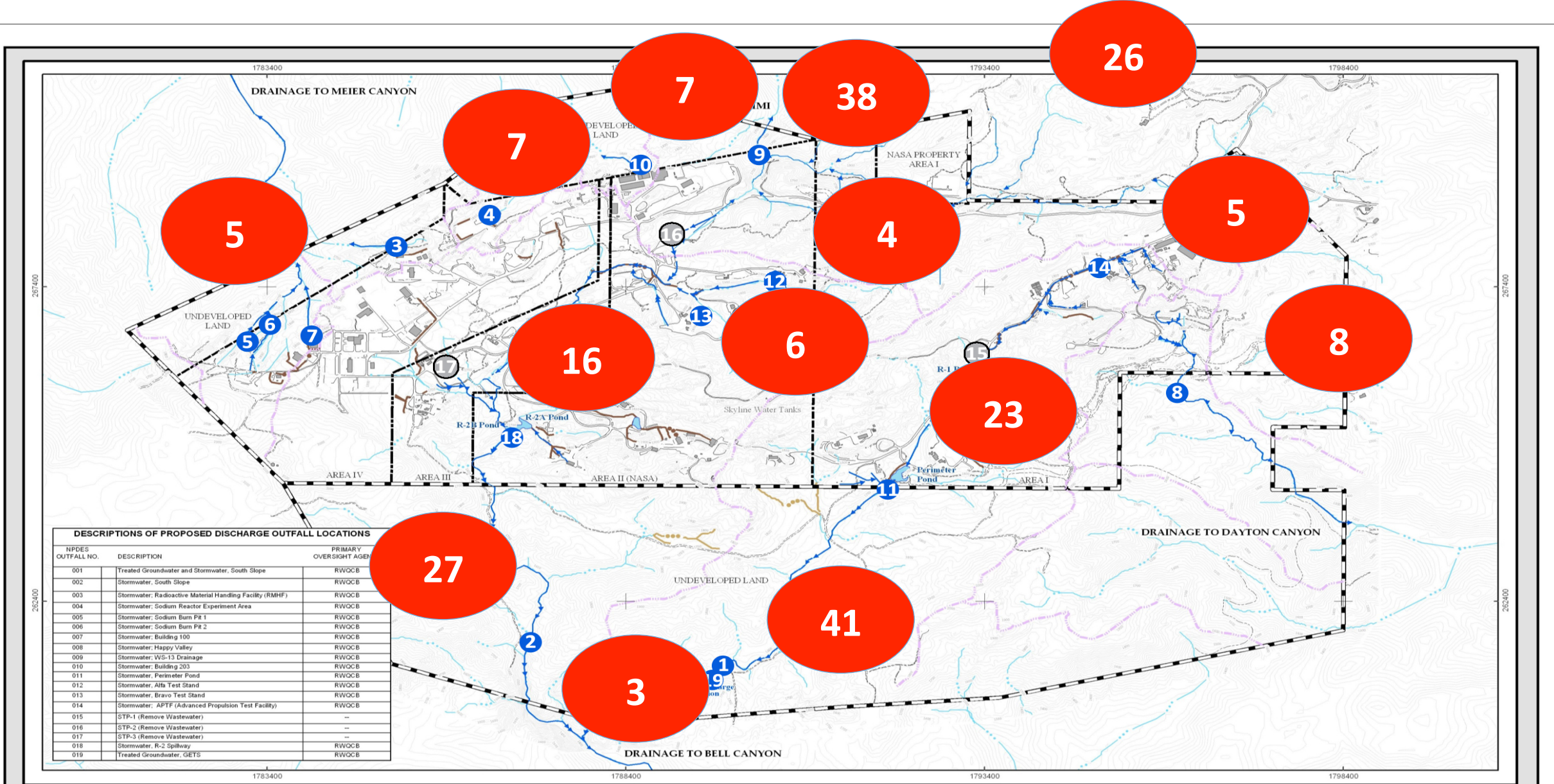
- They called the new permit a “reissuance” but in fact had changed many things, almost all of which provide less protection to the public.
- No list of changes was provided . This meant members of the public had the nearly impossible task of comparing line by line a 180 page document to a 195 page document.
- Research shows a list of changes for new permits is standard practice.



Keeping Boeing's application for permit renewal secret can lead to a situation where backroom deals between polluter and regulator may result.



The water is monitored via 19 different locations called outfalls



- NPDES Outfalls
- Historical NPDES Outfalls
- Groundwater Extraction Treatment System (GETS)
- Exceedances per outfall

- Legend**
- Effluent Pathways
  - Surface Water Drainage Divide
  - Natural Drainage
  - Concrete Lined Drainage
  - Graded Drainage
  - Surface Water Reclamation Ponds

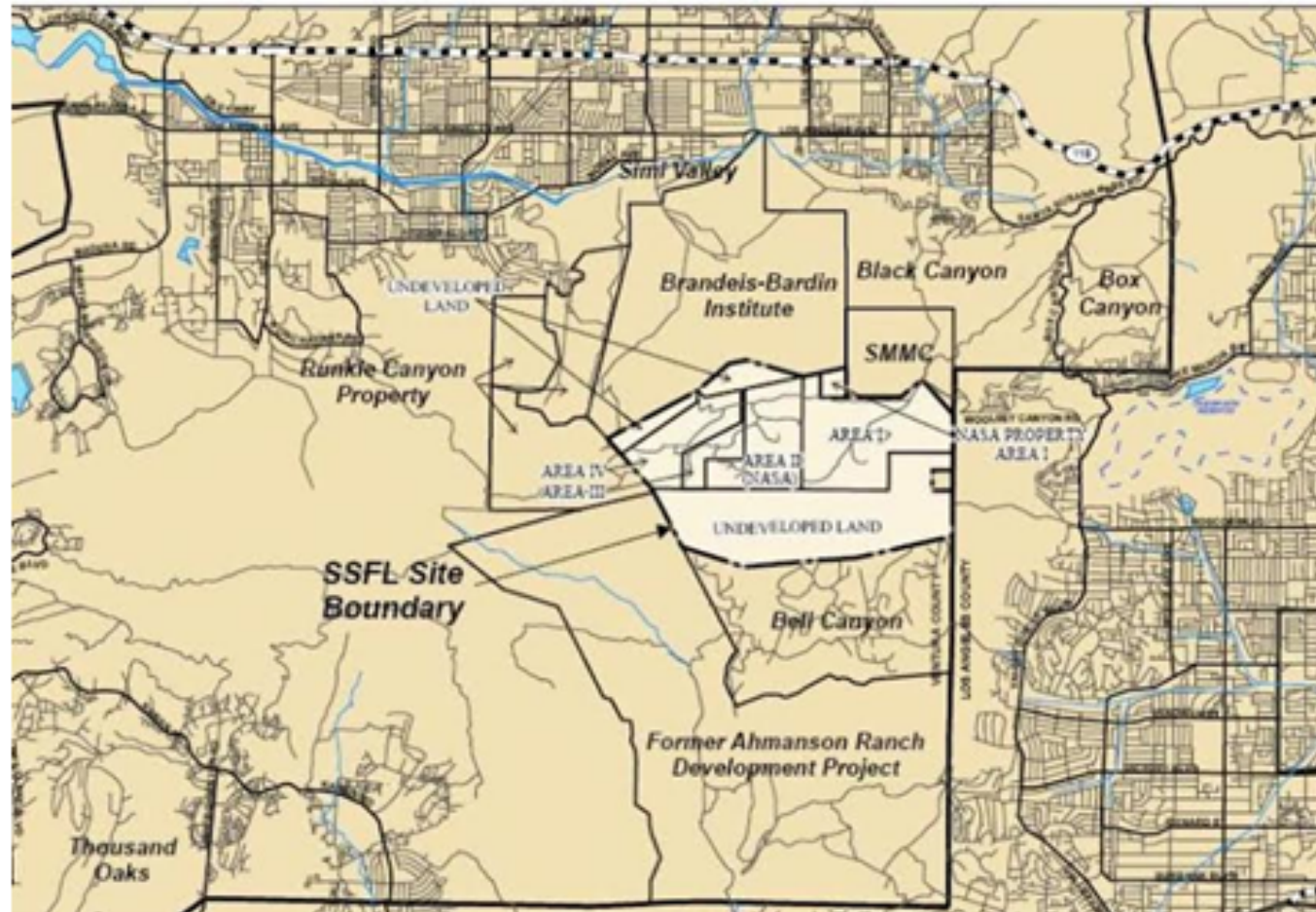
- Base Map Legend**
- SSFL Property Boundary
  - Administrative Area Boundary
  - Ground Elevation Contours
  - Drainage Pathways
  - A/C Curbing
  - Det Road
  - Existing Building or Structure

**Site Map with Outfall Locations and Storm Water Drainage Systems**

Date: April 12, 2016  
 File: \\unp\out\app1\dat\crackdown\gis\MapInfo\016\files\SiteMap\Projects\NPDES\NPDES\_StormWaterDrainage.mxd

FIGURE 2

### Santa Susana Field Laboratory Regional Map



# Existing Worrisome Provisions Carried Over

- Like the old permit, the new one takes only one sample annually for radioactive contaminants. This seems absurd for the site of a partial nuclear meltdown recently found by the EPA to have at least 500 areas of radioactivity.
- It establishes non-enforceable “benchmarks” instead of enforceable numerical limits for several outfalls.
- It eliminates requirements that both grab and composite samples be taken.

# Concern the new permit offers even less public protection

- Some limitations on contaminants have been loosened to allow up to 4 times more contamination PER DAY at outfalls 3 to 10.
- The limitation for mercury, was changed from .02lbs to .07lbs per day.
- The level of oil and grease allowed in the water increased from about one ton to FOUR TONS per day.
- The boron limit increased from 148 pounds to 537 pounds.
- The nitrate limit increased from 1,888 pounds to 5,365 pounds.

# Concerns continued

- The permit eliminates all monitoring and compliance requirements for acute toxicity.
- The requirements for monitoring for radioactivity have changed in a fashion that weakens them.

# Additional concerns

- All monitoring and pollution limits are entirely eliminated for Outfalls 12, 13, and 14.
- These outfalls were tested 17 times since 2008 and found to have 15 violations.
- They have eliminated all monthly average pollution limits.
- Sampling is not occurring frequently enough.



# SSFL Sampling Events

Year	Sampling Events
2008	50
2009	26
2010	45
2011	45
2012	16
2013	3
2014 (through 2nd quarter)	2

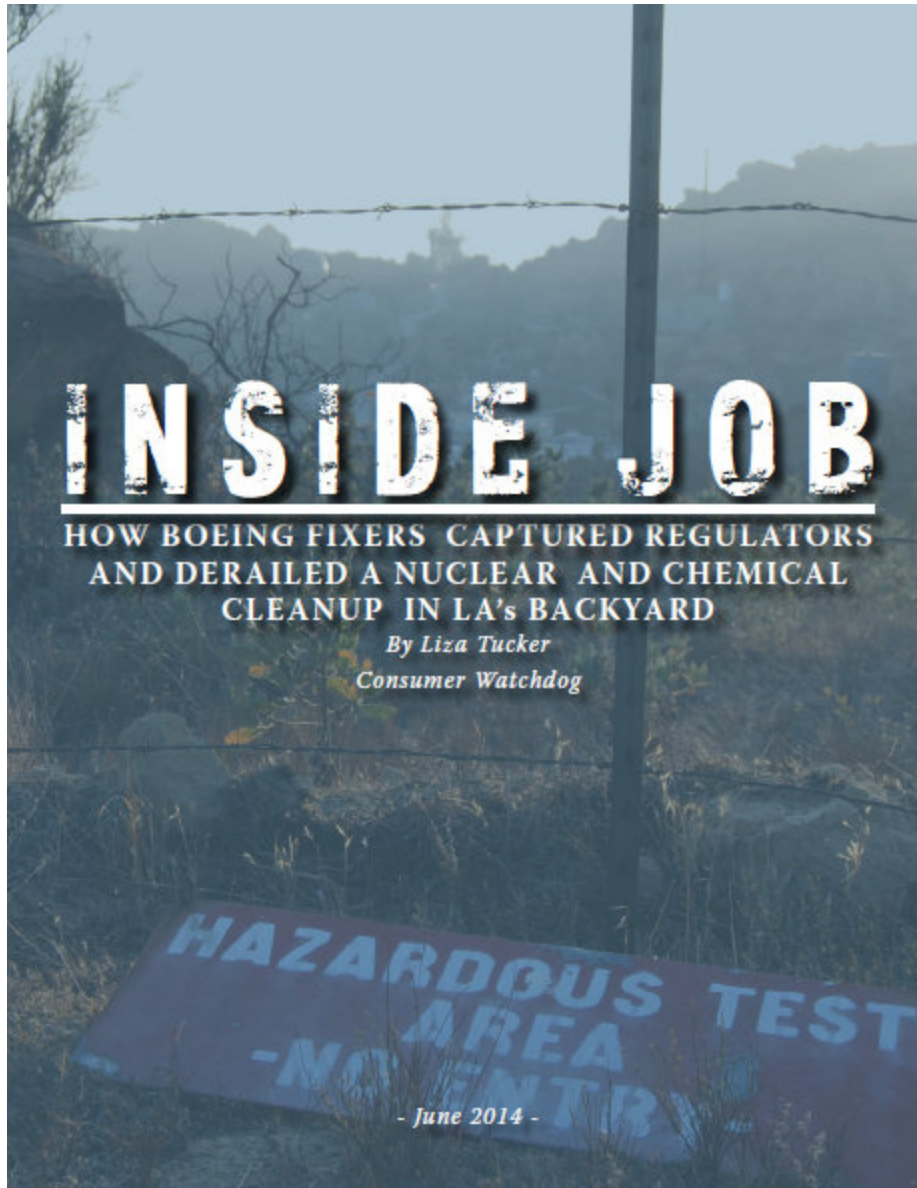
Any reason to suspect Boeing is getting preferential treatment?

# Charles Stringer

(Chair of LA Water Board )



- Charlie Stringer is both head of the LA Water Board and a Principal and General Counsel at Renewable Resources Group (RRG), a Los Angeles-based consulting firm.
- Boeing, the firm that stands to gain millions of dollars if the cleanup standards are weakened, has hired this firm.



- A major investigative report by Consumer Watchdog, INSIDE JOB, found Boeing's lobbyists and agents have a huge influence on regulatory agencies responsible for the cleanup.
- This report says Boeing hired this firm and Stringer in part to establish an "astroturf group," i.e., fake grassroots, to push Boeing's line that cleaning up the majority of the contamination at SSFL is a bad idea.

# Tracy Egoscue

(Former head of LA Water Board)



- Ms. Egoscue was Executive Director of the Water Board
- In 2010 she, along with Boeing's lawyer Pete Weiner, signed off on a deal with Boeing which set up smaller fines (called a Consent Decree).
- Shortly after the Consent Decree was signed she went to work for Boeing's lawyer Peter Weiner



What  
contaminant  
s have been  
found in the  
water?

# SSFL Water Pollution Exceedances

2008-2014 (First Quarter)

Contaminant	Number of Exceedances
Iron	33
Iron (Mass/Day)	3
Fluoride	1
Dioxin (TCDD-TEQ)	50
Dioxin (TCDD-TEQ) (Per Month)	6
Dioxin (TCDD-TEQ) (w/o DNQ values)	2
Dioxin (TCDD-TEQ) (Mass/Day)	8
Chloride	3
Zinc	3
Zinc (Per Month)	1
Nitrate as Nitrogen	1
Nitrate + Nitrite	2
Total Residual Chlorine	4
Total Residual Chlorine (Per Day)	2

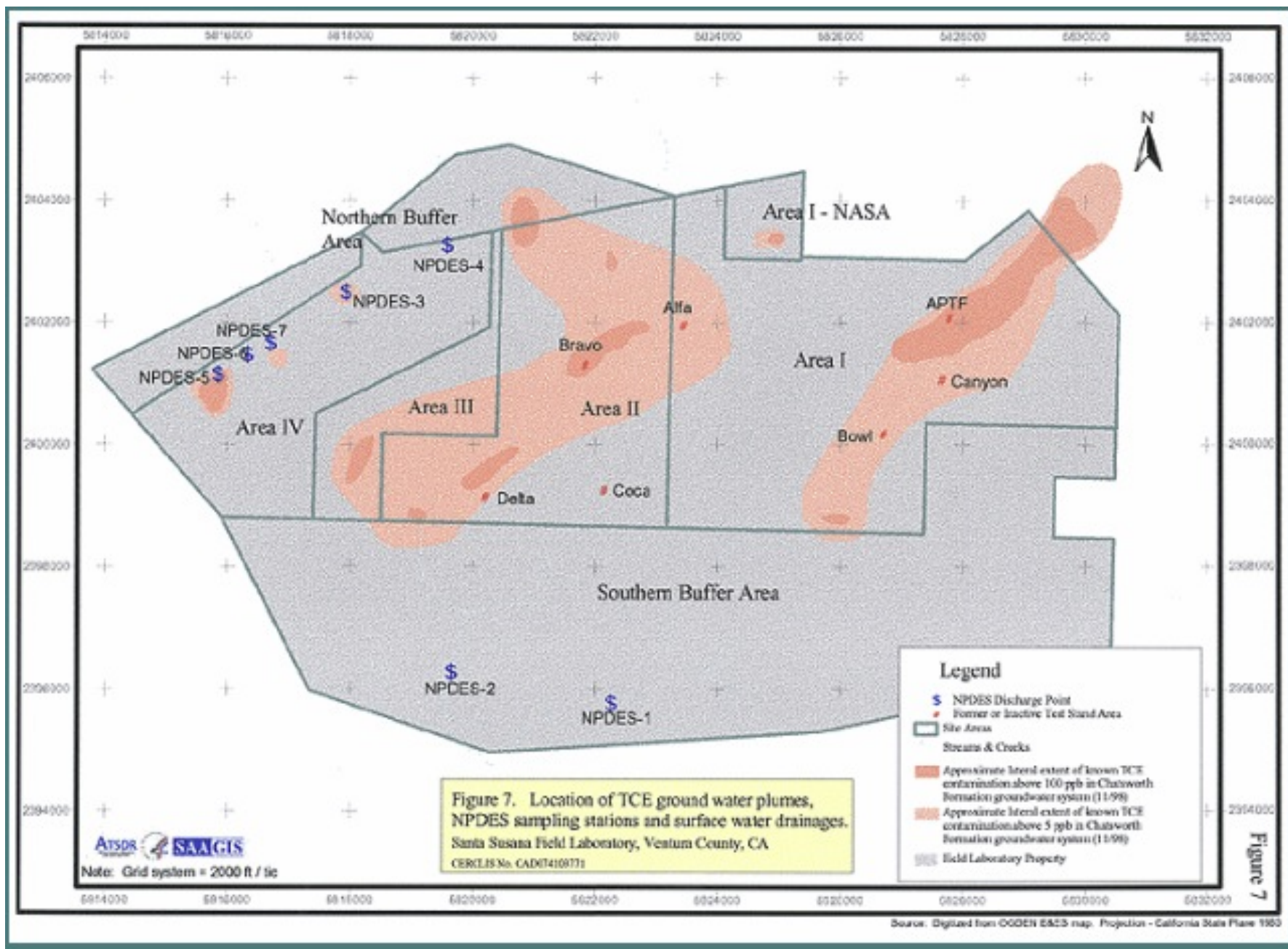
<b>Manganese</b>	<b>20</b>
<b>Lead</b>	<b>27</b>
<b>Lead (Per Month)</b>	<b>5</b>
<b>Bis Phthalate</b>	<b>1</b>
<b>pH (Field)</b>	<b>9</b>
<b>Chronic Toxicity</b>	<b>1</b>
<b>Cadmium</b>	<b>2</b>
<b>Copper</b>	<b>2</b>
<b>Copper (Per Month)</b>	<b>2</b>
<b>Chromium</b>	<b>1</b>
<b>Total Dissolved Solids</b>	<b>1</b>
<b>Gross Alpha</b>	<b>1</b>
<b>E. Coli</b>	<b>11</b>
<b>E. Coli Geometric Mean</b>	<b>3</b>
<b>Fecal Coliform</b>	<b>8</b>
<b>Fecal Coliform Geometric Mean</b>	<b>3</b>

**Total Exceedances: 216**





What about the ground water?



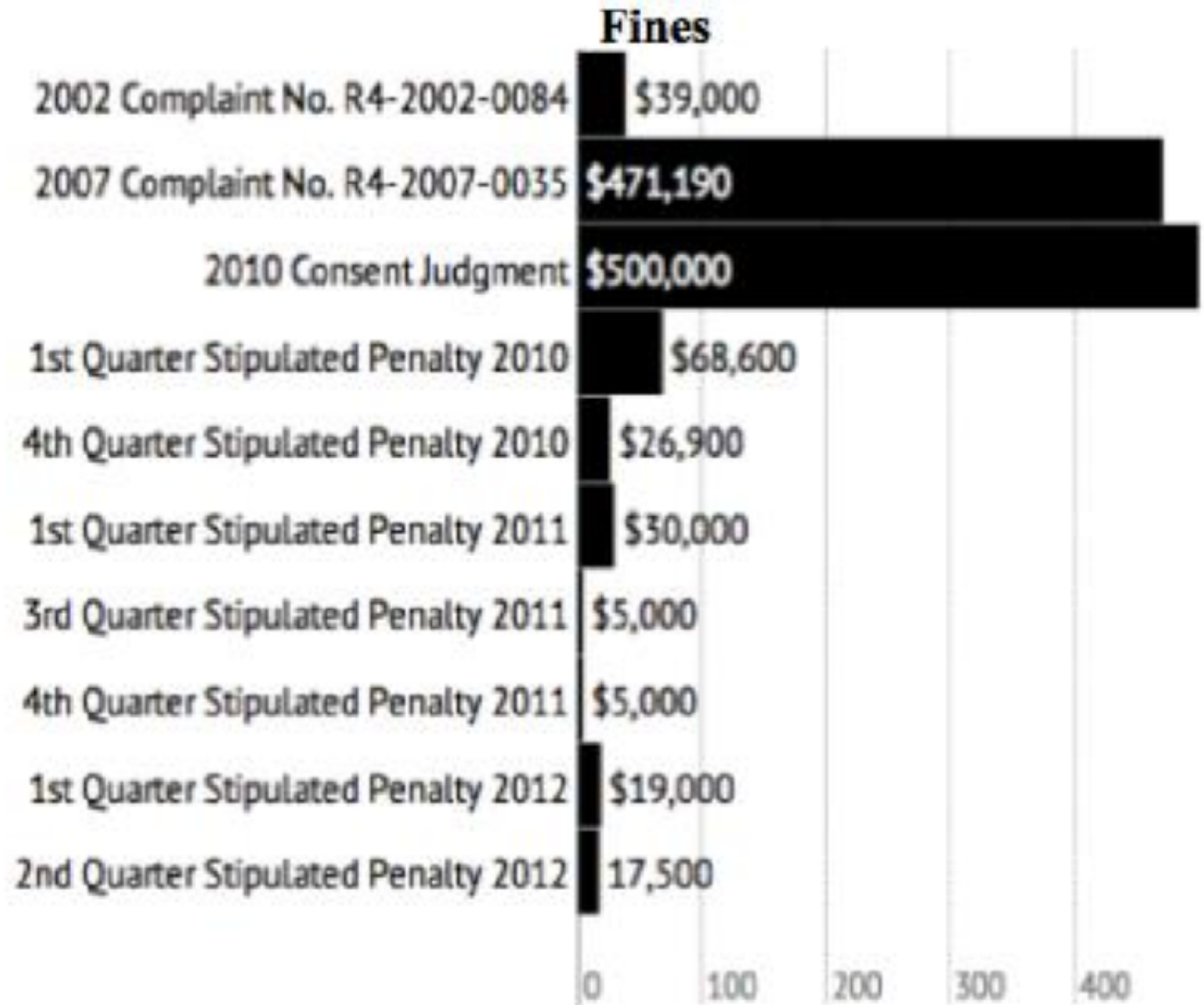
# What about perchlorate?

- Perchlorate has been found at the site of a proposed housing development in Dayton Canyon. Grading has begun.
- Perchlorate has been found in monitoring and drinking water wells in Simi Valley at levels above new state recommended limits.
- Perchlorate has been found leaving SSFL via Outfall 8 into Dayton Creek. Years ago perchlorate was found at the site of a proposed housing development at levels as high as 62 million parts per billion.

# Have the LA Water Board's efforts to enforce the regulations worked?

- The LA Water Board establishes fines to incentivize the polluter to clean up the source of the contamination.
- There isn't evidence to suggest their actions have been effective.

The fines total to  
about  
**\$1.2 Million**



Fines and other actions aren't deterring Boeing from allowing contaminated water to run into our communities.

- Boeing brings in \$80,000,000,000 per year.
- Boeing's fines average \$100,000 annually .
- That amount equates to one millionth of their revenue or which equates to about 6 cents for the average American family. Not much.

# Conclusion

- The new permit would subject our community until 2020 to a weaker permit than the existing weak permit.
- With the head of the LA Water Board also working for Boeing, there is reason to be concerned about undue influence.
- Contaminated water runs off the site an average of 35 times annually.
- Fines have not stopped Boeing from violating the permit.
- The public needs to be heard next week at the water board meeting.