

The Boeing Company
Santa Susana Field Laboratory
5800 Woodsey Canyon Road
Canoga Park, CA 91304-1146

Via Fedex

December 12, 2008
In reply refer to SHEA-108088

Mr. Norman E. Riley
SSFL Project Director
California Dept. of Toxic Substances Control
1001 "J" Street
P. O. Box 806
Sacramento, CA 95812-0806



Re: Submittal of Historical Documents
Group 2 RCRA Facility Investigation
Group 8 RCRA Facility Investigation
Santa Susana Field Laboratory, Ventura County

Dear Mr. Riley:

On behalf of and at the request of the United States National Aeronautic and Space Administration ("NASA"), The Boeing Company ("Boeing" or "the Company") is pleased to provide the Department of Toxic Substances Control ("DTSC") with historical records and documents related to the Group 2 RCRA Facility Investigation as part of the Santa Susana Field Laboratory ("SSFL") Corrective Action program, under the Consent Order for Corrective Action, Docket No. P3-07/08-003 ("Consent Order"), which governs this matter.

This submittal comprises, in electronic format, the historical records and documentation of activities associated with the Solid Waste Management Units ("SWMUs") and Areas of Concern ("AOCs") related to the Group 2 study area. In accordance with prior DTSC requests regarding the format of submissions of historical documents, this submittal is being transmitted to DTSC as described in the following table:

Group 2 HDMS Electronic Documents Deliverables Summary

Name	Organization	Deliverables	Purpose
Gerard Abrams	DTSC	2 Hard Drives	Document Review
Laura Rainey	DTSC	1 Hard Drive	Document Review
Tom Skaug	DTSC	1 Hard Drive	Document Review
Doug Sheeks	DTSC	1 Hard Drive	Document Review
Kasia Grisso	CH2M Hill	1 Hard Drive	Public Website Update

Preparing this submission has involved gathering and reviewing over a million documents reflecting activities that began five decades ago and spanned a period of over 50 years. SSFL documents are stored in a wide variety of locations and formats. It has required a considerable effort and time to collect the potentially relevant primary and supporting historical documents, sort and index them, review

them, and then capture them in electronic format, while ensuring that classified, proprietary or export controlled information is not inadvertently released.

Our search for Group 2 historical documents has involved a consultant technical team (CH2M Hill and Haley and Aldrich, Inc.) totaling 25 persons and numerous Boeing personnel. We have searched through department files, working files, consultant files and existing databases for relevant documents. We have expended over 2,800 person hours to conduct this review.



The Company believes that this effort demonstrates that it has conducted a reasonable search for the historical records relevant to the Group 2 study area as required by paragraph 3.4.7 of the Consent Order, and that the historical documentation submittal complies with the Consent Order. We have included in this submittal the primary historical records that list or describe any known chemicals stored, handled or released in the Group 2 study area, as well as historical information regarding the operations conducted in Group 2 study area and the types and sources of chemicals that may have been handled or released in the Group 2 study area. At the same time, given the sheer volume of documents that Boeing has reviewed, it is possible that additional responsive documents may exist that have not been identified. If any such documents are found, we will produce them promptly.

We have reviewed all documents for applicable legal privileges and have not submitted those documents that are covered by these privileges, in accordance with paragraph 3.4.5.3 of the Consent Order. We also have redacted information related to non-SSFL sites from certain documents because such information is not relevant to the Group 2 study area, as well as information pertaining to personnel matters and personal information and company financial data, where necessary.

Boeing has identified certain documents containing markings indicating that those documents may be classified under U.S. government programs as "SECRET" or "CONFIDENTIAL." Boeing continues to review these documents to confirm their status, to ensure that they are eligible for submission under paragraph 4.12 of the Consent Order. Upon receipt of any required government approvals to release these documents, they will be transmitted to DTSC in an addendum submittal.

Boeing has also identified historical documents containing information that may be restricted by U.S. export control laws, including the Arms Export Control Act (22 U.S.C. section 2751 *et seq.*), the International Traffic in Arms Regulations (22 C.F.R. Part 120), the U.S. Department of Commerce's Export Administration Regulations (15 C.F.R. Parts 730-774), and the U.S. Department of Energy's ("DOE") Foreign Atomic Energy Activities Regulations (10 C.F.R. Part 810). These documents are contained on the enclosed hard drives and DVDs in folders named "Potential Export Control," and the enclosed DVDs and the documents they contain are stamped accordingly. DTSC should be aware that transfer of information protected by the export control laws by any means to a foreign person whether in the United States or abroad without a valid export license or prior written approval from the Department of State, Department of Commerce, or other relevant federal agency is prohibited. Violation of these export control laws is subject to severe civil and criminal penalties.



Boeing has previously provided to DTSC hard copy transcripts of the deposition transcripts of fact witnesses pertaining to SSFL operations and waste management activities from lawsuits involving SSFL in which Boeing or Rockwell International is a party, in accordance with paragraph 3.4.5.1 of the consent order. Those transcripts are not being re-provided, and may contain information related to the Group 2 study area.

In addition to this Group 2 historical document submission, Boeing is including with this electronic submission an addendum to the Group 8 RFI historical documents. As discussed in my letter to you dated November 25, 2008, Boeing withdrew its claim of confidential business information ("CBI") from five (5) documents previously submitted in hard copy for Group 8. Those five documents are being re-submitted electronically with their protective CBI markings removed. Four (4) Group 8 documents submitted as CBI have been provided to DOE for further review as required by the markings on those documents and will be re-submitted electronically in a future addendum if cleared by DOE.

Boeing looks forward to continuing to work with you to ensure that the SSFL RCRA cleanup is completed in a timely and thorough manner. Should you have any questions, please contact Mr. Art Lenox at (818) 466-8795.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Signature:

Name:


Thomas D. Gallacher

Director, Santa Susana Field Laboratory

Title:

Environment, Health and Safety

Date:

December 12, 2008

ARB:bjc

Enclosure

cc:	Mr. James Pappas, DTSC	(w/o enclosure)
	Mr. Gerard Abrams, DTSC	(w/ enclosure)
	Ms. Laura Rainey, DTSC	(w/ enclosure)
	Mr. Tom Skaug, DTSC	(w/ enclosure)
	Mr. Doug Sheeks, DTSC	(w/ enclosure)
	SSFL Repository, DTSC Chatsworth	(w/o enclosure)
	Ms. Susan Houghton, DTSC Berkeley	(w/o enclosure)

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Mr. Thomas Johnson, DOE	(w/o enclosure)
Ms. Stephanie Jennings, DOE	(w/o enclosure)
Ms. Patricia Berry, DOE Oakland	(w/o enclosure)
Ms. Jill Bensen, CH2M Hill	(w/o enclosure)
Ms. Kasia Grisso, CH2MHill	(w/ enclosure)
Ms. Dixie Hambrick, MWH	(w/o enclosure)
Mr. Allen Elliott, NASA	(w/o enclosure)

