



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
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Gavin Newsom
Governor

Sent Via Electronic Mail

May 8, 2023

Mr. Michael Bower
The Boeing Company
5800 Woolsey Canyon Road
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Canoga Park, California 91304-1148
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DTSC AND REGIONAL WATER QUALITY CONTROL BOARD REVIEW OF THE
APRIL 6, 2023 FINAL PER-AND POLYFLUOROALKYL SUBSTANCES
INVESTIGATION WORK PLAN FOR THE BOEING RFI SUBAREAS,
SANTA SUSANA FIELD LABORATORY, VENTURA COUNTY, CALIFORNIA

Dear Mr. Bower:

The Department of Toxic Substances Control (DTSC) and Los Angeles Regional Water Quality Control Board (Regional Water Board) reviewed Boeing's April 6, 2023 Final Per-and Polyfluoroalkyl Substances (PFAS) Investigation Work Plan for the Boeing RFI Subareas, Santa Susana Field Laboratory (SSFL), Ventura County, California.

The work plan (1) summarizes the results of an evaluation conducted to determine whether evidence exists suggesting potential releases of PFAS or suspect materials (that is, substances that may contain PFAS) to the environment in the Boeing areas of SSFL, and (2) presents a proposed groundwater sampling and analysis plan (SAP) based on the results of this evaluation and technical guidance.

Based on the significant amount of rain received during the 2022-2023 rainy season and potential rising water table, DTSC recommends gauging the shallow wells in these areas to see if there is water and sampling those wells for PFAS if water is present. Additionally, the RCRA Facility Assessment Report dated 1994 calls out a spill for "Firex Overflow" on May 23, 1989 in the ECL laboratory area. It is recommended that sampling of a shallow well in this area such as SH-04 be included in the sampling program for PFAS.

Mr. Michael Bower
May 8, 2023
Page 2 of 2

DTSC SSFL Project Staff and the Regional Water Board approve the Work Plan for implementation. The Regional Water Board's review memo is attached.

If you have any questions, please contact me via email at Vlado.Arsov@dtsc.ca.gov or by telephone at (916) 255-3619.

Sincerely,



Vlado Arsov, PE
Santa Susana Field Laboratory Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

Attachment: Regional Water Board Memo

cc: (via email)

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Los Angeles Regional Water Quality Control Board

TO: Mindy Mathias, P.E.
Supervising Hazardous Substances Engineer
Department of Toxic Substances Control

FROM: For Susana Arredondo
Executive Officer

DATE: May 3, 2023

SUBJECT: COMMENTS TO THE FINAL PER-AND POLYFLUOROALKYL SUBSTANCES INVESTIGATION WORK PLAN FOR THE BOEING RFI SUBAREAS, SANTA SUSANA FIELD LABORATORY, VENTURA COUNTY, CALIFORNIA

The California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board) has reviewed the *Final Per-and Polyfluoroalkyl Substances (PFAS) Investigation Work Plan for the Boeing RFI Subareas, Santa Susana Field Laboratory, Ventura County, California* dated April 6, 2023 (Final PFAS Work Plan) prepared by Jacobs on behalf of The Boeing Company (Boeing) and submitted to the Department of Toxic Substances Control (DTSC). The following comments were prepared by Regional Water Board staff based upon review of the Final PFAS Work Plan as requested by the DTSC.

Boeing conducted an evaluation of historical document review databases previously prepared for the Boeing RFI Subareas to identify any reference to use of PFAS and suspect materials in the Boeing RFI Subareas. Based on the evaluation, Boeing proposes groundwater sample collection using existing groundwater monitoring wells in three areas of known aqueous film-forming foam (AFFF) storage or fire suppression demonstrations, and in seven areas where rocket engine test stands were historically located (specifically at the locations where surface runoff was collected). Areas of known AFFF storage or fire suppression demonstrations include: (1) Building 1319 where the fire engine and canister with AFFF were located (2) the Lower Lot where firefighting demonstrations were historically conducted, and (3) Former Fire Department Demonstration Area 4 in the Area 1 Burn Pit (AIBP) where firefighting demonstrations were historically conducted. Areas

NORMA CAMACHO, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

where rocket engine test stands were historically located include: (1) APTF, (2) LETF/CTL-I, (3) Canyon Test Stands, (4) Bowl Area, (5) CTL-III, (6) CTL-V, and (7) STL-IV.

Based on the review of information provided, Regional Water Board staff concurs with the proposed scope of work presented in the Final PFAS Work Plan.