

## Appendix P. Regulatory Oversight

The information summarized in this appendix comes primarily from a report titled “Perchlorate Source Evaluation and Technical Report, Santa Susana Field Laboratory, Ventura County, California,” prepared by MWG, Pasadena, California, for Rocketdyne, February 2003.

SSFL has conducted various environmental programs under the jurisdiction of several regulatory agencies. Because it is an active facility, there are four environmental programs at SSFL under the authority of the federal Resource Conservation and Recovery Act (RCRA). However, there are other federal, state, and county environmental programs. Both RCRA- and non-RCRA-related programs are described in the following sections.

### **P-1. Non-RCRA Programs**

Environmental programs not related to RCRA include environmental permitting (including air and surface water discharges), other types of site investigation, and closure activities. These programs, under the jurisdiction of various agencies, include the activities described below.

#### *Environmental Permitting*

SSFL is an active industrial facility with several types of environmental permits. Surface water discharge from SSFL is regulated under a National Pollutant Discharge Elimination System (NPDES) permit issued by the Regional Water Quality Control Board (RWQCB) in 1984. Surface water discharges from the site are monitored at eight outfall locations. Since 1998, approximately 2,400 laboratory analyses have been performed on over 200 samples collected from those outfalls. The RWQCB issued Waste Discharge Requirements (WDR) to regulate sewage and industrial waste discharge on site (i.e., non-hazardous leach fields). There are no longer any active sewage discharge or leach fields at SSFL, and the WDR permit was rescinded by the RWQCB in 1994. Air discharge permits and asbestos compliance permits are under the jurisdiction of the Ventura County Air Pollution Control District (VCAPCD). Regular emissions monitoring for carbon monoxide, nitrogen and sulfur oxides, reactive organic compounds, particulate matter, and radiological components is performed at SSFL in compliance with these permits. In addition, lead and asbestos abatement work at the facility is done under permits issued by the VCAPCD and/or California Occupational Safety and Health Administration.

#### *Landfills*

Non-hazardous solid waste landfills are regulated by the RWQCB and the Ventura County Environmental Health Division (VCEHD). Currently, SSFL has two inactive non-hazardous landfills, which are inspected quarterly by VCEHD. These landfills are to be investigated as part of the RCRA Corrective Action Program under the oversight of the California EPA’s Department of Toxic Substances Control (DTSC), RWQCB, and VCEHD. There are no designated hazardous waste landfills at SSFL.

### *Fuel Tank Investigation/Closure*

Two tank investigation programs are being conducted at SSFL. The underground storage tank (UST) program includes soil investigation and cleanup associated with fuel USTs at SSFL; fuel UST closures were under the jurisdiction of VCEHD. VCEHD transferred oversight and closure of fuel USTs at SSFL to DTSC as part of the ongoing RCRA Corrective Action Program.

### *Mixed and Radioactive Waste Monitoring and Closure Activities*

Radioactive materials have been used in Area IV of SSFL. The only remaining nuclear-related activity at SSFL is decontamination and decommissioning of former nuclear facilities. DOE owns some buildings and equipment in Area IV and has primary jurisdiction over monitoring radioactive materials in this area. The California Department of Health Services' Radiologic Health Branch (DHS-RHB) oversees Boeing's Radioactive Materials License, radioactive facility cleanup, and environmental monitoring. Solid Waste Management Units (SWMUs) identified in the RCRA Facility Assessment (RFA) with potential radioactive contamination (SAIC, 1994) are being addressed by the DOE site closure programs. Potential chemical contamination at these sites is being addressed under the RFI under the DTSC oversight.

## **P-2. RCRA Programs**

The RCRA-related activities include four major environmental programs at SSFL, all under the oversight and jurisdiction of DTSC.

### *Groundwater Characterization and Remediation*

This ongoing program consists of groundwater monitoring and remediation. Approximately 381 wells, springs, and shallow piezometers are included in the monitoring program. As part of the site characterization program, Boeing monitors groundwater in these wells according to the DTSC-approved groundwater monitoring plan. To date, approximately 12,000 chemical analyses have been performed on over 7,800 samples collected from groundwater wells. Groundwater monitoring and remediation are also performed in support of the surface impoundment Post-Closure Permits. Thirty-two of the onsite wells serve as extraction wells for the eight RCRA-permitted groundwater treatment systems (GWTS). Three of the GWTS are on standby. Effluent sampling at the GWTS locations has been conducted since 1986. To date, approximately 6,900 samples have been collected under the auspices of this program. These samples have been analyzed for volatile organic compounds, but also for perchlorate at three of the treatment systems.

### *RCRA Corrective Action*

This program includes the RFA, RCRA facility investigation (RFI), corrective measures study, and corrective measures implementation phases. The RCRA Corrective Action Program at SSFL is being conducted in response to requirements specified in three Hazardous Waste Facility

Permits issued to Boeing by the DTSC. The three permits governing the RCRA Corrective Action Program at SSFL are (1) the Areas I and III Post-Closure Permit issued in 1995, (2) the Area II Post-Closure Permit issued in 1995, and (3) the Area IV Hazardous Waste Management Facility Operating Permit issued in 1993.

The first phase of the RCRA Corrective Action process, the RFA, was conducted for the U.S. Environmental Protection Agency (EPA) in 1989 by SAIC (1994). This program identified 122 SWMUs and areas of concern at SSFL. These include units at SSFL that have used, stored, or handled various hazardous materials. Since 1984, approximately 16,500 laboratory analyses have been performed on over 8,300 samples collected from surficial media. RFI reports presenting these data and evaluating potential risks to human health and the environment will be submitted to DTSC review.

#### *Closure of Inactive RCRA Units*

This program includes the closure of 12 units used to manage RCRA-regulated wastes. These units include 10 surface impoundments, a polychlorinated biphenyls (PCB) storage area, and a hazardous waste storage area. Nine of the surface impoundment have been issued Post-Closure Permits administered by DTSC. Two Post-Closure Permits have been issued for the surface impoundments at SSFL. The first applies to five Boeing impoundments in Areas I and III, and the second to four NASA impoundments in Area II. These Post-Closure Permits were finalized and issued to Boeing in May 1995. One of the surface impoundments has been closed without requiring post-closure care.

#### *Compliance/Permitting of RCRA Units*

This program includes the permitting and compliance of active and inactive RCRA-regulated units at SSFL, including storage areas and waste disposal practices. The three current permits issued by DTSC for active RCRA facilities at SSFL include the Areas I and III Post-Closure Permit and the Area II Post-Closure Permit for groundwater treatment system operations, and the Operating Permit for the Area IV Hazardous Waste Management Facility. Interim status authorization has also been issued to Boeing by DTSC to operate the DOE-owned Area IV Radioactive Materials Handling Facility.