The Boeing Company Santa Susana Field Laboratory 5800 Woolsey Canyon Road Canoga Park, CA 91304-1148

Certified Mail

April 7, 2010 In reply refer to SHEA-109785



Regional Water Quality Control Board Los Angeles Region 320 West 4th Street, Suite 200 Los Angeles, CA 90013

Attention: Ms. Cassandra Owens

Subject: Intent to initiate ISRA actions at ELV in accordance with the

Final Interim Source Removal Action (ISRA) Work Plan California Water Code §13304 Order (NPDES No. CA0001309

CI No. 1111, Site ID No. 2040109)

Dear Ms. Owens:

In accordance with the referenced order dated December 3, 2008, The Boeing Company (Boeing), on behalf of Boeing and the National Aeronautics and Space Administration (NASA), previously submitted and obtained approval to perform ISRA actions designated as ELV-1C and ELV-1D. Pursuant to an October 5, 2009 email from the Regional Water Quality Control Board, the removal action at these locations has not proceeded pending identification of waste disposal facilities for the excavated soils.

At this time, Boeing, on behalf of NASA, has obtained approved profiles for these soils at permitted Transportation, Storage, Disposal Facilities [TSDF] that have the appropriate permits for and will accept the waste generated by the ELV ISRA action. The facilities are located outside the State of California.

Attached is the revised Transportation Plan and ELV Soil Management Plan indicating that the permitted TSDFs outside the State of California where soils will be transported to and disposed of are to be in compliance with 40 CFR 264.12.

On September 29, 2009, NASA representatives met with the DTSC on-site to identify potential future DTSC sampling locations adjacent to the ELV ISRA area. These locations have been marked and will not be disturbed during the ISRA action to preserve the ability to conduct future sampling if required.

Ms. C. Owens, RWQCB (SHEA-109785) April 7, 2010 Page 2

As a result of obtaining the acceptance for disposal of the ELV soils at the out-of-state permitted TSDF, NASA will begin field work starting April 19, 2010. All field work will be performed in compliance with the approved May 1, 2009 ISRA Work Plan and conducted under the oversight of RWQCB personnel.

If there are any questions, please contact Ms. Lori Blair at (818) 466-8741.

Sincerely,

BOEING

Thomas D. Gallacher

Director, Santa Susana Field Laboratory

Environment, Health and Safety

LB:bjc

Attachments:

1. Revised ISRA Transportation Plan, April 2010

2. Revised ELV Soil Management Plan

Cc: Ms. Tracy Egoscue, RWQCB

Mr. Peter Raftery, RWQCB

Mr. Allen Elliot, NASA

Mr. Steve Slaten, NASA

Mr. Mark Malinowski, DTSC

Mr. Buck King, DTSC

The Boeing Company
Santa Susana Field Laboratory
5800 Woolsey Canyon Road
Canoga Park, CA 91304-1148

Certified Mail

April 7, 2010 In reply refer to SHEA- 109784

Regional Water Quality Control Board Los Angeles Region 320 W. 4th Street, Suite 200 Los Angeles, CA 90013

Attention: Ms. Tracy Egoscue

Subject: Characterization, Management, and Disposal Plan for Soils Excavated

from Interim Source Removal Action (ISRA) Areas ELV-1C and ELV-1D,

California Water Code Section 13304 Order,

The Boeing Company, Santa Susana Field Laboratory, Canoga Park, CA (NPDES

NO. CA0001309, CI NO. 6027, SCP NO. 1111, SITE ID NO. 2040109)

Dear Ms. Egoscue:

Pursuant to a verbal request made by Los Angeles Regional Water Quality Control Board (RWQCB) staff on September 10, 2009, on September 24, 2009 The Boeing Company (Boeing) on behalf of the National Aeronautic Space Administration (NASA) submitted a soil management plan for the Interim Source Removal Action (ISRA) Areas ELV-1C and ELV-1D to the RWQCB. This letter serves to revise the soil management plan for soils excavated from Interim Source Removal Action (ISRA) areas ELV-1C and ELV-1D located on federal property administered by NASA within Outfall 009.

Interim Source Removal Actions, including those at the ELV-1C and ELV-1D, are being performed to address potential soil sources of constituents that exceeded NPDES permit limits and benchmarks at Outfalls 008 and 009 pursuant to a California Water Code Section 13304 Cleanup and Abatement Order (CAO) issued by the Los Angeles RWQCB dated December 3, 2008. The ISRA project is an interim cleanup action under RWQCB oversight; final remedial requirements for the SSFL, including the Outfall 008 and 009 areas, will be addressed as part of RCRA Corrective Action project under oversight of the Department of Toxic Substances Control (DTSC).

The Final ISRA Work Plan, submitted to the RWQCB in May 2009 per the CAO, identified the ISRA constituents of concern (COCs) at the ELV-1C as dioxins and at ELV-1D as cadmium, copper, dioxins, lead, and mercury. The work plan identified excavation and offsite disposal as the recommended remedial alternative for these two areas.

In order to characterize the soil for offsite disposal, *in situ* waste characterization sampling (chemical and radiological) has been performed per the Final ISRA Work Plan. Waste characterization samples were collected, contained, and handled according to requirements in SW-846, including sampling at randomly selected locations and depths. Chemical and radiological waste characterization data and certifications are available on the Boeing website (http://www.boeing.com/aboutus/environment/santa_susana/isra.html).



Ms. T. Egoscue, RWQCB (SHEA-109784) April 7, 2010 Page 2

Based on the *in situ* waste characterization results, the ELV ISRA areas will be segregated and managed in accordance with the ISRA Soil Management Plan and Addenda. Five waste characterization samples collected within the planned ELV-1C excavation and three waste characterization samples collected within the planned ELV-1D excavation slightly exceeded the current, local background comparison concentration for cesium 137. All other radionuclides analyzed are either non-detect or consistent with current, local background concentrations. It should be noted that the USEPA is in the process of establishing soil background levels for radionuclides (including cesium 137). Radionuclides are not ISRA COCs identified in the CAO, and therefore, the cesium 137 results do not affect the planned ELV-1C and ELV-1D excavation footprints. Additional investigation of the cesium 137, if warranted, will be addressed under DTSC oversight as part of the RCRA Corrective Action Program.

Boeing and NASA worked closely with the California Department of Public Health (CDPH) to confirm that the ISRA ELV soils that contain cesium 137 above background levels can be disposed of at a California Class I or II landfill. Per the attached correspondence from CDPH, these soils do meet Class I or II landfill permit requirements, and we plan to dispose of all ELV-1C and ELV-1D excavated soils at Waste Management's Kettleman Hills Class I Landfill or an alternate Out-of-State RCRA Part B Transportation, Storage, Disposal Facility [TSDF] that has the appropriate permit(s) for, and will accept, the waste per 40 CFR 264.12.

We understand the handling and disposal procedures of these soils are of interest to both the RWQCB and DTSC; if you have any questions or require anything further, please contact me at 818-466-8161, or Art Lenox at 818-466-8795. Boeing and NASA will consider this approach acceptable for project implementation if no further questions or requirements are indicated by the RWQCB staff. Thank you for your attention to this information.

Sincerely,

Mr. Thomas D. Gallacher

Director, Santa Susana Field Laboratory

Environment, Health and Safety

LB:bjc

Attachments:

1 - Figure 1 - ELV-1C and ELV 1D Location

2 - September 24, 2009, California Department of Public Health letter

cc: Cassandra Owens, RWQCB

Peter Raftery, RWQCB

Mark Malinowski, DTSC

Buck King, DTSC

Steve Slaten, NASA

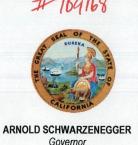
Allen Elliott, NASA



ISRA Excavation Area Outfall 009 Base Map Legend Administrative Area Boundary RFI Site Boundary Existing Building or Structure Excavation Area Surface Water Drainage Surface Water Divide Outfall Water Divide NPDES Outfall Elevation Contour ELV-1C S U S A N A F I E L D **MWH** FIGURE --S A N T A LABORATORY



State of California—Health and Human Services Agency California Department of Public Health



September 24, 2009

Mr. Phil Rutherford, Manager Health, Safety & Radiation Service The Boeing Company Santa Susana Field Laboratory 5800 Woolsey Canyon Road, Canoga Park, CA 91304-1148

Dear Mr. Rutherford,

In response to your letter dated September 11, 2009, regarding SHEA-109081, disposal of IRSA outfall 009 soil to a Class 1 or 2 hazardous waste landfill. California Department of Public Health, Radiologic Health Branch (RHB) has reviewed the analysis provided in the attachment and finds the proposal does not represent a public health threat and meets the criteria of the Executive Order D-62-02.

Therefore; RHB concurs with your finding to send the material to either a Class 1 or Class 2 landfill.

If you have any questions, please contact me at (916) 440-7942.

Sincerely,

Gary W. Butner, Chief Radiologic Health Branch

ano

CC:

James M. Passas, DTSC Samuel Unger, RWQCB Cassandra Owens RWQCB William Chi, CDPH-OLS Peter Sapunor, CDPH-OLS

INTERIM SOURCE REMOVAL ACTION (ISRA) TRANSPORTATION PLAN SANTA SUSANA FIELD LABORATORY VENTURA COUNTY, CALIFORNIA

April 2010

Prepared For:

THE BOEING COMPANY

and

THE NATIONAL AERONAUTICS AND SPACE ADMINISTRATION

Prepared By: MWH 618 Michillinda Avenue Suite 200 Arcadia, California 91007

Ben Stewart, P.G. No. 8012

Project Geologist

Alex Fischl, P.M.P. Project Manager

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ABBREVIATIONS AND ACRONYMS

Boeing The Boeing Company

CAO Cleanup and Abatement Order
CFR Code of Federal Regulations

cy cubic yards

DOT Department of Transportation

DTSC Department of Toxic Substances Control

ELV Expendable Launch Vehicle

fwy freeway

HSP health and safety plan

ISRA Interim Source Removal Action

NASA National Aeronautics and Space Administration

NPDES National Pollutant Discharge Elimination System

PEA preliminary evaluation area

RCRA Resource Conservation and Recovery Act

RFI RCRA Facility Investigation

RWQCB Los Angeles Regional Water Quality Control Board

SMP Soil Management Plan

SSFL Santa Susana Field Laboratory





1.0 INTRODUCTION

This Transportation Plan was prepared to support implementation of the Interim Source Removal Action (ISRA) at the Santa Susana Field Laboratory (SSFL), Ventura County, California. Details of the ISRA implementation effort that this Transportation Plan supports were described in the Final ISRA Work Plan prepared by MWH Americas, Inc. (MWH) (MWH, 2009b). This Transportation Plan was prepared by MWH on behalf of The Boeing Company (Boeing) and the National Aeronautics and Space Administration (NASA).

This Transportation Plan outlines proposed Interim Source Removal Action (ISRA) transportation activities to be completed by Boeing in Areas I and II at and near the Canyon, Happy Valley South (HVS), and Expendable Launch Vehicle (ELV) areas.

1.1 PROJECT BACKGROUND

The SSFL is located approximately 29 miles northwest of downtown Los Angeles, California, in the southeast corner of Ventura County. Figure 1 shows the geographic location and property boundaries of the SSFL, as well as surrounding communities.

Stormwater discharges from the SSFL are currently regulated by National Pollution Discharge Elimination System (NPDES) permit number R4-2007-0055 issued by the Los Angeles Regional Water Quality Control Board (RWQCB), and are monitored at 15 Outfalls. On December 3, 2008, the RWQCB issued a California Water Code Section 13304 Cleanup and Abatement Order (CAO) requiring an ISRA for Outfalls 008 and 009. The CAO was issued by the RWQCB in order to achieve compliance with the Waste Discharge Requirements (WDR) for Outfalls 008 and 009 contained in Order No. R4-2004-0111, as amended by Orders No. R4-2006-0008, R4-2006-0036, and R4-2007-0055. A Final ISRA Work Plan was submitted to the RWQCB on May 1, 2009, that detailed the ISRA area identification and remedial planning process for these Outfalls (MWH, 2009b). Remedial actions consist of excavation, offsite transportation, and disposal of impacted soil; re-contouring and re-vegetation of disturbed areas; and soil confirmation sampling.



Investigation of chemical contamination in soil, groundwater, and related media (e.g., soil vapor, weathered bedrock) at the SSFL is also being conducted under the Resource Conservation and Recovery Act (RCRA) Corrective Action Program regulated by the Department of Toxic Substances Control (DTSC). The RCRA program at the SSFL is currently in the RCRA Facility Investigation (RFI) phase, with much of the investigative sampling complete and RFI reports being prepared. Although some of this sampling and analysis is ongoing, substantial data have already been collected in many of the planned ISRA Areas. Additional sampling in the ISRA preliminary excavation areas (PEAs) that were identified in the Preliminary ISRA Work Plan (MWH, 2009a) is currently ongoing to further define impacted soil areas for ISRA implementation in 2010 and 2011.

Remedial actions at Happy Valley within Outfall 008 watershed and at ELV within Outfall 009 watershed are scheduled for activity in 2009, and remedial actions at other areas within Outfall 009 are scheduled for activity in 2010 and 2011.

1.2 ISRA EXCAVATION DESCRIPTION

There are a total of nine excavation areas planned for 2009: seven excavation areas in the Outfall 008 watershed (HVS-1, HVS-2A, HVS-2B, HVS-2C, HVS-3, CYN-1, DRG-1) and two excavation areas in the Outfall 009 watershed (ELV-1C and ELV-1D). Impacted soil from the excavation areas will be removed by a backhoe, front-end loader, vacuum truck, and hand tools. The removal, transportation, and disposal activities will be performed in accordance with applicable federal, state, and local laws, regulations, and ordinances.

1.3 PURPOSE AND OBJECTIVE

The purpose of this Transportation Plan is to identify and minimize potential health, safety, and environmental risks that may result during loading; SSFL entry and egress; and during transportation of waste on public roads. The Transportation Plan as well as the required Contingency Plan Section will be used as a stand-alone document by personnel involved in the transportation of the excavated soil.



As stated above, ISRA implementation is defined for 2009 activities for which this Transportation Plan has been prepared. Future 2010 and 2011 ISRA activities will be documented in ISRA Work Plan Addenda for RWQCB review and approval. Therefore, this Transportation Plan and Contingency Plan Section will be updated as warranted once future ISRA activities are defined to provide stand alone documents for personnel involved in the transportation of excavated soil.





2.0 WASTE CHARACTERIZATION AND QUANTITY

The estimated *ex situ* excavated soil volume from ISRA Areas in 2009 is approximately 7,610 cubic yards (cy) (MWH, 2009b). This volume was estimated based on an evaluation of data from RFI and ISRA sampling efforts.

2.1 ESTIMATED WASTE QUANTITY

The total volume of *ex situ* excavated soil is approximated at 7,610 cy, or approximately 690 truck loads, assuming an average truck load of 11 cy and no bulking. Because adjustments to the limits of removal may be warranted based on confirmation sampling, volumes are estimates and do not include potential additional soil removal that may be necessary in order to meet the post-removal goals of the ISRA Final Work Plan (MWH, 2009b).

2.2 WASTE PROFILING

Waste profiling will be largely determined by reviewing analytical results from *in situ* soil samples previously collected within each planned excavation area (historical samples obtained as part of ongoing RFI activities, and pre-excavation ISRA data gap samples). For any further waste characterization, *ex situ* soil samples may be collected from stockpiled waste soil, but this is expected to be minimal. Soil will be classified in accordance with regulations described in California Code of Regulations, Title 22, and Sections 66261.21 to 66261.24. Waste soil characterization analytical results will be submitted to the appropriate disposal facilities for approval and disposal of waste. Once approval from the disposal facility is obtained, the waste will be handled and transported to the disposal facility. All generated wastes will be sampled, analyzed, and managed in accordance with CCR Title 22, Division 4.5.

Based on the chemical analysis, it is anticipated that the soil will be classified as non-hazardous waste. However, the dry, ephemeral pond sediments from ISRA Area ELV-1D may be hazardous waste and will be handled separately pending any additional waste characterization data deemed necessary.





3.0 WASTE STAGING OPERATIONS

It is anticipated that most of the removed soil will be temporarily stockpiled onsite before being loaded for transport to a disposal facility. Soil excavated from the Outfall 008 ISRA areas will be loaded directly into haul trucks and transported to a temporary stockpile location at the Lower Parking Lot near the SSFL facility entrance. Soil excavated from the Outfall 009 ISRA areas will be stockpiled at the parking lot adjacent to the helipad, located west of excavation areas ELV-1C and ELV-1D. Any soil anticipated to exceed hazardous waste levels will be segregated and managed separately. Soil that is not promptly loaded for transport to a disposal facility will be stored per the Soils Management Plan (SMP) (MWH, 2009c).





4.0 REQUIREMENTS OF TRANSPORTERS

A transporter or combination of transporters will be selected prior to the implementation of this Transportation Plan. The selected transporters will be qualified, fully licensed, and insured to transport the wastes generated. For transportation of hazardous wastes, if necessary, the selected transporter will be a registered hazardous waste hauler.

The soil will be transported in bulk, using 10-wheel end dump trucks, or equivalent, each with a capacity of 15 to 18 tons of material. Prior to leaving the SSFL, non-hazardous waste will be covered and secured with a tarp completely extending over the truck bed. RCRA or California-hazardous wastes, if encountered, will be placed in labeled, Department of Transportation (DOT)-approved, 20-cy transport bins or other DOT-approved containers and transported by appropriate truck.





5.0 TRAFFIC CONTROL PROCEDURES

The plan is to dispatch trucks to and from the SSFL at set intervals to avoid traffic problems along Woolsey Canyon Road, the significant local traffic bottleneck. Between 7 a.m. to 9 a.m. and 4 p.m. to 7 p.m., trucks traveling on City of Los Angeles streets will be staggered at a minimum of 15 minute intervals. For other periods, the interval will be approximately 10 minutes. Although truck drivers will be instructed to approach the SSFL at the prescribed intervals, there is always the possibility that some trucks will approach the SSFL ahead of time.

Upon entrance, each truck driver will make a temporary stop at the facility entrance at the end of Woolsey Canyon Road. The driver will park the truck at an area designated by the security guards. The security guard will issue a temporary pass permit to the driver and authorize the truck entry to the facility. The driver will proceed to the loading area following the posted signs. While at the SSFL, vehicles will be required to maintain slow speeds for safety purposes and for dust control measures. Upon exit of the SSFL, each driver will again temporarily stop at the facility control point to relinquish the temporary pass permit to facility personnel.

No more than 20 trucks will arrive and leave the SSFL on the same day. At any time, approximately four to five trucks may be staged at the loading area of the Lower Parking Lot or in the ELV staging area near the helipad. Excess trucks will use available parking space at SSFL.





6.0 TRUCK LOADING OPERATIONS

Transportation trucks will be loaded at stockpile staging areas, which are anticipated to be at the Lower Parking Lot (Outfall 008) and the helipad near the ELV (Outfall 009) (Figure 2).

Gentle loading will be performed to minimize the potential for spill or dust creation. Water spraying will be implemented as needed to suppress potential dust generation during loading operations. Care will be taken to apply dust suppression water to the top of the load or source material to avoid wetting the truck tires. Loading will not be performed during unfavorable weather conditions (i.e., high winds or storms). Any material that is spilled during loading will be collected for subsequent loading. After loading, trucks will then pass through the decontamination and inspection station prior to weighing and departure from the SSFL. Trucks will be decontaminated by dry-brushing prior to leaving the staging/loading areas to prevent track out. Material from the decontamination of the trucks will be collected and hauled out with the last load of soil.

Transported material will be covered prior to leaving the SSFL property. Trucks will be inspected before leaving the SSFL. The inspection will include visual checking of tire conditions, brake pads, latches, properly-secured covering, decontamination, placarding, and hauling documents (manifests). The inspection results will be logged in the daily construction logs.





7.0 SHIPMENT DOCUMENTATION

The characteristics of the waste will be determined prior to transportation offsite. A copy of the shipping document for each truckload will be maintained onsite until completion of waste transportation operations.

7.1 NON-HAZARDOUS WASTE SHIPMENT

For material characterized as non-hazardous waste, the truck driver will be handed a non-hazardous waste manifest or bill of lading. After loading the truck, a Boeing representative and the driver will sign the non-hazardous waste manifest. A generator's copy will be retained by the transportation manager for logging and tracking purposes. At a minimum, the manifest will include the following information:

- Name and Address of Waste Generator;
- Name and Address of Waste Transporter;
- Name and Address of Disposal Facility;
- Description of the Waste; and
- Quantity of Waste Shipped.

7.2 HAZARDOUS WASTE SHIPMENT

For material that is categorized as a hazardous waste, a manifest of hazardous waste will be prepared for each truck, based on analytical data and the landfill approval profile sheet. After loading the truck, a Boeing representative and the driver will sign the manifest. The generator's copy (yellow) and the DTSC's copy (blue) will be removed from the manifest package, by the transportation manager, for logging and tracking purposes. The balance of the manifest sheets will be handed over to the driver to accompany the shipment of the waste to the landfill facility. At a minimum, the manifest document will include the following information:

- Name and Address of Waste Generator;
- Name and Address of Waste Transporter;
- Name and Address of Disposal Facility;
- Description of the Waste; and
- Quantity of Waste Shipped.





8.0 TRANSPORTATION ROUTES

Transportation of wastes will occur on arterial streets and/or freeways (Fwys), approved for truck traffic, to minimize any potential impact on the local neighborhoods. The onsite truck route, primary offsite truck routes, and alternate offsite truck routes are described in detail below.

8.1 ONSITE TRUCK ROUTE

Onsite truck routes from the Happy Valley Area and ELV Area excavation sites to stockpile areas, from stockpile areas to scale, and from scales to the SSFL Gate are shown on Figure 3 and described below.

Happy Valley Area. Onsite haul trucks transporting soil from Happy Valley excavation sites to the Outfall 008 stockpile staging area will proceed from Happy Valley on the gravel road and head west toward the Canyon area, continue west on Canyon Road, turn right onto Area I Road, and turn left into the Lower Parking Lot. Offsite disposal trucks loading in the Lower Parking Lot will travel west on the Area II Service Road towards the scales. At the scales, trucks will receive a manifest for the load, at which point they will travel east on the Area II Service Road and exist through the SSFL gate.

ELV Area. Onsite haul trucks transporting soil from ELV excavation sites to the Outfall 009 stockpile staging area will travel southwest to the helipad area. Offsite disposal trucks loading in at the helipad will travel north east, turn right on helipad road, turn left on Area II Service Road, and travel east on Area II Service Road towards the scales (Figure 3). At the scales, trucks will receive a manifest for the load, at which point they will travel east on the Area II Service Road and exist through the SSFL gate.

8.2 PRIMARY OFFSITE TRUCK ROUTE

Once offhaul trucks leave SSFL, the primary route to the various facilities will be based on reaching the Ronald Reagan 118 Fwy.

Primary Route to the 118 Fwy



From the SSFL gate, vehicles will turn right (east) onto Woolsey Canyon Road, turn right (south) onto Valley Circle Boulevard, turn left (west) onto Roscoe Boulevard, and turn left (north) onto Topanga Canyon Boulevard (Figure 4). The entrance to the 118 Fwy is on Topanga Canyon Boulevard.

Route to Antelope Valley and Lancaster Recycle and Disposal Facilities

Vehicles will go east on the 118 Fwy, merge north onto on San Diego Fwy 405 followed by I-5, and then east on the 14 Fwy (Figure 5). Vehicles in route to Antelope Valley Recycle and Disposal Facility will exit and proceed west on W. Avenue S, turn right (north) onto Tierra Subida Ave, and proceed approximately 0.6 miles to the facility entrance. Vehicles in route to Lancaster Recycle and Disposal Facility will exit and proceed east on Avenue G, turn left (north) onto Division St., turn right (east) on E. Avenue F, and proceed approximately 0.7 miles to the facility entrance.

Route to Chemical Waste Management – Kettleman Hills Facility

Vehicles will go east on the 118 Fwy, north on San Diego Fwy 405, north on I-5 to Kettleman Hills, south on Skyline Boulevard, and finally left on Old Skyline Road (Figure 6). The landfill is located at 35251 Old Skyline Road, Kettleman Hills.

Route to Clean Harbors – Buttonwillow, California Facility

Vehicles will go east on the 118 Freeway for approximately 7.2 miles then north on the 405 Freeway for approximately 3.1 miles and continue north on the 5 for approximately 98.6 miles. Vehicles will take exit 257 toward McKittrick/Buttonwillow/State Highway 58 and will merge onto Tracey Avenue. Vehicles will turn right onto California State Highway 58 (CA-58) and proceed approximately 8 miles to Lokern Road. Vehicles will turn right onto Lokern Road and proceed into the facility (Figure 7).

8.3 ALTERNATE OFFSITE TRUCK ROUTE

The 101 and 405 Fwy can be used to reach necessary Fwys instead of the 118 Fwy. This alternate route is not recommended because traffic on the 101 Fwy is usually heavier than on the



118 Fwy. Another alternate route is to access the 118 Fwy from De Soto Avenue instead of Topanga Canyon Boulevard.

8.4 TRUCK ROUTES TO ALTERNATE OUT-OF-STATE FACILITIES

Trucks will utilize routes posted by Cal-Trans as acceptable routes for the transportation of hazardous waste when shipping waste to an out-of-state disposal facility.





9.0 OFFSITE LAND DISPOSAL FACILITIES

Based on the results of waste profile and classification, the generated waste will be transported to a proper offsite disposal facility. Final determination of the facility selected for disposal will be based on approval from the disposal facility. Once the disposal facility is determined, copies of waste profile reports used to secure disposal permission from the facility will be kept at the generating facility [Boeing] and available upon request..

9.1 NON-HAZARDOUS MATERIAL

Most of the removed soil from the excavations will meet non-hazardous waste classification criteria. Non-hazardous material will be transported to Chemical Waste Management's Antelope Valley Recycle and Disposal Facility. Soil profiles will be prepared based on the results of the laboratory analyses of samples from each waste stream. The landfill facility will dispose of the non-hazardous materials in accordance with each specific profile.

Facility Address

Antelope Valley Recycle and Disposal Facility 1200 W. City Ranch Road Palmdale, CA 93553

Facility Contact

Elizabeth Navarro Tel: (559) 834-9151

Alternate Non-hazardous waste facilities may be used if service at Antelope Valley is not available. Non-hazardous material will be profiled and approved at an alternate non-hazardous waste facility prior to disposal. These facilities may be in or out of the State of California.

9.2 HAZARDOUS MATERIAL

. Material classified as hazardous waste will be secured in 55-gallon drums, 20-yard bins, or other DOT-approved containers, and transported to a RCRA Part B Transportation, Storage, Disposal Facility [TSDF] that has the appropriate permit(s) for, and will accept, the waste the generator is shipping per 40 CFR 264.12. Within the State of California, disposal facilities include the Chemical Waste Management Kettlemen Hills Facility or the Clean Harbors Buttonwillow Landfill. Alternate Out-of-State TSDFs may be used providing they comply with the 40 CFR 264.12 requirement if disposal at a State of California TSDF is not available. Soil profiles will be prepared based on the results of the laboratory analyses of samples from each



waste stream. The landfill facility will dispose of the hazardous materials in accordance with each specific profile.

State of California TSDFs

Facility Address

Chemical Waste Management, Inc. 35351 Old Skyline Road Kettleman Hills Facility Kettleman City, California 93239

Facility Address

Clean Harbors Buttonwillow Landfill 2500 West Lokern Road Buttonwillow, CA 93206

Facility Contact

Rachel Lopez
Tel: (559) 386-9711
Esther Salazar
Tel: (559) 386-9711

Facility Contact

Marie Bouni Tel: (661) 762-6200



10.0 RECORDKEEPING

A daily field logbook will be maintained by the transportation manager during transportation activities. The field logbook will serve to document observations, personnel onsite, important transportation information, and other vital project information.

The daily field logbook will document the following waste transportation details for each load that departs the SSFL:

- Date and time of loading;
- Vehicle identification:
- Truck driver name and trucking company name;
- Approximate weight of the load;
- Decontamination verification;
- Comments or remarks;
- Handling or the hazardous waste manifest;
- Type and quantity of waste in container/load;
- Destination and departure time;
- Instruction to truck drivers on record-keeping;
- Handling of hazardous waste manifest (signature, distribution of copies and handling);
- Handling of Transportation Plan; and
- Handling of driving certificate, maintenance log and vehicle permits.

Each truck driver will be given a copy of this Transportation Plan, which includes complete instructions describing the route to each disposal facility. The Transportation Plan, trucking company's Health and Safety Plan (HSP), manifests or bills of lading, and analytical results (profile) shall be kept by the truck driver in the cab of the truck with the driver. The driver will be responsible for handing over the manifest or the bill of lading to the disposal facility, at the disposal facility gate, for signature and processing by the disposal facility.





11.0 HEALTH AND SAFETY

A site-specific HSP has been prepared for the ISRA removal activities. Personnel working at the SSFL will be required to be familiar with the HSP. The HSP will be used for training purposes prior to the start of the project. Prior to transportation activities, the transportation manager will hold a health and safety meeting with all vehicle operators to thoroughly communicate the Transportation Plan and the HSP to the vehicle operators. Each vehicle operator will acknowledge their understanding of the plans by signing the attendance sheet. New truck drivers assigned to haul hazardous waste will go through the same procedures prior to being authorized to commence the work.

Truck drivers hauling hazardous waste will have Health and Safety training in accordance with 29 Code of Federal Regulations (CFR) 191 0.120 and CFR Title 8 Section 5192. The drivers will be protected per level D. Onsite personnel will not be allowed near the loading area to avoid unnecessary exposure to airborne dust and/or physical risks associated with movement of heavy equipment (loaders, etc.).





12.0 CONTINGENCY PLAN

Each waste hauler is required to have a contingency plan prepared for emergency situations (vehicle breakdown, accident, waste spill, waste leak, fire, explosion, etc.) during transportation of waste from the SSFL to the designated disposal facilities. Once the waste hauler is selected, a copy of their contingency plan will be attached to this Transportation Plan.

Prior to transportation activities, the transportation manager will hold a kick-off meeting with all truck drivers to thoroughly communicate the Contingency Plan to the drivers. Each driver will carry a copy of the Contingency Plan in the cab of the truck and will be prepared to implement the tasks assigned to them. The transportation manager will communicate the Transportation Plan to emergency service organizations, law enforcement agencies, and transportation authorities that have jurisdiction along the proposed route.

In case of hazardous waste release during transportation, the following shall be contacted by the driver:

911	if release originates on the highway
(800) 852-7550	if release originates off highway (State Office of Emergency Services)
911	Local Fire Department
(415) 974-8132	EPA Regional Emergency Response Office, Region 9
(916) 255-6504	DTSC – Emergency Response





13.0 REFERENCES

MWH. 2009a. Preliminary ISRA Work Plan, Santa Susana Field Laboratory, Ventura County. February.

MWH. 2009b. Final ISRA Work Plan, Santa Susana Field Laboratory, Ventura County. May.

MWH. 2009c. Draft ISRA Soil Management plan, Santa Susana Field Laboratory, Ventura County. June



