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

Certified Mail

May 28, 2010 In reply refer to SHEA-110002

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

Attention: Mr. Peter Raftery

Dear Mr. Raftery:

Subject: 2010 Addendum to the Interim Source Removal Action (ISRA) Soil Management Plan and Transportation Plan Submittal in Response to California Water Code Section 13304 Order (NPDES No. CA0001309, CI No. 6027,

SCP No. 1111, Site ID No. 2040109)

The Boeing Company (Boeing), on behalf of Boeing and the National Aeronautics and Space Administration (NASA), wishes to provide the attached 2010 Addendum to the ISRA Soil Management Plan, as referenced in the May 1, 2009 Final ISRA Work Plan, for your review.

If you have any questions or require anything further, please contact Lori Blair at 818-466-8741.

Very truly yours,

Thomas D. Gallacher Director, Santa Susana Field Laboratory Environment, Health, and Safety

LNB:bjc Attachment:

(1) 2010 Addendum to the ISRA Soil Management Plan (2) 2010 Addendum to the ISRA Transportation Plan

cc: Ms. Cassandra Owens, RWQCB Mr. Buck King, DTSC Mr. Gerard Abrams, DTSC Mr. Allen Elliott, NASA Mr. Steve Slaten, NASA

2010 ADDENDUM TO THE INTERIM SOURCE REMOVAL ACTION (ISRA) TRANSPORTATION PLAN SANTA SUSANA FIELD LABORATORY VENTURA COUNTY, CALIFORNIA

Prepared For:

THE BOEING COMPANY

and

THE NATIONAL AERONAUTICS AND SPACE ADMINISTRATION

Prepared By:

MWH 618 Michillinda Avenue, Suite 200 Arcadia, California 91007

May 2010

Alex Fischl, P.M.P. Project Manager



caret S. Milman Barris

Margaret S. Milman-Barris, P.G. 8682 Project Geologist

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ABBREVIATIONS AND ACRONYMS

Boeing	The Boeing Company
CAO	Cleanup and Abatement Order
CCR	California Code of Regulations
CFR	Code of Federal Regulations
су	cubic yards
DOT	Department of Transportation
DPH	California Department of Public Health
DTSC	Department of Toxic Substances Control
HSP	health and safety plan
ISRA	Interim Source Removal Action
LLRW	low-level radioactive waste
MWH	MWH Americas, Inc.
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
SSFL	Santa Susana Field Laboratory
USEPA	U.S. Environmental Protection Agency
WDR	waste discharge requirements





1.0 INTRODUCTION

This 2010 Addendum to the Interim Source Removal Action (ISRA) Transportation Plan was prepared to support implementation of 2010 ISRA activities at the Santa Susana Field Laboratory (SSFL), Ventura County, California. Details of the 2010 ISRA implementation effort that this plan supports were described in the Final ISRA Work Plan prepared by MWH Americas, Inc. (MWH) (MWH, 2009b) and the 2010 ISRA Work Plan Addendum (MWH, 2010b). This 2010 Addendum to the ISRA Transportation Plan was prepared by MWH on behalf of The Boeing Company (Boeing) and the National Aeronautics and Space Administration (NASA).

This plan outlines proposed off-site transportation and disposal activities for all waste soils to be excavated during the 2010 ISRA implementation. Soils within planned excavation areas have been identified as impacted by former SSFL site operations during previous site investigation activities. A comprehensive site history for each of the ISRA areas was provided in the Preliminary ISRA Work Plan (MWH, 2009a). This 2010 Addendum to the ISRA Transportation Plan describes the approach for transporting soils consistent with all laws and regulations regarding the transportation of impacted soils.

1.1 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.

On December 3, 2008, the Los Angeles Regional Water Quality Control Board (RWQCB) issued a California Water Code Section 13304 Cleanup and Abatement Order (CAO) requiring an ISRA for Outfalls 008 and 009 (RWQCB, 2008). The CAO was issued by the RWQCB to achieve compliance with the Waste Discharge Requirements (WDR) for Outfalls 008 and 009 established in its National Pollutant Discharge Elimination System (NPDES) Permit, NPDES No. CA0001309 (NPDES Permit). A Preliminary ISRA Work Plan was submitted to the RWQCB on February 15, 2009, that presented the approach used (MWH, 2009a), and a Final ISRA Work



Plan was submitted to the RWQCB on May 1, 2009, that described the ISRA area identification and remedial planning process, and completed this process for ISRA areas planned for remediation in 2009 (MWH, 2009b). A 2010 ISRA Work Plan Addendum was submitted to the RWQCB on April 30, 2010, that completed the remedial planning process for the remaining ISRA areas (MWH, 2010b). Remedial actions for the 2010 ISRA areas consist of excavation, offsite transportation, and disposal of impacted soil; re-contouring and re-vegetation of disturbed areas; and soil confirmation sampling.

Investigations of chemical contamination in soil, groundwater, and related media (e.g., soil vapor, weathered bedrock) at the SSFL are 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 evaluation areas (PEAs) that were identified in the Preliminary ISRA Work Plan (MWH, 2009a) has been conducted and reported in the 2010 ISRA Work Plan Addendum (MWH, 2010b), and is currently ongoing to further define impacted soil areas for ISRA implementation in 2010 and 2011.

ISRA remedial actions at Happy Valley within the Outfall 008 watershed and at two areas within the Outfall 009 watershed (A2LF-1 and A2LF-3) were completed in 2009 and reported in the Phase I Implementation Report (MWH, 2010a). ISRA remedial actions at areas near the B-1, IEL, LETF/CTL-I, and AP/STP-I areas within the Outfall 009 watershed are scheduled for activity in 2010, and remedial actions at other areas within the Outfall 009 watershed are scheduled for activity in 2011.

1.2 ISRA EXCAVATION DESCRIPTION

There are a total of fifteen excavation areas planned for 2010: nine excavation areas in the eastern Outfall 009 watershed (B1-1A, B1-1B, B1-1C, B1-1D, B1-2, CTLI-1A, CTLI-1B, IEL-1, and IEL-2) and six excavation areas in the western Outfall 009 watershed (AP/STP-1A,



AP/STP-1B, AP/STP-1C, AP/STP-1D, AP/STP-1E, and AP/STP-1F). Impacted soil from the excavation areas will be removed by a backhoe, front-end loader, vacuum truck, and hand tools. Soil handling, stockpile management, and waste classification and characterization procedures for the 2010 ISRA activities are described in the 2010 Addendum to the ISRA Soil Management Plan (MWH, 2010c). 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 2010 Addendum to the ISRA 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 2010 activities for which this 2010 Addendum to the ISRA Transportation Plan has been prepared. This Transportation Plan and Contingency Plan Section will be updated as warranted for future ISRA activities 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 2010 is approximately 17,780 cubic yards (cy). This volume was estimated based on an evaluation of data from RFI and ISRA sampling efforts, and is slightly lower than estimated excavation volumes reported in the 2010 ISRA Work Plan Addendum (MWH, 2010b), because additional data gap/delineation sampling conducted since the completion of that Work Plan caused the excavation boundaries to be refined.

2.1 ESTIMATED WASTE QUANTITY

The total volume of *ex situ* excavated soil is approximated at 17,780 cy, or approximately 890 truck loads, assuming an average truck load of 20 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 2010 ISRA Work Plan Addendum (MWH, 2010b).

2.2 WASTE PROFILING

As described in the 2010 Addendum to the Soil Management Plan (MWH, 2010c), waste profiling will be largely determined by reviewing analytical results from *in situ* soil samples collected for waste characterization purposes within each planned excavation area. 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 characterized and classified in accordance with regulations described in California Code of Regulations (CCR), Title 22, Sections 66261.20 and 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.

All waste characterization samples will also be analyzed for a designated suite of radionuclides as described in Attachment A of the 2010 Addendum to the Soil Management Plan (MWH, 2010c). In its November 9, 2007 letter conditionally approving a work plan submitted for the



Northern Drainage cleanup project, the DTSC stated that "screening of excavated soils and debris shall be conducted to verify the excavated materials have no radiologic restrictions and do not violate any local, state or federal requirements regarding their management, handling, or disposal" (DTSC, 2007). The procedures developed and approved by DTSC for the Northern Drainage cleanup project have been included for the ISRA project.

Sampling frequency will be determined based on waste characterization requirements as described in the 2010 Addendum to the ISRA Soil Management Plan (MWH, 2010c). The radionuclide analytical suite and laboratory requirements are presented in the 2010 Addendum to the ISRA Soil Management Plan (MWH, 2010c).

ISRA waste characterization samples will be compared to radionuclide background data from McLaren/Hart (1995), as referenced in Attachment A of the 2010 Addendum to the Soil Management Plan (MWH, 2010c). Detection of radionuclides above McLaren/Hart established background levels does not necessarily indicate a local source of contamination, as this study did not necessarily take into consideration the range of natural accumulation processes of worldwide fallout. A radiological background study for the SSFL is currently being conducted by the U.S. Environmental Protection Agency (USEPA), and once those values are finalized, they will be used for the ISRA project.

If ISRA waste characterization samples are determined to contain radionuclides above background, the RWQCB, Department of Public Health (DPH) and the DTSC will be notified. If the waste is not low-level radioactive waste (LLRW), then the waste may be sent to a Class 1 or Class 2 landfill. This determination may be accomplished (1) by dose assessment, or (2) by classifying the waste as "decommissioned materials" as defined in Executive Order D-62-02, or (3) by classifying the waste as "license-exempt." If the waste should be classified as LLRW, the waste will be disposed of at a LLRW disposal facility, and export approval would be sought from the Southwestern LLRW Commission.



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 ISRA areas within the eastern Outfall 009 watershed 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 ISRA areas within the western Outfall 009 watershed will be stockpiled at the parking lot adjacent to the helipad. Stockpile staging areas are shown in Figure 2. 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 2010 Addendum to the ISRA Soil Management Plan (MWH, 2010c).





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

Trucks will be dispatched 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 a designated loading area following 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 staging area near the helipad. Excess trucks will use available parking space at SSFL.

On-site truck routes, the SSFL front gate, the stockpile staging locations, and the inspection area are shown on Figure 3.





6.0 TRUCK LOADING OPERATIONS

Transportation trucks will be loaded at stockpile staging areas, which are anticipated to be at the Lower Parking Lot (eastern Outfall 009) and the parking lot adjacent to the helipad (western Outfall 009) (Figure 2).

Careful 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 nonhazardous 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 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 below.

8.1 ONSITE TRUCK ROUTE

Two excavation areas (CTLI-1A and CTLI-1B) are located on and near the top of a ridge between the Area I Service Road and the Area II Service Road; access to these ISRA areas is from the north via a historic, currently unimproved road that intersects the Area II Service Road. This CTLI-1 access road will be improved and graveled prior to the start of excavation to allow safe truck access, and will include a truck turn-around area at the top. All other 2010 ISRA excavation areas are located adjacent to paved roads.

Onsite truck routes from the excavation sites to stockpile areas, from stockpile areas to the inspection area (where truck inspection, weighing and manifesting will occur), and from the inspection area to the SSFL Gate are shown on Figure 3 and described below.

Eastern Outfall 009 Watershed Area. Onsite haul trucks transporting soil from eastern Outfall 009 watershed excavation sites to the Lower Parking Lot stockpile staging area will proceed as follows:

- from the B-1 area, trucks will proceed southwest through the Main Gate, and turn right into the Lower Parking Lot;
- from the IEL area, trucks will proceed northeast on Area I Road, and turn left into the Lower Parking Lot; and
- from the CTLI-1 area, trucks will proceed north on the gravel access road, turn right onto the Area II Service 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 inspection area. At the inspection area, trucks will be inspected, weighed, and receive a manifest for the load, at which point they will travel east on the Area II Service Road and exit through the SSFL gate.



Western Outfall 009 Watershed Area. Onsite haul trucks transporting soil from western Outfall 009 watershed excavation sites to the helipad parking lot stockpile staging area will proceed as follows:

• from AP/STP-1A, AP/STP-1B, AP/STP-1C, AP/STP-1D, AP/STP-1E and AP/STP-1F, trucks will exit from the excavation area towards the west, turn right onto Alfa Road, turn right onto Area II Service Road, turn left onto Helipad Road, and travel west-southwest across the helipad to the helipad parking lot.

Offsite disposal trucks loading in the helipad parking lot will travel east-northeast across the helipad, turn onto Helipad Road, turn left on Area II Service Road, and travel east on Area II Service Road towards the inspection area (Figure 3). At the inspection area, trucks will be inspected, weighed, and receive a manifest for the load, at which point they will travel east on the Area II Service Road and exit 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 State Route 118 (the Ronald Reagan Freeway).

Primary Route to State Route 118

The route to State Route 118 is shown on Figure 4. 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. The entrance to State Route 118 is on Topanga Canyon Boulevard.

Route to Antelope Valley Recycle and Disposal Facilities

The route to the Antelope Valley Recycle and Disposal Facility is shown on Figure 5. Vehicles will travel east on State Route 118, merge onto northbound I-405 (the San Diego Freeway), merge onto northbound I-5, and then proceed east on State Route 14. Vehicles will exit State Route 14 at W. Avenue S and proceed west, turn right (north) onto Tierra Subida Ave, and proceed approximately 0.6 miles to the facility entrance.



Route to U.S. Ecology, Beatty

The route to U.S. Ecology, Beatty is shown on Figure 6. Vehicles will go east on State Route 118, merge onto the eastbound I-210, and then merge onto the eastbound I-15. Vehicles will exit at Baker onto the northbound California State Route 127, and proceed north to Nevada State Route 373, then turn left onto northbound US Route 95 and proceed to the facility.

Route to Clean Harbors – Buttonwillow, California Facility

The route to Clean Harbors Buttonwillow Facility is shown on Figure 7. Vehicles will travel east on State Route 118, merge onto northbound I-405 (the San Diego Freeway), and then merge onto northbound I-5 and proceed for approximately 99 miles. Vehicles will take exit 257 toward McKittrick/Buttonwillow/State Highway 58, turn right onto Tracey Avenue, and then turn right onto State Highway 58. Vehicles will proceed west on State Highway 58 for approximately 8 miles, then turn right onto Lokern Road and proceed to the facility.

Route to U.S. Ecology, Idaho Facility

The route to U.S. Ecology, Beatty is shown on Figure 8. Vehicles will go east on California State Route 118, merge onto the eastbound I-210, and then merge onto the eastbound I-15 and proceed through Las Vegas. North of Las Vegas, vehicles will exit onto the northbound US Route 93, and proceed north. At the junction with State Route 375 and 318, vehicles will proceed straight onto Nevada State Route 318, then turn right onto eastbound US Route 6. At Ely, Nevada, vehicles will turn left onto Great Basin Boulevard (which is US Route 50 and US Route 93), then turn right onto Aultman Street to follow US Route 93 north. Vehicles will continue north on US Route 93 through Wells, Nevada, and enter the west-bound I-84 at Twin Falls, Idaho. Vehicles will exit I-84 at Hammett Hill Road (Idaho State Route 78), turn left onto Hammett Hill Road and proceed south for approximately 1 mile, jog left at Old Oregon Trail Highway (Old US Route 30), turn right onto Main Street and proceed for 1000 feet, then turn right to follow Idaho State Route 78 west. Vehicles will proceed 10 miles west past Grand View, turn right onto Lemley Road, and proceed to the facility.



8.3 ALTERNATE OFFSITE TRUCK ROUTE

US-101 (the Ventura Freeway) and Interstate 405 can be used to reach the necessary routes to disposal facilities instead of State Route 118. This alternate route is not recommended because traffic on US-101 is usually heavier than on State Route 118. Another alternate route is to access State Route 118 from De Soto Avenue instead of Topanga Canyon Boulevard.



9.0 OFFSITE LAND DISPOSAL FACILITIES

Based on the results of waste profile and classification, the generated waste will be transported to an appropriate 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 provided to DTSC.

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

9.2 HAZARDOUS MATERIAL

Material classified as hazardous waste will be secured in DOT-approved containers, and transported to the U.S. Ecology Beatty, Nevada facility or the Clean Harbors Buttonwillow Landfill for disposal. Materials classified as license-exempt material will be secured in DOT-approved containers, and transported to the U.S. Ecology, Idaho 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 hazardous materials in accordance with each specific profile.

Facility Address

US Ecology, Beatty P.O. Box 578 HWY 95, 11 miles South of Beatty Beatty, NV 89003 Facility Contact James Hubbard Tel: (800) 959-8601



Facility Address

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

Facility Address

U.S. Ecology, Idaho 20400 Lemley Road Grand View, ID 83624

Facility Contact

Marie Bouni Tel: (661) 762-6200

Facility Contact

Tino Cereceres Tel: (800) 274-1516



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 is currently being prepared for the 2010 ISRA removal activities and will be submitted to the RWQCB. Personnel working at the SSFL will be required to be familiar with the 2010 HSP. The 2010 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	USEPA Regional Emergency Response Office, Region 9
(916) 255-6504	DTSC – Emergency Response





13.0 REFERENCES

- DTSC, 2007. Conditional Approval for Imminent and Substantial Endangerment Determination and Order and Remedial Action Order-Required Work Plan-Related Submittals, Former Liquid Oxygen Plant Debris Field, Sage Ranch and Santa Susana Field Laboratory, Ventura County (CAD 093365435 and CA 1800090010), Letter to Boeing. November 9.
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FIGURES



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