

September 20, 2007

Attn: Dr. Xavier Swamikanner  
L. A. Regional Water Quality Control Board  
320 W. 4<sup>th</sup> Street, Suite 200  
Los Angeles, California  
90013-2343  
Fax no. 213/576-6640

*faxed received  
9/20/07  
Registers mail sent  
9/21/07 in all  
(8 Page in all)*

RE; **MS 4 Permit "Second Draft" for Ventura Water Shed Protection District  
County of Ventura, and the Incorporated Cities. NPDES no. CA. S004002  
Order no. 07-XXX**

Dear Mr. Swamikanner,

I am in opposition to this proposal, (MA 4 Permit Second Draf). Having said that, I feel that three important points stand out;

- "Major out fall" where effluent is dumped. The proposal deals with transporting effluent to another exit area, other than the City of Simi Valley. What I'm hearing is the monitoring of "Major out fall's" (piped exit area) will now be tested, instead of each individual contaminating polluter point of effluent discharge. The toxic effluent won't be monitored at "point source", but rather it will be done at the point of "piped effluent major out fall discharge". Is this correct?

I'm sure the thinking process sounded good, however the reality is that at some point the effluent has to be "cleaned up-not just watered down". What about the discharge area in community down stream. How will this "Major Out Fall" effect their drinking water?

- The Santa Susana Field laboratory, (SSFL) impacts the City of Simi Valley's NPDES Permit.

The building that has taken place since the first melt down in November of 1959 has had an impact on the City of Simi Valley, not to mention the additional contamination from the 1963 and 1969 melt downs that likewise were not reported or taken into consideration when EIR's were done for building. The Air and Water quality impact from contamination has never been brought into the picture since 1992 when I came on board attending the SSFL meeting.

How will the impact of the Cities NPDES Permits be addressed?

- Water Rights of Simi Valley residents, not only how the "Noncompliance" has effected them (residents)health wise, but what about a legal obligation.

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MS 4, Second Draft  
September 20, 2007  
Mr. Swamikanner / Doose

As a resident with Water Rights attached to my property, who's Rights were violated on;

1. Notification of proposed projects within said water way,
2. The diversion of Water from the Las Lajas Channel down Streans Street pumped up to the SSFL site.

Where does that leave us (residents)? Are we now liable for the cover-up of toxic contamination at the SSFL site, since it was our water that was pumped up to that site? And, if I understand the MS 4 Permit, Second Draft correctly you are proposing to dump the effluent down stream, before monitoring. Would residents in Simi Valley be liable for that as well, since liability can go back to the sources?

As I said the thinking sounds good, but the reality is lost. Using the Band-Aid approach isn't sound Water Management from where I sit. I'm very concerned that your proposal is self serving. If the effluent is sent to a down stream Community the fact that toxic contaminates remain in the soil at the SSFL site for decades will be over looked. And, I fear that somewhere down the road families that are allowed to build and reside in the toxic contamination will experience deadly cancer illnesses , and this "night-mare" will just repeat itself once more. And, that to me is not being a responsible overseeing agency.

~~I'm in opposition to this Second Draft MS 4 Permit for Ventura County wide.~~

Sincerely,



Ginn Doose  
c/o P.O.Box 2310  
Clearlake., Ca.  
95422

August 31, 2007  
NPEDS  
Attn; Mrs. Cassandra Ownes  
Permit Industrial Unit/sect.  
Cal. EPA-LARWQCB  
Region 4, Suite 200  
320 West 4<sup>th</sup> Street  
Los Angeles, California  
90013

Fax. No. 213/ 576-6640  
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Copy of hand written  
Opposition, (1) faxed 9/4/07  
proof, and (2) 8/10/07 filing  
To Ms. Rainey, D.T.S.C.P.C.A.U.

RE: The Boeing Company Santa Susana Field Laboratory National Pollution  
Discharge Elimination System Permit Amendment (Proposed Order No.  
R4-2007-OXXX), and Water Discharge Requirements.

Dear Mrs Ownes,

When I first started to review the documents listed below;

- The Proposed Order R4-2007-OXXX,
- The Fact Sheet,
- The Administration Civil Liberty Complaint, and

- 
- The Consent Order for Corrective Action.

I felt we were off to a good start, making progress of;

**Identifying, Addressing, and Containing**

the toxic contamination that has spewed carcinogens into the Air and Water Supply for the  
Ventura and Los Angeles areas for 57 years now.

I appreciate the efforts that went into assisting the formulation of this order. But in all  
honesty, I was hoping to see stronger wording/language. I am of the opinion that some of the  
statements are misleading and somewhat contradictory. I refer to;

- "Transported using piping to a Natural Drainage Channel", P. 9 Fact Sheet.
- "Provide a significant portion of the Headwater", P.28 Order/No. R4-2007-OXXX.

- “Discharge is located in Arroyo Simi and the sediment contraction at the Arroyo Simi East of Hitch Blvd., or at Simi Valley Water Quality Control Plant should not exceed the interim effluent limitation. Since these facilities are located near the top of the Water Shed, The Discharger may choose to collect sediment samples closer to the facility”  
P. 55, of Order No. R4-2007-OXXX.

This statement bothers me, it would appear that the effluent will be piped passed Simi Valley, and dumped the effluent in a down stream Community, still flowing towards the Pacific Ocean.

In other words Boeing isn't changing the amount of effluent discharged, it's just being dumped in some one else's "back yard" using the **Band Aid** approach. I question if you are not testing missals any longer (MWH-2006 Report SSFL Area 6) as of 1992, what is all the effluent from? Remember the Simi Arroyo flows into the Cajaguas Creek than to the down stream Communities.

- “Boeing operation at the SSFL since 1950” Doc. The Consent Order for Correction Action, P. 2, 2<sup>nd</sup> Pf., 2-3 sentence.

- “DTSC issued Post Closure Permits for Area's I, and III on May 11, 1995. The Post Closure Permit for Area's I, and III was issued to [The Boeing Co. Rocketdyne Pollution And Power]", as owner and operator". The wording tells me that Boeing and Rocketdyne are held by the same Parent Corp. that just appear to be two different no-related Corporations, when actually they are one in the same.

- “The Discharge is Storm Water and it is near the top of the Water Shed, the Discharger may utilize the option of Sampling the OC Pesticides and PCB's or Sampling the receiving Water. The Discharger may also choose to join the Cajaguas Creek Water Shed, TSDL Monitoring Program and Monitor at an Established Compliance Sampling location in the Simi Arroyo”, P. 28 Fact Sheet.

I'm concerned, I could go on but there are too many items that don't make sense. I've tried to list a few discrepancies that are being over looked. With the on going violations to the Publics Drinking Water for 57 years now, I'm disappointed that the language / wording wasn't “Stronger”.

**I'm in favor of asking for an investigation by the State Attorney General.** Let's take this back to the (State Water) Board and work on making this “Fool-Proof”. It's criminal what has taken place here in Los Angeles and Simi Valley. And, Im told that in Washington State near where Boeing has its headquarters there has been reported violations from that plant.

Sincerely,



Ginn Doose, P.O.Box 2310, Clearlake, Ca. 95422