

## Los Angeles Regional Water Quality Control Board

March 22, 2018

Mr. Daniel S. Samorano  
Raytheon Company  
1151 East Hermans Road  
TU, Bldg. 845  
Tucson, AZ 85706

Certified Mail  
Return Receipt Requested  
Claim No. 7016 0750 0000 3359 3034

**SUBJECT: NO FURTHER ACTION FOR GROUNDWATER**

**CASE/SITE: SOUTHERN PARCELS OF FORMER HUGHES MISSILE SYSTEMS  
COMPANY FACILITY, 8433 FALLBROOK AVENUE, CANOGA PARK,  
CALIFORNIA (SCP NO. 0693A, SITE ID NO. 2043T00)**

Dear Mr. Samorano:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the state agency with primary responsibility for the protection of groundwater and surface water quality within major portions of Los Angeles and Ventura counties, including the referenced site. To accomplish this, the Regional Board oversees the investigation and cleanup of discharges of waste that may affect the quality of waters of the state as authorized by the Porter-Cologne Water Quality Control Act (California Water Code [CWC], Division 7).

This site has been jointly lead by the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) and the Department of Toxic Substances Control (DTSC). The Regional Board has been overseeing the investigation and remediation of groundwater contamination at the site, while the DTSC has jurisdiction to address the site soil contamination as a result of the historical operations under various Resource Conservation and Recovery Act (RCRA) permits.

Regional Board staff have reviewed the July 31, 2012, *Confirmation Sampling Report for No Further Action Status in the Southern Parcels* prepared and submitted by your environmental consultant, Oneida Total Integrated Enterprise, and other relevant information regarding the southern parcels of former Hughes Missile System Facility (site). The following information is presented in the submitted reports:

1. The subject site consists of three parcels, with current Los Angeles County Assessor Identification (Parcel) Numbers 2005-002-014, 2005-002 -901, and 2005-002 -013 (Attachment 1). The site is part of an approximately 56-acre property that was occupied and operated as an industrial park from 1959 through 1994. In 1959, the 56-acre property was developed as an industrial park by Bunker-Ramo, an electrical component design and testing company. From 1966 through 1994, the former Hughes Missile Systems operated the 56-acre property as an aerospace research and development facility. Since 1995, the site has been redeveloped with several commercial office buildings.

Since the early 1990s, numerous investigations and remedial activities have been conducted at the 56-acre property. Through a merger with Hughes in 1997, Raytheon assumed management of the environmental investigations and remediation activities at the 56-acre property.

2. During the 56-acre property-wide environmental investigation activities in the early 1990s, concentrations of Trichlorofluoromethane (also known as Freon-11) were detected up to 300 micrograms per liter ( $\mu\text{g/L}$ ), above its California drinking water maximum contaminant level (MCL) of 150  $\mu\text{g/L}$ , in groundwater well CM-10. Monitoring well CM-10 is located within Parcel No. 2005-002-013 of the site.
3. From 1993 to 1998, additional site characterization activities were conducted at and within the vicinity of well CM-10 to identify the source area and further define the extent of the Freon-11 plume. Based on the results of the soil, soil vapor, and groundwater investigations, the former parking lot, located between former Buildings 274 and 276, was identified as a source area. Historical operations in Buildings 274 and 276 included solvent cleaning using Freon-11.
4. In 2007, the Regional Board approved the removal of nine wells (CM-10, CM-11A, CM-12, CM-15, CM-17, MW-28, MW-29, MW-30, and MW-31) located at and in and vicinity of the site (Parcels 2005-002-014, 2005-002-013, and 2005-002-901) from the 56-acre property-wide groundwater monitoring program. Based on the cumulative groundwater monitoring data collected from these wells, the concentrations of VOCs had been consistently below MCLs or non-detect for several years and concentrations of Freon-11 in groundwater had decreased over the last several years and continued to be below its MCL of 150  $\mu\text{g/L}$ .
5. In 2012, as part of the confirmation sampling activities, additional groundwater sampling was conducted both on-site and off-site. The results of this confirmation sampling indicate that the extent of Freon-11 impacted groundwater has been adequately defined. All detected concentrations of Freon-11 in groundwater during this confirmation sampling were below its MCL of 150  $\mu\text{g/L}$ .
6. The results of the source investigation and groundwater monitoring and sampling are summarized as follows:
  - A. The occurrence of Freon-11 in well CM-10 has been adequately investigated and the source was identified. Since the associated former on-site building was demolished and operations stopped, there is no active or continued source at the site.
  - B. The lateral and vertical extents of the Freon-11 groundwater impact have been fully assessed and defined both in the vicinity of the identified Freon Source Area and off-site downgradient direction.
  - C. The groundwater monitoring data collected from 1993 to 2012 show decreasing trends of Freon-11 concentrations to levels continuously below its MCL of 150  $\mu\text{g/L}$ .
  - D. Groundwater investigation and continued monitoring data do not indicate any significant residual Freon-11 contamination that warrants further monitoring or remediation.

A Notice of Opportunity to Comment on the no further action determination was sent out on November 13, 2017, inviting comments. The due date to submit comments to this Regional Board was December



15, 2017. By the specified due date, the Regional Board received only one response letter, which was from the DTSC and is summarized below:

On December 15, 2017, the Regional Board received a comment letter from the DTSC, which was addressed to Raytheon (Attachment 2). In the letter, the DTSC recommended that the existing groundwater monitoring wells in the area be resampled for VOCs prior to the Regional Board granting an NFA and allowing well abandonment.

In response to the DTSC's recommendation, Raytheon's consultant monitored two related wells MW-31 and CM-10, which are located in and downgradient of the former area of concern. The results of this confirmation monitoring are presented in the February 8, 2018 technical memorandum titled *Additional Groundwater Sampling for Southern Parcel Closure* (Memo). The Memo indicates that wells MW-31 and CM-10 were monitored on January 22, 2018. Due to dryness of well CM-10, only one confirmation groundwater sample was collected from MW-31 and analyzed for VOCs. Freon-11 was detected at concentration of 64 µg/L, which was below its MCL of 150 µg/L. No other VOCs were detected in the sample collected from well MW-31.

#### **No Further Action Determination**

Based upon information provided to the Regional Board, and with the provision that the information was accurate and representative of site conditions, the Regional Board requires no further action (NFA) for groundwater beneath the site (APNs: 2005-002-013, 2005-002-901, and majority of 2005-002-014) at this time. However, the site owners/operators must notify the Regional Board immediately, following up with notification letter within 72 hours, if additional waste in soil and/or groundwater is encountered at the site.

#### **Well Abandonment and Destruction**

All monitoring wells (CM-10, CM-11A, CM-12, CM-15, CM-17, MW-21S, MW-21D, MW-22S, MW-22D, MW-28, MW-29, MW-30, and MW-31) shall be abandoned in accordance with the California Department of Water Resources, Bulletin 74-81 and Bulletin 74-90, *California Well Standards*. For well abandonment, you must comply with the following:

- A. Well abandonment permits must be obtained from the Los Angeles County, Public Health Department, Environmental Health Division, Drinking Water Program. Any other necessary permits must be obtained from the appropriate agencies prior to the start of field work.
- B. A well abandonment report shall be submitted to this Regional Board by **July 31, 2018**. This report must include, at a minimum, as site map showing the well location, a description of the well abandonment process and waste handling, and copies of all signed permits.

The jurisdiction requirements of other agencies, such as the United States Environmental Protection Agency, are not affected by the Regional Board's issuance of a NFA letter at the site. Such agencies may choose to make their own determination concerning this site.

Mr. Daniel S. Samorano  
Raytheon Company  
SCP No. 0693A

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March 22, 2018

We would like to take this opportunity to thank you for your full cooperation with the Regional Board during the course of the site assessment. Should you have any questions regarding this matter, please contact Ms. Emily Wong, Project Manager, at (213) 576-6736, [emily.wong@waterboards.ca.gov](mailto:emily.wong@waterboards.ca.gov), or Ms. Su Han, Unit Chief, at (213) 576-6735, [su.han@waterboards.ca.gov](mailto:su.han@waterboards.ca.gov).

Sincerely,

  
Samuel Unger, P.E.  
Executive Officer

Attachment: Attachment 1 - Site Parcel Map  
Attachment 2 - DTSC's letter dated December 15, 2017

cc: see next page

cc: **State and Local Agencies (via Electronic Copy)**

Mr. Sutida Bergquist, California Division of Drinking Water – Central  
Mr. Luis Sepulveda, Watermaster, California Department of Water Resources  
Mr. Richard Lavin, Los Angeles County, Department of Public Health  
Mr. Richard Slade, Upper Los Angeles River Area Watermaster  
Ms. Jessy Fierro, Department of Toxic Substances Control  
Mr. Brian Partington, Water Replenishment District Southern California  
Ms. Sarah Combe, City of Los Angeles, Department of Water and Power

**Project Interested Parties (via Electronic Copy)**

Mr. Daniel S. Samorano, Raytheon Company  
Mr. Jacques Marcillac/Ms. Kim Sawyer, OTIE  
Mr. William Preston Bowling, Aerospace Cancer Museum and Education  
Ms. Christina Walsh, Cleanuprocketdyne.org  
Ms. Bonnie Klea  
Ms. Chris Rowe  
Mr. Daniel Wiseman

**Property Owners (via Electronic Copy)**

Parcel Number 2005-002-014  
BSREP West Hills Office Campus LLC  
c/o Ms. Erin Sullivan, CBRE USA

Parcel Number 2005-002-013  
BA Leasing BSC LLC  
c/o Mr. John Gallant, Thermo Fisher Scientific

Parcel Number 2005-002-901  
Ms. Melody McCormick, City of Los Angeles

**Occupants Parcel Number 2005-002-014 (via Postal Service)**

Quest Diagnostics  
8401 and 8403 Fallbrook Ave.  
Canoga Park, CA 91304

Sears Operations Center  
8407 Fallbrook Ave., Ste, 100  
Canoga Park, CA 91304

QBE/Westwood Insurance  
8407 Fallbrook Ave., Stes, 150, 200, and 270  
Canoga Park, CA 91304

Platinum Group of Companies, Top Finance  
8407 Fallbrook Ave., Ste, 250  
Canoga Park, CA 91304

Trimana Café  
8411 Fallbrook Ave.  
Canoga Park, CA 91304

Fiserv  
8413 Fallbrook Ave.  
Canoga Park, CA 91304

Central Plant for West Hills campus  
8415 Fallbrook Ave.  
Canoga Park, CA 91304

**Occupant: Parcel Number 2005-002-013**

No occupants at this time (facility under development)

**Occupant: Parcel Number 2005-002-901 (via Postal Service)**

LAPD - Valley Communications Dispatch Center  
23001 Roscoe Blvd.  
Canoga Park, CA 91304





2017



MAPPING AND GIS  
SERVICES  
SCALE 1" = 300'



Matthew Rodriguez  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Barbara A. Lee, Director  
9211 Oakdale Avenue  
Chatsworth, California 91311



Edmund G. Brown Jr.  
Governor

December 15, 2017

Mr. Daniel S. Samorano  
Raytheon Company  
1151 East Hermans Road  
TU, Bldg 826  
Tucson, AZ 85706

RAYTHEON CANOGA PARK SITE – 8433 FALLBROOK AVENUE, CANOGA PARK, CA  
91304

Dear Mr. Samorano:

The Department of Toxic Substances Control (DTSC) received a notification from the Los Angeles Regional Water Quality Control Board (LARWQCB) regarding its determination to provide groundwater closure for the Southern Parcels at the Raytheon Site (Site) based on the information provided in the *Confirmation Sampling Report for No Further Action Status in the Southern Parcels* (Report) dated July 31, 2012. Please be aware that DTSC is the designated lead regulatory agency to oversee the corrective action at this facility.

Because DTSC does not have an agreement with Raytheon, DTSC cannot conduct a thorough review of the Report or determine whether requirements are met to provide closure for the southern parcels. Based on a limited review, DTSC has provided comments below.

Additionally, as previously stated in discussions with Raytheon, the Areas of Concern (AOCs) identified in the RCRA facility Assessment Report dated January 30, 2008 requires investigation. Please contact DTSC Project Manager, Jessy Fierro, to discuss entering into a Corrective Action Consent Agreement.

If you have any questions, please contact Jessy Fierro at (818) 717-6563 or me at (818) 717-6539.

Sincerely,

Juli Propes  
Acting Branch Chief  
Brownfields and Environmental Restoration Program – Chatsworth Office



## DTSC COMMENTS

Document: *Confirmation Sampling Report for No Further Action Status in the Southern Parcels* (Report) dated July 31, 2012

1. Section 2.1 discusses previous characterization. Soil sampling was apparently conducted in August 1993 at borings B-RNDM-3, B-SL-8, and B-SL-10. The DTSC Geologic Service Branch (GSB) recommends that a map showing the location of these borings be attached to the confirmation sampling report. Additionally, it appears that no soil samples have been collected from within the area identified as the expected source of the Freon 11 contamination. Also, no soil impacted with Freon 11 was removed from the expected source area. However, the confirmation soil vapor samples collected in 2011 indicate that Freon 11 in soil vapor had decreased in the expected source area since soil gas samples first collected in 1995.
2. The last apparent groundwater sampling from existing wells in this area was in 2012. Monitoring well MW-31, located within the Freon 11 source has had reported concentrations less than the Freon-11 MCL since approximately 2000. As shown on Graph 1 data since approximately 2006 has shown a slightly increasing trend of Freon-11 with the last sample from April 30, 2012 to be 120 ug/L (see Table 2). Current groundwater concentrations are unknown since there is no reported data for the last 5 years. The GSB recommends that the existing groundwater monitoring wells in the area be resampled for VOCs prior to the LA RWQCB granting an NFA and allowing abandonment of the wells.
3. Table 1 - DTSC does not recommend using the Environmental Screening Levels (ESLs) established by Regional Water Quality Control Board, San Francisco Region (SFRWQCB), as these values are not representative of Southern California conditions. Soil gas screening levels (SLs) should be developed using DTSC Human Health Risk Assessment (HHRA) Note 3. If SLs are not available in HHRA Note 3, then DTSC recommends using USEPA Regional Screening Levels (RSLs). PCE showed slight exceedances for future residential scenario but no exceedance for future industrial use.

Please contact the following DTSC staff for questions regarding these comments:

Wendy Arano, PG – DTSC Geologist: [Wendy.Arano@dtsc.ca.gov](mailto:Wendy.Arano@dtsc.ca.gov)  
Donald Greenlee, PhD – DTSC Toxicologist: [Donald.Greenlee@dtsc.ca.gov](mailto:Donald.Greenlee@dtsc.ca.gov)  
Jessy Fierro – Project Manager: [Jessy.Fierro@dtsc.ca.gov](mailto:Jessy.Fierro@dtsc.ca.gov)