

2008 SWPPP ANNUAL EVALUATION REPORT

This Report was prepared for The Boeing Company (Boeing) Santa Susana Field Laboratory (SSFL), located in Simi Hills, Ventura County, California (Site) and in general accordance with Attachment B (Section A.9.d.) of the Site's Waste Discharge Requirements (National Pollutant Discharge Elimination System (NPDES) Permit No. CA0001309 and Monitoring and Reporting Program No. 6027). This document evaluates compliance with the Site-Wide Storm Water Pollution Prevention Plan (SWPPP) during 2008. The evaluation was conducted by Eric Walker (consultant for Boeing). The evaluation was conducted from January 8th - 25th, 2009 for the period of January 1 through December 31, 2008.

On November 9, 2007, the Los Angeles Regional Water Quality Control Board (Regional Board) issued the 2007 NPDES Permit No. R4-2007-0055 to revise the existing 2006 NPDES Amendment Permit No. R4-2006-0036. The 2007 Permit stipulates additional monitoring and reporting requirements that were observed on and after the 2007 Permit's effective date, December 20, 2007. Boeing anticipates receipt of a revised permit from the Regional Board in May 2009. A revised SWPPP will be submitted to the Regional Board in accordance with the terms of the new 2009 Permit after it is issued.

Review of Visual Observations Records and Sampling and Analysis Results

The evaluators reviewed all inspection forms that documented inspections/visual observations for 2008. Each inspection form was complete. A process exists for items of non-compliance to be properly evaluated and adjusted to correct these items.

Sampling and analysis results are evaluated in each quarterly monitoring report and summarized in this 2008 Annual NPDES Discharge Monitoring Report.

Potential Pollutant Source Visual Inspection

Visual inspections at the Site were conducted in 2008 from January through May and September through December at buildings, equipment, and surrounding areas to evaluate if any pollutant sources exist. Areas where known potential pollutants exist contain Best Management Practices (BMPs) to minimize and/or eliminate the potential for pollutant releases. No other areas were noticed requiring additional BMPs.

Best Management Practice (BMP) Review

As noted above, the Site has been inspected several times throughout 2008. As a result, BMPs were reviewed and evaluated to see if they were adequate, properly implemented and maintained, or whether additional BMPs are needed. Items that required repair, upgrades, and/or maintenance were identified on the inspection forms. Subsequent inspections noted that they were fixed or upgraded.

In addition, Boeing completed SWPPP reviews, updates, and inspections in accordance with facility and project-specific SWPPPs and BMP Plans (BMPPs). These documents, which are maintained per regulatory requirements, were updated in 2008 to better document Boeing's proactive efforts to mitigate the effects of the Topanga Wildfire and to minimize the potential for sediments, constituents, or onsite activities to impact surface water. Boeing's continued effort to improve and upgrade BMPs at SSFL demonstrates commitment to address previous exceedances and improve surface water discharge quality as indicated in the quarterly reports and summarized in the 2008 Annual Report.

SWPPP Revisions and Schedule

As noted above, the 2007 Permit was issued to Boeing on November 9, 2007 and became effective on December 20, 2007. The Site-Wide SWPPP will be updated in accordance with the terms of the 2009 Permit, likely to be issued in May 2009. In addition to the 2009 Permit requirements, changes since the last version (March 2008) have occurred that merit amending the current Site-Wide SWPPP, including chemical volume changes, storm water staff changes, and structural changes due to the ongoing decommissioning site activities. The updated SWPPP will be submitted to the Regional Board following receipt of the new 2009 Permit.

Non-Compliance Incidents and Corrective Actions Taken

Non-compliance issues and corrective actions are listed in this 2008 Annual Report. In addition to those items, the following items were also noted and corrected as a result of the annual inspection conducted in September 2008.

- All above ground storage tanks and pressure vessels are undergoing records review and/or physical inspection to determine contents, pressurization, and condition status. Following review/inspection, a marking is being painted on the vessel identifying its usage status.
- Lids and tarp covers on trash bins and large storage containers are being replaced, when necessary, during the rainy season.
- General housekeeping in some areas was, and continues to be, improved.
- Materials were covered prior to each rain event during the rainy season.
- Drains and catch-basins were maintained periodically throughout year.