



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Agency Secretary

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Arnold Schwarzenegger  
Governor

July 30, 2009

Mr. Thomas D. Gallacher  
Director, SSFL – Environment, Health & Safety  
The Boeing Company  
Santa Susana Field Laboratory  
5800 Woolsey Canyon Road  
Canoga Park, CA 91304-1148

**COMMENTS ON STORM WATER POLLUTION PREVENTION PLAN FOR INTERIM SOURCE REMOVAL ACTION SUBMITTED IN RESPONSE TO A 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)**

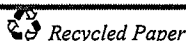
Dear Mr. Gallacher:

Los Angeles Regional Water Quality Control Board (Regional Board) storm water and remediation staff have reviewed the June 17, 2009, *Storm Water Pollution Prevention Plan (SWPPP)* submitted in response to a California Water Code Section 13304 Order dated December 3, 2008. The SWPPP, prepared for you by MWH Americas, Inc., was received by the Regional Board on June 22, 2009.

Regional Board staff have the following comments:

- I. The SWPPP was not signed and was not certified as required by Section C. 10 of General Permit No. CAS000002 (Order No. 99-08-DWQ) for storm water discharges associated with construction activities.
- II. Page 300-1, Where are outfalls 008 and 009 on the figures?
- III. Pollutants:
  1. Page 300-1, States pollutants benchmark exceedances at:
    - Outfall 008 – to be lead
    - Outfall 009 – to be copper, lead, dioxins, pH, oil and grease
  2. Page 500-1, Section 500.3.1, cadmium, copper, lead, and mercury are listed as pollutant sources,
  3. Page 600-2, Section 600.5.1, second bullet states:
    - Outfall 008 and – Outfall 009 areas have soil with cadmium, copper, lead, mercury and dioxins.
  4. Figure 5 indicates: detection of lead, copper, and dioxins in the subsurface soil.

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Please clarify the discrepancies in items 1-4 above.

IV. Page 300-2, Section 300.4:

1. Rainy season starts October 1<sup>st</sup> not October 15<sup>th</sup>.
2. Best Management Practices (BMPs) should be implemented prior to land disturbance, and maintained during construction.
3. BMPs should be in place during construction regardless if it is or is not rainy season.

V. Page 300-3, Section 300.5, first part:

1. Should be revised to read: **The Storm Water Pollution Prevention Plan Manager (SWPPPM)**. A SWPPP should be prepared for the project first and then someone should manage the plan. Please make the necessary acronym changes throughout the document.
2. Please clarify if Mr. Ben Stewart, the SWPPPM will be available at the construction site during all working hours. If not, please specify the name of the person responsible for the SWPPP/BMPs who will be at the construction site.
3. Ninth line from the top, typo: "The SWPPM ..." should be SWPPP.

VI. Page 500-2, Section 500.3.4

1. No. 2: "...to remaining active and non active areas..." It is not clear if the active refers to disturbed areas and if non active refers to undisturbed areas. If an area has been disturbed and becomes temporarily inactive, it must still have effective BMPs.
2. No. 4: Similar comment. Do the non-active areas mean previously disturbed, not at all disturbed, or will be disturbed in the future? If the area has been previously disturbed, it should be stabilized immediately and not "14 days after the cessation of activities."
3. No. 6: All disturbed areas must be stabilized immediately upon completion. Again, the permit requirement should be implemented year around and not only "during the rainy season."

VII. Page 500-6, Section 500.3.9, WM-5 Solid Waste Management

1. Third and fourth dashed lines: These dashed lines may be combined in order to explain the type of dumpsters used at the site.

VIII. Page 500-7

1. Fourth dashed line: Please explain when the solid waste will be removed from the site.
2. WM-6 Hazardous Waste Management, last dashed line: How will the "accumulative rainwater that has (been) mixed with hazardous waste" be disposed?

IX. Page 500-8

Please note that portable toilets should be placed on the secondary containment.

X. Page 500-8, and Page 600-1, Section 600.1, Site Inspections

1. Please clarify if the contractor will be the same as the SWPPPM as stated on Page 300-3, Section 300.5, 1<sup>st</sup> paragraph. The General Permit requires that person(s) responsible for SWPPP implementation, including inspection, shall be named with their responsibility clearly stated.
2. After each storm event inspection should be done regardless of any runoff from the site due to the storm event.

XI. Appendix L

The inspection check list shall include, at a minimum, items (a) through (f) of Section A.11 of the General Permit. Also, the check list should clearly indicate if the inspection was done before, during, or after the rain event.

**Please telephone Mr. Peter Raftery at (213) 576-6724 or email him at [praftery@waterboards.ca.gov](mailto:praftery@waterboards.ca.gov) if you have any questions.**

Sincerely,



Tracy J. Egoscue  
Executive Officer

cc: Honorable Alex Padilla, Senator 20th District  
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Honorable Tony Strickland, Senator 19th District  
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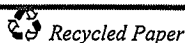


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Mr. Wayne Lee  
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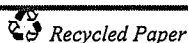


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Mr. Thomas D. Gallacher  
The Boeing Company

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July 30, 2009

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Los Angeles and San Gabriel Rivers Watershed Council  
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Los Angeles County, Department of Public Works, Environmental Programs Division  
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NOAA, National Marine Fisheries Service  
Simi Valley Library  
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ULARA Watermaster  
Ventura County Air Pollution Control District  
Ventura County Environmental Health Division  
Ventura County Public Works  
Water Replenishment District of Southern California

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