



BUILDING A BETTER WORLD

# MEMORANDUM

TO: Art Lenox/Lori Blair, Boeing  
Allen Elliott/Steve Slaten, NASA

DATE: August 31, 2009

CC: Rick Lainhart, ACOE  
Bill McElroy, CH2M HILL

REF: 1891614

FROM: Dixie Hambrick/Alex Fischl, MWH

SUBJECT: Response to RWQCB Comments on ISRA Storm Water Pollution Prevention Plan

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This memorandum provides responses to the Regional Water Quality Control Board (RWQCB) comments on the Interim Source Removal Action (ISRA) Storm Water Pollution Prevention Plan (SWPPP). The ISRA SWPPP was one of the supplemental plans prepared by MWH on behalf of The Boeing Company (Boeing) and the National Aeronautics and Space Administration (NASA) pursuant to a California Water Code Section 13304 Cleanup and Abatement Order (CAO) issued by the Los Angeles Regional Water Quality Control Board (RWQCB) dated December 3, 2008 (RWQCB, 2008). This memorandum was prepared by MWH on behalf of Boeing and NASA to respond to RWQCB comments on the SWPPP (Attachment 1 to this memorandum). Comments from the RWQCB on the SWPPP are reproduced below in their entirety, and responses are provided below each comment. A revised SWPPP that incorporates the changes indicated in the response to comments provided below has also been prepared. The revised SWPPP, dated August 14, 2009, was previously hand delivered to the RWQCB on August 17, 2009.

## **RWQCB SWPPP COMMENTS (Dated July 30, 2009)**

***RWQCB Comment #1:*** *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.*

**Response:** Comment noted. The revised SWPPP includes all signatures and certifications; see *Page 100-1, Section 100.1 and Page 100-2, Section 100.2.*

**RWQCB Comment #2:** *Page 300-1, Where are outfalls 008 and 009 on the figures?*

**Response:** Comment noted. SWPPP figures have been revised to include Outfalls 008 and 009.

**RWQCB Comment #3:** *Pollutants:*

1) *Page 300-1, States pollutant 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 at 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.*

*Please clarify discrepancies in items 1 – 4 above.*

**Response:** Comment noted. SWPPP text on *Page 300-1, Section 300-1* has been revised to clarify these exceedances refer to surface water results.

SWPPP text on *Page 500-1, Section 500.3.1* has been revised to clarify that metals including cadmium, copper, lead, and mercury in soils within the Outfall 009 watershed, and copper and lead in soil within the Outfall 008 watershed are potential ISRA constituents of concern (COCs) in soil that have the potential to contribute pollutants to storm water runoff.

SWPPP text on *Page 600-2, Section 600.5.1*, has been revised to explain that ISRA Outfall 008 COCs exceeding background comparison concentration in soil are copper, lead, and dioxins, and Outfall 009 COCs exceeding background comparison concentration in soil are cadmium, copper, lead, mercury and dioxins, and these COCs are potential sources of non-visible pollutants to storm water discharges from the project sites.

SWPPP Figure 5 has been revised to identify potential ISRA COCs including lead, copper, and dioxins that exceed the background comparison concentrations in soil within the proposed Happy Valley Area (Outfall 008 watershed). SWPPP Figure 7 has been revised to identify

potential ISRA COCs including cadmium, copper, lead, mercury and dioxins that exceed the background comparison concentrations in soil within the proposed ELV Area (Outfall 009 watershed).

**RWQCB Comment #4:** Page 300-2, Section 300.4:

- 1) *Rainy season starts October 1<sup>st</sup> not October 15<sup>th</sup>.*

**Response:** Comment noted. SWPPP text on Page 300-2, Section 300.4 has been revised.

- 2) *Best Management Practices (BMPs) should be implemented prior to land disturbance, and maintained during construction.*

**Response:** Comment noted. Below is a clarification of the SWPPP text on Page 300-2, Section 300.4. Implementation of non-stormwater and waste management BMPs began on 8/11/09, prior to excavation or other land disturbance activity. Installation of these BMPs for an ISRA area will be completed prior to any excavation in that area. Stormwater BMPs, including soil stabilization and sediment control, will be implemented at the start of the rainy season (10/1/09) and maintained throughout the rainy season (4/15/10). Non-stormwater and waste management BMPs will continue to be maintained following the rainy season and throughout the year, as necessary, even though excavation and land disturbance activities in the area may be complete.

- 3) *BMPs should be in place during construction regardless if it is or is not rainy season.*

**Response:** Comment noted. Below is a clarification of the SWPPP text on Page 300-2, Section 300.4. Non-stormwater and waste management BMPs will be implemented prior to excavation or other land disturbance activities and maintained following the rainy season and throughout the year, as necessary, even though excavation and land disturbance activities in the area may be complete.

**RWQCB Comment #5:** 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.*

**Response:** Comment noted. SWPPP text has been revised to incorporate the acronym change throughout the document. However, the California Stormwater Quality Association (CASQA) construction SWPPP guidelines identify the primary responsible person for the implementation, maintenance, inspection and amendments to the approved SWPPP as a Storm Water Pollution Prevention Manager (SWPPM).

- 2) *Please clarify if Mr. Ben Stewart, the SWPPM 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.*

**Response:** SWPPP text on Page 300-3, Section 300.5 has been revised to identify Jim Hickle as the SWPPM. The SWPPM and a copy of the approved SWPPP will be available at the construction site during all working hours throughout the duration of the project.

- 3) *Ninth line from the top, typo: "The SWPPM..." should be SWPPP.*

**Response:** Comment noted. SWPPP text on Page 300-3, Section 300.5 has been revised.

**RWQCB Comment #6:** 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.*

**Response:** Comment noted. SWPPP text on Page 500-2, Section 500.3.4 has been revised to state that soil stabilization practices on active and non active disturbed areas will have effective BMPs for erosion control. If an area becomes temporarily inactive, erosion control methods will be applied.

- 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."*

**Response:** Comment noted. SWPPP text on *Page 500-2, Section 500.3.4* has been revised to state that erosion control methods at active and non active disturbed areas will be stabilized immediately and reapplied, as necessary, to maintain effectiveness.

- 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.”*

**Response:** Soil stabilization is a stormwater BMP and, therefore, will be implemented and maintained during the rainy season. Construction BMPs will be implemented and maintained throughout the year

***RWQCB Comment #7: 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.*

**Response:** Comment noted. SWPPP text on *Page 500-7* has been revised by combining the third and fourth dashed lines of *Section 500.3.9*.

***RWQCB Comment #8: Page 500-7***

- 1) *Fourth dashed line: Please explain when the solid waste will be removed from the site.*

**Response:** Comment noted. SWPPP text on *Page 500-7, Section 500.3.9* has been revised to state that solid waste will be removed by dump truck and disposed of offsite by the Boeing solid waste contractors on an as needed basis or at the end of field activities.

- 2) *WM-6 Hazardous Waste Management, last dashed line: How will the “accumulative rainwater that has (been) mixed with hazardous waste” be disposed?*

**Response:** Comment noted. SWPPP text on *page 500-7, Section 500.3.9* has been revised to state that in the event that accumulated rainwater is mixed with hazardous wastes, the rainwater will be sampled and analysed for the specific waste characterization requirements and disposed of properly as stated in the previously submitted *Soil Management Plan* by MWH dated July 2009.

**RWQCB Comment #9:** Page 500-8.

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

**Response:** The CASQA Stormwater Best Management Practice Handbook section WM-9 Sanitary/Septic Waste Management does not require secondary containment for temporary sanitary facilities. Temporary sanitary facilities will be placed on an impervious surface if available at the project site, and will be cleaned and serviced on a weekly basis.

**RWQCB Comment #10:** 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 the person(s) responsible for SWPPP implementation, including inspection, shall be named with their responsibility clearly stated.*

**Response:** Comment noted. SWPPP text on Page 600.1, Section 600.1 has been revised to identify the individuals who will be conducting the inspections. The SWPPPM will oversee the SWPPP inspectors or conduct the SWPPP inspections themselves, as needed.

- 2) *After each storm event inspection should be done regardless of any runoff from the site due to the storm event.*

**Response:** Comment noted. To clarify, SWPPP inspections will be conducted after each rain event regardless if the rain event causes runoff from the construction site. A rain event is defined in the NPDES Permit as 0.1 inch of rain during a 24-hour period.

**RWQCB Comment #11:** 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.*

**Response:** Comment noted. SWPPP Appendix J, the Storm Water Quality Construction Site Inspection Checklist, has been revised to include items (a) through (f) of Section A.11 of the General Permit, including check boxes to clearly indicate when the inspection was completed.

*Attachment 1 - Letter from Tracy Egoscue, RWQCB, to T. Gallagher, Boeing regarding 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). July 30, 2009.*