



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

July 30, 2009

Attachment 1
Response to RWQCB SWPPP Comments

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.

California Environmental Protection Agency



Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Please clarify the discrepancies in items 1-4 above.

IV. Page 300-2, Section 300.4:

1. Rainy season starts October 1st not October 15th.
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, 1st 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 if you have any questions.

Sincerely,



Tracy J. Egoscue
Executive Officer

cc: Honorable Alex Padilla, Senator 20th District
Honorable Fran Pavley, Senator, 23rd District
Honorable Tony Strickland, Senator 19th District
Assemblymember Bob Blumenfield, Assemblymember 40th District Assembly
Assemblymember Pedro Nava, Assemblymember 35th District
Assemblymember Audra Strickland, Assemblymember 37th District

cc list continues on next page

California Environmental Protection Agency

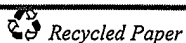


cc list continued

Mr. Jarrod Degonia, c/o Assemblymember Cameron Smyth
Ms. Rondi Guthrie, c/o Assemblywoman Audra Strickland
Ms. Samantha Stevens, c/o Assemblymember Bob Blumenfield
Mr. Aron Miller, c/o Senator Fran Pavley
Ms. Linda Parks, Ventura County Board of Supervisors
Mr. Damon Wing, c/o Ms. Linda Parks, Ventura County Board of Supervisors
Mr. Gerard Abrams, Department of Toxic Substances Control, Sacramento
Mr. David Beckman, National Resources Defense Council
Ms. Lori Blair, Boeing
Mr. William Bowling
Mr. Michael Bubman, c/o Bell Creek Homeowners Association
Ms. Jeannie Chari
Mr. Paul Costa, Boeing
Mr. Craig Cooper, Environmental Protection Agency, Region 9
Mr. Daniel Cooper, Lawyers for Clean Water
Mr. David Cooper, Environmental Protection Agency, Region 9
Ms. Elizabeth Crawford
Ms. Nicole Doner, Ventura County Planning Division
Ms. Ginn Doose
Mr. Allen Elliott, National Aeronautics and Space Administration
Mr. John Farrow, M. R. Wolfe & Associates, P.C.
Ms. Merrilee Fellows, National Aeronautics and Space Administration
Mr. Tom Ford, Santa Monica Bay Keeper
Dr. Mark Gold, Heal the Bay
Mr. A. J. Greenstein
Mr. Matt Hagemann, Soil/Water/Air Protection Enterprise
Ms. Carol Henderson, Office Manager, Bell Canyon Homeowners Association
Mr. Dan Hirsch, Committee to Bridge the Gap
Ms. Heather L. Hoecherl Esq., Director of Science and Policy, Heal the Bay
Mr. Philip Isorena, State Water Resources Control Board, Division of Water Quality
Ms. Kirsten James, MESM, Staff Scientist, Heal the Bay
Ms. Stephanie Jennings, United States Department of Energy
Ms. Barbara Johnson, Susana Knolls Homeowners, Inc.
Dr. Michael Josselyn, WRA, Inc.
Mr. Thomas Johnson, ETEC Project Manager, United States Department of Energy
Ms. Teresa Jordan
Mr. Thomas Kelly, Environmental Protection Agency, Region 9, (WTR-5)
Dr. Jae Kim, Tetra Tech
Mr. Buck King Department of Toxic Substances Control, Sacramento
Ms. Bonnie Klea
Mr. Wayne Lee
Mr. Michael Levy, State Water Resources Control Board, Office of Chief Counsel

cc list continues on next page

California Environmental Protection Agency



cc list continued

Mr. Michael Lopez, U.S. Department of Energy, Oakland
Mr. John Luker
Ms. Carissa Marsh, The Simi Valley Acorn
Ms. Marie Mason
Mr. Daniel Maccabee, Brandeis-Bardin Institute
Mr. Nicole Moutoux, Environmental Protection Agency, Region 9
Mr. Jerry Murphy, c/o Bell Creek Homeowners Association
Mr. Jim Pappas, Department of Toxic Substances Control, Sacramento
Mr. William Paznokas, Department Of Fish and Game, Region 5
Mr. Sheldon Plotkin, Southern California Federation of Scientists'
Ms. Bunny Raskin
Mr. Norm Riley, Department of Toxic, Substances Control, Sacramento
Ms. Chris Rowe
Ms. Sharon Rubalcava, Weston, Benshoof, Rochefort, Rubalcava, MacCuish, LLP
Ms. Darlene Ruiz, Hunter Ruiz Research, Consulting and Advocacy
Mr. Adam Salkin
Mr. Mathew Sanders, Paul, Hastings, Janofsky & Walker LLP
Ms. Lorraine Scott
Mr. Joseph Smith, Department of Toxic Substances Control, Office of Legal Counsel
Sacramento
Dr. Michael Stenstrom, SSFL Stormwater Expert Panel
Ms. Rebecca Tadesse, Branch Chief of Materials Decommissioning, U.S. Nuclear Regulatory
Commission
Ms. Stephanie Trotter, State Water Resources Control Board
Mr. Rick Verguitz, Water & Environmental Resources Section, Ventura County Watershed
Protection District
Mr. Mati Waiya, Wishtoyo Foundation
Mr. Jack M. Wallace
Ms. Christina Walsh
Ms. Marge Weems
Ms. Darla Weiss, Ventura County Watershed Protection District
Ms. Mary Wiesbrock
Dr. Daniel Wiseman, West Hills Neighborhood Council-Santa Monica Mountains Area
Committee
Mr. Anthony Zepeda
Mr. Cybil Zeppieri
Mr. Lori Zinkan
Ms. Elizabeth Zlotnik
California Coastal Commission, South Coast District
California State University, Northridge
City Manager, City of Simi Valley
City of Los Angeles, Bureau of Engineering, Wastewater Systems Engineering Division

cc list continues on next page

California Environmental Protection Agency



Mr. Thomas D. Gallacher
The Boeing Company

- 6 -

July 30, 2009

Attachment 1
Response to RWQCB SWPPP Comments

cc list continued

Department of Health Services, Public Water Supply Branch
Department of Interior, U.S. Fish and Wildlife Service
Environmental Protection Agency, Region 9, Office of Radiation Programs
Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Friends of the Los Angeles River
Los Angeles and San Gabriel Rivers Watershed Council
Los Angeles County, Department of Health Services
Los Angeles County, Department of Public Works, Environmental Programs Division
Masry & Vititoe Law Offices
NOAA, National Marine Fisheries Service
Simi Valley Library
The Boeing Company Santa Susana Field Laboratory
U.S. Army Corps of Engineers
ULARA Watermaster
Ventura County Air Pollution Control District
Ventura County Environmental Health Division
Ventura County Public Works
Water Replenishment District of Southern California

s:\Inewshareddrive\folders\site cleanup\i unit\shared\pj\rest\outfalls 008 and 009 related\response to swppp july09.doc

California Environmental Protection Agency



Recycled Paper

.Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.