

**LIST OF MAJOR CHANGES IN TENTATIVE NPDES PERMIT FOR  
THE BOEING COMPANY,  
SANTA SUSANA FIELD LABORATORY  
(NPDES NO. CA0001309)**

**Changes related to Discharges**

1. Removed authorization to discharge treated groundwater to the surface via Discharge Points 019 and 020. Treated groundwater from the Groundwater Extraction Treatment System (GETS) is reinjected. Therefore, there are no longer any permitted dry-weather discharges to surface water from the site. The following changes are proposed as a result:
  - a. Removal of effluent limitations and monitoring and reporting requirements for Discharge Points 019 and 020 (note that Discharge Point 020 was never constructed). Discharge Point 019 is downstream of Discharge Point 001 and was associated with discharge of treated groundwater from the GETS. Any future surface discharge from the GETS would be a violation of the permit. (See, Attachment F, section 2.2.)
  - b. Removal of effluent limitations for total suspended solids (TSS) and settleable solids at Discharge Points 011 and 018 as these were only applicable to dry-weather discharges. Removal of benchmarks for TSS and settleable solids at Discharge Points 001 and 002. (See, Attachment F, section 4.4.2.)
  - c. Removal of the dry-weather effluent limitations for cadmium at Discharge Points 011, 018, and 008. Removal of dry-weather benchmarks for cadmium at Discharge Points 001 and 002. The previous Order included dry- and wet-weather limitations for cadmium, however, the Los Angeles River Metals TMDL only contains a wet-weather waste load allocation (WLA for cadmium) applicable to stormwater discharges. The effluent limitations and benchmarks for stormwater discharges will remain unchanged.
  - d. Removal of both the dry- and wet-weather effluent limitations for selenium at Discharge Points 011, 018, and 008. Removal of benchmarks for selenium at Discharge Points 001 and 002. The previous Order included dry- and wet-weather limitations for selenium, however, the Los Angeles River Metals TMDL only contained a dry-weather WLA for selenium and dry-weather discharges are no longer permitted as noted above.
2. Removed references to storage tanks and transfer of runoff at Discharge Points 012-014. Discharge Points 012-014 were removed from the permit in 2015 because stormwater runoff from these areas is captured by best management practices (BMPs) in the case of Discharge Point 014, or is conveyed to Silvernale Pond, where the runoff is treated and discharged at Discharge Point 018.

## **Changes related to Effluent Limitations and Benchmarks**

1. Removed the effluent limitations for iron and manganese from Discharge Points 011 and 018. Removed benchmarks for iron and manganese at Discharge Points 001 and 002. Based on background conditions, iron and manganese concentrations are likely from soils that are naturally occurring and not related to past industrial activity that occurred at the site. This is addressed in more detail in the Fact Sheet in the sections on Anti-backsliding requirements (section 4.4.1) and Antidegradation policies (section 4.4.2).
2. Removed the effluent limitations for antimony, mercury, nickel, and thallium for Discharge Point 008 because recent monitoring data did not demonstrate reasonable potential for the discharge to cause or contribute to an exceedance of water quality standards for these constituents. (See, Attachment F, section 4.4.2.)
3. The effluent limitations for nickel were also removed for Discharge Points 011 and 018 because monitoring data did not demonstrate reasonable potential for the discharge to cause or contribute to an exceedance of the water quality standards for nickel. The benchmarks for nickel were also removed at Discharge Points 001 and 002 for the same reason.
4. The proposed effluent limitations and benchmarks for copper, lead, and zinc are less stringent than in the prior permit for Discharge Points 001, 002, 011, 018 and 008 to make the permit consistent with the LA River Metals TMDL. This is addressed in more detail in the Fact Sheet's Anti-backsliding and Antidegradation sections (sections 4.4.1 and 4.4.2, respectively).
5. The proposed effluent limitations for copper and nickel are less stringent and the proposed effluent limitations for mercury are more stringent than in the prior permit for Discharge Points 003 through 007, 009, and 010 to make the permit consistent with the Calleguas Creek Metals TMDL. This is addressed in more detail in the Fact Sheet's Anti-backsliding and Antidegradation sections (sections 4.4.1 and 4.4.2, respectively).
6. The effluent limitation for temperature has been updated from 86 °F to 80 °F to align with the temperature water quality objective in the Basin Plan applicable to inland surface waters with warm water aquatic habitat (the "WARM" beneficial use designation in the Basin Plan).

## **Changes related to Monitoring**

1. Added requirements to monitor the stormwater entering the two stormwater treatment systems ("influent") to screen for potential constituents that may be present in stormwater runoff from different areas of the site, which as the stormwater is conveyed into the Silvernale and R-1 detention ponds prior to treatment. (See, Attachment E, section 3.)

2. Modified the species sensitivity screening requirements for aquatic toxicity testing based on language from the Statewide Toxicity Provisions.
3. Added a requirement to sample for asbestos at Discharge Points 003-007, 009, and 010 due to the proximity to on-going demolition activity and landfill areas that have known sources of construction materials in the northern portion of the site.
4. Removal of in-stream bioassessment monitoring during dry weather since there is no dry-weather discharge from the site.
5. Revised language to specify that no additional daily sampling for *E. coli* is required at monitoring location RSW-002 (Frontier Park, 4 miles from SSFL) when there is no observed discharge from the site.