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SPECIAL HEARING
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106. Boeing

February 18, 2005

Ms. Debbie Irvin
Clerk of the Board
State Water Resources Control Board
1001 "I" Street, 24th Floor
Sacramento, CA 95814

BOEING

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Dear Board Members:

The Boeing Company appreciates the opportunity to provide written comments to the California Water Resources Control Board concerning the re-issuance of the National Pollutant Discharge Elimination System General Permit for Discharges of Storm Water Associated With Industrial Activities (Industrial General Permit). These written comments are in support and in addition to those provided at the February 3rd presentations by Nancy Sheps, Senior Manager, Safety, Health and Environmental Affairs for our Long Beach C-17 facility.

The Boeing Company has an extensive presence in California. Boeing has 14 major manufacturing or engineering facilities employing approximately 34800 personnel. This makes Boeing one of the largest private manufacturing employers in California Boeing also has 8718 California suppliers/ vendors with an estimated business to business commerce of 6.38 billion dollars in 2004.

Nationally, the Boeing Company has facilities in nearly every state. This broad exposure has resulted in a wealth of experience in addressing storm water as both policy issues and technical implementation challenges. We have a national working group of professional engineers who exchange information on a monthly basis dealing with these type of issues. During the testimony before the board we heard issues that have been challenges in other states. In the following attachments Boeing will offer suggestions on solutions that have been found viable in these other states and the Federal multi-sector general permit. These attachments will address:

1. Water Quality Standards: A conflict does not exist between the Clean Water Act requirement to meet water quality standards and the nationally accepted use of Best Management Practices as a means to control stormwater. Numeric standards are not required as the CWA allows, and the

courts recognize that narrative water quality standards are acceptable alternatives to numeric standards. This approach is not only accepted, but is the basis for the EPA's national stormwater management program.

2. Clear Compliance Standards: Permittees, inspectors and consultants can agree on one thing; inconsistent application of permit requirements is the norm- not the exception. Permittees should be given clear guidance on the types of BMPs applicable to their facilities and recommendations on how to employ them. Inspectors and consultants need training in these BMP approaches and how to consistently apply them.

3. Technical Assistance: Small and medium permittees rarely have the resources available to a large company like Boeing to design, implement and maintain storm water BMPs. Small businesses in particular tend to need technical assistance from state or local agency resources in order to jump start their SWPPPs and BMPs.

4. Reasonable Sampling and Inspections Protocols: Storm water sampling and site inspections are significant tools in the effort to reduce pollutant discharge. They are most effective when producing a periodic sampling consistent with statistical analysis needs.

5. Permit Costs and Environmental Benefits: Permittees must feel that the fees they are paying have a definable and equitable result. Businesses should expect the agencies to inspect every permittee to the same standard of performance in a reasonable time frame.

6. Systems Approach: In one state 8% of the toxic pollutants being released into state waters were from industrial sources- both process and storm water. The balance of the toxics problem was from POTWs, urban stormwater and other non-point sources. Storm water is a problem that must be addressed through a systems approach across all types of point and non-point sources to maximize results in attaining water quality.

7. Applicability: The regulations must define with specificity those circumstances under which a permittee must obtain an individual NPDES permit for stormwater discharges and the General Permit will not apply. Those specific circumstances must be set forth in the General Industrial Stormwater Permit and applied uniformly throughout the state and individual NPDES permits.

The Boeing Company is committed to protecting our communities and the environment. Should the Board have any questions concerning our comments or wish to discuss other aspects of storm water management please contact Mr. John Netherwood at 714-287-8548 or the undersigned at 562-797-2412.

Kieran Bergin
Director, Safety Health and Environment
Boeing Integrated Defense Systems

Attachment 1:

Water Quality Standards:

The solution suggested here is to recognize that narrative water quality standards are acceptable alternatives to numeric standards. This approach is not only accepted by delegated states, but it is the basis for the national stormwater management program under the Multi-Sector General Permit. The use of narrative standards has evolved since the inception of storm water permitting for several reasons. The Federal statute governing industrial storm water discharge requires the EPA to utilize a point source management approach to manage what is a non-point source - storm water. In comparing the use of individual NPDES industrial permits vs. storm water permits, the EPA and delegated states have found they must consider the inherent inconsistency in application of NPDES individual permits commonly used for industrial process water to those of NPDES general permits for storm water. Key considerations include:

- The traditional point source NPDES program anticipates that the permittee is a discharger of process wastewater and will be able to control not only the content of the discharge, but also its very existence. Thus in traditional process water NPDES permits, a numeric limit for the discharger is rational since they can control the components of the discharge and in severe cases actually cease discharging. Stormwater is the opposite of process storm water in that it comes in unpredictable times, amounts and intensities. While permittees can make significant efforts to remove sources of pollution, they can not control factors such as air deposition or vehicle traffic that contribute to pollution. In effect the general storm water permittee does not control the discharge as anticipated by the process NPDES permit. If they can not control the discharge, then they can not reasonably be expected to control all the factors that impact their discharge. In reality the industrial discharger can only take those actions that minimize discharge pollutants to the extent allowed by available technology (BMPs). Available BMPS effectiveness varies under differing conditions of rain / snow fall. No one or series of BMPS will be effective in removing all pollutants under all weather conditions. Thus, the EPA and States have realized that setting numeric expectations for storm water discharges is both technically unfeasible and economically and practically unachievable.

- The ability to determine if a storm water discharge to receiving water is actually creating a water quality problem is nearly impossible under the NPDES general permit program. Process water industrial permits are normally individual NPDES permits developed for a specific discharger over a period of time. They often include discharge characterization, receiving

water determination and reviews of existing technologies that comply with BCT/BCP and BAT/ea. Under this scenario the discharge impact on the receiving water can be modeled to a fine degree, allowing reasonably precise determination of a reasonable potential to cause a violation of the receiving water quality standard. Under appropriate modeling, numeric limits can be established that reflect a reasonable potential to pollute. The stormwater general permitting process does not contain any of the receiving water characterization needed for an individual permit. With the nine thousand plus permittees it would be both fiscally and physically impossible for the agency to conduct any meaningful studies on each permittee. Many of the permittees are small business without either the technical or financial resources to evaluate their receiving waters. Further complicating the studies would be the large number of discharges to MS4 which are not characterized under any existing permit or process. Yet another factor contributing to the inability to determine if water quality is being violated is the general permit sampling protocol. A grab sample early in a storm discharge is not representative of the actual storm flow from the permittee. Non-representative values derive from two considerations. First, the grab sample is a narrow point in time that does not recognize the discharge conditions that will occur in the following hours. The complexity of storm water drainage system can result in early flows being contaminated compared to later flow or inversely, later flows may have contaminant loads as catch basins are scoured. Only an enormously complex modeling and time weighted sampling could determine the true discharge; the cost and implementation obstacles clearly make such a program impossible. A second challenge is that receiving water quality is a complex function which varies in space and time. Thus a discharge over a numeric limit may or may not actually cause a receiving water to exceed its water quality standards. This is an especially complex determination under the rapidly changing receiving water conditions one would expect during a storm event. Combine this with the general permit sampling requirements of collecting a grab sample early in a storm event and a permittee or inspector would be unable to determine if the discharge is contributing to a water quality violation in receiving waters. This problem contributes to the Federal EPA and many states using narrative water quality standards based on implementation of BMPS as the compliance criteria.

- The state of technology for storm water management is such that narrative water quality standards continue to be the backbone of the EPA's and most states storm water permitting programs. In attempting to merge non-point technology with the point source NPDES permit, the EPA and other states have recognized that the current state of non-point control technology is insufficient for a discharger to attain complete control over the pollutants being discharged. Rather, an effort to implement progressively better technology to utilize as BMPs over time provides the best possible

solution to controlling storm water. Using the narrative water quality standards allows for the development of technology based standards over time. Once we know what we can do with technology on stormwater in terms of BCT/BCP and BAT/ea then we can look at how we can achieve water quality based standards. Until then, any application of water quality based effluent limits is premature and unachievable. Washington State recently passed legislation (HB6514) that has directed the Department of Ecology to study this issue and report back to the legislature as to what water quality standards could be set for storm water discharges. A key element in these determinations will be the technological capability of BMPs to remove pollutants under a range of conditions. Until these and similar studies by the EPA are completed, the only sure way to comply with storm water will be to discharge to a POTW. Hydraulic loading issues for POTWs make this a non-viable option in most localities.

The case for employing narrative water quality standards for storm water discharges is both logical and well founded.

- Storm water does not allow the permittee to control its production or content as anticipated for NPDES process wastewater discharges.
- Characterization of the storm water discharge and receiving water characteristics is necessary prior to assigning a meaningful numeric limit. However, storm water General Permits have such a range and number of dischargers that numeric limits are fiscally and practically impossible.
- The non-point source technology on which to base compliance is not developed or tested to the point where it can be reliably used to meet a numeric limit.

Given these conditions the SWRCB is encouraged to look to narrative water quality standards for at least the term of this permit as the basis for complying with the water quality standard provisions of the Clean Water Act. The SWRCB should consider joining with the EPA and other states to identify technologies and conditions under which numeric standards might reasonably be applied in a manner in which permittees can comply.

Attachment 2

Clear Compliance Standards:

Permittees, inspectors and consultants can agree on one thing; inconsistent application of permit requirements is the norm, not the exception. Permittees should be given clear guidance on the types of BMPs applicable to their facilities and recommendations on how to employ them. This is not the same as requiring minimum BMPs in the permit across the incredibly broad range of permittees. Minimum BMPs embedded in a permit may actually decrease the efforts of permittees to attain the best combination of BMPs for pollutant control. Embedded BMP requirements allow the permittee to implement what is required and consider that they have done what the State says is "enough". The substantial number of small businesses without expertise would consider this a reasonable approach.

Larger business will incur major costs for negligible benefit. For example, diversion of storm water from parking areas will be one of the most expensive items on the new permit. For large facilities such as ours, extensive re-plumbing and channeling of runoff will have to occur. This will require a study, planning and construction that will easily run into hundreds of thousands of dollars per facility. The result of the expenditure will not be improved water quality. The same discharge streams with the same pollutant loads will still exist - they will just meet further down-pipe.

Adaptive management techniques are the key to effective application of BMPs. For example; Boeing has approached the storm water issue using the traditional BMP approach of Source, Structural and Operational controls, supplemented with treatment technology where needed. While Boeing has the relative luxury of professional staff to address storm water issues, it is still a daunting task. Our engineers have access to resources and knowledge that are obviously not available to the average permittee. The challenge then is how to provide a reasonable set of BMPs from which a permittee can select options that will meet basic storm water management goals.

One solution is to develop a list of recommended BMPs for reasonably similar businesses. These are presented to the permittee as the basis for their storm water management program which, if followed, provides them a presumption of compliance with their permit. This presumptive approach both encourages permit compliance and simplifies the inspection process. The recommended BMP listings can be derived from existing California documentation or those developed by the EPA and other states. A stakeholder process or coordination with trade and consultant organizations are viable ways to develop such a list. Over time it can be refined as inspection results and experience are gained.

Although the presumptive BMP list provides a basis for basic BMP actions, it does not preclude the need for additional BMPs should inspections or benchmark sampling indicate a need. In these cases, when a permittee determines a need for additional actions they can look at the recommended list for recommended additional BMPs or treatment options to take. This presumptive approach provides tailored compliance, at minimal costs and confusion to the permittee and the inspecting agencies.

Larger permittees, such as Boeing, may utilize an alternative approach in which they demonstrate that their BMPs provide essentially the same level of pollutant reduction as those recommended in the presumptive approach. This "demonstrative" approach is particularly applicable to facilities that have unique considerations. For example, at our C-17 facility in Long Beach adaptive management was applied as follows:

- Source Control: Using the adaptive management approach we have upgraded our source control to the point where there is minimal exposure of hazardous materials to rain water during normal conditions. This was accomplished by ensuring these materials are stored in covered areas. For those few cases where drummed or other outdoor storage of hazardous materials is unavoidable, we have installed secondary containment.
- Structural Controls: Through our observations of sheet flow, we identified a need to install two large oil/water separators and a storm drain filter as part of our adaptive management approach. The oil water separators have been installed in areas of substantial spill potential, specifically the flight ramp and our vehicle maintenance area. We have installed a storm drain filter in an area that has shown equipment leakage in the past; we have also repaired the leaking equipment.
- Operational Controls: Power sweepers are used daily to maintain a clean plant. Spill control materials are provided in many areas. Employees receive training and bulletins on storm water BMPs. A significant component of our storm water pollution prevention plan is the frequent preventive maintenance for all equipment that could be exposed to storm water.

In summary the following are suggestions for alternative approach to minimum BMPS proposed in the current permit:

- Provide permittees with a list of BMPs generally applicable to their type operations.
- Encourage use of the listed BMPs by setting policy that permittees following the BMP list in a reasonable manner, and otherwise complying with terms of the permit, will not be cited for permit violations. Inspectors will instead provide recommendations on how to select additional BMPs.
- Allow any permittee to demonstrate that their BMPs have the equivalent results as those BMPs on the presumptive list for that type of site.

In following this recommendation an increase in permit compliance and improved water quality can be expected over time as more permittees employ the recommended actions.

Attachment 3:

Technical Assistance:

A robust technical assistance program provides several advantages to the State in creating a successful storm water program. Small and medium permittees rarely have the resources available to a large company like Boeing to design, implement and maintain storm water BMPs. A successful technical assistance program would have the following characteristics:

- Technical assistance is provided as a quick start to permittees who are willing, but technically unable to implement the types of BMPs suggested in attachment 2.
- The program has little or no cost to the permittee
- Waiting times to receive assistance are relatively short.
- Visits are coordinated with the permit holders.
- These visits promote a consistent understanding among permittees as to the value to them and the environment from their actions.
- The permittee will also need to know that they will not be cited by a technical assistance team. They should also be aware that they have a reasonable time frame to take the recommended actions or their equivalent.

Attachment 4

Reasonable Sampling and Inspections Protocols:

Storm water sampling and site inspections are significant tools in the effort to reduce pollutant discharge. Properly employed sampling can provide a range of near and long term benefits in storm water management programs. For example:

- Routine periodic sampling across the seasons provides statistical data for determining likely loadings from a class of permittees. This data that can then be used to adjust future sampling requirements or benchmark values.
- Consistent periodic sampling can provide an initial basis for developing "wet weather" water quality standards,
- When paired with BMP data, sampling supports determination of BMP effectiveness which can be fed back to the permittees. Better BMP information will help select those actions that best reduce pollutants.
- Time and flow weighted sampling provides a clearer picture of what pollutant loads are really coming from a storm water discharge. This data can be used in models to better determine when a reasonable potential to pollute actually exists.

The draft permit has provisions that may not be effective in achieving any of these goals for sampling. In fact, some sampling requirements are impracticable on their face. For example; The permit requires that the permittee identify any pollutant that will be discharged in "significant quantity" to cause or contribute to pollution, contamination or nuisance or cause a violation of water quality standards. This requirement appears to attempt to address discharge's to 303(d) listed waterbodies. It places the burden squarely on the permittee to first identify and screen for any pollutants that might be in the stormwater discharge. The permit then requires the permittee to sample for these additional pollutants. Very few if any permittees are equipped to fully identify all potential pollutants in its storm water discharges. In reality, if discharging to an MS4 it is highly unlikely the permittee will even know where their discharge is going. Also, stormwater discharges vary seasonally and with each event, negating the value of the sample to have any meaningful relationship to the permittees impact on a 303(d) listed waterbody. In sum, this requirement is excessive and not feasible for permittees to implement.
A relatively simple alternative has been piloted in other States. The agency notifies the permittee as to any listed waterbody that receives their discharge. Along with this notice comes a requirement for quarterly sampling of the actual pollutants causing the listing. The permittee uses an action level of a MSGP benchmark or twice the water quality standard as a trigger to take actions to reduce their discharge of the listed pollutant. The agency receives

meaningful data on pollutants of concern in the 303(d) listed waterbody. The permittee is able to focus on reducing the pollutant of concern. Costs and confusion are kept at a minimum for both parties. Some agencies have objected to this approach as they claim they do not have the resources to identify if a discharge is to a listed waterbody. To that we must reply- if the agency professionals can not figure it out, how can they expect an untrained permittee to do it?

Another instance where the sampling requirement is difficult to understand is the difference in the compliance approach between benchmarked parameters and other sampled parameters. The draft permit effectively requires the permittee to review the sampling data and make a determination whether the non- benchmarked parameters are causing or contributing to violation of receiving water standards. A permittee has no real ability to determine if they are contributing to a violation without the characterization data for the receiving water (see attachment 1). Lacking such information or the skill to use it, any decision by the permittee is highly suspect. Thus it is left to the to the RWQCB's determination. If there is no determination of an exceedence by either the permittee or the RWQCB then no further action is required. The permit later restates that it is the responsibility of the RWQCB to ensure compliance with standards. From a practical standpoint each RWQCB can make its own assessment of the potential to exceed, probably with the same lack of characterization data. This would result in various different assessments for the same pollutant in different jurisdictions. It could also be argued that the RWQCB has an affirmative duty to review all sampling data submitted on non benchmarked parameters and make a determination that the data shows there is no potential to cause or contribute to a violation of water quality standards. This could result in numerous citizen suit challenges for failure to enforce.

The requirement in the draft permit to sample on a monthly basis when a sample exceeds benchmarks is inconsistent with the intended use of benchmarks, and borders on converting a benchmark into a numeric limit. Benchmarks are non-regulatory values and cannot be used for the basis for compliance. The draft permits requirement to sample monthly until below a benchmark value is a punitive use of a value never intended to be used as a standard. The EPA's multi-sector general permit preamble clearly states that benchmarks are an indicator that discharges below these values have no risk of causing water quality problems. The EPA is also clear that a discharge above these trigger values is not an indicator that a water quality violation is occurring. Such a determination requires the full suite of studies, modeling and calculations normally associated with an individual permit. Even the recent court ruling that municipalities over benchmarks could be considered to be exceeding water quality values is based on discharges greatly over the benchmark values.

Here is an example of the problems this could cause. We have exceeded specific conductance on several occasions. Background material intrusion, such as blowing dust from surrounding areas can transport metals from the soil and cause an increase of specific conductance in our storm water. It would be difficult, if not impossible to determine the exact cause and mitigation method for such an exceedence. We would then be forced into repeated, costly and non-productive sampling for a situation over which we have no control. The use of adaptive management already outlined in the current permit is more than adequate to result in identification and resolution of these situations.

Boeing offers the suggestion that the Board consider the sampling program in the recently promulgated permit in Washington State. This sampling protocol was agreed to by all stakeholders as a means of collecting data that had scientific validity to the maximum extent possible for storm water. The data is consistent across permittees. Its seasonal characteristics allow analysis both by season and calendar year. Trend data can be developed helping shape future policy decisions. Permittees are certain as to their requirements for sampling and reporting. The Washington Department of Ecology (DOE) can use the data to target inspections and enforcement actions. Ultimately, the DOE is directed by Washington law (HB6415) to use this data to determine if numeric limits can be developed for storm water discharges.

Attachment 5:

Permit Costs and Environmental Benefits

Storm water permit fees are sometimes viewed as a pollution tax rather than covering the costs for reasonable inspections and technical assistance. This situation arises when permittees do not see any result from the fees they pay. By "result", the permittee is looking for technical assistance, inspections and improvement in water quality. Permittees become particularly disillusioned when they know their competitors are avoiding storm water costs because the responsible agencies do not seek out non-filers or conduct inspections on a routine basis. While few permittees welcome inspections, it does provide them an opportunity to talk to a professional who can advise them on the adequacy of their efforts (SWPPP and BMPs). Experience in other states has shown that over 50% of permittees do not have current storm water plans or do not implement them.

Boeing encourages the Board and supporting agencies to take an aggressive enforcement effort aimed at ensuring businesses covered by the existing permit are in compliance with the minimum permit requirements. This action should be taken prior to amending the existing permit with additional requirements. Proceeding to new and more burdensome requirements penalizes those who are attempting to comply. Those who are avoiding their obligations are no more likely to comply with the new permit than they did with the old one.

Recognizing that California currently has fiscal challenges it may be necessary to seek support from permittees to provide temporary funding to the board to implement a complete sweep of the state's covered industries. The board should at least reach out to the permittees to discuss ways to support improvements in education and enforcement.

Attachment 6:

Systems Approach.

The following data are from the SWRCB Report to the Legislature, Pursuant to AB982 (305b_surfacewaterass#131B76.doc) which catalogs the statewide water quality by type of water body, degree of impact, and constituent of concern. If we accept that most industrial storm water has metals as its major problem, and nutrients and pesticides are more of an urban problem, then we note that the vast majority of lake and river impacts are not associated with industrial stormwater discharges. We can also note that the CA SWRCB staff noted that the impacted numbers are high as the trend is to sample known problems and not those waterbodies minimally impacted.

Lake (acres)		
Impact	Major	Moderate
Metals	7156	5520
Nutrients	114300	79514
Pesticides	1871	85708
Total:	123327	170769
% Metal	**5.8%**	**3.2%**

River (miles)		
Impact	Major	Moderate
Metals	293	2281
Nutrients	1041	9815
Pesticides	563	2671
Total	1897	14767
% Metals	**15.4%**	**15.4%**

This California data demonstrates that industrial dischargers (both process and storm water) are the cause of less than 6% of major lake acreage impairment and less than 16% of major river mile impairment. It also shows that of those waterbodies moderately/slightly impaired the industrial dischargers are less than 4% for lakes and 16% for rivers. While, we would prefer that no waterbodies be adversely affected by industrial discharges, this does raise the question about where to put the limited resources available to the Board and to the citizens & businesses of the state. Is this an anomaly? For comparison, Washington State's 2002 document "Extinction is not an Option" addressing endangered salmon noted that less than 8% of the water quality problems were from toxic metals. The balance of the water quality

problems were from POTWs, urban stormwater and other non-point sources. A related statistic showed that most of the 303(d) listings in the state were related to dissolved oxygen, pathogens or TSS - none of which are common industrial discharges. These statistics are consistent across the nation - industrial storm water is a minor part of a much larger problem. This problem must be addressed through a systems approach to maximize results in attaining water quality.

The draft California Storm Water permit is typical of non-systems approach to the storm water problem. It attempts to impose ever more stringent requirements on the few areas, NPDES permittees, where permit requirements have resulted in improved water quality. The problem is that those gains were made on controllable processes water discharges at industries and POTWs – not non-point sources such as storm water. Further, the permit operates in isolation of the larger problem of urban storm water pollution from municipalities. Businesses may seem large until they are considered in the land mass of an urban environment. The storm water pollutant culprits are well known - automobiles, zinc coatings, oily substances, household products such as pesticides and so forth. California can take a lead on storm water by integrating the industrial and municipal permits to allow actions such as pollutant trading, joint BMPs, regional treatment systems and other innovative, forward looking actions. Improvement in the receiving waters is not going to result from the current "silo" approach to storm water. Boeing encourages the Board to open a dialogue with all the contributors to storm water pollution to find cost effective methods to restore California's waters to fishable and swimmable conditions.

Attachment 7: Additional Specific Comments

Natural Source in Background Concerns:
The reference to EPA Parameter Benchmark Levels in the proposed storm water General Permit, Section V PROVISIONS Number 7, does not consider the many natural sources of material that are exposed to storm water. Older more complex facilities may not be able to complete a certification that would state that there are no sources of pollutants at the facility. These locations may have galvanized roofs, storm water down spouts, and chain-link fencing materials that included zinc as a potential source. Aluminum is another widely used material that has a low benchmark limit.

These materials have been included in the new permit with low benchmark limits despite their common use and questionable impact on many receiving waters. The Santa Ana River and the LA River are the two major receiving waters in the southern California region and the volume of discharge from permitted industrial activities can only be a small percent of their total flow. Yet the storm water source area for these rivers includes multiple other potential non-regulated sources of metals like zinc and aluminum.

The regulated industry's concern is that although some individual facilities may record concentrations above various benchmark limits, the impact to the storm water system has not yet been determined as stated in the draft permit fact sheet.

Additional Inspections
The storm water pollution prevention plan (SWPPP) is the key component in ensuring that the suggested presumptive approach is successful. The presumptive approach allows those without professional staffs to quickly create a SWPPP and take actions recommended. They can then judge success and add BMPs from the list to create effective pollutant removal. The adaptive management approach enshrined in the SWPPP has allowed our engineering staff to implement measured, cost effective pollutant removal activities that we believe have substantially reduced our pollutant discharges. Our program of internal inspections and associated reports has been sufficient to ensure that potential problems are identified early so they can be resolved before any harm is done.

Performing pre-storm inspections and weekly inspections of equipment and all outdoor areas only distracts personnel from working on solutions to concerns identified in existing prescribed inspections. The need to hire an additional employee to perform the new inspection and recordkeeping tasks will have minimal incremental improvement on storm water quality - and will take precious resources away from other compliance activities.

Spill Response Procedures
This new permit's requirement for spill response is duplicative for the C-17 facilities and Boeing facilities in general. Nearly identical requirements are already specified by the Certified Unified Program Agencies, the Spill Prevention, Control and Countermeasure Regulations and as part of the Resource Conservation and Recovery Act.

Additional Analyses Based on SIC
It is not clear in the permit whether the requirement for additional analyses is based on a facility's primary SIC or if it includes secondary SIC as well. Benchmark values for some parameters could be exceeded by background levels.