SPECIAL HEARING
2/3/05
cc: BD, DI, DWQ
e-cys: BD, CC, HMS, TH, CMW

DEPARTMENT OF THE AIR FORCE
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Ms. Debbie Irvin, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor (95814)
P.O. Box 100
Sacramento, California 95812-0100

Subject: Comments on the Draft NPDES General Permit for Discharges of Storm Water Associated with Industrial Activities, Water Quality Order No. 05-XX-DWQ

Dear Ms. Irvin:

Our office appreciates the opportunity to provide comments regarding the draft NPDES General Permit for Discharges of Storm Water Associated with Industrial Activities, Water Quality Order No. 05-XX-DWQ (2004 Draft Permit). On behalf of the US Air Force installations in California (Air Force), I am forwarding our comments on the 2004 Draft Permit (enclosure). This enclosure addresses the proposed corrective actions in cases where USEPA benchmark values are exceeded, and offers our recommended alternative.

Should you have any questions regarding this matter, please feel free to contact Dr. Baha Zarah or Ms. Aubrey Baure of my staff at (415) 977-8888.

CLARE MENDELSOHN
Director

Enclosure: US Air Force Comments on Draft NPDES General Permit for Discharges of Storm Water Associated with Industrial Activities, Water Quality Order No. 05-XX-WQ

Enclosure: US Air Force Regional Environmental Office, Western Region
Comments on Draft SWRCB Water Quality Order No. 05-XX-DWQ

National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000001
Waste Discharge Requirements (WDRs) for
Discharges of Storm Water Associated with Industrial Activities
Excluding Construction Activities

Comments on Monitoring and Reporting Requirements (Section VIII):

The 2004 Draft Permit proposes new requirements triggered when analytical results from samples collected during a qualifying rain event exceed USEPA benchmark values: (1) Dischargers must collect and analyze samples from at least the next two consecutive qualifying events; and (2) Dischargers must continue sample collection and analysis until two consecutive sample results show no further exceedances of the USEPA benchmarks.

We recognize the need and importance of sample collection and analysis in characterizing storm water. Doing so will ensure that the most effective Best Management Practices (BMPs) are implemented, and in turn, ensure that storm water discharges do not cause or contribute to the exceedance of water quality standards in receiving waters. However, we do not believe that the new requirements will effectively improve the quality of storm water discharges from industrial facilities for the following reasons:

First, given the wide variability of storm water flows and the myriad of potential non-industrial sources (i.e., existing background levels, run-on from neighboring lands), these single-event exceedances are not representative of the discharger's storm water quality. A single sampling event, such as the 1st qualifying rain of the season, can easily trigger an exceedance of the benchmarks. But the cause of single-event exceedances is often unexplainable and may not even be seen in subsequent sampling events. Therefore, it would be unnecessary for a single-event exceedance to trigger the extensive new requirements. It is more reasonable to determine sampling requirements based on historical trends of storm water quality. Historical trends would reveal a clearer picture of what parameter is being exceeded, and can therefore be used to ensure the most appropriate BMP is implemented.

Second, the benefit of repetitive sampling is unclear. If there is a benchmark exceedance, the discharger would be required to collect and analyze a sample at the next qualifying rain event. If an exceedance is not found in this sample, the discharger would still then be required to collect and analyze a second sample. The basis for the requirement of two consecutive samples with no further exceedances is unknown, and an explanation is not included in the 2004 Draft Permit. Do two consecutive sampling events indicate a greater protection of state waters? If so, how? Without an explanation, it appears that these new requirements are more punitive than beneficial.

Finally, the new requirements will not direct the effective use of discharger's limited resources. Specifically, we expect compliance with the new requirements to divert resources from BMP

evaluation and implementation, as our storm water program managers will need to spend more of their time and resources collecting samples and analyzing storm water analytical data. We believe our storm water program must be dedicated and focused on the iterative approach of BMP evaluation and implementation.

As an alternative to the new requirements, we offer for your consideration the following sampling protocol. When a benchmark is exceeded for the 1st qualifying rain event of the season, the discharger shall implement corrective actions. Specifically, the discharger shall evaluate its facility to determine the source of the exceedance, and it shall modify existing BMPs or implement new ones. At this point, no additional testing of the parameter that exceeded the benchmark shall be conducted. However, if the same benchmark is exceeded for the 2nd qualifying rain event of the season, the discharger shall again implement corrective actions. Additionally, testing of the parameter that exceeded the benchmark shall be conducted for the next qualifying rain event, at those outfalls where the benchmark was exceeded. Under this alternative sampling protocol, the discharger will not be required to conduct sampling for more than three qualifying rain events in a season.

We believe that this alternative sampling protocol would effectively improve the quality of storm water discharges from industrial facilities for the following reasons: (1) It requires additional sample collection and analysis of the parameter that exceeded the benchmark, but eliminates any unnecessary sampling triggered by single-event exceedances; (2) It avoids any repetitive sampling; (3) By reducing the sampling burden, it allows dischargers to focus their limited resources on BMP evaluation and implementation. This focus will, in turn, ensure that water quality standards are met in receiving waters.