

M.T. Haro, Environmental Manager
Environmental, Safety & Health



LOCKHEED MARTIN



In reply, please refer to ENV/0105/19

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

SPECIAL HEARING

2/3/05

cc: BD, DI, DWQ

e-cys: BD, CC, HMS, TH, CMW

3 February 2005

SUBJECT: COMMENTS REGARDING THE REISSUANCE OF THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) GENERAL INDUSTRIAL STORMWATER PERMIT

Dear Ms. Irvin

Lockheed Martin Aeronautics Company (LM Aero - Palmdale) is a leader in environmental protection in the Aerospace industry and a strong supporter of all applicable environmental rules and regulations. However, LM Aero - Palmdale respectfully request that the SWRCB reconsider the promulgation of the draft June 2003 NPDES General Industrial Stormwater permit (draft permit). The draft permit provides minimal flexibility and places unnecessary burden on industry and facilities in the high desert.

LM Aero - Palmdale General Comments:

Our facility is located in the Antelope Valley of Los Angeles County and the area is considered a desert and arid climate. The closest water-body or "navigable" waterway to our facility is approximately 2 miles away. Due to our facility size, geographical location, hydrologic variability, and arid environment, certain conditions as presented in the draft permit would not apply to our facility nor would they be technically or economically feasible.

2. LM Aero - Palmdale already has a SWPPP in place that is reviewed and updated at least once a year and/or as any new operations come on-line that may pose a stormwater discharge issue.
3. LM Aero - Palmdale requires that all employees receive stormwater training and all Building Managers are required to undergo annual stormwater refresher training.
4. LM Aero - Palmdale has utilized the BMP-based approach and the current required inspection schedule and this has proven to be successful and continues to be the ideal system for our facilities. The added inspections would be of no

benefit, as the majority of operations at our facility are done under cover or in buildings. Our opinion is that the proposed draft permit complexity creates more confusion in regards to the need and frequency of sampling and inspection requirements.

- 5 The Clean Water Act does not list any discharge limits for stormwater effluent.
6. The proposed Parameter Benchmark Values does not account for natural pollutant background levels in different media (soil, air, water) and for various constituents (ie: zinc). Zinc is prevalent at various locations and is used in galvanized piping and zinc orthophosphate is used as a corrosion inhibitor for water distribution system piping.
- 7 Costs and manpower necessary to comply with these proposed permit changes far outweighs any water quality protection benefit.
- 8 SWRCB focus and resources would be better spent on enforcement actions for non-filers, as opposed to making sweeping changes to the current NPDES General Stormwater Permit.

LM Aero – Palmdale believes that implementing the proposed draft permit would be impractical, not truly representative, not technically feasible, or economically practicable at our facility. We respectfully request that the SWRCB reconsider the promulgation of this draft permit.

If you have any questions or need additional information, please contact Sean Van Gorder at (661) 572-7982.

Sincerely

Michael Iaro

MTH:smv