CAC
CALIFORNIA AIRPORTS COUNCIL

April 27, 2011

By Electronic Submission

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Comment Letter – Draft Industrial General Permit

Dear Ms. Townsend:

This comment letter is submitted by the California Airports Council (CAC), an organization representing California's commercial airports. California airports have been conducting stormwater monitoring multiple times a year, from multiple locations, for over fifteen years under the existing Industrial General Permit (IGP). Some of our member airports also comply with the existing IGP through an airport monitoring group (California Airports Monitoring Group), which is also submitting comments to the State Water Resources Control Board (SWRCB) separately.

Airports are considered industrial facilities (SIC code 45XX Sector S.) due to fueling and maintenance activities performed on site. The primary contaminants of concern for these activities are petroleum hydrocarbons, oil, and grease. Under the IGP we are also required to analyze stormwater runoff for BOD, COD, NH3, and pH in addition to metals and other general parameters.

The California Airports Council has the following specific comments:

1. The proposed changes to the IGP will move some airports into "Level II" compliance immediately because metals concentrations detected in runoff are above the proposed numeric effluent limits. However, the primary activities at airports which require monitoring are fueling, and maintenance, which do not generate metals contamination. We request that SWRCB consider the existence of background levels of metals and provide a mechanism for airports to monitor only the contaminants of concern.

2. The definition of "industrial activities" requiring coverage under this permit needs to be more clearly defined. This is particularly important if only those areas with such activities need to be monitored.

3. The proposed requirement to conduct real time field measurements, and the resulting significant increase in inspections, will likely require that airport staff perform

inspections and field monitoring because consultant support of such extensive work would be cost prohibitive. This requirement will place additional and unwelcome burdens on California airports at a time when they are struggling with reduced passenger and operations levels and concomitant reductions in revenues. The additional requirements presented in the proposed IGP will place a significant financial burden on already strained airport resources.

4. Although most airports are open 24 hours a day, 7 days a week, the airport personnel who would conduct the proposed inspections and field monitoring are generally only available Monday through Friday, during normal business hours. CAC requests that required inspections and field monitoring be limited to this period. In addition, CAC requests that some inspections be permitted on a visual basis only, without a related documentation requirement. For example the requirement to "inspect and clean outdoor areas and equipment that may come into contact with industrial materials or wastes" can and should be permitted on a visual basis only.

5. The preponderance of California's commercial airports has been and continues to be in compliance with applicable storm water regulations. With such a strong record of compliance, it is unclear why SWRCB proposes to require more, and more stringent, monitoring. CAC asks that SWRCB clearly identify what additional benefit may be gained by the proposed expansion of current inspection and monitoring protocols and that these benefits be substantial enough to warrant the significant additional costs that will be incurred by airports in implementing them.

6. We applaud the proposed use of the State "SMART" database and request that it be given functionality that would allow airports to share data and provide for both data trending and manipulation capabilities to help identify specific runoff characteristics unique to airports as well as background components which may be associated with non-airport activity in the region.

7. Numeric action levels (NALs) should be based on currently available technology until the unique discharges of airports and the background concentrations have been determined. The NALs should be based on sector-specific data (which already exists for the airports) and should be collected over an initial two year period of the permit cycle.

8. Airport operations are not conducive to surface structural BMPs. Some subsurface structural BMPs, such as routing runoff through vaults with filtration media, are very expensive to install and maintain. It is important to note that certain structural BMPs have not been shown to reduce concentrations of various parameters in stormwater. The CAC requests that the SWRCB evaluate these BMPs prior to requiring their implementation to ensure that the costs of such measures would, in fact, produce a commensurate benefit.

9. Group monitoring has been an efficient and cost-effective means of compliance for many airports. Under the proposed IGP, group monitoring will no longer be available. CAC requests that the group monitoring option continue to be permitted.

10. Requiring airports to have a Qualified SWPPP Developer (QSD) sign each amendment or revision to the SWPPP (V1I.B.2.a, page 16) would create an unnecessary financial and

administrative burden for minor changes to the SWPPP. CAC recommends that only major amendments be signed by the QSD.

California airports share the SWRCB's commitment to ensuring the quality of California's water resources. We do ask that SWRCB focus its efforts on those initiatives that will result in clear and measurable improvements in water quality and that do not pose undue burdens on those responsible for implementing them.

In closing, we appreciate the opportunity to provide these comments and look forward to working with the SWRCB as it continues to develop the proposed Industrial General Permit.

Sincerely,

Alan L. Murphy
President
California Airports Council