

## Work Schedule Revision Proposal

Final JBLM MS4 Storm Water Permit 22 August 2013

Request modifications of key dates in the schedule of activities included in pages 29-31 of the recently signed EPA Final MS4 Permit. The date of EPA permit signature was 22 August 2013.

The reason for the requested modifications is to allow adequate time to obtain financial and staff resources, and to accomplish mandated work specified in the new permit, received by JBLM on 26 August 2013.

EPA approval of the permit allows the Army to classify requests for funds as "Class I" funds requirements, which allows for possible insertion of requirements over similar other Class I requirements as well as over all Class II and III requirements. Financial support for the storm water management program will be inserted in the FY 14 budget year. We are requesting funding for additional staff and for specific projects required to implement the permit.

1. The key project requirement is preparation of an MS4 Storm Water Management Plan (SWMP) (II.A.3 and IV.C.2). When the plan is submitted to EPA it should have most of the important plan components already constructed and included. The due date for SWMP documents given in the permit is one year from permit effective date.

Financial and staff resources are currently insufficient to do the required work. The plan is to request project money in the FY 14 budget cycle, with the intent of receiving funding early in the fiscal year. As funds are being obtained, existing staff will develop the best possible performance work statement, to be used in obtaining a consultant contractor to prepare the JBLM SWMP. The contracting time required to hire a consultant is dictated by law and may take up to 270 days. The performance period of the contract will be six-nine months beyond the completion of the contracting period.

JBLM requests to change the due date for the SWMP from one year from the permit effective date to 30 months from the permit effective date as a result of the fiscal and contracting processes discussed in previous paragraphs.

2. The requirement to make the SWMP available to the public via a website (II.B.2.c) has a suspense date of one year from the permit effective date. The proposed suspense date for the SWMP in paragraph one above is 30 months from the permit effective date. The suspense date for making the SWMP available to the public via a website should be the same 30 months. Request that the suspense date be changed from one year from the permit effective date to 30 months from the permit effective date.

3. The requirement to train responsible staff shows up in at least four locations in the permit (II.B.3.g, II.B.4.h, II.B.5.k, II.B.6.g), with suspense dates that vary between one-two years from permit effective date to "on-going." The staff on hand that is working storm water issues is fully trained in the subject matter. No specific additional course work is stipulated in the permit. When new staff is hired, the individuals should already possess education, experience or other knowledge, skills and abilities that will allow competent performance as a member of the JBLM

storm water team. The new individuals will receive local storm water facility training from the respective supervisor. Request that the suspense dates for the multiple-stated requirements to train responsible staff be revised to state “orientation and training concerning the JBLM storm water management program will be accomplished within the first six months of employment for new staff who work directly on storm water management issues.”

4. The requirement to develop a construction site inspection plan and to inspect prioritized sites at least quarterly (II.B.4.g) has a suspense date of six months from permit effective date. As previously explained, funding for additional staff is being requested in the FY 14 budget cycle. After funds are received, the hiring process will begin. Considerable additional time is required to bring additional staff on board. Request the suspense date be changed from six months from permit effective date to 24 months from permit effective date.

5. The requirement to develop a site inspection program to verify proper installation of permanent SW facilities (II.B.5.i) has a suspense of 14 months from permit effective date. Accomplishment of this function is dependent upon hiring of additional staff as previously explained. It is highly improbable that additional staff will be available and fully trained within 14 months of the permit effective date. Request that the suspense date be changed from 14 months from permit effective date to 24 months from permit effective date.

6. The requirement to begin storm water sampling of storm water discharges to American Lake, the JBLM Canal and Clover and Murray Creeks (IV.a.5, IV.A.6.a, IV.A.6.b, IV.C.1) has suspense dates that vary from one year from permit effective date to 18 months from permit effective date. The funding to support the sampling and analysis program is projected to come from the FY 14 budget cycle, and funding is uncertain to date for this part of the program. Also, all aspects of the sampling program should be developed and implemented simultaneously to ensure best possible outcomes and minimize up-front confusion. A uniform suspense date for all sampling and analysis required will allow for an orderly process of assembling the monetary and staff resources to do the work. Request the suspense date for beginning water sampling in the JBLM canal (IV.A.6.a) and Clover and Murray Creeks (IV.A.6.b) be changed from one year from permit effective date to 18 months from permit effective date.