

FW: Ft Lewis permit
Beale, Harriet (ECY)
to:
Misha Vakoc, John Palmer
06/30/2010 12:56 PM
Cc:
"Moore, Bill (ECY)"
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Misha and John,
Thanks for making the trip down to Lacey for our meeting yesterday. Ed reviewed Option A of the preliminary draft and gave me the comments below.

Regards,

Harriet

From: O'Brien, Ed (ECY)
Sent: Wednesday, June 30, 2010 12:01 PM
To: Beale, Harriet (ECY)
Subject: Ft Lewis permit

Harriet,

Here are comments on the draft permit.

- 1) Section 5a: For compliance with the hydrologic performance requirement, after the reference to the Western Wash. Hydrology Model, I would suggest adding "or other continuous runoff model approved for use by the Washington Department of Ecology."
- 2) Section 5.a.i and ii. These are the two performance targets we are seriously considering, so the text is fine. However, at the moment, the approved continuous runoff models have not been programmed to give the user an easy way to determine compliance. Until they are reprogrammed, we would have to give the permittee instructions re how to use the existing runoff models to demonstrate compliance. We have not written up that guidance, but can probably do so if USEPA proceeds with one or both of these standards.
- 3) Section 5d. The text says that the permittee must meet the targets in the table. The implication is that those exact numbers have to be achieved. That is probably not the intent. You might want to say meet or exceed the NVA percentages; do not exceed the Impervious surface percentages. Also, I would note this is a very prescriptive requirement, especially the impervious area limits. Consider whether it is appropriate

and necessary for USEPA to restrict options for meeting CWA goals. Also, you might think about whether these limits should apply to redevelopment sites.

4) Section 5h. The text is a repeat of the text in section 5c. We suggest replacing it with the text for Minimum Requirement #10 in the '05 manual.

5) Section 5.i. This is a fine requirement. However it is written within the context of a section detailing requirements for new development and redevelopment. Did you intend this statement to apply to all (existing and future) storm water facilities on the base, not just those built for new and redevelopment that occur after the permit issuance?

]Ed