



**Comments on preliminary draft FACT SHEET for NPDES Permit #
WAS-026638 Joint Base Lewis-McChord MS4. (UNCLASSIFIED)**

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10/13/2011 12:49 PM

Cc: "Smith, Jennifer M Mrs CTR US USA IMCOM", "Crawford, Philip B
CIV USA IMCOM", "Gibbens, Joseph Mr CIV USA IMCOM"

History: This message has been replied to and forwarded .

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Ms. Misha Vakoc:

Please see the attached comments on the preliminary draft FACT SHEET for NPDES Permit # WAS-026638 Joint Base Lewis-McChord MS4. I am providing pages from the JBLM Integrated Contingency Plan discussing the Spill Response program on JBLM. As stated in the comments, this document should be submitted to EPA in the near future. I also used some information from the JBLM Guidebook and Phone book. Please let me know if you need the phonebook.

I am also attaching a draft of the Annual Surface water sampling in Clover Creek and Morey Creek on McChord Field completed in August 2011. (Note this is Morey Creek, not Murray Creek). I plan to forward a record copy with the MSGP DMR.

V/R

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- Pages from Final JBLM ICP.pdf



- EPASUBMITTALFact Sheet Comments MS4 permit

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- ANNUALCREEKSAMPLEMCCHORDFIELD.pdf



- smime.p7s

Comments on preliminary draft FACT SHEET for NPDES Permit # WAS-026638 Joint Base Lewis-McChord MS4. Submitted by Martin Burris, Directorate of Public Works Environmental Division, Joint Base Lewis-McChord, WA.

Comments have been numbered for reference. Notations in *italic* font are for clarification only.

1: This is a general comment that should also apply to the permit language:

Airfields, including ramps, approaches and runways should be exempted from Low Impact Design (LID) stormwater requirements. Special stormwater management requirements for airfields are consistent with Washington Department of Ecology, Washington State Department of Transportation, and DoD guidance. Please see Washington State Department of Transportation Aviation Stormwater Design Manual: Managing Wildlife Hazards Near Airports, dated December 2008. There are significant restrictions on land use in and around airfields. Impounded water in above ground LID structures would attract birds and create a hazard for both the aircraft and wildlife.

2: Page 1 Paragraph 1. A hyphen should be used between Lewis and McChord in the installation name, Joint Base Lewis-McChord.

3: Page 5 Paragraph 3: The phone listed is for number for Mr. Joe Gibbens. He is no longer the technical contact for this permit. Including a phone number in the fact sheet encourages the public to use this as a contact number. If not required please remove the phone number. As stated in the Fact Sheet, questions and comments should be directed to the EPA. If a phone number is required, the JBLM Public Affairs Office number (253) 477-0164 in the fact sheet. For the permit itself, please use the DPW main office number (253) 967-3191. On JBLM the term “stormwater” as one word if preferred over “storm water”.

4: Page 5 Paragraph 4 and 5: replace entire paragraph 4 with: In accordance with recommendations of the 2005 Base Closure and Realignment Commission, Joint Base Lewis-McChord was established in 2010. Joint Base Lewis-McChord includes the military installation located in Pierce and Thurston Counties in Washington, a subinstallation; Yakima Training Center (YTC), and other geographically separate facilities. For the purpose of this permit, JBLM shall not include the YTC or geographically separate facilities. JBLM consists of approximately 86,176 acres comprising Fort Lewis Army Base (Fort Lewis) and 4,639 acres comprising McChord Air Force Base (McChord AFB). JBLM includes a land area of approximately 142 square miles (*JBLM 2011 guidebook*) The primary Army military mission on JBLM is to train, mobilize and deploy U.S. Army forces. The primary Air Force mission on JBLM is to develop and sustain expeditionary Airmen to deliver global airlift for America. (*see page 18 JBLM guidebook*) Actions which predate JBLM may be described as either a Fort Lewis or McChord AFB action depending of the responsible organization at the time of the action.

Page 5 Paragraph 5: delete first sentence referring to BRAC. See first sentence in paragraph 4. (*note BRAC is Defense Base Closure and Realignment Commission (per BRAC website). The discussion of responsibilities is not quite correct This replacement wording for paragraph 5*

might improve the tasking discussion: New paragraph 5: The Joint Base Garrison operates the installation on behalf of warfighting units, families, and extended military community who rely on JBLM for support. With an Army joint base commander and Air Force deputy joint base commander, the garrison supports the installation through directorates and agencies that provide a full range of city services and quality-of-life functions— everything from facility maintenance, recreation, and family programs to training support and emergency services. *Although the ARMY is the lead agency, JBLM is cooperatively operated by both the Army and Air Force. (text from page 6 of the JBLM Guide)*

5: Page 6. Paragraph 4: This section could be confusing for readers. Replace Fort Lewis and McChord AFB with JBLM. *Any current and future references to the installation should be JBLM. Fort Lewis and McChord AFB should only be associated with past actions. Fort Lewis and McChord AFB ceased to exist when JBLM was established. It is a challenge for the local community and JBLM personnel to incorporate the new installation designation.*

6: Page 8 Paragraph 1 first line: JBLM reports that development within the training areas and firing ranges is restricted. Second sentence replace with some training areas were not included in the initial MS4 inventory on JBLM. The third sentence is confusing. *I believe the intent is to include existing MS4 systems (if any) and future MS4 systems within training areas in the permit and SWMP. These areas would be covered by the permit and no future application would be required. If the development does not include MS4 infrastructure, there would be no basis to restrict development in training areas under the MS4 permit. A base-wide SWMP should only place conditions on development when the development includes MS4 infrastructure.*

The third paragraph is a little confusing. I believe there are two issues here. One issue is to expand the MS4 requirements to areas with MS4 outside the Seattle Urbanized Area on JBLM. Any MS4 operated by JBLM on JBLM would fall under the permit. (note nearby property owners and jurisdictions including Pierce County, WSDOT, BNSF, Lakewood, and Parkland may have MS4 infrastructure on JBLM which is not managed by JBLM and is not owned by JBLM and does not convey stormwater which is generated on JBLM. The MS4 infrastructure owned/operated by others would not be part of the JBLM MS4) The second issue is the discussion of a Base-wide MS4 which gives the impression that MS4 requirements will be imposed in areas where there is no MS4 infrastructure conveying stormwater to waters of the U.S. As stated in the permit response, implementing MS4 requirements in areas with no MS4 facilities should be a recommendation, not a permit requirement. Recommend the two issues described be presented separately.

7: Page 8 paragraph 4: The JBLM 2010 population is estimated at 95,000 including military personnel, military dependants residing on base, civilian employees, and visitors. (Based on current Comprehensive Water System Plans for JBLM). Most development on the installation is within areas designated as cantonment areas. These areas support the installation operations including support for those living and working on the installation. Areas designated as training areas have limited development and are reserved to training operations.

Cantonment area (The term cantonment area now includes McChord Field). It was hard to track what areas drain to what watersheds. The replacement bullets are suggested below to replace the page 8 sections and the first paragraph on page 9:

*---Cantonment areas designated as JBLM-North and JBLM-Main. Approximately 10,603 acres comprise the JBLM-Main and JBLM-North cantonment with 4,972 acres draining to MS4 infrastructure. The MS4 on JBLM-Main drains to Murray Creek, American Lake, and wetland areas west of Interstate Five. These wetlands overflow to the JBLM stormwater canal. The MS4 system within JBLM-North drains to a stormwater canal which discharges to Puget Sound and to American Lake. MS4 infrastructure includes drainage systems, curbs and gutters, ditches and storm drains, lift stations, treatment systems, outfalls and other infrastructure to convey stormwater.

*---Cantonment areas on McChord Field. A central MS4 conveys stormwater from approximately 415 acres to Clover Creek. Clover Creek flows west and north from McChord Field to Lake Steilacoom. The central areas include the airfield and supporting infrastructure as well as some smaller residential areas. The extent of the MS4 serving the McChord Field separate residential area drains approximately 320 acres to Carter lake and Emerson and other wetlands. MS4 infrastructure includes drainage systems, curbs and gutters, ditches and storm drains, lift stations, treatment systems, outfalls and other infrastructure to convey stormwater. (*note these are total drainage areas, not areas of impervious surfaces, areas with MSGP dedicated outfalls 9, 17, 36 were not included in the area totals. For clarification, the drainage map provided to EPA did not split the housing drainage up. Part of the area drains to Carter Lake with an overflow line to Emerson wetland.*)

*---Training areas on JBLM. Designated areas of minimal development to support field training. These areas are typically not served by the JBLM MS4 and stormwater infiltrates or follows natural drainages. McChord Field includes some training areas outside the existing MS4. Most training area on JBLM were formerly part of Fort Lewis. Most areas outside the cantonment areas are designated as training areas. In most cases these areas are not served by the JBLM MS4. JBLM Training areas include approximately 75,573 acres within the former Fort Lewis Boundary and training ranges on McChord AFB. Training areas may be near cantonment areas and drain to the water bodies described in the discussion above. Training areas may drain to Muck Creek, the Nisqually River, and Puget Sound. (*An evaluation of outfalls on Muck Creek has not been completed. Please remove discussion of “unknown outfalls”*)

7A: Page 9 paragraph 1 *Sequalitchew Creek is not a receiving water for MS4 on JBLM.*

8: Page 10 bullet/paragraph 1: *Not clear which BNSF (no longer Burlington Northern) railroad tracks they are describing. There are multiple lines on and around JBLM. Spurs to logistics area and an existing line through McChord field and JBLM main.*

“The Murray/Sequalitchew Watershed includes Murray Creek, American Lake, Sequalitchew Lake and Sequalitchew Creek; all are entirely or partially located

within the boundaries of JBLM. The Murray Creek Subbasin is bounded on the west by Puget Sound; the northern boundary runs through JBLM North and the City of Lakewood, and includes Gravelly Lake; the eastern boundary runs through JBLM McChord, and along the **Burlington Northern Santa Fe Railway** tracks. The southern boundary includes the southern portion of JBLM encompassing Gray Army Airfield”

Page 10 Bullet/paragraph 3: Clover Creek does not drain to Puget Sound at the JBLM Boundary. Clover Creek (Chambers/Clover Creek water shed) drains to Lake Steilacoom. This section should be clear. Suggest another bullet section for Chambers/Clover Creek Water shed.

9: Page 10 table 1: Recommend a qualifier be placed below the table: Some uses identified may be prohibited or limited on the reaches within JBLM. Boating and contact recreation in Muck Creek and Clover Creek are restricted uses on JBLM. Stock watering, harvesting, commerce and navigation activities are limited JBLM.

10: Page 14 Paragraph 4 Need to clarify the drainages: It may not be correct to identify American Lake as a tributary of Clover Creek. American Lake and Clover creek are assigned to separate sub-basins in the *Chambers/Clover Creek Management Plan* Clover Creek flows to Lake Steilacoom.

11: Under Other Considerations page 15:

I am not sure where this could be sited. (Possibly under other considerations) JBLM emergency response procedures reduce the potential for a significant spill of contaminants to navigable waters of the U.S. JBLM has emergency facilities which are manned on 24 hour basis including dispatch centers, onsite fire stations, towers, and command centers. JBLM first responders are trained and equipped to respond to hazardous material spills.

JBLM has significant emergency response capabilities and is required by regulation to develop and implement emergency response procedures. Two major emergency response documents are the Integrated Contingency Plan and the Spill Prevention Countermeasure and Control Plan. An excerpt from the Draft JBLM ICP is attached with spill response procedures for all personnel on JBLM. JBLM Incident Commanders and first responders are familiar with spill response requirements. Spill responses will be completed in accordance with Federal Emergency response procedures established by the Department of Homeland Security. Please see page EAP-1 in the ICP. The ICP and SPCC include spill response procedures and inventories of resources that may be deployed to address spill events.

JBLM maintains operational standards for properties and facilities within the installation. JBLM established policies and standards that are implemented installation wide. The policies apply to most JBLM organizations as well as tenants, businesses and guests. Standards for the management of Hazardous Materials and Hazardous Waste, minimize the risk that these materials will contaminate stormwater. The Integrated Contingency Plan ensures that

appropriately equipped and trained first responders will respond to spill events. Hazardous materials are strictly managed through the JBLM hazardous material review process and central Hazardous Material Control Center. An online database of Material Data Safety Sheets is available to all qualified hazardous material users. *(Immediate Spill procedures and other information from draft ICP and SPCC attached. The complete documents are scheduled to be officially transmitted to EPA in accordance with regulatory requirements. Requestors should be directed to the appropriate EPA program managers for additional information on these documents)*

12: Page 17 Section C. paragraph 3: This is a question rather than a comment. For the paragraph below is a specific type of written agreement required of is that a permittee decision? *JBLM has numerous organizations and agencies which are tenants on JBLM. In some cases these tenants operate the MS4 serving their respective facilities. Is including stormwater requirement in the real property agreement (lease) adequate for the transfer described below. It will take time to modify real property agreements. There are a number of different types of agreements for organizations on JBLM.*

EPA regulations allow that one or more of the required SWMP components may be implemented by an entity other than the permittee (for example, an organization which is not a regulated MS4 may implement a street sweeping program for a permittee). See 40 CFR § 122.35(a). Pursuant to 40 CFR § 122.35(a), Part II.A.6 of the permit allows JBLM to delegate the responsibility of implementing some or all of a required minimum control measure to another entity if: 1) the other entity in fact implements the control measure; 2) the particular control measure is at least as stringent as the corresponding permit requirement; and 3) the other entity agrees to implement the control measure on the permittee's behalf. The permittee must enter into binding agreements with such outside parties in order to minimize any uncertainty about compliance with the permit. JBLM remains responsible for compliance with the permit obligations in the event the other entity fails to implement the control measure (or any component thereof).

13: Page 20 Paragraph 7: In addition, EPA has proposed that JBLM provide access to the SWMP document and Annual Reports available to the public through posting the materials on a website, and to provide at least one volunteer activity per year to engage the JBLM public in SWMP implementation. EPA encourages JBLM to work cooperatively with neighboring MS4 operators or other organizations, to coordinate efforts that can engage the military community in the discussion of effective storm water management within JBLM.

There are issues with posting the subject materials to a public website. There is a significant review process to approve posting to a website. This would include a security review. The annual report is a very technical document. This is not suitable for a public audience. Requests for these records will be processed through FOIA. Public releases of information should be incorporated into the public outreach strategy. The permit language includes a significant number of self-audit requirements for the permittee. The EPA audit policy allows the

organization to limit the reporting of issues found during the self audit. Public release of all findings would inhibit the self audit process. Many of the minor corrective actions listed in the permit are similar to the findings described in the EPA audit policy. JBLM conducts routine environmental inspections in accordance with the EPA Audit Policy.

14: Page 28 last paragraph: beginning with To comply with part II.B.5.d. *The text in the fact sheet 65% native does not match the native area and impervious surface areas in the permit.*

15: Page 35 paragraph 5: The term “The city” is used. Should this be permittee or JBLM?

Attachment JBLM ICP pages.