



DEPARTMENT OF PUBLIC WORKS  
**COUNTY OF HUMBOLDT**

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AREA CODE 707/FAX 445-7409

ARCATA-EUREKA AIRPORT TERMINAL  
McKINLEYVILLE

AVIATION 839-5401

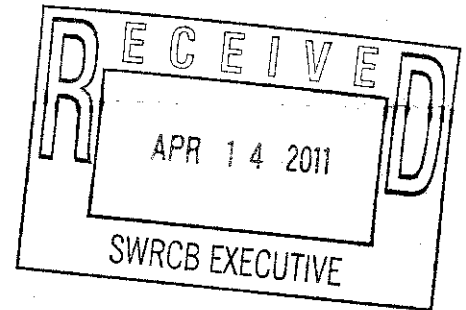
PUBLIC WORKS BUILDING  
SECOND & L ST., EUREKA

ADMINISTRATION	445-7491	NATURAL RESOURCES	445-7741
BUSINESS	445-7652	PARKS	445-7651
ENGINEERING	445-7377	ROADS & EQUIPMENT MAINT.	445-7421
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CLARK COMPLEX  
HARRIS & H ST., EUREKA  
LAND USE 445-7205

April 4, 2011

State Water Quality Control Board  
Charles R. Hoppin, Chairman  
PO Box 100  
Sacramento, CA 95812-0100  
commentletters@waterboards.ca.gov



**RE: Comment Letter –Draft Industrial General Permit.**

Dear Mr. Hoppin:

As the Humboldt County Public Works Division of Aviation manager, I'm writing on behalf of two of the County's six airports – Murray Field Airport and Arcata Eureka Airport and as a member of the American Association of Airport Executive's 70 Airport California Monitoring Group.

I am submitting the following comments on the draft Industrial General Permit in support of:

- Continuing the group industrial permit
- Reviewing and refining the number of required inspections and sampling recommended by the Board's staff along with a full explanation of the merits of the increased inspections/sampling.
- Staff providing a clear definition of "operating hours".

**GROUP MONITORING PERMIT:**

The county participates in the Airport California Monitoring Group (ACMG). A Group started in 1992 by the American Association of Airport Executives.

Since 1992 ACMG has been an active and engaged monitoring group. The Group's compliance record is consistently impressive. Federal, state and local inspectors often leave group member airports with compliments and encouragement, rather than compliance concerns.

In addition to the Group's focus on shared knowledge, training, and compliance programs, ACMG has also been an active participant in the State's evolving stormwater permitting program. The Group has submitted written comments or provided oral testimony regarding every industrial permit development since the SWRCB announced its first permit in the early 1990s. Participation includes testimony and comments to the SWRCB's Blue Ribbon Panel and on each of the State's request for comments on various proposed versions of a new industrial general permit. Similarly, the ACMG will file comprehensive comments on the draft permit by the April deadline.

I believe strongly that the Airport California Monitoring Group has been providing significant benefits to all of the participating airports that would be impossible but for the "group monitoring" provisions in the current industrial stormwater general permit. In addition, many of those benefits also translate into benefits to the SWRCB and Regional Boards by our ongoing participation in the State's evolving permit development processes; shared exchange of information that both improves the Group's compliance strategies and the State's understanding regarding airport stormwater discharges; and through real environmental protection resulting **NOT** from collecting samples, but from implementing appropriate Best Management Practices (BMPs) and conducting visual inspections that help to improve the performance of those BMPs.

We have learned much individually and collectively and I would like to convey the benefits of teamwork and participating in a Monitoring Group that provides both technical and –equally important– regulatory assistance.

We all, as stakeholders, benefit greatly from participating in a Monitoring Group and we encourage the SWRCB to work with the many existing groups to fit these benefits into the final permit.

#### **INSPECTIONS AND SAMPLING REQUIREMENTS:**

Airports – even the smallest general aviation airports – are complex entities. Not many of the facilities subject to the State's Industrial Stormwater General Permit have "tenants" that come onto their property, generate stormwater discharges "associated with industrial activities" and then expect the landlord to accept all of the liabilities and responsibilities for pollutant discharges. But that, in a nutshell, is what airports must face under the State's existing and proposed permitting scheme.

Fortunately, however, airports maintain some power through their lease agreements with these tenants that allow airport managers, like me, to require that those tenants implement BMPs and conduct their business in a way that allows the airport to limit pollutants in stormwater discharges. In addition, the Airport California Monitoring Group has technical experts to assist with BMP selection and implementation, AND legal/regulatory assistance to help guide airports in working through their lease agreements and other potential obstacles that might otherwise inhibit environmental protections.

In addition to having to oversee and shepherd tenants on stormwater compliance matters, I also have other responsibilities at our two airports. I am responsible for the well being of the County airports including environmental compliance, safety, security, emergency response, maintenance, planning, construction, public relations and leases for 200 tenants along with management and training of a very lean staff of 19 dedicated airport employees.

Please recognize that I must perform these tasks – like many of my counterparts throughout the Airport California Monitoring Group – at more than one airport...so multiply by 2 the inspections and sampling subject to this draft permit. Currently, I have a system in which we can ensure that appropriate inspections are performed and samples are collected at the two airports. However, the new draft permit, by some estimates, increases monitoring and inspection mandates **some 3500%** – as many as **440 inspections** could be required annually at each airport. Compliance under the new permit would require a significant investment in new staff merely to do the estimated **880 inspections** annually for Humboldt's two airports.

And while the Airport California Monitoring Group has always supported the benefits of the existing permit's reliance on visual monitoring and inspections, we also believe that the current permit is providing significant benefits. We do not believe, however, that because the current scheme provides benefits, 350+ inspections will provide ANY additional benefits.

**I would be interested in obtaining from SWRCB staff any analysis that predicts the level of benefits associated with such an extreme expansion of the current inspection and monitoring scheme.**

**OPERATING HOURS:**

Further, I ask that you also recognize that while "the airport" may be "open" 24/7, Staff operating hours are much less and may vary depending upon different factors. Therefore, any final permit must better define the "operating hours" or the State's expectations for collecting any samples because the County likely cannot hire staff to ensure that someone is on site 24/7 for compliance requirements. Rest assured, our BMPs and procedures are working 24/7, the airports are open 24/7 but we do not believe that we need personnel at the airports to be available to be inspecting them or collecting samples 24/7.

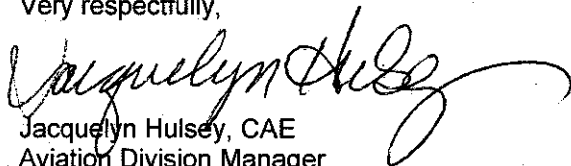
Finally, let me close by reiterating that I believe that the **BMP-based approach** to stormwater general permitting **is the best if not only feasible approach at this time.**

While I'm still learning about all of the State's Clean Water Act programs, the Total Maximum Daily Load (TMDL) and Anti-Degradation programs are effective and logical methods for protecting local water quality. Simply requiring those who obtain stormwater general permits to ensure compliance with these other programs addresses your local water quality concerns without unduly burdening the permit development and implementation process.

The ACMG Group Leader, Jeffrey Longworth, has worked with state permitting authorities across the country and with EPA headquarters in Washington, DC on these issues and is available to your staff if they wish to discuss these issues further.

In any event, thank you for extending the comment period, listening to us at the recent meeting in Sacramento and, again, the ACMG will be submitting written comments in April.

Very respectfully,



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