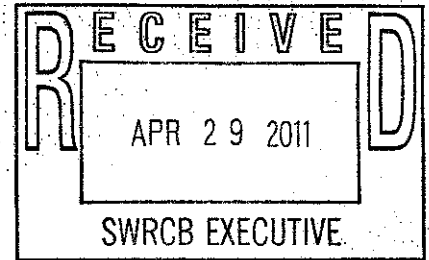




# Los Angeles World Airports

Public Comment  
Draft IGP  
Deadline: 4/29/11 by 12 noon

April 29, 2011



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

Re: **Los Angeles World Airports Comments on Draft Industrial General Permit**

LAX

LA/Ontario

Van Nuys

City of Los Angeles

Antonio R. Villaraigosa  
Mayor

Board of Airport  
Commissioners

Michael A. Lawson  
President

Valeria C. Velasco  
Vice President

Joseph A. Aredas  
Robert D. Boyer  
Boyd Hight  
Fernando M. Torres-Gil  
Walter Zifkin

Gina Marie Lindsey  
Executive Director

Dear Ms. Townsend:

The Los Angeles World Airports (LAWA) appreciates the opportunity to comment on the proposed draft Industrial General Permit. Each of the three airports operated by LAWA, Los Angeles International Airport (LAX), Ontario International Airport (ONT) and Van Nuys Airport (VNY), filed a *Notice of Intent* for coverage under the State's General Industrial Permit. Tenant activities, such as aircraft maintenance and fueling are common for all airports. LAX and ONT include car rental and concessions. Most of the tenants at each airport are co-permittees with LAWA under the same industrial general permit.

Comments are divided into two categories, General and Specific:

1) General Comments

- a) The proposed changes in additional monitoring (e.g. observations, inspections and sampling) significantly increase workload and hence financial burden on both LAWA and its tenants. With reduced revenues and a historic budget shortfall, the City of Los Angeles imposed hiring restrictions since summer 2010. It will be challenging to meet all of the monitoring requirements mandated by the proposed Industrial General Permit draft.
- b) Based on previously submitted storm water analyses, elevated metal concentrations may put LAX into the "Level II" Corrective Action category immediately. Similar to other airports, storm water pollutants originating offsite LAX contribute to the runoff profile of both the Argo and Dominguez drainage basins. LAWA proposes that the State Water Resources Control Board (SWRCB) establish a separate set of numeric action levels and effluent limits for airport facilities. It is cost prohibitive and impractical for LAWA to implement extensive treatment Best Management Practices (BMP) onsite due to physical and operational limitations.
- c) LAWA strongly supports the continued application of established and proven BMPs to achieve pollution prevention outcomes. Based on LAWA's experience, these are the most cost-effective measures that can be put in place to help improve water quality.
- d) LAWA welcomes the formal adoption of the "SMART" database and reporting system.



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2) Specific Comments

- a) QSD/QSP and SWPPP certification requirements (draft order, pages 11 and 16) will create undue administrative and financial burdens especially for minor changes of the SWPPP.
- b) Excessive numeric action limits or numeric effluent limits (draft order, pages 14-15) will lead to non-compliance for a large number of airport facilities. They should be industry specific, i.e. based on the profile of discharges for airport facilities.
- c) Inspection requirements (pages 23, 25, 26, 30), including pre-storm inspections, pollutant source inspections, and weekly inspections of all outdoor areas associated with industrial activity, are excessive and will strain already limited resources.
- d) Sampling collection/analysis requirements (page 31) are unrealistic because of the climate in Southern California. Generally, there is little or no rainfall to meet the 1/4" threshold during the 2<sup>nd</sup> and 3<sup>rd</sup> quarters.

Thank you again for the opportunity to comment on this Draft Permit. LAWA and its tenants are committed to improving water quality and continued cooperation with the SWRCB in compliance with its Industrial General Permits. For any questions, please contact Karin Christie of my staff at (424) 646-6480.

Sincerely,



Robert Freeman  
Airport Environmental Manager II

RF:KC:mw

cc: M. Feldman  
M. Molina  
D. Shuter  
R. Ilgunas  
R. Morones  
M. Adams  
C. Guidry  
J. Smith