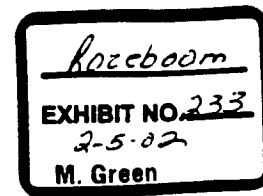


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April 30, 2001

Washington State Department of Ecology  
Water Quality Program  
3190 - 160<sup>th</sup> Avenue Southeast  
Bellevue, Washington 98008-5452  
ATTN: Kevin Fitzpatrick

Washington State Department of Ecology  
Shorelands and Environmental Assistance Program  
3190 - 160<sup>th</sup> Avenue Southeast  
Bellevue, Washington 98008-5452  
ATTN: Ann Kenny

**Subject: Comments on NPDES permit modification for Seattle-Tacoma International Airport**

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Northwest Hydraulic Consultants has been retained on behalf of the Airport Communities Coalition (ACC) to provide technical reviews of stormwater, hydrology, and hydraulics elements of proposed development actions at SeaTac airport. The purpose of this letter is to provide additional comments on behalf of the ACC for the proposed modification to NPDES Permit No. WA-002465-1 for the Port of Seattle, Sea-Tac International Airport. The proposed modifications are those discussed by Ecology at a public hearing on February 12, 2001.

We have two comments. Both involve a need for clarity and consistency in stormwater standards discussed in the NPDES permit and those discussed in the airport's December 2000 Stormwater Management Plan (SMP).

1. Permit Condition S1.E (Page 11 of 53) and Condition S5.B (Page 24 of 53) include exemptions for untreated wastewater overflows "due to stormwater flows in excess of the design criteria. . ." In the context of Condition S1.E these overflows are "authorized bypasses" that are not subject to discharge limitations. In the context of Conditions S5.B these overflows "will not be considered a bypass and will not constitute a violation. . ." The problem with these conditions is that there is no clear or enforceable definition of stormwater flow design criteria included in the original permit or in the proposed permit major modification. We recommend that the proposed major modification be republished for public comment after it is amended to include a summary of IWS system design criteria including the design criteria for stormwater flows which would (and would not) result in wastewater overflows from the IWS system into the storm drain system. Alternatively, it should identify IWS system performance expectations including the frequency and duration of stormwater-related overflows which are anticipated and are proposed to be allowed without constituting a

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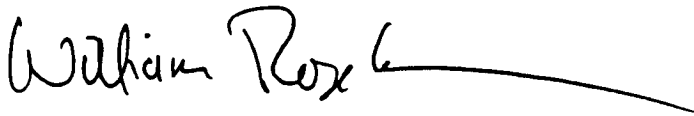
violation of the permit. This information is necessary for informed public comment on the proposed major modification, to interpret/enforce the permit condition, and to ensure that the storm drain systems are appropriately sized to handle expected IWS overflows.

2. Permit Condition S14 (Page 47 of 53) states, "All construction actions taken by the Permittee shall provide sufficient detention and/or shall use existing available detention capacity, in accordance with the Stormwater Management Manual for the Puget Sound Basin or its approved equivalent, to prevent an increase in the peak flow rate or flooding frequency of Miller Creek and Des Moines Creek". The problem with this language is that it specifies (and requires) a stormwater standard for the Third Runway and Master Plan Update projects which is inconsistent with and less stringent than the SMP "updated" detention standards (SMP Section 2.1.4) sought by others at Ecology as a condition of Section 401 Certification for those same projects. We recommend that the NPDES permit should be modified to define the "updated" detention standards as part of the permit language and to require that those updated standards be met for all new and retrofit construction.

Thank you for your consideration of these comments. We request on behalf of the Airport Communities Coalition that this letter (to Ann Kenny) be placed in the 401 record and also (to Kevin Fitzpatrick) be placed in the NPDES record.

Sincerely,

NORTHWEST HYDRAULIC CONSULTANTS, INC.



William A. Rozeboom, P.E.  
Senior Engineer

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