

# Water Resources Consulting L.L.C.

Peter Willing, Ph.D.

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March 12, 2001

Mr. Chung Yee  
Washington State Department of Ecology  
3190 160<sup>th</sup> Ave. S.E.  
Bellevue, Washington 98008-5452

RE: NPDES Permit Major Modification

Dear Mr. Yee,

The following comments on the proposed draft NPDES permit no. WA-002465-1 for SeaTac Airport are submitted to you on behalf of the Airport Communities Coalition. This letter makes two main points:

- The draft permit offers a blank check approval of future discharges at unknown locations. Such a permit would allow the Port to pollute the state's waters with impunity, and would deprive the State and its citizens the vital knowledge of where and how the Port's discharges will affect State waters.
- The reporting requirements of the permit must be revised to require the data needed to interpret dissolved metals concentrations.

The Port of Seattle has requested a permit that allows the discharge of unknown pollutants, in unknown amounts, at unspecified locations, into unspecified receiving waters, at unknown times in the future. This request is obviously desirable for the Port's purposes, but it serves the people of Washington State very badly and must not be granted. It allows the Port to cause harm through pollution to beneficial uses of waters of the State, at any time, in any place where the Port chooses to operate. The modified permit should be specific as to the character of discharged pollutants, the exact locations where discharges will be allowed, and the exact premises which are intended to be covered by the discharge permit modification. The State must not abdicate its access to information, its oversight responsibility, and its citizens' opportunity for informed review of the Port's discharge practices.

Neither the existing permit nor the proposed permit require the permittee to collect or report water quality data that are necessary to ascertain whether a given concentration of metals is in compliance with water quality criteria. Numeric water quality criteria for metal pollutants are a function of hardness (WAC 173-201A-040). Hardness data should be reported on the monthly DMR's (Discharge Monitoring Reports) as follows: 1) they should be based on samples taken concurrently with and from the same source as the metals samples; 2) they should be reported on the same page as the metals concentrations; 3) the meaning of the data should not be obscured by the use of median values or other summary statistics. To bring this result about, the modified permit, Monitoring Requirements, section S2. A, Stormwater, should be amended by insertion of an extra line for hardness in the accompanying table. Note c should be amplified to include point 1) above. Hardness should be analyzed either by calculation based on calcium and magnesium concentrations, or by the EDTA method; the reported results should say which method was used.

Mr. Chung Yee

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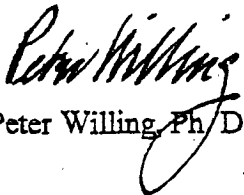
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The Port of Seattle's Annual Stormwater Monitoring Reports for SeaTac Airport have the same problem as the DMR's. The annual reports are intended to "present the analytical data, the Port's conclusions as to what is being learned from the data, and any new initiatives to be undertaken as part of the Stormwater Pollution Prevention Plan..." (Draft Permit, Section S2.E). The most recent Annual Stormwater Monitoring Report for July 1999 through June 2000 defeats this purpose by submerging the airport monitoring data in a sea of irrelevant data from other jurisdictions. It also makes the metals concentrations impossible to interpret by separating them from the hardness data. Instead of showing hardness data that corresponds with the metal sampling sources, it substitutes an across-the-board hardness value of 56 mg/l which purportedly is the median of seven samples collected in 1999 - data for which are not shown. Using median values dilutes the observations downward and dilutes the criterion upward, in both cases hiding water quality violations. 56 mg/l is higher than any hardness values the Port has reported before: the median of 12 values reported in the previous Annual Monitoring Report is 14 mg/l. Under the State Water Quality Standards, if one accepted the 14 mg/l median as valid, all of the five values shown in Appendix B are in violation, by up to 9 times the chronic toxicity standard for copper, and 7 times for lead. The effect of this distorted and selective "cooking" of the data is to make it look as though the metals concentrations comply with the water quality standards, when in fact they constitute a significant contribution to the violation of those standards. This interpretive sleight of hand could be dispensed with if the monitoring requirements were written so as to require straightforward reporting of relevant data.

The proposed NPDES Permit modification requires revision. The Department of Ecology must not issue it until all discharge locations, discharge sources, and receiving waters are identified in the permit, with appropriate opportunity for public comment.

Thank you for considering these comments on the Major Modification of the Port of Seattle's NPDES Permit for SeaTac Airport.

Sincerely,



Peter Willing, Ph.D.

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