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Parametrix, Inc.

Consultants in Engineering and Environmental Sciences

5808 Lake Washington Blvd. N.E. Suite 200 Kirkland, WA 98033-7350
425-822-8880 • Fax: 425-889-8808



MEMORANDUM

To: Scott Tobiason

September 20, 1999

From: Ken Ludwa, Paul Fendt, Linda Logan

55-2912-01 (61)

Re: Review of 1999 Annual Stormwater Report

We have reviewed the first draft of the 1999 Annual Stormwater Report. In addition to the handwritten margin comments that are attached to this memo, please consider the following comments:

- Consider adding more description of the Portland NPDES study, particularly why it is relevant and comparable to STIA data. Unless this study is more comparable for other parameters as well, you may wish to reconsider changing the comparator for only copper. Particularly, the report states initially (page 10) that the instream Bellevue samples are used for a conservative comparator, but for copper (page 18) the Portland (outfall) study was used. Because the comparators by their nature are arbitrary, they should be consistent between years and between parameters.
- "Trimmed" data sets are discussed several times. The methods section should explain the statistical validity of this procedure. Is there a more formal statistical term for this procedure?
- Although TSS concentrations and turbidity decreased after the addition of the construction wheel wash, other factors may have also attributed to the decrease:
 - Other BMPs also became effective; for example, grass germinated after the first rains. Some disturbed soil surfaces may have also "settled" after the first few storms.
 - New SDS pipes were installed for the taxiway work; some soil in the pipes may have affected results of the first few storms, but would have eventually flushed out, and therefore not affected later storms.
 - Sediment on roadways, tracked over the course of the summer, may have also affected results of the first few storms, but would have flushed off, and therefore not affected later storms.
- Section 4.5.3 states that standards apply to the receiving waters. This is true only if a mixing zone is allowed; otherwise, standards must be met at end-of-pipe. A determination has not been made as to whether STIA's stormwater discharges will be allowed a mixing zone. The first paragraph of section 4.5.3 should be deleted. Also, throughout the report, the term "receiving water criteria" should be replaced with the term "water quality standards."
- Sections of the report state that the Port will petition Ecology to remove certain monitoring requirements (e.g., sampling requirements for SDS1 and SDN2) and concludes that WET limits are not indicated. Is this report the appropriate vehicle for making these



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determinations or requests? Consider deleting this language from the report and attaching a letter with a formal request for these items, documenting the reasoning for the requests. Some of these determinations may be subject to negotiation with Ecology.

- Section S12.B.2 of the NPDES Permit requires that noncapital BMPs be implemented within two weeks and capital BMPs within 6 months of identifying sources of potential or actual pollutant discharge. Does inclusion in the Annual Report constitute "identification" of sources (e.g., Executive Summary, Section 4.6.2, Section 4.7.1), and start the schedule? Unless a positive identification has been made of the source and a SWPPP update formulated and ready to implement, keep language in these sections tentative as possible.

If you have any questions regarding these comments, please call us at (425) 822-8880.

cc: Tom Hubbard
Elizabeth Leavitt
Keith Smith

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