

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

MODIFICATION TO WASTE DISCHARGE PERMIT NO. WA-002465-1

PORT OF SEATTLE

SEA-TAC INTERNATIONAL AIRPORT

RESPONSE TO COMMENTS

Public Meeting and Hearing Held:
Burien, WA - June 12, 1996

Prepared by Lisa Zinner, P.E.
August 22, 1996

AR 026790

INTRODUCTION

The Department of Ecology has modified National Pollutant Discharge Elimination System (NPDES) Permit No. WA-002465-1 issued to the Port of Seattle for discharge of treated industrial wastewater and stormwater from Sea-Tac International Airport.

Public notice of the intent to modify the permit was published on April 3, 1996 in the Seattle Times south edition.

A Public Meeting and Public Hearing were held in the Burien Public Library on Wednesday, June 12, 1996, to provide an opportunity for the public to find out more information about the draft modification and to receive formal testimony regarding the draft modification. Public notice of the meeting and hearing was published in the Seattle Times south edition and in the Highline News/Des Moines News on May 8, 1996. The written comment period for the modification closed on July 12, 1996, 30 days after the public hearing.

As a result of questions and concerns raised in the public meeting, public hearing and written comment, the draft permit modification was re-examined and some revisions were made to the permit modification. The responsiveness summary is intended to reflect substantive comments, concerns and recommendations on the proposed permit raised during the public hearing and written comment period and to state Ecology's response to those same substantive comments, concerns, and recommendations.

ORGANIZATION OF THE RESPONSIVENESS SUMMARY

A transcript of the comments made during the Public Hearing is attached as Appendix A. Each letter received during the written comment period has been reproduced in its entirety in Appendix B. Each substantive comment raised in the hearing and in each letter is answered in the following section.

RESPONSE TO QUESTIONS AND COMMENTS

PUBLIC HEARING

1. Testifier: **Tom Hubbard**

Response: General comments noted.

2. Testifier: **Robert Pearce**

Comment: I think it is a bit ludicrous for the Department of Ecology to trust the Port of Seattle to take all the water samples.

Response: The concept of self-monitoring has been a cornerstone of the NPDES permit program since its inception. Section 308 of the Clean Water Act gives the authority to require Permittees to monitor their effluent. Experience with the program of self-monitoring has shown that, in general, dischargers can be relied on to furnish accurate and representative data on effluent quality. Specific language in the permit requiring representative sampling and reporting of all relevant discharge records, coupled with periodic inspections by the Department, serve to reduce the submittal of erroneous information. Fraudulent reporting also subjects the Permittee to criminal prosecution.

Comment: The amount of water coming down Miller Creek is a major concern. There is erosion occurring as a result of the water flow. I would like to see the Department of Ecology become more involved in assessing where the water's coming from and what to do about the erosion problems that are taking place down in the lower part of the creek.

Response: The NPDES permit is issued to the Port of Seattle for industrial wastewater and stormwater discharges from Sea-Tac Airport. Stormwater discharges to Miller Creek are regulated through this permit. Sea-Tac Airport is only five percent of the Miller Creek drainage basin. Stream flow conditions in Miller Creek are a function of the development in the entire basin. Efforts to improve stream flow conditions by improving the efficiency of existing regional stormwater detention facilities and by constructing new facilities should be addressed as part of basin planning activities jointly conducted by King County Surface Water Management Division, the Port of Seattle, and the cities of Burien, Des Moines, and SeaTac.

The Department is concerned about the effect of the drainage leaving Sea-Tac Airport to both Miller and Des Moines Creeks. Special Condition S16 has been added to the permit to required the Port to assess the impacts of development at the airport on the hydrology in both creeks.

3. Testifier: **Minnie Brasher**

Comment: I want to know the process for fining. The Port's pretty much had its way for years and years, and I would like to know what the DOE is going to do about it.

Response: The Department of Ecology's enforcement policy is geared towards gaining compliance from a Permittee in a cooperative manner. If cooperation does not succeed, formal administrative enforcement may follow. Formal administrative enforcement consists of:

1. A Notice of Violation (NOV) is issued. The Permittee is notified of a violation and is given 30 days to respond to the Department regarding the specific events that led to the violation.
2. After the response to the NOV is received, the Department issues an Administrative Order requiring the Permittee to take action to prevent the effluent violation from occurring again and to remediate damages which may have occurred as a result of the violation.

3. The Department determines if a penalty is warranted after receiving the response to the NOV. A penalty is issued, if warranted, at the same time as the Administrative Order. The amount of the penalty is determined using a matrix that was developed by the Department to insure consistency in penalty determination. The factors which are taken into account by the penalty matrix include:
- severity of the violation;
 - the threat to human health and/or the environment;
 - whether the violation was intentional;
 - previous record of violations;
 - economic benefit of noncompliance; and
 - degree of cooperation of the violator in working toward compliance.

Comment: I want to know if there was a formal request for a runoff in the RSA.

Response: The Department was notified of the RSA project through the SEPA process. The RSA project is not adding an additional outfall, therefore there was not a formal request to add an outfall from this area to the permit. Drainage from the RSA will be discharged through existing Outfall 009 (SDS4).

Comment: Be sure to indicate that Outfall 012 discharges to Gillian Creek, not the Green River.

Response: The Department considers the receiving water for Outfalls 012 and 013 to be the City of SeaTac storm sewer. The cover page has been modified to indicate that Outfalls 012 and 013 discharge to the City of SeaTac storm sewer, which is tributary to Gillian Creek and the Green River.

Comment: Make sure the monitoring of the outfalls is done as soon as possible.

Response: The monitoring requirements which are new in the modified permit will be effective on the effective date of the modification. The effective date is a function of the time required to conduct public notice, hold a public hearing, and take the public comment into consideration.

Comment: It should include everything that's monitored in Des Moines Creek and Miller Creek, not just the things that are in the permit.

Response: The parameters which have been included in the permit for each outfall are a function of the activities which are occurring in the drainage for that outfall. The Department believes that the chosen parameters are appropriate for each outfall.

4. Testifier: Shawn McEvoy

Comment: We would like to voice our concern about the exclusion from the permit of the outfalls of 12th Ave. South from the west side of the airfield. We suspect this area has been used to store sludge, and possibly other harmful contaminants. The Port of Seattle's refusal to sample this area even once certainly elevates our concern. The Port of Seattle contention that all materials in the area were to be removed by March 1st was fanciful, and no doubt, was not accomplished. We would like to see this outfall area included in their permit as a safeguard, as an incentive to perform. After successful removal of this material, we would acknowledge this area's outfalls could be removed from the permit.

Response: The Department has inspected the area along 12th Ave. S. and does not agree that this drainage area should be included in the permit. The tennis court area, which was used to store materials in the past, is currently used to store only fiberglass air mail containers, which do not pose a threat of contamination to stormwater. An adjacent area, which does not drain to surface water, contains stockpiles of waste fill material. Since this area infiltrates to groundwater, it also will not be added to the permit. The Port has been instructed to remove these piles from the area and to properly dispose of the material.

Since this area is contained in the future expansion plans by the Port, this area will be added to the permit in the next permit cycle.

Comment: We are of the understanding that the previous hazardous material storage area will be closed in an official manner, and in accordance with all the necessary soil sampling and other procedures. If this is not the case, we would like this area properly addressed as well.

Response: The Department has determined that the previous hazardous material storage area (dangerous waste 90-day accumulation area) has been closed in accordance with the requirements of the Washington State Dangerous Waste Regulations, Chapter 173-303 WAC.

Comment: We are concerned that recent construction projects have been planned and undertaken with little notification to the community. We would like to see the previous notification procedures instituted.

Response: This issue does not pertain to the modification to the NPDES Permit.

5. Testifier: Norman Foster

Comment: I also share a major concern about the quantity of water that is being discharge into Miller Creek. There has been, this winter, a tremendous deposit of silt on the stream bed

and gravel banks, destroying the fish-farming habitat, and I'd like to see this addressed by the Department of Ecology.

Response: The Department shares your concern about the quantity of water that is being discharged from the airport to both Miller and Des Moines Creek. Special Condition S16 has been added to the permit in response to this concern. This condition requires the Port to prepare a Stormwater Drainage Report which assesses the quantity and peak flow rate of water which is discharged from the airport to both creeks and to compare this with the quantity and peak flow rate of water which was discharged in 1974. The Stormwater Drainage Report will take into account all of the planned construction through June, 1997. The Stormwater Drainage Report will be amended prior to any planned increase in impervious surface, or any other action which may adversely affect the hydrology in either creek, at the airport.

6. Testifier: Greg Wingard

Comment: I have a concern the new Outfall 011 was constructed in 1995 and made operational without specific information going to the Department of Ecology, as per the protocols of the permit.

Response: The Port has been informed that the construction of Outfall 011 should have been approved by the Department prior to construction. Since that time, the Port has submitted several engineering reports, plans and specifications on proposed modifications to the wastewater collection and treatment system at the airport. The Port is aware of this requirement and will not make unapproved modifications in the future.

Comment: I understand that the Port of Seattle has named themselves their only agency for SEPA, and routinely issues themselves DNS's for the determination of nonsignificance, which helps them basically keep to a minimum the level of public participation.

Response: This issue does not pertain to the proposed modification to the NPDES permit.

Comment: The NPDES permit has specific requirements about notification that I want to see Sea-Tac Airport follows and would encourage Ecology to see that it happens.

Response: The Department agrees with this comment.

Comment: The hundreds of thousands of cubic yards of fill that are involved in the safety area have their own potential for the release of pollutants, that would be suspended solids into the stormwater. That's a big concern to myself and for a lot of members of the community.

Response: The Department has inspected the construction area for the RSA and has determined that the Port and its contractors have implemented the necessary Best Management Practices required to protect Des Moines Creek from discharge of sediment.

Comment: Ecology should require Sea-Tac Airport to commit to a specific expedited schedule for closing the hazardous waste storage facility, in compliance with all laws, assuring that there are no contaminants discharging out of 188th Street outfalls.

Response: The Department has determined that the previous hazardous material storage area (dangerous waste 90-day accumulation area) has been closed in accordance with the requirements of the Washington State Dangerous Waste Regulations, Chapter 173-303 WAC.

Comment: A new outfall, 015, which is called the Subbasin D, covers the area of sludge disposal just north of the IWS Lagoons 1 and 2. The text states that sludges from "Lagoons 1 and 3" were exposed up there. That should be corrected, as stated, "Lagoons 1 and 2."

Response: The text in the Fact Sheet Addendum has been changed to say "Lagoons 1 and 2."

Comment: While the Department of Ecology states that there are no current industrial activities in this area, numerous discharges of pollutants have been noted in this location, and the spill of fuel from the lagoon system was documented at that location in the summer of 1995.

Response: Since this area has been added as an outfall to the permit, this comment does not affect the decision on whether the area should be added to the permit. The area which drains to the outfall does contain conveyance piping and manholes for the IWS. The new Snow Removal Equipment Building will also be located in this area.

Comment: It is important that the permit show that the discharges from Outfall 012 and 013, the Engineering Yard and Taxi Yard, go to a local creek, not the Green River (Gillian Creek).

Response: The Department considers the receiving water for Outfalls 012 and 013 to be the City of Sea-Tac storm sewer. The cover page has been modified to indicate that Outfalls 012 and 013 discharge to the City of SeaTac storm sewer, which is tributary to Gillian Creek and the Green River.

Comment: Condition S3.B.4 requires testing of Outfalls 014 and 015 quarterly for three quarters, annually thereafter. The requirement should be to monitor quarterly through the life of this permit.

Response: Assuming that the permit modification becomes effective in August, 1996, the remainder of the permit term is ten months, which allows for three quarterly samples.

Comment: Outfall 010 monitoring should be modified to per quarterly, rather than annually, based on its history of discharges and design.

Response: Bypass events which have occurred from this outfall would not affect routine stormwater monitoring. Bypass or spill events are sampled during the event in accordance with the Spill Control and Countermeasure Plan (SPCC). Routine stormwater monitoring is

meant to assess the need for and the effectiveness of Best Management Practices to prevent the contamination of stormwater by ongoing industrial activities. The Department will reassess the monitoring requirements for Outfall 010 and all of the other stormwater outfalls during the permit renewal process next year.

Comment: There should be a requirement added that in the case of odor, foam, or visible sheen being seen on any of the outfalls that a grab sample should be taken of that material.

Response: This requirement is currently contained in the Stormwater Pollution Prevention Plan. Any unusual discharge, such as odor, foam, or visible sheen, seen at a stormwater outfall should be assessed and the source of contamination remediated.

7. Testifier: Al Furney

Comment: I did not have the opportunity to ask the question to the Department of Ecology members as to whether or not a hydrological study had been done as to the impact of the additional outfalls on the stormwater flow into Miller Creek. If that has not been done, I would strongly urge the Department of Ecology to do so, and provide the community an understanding of what the magnitude of the impact of the outfall would entail.

Response: Special Condition S16 has been added to the permit in response to this concern. This condition requires the Port to prepare a Stormwater Drainage Report which assesses the quantity and peak flow rate of water which is discharged from the airport to both creeks and to compare this with the quantity and peak flow rate of water which was discharged in 1974. The Stormwater Drainage Report will take into account all of the planned construction through June, 1997. The Stormwater Drainage Report will be amended prior to any planned increase in impervious surface, or any other action which may adversely affect the hydrology in either creek, at the airport.

Comment: I've had the opportunity to participate with members of the public in a process which appealed the Department of Ecology's recent issuance of the storm NPDES permit to the Pollution Control Hearings Board in the State of Washington. And subsequent to that, I participated in a citizen action filing of a lawsuit. I'd just like to emphasize that we are quite willing to do that again, if the Department of Ecology is not forthcoming in enforcing the strictures of the Clean Water Act, as well as the provisions of the existing settlement agreements that exist in King County here in Superior Court.

Response: The Department acknowledges your effort to be involved in NPDES issues at the airport and supports your right to permit appeal and to take action under the citizen's lawsuit provision of the Clean Water Act.

8. Testifier: Allen Miller

Comment: We are particularly concerned about the definition of "significant amounts" of additional water flow. This is a very subjective type of thing and leads to incremental

degradation. We encourage the Department of Ecology to expand and more crystallize the definition of "significant" and "nonsignificant," and look it holistically over time, in terms of impact on the watershed.

Response: Special Condition S16 has been added to the permit in response to this concern. This condition requires the Port to prepare a Stormwater Drainage Report which assesses the quantity and peak flow rate of water which is discharged from the airport to both creeks and to compare this with the quantity and peak flow rate of water which was discharged in 1974. The Stormwater Drainage Report will take into account all of the planned construction through June, 1997. The Stormwater Drainage Report will be amended prior to any planned increase in impervious surface, or any other action which may adversely affect the hydrology in either creek, at the airport.

Comment: We would like the NPDES to better reflect the water quantity issue. I would like to put it beside the quantity discharge rate as volume per time.

Response: See the above response.

Comment: I'd like to echo Mr. Wingard's comments about odor, sheen and foam.

Response: See the response to Mr. Wingard's comment on page 8.

Comment: The issue of self-issuance is not as good as a determination procedure, in lieu of formal review processes for these construction issues, seems to us to be not in the spirit and perhaps the intent that the NPDES was trying to accomplish.

Response: The Department assumes that this comment is regarding the Port acting as the leading agency in SEPA determinations for projects proposed by the Port at the airport. This comment does not pertain to the modification of the NPDES permit.

WRITTEN COMMENT

1. Author: **Karen Keiser, State Representative**

Comment: I look forward to working with the Department on the many important issues still outstanding. A comprehensive groundwater characterization study will be a crucial element in this process.

Response: Comment noted.

2. Author: **Helen D. Kludt**

Comment: I am concerned about the addition of new outfalls from the Port of Seattle property into Miller Creek. Considering the beauty of the area and its history as described above, I feel that the addition of new outfalls from the Port of Seattle property must be

prohibited. The failure to provide any analysis of the impact of the proposed new outfalls is a serious issue that must be addressed prior to the issuance of a permit modification by the Department of Ecology.

Response: The new outfall to Miller Creek which is included in the modification of the NPDES permit does not add new impervious surface to the drainage area of Miller Creek, but drains existing runway area. This drainage area is attenuated by Lake Reba, which was constructed as a stormwater detention facility for the drainage from the airport into Miller Creek. Special Condition S16 has been added to the permit to provide written documentation of the effect of the drainage from the airport on Miller (and Des Moines) Creek.

3. Author: Barbara H. Stuhling

Comment: Outfall 014 and 015 - both discharge to a ditch along 188th. The ditches appear to have industrial waste (checked yesterday). 188th is impacted with a traffic jam throughout the day because of airport construction, so the contents of the ditches may be affected by pollution from cars and trucks. But it appears that the outfalls should discharge to the IWS and not to ditches. Also the ditches can't handle the heavy rains which was verified during the last storm. Fire training in this area produces foam and other chemicals which are not compatible with stormwater. In fact, the foam is not properly treated by the Port's IWS.

Response: The Department has inspected the areas discharging to the outfalls along South 188th Street and has determined that industrial wastewater is not discharging through the stormwater outfalls. The stormwater runoff from the street does enter the ditch (that is the purpose of the ditch), therefore the contents of the ditch are affected by the cars and trucks on the road. The sizing of the ditch is dictated by road design standards for the jurisdiction which controls the road (currently the City of SeaTac). It is not practical to design stormwater conveyances, such as road ditches, to handle the most extreme storm events.

Fire training in the fire training pit is no longer performed with fire fighting foam, only with fuel and water. Fire fighting training will not be performed at the airport at all in the near future, after a new facility is opened in North Bend. The disposal of fire fighting foam in the case of a fire in a hanger is being addressed in the IWS Engineering Report.

Comment: Outfall 015 - note the report on sludge contamination (which is attached). The sludge "farmed" over a wide area may be a hazard to Washington State waters because it has contaminated the ground down to 15 feet in places. Past Port practices have been shoddy.

Response: The Port voluntarily conducts ground water monitoring down gradient of the IWS lagoons and the area of sludge disposal discussed in the attached report. This data will be used to determine impacts on ground water from the sludge disposal area and from the IWS lagoons. Since Lagoon 1 is being cleaned and lined this summer and Lagoon 2 will be cleaned and lined next summer, these wells will eventually be able to show impacts from the sludge application area alone, if impacts exist. The Department will assess compliance with the requirements for ground water quality protection during the permit renewal next year.

Comment: Outfall 012 - these water enter Gillian Creek from the SeaTac stormwater system. And the Port is responsible for any contamination occurring. There are toxic products stored at the engineering yard (see attached) so these waters should be directed to the IWS, not to eventual discharge in the Green River. Please put a name - Gillian - to the creek mentioned in the DOE addendum.

Response: The permit has been changed to indicate that the City of SeaTac storm sewer drains to Gillian Creek, which is tributary to the Green River. The Department of Ecology has inspected the engineering yard and did not find toxic products being stored there. The transformer fluid referred to in the attachment to your comments has been removed from the engineering yard. Transformers are drained prior to storage and are stored inside the building at the engineering yard. The floor drain inside the engineering yard storage building drains to a underground tank which would contain spills if they occurred inside the building.

Comment: Add testing of surfactants to the outfall servicing the new snow storage shed., I believe it is one of the above. Confirm that soap water will discharge to IWS.

Response: The Port will not be allowed to wash snow removal equipment with soap at the snow storage shed. The Port will be able to rinse equipment off with water on a pad that will drain to the IWS. No chemical storage and no vehicle maintenance will be allowed at the shed.

Comment: The Port continues to piecemeal its third runway plans, i.e. runway safety area, fuel rack, snow shed. I feel the number of run-off testings should be more frequent and strict. Vigilant DOE actions at this point may pre-empt further lawsuits as the impact from Port activities continues to increase. It would be a good move on DOE's part to go to Tyee Golf Course for an overall view of the latest project - the runway safety area expansion.

Response: The Department has inspected the airport, including the runway safety area expansion. The Department believes that the frequency and parameters of concern for stormwater monitoring are sufficient at this time. All of the stormwater data will be reassessed when the permit is renewed next year to determine if changes are appropriate in the stormwater monitoring program.

4. Author: Minnie O. Brasher

Comment: Outfall 011: Ecology should have fined the Port of Seattle for constructing this outfall without consulting Ecology. The Port of Seattle will never conduct proper environmental policies without this kind of oversight.

Response: The Port has complied with the requirement for review and approval of modifications of the wastewater collection and treatment system at the airport since this oversight was brought to their attention. This is an example of how cooperative management of the NPDES permit by the Department and the Port has attained compliance with the permit.

The Department remains committed to ensuring compliance with this and all NPDES permits and will use formal enforcement action against the Port in the future if necessary.

Comment: Outfall 012: Flows from this outfall should be tested for pollutants by the Port of Seattle before going into the City of SeaTac and Gillian Creek. Hazardous materials are stored in underground storage tanks at the engineering yard/building. Has the DOE monitored this site for possible contamination into outfall 012?

Response: Monitoring is required at Outfall 012 for pH, oil and grease, and total suspended solids on a quarterly basis. The Department has not taken samples of the discharge into the catch basins at the engineering yard. An inspection of the engineering yard determined that the pollutant of greatest concern at the engineering yard is total suspended solids due to the storage of sand which is applied to the roads at the airport in the winter.

Comment: Outfalls 014 and 015: These outfalls discharge into the ditch along 188th street. During heavy rainfall the ditch is at overflow. Stagnant water remains in the ditch for weeks at a time. Does this pose a health problem? Has this been checked by DOE? Outfall 015 drains runoff water from land that contains polluted sludge from the lagoons. Has the ground soil in this area been tested by DOE?

Response: The Department does not believe that standing water in the drainage ditch along South 188th Street is a health problem, but health issues are not regulated by the Department. The Seattle-King County Department of Health regulates health issues in King County and the Department of Health regulates health issues on the state level. Standing water has encouraged wetlands-type plants to grow in the ditch, which encourages removal of pollutants from the runoff from the street and from the airport. The Department has not performed soil or water testing in the vicinity of Outfall 015. The Port will be required to monitor the discharge from Outfall 015 in the modified permit.

Comment: Water runoff from Runway 34R extension under construction at Sea-Tac Airport should have been entered into the existing Port of Seattle NPDES permit. Was this action given any thought by the DOE?

Response: The runoff from the Runway 34R extension (Runway Safety Area) drains to existing stormwater Outfall 009 (SDS-4).

5. Author: Allan M. Furney

Comment: New Outfall 011 (area SDN4) was constructed in 1995. The public should have been informed of this activity through a public hearings process and the Department of Ecology (DOE) should have required that the Port conducted a public notification process prior to allowing this activity to proceed. The extent to which the new outfall impacts stormwater runoff has not been studied, and the impacts upon groundwater are as of yet undisclosed.

Response: The Department conducts public notice and hearing when an action is taken such as permit modification or issuance. It was wrong of the Port to add an outfall without obtaining a modification of the permit prior to the discharge, although the settlement agreement required modification of the permit for additional outfalls and this process was underway. This will not be allowed to occur again.

Special Condition S16 has been added to the permit to determine the impact of all changes to the drainage areas at the airport on Miller and Des Moines Creek. It is unclear though how this outfall could impact ground water.

Comment: DOE should review the terms the Stipulated Settlement Agreements existing between the residents in the Miller Creek Basin and the Port of Seattle and King County and assure that the addition of outfall 011 as well as other outfalls contemplated in this permit do not violate provisions of these agreements as well as other requirements established for local surface water management including requirements for on-site stormwater detention.

Response: Special Condition S16 has been added to address this concern.

Comment: Prior to issuance of any permit modification, a study should be provided indicating the effect of the additional outfalls upon average and maximum stormwater flow rates. Additionally indicate what steps will be taken to assure that on-site retention of stormwater will be provided to assure that the existing flow rate in Miller Creek will not be increased. Provisions in the permit to assure that the retention capacity of the stormwater facility will not allow flow rates from the outfall to exceed the natural capacity of Miller Creek consistent with existing settlement agreements should be provided. Since, according to testimony by DOE official at the public hearing, the new outfall is apparently intended to "replace" two outstanding outfalls, include in the analysis a study of how the flow rates from the existing outfalls will be affected. It is also important to require in the permit modification provisions for additional monitoring for the new outfall and that monitoring of flow rates begin as soon as possible.

Response: Since Outfall 011 does not add additional impervious surface to the drainage area of Miller Creek, the Department does not believe that the drainage from this outfall will impact the natural capacity of Miller Creek. This outfall, as well as the other outfalls on the north end of the airport, drain to Lake Reba, which is a detention facility constructed per the settlement agreement referred to in your comment.

The provisions for monitoring for the additional outfalls in the modification will become effective immediately upon issuance of the modification.

Comment: Another concern surrounds recent construction at the south end of the airport where fill and asphalt has been unloaded without informing Department of Ecology. The concern is that there will be an increase of discharges not covered by the NPDES permit. The activity impacts stormwater runoff, and has yet undisclosed impacts upon groundwater yet the public has not been informed concerning the extent of this activity and its impacts. The public

should have been informed of these planned activities through a public hearings process and the Department of Ecology (DOE) should have required that the Port conducted a public notification process and public comment prior to allowing this activity to proceed. These events provide another example of why DOE must keep better track of STIA action impacting the NPDES permit.

Response: The Department is routinely sent SEPA documents for activities at the airport. The Department was aware of the construction of the Runway Safety Area at the south end of the airport through these SEPA documents and discussed the changes with the Port.

Comment: Ecology should require STIA to commit to a specific expedited schedule for closing the hazardous waste storage facility in compliance with the law. This requirement should be included as a provision in the permit modification.

Response: The Department has determined that the previous hazardous material storage area (dangerous waste 90-day accumulation area) has been closed in accordance with the requirements of the Washington State Dangerous Waste Regulations, Chapter 173-303 WAC.

Comment: New outfall 015 (area Subbasin D) covers the area of sludge disposal just north of IWS Lagoons 1 and 2, The text states that sludges from Lagoons 1 and 3 were disposed of there. This should be corrected to state Lagoons 1 and 2. While Department of Ecology state there are no current industrial activities in the area, numerous discharges of pollutants have been noted from this location a spill of fuel from the Lagoon system was documented there in the summer of 1995. This should be corrected in the DOE statement concerning this permit modification.

Response: The lagoon number typographical mistake has been corrected. The Subbasin D area contains conveyance piping and manholes for the IWS and is the future location of the Snow Removal Equipment Storage Shed.

Comment: Outfall 012 (Engineering Yard) and outfall 013 (Taxi Yard) discharge location descriptions in the permit have been modified to state they discharge to the Green River, not Des Moines and Miller Creek. In fact these outfalls discharge via the City of SeaTac storm sewers to Gillian Creek, not Green River. It is important that the modified permit be corrected to show these discharges go to a local creek (Gillian Creek), not the Green River.

Response: The Department considers the receiving water for Outfalls 012 and 013 to be the City of SeaTac storm sewer. The cover page has been modified to indicate that Outfalls 012 and 013 discharge to the City of SeaTac storm sewer, which is tributary to Gillian Creek and the Green River.

Comment: The requirement for testing of outfalls 014 and 015 should be quarterly through the life of this permit. I should also be requested that outfall 010 monitoring should be modified to occur quarterly, rather than annually, based on its history and design.

Response: Due to the expected issuance date of the modification, quarterly monitoring will be through the remainder of the permit term. The Department does not agree that the monitoring or Outfall 010 should be increased at this time.

Comment: The DRAFT REVISION permit and following Fact Sheet contains a number of inaccuracies, such as where the Fact Sheet indicated Lagoon 1 and 2 have a clay liner, when in fact no liner exists. This should be corrected in the permit.

Response: The original fact sheet is not modified in a permit modification; a fact sheet addendum is prepared instead. The fact sheet will be revised when the permit is renewed next year.

Comment: The Department of Ecology should inform the public in the initial fact sheet that the additional materials were included to provide context for this permit modification and were not updated by the agency to correct errors. This would help avoid confusion which otherwise will occur.

Response: The Department apologizes for any misunderstanding which occurred due to the presentation of the proposed modification and fact sheet addendum.

Comment: The Implementation Guidance for the Ground Water Quality Standards makes it clear that a groundwater monitoring program is necessary at Sea-Tac and that a study of groundwater is required in order to meet the requirements under WAC 173-200. This issue should be addressed in the proposed permit modification.

Response: Impacts on groundwater by the fueling process at the airport are being handled through the Toxics Cleanup Program at this time. The Department will assess the need for a study of the impacts on ground water by the industrial processes at the airport in the renewal of the permit next year.

Comment: There are a number of outstanding issues related to the existing permit. These discharges from STIA such as fecal coliform and glycols, and the failure of STIA treatment plant to treat many of the pollutants in that discharge through it. An article in the Seattle Post Intelligencer May 10, 1996, noted that Sea-Tac Airport "reported in May 1994, that it had violated the federal standard for fecal coliform, which can cause illness."

Response: All of the "outstanding issues" will be addressed in the renewal of the permit next year.

6. Author: Greg Wingard

Comment: New outfall 011 (area SDN4) was constructed in 1995. Port of Seattle (POS) failed to notify Ecology, as required by their permit that they were making a major modification/addition to their stormwater outfall system. POS must be held accountable for reporting impacts related to its NPDES permit before they occur as required by the permit.

Response: The Department agrees with this comment.

Comment: New outfall 014 (area Subbasin B) covers the area where the fire pit and associated fuel tank are located. Ecology should require the POS to commit to a specific expedited schedule for closing the hazardous waste storage facility in compliance with the law, and confirming that the discharge pipe and associated ditch that are a part of this basin are not contaminated.

Response: The Department has determined that the previous hazardous material storage area (dangerous waste 90-day accumulation area) has been closed in accordance with the requirements of the Washington State Dangerous Waste Regulations, Chapter 173-303 WAC.

Comment: New Outfall 105 (area Subbasin D) covers the area of sludge disposal just north of IWS Lagoons 1 and 2. The test states sludge from Lagoons 1 and 3 were disposed of there, this should be corrected to state Lagoon 1 and 2. While Ecology states there are no current industrial activities in the area, numerous discharges of pollutants have been noted from this location and a spill of fuel from the Lagoon system was documented there in the summer of 1995. There are also interties there with the IWS system that under a variety of circumstances (such as a fuel spill) will allow bypass to this outfall. Ecology should correct the language describing this outfall to more accurately reflect its nature.

Response: The typographical mistake has been corrected to say "Lagoon 2." The Department disagrees that the presence of underground piping and manholes for the IWS collection system constitute industrial activity. Since the drainage area has been added to the permit, this comment does not affect the decision to add the outfall to the permit. This drainage area will contain industrial activity after the Snow Removal Vehicle Storage Building is constructed.

Comment: Outfall 012 (Engineering Yard) and Outfall 013 (Taxi Yard) discharge location description in the permit have been modified to state that the discharge is to the Green River, not Des Moines Creek and Miller Creek. In fact those outfalls discharge via City of SeaTac storm sewers to Gillian Creek, not Green River. It is important that the modified permit be corrected to show these discharge go to a local creek, not the Green River.

Response: The Department considers the receiving water for Outfalls 012 and 013 to be the City of SeaTac storm sewer. The cover page has been modified to indicate that Outfalls 012 and 013 discharge to the City of SeaTac storm sewer, which is tributary to Gillian Creek and the Green River

Comment: The requirement for testing of outfalls 014 and 015 should be quarterly through the life of this permit. I should also be requested that outfall 010 monitoring should be modified to occur quarterly, rather than annually, based on its history and design.

Response: Due to the expected issuance date of the modification, quarterly monitoring will be through the remainder of the permit term. The Department does not agree that the monitoring or Outfall 010 should be increased at this time.

Comment: It should be noted that Debbie North saw car washing occurring at the Doug Fox Travel Service Area after POS assured her it had stopped. This area still needs to be inspected occasionally.

Response: Car washing has not occurred at the Doug Fox Travel Service since the inspection in which Ms. North informed the facility that they could no longer wash cars. Inspections performed by the Department have confirmed this.