



Linda S. Adams
Agency Secretary

California Regional Water Quality Control Board

Central Coast Region



Arnold Schwarzenegger
Governor

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January 7, 2010

Richard N. Cote
Deputy Base Civil Engineer
Vandenberg Air Force Base
1172 Iceland Ave
Vandenberg AFB, CA 93437

Dear Mr. Cote:

WATER BOARD STAFF COMMENTS ON VANDENBERG AIR FORCE BASE DECEMBER 2009 DRAFT STORMWATER MANAGEMENT PROGRAM; WDID# 3 42MS05109

On December 11, 2009, the Central Coast Water Quality Control Board (Water Board) received Vandenberg Air Force Base's (AFB) Revised Draft Stormwater Management Program (SWMP). Water Board staff has reviewed the December 2009 draft SWMP and we are very pleased with the thorough response the AFB has provided regarding our previous comments. However, we have identified a few improvements that the AFB must make for us to recommend approval of the SWMP. We present the specific improvements that are needed in the attached Draft Table of Required Revisions. We require the AFB to make the modifications listed in the attached Draft Table of Required Revisions. Please respond with a revised SWMP addressing the Draft Table of Required Revisions prior to the Water Board's final review and consideration of public comment. Please include the WDID # provided above in all future correspondence regarding the AFB's SWMP.

The following sequence describes an optimal process for further review of the SWMP:

Water Board staff will:

1. Provide draft Table of Required Changes.
2. Post the draft Table of Required Changes on January 7, 2010 on the same webpage where the SWMP is posted for the 60-day public comment period. Water Board staff will announce the web posting, including web address, to all known interested persons by email.
3. At the close of the 60-day public comment period on March 7, 2010, Water Board staff will review comments received on the SWMP from the public, including comments from the AFB describing their changes to the SWMP. Changes from the AFB should be provided in a final revised SWMP for approval.
4. Water Board staff will prepare a final Table of Required Changes and a final recommendation on the adequacy of the SWMP. Staff will also prepare a response to comments received during the 60-day public comment period.
5. If Water Board staff recommends approval of the SWMP, the Water Board's Executive Officer may approve the AFB's SWMP and coverage under the General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (General Permit), contingent on the AFB making the required revisions to its SWMP by a date

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certain (generally within 60 days of the approval letter). The Executive Officer will post the approval letter with required revisions on the Water Board website.

- 6. Alternatively, if a member of the public or the AFB requests a Water Board hearing during the 60-day public comment period, Water Board staff will provide recommendations to the Water Board on the AFB's SWMP (with the required revisions) at the May 13, 2010 Water Board Meeting.

If you have questions regarding this matter, please contact **Phil Hammer** at (805) 549-3882, or phammer@waterboards.ca.gov.

Sincerely,



 Roger W. Briggs
Executive Officer

Attachment 1: Draft Table of Required Revisions

cc: (by electronic mail)

- | | |
|---|--|
| Tony Lucas, Vandenberg AFB | tony.lucas@vandenberg.af.mil |
| Tara Wiskowski, Vandenberg AFB | tara.wiskowski@vandenberg.af.mil |
| Kira Redmond, Santa Barbara Channelkeeper | kira@sbck.org |
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S:\Stormwater\Stormwater, Facilities\Santa Barbara Co\Municipal\Non-Traditional MS4s\Vandenberg Air Force Base\Draft Table of Req Chg to Vandenberg AFB Dec 09 SWMP_final.doc

ATTACHMENT 1
DRAFT TABLE OF REQUIRED REVISIONS
Vandenberg AFB Draft SWMP December 2009

Acronyms:

BMP	- Best Management Practice
MCM	- Minimum Control Measure
MG	- Measurable Goal
SWMP	- Storm Water Management Plan

Item Number	SWMP Section	Subject	Problem	Required Revisions
1	CS-3	Construction Oversight	<p>The BMP is difficult to follow to determine appropriate procedures. Staff realizes we previously stated, "The MCM may reference other sections of the SWMP that provide this information," but the current language is unclear.</p> <p>The BMP lacks appropriate response time to public inquiries.</p> <p>Table 5 MG 2 & 3 contain incorrect language.</p>	<p>When referencing procedures outside of the current MCM, restate the procedures in order to facilitate review. Revise the BMP to include public comment procedures defined in ID-8.</p> <p>Revise the BMP and MGs to state that Vandenburg will respond to all public inquiries and notifications regarding construction site activities within 24 hours, as stated in ID-8.</p> <p>Revise MG 2 in Table 5 to state, "Conduct oversight inspections twice a month during the rainy season..."</p> <p>Revise MG 3 to state, "respond to all public inquiries...within 24 hours."</p>
2	CS-4	Pollution Prevention Training	The BMP does not assure proper training.	Revise the BMP to require appropriate AFB staff and construction contractors to attend training.
3	PC-4	Training	The BMP narrative and MG 2 (pg. 76) do not match training time frame	Revise the BMP and MG 2 on page 76 to state, "design staff will be required to attend

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			requirements in Table 6 (pg. 86). MGs do not provide quantifiable targets for attendance.	one training session every other year." Revise MG 2 Table 6 to state, " <u>All design staff</u> are required to attend one training session every other year."
4	GH-2	Service Contract Provisions	The effectiveness of the BMPs in preventing stormwater pollution is unclear. It is the AFB's responsibility to make sure service contractors implement appropriate stormwater pollution prevention.	Revise MG 2 to clarify that during permit years 3-5 35 percent of service contracts with stormwater pollution prevention specifications will be audited annually, and that the audits will be conducted while the services are being performed.