

Sonoma County Fire Chiefs' Association

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October , 2008

Ms. Mona Dougherty
North Coast Regional Water Quality Control Board
5550 Skylane Blvd Ste A
Santa Rosa, CA 95403

RE: Order No. R1-2008-0106, NPDES No. CA00025054, Draft Stormwater Permit

Dear Ms. Dougherty:

On behalf of the Sonoma County Fire Chiefs Association, I am writing this letter to share with you our concerns regarding the Sonoma County NPDES Phase I, Term III Draft Storm Water Permit recently issued by your agency. These comments pertain to the proposed inclusion into Table 2 of a number of fire department related activities which if adopted, would compromise our ability to conduct emergency response, training and maintenance functions we feel are essential in maintaining public safety. In the order they appear in the draft permit they are:

Flows from Emergency Fire Fighting Activities: As found on page 37, flows from emergency firefighting and training activities shall comply with all conditions in the authorization:

Given the limited staffing faced by most fire agencies in Sonoma County, it would be difficult to implement this provision at a fire scene. Most fire agencies in the County rely on volunteers and are challenged to provide the staff needed to fight a fire. With the additional mandate to control potential run-off, fire personnel would be faced with a choice of conducting firefighting activities or implementing NPDES prevention measures which, from an emergency standpoint is not a viable option. Given the existing language, every fire we respond to could result in a violation subjecting the fire agency to punitive action, an action we find rather unsettling and extremely counterproductive.

It should be noted that a majority of departments make concerted efforts to control runoff whenever possible and most Firefighters are trained to the Hazardous Materials First Responder Level providing an enhanced awareness to initiate control measures when necessary. At times, this awareness has led fire personnel to even refrain from applying water to some fires due to the potential run-off. Furthermore, if a release from the site does occur, the Sonoma County Hazardous Materials Team is automatically dispatched to the scene which provides additional resources to control the run-off and results in OES (and subsequent Water Board) notification.

As applied to training activities this condition would also be detrimental as it would effectively eliminate all but a few locations where training could occur since in most instances grassy and less sensitive areas are not available. Flowing water is an integral component of a firefighter's training and the last place he or she should learn this activity is on the fire ground during a true emergency. The end result would be less experienced firefighters which would ultimately compromise the safety of the public. It should also be noted that with the water in a fire engine is typically stored for days and is aerated as the apparatus is driven and when discharged through a pump and nozzle, volatilizing much of the chlorine.

Fire Hydrant Testing: As found on page 38, testing of fire hydrants shall comply with all conditions in the authorization.

To subject all hydrants to this requirement represents a broad brush approach which fails to consider mitigating measures such as those hydrants that are not near storm drains and receiving waters or the effects of aeration when a diffuser is used. This "Fast-flushing" is done to clear the system (often domestic w/o back flow prevention) of rust gravel and to ensure that the fire hydrant is in an operable condition. If not completed, gravel may enter the fire engine and cause catastrophic damage to the pump resulting in the interruption of water during an interior attack – which would place firefighters at risk. It should be added that since "Fast Flushing" releases a relatively small amount of water (about 10 seconds of flow) and larger flow tests occur only when requested the net amount of water released is relatively small.

Discharge from Potable Sources: As found on page 38, discharges from potable sources shall also comply with all conditions in the authorization.

As presented in the draft permit, this provision would include fire sprinkler systems that would effectively make maintenance of fire sprinkler systems illegal without implementing the required BMP's. This can be problematic in that existing state law requires the owner of said systems to be maintained quarterly by opening of a test valve to flow enough water to verify the alarm operates. Whereas typically less than 18 gallons is used in this activity, the threat to receiving waters is minimal. However, with conflicting regulations, enforcement would be difficult and confusing for all parties.

Due the adverse impact the provisions of the authorization would have on our ability to conduct the critical components of our job we would formally request you provide exemptions for the above mentioned activities by incorporating the suggested language changes provided on the enclosed attachment "A". It is our strong belief that given the infrequency of these activities and the minimal amount of water discharged, there would be little or no threat to our watershed. Combined with the Hazardous Materials training & certifications most fire personnel possess as First Responders, Decontamination Specialists, Haz-Mat Scene Commanders as well as Haz-Mat Tec-Spec.'s, if a legitimate threat did arise, the expertise and resources to protect local waters would be available.

Your consideration in this matter is appreciated.

Sincerely,

John Zanzi,
President,

Enclosure: Attachment "A"

Attachment "A"
Recommended Language Changes Table 2

Table 2

Flows from emergency fire fighting activity	<ol style="list-style-type: none">1. Shall be exempt from the conditions in the authorization but BMP's shall be performed whenever possible.2. Pooled water after fire should be controlled (non-emergency repair or training flows are allowed unless it would cause <u>degradation to the nearest receiving waters</u>)	<ol style="list-style-type: none">1. Utilize the means necessary to allow settling out of pollutants before discharge to the storm drain whenever possible.2. Runoff controls shall be considered for fires at industrial or other facilities where hazardous materials may be onsite.
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<p>Fire Hydrant Testing</p>	<ol style="list-style-type: none">1. Shall comply with all the conditions in the authorization2. Fire hydrants that are not in close proximity to a storm drain inlet or receiving water can be tested without dechlorination.	<ol style="list-style-type: none">1. Must be dechlorinated using aeration and/or sodium thiosulfite and/or other appropriate means and/or be allowed to infiltrate to the ground.2. Utilize the means necessary to prevent discharge to the storm drain inlets to increase the distance and removal of chlorine by volatilization before discharge to the storm drain.
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<p>Discharge from potable water sources. *</p> <p>Exemptions:</p> <ol style="list-style-type: none">1. Releases necessary for fire suppression systems testing and maintenance.2. Firefighter training/drills	<ol style="list-style-type: none">1. Shall comply with all of the conditions in the authorization.2. Provide discharges from water lines and potable water sources shall be dechlorinated, pH adjusted if necessary, reoxygenated, and volumetrically and velocity controlled to prevent resuspension of sediments.3. Unless the MS4 is authorized by the Regional Water Board, planned discharges require separate NPDES permit coverage.	<ol style="list-style-type: none">1. Must be dechlorinated using aeration and/or sodium thiosulfite and/or other appropriate means and/or be allowed to infiltrate to the ground.2. Sediment removal in discharge through settling or filtration.3. Control flow rate of discharge to minimize erosion potential.4. BMP's such as sand bags or gravel bags shall be utilized to prevent erosion or sediment transport.5. All sediment shall be collected and disposed of in a legal and appropriate manner.
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* The term applies to incidental and infrequent releases that are innocuous from a water quality perspective. It does not cover scheduled discharges by potable water purveyors for the (i) dewatering or hydro-testing or flushing of water supply and distribution mains, or (ii) dewatering or draining of reservoirs or water storage facilities. Releases may occur for discharges from potable water sources only with the implementation of appropriate BMPs, dechlorination prior to discharge.

