

Comment Letters Received from Fire Departments

- El Segundo Fire Department
- Los Angeles Area Fire Chiefs Association



City of El Segundo

Fire Department

July 18, 2012

Elected Officials:

Carl Jacobson,
Mayor
Suzanne Fuentes,
Mayor Pro Tem
Bill Fisher,
Council Member
Dave Atkinson,
Council Member
Marie Felhauer,
Council Member
Tracy Weaver,
City Clerk
Chris Powell,
City Treasurer

Appointed Officials:

Greg Carpenter,
City Manager
Mark D. Hensley,
City Attorney

Department Directors:

Deborah Cullen,
Finance/Human
Resources
Kevin Smith,
Fire Chief
Debra Brighton,
Library Services
Sam Lee,
Planning and
Building Safety
Mitch Tavera,
Police Chief
Stephanie Katsouleas,
Public Works
Robert Cummings,
Recreation & Parks

www.elsegundo.org

Mr. Sam Unger, Executive Director
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

Subject: Public Comments for the Draft Municipal Separate Storm Sewer System (MS4) NPDES Permit

Dear Mr. Unger:

The City of El Segundo Fire Department appreciates the opportunity to comment on the Draft National Pollutant Discharge Elimination System (NPDES) Permit for Municipal Separate Storm Sewer System (MS4) Discharges within the Los Angeles County Flood Control District. The El Segundo Fire Department believes that this permit is a very positive development as it recognizes that Community Water Systems (CWSs) and Fire Departments (FDs) have legal obligation under both state and federal statute and regulation to discharge water for the protection of public health and safety. We support the regulatory accommodations provided in this permit which will allow CWSs, FDs, and MS4 Permittees to work together to resolve water quality problems rather than placing them a position where conflict would have resulted. The El Segundo Fire Department would like to offer the following comment:

Pages 31 and 32, Section III.A.4.a, sub-sections i, v and vi

Section III.A.2.a.i identified discharges from essential non-emergency firefighting activities must follow appropriate Best Management Practices (BMPs). The BMPs identified in the section include the CAL FIRE, Office of the State Fire Marshal's "Water-Based Fire Protection Systems Discharge Best Management Practices Manual" and Riverside County's "Best Management Practices Plan for Urban Runoff Management". We believe these manuals should be identified in a table consistent with Table 8, titled "Required Conditions for Essential Conditionally Exempt Non-Stormwater Discharges". A copy of the draft table is attached to this letter.

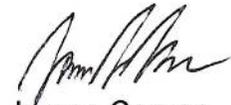
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CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

With the use of this table, the applicable BMP manual references in Section III.A.4.a, sub-sections I, v and vi could be reference to this table, clarifying the BMP requirements. The revised text could read:

- i. Notifies the Permittee of the planned discharge in advance, consistent with requirements in Table 8 or ~~recommendations pursuant to the applicable BMP manual~~ Table X:
- v. Implements BMPs and/or control measures as specified in Table 8 or ~~in the applicable BMP manual(s)~~ Table X as a condition of the approval to discharge into the Permittee's MS4: and
- vi. Maintains records of its discharge to the MS4, consistent with requirements in Table 8 or ~~recommendations pursuant to the applicable BMP manual~~ Table X.

Thank you for your attention with this matter.

Sincerely,



James Carver
Fire Marshal

Table X. Required Conditions for Essential Conditionally Exempt Non-Storm Water Discharges

Discharge Category	General Conditions Under Which Discharge Through the MS4 is Allowed	Conditions/BMPs that are Required to be Implemented Prior to Discharge Through the MS4
All Discharge Categories	See discharge specific conditions below	Ensure flow path between discharge point and entrance to the MS4 (e.g. streets, gutters, swales) are free of trash and debris, organic matter, and potential sources of pollutants. Whenever there is a discharge of one acre-foot or more into the MS4, the MS4 Permittee shall require advance notification by the discharger to the MS4 Permittee
Non-emergency fire fighting activities Installation, testing, and maintenance of water-based fire suppression systems Potable Water Sources not otherwise covered by an individual or general NPDES Permit		Management Practices Plan for Urban Runoff Management (May 1, 2004) or equivalent BMP manual for fire training activities and post-emergency fire fighting activities CAL FIRE, Office of the State Fire Marshal's Water-Based Fire Protection Systems Discharge Best Management Practices Manual (September 2011) For Discharges greater than one acre-foot Use of American Water Works Association (California-Nevada Section) Guidelines for the Development of Your Best Management Practices (BMP) Manual for Drinking Water System Releases (2005) or equivalent industry standard BMP manual. Notification of MS4 Permittee at least 72 hours prior to a planned discharge and as soon as possible after an unplanned discharge Monitoring of any pollutants of concern in the potable water supply release Record keeping by the potable water supplier

Los Angeles Area



Fire Chiefs Association

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CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

July 20, 2012

Mr. Sam Unger, Executive Director
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

**Subject: Public Comments for the Draft Municipal Separate Storm Sewer System (MS4)
NPDES Permit**

Dear Mr. Unger:

The Los Angeles Area Fire Chiefs' Association (LAAFCA) appreciates the opportunity to comment on the Draft National Pollutant Discharge Elimination System (NPDES) Permit for Municipal Separate Storm Sewer System (MS4) Discharges within the Los Angeles County Flood Control District. Representing the 31 independent Fire Departments and Fire Districts throughout Los Angeles County, the LAAFCA believes that this permit is a very positive development as it recognizes that Community Water Systems (CWSs) and Fire Departments (FDs) have legal obligation under both state and federal statute and regulation to discharge water for the protection of public health and safety. We support the regulatory accommodations provided in this permit which will allow CWSs, FDs, and MS4 Permittees to work together to resolve water quality problems rather than placing them in a position where conflict would have resulted. LAAFCA would like to offer the following comment:

Pages 31 and 32, Section III.A.4.a, sub-sections i, v and vi

Section III.A.2.a.i identified discharges from essential non-emergency firefighting activities must follow appropriate Best Management Practices (BMPs). The BMPs identified in the section include the CAL FIRE, Office of the State Fire Marshal's "Water-Based Fire Protection Systems Discharge Best Management Practices Manual" and Riverside County's "Best Management Practices Plan for Urban Runoff Management". We believe these manuals should be identified in a table consistent with Table 8, titled "Required Conditions for Essential Conditionally Exempt Non-Stormwater Discharges". A copy of the draft table is attached to this letter.

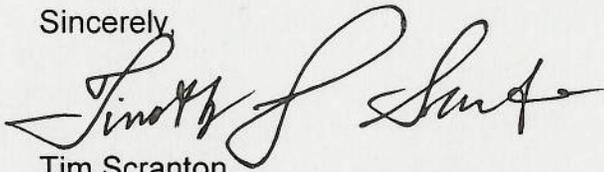
Mr. Sam Unger, Executive Director, L. A. Regional Water Quality Control Board
Public Comments for the Draft Municipal Separate Storm
Sewer System (MS4) NPDES Permit
Page 2

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- vi. Maintains records of its discharge to the MS4, consistent with requirements in Table 8 or ~~recommendations pursuant to the applicable BMP manual~~ Table X.

Thank you for your attention with this matter.

Sincerely,



Tim Scranton
Fire Chief, Beverly Hills Fire Department
President, Los Angeles Area Fire Chiefs' Association

Table X. Required Conditions for Essential Conditionally Exempt Non-Storm Water Discharges

Discharge Category	General Conditions Under Which Discharge Through the MS4 is Allowed	Conditions/BMPs that are Required to be Implemented Prior to Discharge Through the MS4
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Non-emergency fire fighting activities		Management Practices Plan for Urban Runoff Management (May 1, 2004) or equivalent BMP manual for fire training activities and post-emergency fire fighting activities
Installation, testing, and maintenance of water-based fire suppression systems		CAL FIRE, Office of the State Fire Marshal's Water-Based Fire Protection Systems Discharge Best Management Practices Manual (September 2011)
Potable Water Sources not otherwise covered by an individual or general NPDES permit		For Discharges greater than one acre-foot Use of American Water Works Association (California-Nevada Section) Guidelines for the Development of Your Best Management Practices (BMP) Manual for Drinking Water System Releases (2005) or equivalent industry standard BMP manual.
		Notification of MS4 Permittee at least 72 hours prior to a planned discharge and as soon as possible after an unplanned discharge
		Monitoring of any pollutants of concern in the potable water supply release Record keeping by the potable water supplier