Comment Letters Received from Fire Departments

- El Segundo Fire Department
- Los Angeles Area Fire Chiefs Association
July 18, 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 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 in 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.
With the use of this table, the applicable BMP manual references in Section III.A.4.a, subsections 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,

[Signature]

James Carver
Fire Marshal
<table>
<thead>
<tr>
<th>Discharge Category</th>
<th>General Conditions Under Which Discharge Through the MS4 is Allowed</th>
<th>Conditions/BMPs that are Required to be Implemented Prior to Discharge Through the MS4</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Discharge Categories</td>
<td>See discharge specific conditions below</td>
<td>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.</td>
</tr>
<tr>
<td>Non-emergency fire fighting activities</td>
<td></td>
<td>Management Practices Plan for Urban Runoff Management (May 1, 2004) or equivalent BMP manual for fire training activities and post-emergency fire fighting activities.</td>
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<tr>
<td>Installation, testing, and maintenance of water-based fire suppression systems</td>
<td></td>
<td>CAL FIRE, Office of the State Fire Marshal’s Water-Based Fire Protection Systems Discharge Best Management Practices Manual (September 2011)</td>
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<td>Notification of MS4 Permittee at least 72 hours prior to a planned discharge and as soon as possible after an unplanned discharge.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Monitoring of any pollutants of concern in the potable water supply release.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Record keeping by the potable water supplier.</td>
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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.
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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,

Tim Scantlebury
Fire Chief, Beverly Hills Fire Department
President, Los Angeles Area Fire Chiefs’ Association
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<td>Potable Water Sources not otherwise covered by an individual or general MFDES Permit</td>
<td>For discharges greater than one acre-foot</td>
<td>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 (2002) 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</td>
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