

# Oulwa Research Studio

## Questions

When can we expect a response and determination by the Department of Ecology for final comment ?

In conclusion, Oulwa Research Group supports the activity and efforts by the Department and appreciates the opportunity to provide these comments. We look forward to working cooperatively with the Washington State Department of Ecology and other stakeholders to support pollution prevention efforts.

Octavia Parker, Director  
Oulwa Research Studio

# Identification. # **WAS026638**

**Project Title:** Joint Base Lewis-McChord MS4 (**Permit # WAS026638**).

**Year:** March 20, 2023 1:00 P.M. EST

**Site Conditions:** Living - Discussion

**Company:** Oulwa Research Studio

**Public Notice Date:** February 28, 2023 12:00AM PT **Comment Period Ends:** March 20, 2023 11:59PM PT.

## **Background**

JBLM was established in 2010, and is cooperatively operated by the Army and the Air Force. The joint base is located in Pierce and Thurston Counties and comprises approximately 86,176 acres of the former Fort Lewis Army Base, and 4,639 acres of the former McChord Air Force Base (Figure 1). Total land area of JBLM is approximately 90,815 acres or 142 square miles. The Joint Base operates JBLM on behalf of warfighting units, families, and extended military community who rely on JBLM for support. With an Army joint base commander and Air Force deputy joint base commander, the installation is supported through directorates and agencies that provide a full range of city services and quality of life functions, including facility maintenance, recreation, family programs, training support and emergency services. The population of JBLM in Pierce and Thurston Counties in 2017 was estimated to be 95,000, which includes military personnel, military dependents residing on base, civilian employees, contractors, and visitors. Most development is located in what is referred to as the "cantonment" areas. Those portions of the installation designated as training areas have limited development, and are reserved exclusively for military training operations.

This Stormwater Management Plan (SWMP) describes the procedures that Joint Base Lewis-McChord (JBLM) will implement to comply with the requirements with United States Environmental Protection Agency (EPA) National Pollutant Discharge and Elimination System (NPDES) permit number WAS-026638. NPDES MS4 WAS-026638 was issued to the JBLM on 22 August 2013, with a scheduled effective date of 1 October 2013. On 19 September 2013, and 22 October 2013, the Army filed two Motions for Extension of Time to File Petition for Review. The Environmental Appeals Board ("EAB") granted both extension requests. On 5 November 2013, the Army filed a Petition for Review of the Permit by the EAB. The Army sought review of the stormwater management program requirements in Parts II.B.5 and II.C of the Permit, as well as various compliance deadlines elsewhere in Permit Parts II and IV. On 22 November 2013, EPA notified JBLM that the contested conditions in Parts II.B.5, II.C and specified deadlines were stayed until final agency action under 40 CFR § 124.19(f); the remaining conditions of the Permit are severable from the contested provisions and therefore became fully effective and enforceable on 25 December 2013. The conditions became effective on 1 February 2015.

**Permit Area.** This permit covers all geographic areas of the military installation located within Pierce and Thurston Counties, Washington, which are owned or operated by the Joint Base Lewis-McChord (JBLM). The Permit Area includes but is not limited to the cantonment areas (comprised of and referred to as JBLM Main, JBLM-North, and/or JBLM-McChord Field) and all military training areas.

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The objective for technical data is to collect environmental monitoring data of known, acceptable, and documentable quality. The objectives established for the project are:

Implement the procedures outlined herein for field sampling, sample custody, equipment operation and calibration, laboratory analysis, and data reporting that will facilitate consistency and thoroughness of data generated.

Achieve the acceptable level of confidence and quality required so that data generated are scientifically valid and of known and documented quality. This will be performed by establishing criteria for precision, accuracy, representativeness, completeness, and comparability, and by testing data against these criteria.

**Waste Stream**, Management of the solid and liquid waste streams in accordance with RCRA, Clean Air and Water Acts, and federal, state, and local standards is critical to protection of the environment. State or local governments often require that research and development facilities secure separate permits or certifications for discharge of their liquid and solid wastes.

### **Safety.**

**Water Assessment.** As water travels over the surface of the land or through the ground, it dissolves naturally occurring minerals and, in some cases, radioactive material, and can pick up substances resulting from the presence of animals or from human activity.

*Microbial contaminants*, such as viruses and bacteria, which may come from sewage treatment plants, septic systems, livestock operations and wildlife.

*Inorganic contaminants*, such as salts and metals, which can be naturally- occurring or result from urban storm water runoff, industrial or domestic wastewater discharges, oil and gas production, mining or farming.

*Pesticides and herbicides*, which may come from a variety of sources such as storm water run-off, agriculture, and residential users.

*Radioactive contaminants*, which can be naturally occurring or the result of mining activity.

*Organic contaminants*, including synthetic and volatile organic chemicals, which are by-products of industrial processes and petroleum production, and also come from gas stations, urban storm water run-off, and septic systems.

**Maximum Contaminant Level Goal (MCLG):** the “Goal” is the level of a contaminant in drinking water below which there is no known or expected risk to human health. MCLGs allow for a margin of safety.

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**Maximum Contaminant Level (MCL):** the “Maximum Allowed” MCL is the highest level of a contaminant that is allowed in drinking water. MCLs are set as close to the MCLGs as feasible using the best available treatment technology.

**Secondary Maximum Contaminant Level (SMCL):** recommended level for a contaminant that is not regulated and has no MCL.

**Action Level (AL):** the concentration of a contaminant that, if exceeded, triggers treatment or other requirements.

**Treatment Technique (TT):** a required process intended to reduce levels of a contaminant in drinking water.

**Maximum Residual Disinfectant Level (MRDL):** the highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.

**Non-Detects (ND):** lab analysis indicates that the contaminant is not present.

**Monitoring Period Average (MPA):** An average of sample results obtained during a defined time frame, common examples of monitoring periods are monthly, quarterly and yearly.

**Nephelometric Turbidity Unit (NTU):** a measure of the clarity of water. Turbidity in excess of 5 NTU is just noticeable to the average person. Turbidity is not regulated for groundwater systems.

**Running Annual Average (RAA):** an average of sample results obtained over the most current 12 months and used to determine compliance with MCLs.

**Locational Running Annual Average (LRAA):** Average of sample analytical results for samples taken at a particular monitoring location during the previous four calendar quarters.

**Monitoring and Reporting (M/R):** a violation for failure to conduct regular monitoring of drinking water quality or to submit monitoring results in a timely fashion.

**Operational Evaluation Level (OEL):** a report triggered by the disinfection by the products rule. If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. Your water system is responsible for providing high quality drinking water, but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking.

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If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at <http://www.epa.gov/safewater/lead>.

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In conclusion, Oulwa Research Group supports the activity and efforts by the Department and appreciates the opportunity to provide these comments. We look forward to working cooperatively with the Washington State Department of Ecology and other stakeholders to support pollution prevention efforts.



Signed,

**Year: March 20, 2023 1:00 P.M. EST**

**Octavia Parker,**

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