



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND
WATERSHEDS

Captain Pete M. Dawson
Commanding Officer
Naval Base Kitsap Bangor
120 S. Dewey Street
Bremerton, Washington 98314-5020

July 27, 2011

Re: Additional Benchmark Monitoring Requirements for Naval Base Kitsap Bangor (NBKB) under the National Pollutant Discharge Elimination System Multi-Sector General Permit (NPDES MSGP), Permit Number WAR05BA4F

Dear Commander Dawson:

This letter is to provide you the final additional benchmark monitoring requirements necessary for the NBKB to obtain permit coverage under the U.S. Environmental Protection Agency's 2008 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP). Attachment A includes the final additional benchmark monitoring requirements.

On July 29, 2009, DeeAnn Kirkpatrick of the National Oceanic and Atmospheric Administration (NOAA) requested that the EPA put a hold on the NBKB request for permit coverage under the NPDES MSGP. Pursuant to Part 1.1.4.5 of the MSGP, authorization to discharge under the permit is only allowed for stormwater discharges that will not adversely affect federally-listed species under the Endangered Species Act (ESA). NOAA requested the hold because of concerns regarding stormwater runoff that contains copper and zinc.

EPA agrees with NOAA's concerns regarding the potential for copper and zinc to be found in stormwater runoff from the NBKB and the potential for resulting in adverse effects to aquatic species, including those that are listed as endangered or threatened under the ESA. In order for stormwater discharges from NBKB to be eligible for coverage under the MSGP, EPA is using its discretion to establish additional benchmark monitoring requirements for copper and zinc at NBKB, as detailed in Appendix A of this letter. EPA is adding these requirements consistent with Part 2.2.1 (*Water Quality Standards*) and Part 6.2.5 (*Additional Monitoring Required by the Director*) of the MSGP. Additionally, EPA has coordinated with NOAA to identify additional reporting requirements that would be sufficient to resolve NOAA's concerns, leading to NOAA's agreement that NBKB meets the eligibility requirement of Part 1.1.4.5 of the MSGP, and that the "hold" on the NBKB NOI can be removed.

Finally, EPA confirms that benchmarks of the MSGP are not numeric effluent limits, as explained in Part 6.2.1 of the MSGP. Benchmarks are indicators. Benchmarks are intended to be used as an adaptive management mechanism for the facility operator to revise the Storm Water Pollution Prevention Plan, and to assist in adopting additional control measures when benchmarks are exceeded, so that the narrative effluent limits identified in Part 2 of the MSGP can be met. The MSGP clearly states that a benchmark exceedance is not necessarily a permit violation. In general, when a facility's

monitoring data exceeds the benchmark levels, the facility can be in full compliance with the permit as long as it follows all the corrective action and subsequent reporting steps.

Based on the issuance of this letter with the additional requirements outlined in the enclosed Appendix A, NOAA agrees to remove the hold on NBKB's NOI for coverage under EPA's MSGP. NBKB has 30 days, after the receipt of this letter, to provide EPA with any comments regarding these additional monitoring requirements. If, within 30 days from receipt of this letter, EPA does not receive comments from NBKB, these additional monitoring requirements will become enforceable provisions of the MSGP for NBKB.

If you have any questions or comments regarding this letter, please feel free to call me at (206) 553-4198, or you may contact Michael Le at (206) 553-1099, or John Palmer at (206) 553-6521.

Sincerely,

A handwritten signature in black ink, appearing to read "M. A. Bussell". The signature is fluid and cursive, with a small "for" written at the end.

Michael A. Bussell
Director
Office of Water and Watersheds

cc: Ms. DeeAnn Kirkpatrick, NOAA
Ms. Carol MacKenzie, ACOS
Mr. Bryan Haelsig, NAVFAC NW

APPENDIX A

ADDITIONAL BENCHMARK MONITORING REQUIREMENTS

Parameter	Benchmark Value (marine water)	Monitoring Location
Copper (Cu)	14 µg/L	OF3A
Zinc (Zn)	117 µg/L	OF3A

Parameter	Benchmark Value (fresh water)	Monitoring Location
Copper (Cu)	5.6 µg/L	OF2
Zinc (Zn)	50 µg/L	OF2

Monitoring Schedule: Monthly: Samples must be taken for a measurable storm event that follows a preceding storm event by at least a 24-hour dry period. Samples must be collected within the first 30 minutes of a measurable storm event. If it is not possible to collect the sample within the first 30 minutes of a measurable storm event, the sample must be collected as soon as practicable after the first 30 minutes and documentation must be kept with the SWPPP explaining why it was not possible to take samples within the first 30 minutes of a measurable storm event. The first monthly sample shall be no later than August, 2011.

Sample Type: Grab

Benchmark comparison: Monthly samples shall be averaged by the actual number of qualifying samples taken to determine a quarterly value. The quarterly value shall be used to determine if the benchmark is met or exceeded.

Data not exceeding copper or zinc benchmark: If four consecutive quarterly (not counting any quarter in which measurements were not taken due to lack of precipitation and runoff) values do not exceed the benchmark, this monitoring requirement is fulfilled.

Data exceeding copper or zinc benchmark: If a quarterly value exceeds the benchmark, the facility shall follow the procedures specified in Part 6.2.1.2, including the corrective action steps in Part 3.

Reporting Requirements: Monitoring data and reports shall be provided to EPA and NOAA in accordance to Part 7. Additionally, copies of monthly data and reports must be submitted to the NOAA and EPA regional offices.

DeeAnn Kirkpatrick
National Marine Fisheries Service
7600 Sand Point Way N.E., Building 1
Seattle, Washington 98115

MSGP Coordinator
U.S. EPA, Region 10, OWW-130
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140