



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
WATER AND
WATERSHEDS

JUL 27 2011

Captain Gregory Jay Johnston
Commanding Officer
Naval Air Station Whidbey Island
3740 N Charles Porter Avenue, Building 385
Oak Harbor, Washington 98278

Re: Additional Benchmark Monitoring Requirements for Naval Air Station Whidbey Island NASWI) under the National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP), Permit Number WAR05B91F

Dear Commander Johnston:

This letter is to provide you the final additional benchmark monitoring requirements necessary for NASWI to obtain permit coverage under the U.S. Environmental Protection Agency's 2008 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 NASWI's 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 NASWI 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 NASWI to be eligible for coverage under the MSGP, EPA is using its discretion to establish additional benchmark monitoring requirements for copper and zinc at NASWI, 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 NASWI meets the eligibility requirement of Part 1.1.4.5 of the MSGP, and that the "hold" on NASWI can be removed.

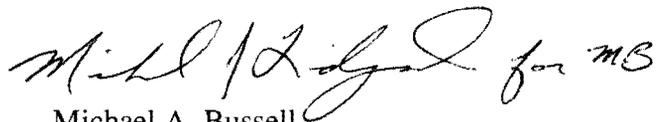
Finally, EPA confirms that benchmarks of the MSGP are not numeric effluent limits, as explained in Part 6.2.1 of the MSGP. Benchmarks are indicators. Benchmarks are intended to be used as an adaptive management mechanism for the facility operator to revise the Storm Water Pollution Prevention Plan, and 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 NASWI's NOI for coverage under the EPA's MSGP. NASWI 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, the EPA does not receive comments from NASWI, these additional monitoring requirements will become enforceable provisions of the MSGP for NASWI.

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,



Michael A. Bussell
Director
Office of Water and Watersheds

Enclosure: Attachment A

cc: Ms. DeeAnn Kirkpatrick, NOAA
Mr. Calvin Canton, CIV NAVFAC NW
Mr. Bryan Haelsig, NAVFAC NW

APPENDIX A

ADDITIONAL BENCHMARK MONITORING REQUIREMENTS

Parameter	Benchmark Value (marine waters)	Monitoring Locations
Copper (Cu)	14 µg/L	OAF-4A, OSB-3D
Zinc (Zn)	117 µg/L	OAF-4A, OSB-3D

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, 2010.

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. Also, copies of data and report must be sent to local NOAA and EPA regional offices as follow:

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
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Seattle, Washington 98101-3140