



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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Seattle, WA 98101-3140

OCT 7 2009

OFFICE OF
WATER AND WATERSHEDS

Michael Le
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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Commander Daniel Limberg
Naval Station Everett
2000 W Marine View Drive
Everett, Washington 98207-5001

RE: Additional Monitoring for Naval Station Everett under the
NPDES Multi-Sector General Permit, Permit Number WAR05B92F

Dear Commander Limberg:

On June 30, 2009, DeeAnn Kirkpatrick of the National Oceanic and Atmospheric Administration (NOAA) requested the U.S. Environmental Protection Agency (EPA) to hold the Naval Station Everett's request for permit coverage pursuant to Part 1.1.4.5 of the National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Associated with Industrial Activity (MSGP).

NOAA requested that Naval Station Everett provide additional information supporting its determination that the permitted activities are not likely to adversely affect (NLAA) any federally-listed endangered and/or threatened species or designated critical habitat. Specifically, NOAA requested that Naval Station Everett provide documentation supporting its eligibility as set forth in Part 1.1.4.5 of the MSGP. On July 14, 2009, Naval Station Everett provided NOAA and EPA with an electronic copy of its storm water pollution prevention plan (SWPPP). On July 29, 2009, NOAA requested that EPA require Naval Station Everett to conduct additional storm water discharge monitoring for copper as part of EPA's authorization of Naval Station Everett under the MSGP.

A variety of copper sources are expected to be found at Naval Station Everett which are associated with urban industrial land uses, such as scrap recycling, diesel and gasoline fuel combustion, and marine antifouling coatings.¹ In addition, Naval Station Everett's storm water discharge monitoring data between 1998 and 2004 show exceedances of the zinc benchmark at all three outfalls during this period. In an email message to EPA, NOAA stated that it considers it "likely that copper would be present where zinc is present." According to NOAA, listed salmon species are adversely affected by low levels of dissolved copper.

EPA agrees with NOAA's concerns regarding copper discharges into the Puget Sound and its potential adverse effects to aquatic species, including those that are listed as endangered

¹ TDC Environmental LLC 2004. Copper Sources in Urban Runoff and Shoreline Activities. Information Update prepared for the Clean Estuary Partnership. 72 pgs.

or threatened under the Endangered Species Act. EPA, therefore, is imposing the following additional benchmark monitoring requirements pursuant to Part 6.2.5 of the MSGP:

Industrial Activity	Parameter	Benchmark Value
Sector N, P, Q	Copper (Cu)	0.0068 mg/L1
1. Based on EPA 304(a) salt water acute criteria with a 0.7 translator value to convert from dissolved copper to total copper.		

Monitoring Locations: Outfalls A, B, and C

Monitoring Schedule: Monthly: in accordance with sampling conditions as specified in Part 6.1.3 and 6.1.4 of the MSGP. The first monthly sample shall be no later than January, 2010.

Sample Type: Composite

Benchmark comparison: Monthly samples shall be averaged by the actual number of qualifying samples taken to determine a quarterly value. In accordance with Part 6.2.1.2, four quarterly values shall be averaged to determine if the benchmark is met or exceeded.

Data not exceeding copper benchmark: In accordance with Part 6.2.1.2, if the average of the first 4 quarterly values does not exceed the benchmark, this monitoring requirement is fulfilled.

Date exceeding copper benchmark: If the average of the first 4 quarterly values exceeds the benchmark or after it is mathematically certain the 4 quarterly values will exceed the benchmark, the facility shall follow the procedures specified in Part 6.2.1.2, including the corrective action steps in Part 3.

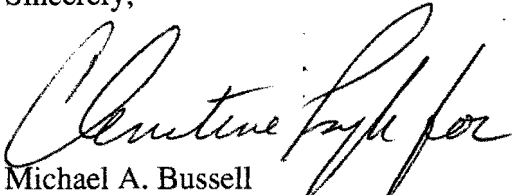
Reporting Requirements: Monitoring data and reports shall be provided to EPA and NOAA in accordance to Part 7.

DeeAnn Kirkpatrick
National Marine Fisheries Service
7600 Sand Point Way NE, Bldg 1
Seattle, WA 98115

Naval Station Everett 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 Naval Station Everett, these additional monitoring requirements will become enforceable provisions of the MSGP for Naval Station Everett.

If you have any questions or comments regarding this letter, please contact Michael Le of my staff at (206) 553-1099.

Sincerely,


Michael A. Bussell
Director, Office of Water and Watersheds

cc: Ms. DeeAnn Kirkpatrick, NOAA
Mr. Steve Murphy, NAVSTA