

# **Stormwater Pollution Prevention Plan**



**Naval Magazine Indian Island,  
Washington**

**May 2021**

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# **Stormwater Pollution Prevention Plan**



## **Naval Magazine Indian Island, Washington**

**May 2021**

**Prepared by:**



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## **Prepared By:**

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Christopher A Jorgensen  
Environmental Engineer  
NAVFAC Northwest

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Date

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## **Plan Certification**

**I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.**

---

D. W. EMERSON

Commander, U.S. Navy  
Commanding Officer,  
Naval Magazine Indian Island

Naval Magazine Indian Island  
100 Indian Island Road  
Port Hadlock, WA 98339-9723

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Date

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## Record of Review and Amendments

All reviews and amendments to this plan shall be summarized here. The NAVMAG Indian Island Environmental Division is responsible for maintaining the definitive copy of this plan.

Date	Revision Number	Section(s)	Reason for Change	Revised By
May 2021	Original	All	2021 MSGP	Chris Jorgensen

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## List of Acronyms

BMP	Best Management Practice
BOD	Biochemical Oxygen Demand
BOSC	Base Operations Support
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CoC	Chain of Custody
COD	Chemical Oxygen Demand
CSCE	Comprehensive Site Compliance Evaluation
CWA	Clean Water Act
DMR	Discharge Monitoring Report
DRMO	Defense Reutilization and Marketing Office
EPA	Environmental Protection Agency
EPR	Environmental Project Requirements
ESA	Endangered Species Act
FEAD	Facilities Engineering and Acquisition Act
GPS	Global Positioning System
HDPE	high-density polyethylene
ICP	Integrated Contingency Plan
ICRMP	Integrated Cultural Resources Management Plan
INRMP	Integrated Natural Resources Management Plan
MSGP	Multi-Sector General Permit
NAVBASE	Naval Base
NAVFAC	Naval Facilities Engineering Command

NAVMAG	Naval Magazine
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRC	National Response Center
OHS	Oil and Hazardous Substances
OPA	Oil Pollution Act
POL	Petroleum Oils and Lubricants
SARA	Superfund Amendments and Reauthorization Act
SOP	Standard Operating Procedure
SPCC	Spill Prevention, Control, and Countermeasure
SWPPP	Stormwater Pollution Prevention Plan
T&E	Threatened and Endangered
TMDL	Total Maximum Daily Load
USFWS	U.S. Fish and Wildlife Service
WDFW	Washington Department of Fish and Wildlife
WDOE	Washington State Department of Ecology
WQA	Water Quality Assessment
WQS	Water Quality Standards
WRIA	Water Resource Inventory Area

# **1 Introduction and Overview**

## **1.1 Regulatory Background**

On November 16, 1990, the Environmental Protection Agency (EPA) established regulations to control the amount of pollutants that accumulate in stormwater and discharge into waters of the United States. Facilities that discharge stormwater associated with industrial activity into waters of the United States must comply with 40 CFR 122.26 and obtain a National Pollutant Discharge Elimination System (NPDES) Permit. The EPA regulates federal facilities in Washington State for NPDES permits, so Naval Magazine (NAVMAG) Indian Island follows the guidance documents and permits issued by EPA Region 10.

NAVMAG Indian Island chose to obtain permit coverage through application of the EPA issued Multi-Sector General Permit that was published on 30 October 2000 (2000 MSGP). This permit expired on October 30, 2005. Since NAVMAG Indian Island was a discharger previously covered by the 2000 MSGP, the facility has submitted NOIs and obtained coverage under subsequent 2005, 2008 and 2015 reissues of the MSGP. In May of 2021 NAVMAG Indian Island submitted the most recent NOI for coverage under the current 2021 MSGP.

The 2021 MSGP is a broad based pre-published permit that spells out actions necessary to achieve compliance. The permit specifies 29 industrial types of facilities (called sectors) that trigger the requirement for permit coverage. A facility can obtain permit coverage through the 2021 MSGP if they conduct one or more of the industrial sectors specified in the 2021 MSGP. NAVMAG Indian Island conducts the following sectors:

- Sector P: Land Transportation and Warehousing
- Sector Q: Water Transportation

The primary requirement of complying with the 2021 MSGP is to develop/update and implement a SWPPP that follows the requirements given in the 2021 MSGP, covering industrial facilities at Sectors P and Q. The SWPPP update written per the 2021 MSGP was completed May 2021.

NAVMAG Indian Island must retain copies of the SWPPP, including any modifications to the SWPPP and all reports, certifications, monitoring data, and records of inspections for 3 years after the date that the 2021 MSGP expires.

### **1.1.1 Federal Stormwater Regulations**

The 1972 amendments to the Federal Water Pollution Control Act [referred to as the Clean Water Act (CWA)] stipulated that the discharge of any pollutant to surface waters without a NPDES permit was unlawful. Between 1972 and 1987, national efforts to improve water quality focused on reducing pollutants of industrial process wastewater and municipal sewage. The reauthorization of the CWA in 1987 with the passage of the Water Quality Act (WQA), established a framework for regulating municipal and industrial stormwater discharges under the NPDES permit program. Final federal regulations regarding the EPA's NPDES stormwater permit program were published in the Federal Register on November 16, 1990.

Stormwater discharges associated with industrial activity have been divided into two categories: those associated with industrial activity except construction activity and those associated with industrial activity from construction activity. Permit options available for industrial activities excluding construction activity are described below.

### 1.1.2 Permit Application Options for Non-Construction Industrial Activity

The stormwater regulation allows two permit application options for stormwater discharges associated with industrial activity except construction activity. These include an application for an individual NPDES stormwater permit and a NOI to comply with a general permit, including the Multi-Sector general permit. Each of these application options is discussed briefly in the following paragraphs.

Individual NPDES stormwater permits are issued to a specific facility for stormwater discharges related to industrial activity. In most instances, the permit is tailored to meet the discharge characteristics of the facility and/or special requirements of the receiving waters. Individual NPDES stormwater permits are issued by states that have been delegated NPDES permitting authority or by the EPA in states that do not have this authority.

The Multi-Sector general permit for industrial activities is the result of the group permitting process initiated by EPA in the late 1980s. The permit was originally issued until September 29, 1995. EPA reissued the permit in 2000, 2008, 2015 and most recently in March 2021.

### 1.1.3 Navy Stormwater Policy

Requirements and policies regarding stormwater discharges for Navy facilities are stipulated in the Department of the Navy's Environmental and Natural Resources Program Manual, Office of the Chief of Naval Operations Instruction (OPNAVINST) 5090.1D (U.S. Navy 2014). These requirements, which are a part of the Clean Water Ashore Program, state that Navy facilities must comply with all substantive and procedural requirements applicable to point and non-point sources of pollution as required by Executive Order 12088 and the CWA. Navy policy regarding point-source stormwater discharges from Navy facilities is for these discharges to meet all applicable federal, state, or local requirements, including control requirements for toxic and non-conventional pollutants. The Navy's policy on stormwater management and non-point pollution-source control requires commands to ensure that all activities comply with stormwater management and pollution prevention requirements, as stipulated in permits under which the activity is covered.

Further, Navy facilities must comply with all requirements of federal, state, interstate, and local laws and regulations respecting the control and abatement of water pollution in the same manner and to the same extent as any non-governmental entity. Navy policy also states that the discharge of any pollutant that does not comply with effluent standards or other procedural requirements is unlawful.

### 1.1.4 Industrial Stormwater Compliance Strategy at NAVMAG Indian Island

The state of Washington is an NPDES-delegated state with general permitting authority. However, permitting for federal facilities in the state of Washington was retained by the EPA. Federal facilities in Washington are eligible for coverage under an individual NPDES permit or the MSGP. Administration of these permits is by EPA, Region 10, Water Management Division (WD-134), Stormwater Staff located at the Seattle, Washington office.

NAVMAG Indian Island is covering stormwater discharges from industrial activities under the MSGP. Coverage for the current permit term was granted by EPA beginning on 30 September 2017 under permit tracking number WAR05F002. An NOI will also be submitted

to obtain coverage under the reissued 2021 MSGP. Copies of the NOI form are provided in Appendix C.

In order to comply with the construction general permit, an NOI must also be submitted for all construction activities at NAVMAG Indian Island that will disturb more than one acre of land. Compliance with that permit requires the development of a site-specific stormwater management plan not related to this SWPPP document. Please refer to the EPA Construction General Permit for additional guidance and requirements. A summary of Best Management Practices applicable to the stormwater management requirements of the construction general permit is provided in Section 4.

### 1.1.5 Permit Eligibility Determination

The 2021 MSGP requires that stormwater discharges, allowable non-stormwater discharges, and discharge related activities are protective of endangered species, critical habitat, and historic properties. Documentation of permit eligibility with respect to protection of endangered species, critical habitat, and historic properties is contained in Appendix C.

## 1.2 Purpose and Scope of the SWPPP

NAVMAG Indian Island has developed the SWPPP to:

- Identify potential sources of pollution that may reasonably be expected to affect the quality of stormwater discharges.
- Describe and ensure the implementation of practices to reduce the pollutants in stormwater.
- Comply with the terms and conditions of the United States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination Systems (NPDES) Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity (2021 MSGP).
- Present stormwater control measures, schedules of activities, prohibitions of practices, maintenance procedures, and other best management practices to prevent or reduce the pollution in runoff from industrial sites.

## 1.3 Document Organization

This NAVMAG Indian Island SWPPP is organized to present the information required in Part 6 of the 2021 MSGP. Part 6.2 of the 2021 MSGP outlines the following required elements:

- Stormwater pollution prevention team
- Site description
- Summary of potential pollutant sources
- Description of control measures
- Schedules and procedures
- Documentation to support eligibility considerations under other federal laws
- Signature requirements

The SWPPP presents all the required elements, although not in the order listed in the 2021 MSGP. Rather, the SWPPP is organized to accommodate specific NAVMAG Indian Island operations.

Tables are used as much as possible to clarify presentation of information. Figures are presented as simply as possible for use in the field. Appendices are used to organize procedures, to provide quick access to figures, and to provide for tracking and recordkeeping.

A SWPPP revision-record table is provided to document revisions to the SWPPP.

So as not to duplicate effort or run the risk of publishing conflicting information, whenever possible other applicable environmental, natural resource, and cultural resource management plans are referenced to fulfill requirements of the SWPPP. When these plans are referenced, they are listed in Section 8 of the SWPPP along with all the other references in the SWPPP. Either a copy of each referenced plan or a description of where it may be accessed is included in Section 8.

## 1.4 Stormwater Pollution Prevention Team

Per the 2021 MSGP Section 6.2.1, a Pollution Prevention Team is responsible for assisting NAVMAG Indian Island's Commanding Officer in developing, implementing, maintaining, and revising the facility's SWPPP. The Pollution Prevention Team will meet on an as needed basis. Some specific tasks of the team include:

- Review and follow-up on any outstanding issues/concerns from the previous meeting.
- Discuss pollution prevention techniques/methods.
- Plan and discuss stormwater training needs/methods.
- Coordinate stormwater pollution prevention efforts.
- Plan and discuss implementation of required monitoring and inspections.
- Discuss and implement corrective actions that result from required monitoring and inspections.
- Assist with updating the SWPPP.
- Address any concerns that may have been raised since the last meeting.

Table 1-1 lists members of the NAVMAG Indian Island Stormwater Pollution Prevention Team.

**Table 1-1: Stormwater Pollution Prevention Team**

<b>Leader:</b>	Christopher Jorgensen, Naval Base Kitsap
<b>Title:</b>	Environmental Engineer
<b>Phone Number:</b>	(360)315-1992
<b>E-mail:</b>	<a href="mailto:christopher.jorgense@navy.mil">christopher.jorgense@navy.mil</a>
<b>Responsibilities:</b>	Ensure provisions of the SWPPP are carried out at NAVMAG Indian Island. Train team members on SWPPP requirements. Ensure appropriate NAVMAG Indian Island staff and contractors receive required stormwater training. Help personnel understand and implement the SWPPP. Call meetings of the team. Act as liaison between the team and Naval Base (NAVBASE) Kitsap. Ensure inspections and monitoring is completed. Update the SWPPP to ensure continued compliance with the 2021 MSGP, to reflect any facility changes, and by inserting inspection reports, monitoring results, certifications, Discharge Monitoring Reports, meeting minutes, significant e-mails, and correspondence.
<b>Core Team Member:</b>	Yes
<b>Team Member:</b>	Sara Street, NAVMAG Indian Island
<b>Title:</b>	Environmental Protection Specialist
<b>Phone Number:</b>	(360)396-5394
<b>E-mail:</b>	<a href="mailto:sara.c.street@navy.mil">sara.c.street@navy.mil</a>
<b>Responsibilities:</b>	Primary point-of-contact at NAVMAG Indian Island. Coordinate and assist as needed with on-site efforts such as sampling/monitoring, inspections, and meetings. Interface between SWPPP team activities and Facilities Branch. Work with Facilities Branch to ensure that construction site stormwater controls are developed and implemented.
<b>Core Team Member:</b>	Yes
<b>Team Member:</b>	Bill Kalina, NAVMAG Indian Island
<b>Title:</b>	Environmental Site Manager
<b>Phone Number:</b>	(360)396-5353
<b>E-mail:</b>	<a href="mailto:william.kalina@navy.mil">william.kalina@navy.mil</a>
<b>Responsibilities:</b>	Act as interface and advocate for the SWPPP Team with NAVMAG Indian Island upper management.
<b>Core Team Member:</b>	No
<b>Team Member:</b>	Matt Jabloner, Naval Facilities Engineering Command Northwest
<b>Title:</b>	Environmental Engineer
<b>Phone Number:</b>	(360)396-0050
<b>E-mail:</b>	<a href="mailto:matt.jabloner@navy.mil">matt.jabloner@navy.mil</a>
<b>Responsibilities:</b>	Internal Navy consultant. Provide regulatory guidance including compliance with the 2021 MSGP, general Clean Water Act input, and environmental engineering advice as related to stormwater controls.
<b>Core Team Member:</b>	No

Table 1-1 designates team members as “core” or “non-core.” Core team members are those that attend regular team meetings and work regularly with the team leader. Non-core team members take part on an as needed/as requested basis. Non-core team members will generally not take part in day-to-day activities of the team.

## 1.5 Endangered Species

The March 1, 2021 re-issuance of the MSGP required operators to certify that their stormwater discharges, allowable non-stormwater discharges and BMPs are not likely to jeopardize any species listed as endangered or threatened under the Endangered Species Act. The requirement for protection of Endangered and Threatened Species and Critical Habitat Protection is described in 2021 MSGP Part 1.1.4. Appendix E of the 2021 MSGP permit provides guidance that will be used to document NAVMAG Indian Island’s permit eligibility with respect to endangered species.

For the 2015 MSGP Notice of Intent NAVMAG Indian Island applied as endangered species Criterion C (Federally listed threatened or endangered species or their designated critical habitat(s) are likely to occur in or near your facility’s “action area,” and your industrial activity’s discharges and discharge-related activities are not likely to adversely affect listed threatened or endangered species or critical habitat). The Navy ensures that the USFWS or NMFS are consulted regarding activities that may adversely affect federally listed species, marine mammals, or critical habitat.

For the 2021 MSGP Notice of Intent the endangered species Criterion C1 (Facility eligible for Criterion C in the 2015 MSGP with NO CHANGE to listed species, critical habitat, or action area) has been determined for NAVMAG Indian Island.

The facility’s action area has not changed and no species nor critical habitat has been listed by the USFWS and /or NMFS. The only change has been that the Canary Rockfish has been removed from the listings. Additionally, USFWS, NMFS, and WDFW have participated in an annual Integrated Natural Resources Management Plan evaluation, which is documented through the DoD Natural Resources Conservation metrics. The INRMP is updated annually through this regulatory agency review.

There is no reason to believe that NAVMAG Indian Island stormwater discharges, allowable non-stormwater discharges, and discharge related activities would cause adverse impacts to federally listed species or critical habitat.

## 1.6 Historic Places

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to take into account the effects of federal “undertakings” on historic properties. The EPA’s issuance of the MSGP is not a federal undertaking within the meaning of the NHPA regulations. To address any issues relating to historic properties in connection with issuance of a MSGP, the EPA included criteria for applicants to certify that potential impacts of their covered activities on historic properties have been appropriately considered and addressed.

Section 1.1.5 of the 2021 MSGP specifies that coverage under this permit is available only if stormwater discharges, allowable non-stormwater discharges, and stormwater discharge related



activities meet one or more of the eligibility criteria in the 2021 MSGP. Appendix F of the 2021 MSGP provides the procedures to follow to determine which criteria are met.

Based on observations and research completed during update of the SWPPP and historic stormwater drainage patterns, existing stormwater conveyances do not have the potential to adversely affect the characteristics that would make a property eligible for inclusion in the National Registry of Historical Places since existing patterns would potentially be part of those characteristics.

Additionally, should any individual construction projects be planned that include impacts from stormwater discharge, new construction, or updates to existing stormwater utility lines, consultation would be done separately, and outside of this permit, with the State Historic Preservation Office (SHPO) and Tribes (THPO).

Therefore Criterion A (Your stormwater discharges and allowable non-stormwater discharges do not have the potential to have an effect on historic properties and you are not constructing or installing new stormwater control measures on your site that cause subsurface disturbance), apply (2021 MSGP, Appendix F).

Also, see SWPPP Section 4.1.7 and Appendix D for requirements concerning future construction activities.

## 1.7 SWPPP Compliance Requirements

A number of ongoing activities related to the SWPPP are required for compliance under the 2021 MSGP. These SWPPP compliance requirements are summarized in Table 1-2.

**Table 1-2: Summary of SWPPP Compliance Requirements**

<b>SWPPP Compliance Requirement</b>	<b>SWPPP Section</b>	<b>Permit Part</b>
Form a stormwater pollution prevention team.	1.6.1	6.2.1
Implement control measures/BMP Plan.	4	2
Perform stormwater sampling and prepare reports.	5	7
Prepare and submit reports of releases of hazardous materials or oil in excess of reportable quantities.	1.6.2	2.1.2.4
Complete facility visual inspections and document.	6.1	3.1
Complete maintenance and document.	7.4	2.1.2.3, 6.5
Complete employee training and document.	7.4	2.1.2.8, 6.5
Submit Annual Report.	6.3	7.5
Update SWPPP when a change in industrial facilities occurs or if current SWPPP is ineffective.	1.6.4 and 7.1	5.1.1, 5.1.2, 6.3
Implement and Document Corrective Actions	7.2	5
Retain SWPPP reports and records on-site until three years after event and at least three years after permit expires.	1.6.5	7.8
Ensure all reports are signed by an appropriate authority.	1.6.6	B.11

The permit also requires maintaining records of various compliance activities. These records include facility visual inspection, maintenance records, and employee training. Recordkeeping requirements are summarized in Section 7 of the permit.

### 1.7.1 Plan Availability

This SWPPP will be kept on-site at NAVMAG Indian Island by the NAVMAG Stormwater Program Manager and will be made available upon request to the EPA regional director or an authorized representative. The EPA may notify the Navy at any time that this SWPPP does not meet one or more of the minimum requirements of the 2021 MSGP. A notification of this type identifies the provisions of the Permit not being met by the SWPPP and identifies the provisions of the plan requiring modification.

Public access to SWPPP information is required by the 2021 MSGP. If you provide a URL in your NOI where your SWPPP can be found, and maintain your current SWPPP at this URL, you will have complied with the public availability requirements for the SWPPP. If you did not provide a SWPPP URL in your NOI, your NOI must include the information required by Part 6.4 of the 2021 MSGP.

### 1.7.2 Revisions and Updates

This SWPPP will be amended whenever there is a change in design, construction, operation, or maintenance of the facilities at NAVMAG Island covered by this plan or the addition of a new industrial facility that has a significant effect on the potential for the discharge of pollutants to the waters of the United States. In addition, this SWPPP will be amended if it proves to be ineffective in eliminating or significantly minimizing pollutants from the sources identified or in otherwise achieving the general objectives of controlling pollutants in stormwater associated with industrial activity. (See Part 6.3 of the permit.)

### 1.7.3 Retention of Records

Requirements for retention of SWPPP records are identified in Part 7.7 of the 2021 MSGP. In general, the Navy is required to retain this SWPPP, records of all monitoring information, copies of all reports required by the SWPPP, and records of all data used to complete the NOI until at least three years after coverage under the permit is terminated.

### 1.7.4 Signatory Requirements

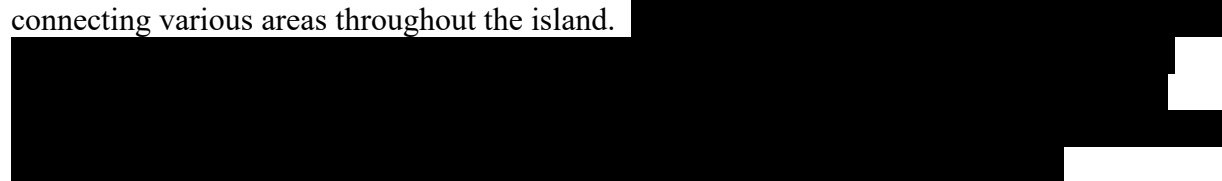
As required by the permit, this SWPPP and all reports required by this SWPPP shall be signed by a principal executive officer or ranking elected official. A principal executive officer of a federal agency includes (1) the chief executive officer of the agency, (2) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency, or a duly authorized representative of (1) or (2). The signature authority can be delegated to a duly authorized representative. If the authority is delegated, a signed, dated copy of the delegation authority must be included with the SWPPP. All documents shall have the following certification.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

## 2 Site Description

### 2.1 Site Characteristics

NAVMAG Indian Island is located in Jefferson County, Washington. The Navy owns the majority of Indian Island (the island), which is approximately 5-miles long, 1.25-miles wide, and 2,716 acres in area. A small portion on the southern extent of the island is non-Navy owned, and State Route 116 traverses through this section allowing access to Marrowstone Island, which is located to the east of Indian Island. Approximately 2,100 acres of the island is third growth coniferous forest, although there is an extensive paved roadway system of about 26 miles connecting various areas throughout the island.



The southern half of Indian Island has fairly steep terrain with a maximum elevation of about 350 feet. The northern half of the island is generally level with some steep areas and a maximum elevation of about 150 feet. A ridge runs roughly north south down the center of the island promoting drainage to the west or east on respective sides of the island. The majority of the island is wooded. Land use on non-wooded areas includes structures (offices, shops, storage, utilities, parking, and security), roads, and recreation. There are manicured grass areas around structures and in recreation areas (such as picnic areas). Small lakes/ponds and wetlands are the primary fresh surface water resources. There is a tidal salt marsh located near the Ammunition Wharf on the northwest corner of the island.

Appendix A, Figure A-1 shows the vicinity of Indian Island, general layout, overall drainage patterns, and fresh and marine water bodies.

### 2.2 Precipitation Information

The weather station closest to Indian Island is in Port Townsend, WA. Historic information from that station was used to develop Table 2-1. The period of record for this data is 10/1/1891 to 1/31/2010. The information was obtained from the following web site:

<http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?wa6678>

**Table 2-1: Annual Precipitation Information**

<b>Month</b>	<b>Avg. Total Precipitation (inch)</b>	<b>Avg. Total Snowfall (inch)</b>
January	2.21	1.7
February	1.64	1.5
March	1.60	0.5
April	1.38	0.0
May	1.53	0.0
June	1.28	0.0
July	0.75	0.0
August	0.80	0.0
September	1.08	0.0
October	1.54	0.0
November	2.39	0.5
December	2.55	1.2

The annual average total precipitation is 18.74 inches. While there is some snowfall noted in Table 2-1, it is sporadic and on average, the depth is zero. Winter has the highest rainfall followed by fall, spring, and summer.

## 2.3 Description of Stormwater Drainage

### 2.3.1 Drainage Basin Delineation

Appendix A, Figure A-1 shows the drainage basin outlines and flow directions. The majority of the Sector P and Q facilities are drained by areas C, D, and E. Appendix A, Figure A- 1 shows the location of the Sector P and Q facilities with respect to drainage basin.

### 2.3.2 Impervious Surface Area Estimate

There are about 163 acres of impervious surfaces at Indian Island, including facilities, roads, road shoulders, parking, laydown areas, storage areas and truck lots. The total island area is about 2,716 acres with about 6% of the island being impervious.

### 2.3.3 Receiving Waters and Wetlands

Receiving waters and wetlands are shown on Appendix A, Figure A-1. The majority of drainage from industrial areas, shown in the various figures in Appendix A, discharges into Port Townsend Bay with some minor drainage into Killisut Harbor. Anderson Lake, located on the southeastern corner of the island is the major fresh water resource. No industrial areas drain into Anderson Lake. A number of forested/shrub-scrub and tidal/marine wetlands exist on the island. Table 2-2 provides details on individual wetlands at NAVMAG Indian Island. Very little drainage from industrial areas enters wetlands. Some drainage from the Ammunition Wharf complex drains into the adjacent tidal salt marsh (Walan Point).

**Table 2-2: Wetlands**

<b>Name (Appendix A Figure A-1 Ref. #)</b>	<b>Type</b>	<b>Area</b>	<b>Note</b>
Boggy Spit (1)	Tidal/marine	4.8 acres	
Walan Point (2)	Tidal/marine	18.7 acres	Wildlife Refuge
Not named (3)	Fresh	6.4 acres	Located near Facility 828.
Not named (4)	Tidal/marine	0.9 acre	
Puyallup Road (5)	Tidal/marine	2.4 acres	
Not named (6)	Fresh	4.5 acres	Located near Facility 95
Not named (7)	Fresh	2.8 acres	Located near Facility 94.
Not named (8)	Fresh	3.1 acres	
Sunny Cove Salt Marsh (9)	Tidal/marine	0.4 acre	
Bishop Spit (10)	Tidal/marine	0.8 acre	Wetland surrounds surface water.
Anderson Lake (11)	Fresh	2.5 acres	Wetland surrounds Anderson Lake.

#### 2.3.4 Water Quality and Impaired Receiving Waters

The Clean Water Act (CWA) mandates that each state develop a program to monitor the quality of its surface waters and prepare a report describing the status of its water quality. The most current Integrated Water Quality Monitoring and Assessment Report for Washington state is the 2012 Water Quality Assessment (WQA) 305(b) report and 303(d) list.

Per the 2012 303(d) list, marine waters are divided into grid cells and assigned to one of five WQA Categories as defined below. There is a grid cell in Water Resource Inventory Area (WRIA) 17 Quilcene-Snow (listing ID 53180) along the northwest shore of Indian Island that is assessed as a Category 5 impaired water body for fecal coliform. This Category 5 grid is surrounded by two Category 2 grid cells for fecal coliform (listing IDs 53194 and 40317). The west shoreline has three Category 2 grid cells for sediment (Phenol, Benzoic Acid, and Benzyl Alcohol), a Category 2 grid cell impaired for dissolved oxygen, and a Category 1 grid cell impaired for temperature.

As part of the formal documentation, WDOE submitted a schedule and prioritization for the establishment of Total Maximum Daily Loads (TMDLs) for waters listed in Category 5. The WDOE 2012 WQA and 303(d) List Prioritization Schedule shows that efforts will begin in 2013 to establish TMDLs for WRIA 17 Quilcene – Snow, which is the area bordering NAVMAG Indian Island. Currently there is no TMDLs established for the NAVMAG Indian Island receiving waters.

More information concerning the WDOE 2012 WQA and 302(d) list can be found at the following web site.

<http://www.ecy.wa.gov/programs/wq/303d/currentassessmt.html>

See the following paragraph for a description of the WQA Categories taken directly from the WDOE web site

<http://www.ecy.wa.gov/programs/wq/303d/WQAssessmentCats.html> .

“Water quality assessment divides water-body impairments into the following categories:

- **Category 1 - Meets tested standards for clean waters:** Placement in this category does not necessarily mean that a water body is free of all pollutants. Most water quality monitoring is designed to detect a specific array of pollutants, so placement in this category means that the water body met standards for all the pollutants for which it was tested. Specific information about the monitoring results may be found in the individual listings.
- **Category 2 - Waters of concern:** Waters where there is some evidence of a water quality problem, but not presently enough to require production of a water quality improvement project or determine a Total Maximum Daily Load (TMDL). A TMDL is a calculation of the maximum amount of a pollutant that a water body can receive and still safely meet water quality standards (WQS). There are several reasons why a water body would be placed in this category. A water body might have pollution levels that are not quite high enough to violate the WQS, or there may not have been enough violations to categorize it as impaired according to WDOE listing policy. There might be data showing water quality violations, but the data were not collected using proper scientific methods. In all of these situations, these are waters that the state may want to continue to test.
- **Category 3 - Insufficient data:** This category will be largely empty. Water bodies that have not been tested will not be individually listed, but if they do not appear in one of the other categories, they are assumed to belong here.
- **Category 4 - Polluted waters that do not require a TMDL:** waters that have pollution problems that are being solved in one of three ways:
  - o **Category 4a - Has a TMDL:** water bodies that have an approved TMDL in place and are actively being implemented.
  - o **Category 4b – Has a pollution control program:** water bodies that have a program in place that is expected to solve the pollution problems. While pollution control programs are not TMDLs, they must have many of the same features, and there must be some legal or financial guarantee that they will be implemented.
  - o **Category 4c - Is impaired by a non-pollutant:** water bodies impaired by causes that cannot be addressed through a TMDL. These impairments include low water flow, stream channelization, and dams. These problems require complex solutions to help restore streams to more natural conditions.
- **Category 5 - Polluted waters that require a TMDL:** The traditional list of impaired water bodies traditionally known as the **303(d) list**. Placement in this category means that WDOE has data showing that the WQS have been violated for one or more pollutants, and there is no TMDL or pollution control plan. TMDLs are required for the water bodies in this category.”

### 2.3.5 Stormwater Outfalls

Most outfalls on the NAVMAG Indian Island facility are not associated with 2021 MSGP designated industrial activity and therefore are not addressed in the SWPPP. Table 2-3 lists outfalls and catch basins located at Sector P and Q facilities. Appendix A, Figure A-1 is an overall map of Indian Island showing the topography, drainage basins, stormwater flow

directions, wetlands, and color-coded Sector P and Sector Q facilities. The outfalls and catch basins are shown on the various figures in Appendix A. Figure A-13 indicates some of the Global Positioning System (GPS) coordinates of outfalls and wharfs.

**Table 2-3 Stormwater Outfall GPS Locations**

<b>Outfall or Catch Basin #</b>	<b>Old # for Ref.</b>	<b>Sector Association</b>	<b>North Coordinate</b>	<b>West Coordinate</b>	<b>Observations</b>
SW-010	M21	NA	48.04807	122.74802	8-9" dia. corrugated metal, not industrial
SW-020	M22	P, Q	48.04953	122.74185	8-9" dia. corrugated plastic, serves the stormwater pond to the east through CB-020B and the crane test lot through CB-020A.
CB-020A	CBM22	P	48.04951	122.74128	Drains the crane testing area
CB-020B	NA	NA			Located in the grass, this is the catch basin outlet for the stormwater pond.
SW-035	NA	P	-	-	Eight curb cuts along the quay slab w77
SW-035a	NA	P	48.05015	122.74211	Farthest South
SW-035b	NA	P			
SW-035c	NA	P			
SW-035d	NA	P			
SW-035e	NA	P	48.05057	122.74212	Intermediate curb cut
SW-035f	NA	P			
SW-035g	NA	P			
SW-035h	NA	P	48.05096	122.74212	Farthest North
SW-035i	NA	P			
SW-040	N21	P	48.05112	122.74206	14-18" dia. steel with bell on end
CB-040A	NA	P			Near Building 77
CB-040B	NA	P			Near Building 77
CB-040C	NA	P			Near Building 77
CB-040D	NA	P			Near Building 77
CB-040E	NA	P			Near Building 77
CB-040F	NA	P			Near Building 77
CB-040G	NA	P			Near Building 77
CB-040H	NA	P			Near Building 77
CB-040I	NA	P			Near Building 77
CB-040J	NA	P			Near Building 77
CB-040K	NA	P			Near Building 77
CB-040L	NA	P			Near Building 77
CB-040M	NA	P			
CB-040N	NA	P			
CB-040O	NA	P			
SW-050	N22	P	48.05120	122.74203	14-18" dia. Steel, No flow
SW-060	N23	Q	48.05265	122.74050	8-9" dia. PVC. Outlet of bio filter.



Outfall or Catch Basin #	Old # for Ref.	Sector Association	North Coordinate	West Coordinate	Observations
CB-060A	NA	Q	48.05266	122.74023	Near Building 90. LID bio filter installed Nov 2012.
SW-070	N24	P & Q	48.05336	122.73481	2.5' dia. Concrete, No flow, dye testing indicates that this outfall is not connected to CB-070A.
CB-070A	CBN24	P&Q	48.05317	122.73936	Large catch basin, Stormwater rarely flows into this catch basin
SW-080	N25	P	48.05359	122.73965	White corrugated, No flow
SW-090	P31	P	48.05560	122.73964	12" dia. Aluminum, No Flow
SW-100	P32	P	48.05687	122.73965	12" dia. Aluminum, No flow
SW-110	NA	P	48.05751	122.73965	14" steel with white coating, No flow
CB-110A	NA	P	48.05752	122.73757	At culvert that goes under the road
SW-120	NA	Q	48.07301	122.74226	This outfall now goes to a bio-infiltration pond that entirely infiltrates. The curb cut on the southwest edge of the pier cargo staging area 986 is no longer an outfall (2013).
SW-130	NA	Q	48.07677	122.74756	Ammunition Wharf. Distributed surface flow around pier perimeter that drains directly into the receiving water.
SW-140	NA	P	48.07494	122.74434	Just north of the north leg of the wharf, No flow except in really heavy rains. Not an industrial outfall.
IZ-e300	NA	P			Drainage swale along the road near the mud rinsing facility
IZ-300	NA				Drainage trench across the street from Building 300 running north
IZ-800	NA	P			Pond to the north of Building 800
IZ-821	NA	P			Drainage swales surrounding the truck lot 8
IZ-825e	NA	P			Pond to the east of Building 825
IZ-825w	NA	P			Pond to the west of Building 825
IZ-825	NA	P			Drainage swales surrounding the truck lot 7
IZ-826	NA	P			Drainage swales surrounding the truck lot 1
IZ-827	NA	P			Drainage swales surrounding the truck lot 2
IZ-828	NA	P			Drainage swales surrounding the truck lot 3
IZ-829	NA	P			Drainage swales surrounding the truck lot 4

Outfall or Catch Basin #	Old # for Ref.	Sector Association	North Coordinate	West Coordinate	Observations
IZ-830	NA	P			Drainage swales surrounding the truck lot 5
IZ-831	NA	P			Drainage swales surrounding the truck lot 6
IZ-837	NA	P	48.04582	122.72326	Toward the north edge of the compound, down the slope to the east of Building 837.
CB-837A	NA	P			
CB-837B	NA	P			
CB-837C	NA	P			
CB-837D	NA	P			
CB-837E	NA	P			
CB-837F	NA	P			
CB-837G	NA	P			
CB-837H	NA	P			
CB-837I	NA	P			
IZ-1030	NA	Q			
IZ- Fill depot (1019-1025)	NA	P			The fill depot is the infiltration area for buildings 1019-1025.

**Notes:**

SW = Stormwater outfall to receiving water from an industrial Sector. Stormwater outfalls are numbered from south to north.

IZ= Stormwater outfall to infiltration zone, does not reach receiving water and is not near receiving water. Infiltration zones are named for the building they are nearest.

CB= Catch basins are named to indicate which SW or which building it is near. Catch basin A is nearest the outfall or infiltration zone.

### 2.3.6 Water Quality Standards

The State of Washington establishes surface-water quality standards via Chapter 173-201A WAC (see <http://www.ecy.wa.gov/pubs/wac173201a.pdf>). The purpose of this section is to “establish water quality standards for surface waters of the state of Washington consistent with public health and public enjoyment of the waters and the propagation and protection of fish, shellfish, and wildlife, pursuant to the provisions of chapter 90.48 RCW.” Table 2-4 has use designations for the marine waters adjacent to Indian Island. The marine water bodies adjacent to Indian Island are: Oak Bay to the south; Port Townsend Bay to the west and northwest; Kilisut Harbor to the east and northern end; and Scow Bay to the east toward the southern end of the Island.

**Table 2-4: Water Quality Use Designations for Marine Waters Adjacent to Indian Island**

Category	Classification
Aquatic Life Use Classification	Extraordinary - Extraordinary quality salmonid and other fish migration, rearing, and spawning; clam, oyster, and mussel rearing and spawning; crustaceans and other shellfish (crab, shrimp, scallops, etc.) rearing and spawning.
Shellfish Harvest	Yes
Recreational Use	Primary Contact Recreation
Miscellaneous Uses	A. Wildlife Habitat B. Harvesting. Salmonid and other finfish harvesting, and crustacean and other shellfish (crab, shrimp, scallops, etc.). C. Commerce and Navigation Boating D. Aesthetic Values.

Table 2-5 lists applicable water quality standards for toxic substances in marine waters. The full list is included in Table 240(3) of WAC 173-201A. Substances considered applicable (and therefore included in Table 2-5) are those that must be monitored per the applicable 2021 MSGP sector. The 2021 MSGP benchmark monitoring value concentration is included for reference. Freshwater standards are not included in Table 2-5 because industrial areas of NAVMAG Indian Island do not discharge into freshwater streams, lakes, or rivers.

**Table 2-5: Selected Toxic Marine Water Quality Standards per WAC 173-201A**

Substance	Acute Standard <sup>a</sup>	Chronic Standard <sup>a</sup>	Benchmark Value	Note
Aluminum	none	none	1,100 µg/L Total Recoverable	Sector Q (water transportation), requires benchmark monitoring for aluminum. There is no marine water quality standard for aluminum.
Lead	210.0 µg/L	8.1 µg/L	210 µg/L Total Recoverable	Sector Q (water transportation), requires benchmark monitoring for lead.
Zinc	90.0 µg/L	81.0 µg/L	90 µg/L Total Recoverable	Sector Q (water transportation), requires benchmark monitoring for zinc.
pH			Report Only	Sector P Indicator monitoring.
COD			Report Only	Sector P Indicator monitoring.
TSS			Report Only	Sector P Indicator monitoring.

**Notes:**

<sup>a</sup>The Washington State Water Quality numbers are based on the dissolved fraction of the metal.

### 3 Industrial Facility Pollutant Sources

#### 3.1 Industrial Activities

NAVMAG Indian Island is

In fulfilling this mission, the work conducted at NAVMAG Indian Island falls under two 2021 MSGP sectors, Sector P: Land Transportation and Warehousing and Sector Q: Water Transportation. See the figures in Appendix A, for Industrial Sectors P and Q locations. Industrial processes conducted at NAVMAG Indian Island that do not fall under a defined sector in the 2021 MSGP are not directly addressed in the SWPPP.

#### 3.2 Spills and Leaks

Oil and Hazardous Substance (OHS) spill response at NAVMAG Indian Island is addressed in the Regional OHS Integrated Contingency Plan (ICP). The regional ICP is written to comply with the Oil Pollution Act (OPA) of 1990 regulations and 40 CFR 112.20.

The ICP contains information such as the description of actions that the station will take in response to an OHS spill and the process to notify the National Response Center (NRC) and other regulatory agencies. In addition, the ICP contains specific directions for ensuring prompt, efficient coordination and response to an OHS spill. The Navy spill response team would be called to assist immediately should an OHS release occur at NAVMAG Indian Island.

The current NAVMAG Indian Island Oil Spill Prevention, Control, and Countermeasure (SPCC) Plan refers to the ICP for a thorough description of spill response procedures for NAVMAG Indian Island. A brief summary of those procedures is as follows:

- Report oil spills immediately to Regional Dispatch at (360) 396-4444 or at 911 from a base telephone. Regional Dispatch will notify the Indian Island spill response team, which will, in turn, notify the following agencies:
  - o Jefferson County Dept. of Emergency Management; Business Hours (360) 385-9368, After Hours (360) 385-3831, Ext. 1
  - o Washington State Department of Ecology - (425) 649-7000
  - o Washington State Dept. of Emergency Management - (800) 258-5990
  - o National Response Center - (800) 424-8802

The NAVMAG Indian Island SPCC Plan provides in depth coverage of oil spill issues. Table 3-1 is a table from the SPCC Plan dated September 2012 that lists all the oil storage locations at NAVMAG Indian Island.

**Table 3-1: Tanks and Containers**

<b>Facility</b>	<b>Container Identification</b>	<b>Location</b>	<b>Type &amp; Year<sup>1</sup></b>	<b>Capacity (gallons)</b>	<b>Contents</b>	<b>Secondary Containment</b>
62	62-102	East of Bldg 62	UST, FRP, 2011	2500	Diesel	Double-walled tank and pipes
64	64-102	East side of Bldg 64	AST, diked, steel, 1999	1,000	Diesel	Double-walled tank and pipes
69	69-102	On hill east of Bldg 69	AST, diked, steel, 1999	5,000	Diesel	Yes, except for short length of pipe near tank
77	77-103	North of Bldg 77	UST, FRP, 2011	5,000	Diesel	Double-walled tank and pipes
84	Drum Storage	Inside Bldg 84	Drums	550 <sup>2</sup>	Lube oil	Pallets
84	Oil Cart	Inside Bldg 84	Mobile lube cart	265	Lube oil	Diked cart
84	84-106	NE corner of Bldg 84	UST, FRP, 2011	2,500	Diesel	Double-walled tank and pipes
84	84-102	Inside Bldg 84	AST, diked, steel	120	Waste oil	Yes
84	84-103	Inside Bldg 84	AST, diked, steel	120	Waste oil	Yes
84	84-105	Inside Bldg 84	AST, diked, steel	270	Lube oil	Diked tank
132	132-101	North of Bldg 132	UST, FRP, 2011	1,000	Diesel	Double-walled tank and pipes
132	Drum Storage	Inside Bldg 132	Drums	55	Lube oil	Containment pallet
184	184-103	SW of Bldg 84	AST, diked, 1999	1,000	Diesel	Double-walled tank and pipes
185	Drum Storage	North of Bldg 185	Covered pallet	365	Fuels/ Hydraulic	Yes, pallet floor
185	185-101	North of Bldg 185	AST, DW, steel, unk	5,000	Empty	Double walled tank
185	185-105	North of Bldg 185	AST, SW, steel, unk	1,100	Waste oil	Vaulted tank.
187	187-102	South of Bldg 187	UST, FRP, 2011	1,000	Diesel	Double-walled tank and pipes
189	189-102	East of Bldg 189	UST, ST, 2008	1,000	Diesel	Double-walled tank and pipes
301	301-101	NW of Bldg 301	UST, FRP, 2011	2,500	Diesel	Double-walled tank and pipes

Facility	Container Identification	Location	Type & Year <sup>1</sup>	Capacity (gallons)	Contents	Secondary Containment
836	836-101	NE corner of Bldg 836	UST, FRP, 2011	5,000	Diesel	Double-walled tank and pipes
848	848-101	SW corner of Bldg 848	UST, FRP, 2011	2,500	Diesel	Double-walled tank and pipes
848A	848A-101	East of Bldg 848	AST, DW, steel, 2011	250	Diesel	Double-walled
849	849-101	NW corner of Bldg 849	UST, FRP, 2011	2,500	Diesel	Double-walled tank and pipes
853	853-101	Facility 853	AST, DW, steel, 2010	305	Diesel	Double-walled
925	925-101	East of Bldg 84 w/generator	AST, DW, 2006	145	Diesel	Double-walled
1030	1030-102	South of Bldg 1030	UST, DW, FRP, 2005	1,000	Diesel	Yes, except for short length of pipe near building
1037	1037-01	Facility 1037	AST, DW, steel, 2002	200	Diesel	Yes
Mobile Fuel Truck	MFT-101	Fuel Truck	AST, SW, steel, unk	155	Diesel	None
Mobile Fuel Truck	MFT-102	Fuel Truck	AST, SW, steel, unk	65	Diesel	None
1 - Abbreviations: AST = aboveground storage tank DW = double-walled FRP = fiberglass reinforced plastic			ST = Steel SW = single-walled unk = unknown UST = underground storage tank			
2 – Approximate						
3- Less than 5 gallons remains in tank. Corrective action requires the tank to be emptied.						

Two methods are used to identify areas where potential spills and leaks can occur, which can contribute pollutants to stormwater discharges. The first is to evaluate past spills and leaks (see Tables 3-2 and 3-3), and the second is to focus inspections on facilities with high or medium leak and spill potential (see Table 3-4).

Table 3-2 outlines reportable spills from 2009 to 2020.

**Table 3-2: Reportable Spills from 2009-2020**

<b>Date</b>	<b>Spilled Material</b>	<b>Quantity</b>	<b>Location</b>	<b>Description/Cause (quoted from spill database)</b>
4/22/2011	Hydraulic Fluid	2 oz.	YC1635 NUWC Barge docked at the Small Craft Pier	At 08:45, a leak from a hose on an outdrive unit was discovered.
4/15/2015	Hydraulic Fluid	6 oz.	Port Townsend Bay	At 13:52, a boat leaked hydraulic oil from a failed hose into bilge and it was accidentally pumped overboard by bilge pump.
1/12/2017	JP-5 fuel	5 gal.	Port Townsend Bay at Ammunition Wharf	At 14:15, US Coast Guard cutter released JP-5 fuel during a refueling evolution.
12/22/2017	Hydraulic Fluid	8 oz.	Port Townsend Bay adjacent to Ammunition Wharf	At 09:58, a boat released hydraulic fluid from a steering pump hose.
9/25/2020	Gear Oil	16 oz,	Port Townsend Bay at Ammunition Wharf	At 12:03, rain washed gear oil in the water that had leaked onto the wharf from a container crane failed gearbox seal.

The low number of reportable spills over the past 11 years indicates that overall spill prevention procedures and control measures are effective.

Non-reportable spills are spills that were cleaned up before they could reach surface water.

Table 3-3 outlines non-reportable spills from 2009 to 2020.

**Table 3-3: Non-Reportable Spills from 2009-2020**

Date	Location	Time	Substance	Incident
2/2/2009	B.70 to B.185	10:25	Interthane Paint	Forklift punctured can. Drove POV to wash rack to clean out leaving trail.
12/12/2009	Port Townsend Bay	13:20	Diesel	Overflow of 3 gallons on a tug boat (confined to the tug boat, the spill did not reach the water)
3/15/2010	Building 62, EJB Public Works Shop	07:00	Diesel	Boiler Malfunction
4/8/2010	Building 1030	08:50	Diesel	Fuel from a boiler tank burp.
4/13/2011	Building 187 Dumpster	15:00	Latex paint mixed with water	Latex paint was inappropriately disposed of in a solid waste dumpster. Five gallons were spilled in the dumpster, which then mixed with rainwater. This mixture leaked from the dumpster.
6/1/2012	South leg of Ammunition Wharf	11:25	Hydraulic Fluid	Non-reportable. 5 gallons USCG Cutter Melon.
3/20/2013	Cargo Crane 4	07:36	Hydraulic Fluid	Non-reportable. Hydraulic hose burst during cargo on-load operations, 1 gallon.
12/21/2017	Ammunition Wharf	09:15	Anti-freeze coolant	Container crane radiator hose failed leaking 2 gallons of coolant onto wharf.

A review of non-reportable spills from 2009 to 2020 indicates:

- There were eight recorded spills during the period.
- The spills were associated with equipment malfunctions, operator error, and inappropriate disposal of wastes.

The method used to identify potential areas where spills and leaks could occur is based on the type and location of materials stored, amount of materials stored and overall activity in the area. Table 3-4 summarizes those facilities/areas deemed a high or medium priority with regard to potential spills and leaks to stormwater.

Each facility or area was evaluated and given a priority (high, medium, and low) based on the following criteria:



- Type of material stored. Liquids and fine granular material would have higher priority than solid materials.
- Amount of material stored.
- Relative likelihood of release of spills or leaks if they should occur. A facility, for example, with secondary containment would be given a lower priority than one without since the likelihood of release is less. Additionally materials stored indoors or under cover would have a lower priority than those stored outdoors.
- Location relative to surface water.
- Overall level of activity at the facility or area. Generally, the higher the activity levels the higher the chances for a spill to occur.

**Table 3-4: Spill and Leak Potential: High and Medium Priority Facilities**

Priority	Facility Number	Description
High	62	
Medium	70	
High	90T	
Medium	132	
Medium	185	
Medium	218	
Medium	300	
High	832	
Medium	833	
Medium	837	
Medium	986	
Medium	84*	
Medium	s77*	
Medium	n185*	
Medium	w300*	

**Notes:**

1. \*These are designated storage/laydown/parking areas.
2. The “n, s, e, or w” prefix indicates the area is nearby and north, south, east, or west of the numbered facility.

### 3.3 Non-Stormwater Discharges

Per the 2021 MSGP by the end of the first year of permit coverage all stormwater discharge points must be evaluated for any unauthorized non-stormwater discharges. The last dry weather outfall evaluation performed in 2019 is included in Appendix J, Figure J-2, no unauthorized non-stormwater discharges were found.

#### 3.3.1 Certification of Non-Stormwater Discharges

Appendix J contains results of the NAVMAG Indian Island Non-Stormwater Discharge Assessment and Certification completed in 1993/1994. The original signed/certified copy of the assessment for Facility 833, Waterfront Operations Building was lost so a new assessment for the facility was completed in May 2006. It is also included in Appendix J.

As part of the 2007 SWPPP update, dyed water testing was done to determine the disposition of vessel rinse water from Building 90. The testing was inconclusive, but the Building 90 vessel rinse area is presumed to infiltrate entirely into the ground. The floor drains in Building 90 have been plugged.

Dye testing was done in early 2013 in the Building 77 boiler room and restrooms floor drains. The dye testing showed that the drains flow to the sanitary sewer.

The 2021 MSGP allows non-stormwater discharges as follows:

- Discharges from emergency/unplanned firefighting activities
- Fire hydrant flushing
- Potable water, including uncontaminated water line flushing
- Uncontaminated air conditioning or compressor condensate
- Irrigation drainage
- Landscape watering provided all pesticides, herbicides, and fertilizers have been applied in accordance with manufacturer's instructions
- Pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed)
- Routine external building wash down which does not use detergents
- Containment boom pressure washing using no detergents
- Uncontaminated ground water or spring water
- Foundation or footing drains where flows are not contaminated with process materials such as solvents
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility, but NOT intentional discharges from the cooling tower (e.g., "piped" cooling tower blow-down or drains)
- Small boat rinsing

Most of the above non-stormwater discharges may occur at NAVMAG Indian Island with the exception of mist from cooling towers. Table 3-7 provides information on the source, location, and control measures/best management practices (BMPs), if any, employed for non-stormwater discharges.

**Table 3-7: Allowable Non-Stormwater Discharges**

Type of Non-Stormwater Discharge	Location of Discharge	Non-Stormwater Discharge BMP <sup>1</sup> Discussion
Fire Fighting	Various	No BMP
Fire Hydrant Flushing and Potable Water Line Flushing	NAVMAG Indian Island purchases water from Jefferson County. The water enters the Island near the main gate and is distributed through water mains that roughly run longitudinally down the center of the island. There are two reservoirs with capacities of 1.0 and 0.75 million gallons. Service lines branch off the mains to supply individual facilities. Hydrants are located along the mains and service lines. Hydrants and waterlines are flushed on an annual basis. Typically flush water discharges into roadside drainage swales. On an infrequent basis, the reservoirs are drained into the nearby woods to allow maintenance.	No BMP since flushing is done infrequently and there is a low probability of it causing erosion. There are no existing or proposed BMPs for this practice.
Potable Water	Potable water sources include small sources such as leaking hose bibs and freeze protection water on the Ammunition Wharf. To prevent wharf water lines from freezing potable, water is either automatically or manually discharged. The water discharges directly into Port Townsend Bay.	No BMPs are necessary for this practice/source.
Uncontaminated Air Conditioning or Compressor Condensate	There are no significant sources of air conditioning or compressor condensate at NAVMAG Indian Island. Public Works maintains and uses both portable and fixed air compressors that discharge small volumes of condensate. There are a few window-type air conditioners that discharge condensate.	No BMPs are necessary for this practice/source.
Landscape Watering	Limited landscape watering may occur at the main gate area and at the Administration Building, 69.	BMP K-1
Pavement Wash Waters	The Ammunition Wharf and Pier 218 are washed using potable water to remove bird waste, accumulated shells left by the gulls, and dirt. Other pavements (roads, parking lots) are not typically washed.	BMP K-2
Boat Ramp Boom Cleaning	Sea growth from oil containment booms is removed at boat ramp 289.	BMP F-1
Routine External Building Wash Downs	Buildings are occasionally washed (using either a pressure washer or hose) to remove dirt, debris, and mildew/mold. This is not a common/routine practice at NAVMAG Indian Island.	BMP K-3
Uncontaminated Ground Water or Spring Water	Some of the larger buildings such as Building 69 may have foundation drains. No springs are known to exist on station.	No BMPs are necessary for this practice/source.
Building 90 Vessel Rinse	This BMP applies to rinsing salt water and minor debris (e.g., seaweed) from vessel hulls and from internal parts of the outboard motor salt water-cooling system in the designated area behind Building 90.	BMP F-4

Type of Non-Stormwater Discharge	Location of Discharge	Non-Stormwater Discharge BMP <sup>1</sup> Discussion
Pier-side Vessel Deck Rinsing	Boat decks are rinsed to remove salt water, and bird and otter waste.	BMP K-4
Bulk Mud Removal by Rinsing	Bulk mud is rinsed off vehicles at e300. The purpose of this facility is to reduce large quantities of mud that can clog the vehicle wash area at Building 185.	BMP F-3
Mower Blade Rinsing	Grounds keeping mowers are rinsed to clean vegetation off the mower blades. This is done at Building 70 or at e300.	BMP K-5

**Note:** See Table 4-1 for the BMP descriptions.

### 3.4 Salt Storage

See Control Measure/Best Management Practice C-7 in Table 4-1 for details.

### 3.5 Applicable Industrial Facilities/Areas, Potential Pollutant Sources

Table 3-8 is a summary of potential pollutant sources from each identified 2021 MSGP sector-specific facility/area.

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Table 3-8: Facility Summary Table

Building #	Building Name	Sector	Description	Potential Pollutants	Exposed Materials Storage or Process	Spill/Leak Potential	Drainage Basin (see Figure A-1)	Figure A-	Designated leak-Prone Vehicle and Equipment Storage Areas <sup>1</sup>
62		P		POLs Acids Metals Paints	<input checked="" type="checkbox"/> Hazmat storage lockers are stored outside.	High	D	2 & 4	<input type="checkbox"/>
70		P		POLs Paints Cleaners	<input type="checkbox"/>	Medium	D	2 & 4	<input type="checkbox"/>
77		P		POLs	<input type="checkbox"/>	Low	D	2	<input type="checkbox"/>
84		P		POLs Solvents Metals Paints	<input checked="" type="checkbox"/> Materials and equipment are stored outside behind the building. Hazmat is stored outside in a fenced secondary containment behind the building.	Medium	D	2 & 4	<input checked="" type="checkbox"/>
90		Q		Metals Sediments	<input checked="" type="checkbox"/> Boat rinsing.	Low	D	2 & 5	<input type="checkbox"/>

<sup>1</sup> Per BMP P-1(a) (see Table 4-1) leak-prone vehicles and equipment can only be stored in certain designated areas where identification and cleanup of any leak will be readily noticed. This column identifies those areas.

Building #	Building Name	Sector	Description	Potential Pollutants	Exposed Materials Storage or Process	Spill/Leak Potential	Drainage Basin (see Figure A-1)	Figure A-	Designated leak-Prone Vehicle and Equipment Storage Areas <sup>1</sup>
T90		Q		POLs Solvents Metals Paints	<input checked="" type="checkbox"/> Liquid transfers. No materials are stored outside.	High	D	5	<input type="checkbox"/>
132		Q		POLs Solvents Metals Paint	<input checked="" type="checkbox"/> Liquid transfers	Medium	D	2 & 5	<input type="checkbox"/>
162		P		POLs	<input checked="" type="checkbox"/> Fuel tanks from equipment.	Low	D	2 & 4	<input type="checkbox"/>
185		P		POLs Wash water	<input checked="" type="checkbox"/> POL	Medium	D	2 & 4	<input type="checkbox"/>
218		Q		POLs	<input checked="" type="checkbox"/> Possible POL spills from the boats.	Medium	D	2	<input type="checkbox"/>
289		Q		POLs Organic matter Solids	<input checked="" type="checkbox"/> POLs could be present on the booms.	Low	D	2	<input type="checkbox"/>



Building #	Building Name	Sector	Description	Potential Pollutants	Exposed Materials Storage or Process	Spill/Leak Potential	Drainage Basin (see Figure A-1)	Figure A-	Designated leak-Prone Vehicle and Equipment Storage Areas <sup>1</sup>
290		P Q		POLs Metals	<input checked="" type="checkbox"/> Materials containing metals are stored outside. Materials are moved with trucks and fork trucks (potential POL sources).	Low	D	2	<input type="checkbox"/>
300		P		POLs Wastes	<input checked="" type="checkbox"/> No materials or wastes are stored outside. Transfers are conducted.	Medium	D	2 & 6	<input type="checkbox"/>
800		P		POLs	<input checked="" type="checkbox"/> Trucks	Low	D	1 & 11	<input type="checkbox"/>
821		P		POLs	<input checked="" type="checkbox"/> Trucks, Truck trailer and container storage	Low	E	1 & 10	<input type="checkbox"/>
826		P		POLs	<input checked="" type="checkbox"/> Trucks, Truck trailer and container storage	Low	E	1 & 10	<input type="checkbox"/>
827		P		POLs	<input checked="" type="checkbox"/> Trucks, Truck trailer and container storage	Low	C	1 & 10	<input type="checkbox"/>
828		P		POLs	<input checked="" type="checkbox"/> Trucks, Truck trailer and container storage	Low	E	1 & 10	<input type="checkbox"/>
829		P		POLs	<input checked="" type="checkbox"/> Trucks, Truck trailer and container storage	Low	E	1 & 10	<input type="checkbox"/>
830		P		POLs	<input checked="" type="checkbox"/> Trucks, Truck trailer and container storage	Low	E	1 & 10	<input type="checkbox"/>
831		P		POLs	<input checked="" type="checkbox"/> Trucks, Truck trailer and container storage	Low	E	1 & 10	<input type="checkbox"/>

Building #	Building Name	Sector	Description	Potential Pollutants	Exposed Materials Storage or Process	Spill/Leak Potential	Drainage Basin (see Figure A-1)	Figure A-	Designated leak-Prone Vehicle and Equipment Storage Areas <sup>1</sup>
825 <sup>2</sup>		P		POLs	☒ Trucks, Truck trailer and container storage	Low	C	1 & 10	<input type="checkbox"/>
832		Q		POLs Metals Paints Acids	☒ Cranes Trucks	High	D	3 & 9	<input type="checkbox"/>
833		Q		POLs Metals Paints	☒ Metal containers and scrap recycled metals stored outside.	Medium	D	3 & 8	<input type="checkbox"/>
834		Q		TSS	☒ Saw dust	Low	D	3 & 7	<input type="checkbox"/>
837 and 838		P		POL Paints Solvents Particulate	☒ Paints are transported from Building 838 to 837. Scrap metal is stored outside.	Medium	C	1 & 11	<input type="checkbox"/>
955		Q		POLs	☒ Trucks	Low	D	3 & 7	<input type="checkbox"/>
986		Q		POLs Metals	☒ Cranes Exposed waste and recycle containers	High	D	3 & 7	<input type="checkbox"/>

<sup>2</sup> Located near Building 38. Also known as Lot 7.

Building #	Building Name	Sector	Description	Potential Pollutants	Exposed Materials Storage or Process	Spill/Leak Potential	Drainage Basin (see Figure A-1)	Figure A-	Designated leak-Prone Vehicle and Equipment Storage Areas <sup>1</sup>
1019-1025		P		POLs Metals	<input checked="" type="checkbox"/> Trucks Loading equipment	Low	C	1	<input type="checkbox"/>
1030		Q		POLs Metals	<input checked="" type="checkbox"/> Trucks Loading equipment Metal containers and scrap recycled metals stored outside	Low	C	1 & 11	<input type="checkbox"/>
w63*		P		POLs	<input checked="" type="checkbox"/> Trucks Mud track-out	Low	D	1, 2, & 5	<input type="checkbox"/>
e77* and s77*		P		POLs sediment	<input checked="" type="checkbox"/> Crane testing has the potential for fluids leaking from the cranes.	Medium	D	2	<input type="checkbox"/>
s77*		Q		POLs sediment	<input checked="" type="checkbox"/>	Low	D	2	<input type="checkbox"/>
e300*		P		POLs TSS	<input checked="" type="checkbox"/> Mud	Low	D	1	<input type="checkbox"/>
n185*		P Q		POLs Metals Nutrients	<input checked="" type="checkbox"/> Leak prone vehicles	Medium	D	2	<input checked="" type="checkbox"/>
e187/924*		P		POLs	<input type="checkbox"/>	Low	D	2 & 5	<input checked="" type="checkbox"/>
w300*		P		POLs TSS	<input checked="" type="checkbox"/> Sand Pile	Medium	D	2	<input checked="" type="checkbox"/>

Building #	Building Name	Sector	Description	Potential Pollutants	Exposed Materials Storage or Process	Spill/Leak Potential	Drainage Basin (see Figure A-1)	Figure A-	Designated leak-Prone Vehicle and Equipment Storage Areas <sup>1</sup>
				Metals	Exposed equipment				
e918*		P		POLs Sediments	<input checked="" type="checkbox"/> Vehicle mud track-out	Low	D	3	<input type="checkbox"/>
e1019		P		Sediment	<input checked="" type="checkbox"/> Mud	Low	C	1 & 10	<input type="checkbox"/>

Notes:

\*These are designated storage/laydown/parking areas. The “n, s, e, or w” prefix indicates the area is nearby and north, south, east, or west of the numbered facility.

Sector P: Land Transportation and Warehousing

Sector Q: Water Transportation

POLS – Petroleum, Oils, and Lubricants

L/UL – Loading/Unloading

TSS – Total Suspended Solids

## **4 Stormwater Control Measures/Best Management Practices**

NAVMAG Indian Island has the advantage of being well wooded with very few hard-piped stormwater conveyances. Wooded areas allow rainwater to infiltrate into the ground. The natural and man-made, non-hard-piped stormwater conveyance systems tend to allow stormwater runoff to infiltrate into the ground and also tend to “clean” it prior to discharge.

NAVMAG Indian Island will maintain all Stormwater Control Measures/Best Management Practices (BMPs) identified in this SWPPP in effective operating condition. If a site inspection identifies BMPs that are not operating effectively, maintenance will be performed before the next anticipated storm event or as necessary to maintain the continued effectiveness of stormwater controls. If maintenance prior to the next anticipated storm event is impracticable, maintenance will be scheduled and accomplished as soon as practicable. In the case of non-structural BMPs, the effectiveness of the BMP will be maintained by appropriate means (e.g., spill response supplies available and personnel trained, etc.).

The following types of BMPs are described in detail in Table 4-1:

- Core BMPs C-1 through C-12, applicable at all sectors
- Facility/Area Specific BMPs F-1 through F-8
- Structural Stormwater Controls S-1 through S-8
- Sector P Land Transportation and Warehousing BMPs P-1 through P-3
- Sector Q Water Transportation BMPs Q-1 through Q-4
- Non-Stormwater Discharge BMPs, K-1 through K-5 and F-1 through F-4, describe the actions for allowable non-stormwater discharge processes.

### **4.1 Control Measures/Best Management Practices**

#### **4.1.1 Core BMPs**

NAVMAG Indian Island must select, design, install, and implement control measures (including best management practices) to address the selection and design considerations in 2021 MSGP Part 2.1.1, meet the non-numeric effluent limits in Part 2.1.2, and meet limits contained in applicable effluent limitations guidelines in Part 2.1.3.

Core Stormwater Control Measures/Best Management Practices (Core BMPs) are those required in the 2021 MSGP (Part 2.1.2) that generally apply to industrial areas of NAVMAG Indian Island.

Some of the steeper slopes on the southern end of the Island may naturally experience erosion that is not a concern in the context of this SWPPP. Shoreline erosion also occurs on Indian Island that generally is not a concern in the context of the SWPPP. Areas of potential shoreline erosion and cliff erosion associated with man-made structures and potentially increased by stormwater runoff are addressed in Table 4-1 under the Core BMPs.

#### **4.1.2 Facility/Area Specific BMPs**

Facility BMPs include BMPs associated with a specific area, facility, or process. Some facility specific BMPs address allowable non-stormwater discharges.

#### 4.1.3 Structural Stormwater Controls

Structural stormwater controls at NAVMAG Indian Island are mainly associated with specific facilities and are engineered type stormwater controls.

#### 4.1.4 Sector P BMPs

These BMPs are the sector specific BMPs required by the 2021 MSGP, Section 8, P Land Transportation and Warehousing. Unless otherwise noted, these BMPs apply mainly to those facilities/operations associated with that sector (see Table 3-8 for sector designations).

#### 4.1.5 Sector Q BMPs

These BMPs are the sector specific BMPs required by the 2021 MSGP, Section 8, Q Water Transportation. Unless otherwise noted, these BMPs apply mainly to those facilities/operations associated with that sector (see Table 3-8 for sector designations).

#### 4.1.6 Non-Stormwater Discharge BMPs

These are BMPs associated with facilities or processes that have allowed non-stormwater discharges.

#### 4.1.7 Construction BMPs

Additionally construction activities are addressed in Appendix D.

**Table 4-1: Stormwater Control Measures/Best Management Practices**

BMP Number	BMP Title	BMP	Notes
C-1	Eliminate and Minimize Exposure (Core BMPs)	<p>Where practicable, industrial materials and activities will be protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, or run-off. Pay particular attention to minimizing exposure from dust/debris causing activities and non-ferrous (copper, aluminum, zinc, etc.) metals storage.</p> <ul style="list-style-type: none"> <li>-Do not conduct outdoor vehicle, equipment, or material washing activities that will drain into the storm sewer. Certain exceptions using only potable water are authorized in the SWPPP.</li> <li>-All outdoor trash containers shall be covered to minimize rainfall exposure.</li> <li>-All large metal recycling containers (40-yard roll-off type) shall be covered with a solid lid, to prevent precipitation from entering them. They shall be used to collect and store metals for recycling. They may receive any type of metal (i.e., ferrous and non-ferrous) for recycling, as long as they are kept covered. These containers are taken to a recycle center on an as-needed basis (when they are full). These containers shall be painted blue and be labeled on at least two sides with the words "METAL RECYCLING ONLY."</li> <li>-All smaller metal recycling containers (self-dumping hoppers) shall be under cover or have lids unless safety is an issue. An example of safety issue is on the wharf where high winds could rip a lid off a recycling container or a canopy would obstruct visibility and maneuverability. In a case where safety is an issue, the small recycling bins must be painted blue and will NOT require lids or to be under cover. They must be labeled on at least two sides with the words, "NO COPPER, NO ZINC, NO LEAD, NO SHAVINGS" (RED LETTERS ON WHITE BACKGROUND). These self-dumping hoppers shall be emptied into larger holding containers (40-yard, covered roll-offs) once per week or when full (whichever comes first). All metal recycling containers shall be checked periodically by a qualified Environmental Specialist to ensure that the BMPs are being followed.</li> <li>-Dispose of obsolete equipment and unused metal stock.</li> <li>-Cover metal stock stored outside.</li> <li>-Use grading, berming, or curbing to prevent run-off of contaminated flows and divert run-on away from these areas.</li> <li>-Locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas).</li> <li>-Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants.</li> <li>-Use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible.</li> <li>-Use spill/overflow protection equipment.</li> <li>-Drain fluids from equipment and vehicles prior to on-site storage or disposal.</li> <li>-Perform all cleaning operations indoors, under cover, or in bermed areas that prevent run-off and run-on, and also that capture any overspray.</li> <li>-Ensure that all wash water drains to a proper collection system, not the stormwater drainage system.</li> </ul>	Minimizing exposure of pollutants to stormwater is a core BMP required under the 2021 MSGP.

BMP Number	BMP Title	BMP	Notes
C-2	Good Housekeeping (Core BMP)	Keep all exposed areas of NAVMAG Indian Island in a clean, orderly manner where such exposed areas could contribute pollutants to stormwater discharges. Recommended measures include, frequent sweeping, covering the trenches with rubber mats if grinding, sandblasting, or machine work is conducted near a trench, and minimizing storage of hazardous materials near the trenches. Conduct all maintenance work inside to the maximum extent practicable. If work is conducted outside, vacuum all particulates.	The 2021 MSGP requires implementation of good housekeeping practices. The Facilities Branch oversees a number of contractors that provide services such as pavement sweeping, solid waste removal, and recyclable removal.
C-3	Preventative Maintenance (Core BMP)	The NAVMAG Indian Island preventive maintenance program will include timely inspection and maintenance of stormwater management devices (e.g., cleaning oil/water separators, catch basins) as well as inspection, testing, maintaining, and repairing facility equipment and systems to avoid breakdowns or failures that may result in discharge of pollutants to surface waters.	Preventative maintenance is one of the core BMPs required under the 2021 MSGP. The West Sound Base Operating Support contract/contractor provides most facility and equipment preventative maintenance. The contract requires the contractor to: Pump septic tanks; operate, maintain, clean, and repair the wastewater and stormwater systems; clean oil water separators; provide some crane services, conduct vehicle maintenance, and sweep pavements.
C-4	Spill Prevention and Response Procedures (Core BMP)	-Applicable personnel shall be trained in spill response. Adequate spill response supplies will be stationed near potential spill locations. -The NAVMAG Indian Island Spill Prevention, Control, and Countermeasures (SPCC) Plan and Navy Region Northwest Oil and Hazardous Substance Integrated Contingency Plan (NRNW ICP) are active and effective in preventing and responding to spills. NAVMAG Indian Island is Annex H of the NRNW ICP. No significant actions with regard to spill prevention and response procedures are included or necessary in this plan. However, the SWPPP does require that regular (quarterly and annual) inspections include consideration of spill potential. Spill response phone numbers are included in SWPPP section 3.2. -The SPCC Plan also includes evaluations and recommended actions for oil storage facilities at NAVMAG Indian Island where spills may have a negative impact on the environment. The SPCC Plan applies to oil storage and management. Oil means oil of any kind and in any form, including, but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil. -The SPCC plan applies to: Each aboveground container (e.g., a tank or a drum) with an oil storage capacity of 55 gallons or greater that is not associated with the transfer to or from vessels or wastewater treatment. The plan is applicable to operational equipment, such as transformers, for each piece of equipment with an oil	Spill prevention and response measures are required as a core BMP under the 2021 MSGP.



BMP Number	BMP Title	BMP	Notes
		storage capacity of 55 gallons or greater. Underground storage tanks storing heating oil are also included.	
C-5	Erosion and Sedimentation Controls (Core BMP)	<p>The following procedures apply:</p> <ul style="list-style-type: none"> <li>-Inspect possible areas of erosion regularly. Recommend stormwater control studies and stormwater structural or procedural controls as needed.</li> <li>-Use SWPPP Tables E-1 and G-1 to document quarterly and annual inspections of areas of excessive erosion. Appendices E and G provide inspection details.</li> </ul> <p>Inspect the waterfall at the cliff behind the north end of 290 in quarterly and annual inspections. The cliff is experiencing significant erosion.</p> <ul style="list-style-type: none"> <li>-Follow the practices for controlling erosion from new construction that are included in Appendix D.</li> </ul>	<p>The 2021 MSGP requires that the SWPPP identify areas of the facility that have the potential for erosion and implement BMPs to control that erosion.</p> <p>Although the outfalls along the shoreline and the shoreline itself need to be inspected as part of the CSI, erosion along the shore that is not due to stormwater run-off should not be addressed in the SWPPP BMPs.</p> <p>Although not required by the 2021 MSGP, consider erosion prevention measures south of Building 77 and at the cliff behind 290. These two areas could eventually effect operations and facilities. Could take periodic photographs to monitor the erosion.</p>
C-6	Management of Run-off (Core BMP)	<p>Permanent structural run-off management measures in use at NAVMAG Indian Island include oil/water separators, retention ponds, catch basins, riprap, and bio filtration swales.</p> <p>See specific structural BMPs for a list of run-off management control structures.</p>	The 2021 MSGP requires that stormwater runoff management include practices such as permanent structural BMPs.
C-7	Salt Storage (salt and sand)	If salt is used at NAVMAG Indian Island for ice control, it will be stored to minimize contact with stormwater. Store bulk road deicing materials in a covered area, or use tarps to prevent exposure to rainfall. Store sidewalk-deicing material in closed containers. Consider alternatives to traditional salt such as calcium chloride, magnesium chloride, potassium chloride, and calcium magnesium acetate. Control measures including covering piles must be described and implemented through the SWPPP.	Winter Road and Sidewalk Safety (Salt and Sand).
C-8	Sector Specific	See sector specific BMPs.	Non-numeric Effluent Limits.
C-9	Employee Training (Core BMP)	NAVMAG Indian Island will train employees who work in areas where industrial materials or activities are exposed to stormwater, and employees who are responsible for implementing activities identified in the SWPPP (e.g., inspectors, maintenance people) as necessary. Training will focus on the components and goals of the SWPPP. Training will be conducted on an annual basis. Appendix I contains guidance to help develop the training.	<p>Employee training is required as a core BMP under the 2021 MSGP.</p> <p>Training is conducted annually in-person at the annual environmental awareness training. Other training may be conducted for specific areas or work processes of concern as needed.</p> <p>This training may be formal or relayed informally through meetings, phone</p>

BMP Number	BMP Title	BMP	Notes
			calls, e-mails, posters, pamphlets, or intranet.
C-10	Non-Stormwater Discharges	See 2021 MSGP Section 1.2.2 for a list of non-stormwater discharges authorized by this permit. See Section 3.3, Non-Stormwater Discharges, of the SWPPP. See BMPs K-1, K-2, K-3, K-4, K-5, F-1, F-2, F-3, and F-4, which are applicable to non-stormwater discharges.	Permittees must eliminate non-stormwater discharges not authorized by an NPDES permit.
C-11	Waste, Garbage and Floatable Debris	See C-1, C-2, P-1, and Q-1 for good housekeeping BMPs. This is the primary means used by NAVMAG Indian Island to prevent waste, garbage, and floatable debris from entering receiving waters.	Permittees must ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged.
C-12	Generation of dust - Vehicle Tracking of Industrial Materials	See BMPs F-3, F-4, and S-7 for specific BMPs related to this issue.	Permittees must minimize generation of dust and off-site tracking of raw, final, or waste materials.
F-1	289, Boat Ramp Boom and Rubber Fender Cleaning	The following restrictions apply: Only use potable water in the pressure washer. Do not use detergents, soaps, disinfectants, or solvents. Booms and Rubber Fenders that were oil or otherwise contaminated cannot be washed in this area. During the washing operation, periodically check the adjacent surface water for discoloration caused by the washing process. Stop the process if discoloration is observed. Contact the Environmental office if discoloration is observed.	This BMP applies to removal of sea growth from oil containment booms and Rubber Fenders staged on this facility.
F-2	Non-Stormwater Discharges	See BMPs K-1, K-2, K-3, K-4, and K-5 applicable to non-stormwater discharges.	See specific BMPs.

BMP Number	BMP Title	BMP	Notes
F-3	e300 , Pre-Wash Facility	<p>The intent of the Pre-Wash Facility is to remove bulk material prior to washing at the vehicle wash pad (Facility 185). The following restrictions apply:</p> <p>Examine the area prior to pre-washing for the following:</p> <ul style="list-style-type: none"> <li>-Ensure the area is adequately graveled so rainwater run-off and/or wash water will not transport dirt/debris off-site (beyond the boundaries of the Pre-Wash Facility). The gravel in the vehicle wash pad must be cleaned and or replenished periodically;</li> <li>-Check for signs that dirt/debris from previous washings was transported off-site. Check the drainage ditch for dirt/debris as well as the road; and</li> <li>-Look for stains indicating that grease, fuels, or paint chips were released during a previous pre-wash</li> </ul> <p>If any one of the above requirements is not met, pre-washing cannot occur. Correct the problem prior to further pre-washing. Then:</p> <ul style="list-style-type: none"> <li>-Use only potable water to minimize water usage use of a pressure washer is acceptable;</li> <li>-Do not use detergents or any other additives to assist in the pre-wash;</li> <li>-Avoid pre-washing areas on the equipment that could release fuels or greases;</li> <li>-Minimize use of the Pre-Wash Facility to only those vehicles and equipment that have significant build-up of dirt/debris. Vehicles and equipment with minor quantities of dirt/debris must go directly to the vehicle wash pad at 185; and</li> <li>-No vehicle and equipment maintenance of any kind is allowed at the Pre-Wash Facility.</li> </ul>	This BMP applies to removal of bulk dirt, mud, and organic debris (e.g., grass) that may accumulate on vehicles and equipment.
F-4	Building 90 Vessel Rinse	<p>The following restrictions apply: Examine the hull and motor prior to rinsing.</p> <p>Make sure:</p> <ul style="list-style-type: none"> <li>-The hull and motor are not contaminated with fuel, oil, or grease that would be removed during the rinse. If contamination is observed, rinse the hull and motor at Building 185 Wash Pad; and</li> <li>-That bottom paint, if applicable, will not be removed during the rinse process. Contact the Environmental Office if bottom paint is in disrepair.</li> <li>-Only use only potable water to rinse vessels.</li> <li>-Only use potable water and Salt-Away to rinse outboard motor cooling system.</li> <li>-Avoid rinsing areas on the vessel that could release fuels or greases.</li> <li>-Vessels may be rinsed on the driveway to the northeast of Building 90. Rinse water infiltrates completely and does not flow into the catch basin.</li> </ul>	This BMP applies to rinsing salt water and minor debris (e.g., seaweed) from vessel hulls and from internal parts of the outboard motor salt water-cooling system in the designated area behind Building 90.
F-5	Building 90 Vessel Drying	There are floor drains located in the north and south bays of Building 90. Both of these floor drains are plugged. Drips from vessels that have been rinsed, dry off the floor by evaporation.	This BMP applies to vessels that are brought inside Building 90 to dry.
F-6	Fill Depot control (east of 1019)	<p>The Fill Depot has a locked cable gate across the entrance.</p> <p>Environmental is in control of the key.</p> <p>Only clean fill may be placed at this site.</p>	This BMP applies to the procedures and allowed materials that may be placed in this fill depot.
F-7	Crane Testing at s77	<p>The following procedures apply:</p> <ul style="list-style-type: none"> <li>-Weights must be stored at least 20 feet from CB-020;</li> <li>-Testing must be done at least 20 feet from CB-020;</li> <li>-When testing is concluded, the area must be cleared of debris and any drips must be cleaned off the pavement.</li> </ul>	Crane testing weights need to be stored away from CB-20. The crane testing process needs to be located away from CB-20.

BMP Number	BMP Title	BMP	Notes
S-1	800, Truck Processing Center	There is a retention pond located north of this facility. It serves the large associated parking area. A spill kit must be located at this area.	This pond provides increased stormwater infiltration and protection against runoff.
S-2	Storage 825 (Lot 7)	Two retention ponds serve the facility. They are located to the east and west of the facility. Reforestation of the non-developed parts of the site was attempted as an additional land use enhancement, with potential positive stormwater impacts.	This pond provides increased stormwater infiltration and protection against runoff.
S-3	Catch Basins	The following procedures apply: Clean the catch basins on a regular basis; Clean the stormwater piping at outfalls where benchmarks have been exceeded.	Many catch basins have sumps to retain sediment/debris.
S-4	986, Pier Cargo Staging Area	The following procedures apply: Do not stage any materials or equipment near the curb cut outfall; Do not store any materials or equipment along the south edge of the staging area; Put all trash and recycle containers under the cover of 955; Remove all old or unused equipment from under 955 and off of the staging area 986; Store equipment as far north as possible; and Clean all spills ASAP.	A new bio-retention stormwater treatment system was constructed in Feb 2014. Runoff primarily sheet flows to the pond and infiltrates. Any overflow from the pond drains to the adjacent beach and infiltrates. Visual inspections occurred from Feb through May 2014 and no runoff was observed flowing to Pt. Townsend Bay.
S-5	Truck Holding Yards (Lots 1-8)	Some of these facilities employ bio swales to enhance stormwater quality.	These swales provide increased stormwater infiltration and protection against runoff.
S-6	Former Truck Processing Center 983	While this facility is not currently in use, there is a small retention pond associated with it. It collects stormwater from the pavement adjacent to the building. Maintain the riprap.	This pond provides increased stormwater infiltration and protection against runoff.
S-7	Mud Track-out 90, e77, w63, Fill Depot (east of 1019), 70, and e918	Monitor the following locations for mud and track out issues: Building 90: Install gravel or crushed rock in the area where vessel rinsing takes place and on the dirt drive way leading to the vessel rinsing area. The parking area and the shoulder alongside the inside curve are also causing soil to enter the CB-060A. Building n77: Install gravel or crushed rock in the south of Building 77 where trucks can track sediments out onto the pavement. Building n63: Install gravel or crushed rock in the new storage lot next to Building 63 to prevent trucks from tracking sediments out onto the pavement. Fill Depot: Install gravel or crushed rock in the entry to the Fill Depot. Building n918: Replenish traffic areas with crushed rock as needed. Building 70: Replenish traffic areas with crushed rock as needed.	Port Ops staff states that the mud track-out problem has been resolved with the addition of gravel. The area around Building 90 is the most critical track out issue because it is adjacent to CB-060 and along the water. CB-060 goes directly to SW-060, which has had Benchmark exceedances, though installation of the LID biofilter in Nov 2012 has resulted in reduction in some of the numbers.
S-8	Stormwater Isolation valve, 300	The following procedures apply: The stormwater drainage isolation valve is kept in the closed position at all times. The Environmental Division personnel monitor the collection basin. When the basin gets too full of water, the valve is opened to allow the water to drain. The collection basin will be drained before it reaches the overflow bypass level. The water in the collection basin will be visually assessed prior to allowing the water to drain.	Drainage isolation valve.

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BMP Number	BMP Title	BMP	Notes
P-1	Good Housekeeping Measures	See BMPs P-1 a) through P-1 e).	The 2021 MSGP requires implementation of good housekeeping practices.
P-1(a)	Vehicle and Equipment Storage Areas	Confine the storage of leaky or leak-prone vehicles/equipment awaiting maintenance to areas designated in SWPPP Table 3-8. Use the following measures: Place drip pans under vehicles/equipment, indoor storage of vehicles and equipment, Install berms or dikes, Use absorbents to clean spills, Use roofing or covered storage areas, and Clean pavement surfaces to remove oil and grease.	The 2021 MSGP requires implementation of good housekeeping practices.
P-1(b)	Fueling Areas	Prevent or minimize contamination of stormwater run-off from the fueling station. The fueling station is covered and the drainage from the fueling area goes to the oil water separator at the wash pad, which goes to the sanitary sewer.	The 2021 MSGP requires implementation of good housekeeping practices.
P-1(c)	Material Storage Areas	Maintain material storage vessels (for used oil/oil filters, spent solvents, paint wastes, hydraulic fluids) to prevent contamination of stormwater and plainly label them (e.g., Used Oil, Spent Solvents, etc.). Store all materials indoors as much as possible. Install berms/dikes around storage areas as necessary. Use dry cleanup methods.	The 2021 MSGP requires implementation of good housekeeping practices.
P-1(d)	Vehicle and Equipment Cleaning Areas	Vehicles and equipment will be cleaned at the Fueling Station (185) Wash Pad per the following restrictions: Pre-washing of bulk dirt/debris can occur at the Pre-Wash Facility n300e if done in accordance with BMP F-3. Keep all over spray on the Wash Pad. Use of soap is permitted (soap provided by wash pad users). Wash pad users will provide a label on the soap container. Post a vehicle wash pad procedure at the vehicle wash pad as needed Fire truck/equipment may be washed in Fire House (Facility 301) designed for that purpose.	The 2021 MSGP requires implementation of good housekeeping practices.
P-1(e)	Vehicle and Equipment Maintenance Areas	Perform maintenance activities as much as possible indoors. Cranes and other larger equipment may be maintained outdoors. Use drip pans when necessary. Minimize run-on/run-off of stormwater to maintenance areas.	The 2021 MSGP requires implementation of good housekeeping practices.
P-2	Employee Training	See C-9 for details. Sector specific training will be conducted as needed. Address the following activities, as applicable: Used oil and spent solvent management; Fueling procedures; General good housekeeping practices; Proper painting procedures; Used battery management; Material storage; Vehicle washing; and Recycling.	Train personnel at least once a year.

BMP Number	BMP Title	BMP	Notes
P-3	Salt Storage (salt and sand)	See BMP C-7.	
Q-1	Good Housekeeping Measures	See BMPs Q-1 (a) through (e).	The 2021 MSGP requires implementation of good housekeeping practices.
Q-1(a)	Vessel Pressure Washing	Pressure washing to remove marine growth from vessels is only allowed at the vehicle wash pad (Building 185). Rinsing residual salt water from vessels using potable water is allowed at the facility on the east side of Building 90. Pressure washing at this facility is not allowed.	The 2021 MSGP requires implementation of good housekeeping practices.
Q-1(b)	Blasting and Painting	Vessel blasting is not allowed. Over water vessel touch-up painting is not allowed.	The 2021 MSGP requires implementation of good housekeeping practices.
Q-1(c)	Materials Storage Areas	Store all containerized materials, with a potential to spill (e.g., paints, fuels, waste oil, antifreeze, batteries, solvents) in a protected, secure location away from drains.	The 2021 MSGP requires implementation of good housekeeping practices.
Q-1(d)	Engine Maintenance and Repair Areas	Conduct small marine engine maintenance and repairs indoors or under cover and isolated from stormwater. Engine flushing using potable water is allowed at the vehicle wash pad (Building 185). Only four-cycle engines may be rinsed with potable water to remove residual salt water, at the Building 90 rinse area.	The 2021 MSGP requires implementation of good housekeeping practices.
Q-1(e)	Material Handling Area	Minimize the contamination of precipitation or surface run-off from material handling operations and areas (e.g., fueling, paint and solvent mixing, disposal of process wastewater streams from vessels).	The 2021 MSGP requires implementation of good housekeeping practices.
Q-2	Employee Training	See C-9 for details. Sector specific training will be conducted as needed. Address the following activities, as applicable: Used oil and Spent solvent management Disposal of spent abrasives and vessel wastewaters Spill prevention and control Fueling procedures General good housekeeping practices Painting and blasting procedures Used battery management Material storage Vehicle washing Recycling	Train personnel at least once a year.
Q-3	Preventive Maintenance	See BMP C-3 and Section 6 of the SWPPP for maintenance and inspection requirements.	As part of the preventive maintenance program, perform timely inspection

BMP Number	BMP Title	BMP	Notes
		This includes cleaning oil/water separators and sediment traps to ensure that spent abrasives, paint chips, and solids will be intercepted and retained prior to entering the storm drainage system, as well as inspecting and testing facility equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters.	and maintenance of stormwater management devices.
Q-4	General Yard Area	Keep the Ammunition Wharf (Facility 832), and Pier Cargo Staging Area (986) clean to minimize stormwater pollution. Remove from the general yard area: scrap metal, wood, plastic, miscellaneous trash, paper, glass, industrial scrap, insulation, welding rods, packaging, etc. This BMP is currently implemented at NAVMAG Indian Island. Reference to the temporary storage of mobile cranes in n918 lot was deleted because the area is no longer used to park cranes.	
K-1	Landscape Watering	Pesticides, herbicides, and fertilizers are applied in accordance with manufacturer's instructions.	Limited landscape watering may occur at the main gate area and at the Administration Building, 69.
K-2	Pavement Rinse Waters	The following procedures apply: Remove trash/litter prior to rinse. Do not use detergents. Do not wash areas where spills have occurred unless all spilled material has been removed. Use of power washing is permitted as long as paint does not chip away.	The Ammunition Wharf, the Wharf utility ducts, and pier 218 are rinsed occasionally using potable water to remove bird and otter waste, accumulated shells left by the gulls, and dirt. Other pavements (roads, parking lots) are not typically washed.
K-3	Routine External Building Wash Downs	Examine building prior to washing checking for: -Staining not from a known source (e.g., staining under a vent should be investigated prior to washing) -Chipping/peeling paint that would release into the wash water -Asbestos siding Do not use detergents or disinfectants in the washing process. Use of a power washer is permitted as long as paint does not chip away.	Buildings are occasionally washed (using either a pressure washer or hose) to remove dirt, debris, and mildew/mold. This is not a common/routine practice at NAVMAG Indian Island.
K-4	Pier-side Vessel Deck Rinsing	The following procedures apply: -Remove trash/litter prior to rinsing. -Do not use detergents. -Do not wash areas where spills have occurred unless all spilled material has been removed.	Vessel decks are rinsed occasionally using potable water to remove salt water, bird and otter waste, accumulated shells left by the gulls, and dirt.
K-5	Mower Blade Rinsing, Building 70	The following procedures apply: -Potable water may be used to rinse vegetation clippings off the blades of mowing equipment. -No pressure washing is allowed. -Rinsing must be conducted on a vegetated surface at a location where the vegetative clippings will not enter the stormwater. -Vegetative clippings area disposed of off-site by the grounds keeping contractor.	

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## 4.2 Facilities and Applicable BMPs

Table 4-2 lists each of the sector P and Q facilities and their associated site specific BMPs. All the facilities are covered by the Core BMPs C-1 through C-12. All facilities are covered by K-1 through K-5 non-stormwater discharge BMPs. Although all catch basins are covered by BMP S-3, the locations noted below are of particular concern because they are located near the water.

**Table 4-2 Facilities and Applicable BMPs**

Building #	Building Name	Sector	Facility BMP	Structural BMP
62		P		
70		P	K-5	
77		P		S-7
84		P		S-3
90		Q	F-4 F-5	S-3, S-7
T90		Q		S-3
132		Q		
162		P		
185		P		S-3
218		Q	K-4, K-2	
263		P		
289		Q	F-1	
290		P, Q		
300		P		S-3, S-8
800		P		S-1
821		P		S-2
825 <sup>3</sup>		P		S-2
826		P		S-5
827		P		S-5
828		P		S-5
829		P		S-5
830		P		S-5
831		P		S-5
832		Q	K-4, K-2	
833		Q		

<sup>3</sup>Located near Building 38. Also known as Lot 7.

Building #	Building Name	Sector	Facility BMP	Structural BMP
834		Q		
837		P		
955		Q		
983		P		S-6
986		Q		S-4
1019-1025		P		
1030		P		
w63*		P		S-7
e77*		P		S-7
s77*		P & Q	F-7	S-3
e300*		P	F-3	
n185*		P, Q		
e187/924*		P		S-3
w300*		P		
e918*		P		S-7
e1019		P	F-6	S-7

**Notes:**

1. \*These are designated storage/laydown/parking areas.
2. The “n, s, e, or w” prefix indicates the area is nearby and north, south, east, or west of the numbered facility.
3. Sector P: Land Transportation and Warehousing
4. Sector Q: Water Transportation

## 5 Analytical Monitoring

### 5.1 Analytical Monitoring Requirements

NAVMAG Indian Island must collect and analyze stormwater samples and document monitoring activities consistent with the procedures described in 2021 MSGP Part 4 and Appendix B, Subsections 10-12.

Quarterly monitoring must be performed on a storm event that results in an actual discharge from the facility (“measurable storm event”) that follows the preceding measurable storm event by at least 72 hours (3 days). Samples must be collected within the first 30 minutes of a measurable storm event. Deviations from these requirements must be documented. Quarterly analytical monitoring requirements began in the first full quarter following the date of discharge authorization under the 2021 MSGP.

All required analytical monitoring must be conducted in accordance with the procedures described in 2021 MSGP, Appendix B, Subsection 10.D (40 CFR Part 136). See Table 5-1 for a summary of the quarterly analytical monitoring requirements.

**Table 5-1: Quarterly Monitoring Requirements**

Analyte	Outfall SW-020	Outfall SW-040	Outfall SW-060
Aluminum	Quarterly	-	Quarterly
Lead	Quarterly	-	Quarterly
Zinc	Quarterly	-	Quarterly
COD	Quarterly	Quarterly	-
TSS	Quarterly	Quarterly	-
pH	Quarterly	Quarterly	-

Aluminum, Lead, and Zinc are to be Total Recoverable analyses.

#### 5.1.1 Required Outfall Monitoring Locations

See Appendix A, Figure A-2 for outfall locations shown on a map. See Table 2-3 for a complete list of outfalls, outfall GPS locations, and physical description.

Table 5-2 lists the outfalls at which benchmark monitoring was conducted. See SWPPP Section 5.3 for sampling and analysis procedures.

The outfalls that must be monitored and the frequency of monitoring depend on the type of monitoring. In the sections below, the requirements for each type of monitoring are described.

#### 5.1.2 Benchmark and Indicator Monitoring

2021 MSGP Part 4.2 gives the requirements for benchmark and indicator monitoring. The latest general permit coverage began in July 2015. The first quarterly sample is to be collected in the first full quarter following the quarter that NAVMAG Indian Island is granted permit coverage.

Quarterly benchmark monitoring must be conducted for the first four full quarters of permit coverage. After collection of four quarterly samples, if the average of the four monitoring values for any parameter does not exceed the benchmark, the benchmark monitoring requirements for that parameter are fulfilled until the beginning of the fourth year of permit coverage. In the fourth year of permit coverage the full benchmark monitoring must be repeated and averages recalculated to discontinue following the fourth year. See 2021 MSGP Part 4.2.2.3 for details concerning the calculation of the average and for details concerning what to do if the average exceeds the benchmark.

Indicator monitoring must be conducted quarterly for the entirety of permit coverage. Indicator monitoring is report-only and is neither benchmark monitoring nor an effluent limitation.

Table 5-2 lists the outfalls at which benchmark monitoring must be conducted.

**Table 5-2: Bench Mark/Indicator Monitoring Locations**

<b>Outfall or Catch Basin #</b>	<b>Sector Association</b>	<b>Collection Point Description</b>
SW-020 or CB-020A	P & Q	See Table 2-3
SW-040 or upstream manhole	P	See Table 2-3
SW-060 or CB-060A	Q	See Table 2-3

See SWPPP Section 5.3 for sampling and analysis procedures.

### 5.1.3 Effluent Limitations Guidelines Monitoring

The 2021 MSGP gives the requirements for monitoring based on effluent guidelines. Effluent guideline monitoring is required for processes listed in 2021 MSGP Table 2-1. None of the processes listed in Table 2-1 are conducted at NAVMAG Indian Island, so this type of monitoring is not required at NAVMAG Indian Island.

### 5.1.4 State or Tribal Specific Monitoring

2021 MSGP Parts 2.2.2 and 9.10.7 give the additional requirements for monitoring specified by Washington State or Tribal agreements. These additional requirements include sampling and effluent limits for discharges to certain impaired waters and Puget Sound Sediment Cleanup Sites.

### 5.1.5 Impaired Water Monitoring

2021 MSGP Part 4.2.4 gives the requirements for facilities that discharge to an impaired water body. It states that, "Beginning in the first full quarter following May 30, 2021 or your date of discharge authorization, whichever date comes later, you must monitor all pollutants for which the waterbody is impaired and for which a standard analytical method exists (see 40 CFR 136) once per

year at each outfall (except substantially identical outfalls) discharging stormwater to impaired waters without an EPA-approved or established Total Maximum Daily Load (TMDL).”

2021 MSGP Part 9.10.7 includes requirements for federal operators in the State of Washington. Part 9.10.7.2.d requires quarterly monitoring for impairments if the outfall discharges to a receiving water listed on the EPA approved 303(d) list that is a Category 5 or 4 impairment area. Part 9.10.7.2.e requires compliance with applicable TMDLs where the receiving water has an approved TMDL.

SWPPP Section 2.3.4 discusses impaired water bodies near NAVMAG Indian Island, and points to fecal coliform as being responsible for the single area being classified as a Category 5 impaired water body. However, because none of the NAVMAG outfalls discharge into the impaired water grid, sampling is not required.

## 5.2 Summary of Sampling and Analysis

The SWPPP must include a summary of analytical sampling data collected during the term of the permit. Sampling data must be maintained for a period of at least three years after coverage under the permit expires or is terminated.

Table 5-4 is a summary of quarterly stormwater sampling and analysis done at NAVMAG Indian Island per the 2015 MSGP from 2017 to 2018. The analyses were done for Total Metals.

The data was evaluated based on Sector Q Water Transportation benchmark values for aluminum, iron, lead, and zinc. The 2015 MSGP only required benchmark monitoring (and provides associated benchmark values) for Sector Q associated facilities. Benchmark monitoring was not required for Sector P associated facilities. State of Washington Water Quality Standards (WQS) Chapter 173-201A addresses zinc and lead. It should be noted that WQSs are not directly applicable to a specific stormwater discharge/outfall. WQSs apply to a water-body as a whole and are designed to help ensure designated uses (which might include drinking water, irrigation, fishing, and/or recreation) are achieved. EPA’s benchmark values are reasonably in line with State of WQSs. Zinc and lead are, as defined by EPA, priority pollutants.

WQSs do not address aluminum or iron and these metals are not EPA defined priority pollutants. EPA does recommend water quality criteria for aluminum and iron. These recommendations are only for fresh water. Therefore, sampling results that may exceed benchmark values for aluminum and iron may not indicate a potential negative impact to marine water quality. As such, aluminum and iron results will be given lower priority in terms of potential implementation of BMPs designed to lower aluminum and/or iron concentrations.

In 2012 a bio-filtration catch basin vault was installed at SW-060 to address the Benchmark exceedances. Also in 2012, in this same area a stormwater swale and culvert were constructed to prevent stormwater from pooling in an area where traffic was tracking mud toward SW-060. The filtration media in this vault was replaced with oyster shells in 2021.

At SW-120 a stormwater infiltration pond was designed in 2012 and constructed in February 2014. This pond infiltrates all of the stormwater from SW-120, thus eliminating the outfall.

In March of 2014 a stormwater pond was installed to the south of building 77. This pond eliminated outfall SW-030 and its associated catch basins. The outlet of the stormwater pond is through CB-020B, which discharges to CB-020A and then to outfall SW020.

**Table 5-3: Quarterly Stormwater Analytical Monitoring Results 2017-2018**

Outfall / Sample ID	Analyte	Test Method	Benchmark	1st Qtr 17	2nd Qtr 17	3rd Qtr 17	4th Qtr 17	2017 Avg	1st Qtr 18	4 Qtr Avg	2nd Qtr 18	3rd Qtr 18	4th Qtr 18	SW-060 Zn 4 Qtr Avg	
SW-020	Aluminum	EPA 200.7	750 µg/L	603.000	60.900	NF	118.000	260.633	78.800	215.175	NFT	NFT	NFT		
SW-020	Iron	EPA 200.7	1000 µg/L	806.000	206.000	NF	677.000	563.000	51.400	435.100	NFT	NFT	NFT		
SW-020	Lead	EPA 200.7	210 µg/L	4.270	0.707	NF	0.782	1.920	0.787	1.637	NFT	NFT	NFT		
SW-020	Zinc	EPA 200.7	90 µg/L	28.800	0.000	NF	5.330	11.377	5.650	9.945	NFT	NFT	NFT		
SW-060	Aluminum	EPA 200.7	750 µg/L	537.000	145.000	410.000	81.700	293.425	NFT		NFT	NFT	NFT		
SW-060	Iron	EPA 200.7	1000 µg/L	740.000	205.000	474.000	169.000	397.000	NFT		NFT	NFT	NFT		
SW-060	Lead	EPA 200.7	210 µg/L	1.950	0.777	2.310	0.814	1.463	NFT		NFT	NFT	NFT		
SW-060	Zinc	EPA 200.7	90 µg/L	28.600	178.000	178.000	73.000	114.400	61.000		NF	154.000	49.700	84.425	NFT
NFT = No Further Testing		NF = No Flow													

Notes:

1. Light green shading are results below benchmarks. Orange shading are results or annual quarterly averages above benchmarks.

## 5.3 Sampling and Analysis Procedures

See Appendix H for the Benchmark, Indicator, and Impaired Waters monitoring procedures as well as procedures for documenting deviations from the required monitoring. Corrective actions arising from analytical monitoring results will be addressed as outlined in Section 7.3 (2021 MSGP Part 5.2).

## 5.4 Reporting and Documentation

Monitoring data must be reported using EPA's electronic NetDMR tool at [www.epa.gov/netdmr](http://www.epa.gov/netdmr), as described in 2021 MSGP Part 7.3. Reporting procedures for analytical monitoring are included in SWPPP, Appendix H. Tracking for all kinds of reporting is included in Appendix L.

Report monitoring data to EPA as follows: (2021 MSGP Part 7.3)

- All monitoring data collected pursuant to 2021 MSGP Part 4 must be submitted to EPA no later than 30 days after you have received your complete laboratory results for all monitoring outfalls for the reporting period. Your monitoring requirements (i.e., parameters required to be monitored and sample frequency) will be prepopulated on your electronic Discharge Monitoring Report (DMR) form based on the information you reported on your NOI form (through the NDPES eReporting tool (NeT)). Accordingly, the following changes to your monitoring frequency must be reported to EPA through the submittal of a "Change NOI" form in NeT, which will trigger changes to your monitoring requirements in NetDMR:
- For benchmark monitoring, note that sampling results must be submitted to EPA no later than 30 days after receiving laboratory results for each required sampling event. If multiple samples are collected in a single sampling period (e.g., due to adverse weather conditions, climates with irregular stormwater runoff, or areas subject to snow), submit all sampling results to EPA within 30 days of receiving the laboratory results.

## **6 Inspections**

### **6.1 Summary of Past Inspections**

Per the 2015 MSGP, quarterly inspections were performed for Water Transportation (Sector Q) facilities and Land Transportation and Warehousing sector (Sector P) and their adjacent areas. The summary of these inspections were included in past annual reports.

### **6.2 2021 MSGP Stormwater Inspection Requirements**

#### **6.2.1 Quarterly Routine Facility Inspections**

Per 2021 MSGP Part 3.1, routine facility inspections are required of all areas of the facility where industrial materials or activities are exposed to stormwater, and of all stormwater control measures (BMPs) used to comply with the effluent limits contained in the permit. Routine facility inspections must be conducted quarterly at NAVMAG Indian Island. Inspections must be done during periods when the facility is in operation. The inspections must be conducted by qualified personnel with at least one member of the stormwater pollution prevention team participating. At least once each calendar year, the routine facility inspection must be conducted during a period when a stormwater discharge is occurring.

See SWPPP, Appendix E for the procedures for conducting Routine Facility Inspections.

#### **6.2.2 Quarterly Visual Assessment of Stormwater Discharges**

Visual assessment is collection of a stormwater sample for on-site physical/visual examination for signs of pollution. This may include observation for discoloration, odor, sheen, solids, etc.

Per 2021 MSGP Part 3.2, once each quarter for the entire permit term, the facility must collect a stormwater sample from each outfall and conduct a visual assessment of each of these samples. The facility may choose to sample only one outfall from each essentially identical group of outfalls.

These samples are not required to be collected consistent with 40 CFR Part 136 procedures, but should be collected in such a manner that the samples are representative of the stormwater discharge.

See Appendix F for the procedures for conducting the Quarterly Visual Assessment of Stormwater. See Appendix F Table F-1 for outfalls that require Quarterly Visual Assessment.

#### **6.2.3 Inspection/Assessment Documentation**

Routine facility inspections must include the documentation required in the 2021 MSGP Part 3.1.6. Visual assessments must include the documentation required in 2021 MSGP Part 3.2.3. Findings and results from the quarterly inspections/assessments must be documented and maintained with the SWPPP as required in 2021 MSGP Part 6.5. The findings and results of quarterly inspections/assessments must be summarized in the annual report per 2021 MSGP Part 7.4.



## **7 Corrective Actions, Reporting, and Recordkeeping**

The need for corrective actions will typically be discovered through routine monitoring, quarterly inspections, quarterly visual assessment, spill or leak events, equipment upsets, structural control measure maintenance problems, etc.

2021 MSGP Part 5 describes the requirements for corrective actions.

### **7.1 Condition Requiring Review and Revision to Eliminate Problems**

If any of the following conditions occur, review and revise the selection, design, installation, and implementation of any control measures to ensure that the condition is eliminated and will not be repeated in the future:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit) occurs at the facility;
- A discharge violates a numeric effluent limit;
- Existing stormwater control measures are not stringent enough for the stormwater discharge to meet applicable water quality standards;
- An inspection reveals that a control measure was never installed, was installed incorrectly, or not in accordance with the requirements of the 2021 MSGP or is not being properly operated or maintained; or
- Quarterly visual assessments show evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).

### **7.2 Conditions Requiring Review to Determine if Modifications Are Necessary**

If any of the following conditions occur, review the selection, design, installation, and implementation of control measures to determine if modifications are necessary to meet the effluent limits in this permit:

- Construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged.

### **7.3 Additional Implementation Measures (AIM) for monitoring results**

If during monitoring an annual average exceeds an applicable benchmark threshold based on the following events, the AIM requirements have been triggered for that benchmark parameter:

- The four-quarter annual average for a parameter exceeds the benchmark threshold, or
- Fewer than four quarterly samples are collected, but a single sample of sum of any sample results within the sample year exceeds the benchmark threshold by more than four times the parameter.

There are three AIM levels: AIM 1, AIM 2 and AIM 3. Response per 2021 MSGP Part 5.2 to different AIM levels which prescribe sequential and increasingly robust responses when a

benchmark exceedance occurs. The AIM level responses of and deadlines are prescribed in 2021 MSGP Parts 5.2.1, 5.2.2, and 5.2.3.

## 7.4 Corrective Action Deadlines

- Immediately take all reasonable steps to minimize or prevent discharge of pollutants until a permanent solution is found, including cleaning up any contaminated surfaces so that the material will not discharge in subsequent storm events.
- If additional actions are necessary, these actions must be complete before the next storm event if possible, and within 14 calendar days from the discovery of the corrective action condition. If infeasible to complete the corrective action in this timeframe, it must be documented why it is infeasible along with a schedule of completing the work, which must be done as soon as practicable after the 14-day timeframe but no longer than 45 days following discovery.
- If the time to complete corrective actions will exceed 45 days, then the EPA Regional Office must be contacted with the intention to exceed the 45-day timeframe, the rationale for an extension, the expected completion date, which must be included in corrective action documentation.
- Within 14 days calendar days of completing the corrective action work, this SWPPP must be modified if there were any modifications to the stormwater controls.

Specific documentation required within 24 hours and 14 days is detailed in SWPPP Section 7.5. If you determine that changes are necessary following your review, any modifications to your control measures must be made before the next storm event if possible, or as soon as practicable following that storm event. These time intervals are not grace periods, but are schedules considered reasonable for documenting your findings and for making repairs and improvements. They are included in the 2021 MSGP to ensure that the conditions prompting the need for these repairs and improvements are not allowed to persist indefinitely.

## 7.5 Corrective Action Documentation

The following information must be documented within 24 hours of discovery of any condition listed in SWPPP Section 7.1, 7.2, or 7.3:

- Description of the condition or event triggering the need for corrective action review and/or AIM response. For any spills or leaks, include the following information: a description of the incident including material, date/time, amount, location, and reason for spill, and any leaks, spills or other releases that resulted in discharges of pollutants to waters of U.S., through stormwater or otherwise;
- Date the condition/triggering event was identified;
- Description of immediate actions taken pursuant to 2021 MSGP Part 5.1.3.1 to minimize or prevent the discharge of pollutants. For any spills or leaks, include response actions, the date/time clean up complete, notifications made, and staff involved. Also include any measure taken to prevent the reoccurrence of such releases; and
- A statement signed and certified in accordance with 2021 MSGP Appendix B, Subsection 11.

The following information must be documented within 14 days of discovery of any condition listed in SWPPP Section 7.1, 7.2, and 7.3:

- Summary of corrective actions and/or AIM responses taken or to be taken as a result of the conditions listed in 2021 MSGP Parts 5.1.1, 5.2.3, 5.2.4, and/or 5.2.5;
- Date corrective action initiated, completed, or expected to be completed; and
- If applicable, document why it is infeasible to complete the corrective actions within the 14-day timeframe and document the alternate schedule.

You must submit this documentation in an annual report as required in 2021 MSGP Part 7.4 and retain a copy on-site with your SWPPP as required in 2021 MSGP Part 6.5.7.

## 7.6 NAVMAG Indian Island Corrective Action Tracking

NAVMAG Indian Island may use Appendix M, Form M-1, a combination of Appendix E, Forms E-1 through E-3 and Appendix M, Form M-2, or another method that complies with 2021 MSGP Part 5, to document and track corrective actions to include the requirements listed in SWPPP Sections 7.3 and 7.4. These forms may be used as living documents/records. They may be updated as new problems are discovered and corrective actions are completed. As such, changes to the entries in these forms will not be considered SWPPP revisions. The information recorded in these forms will be used to compile the required annual report to EPA.

## 7.7 Reporting and Record Keeping

### 7.7.1 Annual Report

An Annual Report must be submitted to the EPA via NeT-MSGP (unless granted a paper waiver) by January 30<sup>th</sup> for each year of permit coverage containing information generated from the past calendar year. The following information is to be included in the annual report:

- A summary of the past year's routine facility inspection documentation.
- A summary of the past year's visual assessment documentation.
- A summary of the past year's corrective action and any required AIM documentation, including status of any outstanding corrective action(s) or AIM responses. Also a description of any incidents of noncompliance in the past year or currently ongoing, or if none, a statement of compliance with the permit.
- A statement, signed and certified, in accordance with 2021 MSGP Appendix B, Subsection 11.

### 7.7.2 Reporting (2021 MSGP Part 7)

- Monitoring reports electronically using Net-DMR.
- Notice of Intent (NOI) and Change Notice of Intent (NOI) per NeT-MSGP (unless granted a paper waiver).
- 24-hour reporting for any noncompliance which may endanger health or the environment. (2021 MSGP Appendix B, subsection 12.F)

- 5-day follow up reporting to the 24-hour reporting (2021 MSGP Appendix B, Subsection 12.F)
- Reportable quantity spills (2021 MSGP Part 2.1.2.4)
- Prompt notice to the EPA no fewer than 30 days prior to making any planned changes in the permitted facility of activity that qualify the facility as a new source or that could significantly increase the quantity of pollutants discharged. (2021 MSGP Appendix B, Subsection 12.A)
- Anticipated noncompliance (2021 MSGP Appendix B, Subsection 12.B)
- Compliance schedules, other noncompliance and other information (2021 MSGP Appendix B, Subsections 12.F, 12.G, and 12.H)

### 7.7.3 Record Keeping (2021 MSGP Part 6.5)

The following inspection, monitoring, and certification records are to be kept with the SWPPP:

- A copy of the Notice of Intent (NOI) submitted to the EPA along with any correspondence exchanged with the EPA.
- A copy of the authorization email or letter received from the EPA assigning the NPDES ID.
- A copy of the 2021 MSGP.
- Documentation of any maintenance and repairs to stormwater control measures.
- All inspection reports, including routine facility inspection reports and visual assessment documentation.
- Description of any deviations from the schedule for visual assessments and/or monitoring.
- Corrective action documentation.
- Documentation of any benchmark threshold exceedances, which AIM level triggering event the exceedance caused and AIM response. The AIM response includes the AIM triggering event, the AIM response taken, any rationale that SWPPP/SCM changes were unnecessary, and any documentation required to meet any AIM exception.

## **8 References**

- 1) Multi Sector General Permit, March 2021 (2021 MSGP)
- 2) Environmental Protection Agency Letter dated April 15, 2011 (additional MSGP 2008 requirements)
- 3) NAVMAG Indian Island Integrated Natural Resource Management Plan, 2019 (INRMP)
- 4) Draft NAVMAG Indian Island Integrated Cultural Resources Management Plan, March 2006 (ICRMP)
- 5) NAVMAG Indian Island Oil and Hazardous Substance (OHS) Release Contingency and Response Plan (ICP)
- 6) NAVMAG Indian Island Oil Spill Prevention, Control, and Countermeasure Plan, January 2012 (SPCC Plan)

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## **APPENDIX A: FACILITY DRAWINGS**

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**Figure A-1: Stormwater Pollution Prevention Plan Site Map**

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**Figure A-2: Industrial Areas and Stormwater Outfalls**

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**Figure A-3: Ammunition Wharf Area and Stormwater Outfalls**

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**Figure A-4: Building 77 and Crane Test Areas**

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**Figure A-5: Public Works Area**

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**Figure A-6: Building 90 Port Operations Area**

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**Figure A-7: Building 300 Area**

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**Figure A-8: Buildings 832 and 833 Ammunition Wharf**

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**Figure A-9: Pier Cargo Staging Area 986 Bio-Retention Pond**

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**Figure A-10: Truck Storage Lots**

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**Figure A-11: Buildings 837, 838, and 1030**

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**Figure A-12: Visual Assessment and Monitoring Locations**

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**Figure A-13: GPS Coordinates**

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## **APPENDIX B: GLOSSARY OF TERMS**

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## Glossary of Terms

**Aeration:** A process that promotes biological degradation of organic matter. The process may be passive (as when waste is exposed to air) or active (as when a mixing or bubbling device introduces the air).

**Best Management Practice (BMP):** Schedule of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the United States. BMPs also include treatment requirements, operating procedures, and practices to control facility-site runoff; spillage or leaks; sludge or waste disposal; or drainage from raw material storage.

**Biochemical Oxygen Demand (BOD):** The amount of oxygen in water required by bacteria while stabilizing decomposable organic matter under aerobic conditions.

**Biodegradable:** The ability to break down or decompose under natural conditions and processes.

**Chemical Oxygen Demand (COD):** Measurement of the total quantity of oxygen required in water for the chemical oxidation of organic matter to carbon dioxide.

**Director:** Regional Administrator or an authorized representative of the EPA.

**Detention Basin:** A holding pond or reservoir used to store polluted runoff for a limited time and then release it.

**Hazardous Substance:** 1) Any material that poses a threat to human health and/or the environment. Hazardous substances can be toxic, corrosive, ignitable, explosive, or chemically reactive. 2) Any substance named required by EPA to be reported if a designated quantity of the substance is spilled in the waters of the United States or if otherwise emitted into the environment.

**Hazardous Waste:** By-products of human activities that can pose a substantial or potential hazard to human health or the environment when improperly managed. Possesses at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity), or appears on special EPA lists.

**Illicit Discharge:** Any discharge to a municipal separate storm sewer system that is not composed entirely of stormwater except discharges authorized by an NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges resulting from firefighting activities.

**Impervious surface:** A surface such as pavement or rooftops that prevents the infiltration of water into the soil.

**Leaching:** The process by which soluble constituents are dissolved in a solvent such as water and carried down through the soil.

**Retention Basin:** A pond or reservoir that hold runoff without release except by means of evaporation, infiltration, or emergency bypass.

**Run-on:** Stormwater surface flow or other surface flow that enters property other than where it originated.

**Sheetflow:** Runoff that flows over the ground surface as a thin, even layer, not concentrated in a channel. For purposes of this SWPPP, sheetflow areas are areas of industrial concern that do not drain to a point discharge, but drain by sheetflow directly to a receiving waterbody.

**Significant Materials:** Include, but are not limited to, raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); any chemical the facility is required to report pursuant to Section 313 of Title III of the Superfund Amendments and Reauthorization Act (SARA); fertilizers; pesticides; and waste products such as ashes, slag, and sludge that have a potential to be released with stormwater discharges [122.26(b)(12)].

**Significant Spills:** Includes, but is not limited to, releases of oil or hazardous substances in excess of reportable quantities under Section 311 of the Clean Water Act (CWA) (see 40 CFR 110.10 and CFR 117.21) or Section 102 of CERCLA (see 40 CFR 302.4).

**Waters of the United States:** (a) All waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters that are subject to the ebb and flow of the tide; (b) All interstate waters, including interstate wetlands; (c) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce including any such waters: (1) Which are or could be used by interstate or foreign travelers for recreational or other purposes; (2) From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or (3) Which are used or could be used for industrial purposes by industries in interstate commerce; (d) All impoundments of waters otherwise defined as waters of the United States under this definition; (e) Tributaries of waters identified in paragraphs (a) through (d) of this definition; (f) The territorial sea; and (g) Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (a) through (f) of this definition.

Waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of the CWA (other than cooling ponds as defined in 40 CFR 423.11(m) which also meet the criteria of this definition) are not waters of the United States. This exclusion applies only to man-made bodies of water that neither were originally created in waters of the United States (such as disposal in wetlands) nor resulted from the impoundment of waters of the United States.

**Wetlands:** An area that is regularly saturated by surface or groundwater and subsequently is characterized by a prevalence of vegetation that is adapted for life in saturated soil conditions. Examples include: swamps, bogs, fens, marshes, and estuaries.

## **APPENDIX C: 2021 MSGP, NOTICE OF INTENT, CRITERION C ELIGIBILITY FORM AND OFFICIAL LETTERS**

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Table C-1 shows the location where each type of record/report is kept.

**Table C-1: Summary of SWPPP Appendix C Contents**

<b>Record/Document</b>	<b>Record Location</b>
2021 MSGP	SWPPP, Appendix C and or Share Drive
Notice of Intent	SWPPP, Appendix C and or Share Drive
Criterion C Eligibility Form	SWPPP, Appendix C and or Share Drive
Official Letters	SWPPP, Appendix C and or Share Drive

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## **APPENDIX D: STORMWATER MANAGEMENT AT CONSTRUCTION ACTIVITIES**

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## **Stormwater Permitting at Construction Sites**

All construction sites disturbing one or more acres of land or smaller sites that are part of a common plan of development or sale will obtain permit coverage under the most current EPA NPDES General Permit for Discharges from Construction Activities.

In order to obtain permit coverage the contractor must prepare a Stormwater Pollution Prevention Plan (SWPPP) for the construction site and a Notice of Intent (NOI) must be filed with the EPA. The Navy must also submit an NOI per Navy procedures. Navy and contractor NOIs should be coordinated so that they agree. Information regarding the EPA General Permit for Discharges from Construction Activities at the EPA's website, <http://epa.gov/npdes/stormwater/-discharges-construction-activities#overview>.

### **Construction SWPPP**

The construction SWPPP must be completed before the NOI is filed and must include:

- A site description giving:
  - o Project description
  - o Sequence and timing of major soil disturbing activities
  - o Estimates of total site area and total area to be disturbed by clearing, grubbing, or excavating
- A site map indicating drainage patterns and anticipated slopes after grading and:
  - o Locations of disturbed and undisturbed areas
  - o Location of major structural and non-structural controls identified in the plan
  - o Locations where stabilization practices will occur
  - o Locations of offsite material, borrow, waste or equipment storage areas
  - o Surface waters and wetlands
  - o Locations of stormwater discharge
- Controls (BMPs) that will be implemented at the site for erosion and sediment control and pollution prevention.
- Sequencing of controls
- Describe which "operator" is responsible for implementing specific controls
- Description of procedures to ensure timely maintenance of controls
- Information on endangered species/critical habitat at the site and whether discharges or BMPs affect them,
- Certifications

- All contractors and subcontractors identified in the construction SWPPP as being responsible for implementing controls shall sign a certification that is included in the plan. The NAVBASE Kitsap Bangor PWD Facilities Engineering and Acquisition Division (FEAD) director must also certify the construction SWPPP.
- A copy of the permit
- Copy of completed NOI and copy of EPA's receipt acknowledgement

Additional guidance on preparing construction SWPPPs is at the EPA website address listed above.

#### Notice of Intent

- A Notice of Intent (NOI) needs to be filed by both the Contractor and the party administering the construction project (usually the FEAD).
- The contractor's NOI must be signed by the company owner or general partner or, in the case of a corporation by a "responsible corporate officer."
- The FEAD's NOI should be signed by the head military person onsite FEAD director or, the lead civilian, the resident Engineer if the FEAD chooses to delegate signature authority.
- To minimize the possibility for confusion and errors the FEAD NOI should be created after the Contractor has submitted their NOI to the FEAD for review/approval.
- Submit the NOI electronically after receiving electronic signature authority. Information on the EPA's electronic NOI program is available at the following link:  
<http://epa.gov/npdes/stormwater/-discharges-construction-activities#ereporting>.
- If paper NOIs must be used for the project, contact the EPA regional office.
- Site work cannot begin until 14 days after the NOI shows up in the EPA's database, which is available at the following link: [http://ofmpub.epa.gov/apex/aps/f?p=CGP\\_2012:Home](http://ofmpub.epa.gov/apex/aps/f?p=CGP_2012:Home).

## **APPENDIX E: ROUTINE FACILITY INSPECTION PLAN**

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## **Routine Facility Inspection Plan**

### **Routine Facility Inspection Procedures:**

- Inspect the facilities listed in Table 3-8 on a quarterly basis
- Table 4-1 is a complete listing of the required BMPs. It may be used to note compliance issues concerning BMP implementation.
- Figures E-1, E-2, and E-3 and Forms E-1, E-2, and E-3 can be used to assist and record the inspections.
- At least one quarterly inspection must be done during a rain event.
- Follow the Corrective Action Procedures in Section 7 and Appendix M for any deficiencies identified.
- Place all completed inspection forms into Appendix L, or other designated location, as the permanent record that inspections were completed.
- Place documentation with regard to follow-up corrective actions for discrepancies found during inspections in Appendix M, or other designated location, as the permanent record that inspections were completed.

### **Routine Facility Inspection Documentation:**

Document the findings of each routine facility inspection performed and maintain this documentation on-site with the facility SWPPP as required in MSGP. Although not required to submit routine facility inspection findings to EPA, unless specifically requested to do so, the results of these inspections will be included in the Annual Report to EPA. At a minimum, documentation of each routine facility inspection must include the following:

- The inspection date and time;
- The name(s) and signature(s) of the inspector(s);
- Weather information;
- A description of any discharges occurring at the time of the inspection;
- Any previously unidentified discharges from and/or pollutants from the site;
- Any evidence of, or the potential for, pollutants entering the stormwater drainage system;
- Observations regarding the physical condition or stormwater outfalls;
- Any stormwater control measures that need maintenance, repairs, or replacement;
- Any incidents of noncompliance observed; and
- Any additional control measures needed to comply with the permit requirements.

Forms E-1, E-2, and E-3 provide a convenient way to collect and record the bullet items above.

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## Form E-1: Quarterly Routine Facility Inspection Documentation, Ammo Pier, Pier Cargo, & Mobile Crane Lot

<b>NAVMAG Indian Island: Ammo Wharf, Pier Cargo Staging Area, Temp Mobile Crane Lot</b> <b>Inspection Date/Time:</b> _____ <b>Inspector:</b> _____ <b>Weather:</b> _____ <b>Signature:</b> _____  <b>Discharges at time of Inspection:</b> _____		
<b><u>BMPs and other things to look for:</u></b>	<b><u>Notes:</u></b>	
C-1 Good Housekeeping		
C-2 Minimize Exposure		
C-3 Preventative Maintenance		
C-4 Spill Prevention and Response Procedures		
C-5 Routine Facility Inspections		
Q-1 Vessel Pressure Washing		
Q-3 Materials Storage Areas		
Q-4 Engine or Vehicle Maintenance and Repair Area		
Q-5 General Yard Area		
<b>Certification Statement (2021 MSGP Appendix B Subpart 11)</b>		
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on the inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of imprisonment for knowing violations.		
<b>Name:</b> _____		<b>Title:</b> _____
<b>Signature:</b> _____		<b>Date Signed:</b> _____

Bldg Area #	Sector	Previously Unidentified Discharges of Pollutants	Control Measures Needing Repair	Failed Control Measures Need Replacement	Incidents of non-compliance with Control Measures	Additional Control Measures needed.	Condition Triggering Corrective Action/Problem to be Corrected
n918	P						
843	Q						
986	Q						
832	Q						
833	Q						

## Form E-2: Quarterly Routine Facility Inspection Documentation, Land Transportation & Warehouse Central Area

<b>NAVMAG Indian Island: Land Transportation and Warehousing Facilities</b> Inspection Date/Time: _____ Inspector: _____ Weather: _____ Signature: _____ Discharges at time of Inspection: _____		
<b><u>BMPs and other things to look for:</u></b>	<b><u>Notes:</u></b>	
C-1 Good Housekeeping		
C-2 Minimize Exposure		
C-3 Preventative Maintenance		
C-4 Spill Prevention and Response Procedures		
C-5 Routine Facility Inspections		
P-1 Vehicle and Equipment Storage Area		
P-2 Fueling Area		
P-3 Materials Storage Areas		
P-4 Vehicle and Equipment Cleaning Areas		

Bldg Area #	Sector	Previously Unidentified Discharges of Pollutants	Control Measures Needing Repair	Failed Control Measures Need Replacement	Incidents of non-compliance with Control Measures	Additional Control Measures needed.	Condition Triggering Corrective Action/Problem to be Corrected
831	P						
830	P						
826	P						
1019-1025	P						

Bldg Area #	Sector	Previously Unidentified Discharges of Pollutants	Control Measures Needing Repair	Failed Control Measures Need Replacement	Incidents of non-compliance with Control Measures	Additional Control Measures needed.	Condition Triggering Corrective Action/Problem to be Corrected
825	P						
827	P						
828	P						
829	P						

### Form E-3: Quarterly Routine Facility Inspection Documentation, Land Transportation & Warehouse West Area

<b>NAVMAG Indian Island: Land Transportation and Warehousing Facilities</b> Inspection Date/Time: _____ Inspector: _____ Weather: _____ Signature: _____ Discharges at time of Inspection: _____			
<b><u>BMPs and other things to look for:</u></b>		<b><u>Notes:</u></b>	
C-1 Good Housekeeping	P-5 Vehicle and Equipment Maintenance Areas		
C-2 Minimize Exposure	Q-4 and P-5 Engine or Vehicle Maintenance and Repair Area		
C-3 Preventative Maintenance	Q-5 General Yard Area		
C-4 Spill Prevention and Response Procedures	F-1 Vehicle Pre-wash Facility		
C-5 Routine Facility Inspections	Non-stormwater Discharges		
P-1 Vehicle and Equipment Storage Area	<b><u>Notes:</u></b>		
P-2 Fueling Area			
P-3 and Q-3 Materials Storage Areas			
P-4 Vehicle and Equipment Cleaning Areas			

Bldg Area #	Sector	Previously Unidentified Discharges of Pollutants	Control Measures Needing Repair	Failed Control Measures Need Replacement	Incidents of non-compliance with Control Measures	Additional Control Measures needed.	Condition Triggering Corrective Action/Problem to be Corrected
800	P						
1030	Q						
837	P						
n189	P						
300 + nearby	P						

Bldg Area #	Sector	Previously Unidentified Discharges of Pollutants	Control Measures Needing Repair	Failed Control Measures Need Replacement	Incidents of non-compliance with Control Measures	Additional Control Measures needed.	Condition Triggering Corrective Action/Problem to be Corrected
Vehicle Pre-Wash	P						
84	P						
70 + 62	P						
N187/924	P						
185	P						
N185	P						
289 +0290	Q						
90	Q						
132	Q						
218	Q						
77 + nearby	P						
Shoreline							



## **APPENDIX F: QUARTERLY VISUAL ASSESSMENT PLAN**

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## Quarterly Visual Assessment Plan

### Sampling Frequency and Recordkeeping:

Visual assessment of stormwater outfall discharges shall be conducted every quarter, at the locations shown in Table F-1, unless no storm event occurs within the quarter. Form F-1 can be used for documenting the visual assessment. If no runoff occurs within a quarter, Form F-1 should also be used to document that it was not possible to conduct the assessment. Form F-1 should be signed by the observer. The signed visual assessment reports must be kept onsite with the SWPPP. Place all completed visual assessment forms into Appendix L, or other designated location, as the permanent record that visual assessments were completed.

Note that Form F-1 can be used with either or both Visual Assessment and Benchmark Monitoring. Circle the “V” to designate a Visual Monitoring record.

### When and Where to Collect Samples for Visual Assessment:

- Collect a grab sample at each location listed in Appendix F, Table F-1.
- Collect samples during daylight hours.
- Collect samples from storm events, on discharges that occur at least 72 hours (3 days) from the previous discharge. The 72-hour (3-day) storm interval does not apply if there is documentation that less than a 72-hour (3-day) interval is representative for local storm events during the sampling period. Document all discrepancies on Form F-1.
- Collect samples within the first 30 minutes of an actual discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes and document why it was not possible to take samples within the first 30 minutes. In the case of snowmelt, samples must be taken during a period with a measurable discharge from your site.

### What Water Quality Characteristics to Assess:

- Color,
- Odor,
- Clarity,
- Floating solids,
- Settled solids,
- Suspended solids,
- Foam,
- Oil sheen, and
- Other obvious indicators of stormwater pollution.

### Quarterly Visual Assessment Records and Reporting:

Not Controlled unless viewed on NBK Environmental Website

NAVMAG SWPPP2021

Document the results of your visual assessments and maintain these records on-site with the SWPPP. It is not required to submit quarterly visual assessment records to EPA, unless specifically requested to do so. However, corrective actions that arise from the visual assessment will be reported to EPA in the Annual Report. Any corrective action required as a result of a quarterly visual assessment must be performed consistent with Section 7 and Appendix M and with MSGP Part 4.

Form F-1 may be used to record visual assessments. At a minimum, documentation of the visual assessment must include:

- Sample location(s);
- Sample collection date and time, and visual assessment date and time for each sample;
- Personnel collecting the sample and performing visual assessment, and their signatures;
- Nature of the discharge (i.e., runoff or snowmelt);
- Results of observations of the stormwater discharge;
- Probable sources of any observed stormwater contamination;
- If applicable, why it was not possible to take samples within the first 30 minutes; and
- A statement, signed and certified in accordance with 2021 MSGP Appendix B, Subsection 11.

**Safety:**

- Personal Protective Equipment: Raincoat, rain pants, hat/hood, gloves, colored safety vest, hard hat, and sturdy shoes or steel toe boots (if needed, e.g. when lifting storm drain covers)
- Traffic cones
- All monitoring must be done during daylight hours and monitoring must not be done during severe/extreme storm events
- Consider taking along a partner for sampling in some locations
- For emergency communication purposes, a cell phone and/or radio

**Sampling:**

- Equipment and Supplies:
  - o Map
  - o A clean dipper-type sampler
  - o Clear glass or plastic wide-mouthed jar or beaker
  - o A rainproof logbook such as “Rite in the Rain” type notebook
  - o Form F-1: NAVMAG Indian Island Stormwater Visual Assessment
  - o A copy of the Visual Assessment Plan
  - o Paper towels
  - o Scrub brush
  - o Bucket

- o Mild Detergent
- o Bottle of clean potable water
- Sample-Collection:
  - o Locate the outfall. If there is no discharge, record this information on Form F-1 beside the outfall number in the Description/Observation column.
  - o See Table F-1 for specific information about each outfall.
  - o Check the condition of the sampler (discoloration, residues, etc.) and clean as necessary using a mild detergent (if necessary) and water. See decontamination procedure below.
  - o Insert the dipper into effluent flow to collect sample. Be careful as to not disturb sediment/debris in the outfall pipe. Stay safely back from any ledges, bluffs, or drops.
  - o Fill and rinse the dipper 3 times with stormwater first, and then fill again with the stormwater sample. Collect one liter sample per outfall
  - o Pour the sample into a clear jar or beaker.
  - o Examine the sample for color, odor, turbidity, floating solids, foam, oil sheen, or other obvious indicators of stormwater pollution.
  - o Make notes of the sample's physical details on Form F-1. Check the box on Form F-1 "Visual Assessment Parameters" under each indicator that is present in the sample. Describe the indicator under "Notes."
- Decontamination Procedures
  - o Dipper-type sampler:
    - Examine for discoloration or residue prior to use.
    - If there are signs of contamination, clean using detergent and clear water. Collect the wash water in the bucket.
    - Rinse the dipper with effluent flow three times prior to sampling, for each outfall.
  - o Clear glass or plastic wide-mouthed jars or beakers:
    - Examine for discoloration or residue prior to use.
    - If there are signs of contamination, clean using detergent and clear water. Collect the wash water in the bucket.
    - Make sure the glass jar or beaker is clear, so that visual examination is possible.

### **Recordkeeping Procedures:**

- Complete a separate Form F-1 for each quarterly sampling event.
- Make sure the form is signed and dated.
- These forms then become part of the permanent stormwater record.

Place these records in Appendix L, or other designated location, as the permanent record that visual assessments were completed.

## Outfall Locations

See Figure A-12 for color-coded visual assessment outfall locations. See Figures A-1 through A-12 for more outfall and catch basin details.

**Table F-1: Visual Assessment Sampling Locations**

<b>Sampling Event</b>	<b>Outfall or Catch Basin #</b>	<b>Collection Point Description</b>	<b>Sampling Notes (Sample size is one liter)</b>
Collect 1 per sampling event	SW-020 or CB-020B	CB-020 or shore outfall, south edge of crane test area	Collect one, sample at the outfall or catch basin.
Collect 1 per sampling event at either of these locations*	SW-040 or upstream manhole	Upstream manhole or shore outfall, from Bldg. 77	Collect one, sample at the outfall or catch basin.
	SW-035	Curb cuts along quay slab 263.	Collect sample at one of the curb cuts along the slab. Vary the curb cut with each visual assessment.
Collect 1 per sampling event	SW-060	At outfall pipe at shoreline.	Collect one, sample at the outfall.
* May do visual assessment of either location. They must, however, be done on a rotating basis.			

### Form F-1: Visual Assessment and Analytical Monitoring

<b>Facility Name:</b>		<b>Year:</b>		<b>Things to note for each outfall:</b> <ul style="list-style-type: none"> <li>Description of sample observations.</li> <li>Probable sources of observed stormwater contamination.</li> <li>If applicable, why it was not possible to take sample with the first 30 minutes.</li> <li>If applicable, why it was not possible to take a sample.</li> <li>For quarterly monitoring, if a 72 hour interval is not possible, provide documentation to show that the representative local interval is &lt;72 hours.</li> </ul>	
<b>Sampler's Name:</b>		<b>Month:</b>			
<b>Sampler's Signature:</b>					
<b>Storm Event Duration:</b>					
<b>Rainfall Amount:</b>					
<b>Days Since Last Discharge:</b>		<b>Quarter:</b>	Jan-Mar		
<b>Runoff or Snowmelt:</b>			Apr-Jun		
<b>Estimated Time Discharge Began:</b>			Jul-Sep		
			Oct-Dec		

				Visual Assessment Parameters									Analytical Parameters							Notes	
Out fall No.	Date	Time	Visual (V) Benchmark (B) Indicator (I)	Color	Odor	Clarity	Floating Solids	Settled Solids	Suspended Solids	Foam	Oil Sheen	Aluminum	Lead	Zinc	pH	COD	TSS				
SW-020			V I																		
SW-035			V																		
SW-040			V I																		
SW-060			V B																		

Any Additional Comments	
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on the inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of imprisonment for knowing violations.	
Name:	Title:
Signature:	Date Signed:



## **APPENDIX H: ANALYTICAL MONITORING SOP**

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## **Background:**

NAVMAG Indian Island must collect and analyze stormwater samples and document monitoring activities consistent with the procedures described in 2021 MSGP Part 4 and any sector specific or State/Tribal specific requirements.

### **Introduction and Purpose:**

This NAVMAG Indian Island Analytical Monitoring Standard Operating Procedure (SOP) is a component of the Stormwater Pollution Prevention Plan.

The purpose of the SWPPP is to identify and minimize potential sources of stormwater pollution. Stormwater monitoring can help evaluate the effectiveness of implemented stormwater pollution control measures/BMPs and also help recognize otherwise unidentified pollution sources.

This analytical monitoring SOP provides assistance to personnel who monitor stormwater at NAVMAG Indian Island, under the requirement of the 2021 MSGP.

Read this SOP in its entirety before proceeding with monitoring.

## **Benchmark and Indicator Monitoring:**

MSGP Part 4.1 gives the detailed requirements for stormwater monitoring. The sector specific benchmark and indicator monitoring requirements are in the 2021 MSGP Part 8. Perform benchmark and indicator monitoring on the samples collected at the outfalls listed in Table H-1. Form F-1 is a log that can be used to record monitoring events.

See Figures A-9, A-11, and A-12 for color-coded outfall locations. See Figures A-1 through A-12 for more outfall and catch basin details.

Benchmark and indicator monitoring is the collection of stormwater samples for laboratory analysis. The indicator monitoring for pH will be done at the time of sampling with a pH meter. The samples will be analyzed for the constituents indicated in Table H-2. Results of the sampling will be compared to MSGP specifying “benchmark” values, also shown in Table H-2. Results with levels above the benchmark values will require further evaluation.

## **Impaired Waters Monitoring**

There is no impaired waters monitoring required for the 2021 MSGP permit coverage cycle.

## Monitoring Locations and Frequency:

Perform benchmark and indicator monitoring on the samples collected at the outfalls listed in Table H-1. Form F-1 is a log that can be used to record monitoring events.

Collect a grab sample at each outfall location listed in Table H-1.

Collect a sample of the receiving water to analyze for hardness.

Collect samples during daylight hours.

Quarterly samples and annual impaired water sampling must be collected from storm events on discharges that occur at least 72 hours (3 days) from the previous discharge. The 72-hour (3-day) storm interval does not apply if it is documented that less than a 72-hour (3-day) interval is representative for local storm events during the sampling period. Document this on Form F-1.

Collect samples within the first 30 minutes of an actual discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes and document is required as to why it was not possible to take samples within the first 30 minutes. Such documentation shall be signed and certified. In the case of snowmelt, samples must be taken during a period with a measurable discharge from the site.

If it is not possible to take the sample at the outfall itself, visual assessment or benchmark sampling may be done at a designated catch basin upstream from an outfall. If a sample is taken at a catch basin, collect the sample from the fresh incoming stormwater and not from the pooled water in the catch basin.

**Table H-1: Benchmark/Indicator Monitoring Locations**

<b>Outfall or Catch Basin #</b>	<b>Sector Association</b>	<b>Collection Point Location</b>
SW-020 or CB-020B	P & Q	See Table 2-3 and Figure A-4
SW-040 or upstream manhole	P	See Table 2-3 and Figure A-4
SW-060 or CB-060A	Q	See Table 2-3 and Figure A-6

## Required Analytical Analyses:

1) Analysis of outfall samples:

All samples in Table H-2 are required to be stored in containers supplied by the contract laboratory (typically a 500-mL High-Density Polyethylene (HDPE) container) and must be cooled to 6°C. See Table H-2 for a schedule of the required analyses.

Table H-2: Benchmark/Indicator Sampling Requirements

			SW-020	SW-040	SW-060
<b>Analyte</b>	<b>2021 MSGP Sector</b>	<b>Benchmark Value</b>			
Total Recoverable Aluminum	Q	1,100 µg/L	Quarterly <sup>1</sup>	-	Quarterly <sup>1</sup>
Total Recoverable Lead	Q	210 µg/L	Quarterly <sup>1</sup>	-	Quarterly <sup>1</sup>
Total Recoverable Zinc	Q	90 µg/L	Quarterly <sup>1</sup>	-	Quarterly <sup>1</sup>
Chemical Oxygen Demand (COD)	P	Report Only/No thresholds or baseline values	Quarterly <sup>2</sup>	Quarterly <sup>2</sup>	
Total Suspended Solids	P	Report Only/No thresholds or baseline values	Quarterly <sup>2</sup>	Quarterly <sup>2</sup>	
pH	P	Report Only/No thresholds or baseline values	Quarterly <sup>2</sup>	Quarterly <sup>2</sup>	

<sup>1</sup> Quarterly until annual average is less than benchmark, then quarterly sampling starts again at beginning of fourth year of coverage.

<sup>2</sup> Quarterly for entirety of permit coverage.

## **Records and Reporting:**

Monitoring data must be reported using EPA's electronic NetDMR tool at [www.epa.gov/netdmr](http://www.epa.gov/netdmr), as described in 2021 MSGP Part 7.3 (unless a waiver from electronic reporting has been granted from the EPA Regional Office, in which case a paper DMR form may be submitted). It shall be submitted no later than 30 days (email date or postmark date) after receiving laboratory results for all monitored outfalls for the reporting period.

For benchmark monitoring, note the requirement to submit sampling results to EPA no later than 30 days after receiving laboratory results for each sampling event, in accordance with 2021 MSGP Part 7.3.1. If multiple samples are collected in a single quarter (e.g., due to adverse weather conditions, climates with irregular stormwater runoff, or areas subject to snow), submit all sampling results to EPA within 30 days of receiving the laboratory results.

Corrective actions that arise from the analytical monitoring will be reported to EPA in the Annual Report. Any corrective action required must be performed consistent with Section 7 and Appendix M and with MSGP Part 3.

Use the Form F-1 included in Appendix F to record benchmark sampling events. Keep this record along with the analysis results in Appendix L.

## **Safety:**

Use the following:

- Personal Protective Equipment: raincoat, rain pants, hat/hood, gloves, colored safety vest, hardhat, and sturdy shoes or steel toe boots (if needed, e.g. when lifting storm drain covers).
- Use traffic cones as needed in traffic areas.
- All monitoring must be done during daylight hours and monitoring must not be done during severe/extreme storm events.
- Consider taking along a partner for sampling in some locations.
- For emergency communication purposes, use a cell phone and/or radio.
- Wear safety/lab goggles if acids are used to preserve samples.

In addition, monitoring personnel should be aware of the cautionary measures appropriate for handling nitric acid (a preservative), which may have been placed in the sample container by the contract lab. When opening each of the sample bottles, be sure to face away from the opening, as the moisture in the air will cause the nitric acid to fume.

Quality Assurance/Quality Control:

- QA/QC samples may be collected to detect potential errors introduced during sampling, handling, shipping, and analysis. The QA/QC samples should be collected and handled in the same manner as actual samples and in accordance with the procedures outlined in the NPDES Guidance Document (EPA 1992). Sample Chain of Custody (CoC) also should be maintained as prescribed in the Guidance.
- All laboratory analyses should be performed in accordance with EPA Methods for Chemical Analysis of Water and Wastewater, EPA Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater, and Standard Methods for the Examination of Water and Wastewater. The analytical data should be reviewed to assess data quality and usability based on the EPA Functional Guidelines for Data Validation. The data should be evaluated for use in stormwater characterization and regulatory decision-making.

## **Field Sampling Procedures:**

### **Preparation:**

- Sampling SOP
- 72-hour dry period for quarterly and annual sampling.



- Check safety gear (see list above)
- Check gear
- Sample bottles
- Notebook
- Manhole puller
- Pen/sharpie and spares
- Chain-of-custody (CoC) – see samples at end of this procedure
- Bottle labels
- CoC seals
- Dipper (inspect and clean if necessary)
- Cooler (s)
- Ice/blue ice
- Plastic sheeting
- Paper towels or lab towels
- Analytical monitoring Form F-1
- Extra clean sample container – transfer container
- Zip-lock bags

**Paperwork:**

- Fill out labels and CoC as much as possible prior to leaving the office.
- Fill out Form F-1 as much as possible prior to leaving the office.

**Sampling:**

- Note when the rainfall started.
- Put on gloves and safety goggles.

- Place traffic cones if applicable.
- Take care when removing manhole cover/catch basin grates. Do not fully remove catch basin grates. Just move to the side but leave some in groove. Take care not to allow the grate to fall in catch basin.
- Note details of discharge. Estimate flow rate or depth of flow and other details.
- Decontaminate the dipper. Rinse in effluent three times. Do not touch dipper to sides or bottom of pipe, manhole, or catch basin. See decontamination procedures in this section.
- Insert dipper into effluent flow to collect sample. Be careful not disturb sediment/debris in the outfall pipe. Stay safely back from any ledges, bluffs, or drops.
- Fill and rinse the sampler with stormwater first, and then fill again with the stormwater sample.
- Fill bottles to about the neck, but do not overfill. This will prevent loss of any preservative that might have been added by the laboratory (e.g. some labs may have added a few ml of acid to the bottle). Take care when removing cap as moisture in the air can react with the acid. This is especially true with nitric acid, which is used to preserve metals samples. Hold the bottle away from the body when opening. Keep cap oriented down to prevent pollutants from settling in the cap.
- If necessary add nitric acid until the pH of the sample falls below 2.
- A pH indicator is useful but not required. It would be used to ensure the pH of the sample is at or below required levels for adequate preservation.
- For metals, an interim container is ok provided it is clean.
- Note the time when sample was collected on Form F-1.
- Note weather conditions on Form F-1.
- Note: Multiple bottles can still be one sample.
- Fill out sample container label and apply to the container. Apply custody seal if provided by the laboratory.
- Store the container in the prepared cooler.
- Complete the CoC. Line out and initial any mistake. Make sure to note the required analytical method and the digestion method (total recoverable). Sign and date the CoC when sampling is complete.
- Seal the completed CoC in a zip lock bag, and store in the cooler with the sample bottles.

- Transport the cooler to contractor's laboratory within required holding time.
- Complete Form F-1.
- Proceed to next outfall.

**Decontamination Procedures:**

- Examine the dipper for discoloration or residue prior to use.
- If there are signs of contamination, clean using detergent and water. Make sure the last rinse is with deionized water.

**Post Sampling:**

- Complete Form F-1, container labels and CoC. Line out and initial any mistake. Make sure to note the required analytical method and the digestion method (total recoverable). Sign and date forms when sampling is complete.
- Make sure to ask for the necessary analysis on the CoC.
- Pack samples in cooler. Use cube ice if available but blue ice is ok. If using cube ice place it inside zip lock bags. May want to place each bottle inside a zip-lock bag. Place CoC in zip lock bag and place inside cooler.
- Transport the cooler to contractor laboratory within the required holding time. For the majority of metals it is six months, but some parameters are shorter so need to be careful not to exceed a holding time
- Sign off on CoC and make sure lab “takes” custody.
- Get a copy of the CoC.

## **APPENDIX I: TRAINING GUIDANCE AND RECORDS**

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## **Training Guidance and Records**

NAVMAG Indian Island will train employees that work in areas where industrial materials or activities are exposed to stormwater, and employees that are responsible for implementing activities identified in the SWPPP (e.g., inspectors, maintenance people) as necessary.

Annual training is required. Training can be conducted in-person at the annual NAVMAG Indian Island Environmental Awareness Training. Other training may be conducted for specific areas or work processes of concern as needed. Other training may be formal or relayed informally through meetings, phone calls, e-mails, posters, pamphlets, or intranet.

Training must include the following three areas:

1. Background. Provide the very basics of stormwater runoff. This aspect of the training should be brief. Most personnel will have some existing knowledge in this area. The intent is to develop that knowledge to the point where it is in a coherent framework setting the stage for follow-on training. Strive to answer questions such as:

- What is stormwater?
- What types of pollutants can stormwater runoff pick up? Explain how pollution can be entrained in stormwater. Make it as much as possible specific to NAVMAG Indian Island operations.
- What are the potential impacts of those potential pollutants?
- How does stormwater runoff from NAVMAG Indian Island get to surface waters and what if any treatment is provided on the way? Many people do not realize that generally little if any treatment is provided.

2. Regulation. Again this aspect of the training should be brief. The main intent is to relay that there is an existing regulatory framework that NAVMAG Indian Island is obligated to comply. Relay the following points as a minimum:

- NAVMAG Indian Island has a Clean Water Act permit authorizing discharge of stormwater.
- The permit requires NAVMAG Indian Island to:
  - o Identify potential sources of pollution, which may reasonably be expected to affect the quality of stormwater discharges.
  - o Describe and ensure the implementation of practices to reduce the pollutants in stormwater.
- Note that NAVMAG Indian Island has done this through development and implementation of a SWPPP, and this training is one required component of the Plan. Bring along a few copies of the SWPPP on CD or hardcopy in case anyone wants to take a look.
- Note that quarterly inspections are required and who will conduct the inspections.
- Describe the corrective action process and the reporting requirements to the EPA.
- Comment that NAVMAG Indian Island is required to collect and analyze stormwater samples. If results are too high additional restriction may need to be implemented.

3. Required Actions. Relay that the SWPPP requires NAVMAG Indian Island to develop and implement control measures/best management practices (BMPs) to minimize stormwater pollution. Relay the following:

- Go through the core BMPs. Be prepared to spend time on each BMP to fully answer questions on how each BMP specifically applies to each particular type of work. Be prepared for and volunteer to provide follow-up. For example, someone may be unsure if a particular work practice is acceptable or not. Volunteer to stop by and witness the practice to help with a determination.
- Go through the Sector-specific BMPs. It may be prudent to consolidate similar BMPs. It may also be worthwhile to clarify which BMPs relate to which locations/work practices.
- Facility-specific BMPs may not need to be relayed during the training depending on who attends the training and the allotted time. For instance BMP F-1, Oil Containment Boom pressure washing, only applies to a very limited number of personnel and can be briefed separately.
- Other facility-specific BMPs, including F-2, F-4, F-5, F-7, F-8, and all the S BMPs, will be briefed to facility specific personnel.
- Training can be augmented in the form of posters, pamphlets, e-mails, internal newsletters, intranet, and attendance at other environmental/safety related meetings.

Be sure to distribute a sign-in roster or otherwise document attendance for all training. Maintain a copy of the roster or other record in this Appendix. Place copies of SWPPP related training materials in this Appendix. Also be sure to document “other” training. This could include newsletter articles, e-mails, pictures, and slides/handouts. Form I-1 may be used to document training.



### Form I-1: SWPPP Training Roster/Record

Date: \_\_\_\_\_ Type of Training:

\_\_\_\_\_

Instructor Name: \_\_\_\_\_ Instructor Signature:

Name (Printed)	Signature (Initial)	Work Center or Command	E-mail Contact

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## **APPENDIX J: NON-STORMWATER DISCHARGE ASSESSMENT**

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## **Non-Stormwater Discharge Assessment Report Naval Magazine Indian Island, WA**

Conducted by: C. MacKenzie (Naval Facilities Engineering Command Northwest)  
M. Jabloner (Naval Facilities Engineering Command Northwest)

Assessment Date: 14 August 2007

Purpose: The assessment was completed as a component of updating the Stormwater Pollution Prevention Plan (SWPPP) for Naval Magazine. The purpose of the assessment was twofold.

Determine the disposition of rinse water generated at the Building 90 vessel rinse area.

Find outfall SW-N22 which drawn to the northeast of Building 77.

Discussion: The roofed area behind Building 90 (west side) is used by Port Operations to park vessels on trailers and rinse off salt water after in-water use. A concrete mix/batch plant formerly occupied this area and the drainage system was likely built to serve the plant. Rinse water enters an approximate 4 ft. by 8 ft. grated sump. The sump may be baffled to enhance settling. Rinse water exits the sump via a concrete trench with diamond plate steel covers. The trench drains into perhaps another settling sump. The plate over this sump is too heavy to manually move so it could not be inspected. We looked through facility drawings but they did not contain any applicable information. We added red dye and water to the grated sump to try to determine the ultimate disposition of the rinse water but we were unsuccessful. The water level in the grated sump was a few inches below the outlet so it took some time for the dyed water to outflow. In addition, the trench had a layer of sand/pebbles, which would have retarded flow. For the purposes of the Stormwater Pollution Prevention Plan (SWPPP) we will presume that the rinse area discharges into the storm sewer or directly to surface water.

### **Figure J-1: Building 90 Vessel Rinse Area**

We added red dye and water to the catch basin adjacent to Building 77, which, per the drawings, discharges to outfall SW-N22. The purpose of this effort was to locate the outfall pipe so samples could be collected in the future. It appeared that the majority of stormwater from the outfall is from the roof of Building 77 not from surrounding pavement. The outfall was not found. The dyed water may show up during a future rainfall event. It is likely that the outfall pipe is behind the shoreline armoring system. The SWPPP will continue to note this outfall as “not found.”

Matt Jabloner, P.E.

Naval Facilities Engineering Command Northwest

Figure J-2: 2019 Dry Weather Survey

2019 NAVMAG Indian Island Dry Weather Survey	
Outfall	Description of Flow
10	Dry
20	Dry, pond is dry
35	Dry
40	Dry
50	One drop every 10 seconds
60	Dry
70	Dry
90	Dry
100	Dry
110	Dry
120	Dry
130	Dry
140	Dry

## **APPENDIX K: RESERVED FOR FUTURE USE IF NECESSARY**

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# **APPENDIX L: REPORTING REQUIREMENTS SUMMARY INCLUDING ANNUAL EPA REPORT, DISCHARGE MONITORING REPORTS, AND RELATED DOCUMENTATION**

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Table L-1 shows the location where each type of record/report is kept.

**Table L-1: Summary of SWPPP Reporting and Recordkeeping Requirements**

<b>Reporting/ Recording Requirement</b>	<b>Requirement Description</b>	<b>Record Location</b>
Stormwater Analytical Monitoring Reports	SWPPP Section 5	SWPPP, Appendix L and or Share Drive
Spill Reports	SWPPP Section 3.2	NAVMAG Indian Island Environmental Office
Visual Assessment Reports	SWPPP Section 6.2.1	SWPPP, Appendix L and or Share Drive
Quarterly Routine Inspection Reports	SWPPP Section 6.2.2	SWPPP, Appendix L and or Share Drive
Maintenance Records: Stormwater conveyance system Oil/water separators	MSGP 8Q.3.3 and Appendix B, B.10	Public Works Office Files and BOSC Files
Employee Training Records	MSGP 2.1.2.8 and Sector specific BMPs	SWPPP, Appendix L, and or Share Drive

Form L-1 is provided to help organize and track requirements and to keep records as required by the MSGP. Recommend that one of these forms be created for each reporting year and that all the records and reports associated with that reporting year be filed “behind” the form.

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Form L-1: Sampling, Inspection, and Reporting Requirements Summary and Tracking

Facility: \_\_\_\_\_

Reporting Year/Date Span: \_\_\_\_\_

Event / Requirement	Reporting Period	Rain Event Dependent?	“DMR” Report to EPA	Annual Report to EPA MSGP, Appendix I <sup>4</sup>	Annual Event Completion Date	1 <sup>st</sup> Quarter Event Completion Date	2nd Quarter Event Completion Date	3rd Quarter Event Completion Date	4th Quarter Event Completion Date	Date Annual Report Submitted <sup>3</sup>
Routine Facility Inspection	Quarterly	No/Yes <sup>5</sup>	No	Yes <sup>2</sup>						
Annual Report	Annual	No	No	Yes						
Visual Assessment	Quarterly	Yes	No	Yes <sup>2</sup>						
Benchmark Monitoring	Quarterly	Yes	Yes <sup>1</sup>	No						
<b>Notes:</b> 1. All monitoring data must be submitted to EPA using EPA’s online netDMR system ( <a href="http://www.epa.gov/netDMR">www.epa.gov/netDMR</a> ) no later than 30 days (email date or postmark date) receipt of laboratory results for all monitored outfalls for the reporting period. 2. A summary of visual assessment documentation and a summary of routine facility inspections documentation will be included in the Annual Report. 3. Submit an annual report to EPA by January 30 <sup>th</sup> , for each year of permit coverage that includes the year’s summaries of routine facility inspections/visual assessments and all required corrective action documentation. If corrective action is not yet completed at the time of submission of this annual report, describe the status of any outstanding corrective action(s). 4. The permit requires this report be signed by an "authorized representative" of the "principal executive officer" of a federal facility, which includes an individual "having overall responsibility for environmental matters." An individual is considered “duly authorized” only if the “principal executive officer” of the federal facility has documented the delegation in writing with the EPA Regional Administrator. 5. One quarterly inspection per year must occur during a rain event.										

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## **Additional Reporting Requirements:**

- In addition to the reporting requirements outlined in Form L-1, facilities are also subject to the standard permit reporting provisions of 2021 MSGP Part 7.6 and 2021 MSGP, Appendix B, Subsection 12.
- Where applicable, submit the following reports to the appropriate EPA Regional Office listed in 2021 MSGP Part 7.8:
  - 24-hour reporting (see 2021 MSGP, Appendix B, Subsection 12.F) – Report any noncompliance which may endanger health or the environment. Any information must be provided orally within 24 hours from the time you become aware of the circumstances;
  - 5-day follow-up reporting to the 24 hour reporting (see 2021 MSGP, Appendix B, Subsection 12.F) – A written submission must be provided within five days of the time you become aware of the circumstances;
  - Reportable quantity spills (see MSGP Part 2.1.2.4) – Provide notification, as required under 2021 MSGP Part 2.1.2.4, as soon as you have knowledge of a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity;
  - Planned changes (see MSGP, Appendix B, Subsection 12.A) – Give notice to EPA promptly, no fewer than 30 days prior to making any planned physical alterations or additions to the permitted facility that qualify the facility as a new source or that could significantly change the nature or significantly increase the quantity of pollutants discharged;
  - Anticipated noncompliance (see MSGP, Appendix B, Subsection 12.B) – Give advance notice to EPA of any planned changes in the permitted facility or activity which you anticipate will result in noncompliance with permit requirements;
  - Transfer of ownership and/or operation – Submit a complete and accurate NOI in accordance with the requirements of MSGP, Appendix G and by the deadlines specified in MSGP Table 1-2;
  - Compliance schedules (see MSGP, Appendix B, Subsection 12.F) – Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit must be submitted no later than 14 days following each schedule date;
  - Other noncompliance (see MSGP, Appendix B, Subsection 12.G) – You must report all instances of noncompliance not reported in your Annual Report, compliance schedule report, or 24-hour report at the time monitoring reports are submitted; and
  - Other information (see MSGP, Appendix B, Subsection 12.H) – Promptly submit facts or information upon becoming aware of a failure to submit relevant facts in an NOI or that incorrect information was submitted in an NOI or in any report.

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## **APPENDIX M: CORRECTIVE ACTION DOCUMENTATION**

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**Form M-1: Corrective Action Tracking for Annual Report**

Reporting Period: \_\_\_\_\_

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Form M-2: NAVMAG Indian Island Corrective Action Table

Date: Reporting Period:

Bldg #	Issue	New or Update	Date Identified	Date Action Initiated	How Problem Was Identified	Description of Corrective Action	Responsible Party	SWPPP Update Required	Status/ Completion Date

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## **APPENDIX N: SIGNIFICANT MATERIALS**

***Electronic Files Available***



## **APPENDIX O: RECORD OF SPILLS**

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Table 3-2 and 3-3 of SWPPP show reportable and non-reportable spills from 2009 through 2020. Table O-1 will be used for SWPPP documentation any reportable or non-reportable spills that occur subsequent to those spills listed in Table 3-2 and 3-3.

**Table O-1: Spills and Releases**

<b>Date and time</b>	<b>Location</b>	<b>Material and volume</b>		<b>Description/Cause/Corrective actions</b>

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## **APPENDIX P: MAINTENANCE DOCUMENTS**

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