Stormwater Pollution Prevention Plan

Naval Station Everett
June 2021

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Naval Station Everett
June 2021

Prepared by

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Silverdale, WA 98315-1101

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Prepared by

_____

(Signature) (Date)

Jeremy R. Judd, E.I.
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NAVAL STATION EVERETT SWPPP
RECORD OF REVIEW AND AMENDMENTS

All reviews and amendments to this plan shall be summarized below.

Date	Description of the Modification	Name	Signature
1/1996, 12/1997, 6/2005, 5/2009	Full re-write of SWPPP following issuance of new Multi-Sector General Permits (MSGPs)	Unlisted	PRIOR REVISIONS
5/17/2011	Update of all drawings following receipt of permit approval under 2008 MSGP	S. Jefferis D. Robinson W. Drummond	PRIOR REVISION
1/4/2016	Full re-write of SWPPP following issuance of 2015 MSGP	P.Haun D. Robinson	PRIOR REVISION
02/23/2021	Update of SWPPP to meet 2021 MSGP requirements	Jeremy Judd Holli Lamb	

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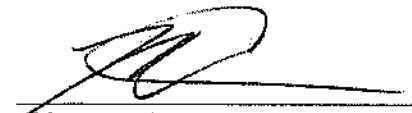
Certification and Signature

"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 contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained 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."



9 JUN 21

(Signature) (Date)

M.F. DAVIS
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2000 West Marine View Drive
Everett, WA 98207

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APPENDICES

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List of Acronyms

µg/L ..... *Microgram Per Liter*
BMP ..... *Best Management Practice*
$CaCO_3$ ..... *Calcium Carbonate*
CDX ..... *Central Data Exchange*
CERCLA ..... *Comprehensive Environmental Response, Compensation and Liability Act*
CGP ..... *construction general permit*
CHT ..... *collection, holding, and transfer*
COMNAVREG NW ..... *Commander, Navy Region Northwest*
CWA ..... *Clean Water Act*
DLA ..... *Defense Logistics Agency*
DMR ..... *Discharge Monitoring Report*
ELG ..... *Effluent Limitation Guideline*
EPA ..... *Environmental Protection Agency*
ESA ..... *Endangered Species Act*
EWCC ..... *Environmental Work Center Coordinator*
FISC ..... *Fleet and Industrial Supply Center*
FRCNW ..... *Fleet Readiness Center Northwest*
HAZMAT ..... *hazardous materials*
HAZMIN ..... *Hazardous Substance Minimization*
ICP ..... *Integrated Contingency Plan*
IDDE ..... *Illicit Discharge Detection and Elimination*
INRMP ..... *Integrated Natrual Resources Management Plan*
L/UL ..... *loading/unloading*
mg/L ..... *milligram per liter*
MS4 ..... *Municipal Separate Storm Sewer System*

MSGP.....*Multi-Sector General Permit*
MWR .....*Morale, Welfare, and Recreation*
NAVFAC .....*Naval Facilities Engineering Command*
NAVSTA .....*Naval Station*
ND.....*Not Detected Above Method Detection Limit*
NeT-MSGP .....*NPDES eReporting Tool for MSGP*
NHPA.....*National Historic Preservation Act*
NMFS.....*National Marine Fisheries Service*
NODI .....*No Discharge*
NOI .....*Notice of Intent*
NPDES.....*National Pollutant Discharge Elimination System*
NQE .....*No Qualifying Event*
NRC .....*National Response Center*
OWS.....*oil/water separator*
PAH .....*Polycyclic Aromatic Hydrocarbons*
PCB.....*Polychlorinated Biphenyls*
POL.....*petroleum, oils, and lubricants*
PSNS & IMF..... *Puget Sound Naval Shipyard and Intermediate Maintenance Facility*
PWD..... *Public Works Department*
RCRA.....*Resource Conservation and Recovery Act*
SIC .....*Standard Industrial Classification*
SPCC.....*Spill Prevention, Control, and Countermeasures*
SWMP.....*Stormwater Management Program*
SWPPP.....*Stormwater Pollution Prevention Plan*
TMDL .....*Total Maximum Daily Load*
TSS.....*Total Suspended Solids*
USCG..... *U.S. Coast Guard*
USFWS .....*U.S. Fish and Wildlife Service*
WDFW.....*Washington State Department of Fish and Wildlife*
WDOE .....*Washington State Department of Ecology*
WQI ..... *Water Quality Improvement*

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Public Disclaimer

Portions of this Stormwater Pollution Prevention Plan are withheld from public access. The following materials have been redacted:

- Building names and numbers
- Facility Descriptions
- Facility Maps
- Outfall Locations
- Off-base inflows

These items are Restricted Information as defined in the Multi-Sector General Permit, Appendix A.

1 Introduction

1.1 Purpose and Scope

This Stormwater Pollution Prevention Plan (SWPPP) was prepared for Naval Station (NAVSTA) Everett, Washington to comply with the terms and conditions of the Multi-Sector General Permit (MSGP), Authorization to Discharge Under the National Pollutant Discharge Elimination Systems (NPDES) for Stormwater Discharges Associated with Industrial Activity, United States Environmental Protection Agency (EPA).

This SWPPP identifies the sources and potential sources of pollutants that may reasonably be expected to affect the quality of stormwater discharges associated with industrial activities at NAVSTA Everett; defines practices and measures that will help to minimize and control pollutants in those discharges; establishes a plan for the implementation of these practices and measures and a mechanism that will ensure their implementation; and establishes a plan for the evaluation of the effectiveness of the plan in controlling and reducing pollution of stormwater discharges.

1.2 MSGP Required Elements

The MSGP requires certain elements in the SWPPP for permit coverage. Table 1-1 identifies required elements, the associated MSGP sections, and the corresponding sections of the SWPPP where elements are addressed.

Table 1-1: Required SWPPP Elements and Corresponding Sections

Required SWPPP Element	MSGP Section	SWPPP Section(s)
Stormwater pollution prevention team	6.2.1	2.3
Site description, including: • Activities at the facility • General location map • Site map(s) and figures	6.2.2	Section 2 Figure 2-1 Appendix A
Summary of potential pollution sources	6.2.3	4
Description of control measures	6.2.4	5
Schedules and procedures	6.2.5	7
Documentation to support eligibility considerations under other federal laws	6.2.6	8
Signature requirements	6.2.7	3.1.4

This plan was developed in accordance with the EPA guidance, "Developing Your Stormwater Pollution Prevention Plan: A Guide for Industrial Operators, EPA 833-B-09-002 (June 2021)" and follows the general format provided in the EPA Industrial SWPPP Template, consistent with the 2021 MSGP.

1.3 Regulatory Background

1.3.1 Federal Stormwater Regulations

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 Notice of Intent (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.

1.3.2 Navy Stormwater Regulations

Requirements and policies regarding stormwater discharges for Navy facilities are stipulated in the Department of the Navy's Environmental and Natural Resources Program Manual, OPNAVINST 5090.1E (U.S. Navy 2019). 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 that these discharges must meet all applicable federal, state, and local permit requirements, including control requirements for toxic and non-conventional pollutants and Best Conventional Technology (BCT) limits for 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.

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.

The Navy's stormwater compliance strategy for NAVSTA Everett is discussed in the following section.

1.3.3 Stormwater Compliance Strategy, NAVSTA Everett

The State of Washington is an NPDES-delegated state with general permitting authority. However, industrial stormwater discharges from federal facilities in the State of Washington are

handled by the EPA. Federal facilities in Washington State are eligible for coverage under an individual NPDES permit or the Multi-Sector general permit. Construction activities that disturb one or more total acres of land at federal facilities in the State of Washington are eligible for coverage under EPA's construction general permit:

(site: https://www.epa.gov/sites/production/files/2019-06/documents/final_2017_cgp_current_as_of_6-6-2019.pdf).

Administration of these permits is by EPA, Region X, Water Management Division (WD-134), Stormwater Staff, Seattle, Washington.

This SWPPP, including the BMP plan and stormwater monitoring program, was developed to meet requirements of the Multi-Sector general permit. BMP and monitoring requirements as outlined in the Multi-Sector general permit have been included in this SWPPP.

Existing industrial facilities that intended to be covered by the Multi-Sector general permit were required to submit a NOI in accordance with Part II of the permit by March 29, 1996. For NAVSTA Everett, a NOI to comply with the Multi-Sector general permit was postmarked on November 13, 1996. NOIs were also submitted on March 5, 2001, May 2009, January 2016, and May 2021 to obtain coverage under the reissued Multi-Sector General Permits. 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 NAVSTA Everett 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 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 as Appendix D.

1.4 Comparison to Other Environmental Management Plans

Because NAVSTA Everett is located on the Snohomish River, hazardous waste reduction while minimizing hazardous waste liability, spill prevention, and cleanup have been a priority. Environmental management plans for NAVSTA Everett are required by other applicable environmental laws and regulations related primarily to the prevention and management of spills and leaks of hazardous materials and minimizing hazardous waste generation on base. Existing plans of this type for NAVSTA Everett include the Oil Spill Prevention Control and Countermeasure Plan (SPCC) and Oil/Hazardous Substance Integrated Spill Contingency Plan which are part of the Navy's region-wide spill response plan and Hazardous Materials Control and Management (HMC&M) Plan; these plans include sections for hazard communications (HAZCOM) and material control, hazardous materials control and management, ozone depleting substances, emergency planning and community right-to-know (EPCRA), polychlorinated biphenyls (PCB), pesticides, asbestos, and hazardous waste minimization. Some of the practices identified in this SWPPP for preventing stormwater pollution by the industrial activity at NAVSTA Everett are required or recommended by these plans; some are already in place. Overlaps in the plans are identified in the following paragraphs.

1.4.1 Spill Prevention Control and Countermeasure (SPCC) Plan

A SPCC Plan was completed for NAVSTA Everett in 1995. The most recent plan is expected June 2021. The SPCC Plan was prepared in accordance with planning standards of Title 40 of the Code of Federal Regulations, Section 112 (40 CFR 112). The plan provides information regarding existing activities related to oil pollution control including equipment testing, required inspections, oil handling procedures, and security measures.

The SPCC also outlines current training programs and requirements related to fuel oil. All civil service and contractor personnel involved with fuel handling operations receive the following initial training as a minimum requirement: a summary of SPCC regulation and Navy Policy, a requirement to understand the pertinent sections of the NAVSTA Everett SPCC plan; a discussion of all Standard Operating Procedures (SOP) contained in the SPCC plan and a discussion of spill reporting and emergency response procedures. Training is the responsibility of the first line supervisors and contractors at each facility that handles or stores petroleum, oil, or lubricants (POL) or related products including waste oil. This includes initial training for new employees and follow-up training on an annual basis. Existing environmental training programs provided under other environmental management plans at NAVSTA Everett are summarized in Table 1-1.

The requirements of the SPCC Plan are compatible with the goals of the SWPPP because several procedures, practices, and measures that are helpful in reducing the potential for stormwater pollution are already in place or recommended/required through the SPCC Plan. These include: periodic inspection and testing of aboveground storage tanks (ASTs) and underground storage tanks; secondary containment berms for bulk fuel storage tanks and fuel truck loading racks; third party monitoring of fuel transfers; carrying of sorbent material by fuel truck operators; inspection and maintenance programs for fuel transfer and storage equipment; facility security; training programs and requirements; and standard operating procedures for drum and small container handling, oil tank containment area draining operations, fuel spills; loading and unloading procedures for fuel transfer. Stormwater pollution control BMPs presently either in place and/or recommended by the SPCC Plan are summarized in Table 1-2.

1.4.2 Integrated Contingency Plan

Command, Navy Region Northwest (COMAVREGNW) has developed a regional Oil/Hazardous Substance (OHS) Integrated Contingency Plan (ICP). The plan was updated in June 2016. The purpose of the ICP is to provide specific direction to be followed by Navy personnel to allow prompt, efficient coordination and response to any OHS spill that occurs in the Navy's Northwest Region. All spills at NAVSTA Everett are reported to the Spill Response Team which implements the ICP to contain and clean up the spill. Potential stormwater pollution BMPs that are in place at NAVSTA Everett and/or are required as a result of the program include: keeping records of all spills and leaks of toxic or hazardous materials; providing adequate spill control/containment material for the control of spills and leaks; properly disposing of any significant materials or contaminated waste; training of personnel for proper storage, use, cleanup, and disposal of materials; and recordkeeping practices. These are summarized in Table 1-1.

1.4.3 Hazardous Waste Management Plan (HWMP)

A HWMP was prepared to establish policy, procedures, and requirements for life-cycle control of hazardous waste at NAVSTA Everett in accordance with the requirements of Naval Instruction and federal regulation. The HWMP was updated most recently in January 2021. The HWMP Plan describes the material management process and identifies sources of information for all hazardous waste management at NAVSTA Everett. The plan was designed to control the quantity, types, and storage of hazardous waste and to reduce, where possible, the generation of hazardous waste. The plan also incorporates stormwater pollution prevention BMPs that are in place at NAVSTA Everett and/or are required as a result of the program. These BMPs include labeling of all containers, keeping absorbent material on hand in case of spills, properly storing containers, properly disposing of any significant materials and contaminated waste, training, and recordkeeping. These are summarized in Table 1-1.

The HWMP Training Program described in the plan provides personnel training for hazardous material management, worker right-to-know, hazardous waste originators, hazardous material awareness, and specific hazards. Existing environmental training programs conducted at NAVSTA Everett required/recommended by other environmental management plans are summarized in Table 1-2.

Table 1-2: Summary of Existing Training Programs Provided Under Other Environmental Management Plans at NAVSTA Everett

	BMP Title[a]	Management Plan
	Label all drums, cans, containers, tanks, and valves	HWMP
	Restrict access to area and equipment	SPCC
	Control spills	SPCC
	Keep records of all spills and leaks of toxic or hazardous materials	SPCC, SCP
	Do not pour liquids wastes into storm drain	SPCC
	Keep absorbent material on hand	SPCC, HWMP, SCP
	Inspect water accumulated in containment area for oil sheen prior to discharge	SPCC
	Regularly inspect storage areas for leaking materials	SPCC
	Conduct refresher courses in operating and safety procedures	SPCC
	Recycle or properly dispose of all used vehicle fluids	HWMP
	Protect storage containers from being damaged by vehicles	SPCC
	Properly store containers	SPCC, HWMP
	Properly dispose of any significant materials or contaminated waste	HWMP, SCP
	Employ proper handling procedures to transport materials and waste	SPCC
	Provide overfill protection	SPCC
	Monitor major fueling operations	SPCC
	Provide absorbent booms in unbermed fueling areas	SPCC
	Eliminate topping off tanks	SPCC
	Lock fuel tanks when not in use or on standby	SPCC
	Keep tanks, piping, and valves in good condition	SPCC
	Protect tanks from being damaged by vehicles	SPCC
	Protect fill pipe from being damaged by vehicles	SPCC
	Provide secondary containment for ASTs	SPCC
	Regularly inspect and test equipment	SPCC
	Provide good housekeeping practices to minimize pollutants exposure to stormwater	SPCC
	Train employees on proper loading/unloading techniques	SPCC
	Train employees on proper filling and transfer procedures	SPCC
	Label and track the recycling of waste material (i.e., used oil, spent solvents, batteries)	HWMP
	Educate personnel for proper storage, use, cleanup, and disposal of materials	SPCC, HWMP, SCP
	Use appropriate material transfer procedures, including spill prevention and containment procedures	SPCC
	Keep records of required inspections, maintenance activities, employee training sessions, and chemical application rates and locations	SPCC, HWMP, SCP

[a]A complete list and detailed description of stormwater BMPs are provided in SWPPP Section 4.

Key:
AST = Aboveground Storage Tank.
HWMP = Hazardous Waste Management Plan.
SCP = Spill Contingency Plan.
SPCC = Spill Prevention, Control and Countermeasure.

Table 1-3: Stormwater BMPs in Place and/or Required by Other Environmental Management Plans at NAVSTA Everett

Title	Personnel Who Receive Training	Program Provided Under
Hazardous Materials Management	Upper management (Division Managers and higher)	HWMP
Worker Right-to-Know	Supervisors and Employees	HWMP
Hazardous Waste Originators	Supervisors and Employees, Non-Supervisory Personnel[a]	HWMP
Hazardous Material Awareness	Non-Supervisory Personnel[a]	HWMP
Specific Hazard	Non-Supervisory Personnel[a]	HWMP
Courses Relating to HWMP	Collateral Duty and Full Time Safety and Occupational Health Personnel	HWMP
OSHA HAZWOPER 40-hour Training	All Hazardous Waste Operations Personnel	HWMP
Annual OSHA HAZWOPER 8-hour Refresher	All Hazardous Waste Operations Personnel	HWMP
Emergency Response Contingency Training	All Emergency Spill Response Personnel	HWMP
Initial SPCC Training for New Employees and Annual Updates	All employees of NAVSTA Everett and contractors whose jobs involve the storage or handling of petroleum products	SPCC
NEESA Waterborne Incident Cleanup Training (or equivalent)	Waterborne Incident Response Team Members	OPLAN
24-hour Site-Specific Training for Waterborne Response	Waterborne Incident Response Team Members	OPLAN
24-hour Annual Waterborne Refresher Training	Waterborne Incident Response Team Members	OPLAN
40-Hour Initial Off-site Training plus on-the-job training ($\geq$ 40 hours)	Land-Based Incident Response Team Members, NOSCDR	OPLAN
24-Hour Annual Refresher Training for Land-Based Response	Land-Based Incident Response Team Members, NOSCDR	OPLAN
8-Hour Annual First Responder Training	First Responders	OPLAN
NEESA On-Scene Commanders Course (or equivalent)	NOSCDR, OSOTC, and instructors	OPLAN
Instructor Certification from outside sources	NOSCDR, On-Scene OSOTC, and instructors	OPLAN
8-hour Refresher covering latest advances, technologies in incident response, and related topics	NOSCDR, On-Scene OSOTC, and instructors	OPLAN

[a]For personnel occupationally involved with the use and potential exposure to hazardous materials.

Key:
HWMP = Hazardous Materials Control and Management.
NOSCDR = Navy On-Scene Commander.
NEESA = Naval Energy and Environmental Support Activity.
OPLAN = Oil/Hazardous Substance Spill Contingency Operations Plan.
OSHA = Occupational Safety and Health Administration.
OSOTC = On-Scene Operations Team Coordinator.
SPCC = Oil Spill Prevention, Control, and Countermeasure Plan.

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2 Facility Description and Contact Information

2.1 Facility Information

Form 2-1: Naval Station Everett Facility

Facility Location and Industrial Activity(s)		
Name of Facility: Naval Station Everett		
Street: 2000 West Marine View Drive		
City: Everett	State: WA	Zip: 98207-5001
County or Similar Subdivision: Snohomish		
NPDES ID (i.e., permit tracking number): WAR05F001		
Primary Industrial Activity SIC code, Sector, and Subsector (2015 MSGP, Appendix D and Part 8): SIC Code 9711, Sector Q, Subsector Q1		
Co-located Industrial Activity(s) SIC code(s), Sector(s), and Subsector(s)(2021 MSGP, Appendix D): SIC Code 5093, Sector N, Subsector N1; SIC Code [*multiple*], Sector P, Subsector P1		
Latitude/Longitude		
Latitude: 47.9918°N (decimal degrees)	Longitude: 122.2178°W (decimal degrees)	
Method for determining latitude/longitude (check one):		
☐ USGS topographic map (specify scale:_____)		☒ GPS
☐ Other (please specify):_____		
Horizontal Reference Datum (check one):		
☐ NAD 27 ☐ NAD 83 ☒ WGS 84		
Native American tribal lands or Federal Operator status		
Is the facility located on Native American tribal lands? ☐ Yes ☒ No If yes, name of reservation, or if not part of a reservation, indicate "not applicable." _____		
Are you considered a "Federal Operator" of the facility? **Federal Operator** – An entity that meets the definition of "operator" in this permit and is either a department, agency, or instrumentality of the executive, legislative, or judicial branches of the Federal government of the United States or another entity, such as a private contractor, operating for any such department, agency, or instrumentality. ☒ Yes ☐ No		
Estimated area of industrial activity at site exposed to stormwater: 117 (acres)		

Discharge Information
Does this facility discharge stormwater into a MS4? ☐ Yes ☒ No If yes, name of MS4 operator: _____
Name(s) of surface water(s) that receive stormwater from your facility: Port Gardner, Inner Everett Harbor, Snohomish River
Does this facility discharge industrial stormwater directly into any segment of an "impaired water" (see definition in 2021 MSGP, Appendix A)? ☒ Yes ☐ No • If yes, identify name of the impaired water(s) and segment(s), if applicable, and identify the pollutant(s) causing the impairment(s): Snohomish River (2,3,7,8-TCDD in Tissue Medium) • Which of the identified pollutants may be present in industrial stormwater discharges from this facility? None • Has a TMDL been completed for any of the identified pollutants? ☒ Yes ☐ No If yes, please list the TMDL pollutants: Snohomish Estuary/1094/ Ammonia and BOD; Snohomish River Tribs/1993/Fecal Coliform
Does this facility discharge industrial stormwater into a receiving water designated as a Tier 2, Tier 2.5, or Tier 3 water (see definitions in 2015 MSGP, Appendix A)? ☐ Yes ☒ No
Are any of your stormwater discharges subject to effluent limitation guidelines (ELGs)(2015 MSGP Table 1-1)? ☐ Yes ☒ No If Yes, which guidelines apply? _____

2.2 Contact Information/Responsible Parties

Facility Operator

Name: Naval Station Everett
Address: 2000 West Marine View Drive
Everett, WA 98207-5001

Operator/SWPPP Primary Point of Contact

Office: Public Works Department (PWD) Everett
Title: Stormwater Media Manager
Phone: (425) 304-3277

Alternate SWPPP Point of Contact

Office: PWD Everett
Title: Installation Environmental Program Director
Phone: (425) 304-3463

2.3 Stormwater Pollution Prevention Team

The stormwater pollution prevention team titles and designated responsibilities are in Table 2-1. The team is responsible for overseeing the development of this SWPPP and any modifications to it, implementing and maintaining control measures, and taking corrective actions when necessary to address permit violations or to improve the performance of control measures. Team members must have ready access to applicable portions of the MSGP, the most updated copy of the SWPPP, and other relevant documents or information that must be kept with the SWPPP.

Table 2-1: Stormwater Pollution Prevention Team

Title/Position	Individual Responsibility
Commanding Officer	Ensure that stormwater permit requirements, including those associated with the SWPPP, are met.
Public Works Officer	Maintain and inspect stormwater equipment (conveyance system, oil/water separators, etc.) and record/track status. Program funding for routine inspection and maintenance of stormwater system and associated structural stormwater pollution control facilities.
Installation Environmental Program Director	Program funding for compliance with SWPPP and stormwater permit requirements, including upgrades and corrective actions, as required. Submit Discharge Monitoring Reports. Serve as a conduit to other entities at the installation.
Stormwater Manager	Implement and coordinate overall SWPPP program. Ensure best management practices (BMPs) are implemented. Visually examine and monitor outfalls (discharges) and submit reports. Complete facility visual inspections and record results. Coordinate updates to the SWPPP. Ensure annual reports are prepared and submitted.
Oil and Hazardous Substance Spill Manager	Track and report spills.
Naval Facilities Engineering Command (NAVFAC) Northwest Stormwater Media Manager	Provide SWPPP updates upon request, assist with annual report preparation, and provide regulatory and technical assistance as requested by the Stormwater Manager or Installation Environmental Program Director.

Stormwater Team		
Name and/or position, and contact	Responsibilities	I Have Read the MSGP and Understand the Applicable Requirements
Installation Environmental Program Director (425) 304-3463 Insert Email	Program funding to meet SWPPP and MSGP permit requirements, DMR approvals and coordination	☐ Yes Date: Click here to enter a date.
Stormwater Program Manager (425) 304-3277 Insert Email	Implement and coordinate overall SWPPP program. Ensure implementation of best management practices. Visually examine and monitor outfalls (discharges) and submit DMR, Annual, and correspondence to EPA for corrective actions items that exceed the MSGPs timeframe. Ensure sampling requirements are completed and submitted.	☐ Yes Date: Click here to enter a date.
Environmental Division Spill Coordinator (425) 210-8391 Insert Email	Respond to reported spills, investigate cause, aid in control and cleanup and ensure reportable spills are reported to higher authority.	☐ Yes Date: Click here to enter a date.
Environmental Division Waterfront Ops (425) 304-3465 Insert Email	Conduct weekly surveillances of the industrial area on NAVSTA Everett and ensure compliance with required BMPs. Collect weekly inspection forms from PSNS&IMF Det Everett during availabilities and collect stormwater samples IAW the MSGP requirements.	☐ Yes Date: Click here to enter a date.
Environmental Work Center Coordinator (EWCC) Trainer (425) 304-3470 Insert Email	Provide annual training to EWCCs on stormwater BMPs, requirements and current deficiencies.	☐ Yes Date: Click here to enter a date.

Emergency 24-Hour Contact:

NAVFAC ENV (Or 911)
Environmental Division Spill Coordinator
(425) 210-8391

2.4 Site Description

The site description of NAVSTA Everett provides a framework for understanding its surface hydrologic features. It includes the installation mission and location, climate, and stormwater discharge.

2.4.1 Mission and Location

Military and civilian personnel are assigned to commands located at NAVSTA Everett. Its mission is to provide essential maintenance, quality of life services, and operational and material support to tenant activities and U.S. Navy and Coast Guard Forces.

NAVSTA Everett, located about 25 miles north of Seattle in Everett, Washington, is situated on 117 acres of industrial waterfront bordered by the Snohomish River to the west and the East Waterway and Port Gardner to the south (see Figure 2-1). A former pulp and paper mill was located just south of the Naval Station and the Everett Marina is situated on the Snohomish River to the north.

2.4.2 Climate

NAVSTA Everett has a temperate maritime climate with generally mild temperatures and moderate precipitation.

The Western Regional Climate Center website provides historic data from the weather station located nearby NAVSTA Everett at Everett Junior College. Table 2-2 provides annual average precipitation information for the period of August 24, 1894 to June 9, 2016. The source information is available at:

http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?wa2675

Table 2-2: Annual Precipitation Information

Month	Average Maximum Temperature (ºF)	Average Minimum Temperature (ºF)	Average Total Precipitation (inch)	Average Total Snowfall (inch)
Jan	44.9	33.1	4.51	3.3
Feb	48.8	34.4	3.25	1.2
Mar	52.8	36.8	3.57	0.6
Apr	58.1	40.4	2.70	0.2
May	63.6	45.3	2.34	0.0
Jun	68.3	50.2	2.12	0.0
Jul	72.6	52.9	1.04	0.0
Aug	72.7	52.8	1.20	0.0
Sep	67.8	48.3	1.98	0.0
Oct	59.5	43.0	3.39	0.0
Nov	50.9	37.6	4.65	0.6
Dec	45.7	34.3	4.96	1.4
Annual	***58.8***	***42.4***	***35.71***	***7.3***

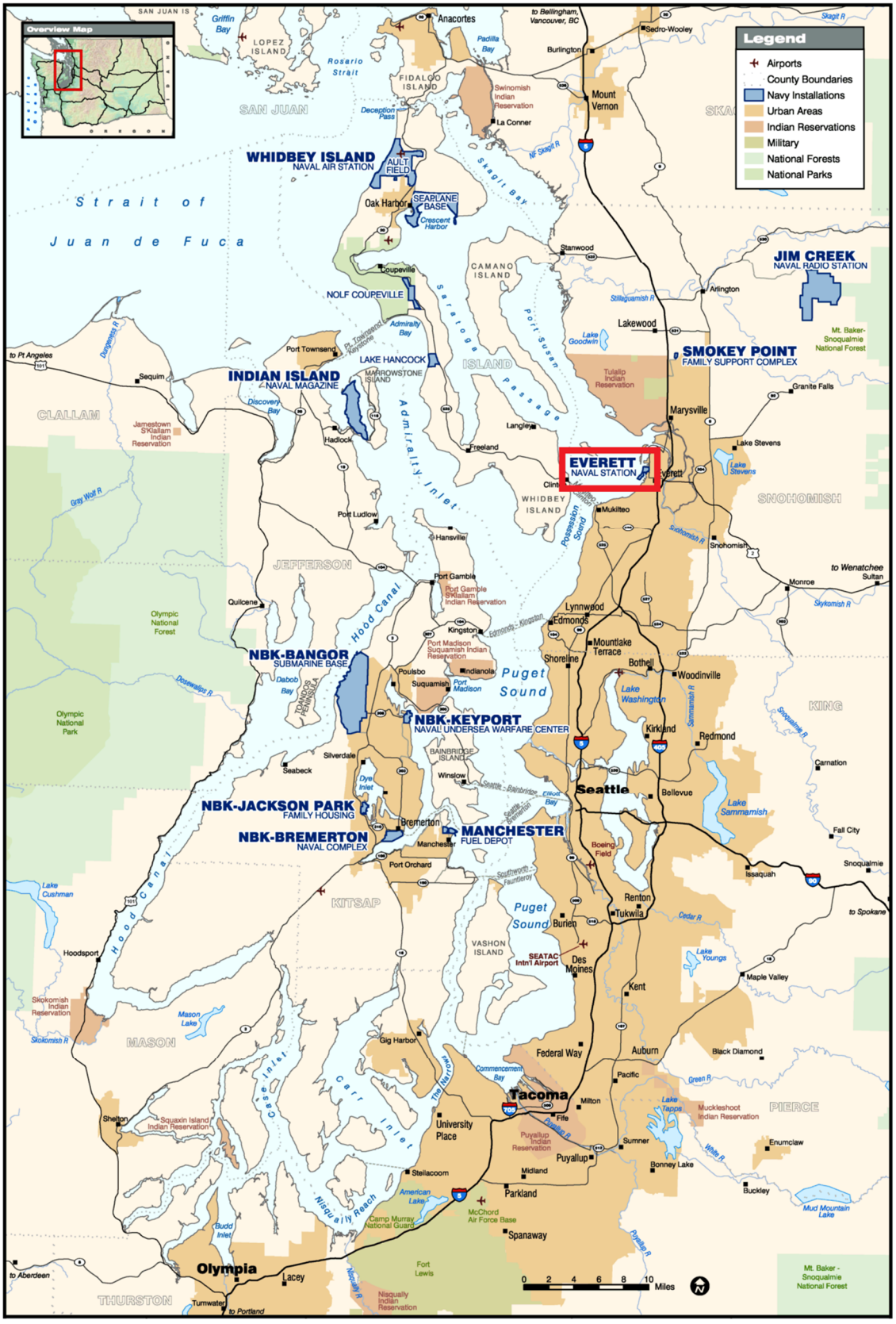

Figure 2-1: Location Map

2.4.3 Receiving Waters and Wetlands

NAVSTA Everett is located at Port Gardner and the Inner Everett Harbor of Possession Sound. The mouth of the Snohomish River flows from north to south along the shore lines of NAVSTA Everett. All the stormwater from NAVSTA Everett drains to these receiving waters.

2.4.4 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 2012 Water Quality Assessment 305(b) report and 303(d) list was approved by the EPA on December 21, 2012. Currently, there are no Total Maximum Daily Loads (TMDLs) established for the NAVSTA Everett receiving waters. Table 2-3 summarizes the assessment for the waters bordering NAVSTA Everett.

Table 2-3: Categories of Bordering Waters

Waterbody ID	Name	Medium	Category	Parameter	Listing ID
1224819475188	Port Gardner and Inner Everett Harbor	Sediment	5	Sediment Bioassay	504342, 504390, 504391
		Water	2	Dissolved Oxygen	10151
			2	Bacteria	15705
			1	Ammonia-N	10150
			1	Temperature	10153
	Snohomish River	Sediment	5	Fluoranthene	614094
			5	Sediment Bioassay	619429
			2	Sediment Bioassay	616932
		Tissue	5	2,3,7,8-TCDD	64445
			1	Mercury	64446

See the following paragraph for a description of the Water Quality Assessment Categories taken directly from the Washington Department of Ecology (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 Ecology's 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 we 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:
  - **Category 4a - Has a TMDL**: Water bodies that have an approved TMDL in place and are actively being implemented.
  - **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.
  - **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 Ecology 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.

2.4.5 Stormwater Drainage

NAVSTA Everett is located at Port Gardner and the Inner Everett Harbor of Possession Sound. Including piers, NAVSTA Everett covers an area of approximately 117 acres. The mouth of the Snohomish River flows from north to south along the shorelines of NAVSTA Everett. Stormwater from NAVSTA Everett drains to these receiving waters.

2.4.5.1 Drainage Area Delineation

NAVSTA Everett is divided into four major drainage areas. Each area has both pervious landscaped or playing field areas and relatively impervious asphalt surfaces and buildings. Each drainage area has its own oil/water separator (OWS) and outfall.

The OWS serving each outfall are large chambers with a dividing corrugated plate that allows water to pass through the bottom while detaining oil. They are designed to intercept and contain oily waste in the event of a large spill. They provide a rudimentary level of treatment by increasing the residence time and allowing particles to settle instead of immediately discharging to receiving waters. For this reason, the OWS are appropriately named oil interceptors.

A network of catch basins and storm sewer lines collect and convey stormwater to one of the four oil interceptors, which then discharges to one of the four outfalls servicing the station. The four drainage areas and their corresponding outfalls are designated as Outfall A, B, C, and D. See Figure A-1 in Appendix A for the outfall locations. Most of the stormwater runoff from NAVSTA Everett passes through one of the four oil interceptors prior to discharge; however, at a few locations sheet flow discharges directly to receiving waters. The notable areas where stormwater is not collected and treated by an oil interceptor are Pier D and E and the marina.

Outfall D also collects off-site stormwater from the parking area of the Port of Everett Marina Village. Outfall C collects off-site stormwater form the City of Everett 21st Street overpass.

2.4.5.2 Impervious Surface Area Estimate

A summary of the drainage areas and impervious area estimates is provided in Table 2-3. Two sources bring off-site inflow to NAVSTA Everett's stormwater system. The total area in Table 2-3 does not include areas of off-site inflow.

Table 2-4: Drainage Area Summary

Outfall	Receives Industrial Area Drainage	Outfall Sampling Location	Receiving Water	Drainage Area (acres)	Percentage Impervious
A	Yes	[redacted]	Port Gardner	20.7	97%
B	Yes	[redacted]	Port Gardner	12.6	95%
C	Yes	[redacted]	Snohomish River	45.8[1]	95%
D	No	[redacted]	Snohomish River	40.8[2]	73%

[1] Total area excludes off-site inflow from City of Everett, 21st Street overpass
[2] Total area excludes off-site inflow from Port of Everett Marina Village

2.4.5.3 Stormwater Outfalls

Outfall A: See Figure A-2 in Appendix A

The drainage area for Outfall A includes Pier A, Pier B, and the South Wharf. Pier A, Pier B, and the South Wharf are sloped, directing stormwater to a trench within the piers and wharf. A sluice gate is located in the stormwater line, prior to the oil/water separator, which can be closed in the event of a spill.

During normal operations (i.e., no spill event), the anticipated pollutants in the discharge from Outfall A include low concentrations of oils, grease, and suspended solids from parking and operating vehicles on the piers and wharf. During ship maintainence availabilities, Piers A and B are used as lay down areas for scaffolding, metals, treated wood, port-a-potties, metal cutting shops, trailers, and holding tanks for effluents. These effluents can come from fuel tank cleanings, vacuum, collection, hold and transfer (VCHT) maintenance, bilge cleanings and other related maintenace. The effluent is often collected into a large tank on the pier and held until analytical analysis is performed for disposal. The capacity of these tanks is approximently 20,000 gallons. Anticipated pollutants in the discharge from Outfall A include run off from the storage of equipment and materials related to the maintainence availability. In the event of a spill, the pollutants are dependent on the spilled material or waste, spill location, and the effectiveness of clean-up efforts. Typical materials and waste handled or transferred on the piers and wharf includes: sewage from the ships; oily wastewater; petroleum, oils, and lubricants (POL); and any material used onboard the vessels berthed at NAVSTA Everett. See Table 4-3 for the list of potential pollutants associated with each building or location.

The main structural pollution control devices in place on the storm sewer system are the oil interceptor, the containment basins around each pipe riser, and the sluice gate.

Preventive maintenance for the drainage area serviced by Outfall A includes: inspecting and cleaning catch basins, inspecting and cleaning the oil interceptor, inspecting the sluice gate for proper operation and repairing as required, and inspecting and cleaning the containment basins.

Outfall B: See Figure A-3 in Appendix A

The drainage area for Outfall B includes the following activities with the potential to contribute to stormwater pollution:

- Recycling Center [redacted]
- Corrosion Control Facility [redacted]
- Helo pad
- Laydown area to the south of Building 2331 and 2330 and to the east of Buildings 2320 and 2310
- Steam Plant [redacted]
- Hazardous material loading area [redacted]
- Puget Sound Naval Shipyard and Intermediate Maintenance Facility (PSNS & IMF), Loading Dock [redacted]
- Industrial Logistics Complex [redacted]

During normal operations (i.e., no spill event), the anticipated pollutants in the discharge from Outfall B would be low concentrations of oils, grease, antifreeze from parking and operating vehicles, and stormwater runoff from recycling operations. Figure A-3, Appendix A, identifies the catch basins located in the drainage area of Outfall B. See Table 4-3 for the list of potential pollutants associated with each building or location.

The main pollution control device is the oil interceptor. Preventive maintenance for the stormwater control and conveyance system for Outfall B includes inspection and cleaning of the oil interceptor and inspecting the operation of the valves leading from the hazardous waste storage area.

Outfall C: See Figure A-4 in Appendix A

The drainage area for Outfall C includes the following activities with the potential to contribute to stormwater pollution:

- North Wharf/Coast Guard/Heavy Equipment parking
- Hazardous Waste Storage Facility [redacted]
- Port Operations [redacted]
- Fleet Readiness Center Northwest (FRCNW) [redacted]
- Transportation Maintenance/PWD [redacted]
- U.S. Coast Guard (USCG) [redacted]
- Sewage attenuation tank [redacted]
- Off-base inflow, 21st Street overpass

Inflow from the City of Everett at and around the 21st Street overpass enters NAVSTA Everett at two locations near the northeast corner.

During normal operations (i.e., no spill event), the anticipated pollutants in the discharge from Outfall C would be low concentrations of suspended solids, antifreeze, and oils and grease from vehicle parking and operations. Figure A-4, Appendix A, identifies catch basins located in the drainage area for Outfall C. See Table 3-3 for the list of potential pollutants associated with each building or location.

The main pollution control devices are the oil interceptor and catch basin filter inserts. Preventive maintenance for stormwater control and conveyance system for Outfall C includes catch basin filter use in the vicinity of construction projects; inspection and cleaning of OWSs at [redacted]; and oil interceptor at Outfall C. See the building descriptions in Table 4-3 for more information on OWSs.

Outfall D: See Figure A-5 Appendix A

The drainage area for Outfall D supports the North Wharf Heavy Equipment Parking and non-industrial facilities consisting of office buildings, living quarters, mess halls, ball fields, and vehicle parking. Off-base inflow from the Port of Everett Marina Village parking lot enters the storm sewer at approximately three locations near the Navy Exchange [redacted]. The Port of Everett provided guidance to the restaurants regarding the storage of cooking oil. Restaurants no longer store cooking oil in the dumpster area outside due to the amount of grease that was finding its way to Outfall D. All cooking grease is now stored inside the restaurant and the amount of grease in Outfall D has significantly decreased. Inspections of the drainage area and catch basins located on NAVSTA Everett, which drain to Outfall D, show that they are clean and well maintained. There are several catch basins in the Port of Everett Marina village located off NAVSTA Everett property that also drains to Outfall D. One of the catch basins drains an area at the Port of Everett Marina Village that contains many recycle and solid waste receptacles. The dumpster area is kept locked after hours and receptacle covers are kept closed. Prior to the new guidelines regarding grease, there was evidence that the dumpster area was washed down with a hose and the wash water drained to Outfall D. There was significant staining on the surface of the asphalt leading to the catch basin, indicating frequent and significant dirty water entering the catch basin.

During normal operations (i.e., no spill event), the anticipated pollutants in the NAVSTA Everett discharge to Outfall D would be low concentrations of oils and grease from parking and operating vehicles, dirt, and small particles.

The main pollution control device in place on the storm sewer system is the oil interceptor. Preventive maintenance for the stormwater control and conveyance system for Outfall D includes inspection and cleaning of the oil interceptor.

2.4.5.4 Substantially Identical Outfalls

The MSGP allows certain exceptions to quarterly visual assessment requirements (SWPPP Section 6.1.1) and benchmark or impaired waters monitoring (SWPPP Section 6.1.5) for discharges from substantially identical outfalls. Outfalls with similar general industrial activities and control measures, similar exposed materials that may significantly contribute pollutants to stormwater, and similar runoff coefficients for their drainage areas are considered substantially identical outfalls.

None of the NAVSTA Everett outfalls are recognized as substantially identical outfalls.

2.4.5.5 Inflow of Off-Base Non-Navy Generated Stormwater

Two sources have been identified that direct off-site inflow to NAVSTA Everett's stormwater system: The City of Everett's 21st Street overpass and the Port of Everett's Marina Village.

21st Street Overpass, City of Everett

Description

The 21st Street overpass and surrounding area contributes stormwater to NAVSTA Everett's stormwater discharge. The drainage area for this stormwater includes the 21st Street overpass, the area beneath the overpass, and a portion of a parking lot adjacent to NAVSTA Everett. However, the parking lot appears to be on Scott Paper property, and inflow from the parking lot enters NAVSTA Everett at a different location than the inflow from the city property.

Stormwater Drainage and Facilities
Stormwater collected from the surface of the 21st Street overpass is piped into NAVSTA Everett's stormwater collection system. Stormwater collected from beneath the overpass enters catch basins and is routed to NAVSTA Everett. Stormwater collected from the adjacent parking lot enters NAVSTA Everett via a rock lined swale in NAVSTA Everett's stormwater collection system; however, this only occurs during periods of heavy rain. Stormwater entering NAVSTA Everett from these locations is discharged to the Snohomish River from Outfall C.

Description of Exposed Significant Materials
No exposed significant materials were seen on the overpass or surrounding area.

Site Assessment Inspection
The first site assessment of the 21st Street overpass and surrounding property was conducted by NAVFAC Northwest and NAVSTA Everett personnel on January 27, 1995.

Existing Stormwater Monitoring Data
Although no monitoring data is available to the Navy, the overpass supports general vehicle traffic. Thus, the following stormwater pollutants could be expected to come from the overpass:

- Copper from brake pads, oil, and grease
- Metals from tire wear (primarily zinc)

Recommended BMPs
Facility BMP #2 is recommended to further reduce the potential for pollution of stormwater runoff at the 21st Street overpass and surrounding area. This BMP establishes spill response procedures calling for the catch basins to be sealed off in the event of a spill or accident on the overpass.

Marina Village, Port of Everett

Description
Marina Village is located to the northwest of NAVSTA Everett. The marina primarily consists of piers, restaurants, shops, and parking lots.

Stormwater Drainage and Facilities
Stormwater from the Marina Village parking lot is collected by catch basins at eight locations and routed into NAVSTA Everett's stormwater collection system. Stormwater entering NAVSTA Everett from the Port of Everett discharges into the Snohomish River from Outfall D. The marina parking lot and associated stormwater collection system is shown in Appendix A, Figure A-5.

Description of Exposed Significant Materials
Exposed significant materials include open rubbish containers.

Site Assessment Inspection
NAVFAC Northwest and NAVSTA Everett personnel conduct routine inspections. Due to the discovery of a significant amount of floating grease in the upstream side of the Outfall D oil interceptor in 2017, the Marina Village, Port of Everett implemented requirements that no longer allow grease to be stored outside in the dumpster area. The Port of Everett conducted training with the restaurants to ensure compliance and labled all storm drains in the Port which drain to NAVSTA Everett. See SWPPP Section 2.4.3.3 Stormwater Outfalls, Outfall D, for a description of the condition on the Port of Everett property near the catch basin that flows to Outfall D.

Existing Stormwater Monitoring Data

No stormwater monitoring data is available to the Navy.

Recommended BMPs

The Marina Village is not under the control of NAVSTA Everett, therefore BMPs at this site are not the responsibility of NAVSTA Everett. Since the lack of stormwater BMPs at this site could affect future benchmark monitoring, it will be included in routine inspections, and NAVSTA Everett will document any problems. For significant problems observed at Marina Village, NAVSTA Everett will contact the Port of Everett, the property owner, for correcting the problems.

3 SWPPP Management and MSGP Compliance

3.1 SWPPP Management

The MSGP mandates the SWPPP availability, revision, recordkeeping and retension, and signatory requirements. A copy of the 2021 MSGP is in Appendix B.

3.1.1 Availability Requirements

This SWPPP will be kept on-site by the NAVSTA Everett Stormwater Program Manager and will be made available upon request to the EPA or an authorized representative.

Public access to SWPPP information is required by the MSGP. The NAVSTA Everett SWPPP is available publicly at the following link:

https://www.cnic.navy.mil/regions/cnrnw/installations/ns_everett/om/naval-station-everett-environmental-policy.html

The publicly available SWPPP contains redactions of restricted information.

3.1.2 Revision Requirements

In accordance with the MSGP, this SWPPP will be amended when there is a change in design, construction, operation, or maintenance of NAVSTA Everett facilities covered by this plan or when there is an addition of a new industrial facility that has a significant effect on the potential for discharge of pollutants. In addition, this SWPPP will be amended if it is ineffective in eliminating or significantly minimizing pollutants from the sources identified.

3.1.3 Recordkeeping and Retension Requirements

Reports, records, and documents required by the MSGP will be included in Appendix A through J of this SWPPP. Alternative recordkeeping locations (online, computer network drive, CD/DVD, etc.) is referenced in the applicable appendix.

The Navy requires retension of this SWPPP, records of monitoring information, copies of reports required by the SWPPP, and records of data used to complete the (NOI) for at least three years after coverage under the permit expires or is terminated.

3.1.4 Signatory Requirements

This SWPPP, the Annual Report to the EPA, Discharge Monitoring Reports (DMRs), inspection reports and documented corrective actions taken as required by Part 3.1 of the MSGP, must be signed and certified by the Installation Commanding Officer or by a duly authorized representative of the Commanding Officer. Detailed signatory requirements are identified in the MSGP, Appendix B, Subsection 11.

This SWPPP's Signature and Certification page is located before the Table of Contents.

3.2 Stormwater Compliance at NAVSTA Everett

The EPA administers NPDES permits associated with stormwater discharges from federal facilities in Washington State.

3.2.1 Compliance for Industrial Activities

NAVSTA Everett originally sought coverage for stormwater discharges under the NPDES Baseline General Permit for Stormwater Discharges Associated with Industrial Activity, published by the EPA on September 9, 1992. The EPA elected not to renew the Baseline General Permit when it expired in 1997 and advised permittees to seek coverage under the 1995 MSGP. NAVSTA Everett sought coverage under the 1995 MSGP in late 1997. The installation submitted NOIs to obtain coverage under subsequent 2000, 2005, and 2008 reissues of the MSGP. In January 2016, NAVSTA Everett submitted the NOI for coverage under the 2015 MSGP. In May 2021, NAVSTA Everett submitted the NOI for coverage under the 2021 MSGP.

A copy of the most recent NOI form and supporting documentation are in Appendix C.

3.2.2 Compliance for Construction Activities

To comply with the construction general permit (CGP), a NOI must be submitted to EPA for any construction activities at NAVSTA Everett that will disturb one or more acres or will disturb smaller sites that are part of a larger common plan of development. Compliance with the CGP requires development of a construction site-specific stormwater pollution prevention plan not related to this SWPPP document. Please refer to the EPA's NPDES General Permit for Discharges from Construction Activities for additional guidance and requirements.

3.2.3 Compliance for Municipal Activities

Stormwater discharges from urbanized non-industrial areas are not covered under the MSGP unless those areas drain to outfalls that also support industrial areas. Concurrent to drafting this SWPPP, the Navy has received permit coverage under a Phase II municipal separate storm sewer system (MS4) permit, which requires the Navy to minimize the discharge of pollutants from its storm sewer systems to the maximum extent practical. Under the permit, the Navy must develop and implement a stormwater management program (SWMP) for covered facilities and include the following control measures: public education and outreach, public participation and involvement, illicit discharge detection and elimination, construction site runoff control, post-construction runoff control, pollution prevention, and good housekeeping. The permit may also include water quality related requirements to address issues such as Total Maximum Daily Loads (TMDL) and to protect designated uses of receiving water bodies.

Although MSGP and MS4 permit coverage of certain areas and activities may overlap, the programs are managed separately. This SWPPP is prepared to meet the requirements of the MSGP.

4 Potential Pollutant Sources

Areas at NAVSTA Everett where industrial materials or activities are exposed to stormwater or from which allowable non-stormwater discharges originate were evaluated for inclusion in this SWPPP. For each of the industrial areas identified, this section provides a description of potential pollutants, spills and leaks, unauthorized non-stormwater discharges, salt storage, and stormwater sampling data collected during the previous permit term.

4.1 Potential Pollutants Associated with Industrial Activity

Industrial activities that occur at NAVSTA Everett include Scrap Recycling (Standard Industrial Classification [SIC] 5093), Land Transportation (SIC 4111), and Water Transportation (SIC 4491, 4493). Typical activities include ship and equipment maintenance and cleaning, refueling, wastewater transfer from ships, and recycling.

The industrial facilities at NAVSTA Everett are associated with one (or more) of three industrial sectors defined in the MSGP, including:

- Sector N: Scrap Recycling and Waste Recycling Facilities
- Sector P: Land Transportation and Warehousing
- Sector Q: Water Transportation

As documented throughout the SWPPP, the majority of NAVSTA Everett's industrial activities take place indoors, which minimizes potential stormwater contamination. Industrial processes conducted at NAVSTA Everett that do not fall under a defined sector in the MSGP are not directly addressed in the SWPPP.

Table 4-1 identifies the location and name of current industrial facilities at NAVSTA Everett, the applicable industrial sector(s) as defined in the MSGP, and the associated outfalls.

Table 4-1: Industrial Facilities, Associated Outfalls, and Applicable Permit Sectors

Facility/ Location	Facility Name	Industrial Sector(s)	Associated Outfall(s)
Pier A	[redacted]	Q	A
Pier B	[redacted]	Q	A
Pier D	[redacted]	Q	Direct Discharge
Pier E	[redacted]	Q	Direct Discharge
Laydown Area	[redacted]	P	B
South Wharf	[redacted]	Q	A
North Wharf (North)	[redacted]	P	C & D
North Wharf (South)	[redacted]	Q	C
Outfall A	[redacted]	Q	A
Outfall B	[redacted]	N, P, Q	B
Outfall C	[redacted]	P, Q	C
Outfall D	[redacted]	P	D
2108	[redacted]	Q	C
2109	[redacted]	Q	Direct Discharge
2121	[redacted]	P	C

Facility/ Location	Facility Name	Industrial Sector(s)	Associated Outfall(s)
2125	[redacted]	Q	C
2130	[redacted]	P	C
2132	[redacted]	P	C
2150	[redacted]	P	C
2155	[redacted]	Q	C
2162	[redacted]	Q	C
2200	[redacted]	P	B & C
2202	[redacted]	Q	B & C
2222	[redacted]	Q	C
2300	[redacted]	Q	B
2310	[redacted]	P	B
2320	[redacted]	Q	B
2330	[redacted]	Q	B
2331	[redacted]	N	B
2400	[redacted]	Q	Sanitary Sewer

4.2 Spills and Leaks

The MSGP requires permittees to identify past spills and leaks. Significant spills and leaks of POLs or hazardous substances that occurred at exposed areas or that drained to a stormwater conveyance during the prior three years are identified in Table 4-2. Significant spills and leaks include, but are not limited to, releases of oil or hazardous substances in excess of quantities that are reportable under Clean Water Act (CWA) Section 311 (see 40 CFR 110.6 and 40 CFR 117.21) or Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 USC §9602.

Table 4-2: Past Significant Spills and Leaks, 2018-2020

Date	Location	Material	Incident Description	Discharge Point(s) Affected
2/16/2018	[redacted]	Cooking grease	Cooking grease from the Port of Everett restraurant accumulated in Outfall D from inproper storage and spills occurring in the parking lot during transfer to the dumpster area, A 55 gallon drum worth of cooking grease was remove from the inlet side of Outfall D.	Outfall D
8/13/2018	[redacted]	Cooking grease	When the contractor was emptying the large grease container, when he pulled his hose off, the grease in the hose emptied into the street and towards the storm drain. Recycling and ENV personnel prevented it from entering the stormdrain and cleaned it up.	n/a
12/17/2018	[redacted]	oil	duirng Outfall inspections, it was discovered there was a light oil sheen on the inlet side of Outfall C	Outfall C
12/21/2018	[redacted]	oil	A large oil rainbow sheen was discovered in the parking lot. ENV personnel cleaned it up and prevented it from entering the storm drain system.	n/a

Date	Location	Material	Incident Description	Discharge Point(s) Affected
3/15/2019	[redacted]	Gasoline	NAVSTA Everett security boat experienced a mechanical failure in which the fuel hose on the outboard motor came loose causing about a cup of gasoline to enter Gardner Bay. Rainbow oil sheen was about 10 ft by 10 ft. Message sent	Port Gardner Bay
8/10/2019	[redacted]	Oil/Fuel Product	A pickup truck had a used uncovered oil tank in the bed of the truck which overfilled and spilled onto the ground during a rain event. Less than a pint of oil/ fuel was spilled.	Outfall D
8/10/19	[redacted]	Gasoline	Gas Station pump nozzle was pulled off and spilled gasoline onto the ground. Spill was cleaned up before entering any storm drains.	n/a
11/26/2019	[redacted]	Gasoline	During refueling of a private vehicle, the gas tank overfilled causing gasoline to spill on to the ground. Spill was cleaned up by Hazardous Waste personnel and no gasoline entered the storm drain system. It was approximently half a gallon spilled.	n/a
3/21/2020	[redacted]	Unauthorized car wash effluent	Sailor was washing his car with soap and effluent drained to the storm drain	Outfall D
10/27/2020	[redacted]	Comp water and fuel	USS KIDD was refueling when the comp water barge plugs disconnected due to back pressure from comp water system. Volume of spill was 5-10 gallons. Spill was kept inside the boom and recovered with oil absorbant pads. Message sent.	Port Gardner Bay

The MSGP additionally requires documentation of industrial facilities where potential spills and leaks could contribute pollutants to stormwater discharge and the corresponding outfall(s) likely to be affected. These facilities, their potential pollutants, and associated outfalls are described in Table 4-3. Maps identifying the layout of facilities and their surrounding areas are provided in Appendix A.

Table 4-2 (continued): Significant Spills and Leaks, 2021 - present

Date	Type	Substance	Quantity Estimate	Exposed Area	Spill Entered
mm/dd/yy	☐ Spill ☐ Leak	☐ Oil ☐ Fuel ☐ Wastewater ☐ Toxic ☐ Hazardous ☐ Other	☐ Less than 1 Gallon ☐ 1 to 2 Gallons ☐ 2 to 5 Gallons ☐ 5 to 10 Gallons ☐ Greater than 10 Gallons	Facility Area	☐ Outfall ☐ Catch Basin ☐ RWB (water) ☐ Pavement ☐ Soil
mm/dd/yy	☐ Spill ☐ Leak	☐ Oil ☐ Fuel ☐ Wastewater ☐ Toxic ☐ Hazardous ☐ Other	☐ Less than 1 Gallon ☐ 1 to 2 Gallons ☐ 2 to 5 Gallons ☐ 5 to 10 Gallons ☐ Greater than 10 Gallons	Facility Area	☐ Outfall ☐ Catch Basin ☐ RWB (water) ☐ Pavement ☐ Soil
mm/dd/yy	☐ Spill ☐ Leak	☐ Oil ☐ Fuel ☐ Wastewater ☐ Toxic ☐ Hazardous ☐ Other	☐ Less than 1 Gallon ☐ 1 to 2 Gallons ☐ 2 to 5 Gallons ☐ 5 to 10 Gallons ☐ Greater than 10 Gallons	Facility Area	☐ Outfall ☐ Catch Basin ☐ RWB (water) ☐ Pavement ☐ Soil
mm/dd/yy	☐ Spill ☐ Leak	☐ Oil ☐ Fuel ☐ Wastewater ☐ Toxic ☐ Hazardous ☐ Other	☐ Less than 1 Gallon ☐ 1 to 2 Gallons ☐ 2 to 5 Gallons ☐ 5 to 10 Gallons ☐ Greater than 10 Gallons	Facility Area	☐ Outfall ☐ Catch Basin ☐ RWB (water) ☐ Pavement ☐ Soil
mm/dd/yy	☐ Spill ☐ Leak	☐ Oil ☐ Fuel ☐ Wastewater ☐ Toxic ☐ Hazardous ☐ Other	☐ Less than 1 Gallon ☐ 1 to 2 Gallons ☐ 2 to 5 Gallons ☐ 5 to 10 Gallons ☐ Greater than 10 Gallons	Facility Area	☐ Outfall ☐ Catch Basin ☐ RWB (water) ☐ Pavement ☐ Soil
mm/dd/yy	☐ Spill ☐ Leak	☐ Oil ☐ Fuel ☐ Wastewater ☐ Toxic ☐ Hazardous ☐ Other	☐ Less than 1 Gallon ☐ 1 to 2 Gallons ☐ 2 to 5 Gallons ☐ 5 to 10 Gallons ☐ Greater than 10 Gallons	Facility Area	☐ Outfall ☐ Catch Basin ☐ RWB (water) ☐ Pavement ☐ Soil

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Table 4-3: Industrial Facilities, Potential Pollutants, and Associated Outfalls

Building #	Building/ Location	Sector	Description	Potential Pollutants	Exposed Materials Storage or Process	Spill/Leak Potential	Associated Outfall	Summary of Past Spills	Appendix A
n/a	[redacted]	Q	[redacted] has the capacity to berth an aircraft carrier and four destroyers. Laydown areas on the wharves and piers are provided adjacent to the ships' berths for the staging of materials. Off-loading of collection, holding, and transfer (CHT) waste and bilge water takes place on the pier. In addition to the offloading of waste and restocking of supplies, ships may undergo intermediate and depot level maintenance while moored Refueling and lube oil transfer operations take place on the pier. Refueling is done from the water via a barge while lube oil transfers take place on the pier from a tanker truck. Stormwater from [redacted] is directed via sheet flow to a central trench that runs along the length of the pier.	POLs Sewage Solvents Metals Paints Cleaners	Heavy equipment, parts staging, open dumpsters.	High	Outfall A Figure A-2	4/17/09: Gray green sheen sighting, total area 20 ft x 50 ft	Figure A-6
n/a	[redacted]	Q	[redacted], which is approximately 2,000 feet long, has the capacity to berth four surface combat vessels other than carriers. In addition to the offloading of waste and restocking of supplies, ships may undergo intermediate and depot level maintenance while moored. Laydown areas on the wharves and piers are provided adjacent to the ships' berths for staging of materials. Off-loading of sewage and bilge water from the ships also takes place on the pier. Refueling and lube oil transfer operations take place on the pier. Refueling is done from the water via a barge while lube oil transfers take place on the pier from a tanker truck. Stormwater from [redacted] is directed via sheet flow to a trench drain that runs along the west side of the pier.	POLs Sewage Solvents Metals Paints Cleaners	Heavy equipment, parts staging, open dumpsters.	High	Outfall A Figure A-2	None	Figure A-7
n/a	[redacted]	Q	[redacted] is a concrete decked pier that provides berthing for oil spill response boats, temporary tug moorage, and serves as a temporary ferry terminal. Port Operations uses the pier for oil boom maintenance/cleaning and other response boat needs. Stormwater drains through gaps in the deck into the East Waterway. Non-Stormwater BMP, Non-SW-6, located in SWPPP Table 4-1 addresses oil boom pressure washing operations that take place on [redacted].	POLs Metals	Boom Washing	Low	Direct Discharge	None	Figure A-8
n/a	[redacted]	Q	[redacted] pier that provides berthing for a boathouse that Port Operations uses for storage their equipment and small surface crafts. In addition to the boathouse, two barges and a floating dock on the east side of the pier are used by Port Operations. A floating dock on the west side of the pier is used for berthing tugs. Stormwater drains through gaps in the wood planks into the East Waterway.	POLs Sewage	Sewage tank at end of pier without secondary containment	Medium	Direct Discharge	1/9/09: 1.5 gallons petroleum product, caused by piston failure in port outboard motor	Figure A-9
n/a	[redacted]	P	A designated laydown area provides shore-side storage of general equipment, brows, stairs, dumpsters, and berthing supplies. The laydown area is located adjacent to the helipad and the recycling center.	Metals	Scrap metal and obsolete equipment exposed to stormwater	Medium	Outfall B Figure A-3	None	Figure A-10
n/a	[redacted]	P	Stormwater from the area surrounding the PSNS & IMF Annex is directed via sheet flow to a trench drain that runs along the center of the south wharf. Stormwater then enters the storm sewer and flows through an OWS that leads to Outfall A. A sluice gate in the storm sewer line provides emergency cutoff in the event of a large spill on the wharf. The steel PSNS & IMF Annex building straddles a portion of the trench drain. The section of trench drain that runs under the facility is covered with rubber-backed plywood to prevent the entry of contaminants.	POLs Metals Paints Cleaners Solvents	Metals and machinery are staged outside	High	Outfall A Figure A-2	None	Figure A-11

Building #	Building/ Location	Sector	Description	Potential Pollutants	Exposed Materials Storage or Process	Spill/Leak Potential	Associated Outfall	Summary of Past Spills	Appendix A
n/a	[redacted]	P	The northern portion of the wharf provides parking for buses and large equipment and vehicles.	POLs Metals	Scrap metal recycling bin with no cover, and heavy equipment parking.	Medium	Outfall C & D Figure A-4 & A-5	None	Figure A-12
n/a	[redacted]	Q	The southern portion of the wharf provides moorage for [redacted] vessels, buoy storage, storage of other equipment, and ship maintenance (including over water blasting and painting).	POLs Solvents Cleaners Paints	Scrap metal recycling bin with no cover	Medium	Outfall C Figure A-4	None	Figure A-12
[redacted]	[redacted]	Q	[redacted] uses this facility for maintenance and loading/unloading (L/UL) of small craft. Regular types of maintenance are performed such as cleaning, painting, lubrication, oil/filter change, etc. Boat rinsing is also done in this area. Materials are stored both within the building and outside in mobile storage lockers with built-in secondary containment.	POLs Solvents Cleaners Paints	Boat rinsing, and materials are stored outside on the side of the building	Medium	Outfall C Figure A-4	None	Figure A-13
[redacted]	Port Operations	Q	This is a boat house used to store Port Operations boats. Boat rinsing, fueling, and storage are available at this facility.	POLs	Boat rinsing and fueling	High	Direct sheet flow	2010: 50 gallons from a Port Operations boat	Figure A-9
[redacted]	Bio-diesel Fuel Station	P	This fueling station is used to fuel vehicles for operations and a fuel truck that delivers fuel to stationary fuel tanks on the facility. This facility is also used as secondary containment for the fueling truck when it is not in use.	POLs	Fueling and fueling truck storage	Medium	Outfall C Figure A-4	None	Figure A-14
[redacted]	Port Operations	Q	The primary function [redacted] is management of the safe berthing of ships and coordination of the provision of services to ships in port. Administrative functions are housed in the southern portion of the building, and four maintenance bays are located at the north end. Small boats used in NAVSTA Everett Port Operations are stored and maintained inside the maintenance bays. A vehicle wash rack draining to the sanitary sewer is located outside just north of the maintenance bays, and a separate covered fueling station is located approximately 50 feet east of the maintenance bays. A sump in the fueling station leads directly to an OWS located in the parking lot between [redacted] This OWS is cleaned annually.	POLs Solvents Metals Acids Paints	None	Low	Outfall C Figure A-4	None	Figure A-14
[redacted]	Fleet Readiness Center Northwest	P	This facility provides for intermediate level maintenance, repair, and storage of GSE, commonly called "yellow gear,". The facility allows for training of ships' personnel in these repair functions. The mission of the FRCNW is to provide support to active fleet ships and Naval Reserve Force ships in preventative maintenance, repair, and training. The facility can train and improve the maintenance skills of reserve personnel in specific technical areas such as hulls, mechanical and electrical systems, electronics, weapons, ordnance, and emergency repair.	POLs Solvents Metals Paints	None	Medium	Outfall C Figure A-4	None	Figure A-15

Building #	Building/ Location	Sector	Description	Potential Pollutants	Exposed Materials Storage or Process	Spill/Leak Potential	Associated Outfall	Summary of Past Spills	Appendix A
[redacted]	Transportation Maintenance/ Public Works	P	[redacted] houses Transportation Maintenance and Public Works. The northwest side of the building has a vehicle service bay used for maintenance of NAVSTA Everett vehicles. Offices housing both Public Works and Transportation personnel are also located in the building. A significant portion of the building is devoted to storage of Public Works materials. The Public Works facilities include general shop support for the maintenance of buildings, utilities, roadways, and site improvements. Space is also provided for on-site administration and storage of goods. Transportation Maintenance conducts maintenance of NAVSTA Everett assigned vehicles, including vehicles used for commuting between waterfront and non-waterfront sites.	POLs Solvents Acids Metals Paints	Materials are stored outside behind the building	Medium	Outfall C Figure A-4	None	Figure A-16
[redacted]	Hazardous Waste Storage Facility	P	The hazardous waste storage area provides sorting, storage, and shipment of ship and shore generated hazardous waste. Materials are categorized and separated for storage inside of separate bays at [redacted]. Trench drains inside of this building lead to a 20,000-gallon underground storage tank that would provide containment in the event of a major spill. Spill response materials are kept on location for spill response throughout NAVSTA Everett.	POLs Solvents Metals Paints Acids Caustics		Low	Outfall C Figure A-4	None	Figure A-17
[redacted]	USCG	Q	[redacted] is the home to USCG Cutter Support Team for the Henry Blake. This building has offices and storage areas for maintenance equipment. There is a maintenance bay, but it is filled with maintenance tools and equipment. There is an outside hose for rinsing salt water off small boats. This drains to Outfall C.	POLs Solvents Paints		Low	Outfall C Figure A-4	None	Figure A-18
[redacted]	USCG	Q	[redacted] is the USCG Cutter Support Team for the Blue Shark. The building is equipped with a maintenance bay where they keep hazardous materials (HAZMAT) on secondary containment. There is an outside hose for rinsing salt water off small boats. This drains to Outfall C. There is a mop and bucket outside. The bucket has a bottom drain. The mop is used for cleaning the floor of the inside of the maintenance area. This water flows into a drain inside the building that goes to the sanitary sewer.	POLs Solvents Paints		Low	Outfall C Figure A-4	None	Figure A-19
[redacted]	Industrial Logistics Complex	P	The Defense Logistics Agency (DLA) and PSNS & IMF share tenancy of [redacted]. The DLA handles logistical support services while PSNS & IMF handles intermediate maintenance of fleet ships. [redacted] DLA functions include customer and technical services, requisition input/service, fleet repairables assistance, local purchase of high priority material, receiving operations, SERVMART, limited storage for bulk and high volume and/or demand based materials, and personal property office space for shipboard personnel. PSNS & IMF uses a portion of the building for offices and classrooms. PSNS & IMF provides the intermediate maintenance of ships stationed at NAVSTA Everett: welding, sheet metal working, marine engine repair, machine shop services, and electronics repair services.	POLs Solvents Paints Acids		Low	Outfall B & C Figure A-3 & A-4	None	Figure A-20
[redacted]	PSNS & IMF, FISC	Q	FISC and PSNS & IMF share tenancy of [redacted]. FISC handles logistical support similar to DLA. A portion of the building houses a Navy dive shop. PSNS & IMF functions within this building include welding, sheet metal working, marine engine repair, machine shop services, and electronics repair services. On the west side of the building, FISC operates the Hazardous Substance Minimization (HAZMIN) Center. The HAZMIN center controls the flow of hazardous materials for NAVSTA Everett. Hazardous materials are stored for disbursement in rooms provided with floor sumps. Materials are brought into the HAZMIN center, via a ramp, from the loading area on the west side of the building.	POLs Solvents Metals Paints Acids Particulate	Materials containing metals are stored outside	Medium	Outfall B & C Figure A-3 & A-4	None	Figure A-21
[redacted]	Sewage Lift Station	Q	The sewage lift station handles the CHT of sewage from the ships berthed at NAVSTA Everett. A holding tank is used to accommodate surge volumes of sewage. Odor control is accomplished by evacuating holding tank and lift station vapors with a blower to remove gas through a biofilter.	Acids		Low	Outfall C Figure A-4	None	Figure A-22

Building #	Building/ Location	Sector	Description	Potential Pollutants	Exposed Materials Storage or Process	Spill/Leak Potential	Associated Outfall	Summary of Past Spills	Appendix A
			Ferric chloride is metered into the lift station to reduce the formation of hydrogen sulfide when waste is pumped into the city of Everett system.						
[redacted]	Steam Plant	Q	The steam plant provides steam and compressed air to berthed ships. The Steam Plant stores a variety of chemicals and lubricants used for boiler water conditioning and boiler/compressor maintenance.	POLs Acids Caustics		Low	Outfall B Figure A-3	None	Figure A-23
[redacted]	Ship Support Equipment	P	This building provides storage for equipment such as potable water hoses, clamps, and power cables. The interior of the building has concrete floors, similar to most warehouse facilities. An outside storage area is on the east side of the building covered by an awning. The building is surrounded by asphalt.	POLs		Low	Outfall B Figure A-3	None	Figure A-24
[redacted]	Hose Cleaning Facility	Q	The Hose Cleaning Facility provides cleaning and draining of bilge water, CHT, steam, and potable water hoses. [redacted] is divided into halves, with one side servicing only potable water hoses with chlorine and the other side servicing hoses transporting CHT, oil waste, and steam with a citrus based cleaner.	POLs Cleaners	Exposed metal storage on east side of building	Low	Outfall B Figure A-3	None	Figure A-25
[redacted]	Corrosion Control Facility	Q	The Corrosion Control Facility operates in a pre-engineered metal frame building. Metal parts are brought to the facility and sandblasted to remove old paint prior to recoating using one of two processes involving either a molten plastic type material or an electrostatically charged coating process. Within the building are trailers and booths used for office spaces, sandblasting and coating application spaces, showering/decontamination, and storage.	POLs Particulates Paints	Sandblast grit from collection system on south side of building	Medium	Outfall B Figure A-3	None	Figure A-26
[redacted]	Recycling Center	N	NAVSTA Everett Recycling Center operates in a pre-engineered metal frame building located northwest of the Helo Pad within the Outfall B drainage area. Cardboard, paper, glass, plastic, and scrap metals are sorted, crushed, and stored on-site prior to sale to off-site recyclers.	Metals	Scrap metal staging area on east side of building exterior	High	Outfall B Figure A-3	None	Figure A-27
[redacted]	Oil/Water Separator	Q	The oil/water separator is a pretreatment plant for ships' bilge water prior to release to the sanitary sewer. Stormwater drainage of the oil/water separator is provided by a self-contained stormwater collection system. Stormwater from this facility is sent to holding tanks and then into the sanitary sewer. Stormwater from this facility comes into contact with bilge water; however, because all stormwater is contained within the facility treatment process, such exposure is not considered significant for stormwater pollution prevention purposes.	POLs	55-gal drums of POLs stored outside	High	Sanitary Sewer	None	Figure A-28
	*Undesignated storage/laydown/parking areas. Indicates the area is near the numbered facility. Sector N: Scrap Recycling and Waste Recycling Sector P: Land Transportation and Warehousing Sector Q: Water Transportation POLs – Petroleum, Oils, and Lubricants L/UL – Loading/Unloading TSS – Total Suspended Solids								

4.3 Unauthorized Non-Stormwater Discharges

An evaluation of non-stormwater discharges was conducted at NAVSTA Everett in fiscal year 2017, in conjunction with the Illicit Discharge Detection and Elimination (IDDE) program review in accordance with the MS4 permit. Major objectives of this evaluation were (a) to identify permitted and unpermitted non-stormwater entries into the stormwater system and (b) to identify and evaluate controls to reduce the discharge of unpermitted discharges to the maximum extent practicable.

Typical unpermitted non-stormwater entries include sanitary wastewater or septic system seepage, non-contact or contaminated industrial process waters, household toxics, glycols, detergents, POLs from vehicle repair shops and storage areas, and runoff from pesticide or fertilizer applications. The method of entry can be through direct connections (where illicit discharges are plumbed directly to the drainage system), by indirect entry (through below-grade system infiltration), or from spills (through overland flow into catch basins).

Specific procedures used during the non-stormwater discharge evaluation included:

- Review and confirmation of existing sanitary and stormwater facility maps to identify potential non-stormwater illicit discharges or cross-connections to the system
- Dry weather inspection and testing of outfalls-of-concern identified in the field
- Assessment of work practices at industrial facilities-of-concern

Methodologies used to conduct the evaluation, study findings, and recommendations are detailed in the 2017 IDDE Survey. The IDDE survey report is saved on the command share drive at the following location:

U:\SITES\EFANW\Enviro\Stormwater\MS4\before 2018\Minimum Control Measures\MCM 3 - IDDE\2017 Reports\Final Reports

During the study, dry weather flows observed at Outfall B were determined to be derived from groundwater seeps. No other discharges were observed at NAVSTA Everett catch basins and outfalls during the dry weather inspections. As a result, the dry weather inspections did not indicate the presence of any illicit discharges.

NAVSTA Everett was designed and constructed with the intent that no unapproved non-stormwater be discharged from the facility to receiving water bodies. Building designs were altered to remove the use of floor drains prior to construction, and efforts were made to ensure that the few remaining floor drains discharged to the sanitary sewer.

As a result of the design effort to remove any source of industrially generated non-stormwater discharge and based upon the findings of the non-stormwater discharge investigation, no improper plumbing connections that would introduce wastewater into the storm sewer are believed to exist at NAVSTA Everett.

Not all non-stormwater discharges are considered unauthorized. The MSGP authorizes certain non-stormwater discharges. Allowable non-stormwater discharges and BMPs are in Table 4-4. These BMPs apply base-wide.

Table 4-4: Allowable Non-Stormwater Discharges

Type of Non-Stormwater Discharge	Location of Discharge	Non-Stormwater Discharge BMP
Fire Hydrant Flushing	Fire hydrant flushing is conducted during monthly preventative maintenance schedules throughout NAVSTA Everett.	Remove trash/litter prior to flushing. Do not flush in areas where spills have occurred unless all spilled material has been removed.
Landscape Watering	Landscape watering is performed on an as needed basis during the non-rainy season throughout NAVSTA Everett.	Apply pesticides, herbicides, and fertilizers in accordance with manufacturer's instructions.
External Building Washdown	External building washdown occurs on an as needed basis using water only. Buildings are occasionally washed (using either a pressure washer or hose) to remove dirt, debris, and mildew/mold.	Examine building prior to washing checking for: (1) Staining not from a known source. For example, staining under a vent should be investigated prior to washing. (2) Chipping/peeling paint that would release into the wash water. (3) Asbestos siding. Do not use detergents or disinfectants in the washing process.
Pavement Wash Water	Base-wide. The Wharfs are rinsed occasionally using potable water to remove bird waste, accumulated shells left by the gulls, and dirt. Other pavements (roads, parking lots) are not typically washed.	Remove trash/litter prior to washing. Do not use detergents. Do not wash areas where spills have occurred unless all spilled material has been removed.
Building Foundation Drains	Base-wide.	Inspect all visible foundation drains for potential sources of stormwater contamination.
Containment Boom Pressure Washing	This BMP applies to removal of sea growth from oil containment booms staged on the piers at this facility.	The following restrictions apply: Only use potable water in the pressure washer. Do not use detergents, soaps, disinfectants, or solvents. Booms 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.
Boat Rinsing to Remove Saltwater	Small boats are occasionally rinsed using a hose to remove salt water.	Examine boat exterior prior to washing checking for: • Staining not from a known source • Chipping/peeling paint that would release into the wash water Rinse using only potable water. Do not use detergents or disinfectants in the washing process.
1 Non-Stormwater Discharge BMPs located in SWPPP Table 4-1.		

Instructions (see MSGP Part 6.2.3.4):

By the end of the first year of your permit coverage under this permit, you must inspect and document all discharge points at your facility as part of the SWPPP.

Date	Outfall ID	Evaluation Criteria	Unauthorized Discharge	Type	Corrective Action Taken	Corrective Action (CA) Response
mm/dd/yy	ID No.	☐ Site Visit ☐ Inspection ☐ EMS Audit ☐ Reported ☐ Other	☐ Yes ☐ No	☐ Spill ☐ Leak ☐ Toxic ☐ Hazardous ☐ Wastewater ☐ Other ☐ NA	☐ Yes ☐ No ☐ NA	☐ Clean-Up ☐ Report to Gov ☐ Training ☐ Implement new BMP ☐ Retrofit Existing BMP ☐ NA
mm/dd/yy	ID No.	☐ Site Visit ☐ Inspection ☐ EMS Audit ☐ Reported ☐ Other	☐ Yes ☐ No	☐ Spill ☐ Leak ☐ Toxic ☐ Hazardous ☐ Wastewater ☐ Other ☐ NA	☐ Yes ☐ No ☐ NA	☐ Clean-Up ☐ Report to Gov ☐ Training ☐ Implement new BMP ☐ Retrofit Existing BMP ☐ NA
mm/dd/yy	ID No.	☐ Site Visit ☐ Inspection ☐ EMS Audit ☐ Reported ☐ Other	☐ Yes ☐ No	☐ Spill ☐ Leak ☐ Toxic ☐ Hazardous ☐ Wastewater ☐ Other ☐ NA	☐ Yes ☐ No ☐ NA	☐ Clean-Up ☐ Report to Gov ☐ Training ☐ Implement new BMP ☐ Retrofit Existing BMP ☐ NA
mm/dd/yy	ID No.	☐ Site Visit ☐ Inspection ☐ EMS Audit ☐ Reported ☐ Other	☐ Yes ☐ No	☐ Spill ☐ Leak ☐ Toxic ☐ Hazardous ☐ Wastewater ☐ Other ☐ NA	☐ Yes ☐ No ☐ NA	☐ Clean-Up ☐ Report to Gov ☐ Training ☐ Implement new BMP ☐ Retrofit Existing BMP ☐ NA

4.4 Salt Storage

The MSGP requires that the location of any storage piles containing salt used for deicing or other commercial or industrial purposes, including maintenance of paved surfaces, be documented. NAVSTA Everett utilizes sand, as opposed to salt, for deicing roads and paved lots. When not in use, the sand is stockpiled at North Wharf/Heavy Equipment [redacted] to the west of [redacted]. Small quantities of salt are maintained at individual shops and units for localized deicing of walkways and shop entrances. When not in use, the salts are containerized and stored to minimize exposure to storm events.

BMPs C-7, Salt Storage Piles (Core BMP), is included in SWPPP Section 5, Table 5-1.

4.5 Sampling Data Summary

Under the prior permit authorization (2008 MSGP), the benchmark values assigned to certain metals were dependent on the hardness of the receiving waters. NAVSTA Everett receiving waters at Outfall A, B, and C were monitored during the first sampling event of the permit period. Results of hardness monitoring are in Table 4-5. Hardness monitoring is not required due to discharging of stormwater runoff to salt water.

Table 4-5: Hardness Monitoring During Previous Permit Term

Outfall	Parameter	Units	5 Nov 2009
A	Hardness	mg/L as $CaCO_3$	780
B	Hardness	mg/L as $CaCO_3$	430
C	Hardness	mg/L as $CaCO_3$	1500

Notes:
$CaCO_3$: Calcium Carbonate
mg/L: milligram per liter

4.5.1 Past Quarterly Monitoring

During the prior permit authorization, industrial sector-specific quarterly benchmark monitoring was required at Outfall A, B, and C. Table 4-6 summarizes the quarterly benchmark monitoring results obtained during the permit term.

4.5.2 Past Impaired Waters Monitoring

Under the 2008 MSGP authorization, NAVSTA Everett was not required to conduct impaired water monitoring.

The 2012 Washington State Water Quality Assessment listed Port Gardner and Inner Everett Harbor as a Category 5 Impaired Water for Sediment Bioassay and the Snohomish River as a Category 5 Impaired Water for Sediment Fluoranthene and Sediment Bioassay. These sections of impaired water are located adjacent to NAVSTA Everett but are not discharged to or from the facility's outfalls.

Per 2015 MSGP Part 6.2.4.1, no monitoring is required when a water body's biological communities are impaired but no pollutant, including indicator or surrogate pollutants, is specified as causing the impairment.

4.5.3 Past Monthly Benchmark Monitoring

In a 13 May 2010 letter, the EPA mandated additional monthly benchmark monitoring for copper and zinc at Outfall A, B, and C. Monthly samples were averaged on a quarterly basis and compared to lowered benchmark levels required by EPA. Sampling could cease if four consecutive quarterly average values were below the benchmark.

Table 4-6 identifies quaretly aluminum, lead, iron, COD, and TSS stormwater monitoring results.

EPA established a benchmark of 117 µg/L for zinc and 14 µg/L for copper.

Table 4-7 identifies monthly zinc and copper monitoring results during fiscal years 2017 - 2020.

Table 4-6: Quarterly Benchmark Monitoring Results From Previous Permit Term

Outfall	Parameter	Units	Benchmark	1/17/2017	6/8/2017	1 Jul 2017 to 30 Sep 2017	10/17/2017	1/23/2018	6/25/2018	9/22/2018	12/9/2018	3/11/2019	6/7/2019	7/2/2019	11/15/2019	1 Jan 2020-30 Mar 2020	1 Apr 2020 to 30 Jun 2020	1 Jul 2020-30 Sep 2020	1 Oct 2020-31 Dec 2020	1 Jan 2021 to 31 Mar 2021											
A	Aluminum	mg/L	0.75	***0.9279***	0.06	NQE	0.344	0.18	0.101	0.0507	0.0952	0.388	0.318	***1.28***	0.078	PRM	PRM	PRM	PRM	PRM											
	Iron	mg/L	1	***1.506***	0.426	NQE	0.809	0.94	0.0906	0.108	0.107	0.555	0.458	***1.81***	0.156	PRM	PRM	PRM	PRM	PRM											
	Lead	mg/L	0.262	0.009	0.0002	NQE	0.015	0.001	0.0009	0.0012	0.00052	0.0017	0.0039	0.0095	0.0011	PRM	PRM	PRM	PRM	PRM											
B	Aluminum	mg/L	0.75	0.3656	0.0665	NQE	0.0686	0.11	0.195	0.0051	0.0684	0.064	0.51	***0.78***	0.09	PRM	PRM	PRM	PRM	PRM											
	Iron	mg/L	1	0.6996	0.356	NQE	0.0305	0.64	0.114	0.0522	0.1315	0.125	0.797	***1.58***	0.154	PRM	PRM	PRM	PRM	PRM											
	Lead	mg/L	0.262	0.004	0.0006	NQE	0.003	0.0003	0.0017	0.0003	0.00068	0.00054	0.0032	0.0066	0.00058	PRM	PRM	PRM	PRM	PRM											
	TSS	mg/L	100	18	8	NQE	10	17	8	ND	ND	4	9	18	ND	PRM	PRM	PRM	PRM	PRM											
	COD	mg/L	120	13	***162***	NQE	21	***434***	25	23	42	89	89	103	26	PRM	PRM	PRM	PRM	PRM											
C	Aluminum	mg/L	0.75	0.1486	0.0568	NQE	0.208	0.12	0.233	0.0334	0.0384	0.0628	0.228	0.24	PRM	PRM	PRM	PRM	PRM	PRM											
	Iron	mg/L	1	***1.2886***	0.485	NQE	***3.269***	0.87	0.309	0.267	0.4889	0.584	***1.11***	***1.26***	0.028	PRM	PRM	PRM	PRM	PRM											
	Lead	mg/L	0.262	0.0009	0.00008	NQE	0.002	**0.5**	0.0004	0.0002	0.0003	0.00031	0.0009	0.001	ND	PRM	PRM	PRM	PRM	PRM											

Italic: Individual sample exceeds benchmark or target value
ND: Not Detected Above Method Detection Limit
NQE: No Qualifying Event
µg/L: Microgram Per Liter
PRM = permit requirements met.

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Table 4-7: Monthly Copper and Zinc Monitoring

Outfall	A		B		C	
Analyte	**Copper**	**Zinc**	**Copper**	**Zinc**	**Copper**	**Zinc**
Units	**µg/L**	**µg/L**	**µg/L**	**µg/L**	**µg/L**	**µg/L**
Benchmark	**14**	**117**	**14**	**117**	**14**	**117**
Jan-17	22	142	9	67	4	27.4
Feb-17	NQE	NQE	NQE	NQE	NQE	NQE
Mar-17	17	68.2	9	38	4	34.4
Apr-17	NQE	NQE	NQE	NQE	NQE	NQE
May-17	NQE	NQE	NQE	NQE	NQE	NQE
Jun-17	12	32	23	112	10	28.1
Jul-17	NQE	NQE	NQE	NQE	NQE	NQE
Aug-17	NQE	NQE	NQE	NQE	NQE	NQE
Sep-17	NQE	NQE	NQE	NQE	NQE	NQE
Oct-17	56.4	180	31.2	43	28.2	39
Nov-17	NQE	NQE	NQE	NQE	NQE	NQE
Dec-17	NQE	NQE	NQE	NQE	NQE	NQE
Jan-18	13	12	9	12	7	48
Feb-18	57.7	198	30.2	63.9	30.2	78.9
Mar-18	12	6.8	12	13	4.9	17
Apr-18	4.7	22	12.6	40	14	2.9
May-18	NQE	NQE	NQE	NQE	NQE	NQE
Jun-18	25.5	79	9.1	84.1	24.8	59.9
Jul-18	NQE	NQE	NQE	NQE	NQE	NQE
Aug-18	NQE	NQE	NQE	NQE	NQE	NQE
Sep-18	25.2	69.6	3.8	38.6	9.5	53.9
Oct-18	35	78	4.1	48	15	14
Nov-18	26	103.6	15	76.1	33	12
Dec-18	21.6	76.6	7.1	45.9	12	66.3
Jan-19	12	86.1	3.8	53.8	6.2	80.5
Feb-19	20	62	NQE	NQE	6	44
Mar-19	16	52	8	49	8.5	22
Apr-19	21	78	15	57	3.5	17
May-19	40	95	14	50	8.7	41
Jun-19	26	101	19	124	9.6	29
Jul-19	42	105	28	82	14	217
Aug-19	26	78	17	73	9.8	8.8
Sep-19	40	109	24	142	33	6.8
Oct-19	18.4	38.3	5.4	47.3	17	5.6
Nov-19	29.8	54.7	5.3	54.9	14.1	7.1
Dec-19	10.8	37.5	4.2	37	4.9	11.9
Jan-20	12.2	56.2	3.6	24	2.3	10.2
Feb-20	14	66.6	4.1	17.2	4.1	31.6
Mar-20	10.4	46	3.6	39.5	1.2	8.8
Apr-20	12.7	43.1	20.4	79.8	7.9	43.8
May-20	23.5	44.4	11.8	54.5	1.9	11.4
Jun-20	14.2	26.1	11.1	33	1.4	8.9
Jul-20	NQE	NQE	NQE	NQE	NQE	NQE

Table 4-7 (continued): Monthly Copper and Zinc Monitoring

Outfall	A		B		C	
Analyte	**Copper**	**Zinc**	**Copper**	**Zinc**	**Copper**	**Zinc**
Units	**µg/L**	**µg/L**	**µg/L**	**µg/L**	**µg/L**	**µg/L**
Benchmark	**14**	**117**	**14**	**117**	**14**	**117**
Aug-20	20.8	77.4	17.3	100	1.2	3.2
Sep-20	35	140	13.2	66.3	1.2	14.7
Oct-20	20.4	66.1	10	61.9	1.4	6.8
Nov-20	43.5	160	9.88	48.9	0.99	2.54
Dec-20	27.1	83.8	5.37	29.8	0.41	2.07
Jan-21	10.8	23.3	3.8	8.39	0.91	3.26
Feb-21	28.2	92.7	9.4	50.4	3.1	4

Italic: Individual sample exceeds benchmark or target value
ND: Not Detected Above Method Detection Limit
NQE: No Qualifying Event
µg/L: Microgram Per Liter

5 Stormwater Control Measures

In accordance with the MSGP, NAVSTA Everett must select, design, install, and implement stormwater control measures, including BMPs, to prevent or reduce the potential for water pollution, meet non-numeric effluent limits, meet limits contained in applicable effluent limitations guidelines, and meet water quality based effluent limitations. Some BMPs are more appropriate for an individual site than others based on site-specific characteristics; some BMPs are readily implemented at all sites.

EPA identifies baseline BMPs (good housekeeping and preventive maintenance practices, inspections, employee training and testing, spill prevention and response, sediment and erosion control, management of runoff, and recordkeeping and reporting) that are required of all facilities and advanced BMPs that specifically address particular pollutant sources or industrial sectors. The Stormwater Management Manual for Western Washington (Ecology 2012) also identifies baseline BMPs and emphasizes source control BMPs as the first and most cost effective method of eliminating or reducing pollution of stormwater.

The various types of stormwater control measures, including BMPs, applicable to NAVSTA Everett are summarized below.

5.1 Non-Numeric Technology-Based Effluent Limits (Core BMPs)

Core BMPs are those mandated in the MSGP, which generally apply to all industrial areas at NAVSTA Everett. Core BMPs are identified in Table 5-1.

5.2 Sector-Specific Non-Numeric Effluent Limits (Sector-Specific BMPs)

The industrial areas at NAVSTA Everett are associated with one or more of three industrial sectors defined in the MSGP. Sector-specific BMPs are mandated in the MSGP and apply to industrial areas at NAVSTA Everett that have activities associated with the respective MSGP sector(s). Sector-specific BMPs are identified in Table 5-1.

5.2.1 Sector N: Scrap and Waste Recycling Facility BMPs

These BMPs are required by MSGP for Scrap and Waste Recycling Facilities (Non-Source Separated, Nonliquid Recyclable Materials). Unless otherwise noted, these BMPs apply only to those facilities associated with that sector.

5.2.2 Sector P: Land Transportation and Warehousing BMPs

These BMPs are required by MSGP for Land Transportation and Warehousing. Unless otherwise noted, these BMPs apply only to those facilities associated with that sector.

5.2.3 Sector Q: Water Transportation BMPs

These BMPs are required by MSGP for Water Transportation. Unless otherwise noted, these BMPs apply only to those facilities associated with that sector.

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Table 5-1: Stormwater Control Measures/Best Management Practices

BMP Number	BMP Title	BMP	Note
Core BMPs			
C-1	Minimize Exposure (Core BMP)	Industrial areas at NAVSTA Everett must minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff in order to minimize pollutant discharges by either locating these industrial materials and activities inside or protecting them with storm resistant coverings. Unless infeasible, you must also: • Use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away from these areas; • Locate materials, equipment, and activities so that potential leaks and spills are contained or able to be contained or diverted before discharge; • Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; • Store leaky vehicles and equipment indoors or, if stored outdoors, use drip pans and absorbents; • Use spill/overflow protection equipment; • Perform all vehicle and/or equipment cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and • Drain fluids from equipment and vehicles that will be decommissioned and for any equipment and vehicles that will remain unused for extended periods of time, inspect at least monthly for leaks. *Note: Industrial materials do not need to be enclosed or covered if stormwater runoff from affected areas does not discharge pollutants to receiving waters or if discharges are authorized under another NPDES permit.*	Minimizing exposure of pollutants to stormwater is a core BMP required under the MSGP.
C-2	Good Housekeeping (Core BMP)	Industrial areas at NAVSTA Everett must keep clean all exposed areas that are potential sources of pollutants. Good housekeeping measures must be performed in order to minimize pollutant discharges, including but not limited to, the following: • Sweep or vacuum at regular intervals, or alternatively wash down the area and collect and/or treat. Properly dispose of the washdown water. • Store materials in appropriate containers.	The MSGP requires implementation of good housekeeping practices.

BMP Number	BMP Title	BMP	Note
		• Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids and could leak, ensure that discharges have a control (e.g., secondary containment, treatment). This permit does not authorize dry weather discharges from dumpsters or roll off boxes. • Minimize the potential for waste, garbage, and floatable debris to be discharged by keeping exposed areas free of such materials or by intercepting them before they are discharged. *Plastic Materials Requirements:* Facilities that handle pre-production plastic must implement best management practices to eliminate discharges of plastic in stormwater. Examples of plastic material required to be addressed as stormwater pollutants include plastic resin pellets, powders, flakes, additives, regrind, scrap, waste, and recycling.	
C-3	Maintenance (Core BMP)	Industrial areas at NAVSTA Everett must maintain all control measures that are used to achieve the effluent limits in this permit in effective operating condition, as well as all industrial equipment and systems, in order to minimize pollutant discharges. This includes: • Perform inspections and preventive maintenance of stormwater drainage, source controls, treatment systems, and plant equipment and systems that could fail and result in contamination of stormwater • Inspect outdoor portable tanks including the valve system that are used to collect and hold industrial related effluent and that do not have a secondary containment system that could hold a full tank capacity in the event of a spill or leak. • Diligently maintain non-structural control measures (e.g., keep spill response supplies available, personnel appropriately trained) • Inspect and maintain baghouses at least quarterly to prevent the escape of dust from the system and immediately remove any accumulated dust at the base of the exterior baghouse • Clean catch basins when the depth of debris reaches two-thirds of the sump depth and keep the debris surface at least 6 inches below the lowest outlet pipe	See Section 7 of the SWPPP for more information regarding maintenance and inspections.
C-4	Spill Prevention and Response (Core BMP)	Industrial areas at NAVSTA Everett must minimize the potential for leaks, spills, and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur in order to minimize pollutant discharges. Spill prevention and response measures that must be conducted include, but are not limited to, the following:	Spill prevention and response procedures are thoroughly addressed in NAVSTA Everett Spill Prevention, Control, and Countermeasures (SPCC) Plan and Commander, Navy Region

BMP Number	BMP Title	BMP	Note
		• Plainly label containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides") that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur; • Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas or a similarly effective means designed to prevent the discharge of pollutants from these areas; • Develop training on the procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases, and as appropriate, execute such procedures as soon as possible; • Keep spill kits on-site, located near areas where spills may occur or where a rapid response can be made; and • Notify appropriate facility personnel when a leak, spill, or other release occurs. When a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, or 40 CFR Part 302, occurs during a 24-hour period, you must notify the National Response Center (NRC) at (800) 424-8802 as soon as you have knowledge of the discharge. State or local requirements may necessitate reporting spills or discharges to local emergency response, public health, or drinking water supply agencies. Contact information must be in locations that are readily accessible and available.	Northwest (COMNAVREG NW) Oil and Hazardous Substance Integrated Contingency Plan (ICP).
C-5	Erosion and Sediment Controls (Core BMP)	Industrial areas at NAVSTA Everett must minimize erosion by stabilizing exposed soils in order to minimize pollutant discharges and placing flow velocity dissipation devices at discharge locations to minimize channel and stream bank erosion and scour in the immediate vicinity of discharge points. Industrial activities must also use structural and non-structural control measures to minimize the discharge of sediment. If polymers and/or other chemical treatments are used as part of erosion and sediment controls, they must be identified by name and purpose in this SWPPP. Additional resources are available to help select appropriate BMPs for erosion and sediment control at EPA's Stormwater Discharges from Construction Activities website.	The MSGP requires that the SWPPP identify areas of the facility that have the potential for erosion and implement BMPs to control that erosion.
C-6	Management of Runoff (Core BMP)	Industrial areas at NAVSTA Everett must divert, infiltrate, reuse, contain, or otherwise reduce stormwater runoff to minimize pollutants in discharges. In selecting, designing, installing, and implementing appropriate control measures, facilities are encouraged to consult with EPA's internet-based resources relating to runoff management, including the sector-specific Industrial Stormwater Fact Sheet Series, National Menu of Stormwater	The MSGP requires that stormwater runoff management practices such as permanent structural BMPs be described in the SWPPP.

BMP Number	BMP Title	BMP	Note
		BMPs, and National Management Measures to Control Nonpoint Source Pollution from Urban Areas, and any similar state or tribal resources.	
C-7	Salt Storage Piles or Piles Containing Salt (Core BMP)	Industrial areas at NAVSTA Everett must enclose or cover storage piles of salt or piles containing salt that are used for deicing or other commercial or industrial purposes, including maintenance of paved surfaces, in order to minimize pollutant discharges. Salt storage facilities must implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile. Piles do not need to be enclosed or covered pursuant to this permit if stormwater runoff from the piles is not discharged or if discharges from the piles are authorized under another NPDES permit.	Winter Road and Sidewalk Safety (Salt and Sand): Control measures including covering piles must be described and implemented through the SWPPP.
C-8	Employee Training (Core BMP)	NAVSTA Everett must train all employees who work in areas where industrial materials or activities are exposed to stormwater or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of the stormwater pollution prevention team. The following personnel must understand the requirements of the MSGP and their specific responsibilities with respect to those requirements: • Personnel who are responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures); • Personnel responsible for the storage and handling of chemicals and materials that could become contaminants in stormwater discharges; • Personnel who are responsible for conducting and documenting monitoring and inspections as required in the MSGP and • Personnel who are responsible for taking and documenting corrective actions as required in the MSGP. Personnel must be trained in at least the following if related to the scope of their job duties (e.g., only personnel responsible for conducting inspections need to understand how to conduct inspections): • An overview of what is in the SWPPP; • Spill response procedures, good housekeeping, maintenance requirements, and material management practices; • The location of all controls on the site required by this permit, and how they are to be maintained;	Industrial sector-specific training requirements are also applicable. See sector-specific BMPs below.

BMP Number	BMP Title	BMP	Note
		• The proper procedures to follow with respect to the permit's pollution prevention requirements; and • When and how to conduct inspections, record applicable findings, and take corrective actions.	
C-9	Non-Stormwater Discharges (Core BMP)	NAVSTA Everett personnel must evaluate for the presence of non-stormwater discharges. Any non-stormwater discharges not explicitly authorized in MSGP or covered by another NPDES permit must be eliminated. This includes vehicle and equipment/tank wash water (except for those authorized in MSGP for Sectors G, H, and J). If not covered under a separate NPDES permit, then wastewater, wash water, and any other unauthorized non-stormwater must be discharged to a sanitary sewer in accordance with applicable industrial pretreatment requirements or otherwise disposed of appropriately.	Permittees must eliminate non-stormwater discharges not authorized by an NPDES permit. See SWPPP Section 4-3, for a list of authorized non-stormwater discharges.
C-10	Dust Generation and Vehicle Tracking of Industrial Materials (Core BMP)	NAVSTA Everett must minimize generation of dust and off-site tracking of raw, final, or waste materials in order to minimize pollutant discharges.	
Sector N BMPs – Scrap Recycling and Waste Recycling Facilities			
N-1	Inbound Recycling and Waste Material Control Program	Minimize the chance of accepting materials that could be significant sources of pollutants by conducting inspections of inbound recyclables and waste materials and through implementation of control measures such as the following, where determined to be feasible (list not exclusive): Provide information and education to suppliers of scrap and recyclable waste materials on draining and properly disposing of residual fluids (e.g., from vehicles and equipment engines, radiators and transmissions, oil filled transformers, and individual containers or drums) and removal of mercury switches from vehicles before delivery to the facility; establish procedures to minimize the potential of any residual fluids from coming into contact with precipitation or runoff; establish procedures for accepting scrap lead-acid batteries (additional requirements for the handling, storage, and disposal or recycling of batteries are contained in the scrap lead-acid battery program provisions in MSGP); provide training targeted for those personnel engaged in the inspection and acceptance of inbound recyclable materials; and establish procedures to ensure that liquid wastes, including used oil, are stored in materially compatible and non-leaking containers and are disposed of or recycled in accordance with the Resource Conservation and Recovery Act (RCRA).	Materials will be inspected for potential sources of spills.

BMP Number	BMP Title	BMP	Note
N-2	Scrap and Waste Material Stockpiles and Storage (Outdoor)	Minimize contact of stormwater runoff with stockpiled materials, processed materials, and non-recyclable wastes through implementation of control measures such as the following, where determined to be feasible (list not exclusive): Permanent or semi-permanent covers; sediment traps, vegetated swales and strips, catch basin filters, and sand filters to facilitate settling or filtering of pollutants; dikes, berms, containment trenches, culverts, and surface grading to divert runoff from storage areas; silt fencing; and oil and water separators, sumps, and dry absorbents for areas where potential sources of residual fluids are stockpiled (e.g., automobile engine storage areas).	Stored materials will be covered to the maximum extent practicable. Electronics will be shrink-wrapped or covered with tarps. Metals will be covered or stored in dumpsters with weatherproof lids.
N-3	Stockpiling of Turnings Exposed to Cutting Fluids (Outdoor Storage)	Minimize contact of surface runoff with residual cutting fluids by storing all turnings exposed to cutting fluids under some form of permanent or semi-permanent cover, or establish dedicated containment areas for all turnings that have been exposed to cutting fluids. Any containment areas must be constructed of concrete, asphalt, or other equivalent types of impermeable material and include a barrier (e.g., berms, curbing, elevated pads) to prevent contact with stormwater run-on. Stormwater runoff from these areas can be discharged provided that any runoff is first collected and treated by an oil and water separator or its equivalent. Regularly maintain the oil and water separator (or its equivalent) and properly dispose of or recycle collected residual fluids.	Metal turnings will be covered or otherwise protected from exposure.
N-4	Scrap and Waste Material Stockpiles and Storage (Covered or Indoor Storage)	Minimize contact of residual liquids and particulate matter from materials stored indoors or under cover with surface runoff through implementation of control measures such as the following, where determined to be feasible (list not exclusive): Good housekeeping measures, including the use of dry absorbents or wet vacuuming to contain, dispose of, or recycle residual liquids originating from recyclable containers; mercury spill kits for spills from storage of mercury switches; not allowing wash water from tipping floors or other processing areas to discharge to the storm sewer system; and disconnecting or sealing off all floor drains connected to the storm sewer system.	Materials will be stored in containers or on pallets to minimize contact with runoff.
N-5	Scrap and Recyclable Waste Processing Areas	Minimize surface runoff from coming in contact with scrap processing equipment. Pay attention to operations that generate visible amounts of particulate residue (e.g., shredding) to minimize the contact of accumulated particulate matter and residual fluids with runoff (i.e., through good housekeeping, preventive maintenance). To minimize discharges of pollutants in stormwater from scrap and recyclable waste processing areas, implement control measures such as the following, where determined to be feasible (list not exclusive): At least once per month, inspect equipment for spills or leaks and for malfunctioning, worn, or corroded parts or equipment; establish a preventive maintenance program for processing equipment; use dry-absorbents or other clean-up practices to collect and dispose of or recycle spilled or leaking fluids; use mercury spill kits for spills from storage of mercury switches; for unattended hydraulic reservoirs over 150 gallons in capacity, install protection devices such as low-level alarms or equivalent devices or install secondary containment that can hold the entire volume of the reservoir; implement	All scrap and recycling bins must be covered to prevent stormwater intrusion. Processing areas must be bermed or contained so surface runoff does not come into contact with scrap processing equipment.

BMP Number	BMP Title	BMP	Note
		containment or diversion structures such as dikes, berms, culverts, trenches, elevated concrete pads, and grading to minimize contact of stormwater runoff with outdoor processing equipment or stored materials; use oil and water separators or sumps; install permanent or semi-permanent covers in processing areas where there are residual fluids and grease; and use retention or detention ponds or basins, sediment traps, vegetated swales or strips, and/or catch basin filters or sand filters for pollutant settling and filtration.	
N-6	Scrap Lead-Acid Battery Program	To minimize the discharge of pollutants in stormwater from lead-acid batteries, properly handle, store, and dispose of scrap lead-acid batteries and implement control measures such as the following, where determined to be feasible (list not exclusive): Segregate scrap lead-acid batteries from other scrap materials; properly handle, store, and dispose of cracked or broken batteries; collect and dispose of leaking lead-acid battery fluid; minimize or eliminate (if possible) exposure of scrap lead-acid batteries to precipitation or runoff; and provide employee training for the management of scrap batteries.	All scrap lead-acid batteries disposal receptacles must be contained and not expose contents to surface runoff.
N-7	Spill Prevention and Response Procedures	In addition to the requirements of MSGP, the following procedures are applicable at Sector N areas: Install alarms and/or pump shut-off systems on outdoor equipment with hydraulic reservoirs exceeding 150 gallons in the event of a line break. Alternatively, a secondary containment system capable of holding the entire contents of the reservoir plus room for precipitation can be used. Use a mercury spill kit for any release of mercury from switches, anti-lock brake systems, and switch storage areas.	N/A – There are no outdoor systems with more than 150 gallons capacity at the recycle facility.
N-8	Supplier Notification Program	As appropriate, notify major suppliers about what scrap materials will not be accepted at the facility or will only be accepted under certain conditions.	The recycle facility provides guidance to served Navy commands on acceptable materials.
Sector P BMPs – Land Transportation and Warehousing			
P-1	Good Housekeeping Measures	*Vehicle and Equipment Storage Areas*: (See BMP P-1(a)) *Fueling Areas:* (See BMP P-1(b)) *Material Storage Areas:* (See BMP P-1(c)) *Vehicle and Equipment Cleaning Areas:* See BMP(d)) *Vehicle and Equipment Maintenance Areas:* (See BMP P-1(e)) *Locomotive Sanding (Loading Sand for Traction) Areas:* (See BMP P-1(f))	Required in addition to the Core BMP C-2 procedures derived from MSGP See BMPs P-1(a) through P-1(f)

BMP Number	BMP Title	BMP	Note
P-1(a)	Vehicle and Equipment Storage Areas	Minimize the potential for stormwater exposure to leaky or leak-prone vehicles/equipment awaiting maintenance through implementation of control measures such as the following, where determined to be feasible (list not exclusive): Use drip pans under vehicles/equipment; store vehicles and equipment indoors; install berms or dikes; use absorbents; roof or cover storage areas; and clean pavement surfaces to remove oil and grease.	
P-1(b)	Fueling Areas	Minimize contamination of stormwater runoff from fueling areas through implementation of control measures such as the following, where determined to be feasible: Cover the fueling area; use spill/overflow protection and clean-up equipment; minimize stormwater run-on/runoff to the fueling area; use dry clean-up methods; and treat and/or recycle collected stormwater runoff.	
P-1(c)	Material Storage Areas	Maintain all material storage vessels (e.g., 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"). To minimize discharges of pollutants in stormwater from material storage areas, implement control measures such as the following, where determined to be feasible (list not exclusive): Store the materials indoors; Install berms/dikes around the areas; minimize runoff of stormwater to the areas; use dry clean-up methods; and treat and/or recycle collected stormwater runoff.	
P-1(d)	Vehicle and Equipment Cleaning Areas	Minimize contamination of stormwater runoff from all areas used for vehicle/equipment cleaning through implementation of control measures such as the following, where determined to be feasible (list not exclusive): Perform all cleaning operations indoors; cover the cleaning operation and ensure all wash water drains to a proper collection system (i.e., not the stormwater drainage system); treat and/or recycle collected wash water; or other equivalent measures. Discharges of vehicle and equipment wash water, including tank cleaning operations, are not authorized by the MSGP for this sector.	Washing of vehicles is allowed only at the wash racks. Yellow gear washing is allowed only at the wash racks.
P-1(e)	Vehicle and Equipment Maintenance Areas	Minimize contamination of stormwater runoff from all areas used for vehicle/equipment maintenance through implementation of control measures such as the following, where determined to be feasible (list not exclusive): Perform maintenance activities indoors; Use drip pans; keep an organized inventory of materials used in the shop; drain all parts of fluid prior to disposal; prohibit wet clean-up practices if these practices would result in the discharge of pollutants to stormwater drainage systems; use dry clean-up methods; treat and/or recycle collected stormwater runoff; and minimize run-on/runoff of stormwater to maintenance areas.	

BMP Number	BMP Title	BMP	Note
P-1(f)	Locomotive Sanding (Loading Sand for Traction) Areas	Minimize discharges of pollutants in stormwater from locomotive sanding areas through implementation of control measures such as the following, where determined to be feasible (list not exclusive): Cover sanding areas; minimize stormwater run-on/runoff; or perform appropriate sediment removal practices to minimize the off-site transport of sanding material by stormwater.	This process is not conducted at NAVSTA Everett.
P-2	Employee Training	In addition to the requirements of MSGP, the following procedures are applicable at Sector P areas. Train personnel at least once a year and address the following activities, as applicable: Used oil and spent solvent management; fueling procedures; general good housekeeping practices; proper painting procedures; and used battery management.	Required in addition to the Core BMP C-8 procedures derived from MSGP.
Sector Q BMPs – Water Transportation			
Q-1	Good Housekeeping Measures	*Pressure Washing Area*: (see BMP Q-1(a)) *Blasting and Painting Area:* (see BMP Q-1(b)) *Material Storage Areas:* (see BMP Q-1(c)) *Engine Maintenance and Repair Areas:* (see BMP Q-1(d)) *Material Handling Area:* (see BMP Q-1(e)) *Drydock Activities:* (see BMP Q-1(f))	Required in addition to the Core BMP C-2 procedures derived from MSGP. See BMPs Q-1(a) through (f). There are no drydocks at NAVSTA Everett.
Q-1(a)	Pressure Washing Area	If pressure washing is used to remove marine growth from vessels, the discharge water must be permitted by a separate NPDES permit. Collect or contain the discharges from the pressure washing area so that they are not commingled with stormwater discharges authorized by this permit.	Pressure washing to remove marine growth from vessels is allowed only at the car wash/wash racks.
Q-1(b)	Blasting and Painting Area	Minimize the potential for spent abrasives, paint chips, and overspray to be discharged into receiving waters or the storm sewer system. Contain all blasting and painting activities or use other measures to minimize the discharge of contaminants (e.g., hanging plastic barriers or tarpaulins during blasting or painting operations to contain debris). At least once per month, you must clean stormwater conveyances of deposits of abrasive blasting debris and paint chips.	Exterior vessel blasting is only allowed when operations are contained and exhaust is filtered. Over-water vessel touch-up painting is only allowed when operations are contained.

BMP Number	BMP Title	BMP	Note
Q-1(c)	Materials Storage Areas	Store and clearly label all containerized materials (e.g., fuels, paints, solvents, waste oil, antifreeze, batteries) in a protected and secure location away from drains. Minimize the contamination of precipitation or surface runoff from the storage areas. Specify which materials are stored indoors, and contain or enclose or use other measures for those stored outdoors. If abrasive blasting is performed, discuss the storage and disposal of spent abrasive materials generated at the facility. Implement an inventory control plan to limit the presence of potentially hazardous materials on-site.	Store containerized materials, with a potential to spill (e.g., paints, fuels, waste oil, antifreeze, batteries, solvents) in a protected and secure location away from drains.
Q1(d)	Engine Maintenance and Repair Areas	Minimize the contamination of precipitation or surface runoff from all areas used for engine maintenance and repair through implementation of control measures such as the following, where determined to be feasible (list not exclusive): Perform all maintenance activities indoors; maintain an organized inventory of materials used in the shop; drain all parts of fluid prior to disposal; prohibit the practice of hosing down the shop floor; use dry clean-up methods; and treat and/or recycle stormwater runoff collected from the maintenance area.	Conduct small marine engine maintenance and repairs indoors. Engine flushing using potable water is allowed only at the wash racks.
Q-1(e)	Material Handling Area	Minimize the contamination of precipitation or surface runoff from material handling operations and areas (e.g., fueling, paint and solvent mixing, disposal of process wastewater streams from vessels) through implementation of control measures such as the following, where determined to be feasible (list not exclusive): Cover fueling areas; Use spill and overflow protection; mix paints and solvents in a designated area (preferably indoors or under a shed); and minimize runoff of stormwater to material handling areas.	All material handling must take place indoors or in areas where precipitation or surface runoff can be contained.
Q-1(f)	Drydock Activities	Routinely maintain and clean drydock to minimize discharges of pollutants in stormwater. Address cleaning of accessible areas of drydock prior to flooding and at final cleanup following removal of the vessel and raising the dock. Include procedures for cleaning up oil, grease, and fuel spills occurring on drydock. To minimize discharges of pollutants in stormwater from drydock activities, implement control measures such as the following, where determined to be feasible (list not exclusive): Sweep rather than hose off debris and spent blasting material from accessible areas of drydock prior to flooding, and make absorbent materials and oil containment booms readily available to clean up or contain any spills.	N/A – There are no drydocks at NAVSTA Everett.
Q-2	Employee Training	In addition to the requirements of MSGP, the following procedures are applicable at Sector Q areas. As part of the employee training program, address, at a minimum, the following activities (as applicable): Used oil management, spent solvent management, disposal of spent abrasives, disposal of vessel wastewaters, spill prevention and control, fueling procedures, general good housekeeping practices, painting and blasting procedures, and used battery management.	Required in addition to the Core BMP C-8 procedures derived from MSGP.

BMP Number	BMP Title	BMP	Note
Q-3	Preventive Maintenance	In addition to the requirements of MSGP, the following procedures are applicable at Sector Q areas. As part of the preventive maintenance program, perform timely inspection and maintenance of stormwater management devices (e.g., cleaning oil and water separators and cleaning sediment traps to ensure that spent abrasives, paint chips, and solids are 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.	Required in addition to the Core BMP C-3 procedures derived from MSGP.
Non-Stormwater BMPs			
Non-SW-1	Fire Hydrant Flushing	Remove trash/litter prior to flushing. Do not flush in areas where spills occurred unless all spilled material removed. Fire hydrant flushing is conducted during monthly preventative maintenance schedules throughout NAVSTA Everett.	
Non-SW-2	Routine External Building Wash Downs	Buildings are occasionally washed (using either a pressure washer or hose) to remove dirt, debris, and mildew/mold. Examine building prior to washing checking for: • Staining not from a known source. For example, staining under a vent should be investigated prior to washing. • Chipping/peeling paint that would release into wash water. • Asbestos siding. Do not use detergents or disinfectants in the washing process.	
Non-SW-3	Pavement Wash Waters	Wharfs are rinsed occasionally using potable water to remove bird waste, accumulated shells left by gulls, and dirt. Other pavements (roads, parking lots) are not typically washed. Remove trash/litter prior to washing. Do not use detergents. Do not wash areas where spills occurred unless all spilled material removed.	
Non-SW-4	Landscape Watering	Landscape watering occurs throughout NAVSTA Everett. Pesticides, herbicides, and fertilizers are applied in accordance with manufacturer's instructions.	
Non-SW-5	Building Foundation Drains	Inspect all visible foundation drains for potential sources of stormwater contamination. This is done base-wide.	Base-wide

BMP Number	BMP Title	BMP	Note
Non-SW-6	Containment Boom Pressure Washing	This BMP applies to removal of sea growth from oil containment booms staged on this facility. The following restrictions apply: • Only use potable water in the pressure washer. • Do not use detergents, soaps, disinfectants, or solvents. • Booms 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 washing process. Stop the process if discoloration observed. • Contact the Environmental office if discoloration observed.	
Non-SW-7	Boat Rinsing to Remove Saltwater	Examine boat exterior prior to washing and check for: • Staining not from a known source • Chipping/peeling paint that would release into wash water Rinse using only potable water. Do not use detergents or disinfectants in washing process.	Boats are occasionally rinsed using a hose to remove salt water.
Facility-Specific BMPs			
F-1	PSNS & IMF Annex/South Wharf Drainage Trench	A portion of the storm sewer trench runs directly though the PSNS & IMF Annex facilities. Prevent the entry of contaminants into the trench by placing rubber-backed plywood over the trench. Ensure the area around the trench is kept clear of materials or debris that has potential of entering the trench.	
F-2	21st Street Overpass Spill Response	Overpass catch basins are susceptible to receive pollution. To reduce the potential for pollution of stormwater runoff at the 21st Street overpass and surrounding area, establish spill response procedures calling for the catch basins to be sealed off in the event of a spill or accident on the overpass. City of Everett Fire Department Hazardous Material Team Chief has been contacted concerning this issue. The City of Everett Fire Department has current Standard Operating Procedures that include sealing catch basins on the overpass in the event of a spill or accident on the overpass.	

5.3 Non-Stormwater and Facility-Specific BMPs

Non-stormwater discharge BMPs are associated with buildings or processes that allow non-stormwater discharges. Facility-specific BMPs are associated with a specific area, facility, or process. Facility-specific BMPs are developed at locations that have a higher risk of releases to stormwater. Non-stormwater and facility-specific BMPs are identified in Table 5-1.

5.4 Numeric Effluent Limitations Based on Effluent Limitations Guidelines

The MSGP provides coverage for stormwater discharges from several types of facilities that are subject to numeric effluent limitations. MSGP identifies the industrial sectors subject to applicable effluent limitations guidelines. NAVSTA Everett does not conduct industrial activities or processes associated with the covered sectors. Therefore, this type of monitoring is not required at NAVSTA Everett.

5.5 Water Quality Based Effluent Limitations and Water Quality Standards

Discharges from NAVSTA Everett must be controlled as necessary to meet applicable water quality standards. If it is determined that a discharge from the facility does not meet applicable water quality standards, the Navy must take corrective action(s) and document them as required in Section 9 of this SWPPP.

The EPA considers a facility as a discharger to impaired waters if the first water of the U.S. receiving the discharge is identified by a state, tribe, or the EPA as not meeting an applicable water quality standard, and:

- Requires development of a TMDL (pursuant to Section 303(d) of the CWA);
- Is addressed by an EPA approved or established TMDL; or
- Is not in either of the above categories, but the waterbody is covered by a pollution control program that meets the requirements of 40 CFR 130.7(b)(1).

For discharges that enter a municipal or non-municipal separate storm sewer system prior to discharge, the first water of the U.S. to which the facility discharges is the waterbody that receives the water from the storm sewer system.

The 2012 Washington State Water Quality Assessment listed Port Gardner and Inner Everett Harbor as a Category 5 Impaired Water for Sediment Bioassay. The Snohomish River as a Category 5 Impaired Water for Sediment Fluoranthene and Sediment Bioassay. These sections of impaired water are located adjacent to NAVSTA Everett. The four (4) outfalls of NAVSTA Everett only discharge to the mouth of the Snohomish River. Currently, there are no TMDLs established for the NAVSTA Everett receiving waters.

Table 5-2 summarizes the assessment for the waters bordering NAVSTA Everett.

Table 5-2: Categories of Adjacent Waters

Waterbody ID	Name	Medium	Category	Parameter	Listing ID
1224819475188	Port Gardner and Inner Everett Harbor	Sediment	5	Sediment Bioassay	504342, 504390, 504391
			2	Benzoic Acid	620122
			1	Anthracene	620093
				Arsenic	620094
				Benzo(a)pyrene	620095
				Bis(2-Ethylhexyl)phthalate	620096
				Cadmium	620097
				Chromium	620098
				Chrysene	620099
				Copper	620100
				Dibenzo(a,h)anthracene	620101
				Fluoranthene	620102
				Fluorene	620103
				Indeno(1,2,3-c,d)pyrene	620104
				Lead	620105
				Mercury	620106
				High Molecular Weight Polycyclic Aromatic Hydrocarbons (PAH)	620107
				Polychlorinated Biphenyls (PCB)	620108
				Phenol	620110
				Pyrene	620111
				Silver	620112
				Zinc	620113
				Benzo(a)anthracene	620114
				Low Molecular Weight PAHs	620115
				2-Methylnaphthalene	620116
				4-Methylphenol	620117
				Acenaphthene	620118
				Acenaphthylene	620119
				Benzo(g,h,i)perylene	620120
				Benzofluoranthenes, Total (b+k+j)	620121
				Dibenzofuran	620124
				Naphthalene	620125
				Phenanthrene	620126
		Water	2	Dissolved Oxygen	10151
				Bacteria	15705
			1	Ammonia-N	10150
				Temperature	10153
	Snohomish River	Sediment	5	Fluoranthene	614094
				Sediment Bioassay	619429
			2	Sediment Bioassay	616932
		Tissue	5	2,3,7,8-TCDD	64445
			1	Mercury	64446

Table 5-3 summarizes the Water Quality Categories, as provided at the Washington State Department of Ecology (WDOE) website at:

https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-improvement/Assessment-of-state-waters-303d

Table 5-3: Water Quality Assessment Categories

Category	Summary	Description
1	Meets tested standards for clean waters	Placement in this category does not necessarily mean the 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 tested pollutants. Specific information about the monitoring results may be found in the individual listings.
2	Waters of concern	Waters where there is some evidence of a water quality problem, but not enough to require production of a Water Quality Improvement (WQI), including TMDL, at this time.
3	Insufficient data	Water where there is insufficient data to meet minimum requirements according to WDOE's Policy 1-11 "Assessment of Water Quality for the Clean Water Act Section 303(d) and 305(b) Integrated Report."
4	Polluted waters that do not require a TMDL	Waters that have pollution problems that are being solved in one of three ways: • **Category 4A** – Water bodies that have an approved TMDL in place and is actively being implemented. • **Category 4B** – Water bodies that have a pollution control 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 elements, and there must be some legal or financial guarantee that they will be implemented. • **Category 4C** – 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.
5	Polluted waters that require a TMDL or other WQI project	Water bodies on the list of impaired water bodies traditionally known as the **303(d) list**. Starting with the 2008 Water Quality Assessment, Washington's 303(d) list of polluted waters were placed under Category 5 in the approved assessment.

These categories are depicted in Figure 5-1 on the following page and identifies the water bodies near NAVSTA Everett that are currently included as impaired on the 303(d) list

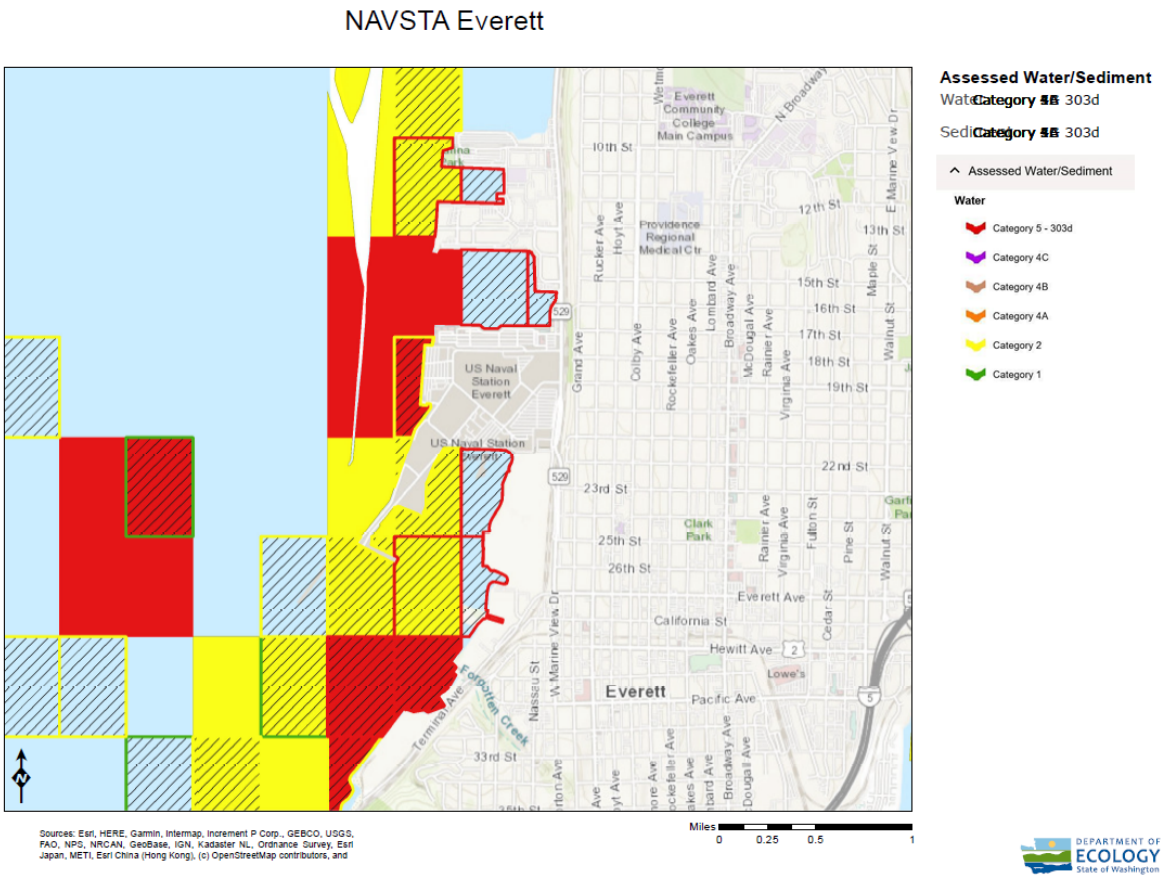

Figure 5-1: Impaired Water Bodies

6 MONITORING

6.1 Analytical Monitoring Requirements

NAVSTA Everett must collect and analyze stormwater samples and document monitoring activities consistent with the procedures described in the MSGP; and any sector specific or State/Tribal specific requirements.

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 MSGP.

All required analytical monitoring must be conducted in accordance with the procedures described in the MSGP. See Table 6-1 for a summary of the quarterly and biannual analytical monitoring requirements.

Table 6-1: Monitoring Requirements

Analyte	Outfall A	Outfall B	Outfall C	Outfall D
Total Recoverable Aluminum (Sector N, Q)	Quarterly	Quarterly	Quarterly	NA
Total Recoverable Copper(Sector N)	NA	Quarterly	NA	NA
Total Recoverable Lead (Sector N, Q)	Quarterly	Quarterly	Quarterly	NA
Total Recoverable Zinc (Sector N, Q)	Quarterly	Quarterly	Quarterly	NA
TSS (Sector N, P)	NA	Quarterly	Quarterly	Quarterly
COD (Sector N, P)	NA	Quarterly	Quarterly	Quarterly
pH (Sector N, P)	NA	Quarterly	Quarterly	Quarterly
PAHs (Sector N, P, Q)	Biannually	Biannually	Biannually	Biannually

6.1.1 Required Outfall Monitoring Locations

Outfall sampling is based on the presence of industrial facilities located within an outfall's drainage area.

NAVSTA Everett has industrial facilities that fall into MSGP sectors N, P, and Q. The outfalls that must be monitored and the frequency of monitoring depend on which sectors contribute to the outfall. Sampling is required only at outfalls that have stormwater draining from sectors N, P, or Q buildings/locations.

Outfalls requiring monitoring are identified in Table 6-2. Table 6-2 also lists the building/location and MSGP sectors associated with each outfall.

Each outfall is preceded by an oil water separator. NAVSTA Everett has elected to conduct all sampling on the inlet side of the oil water separator using an autosampler at Outfalls A, B, and C which ensures conductivity below 10 uS Sampling on the inlet side of the OWS will prevent saltwater intrusion and reduce potential analytical interference. However, the samples may potentially have higher pollutant concentrations since stormwater has a greater settling time.

SWPPP Sections 6.1.2 through 6.1.5 describe the requirements for each type of monitoring.

Table 6-2: Industrial Facilities Associated with Outfalls and Permit Sector Requirements

Outfall	Grid No.	Industrial Facilities	MSGP Sectors	Sampling Required
Outfall A	D5	[redacted]	Q	Yes
Outfall B	G5	[redacted]	N; P; Q	Yes
Outfall C	I6	[redacted]	P; Q	Yes
Outfall D	K7	[redacted]	P	Yes

1 All outfall locations are shown on the SWPPP Base Map, Appendix A, Figure A-1.

6.1.2 Benchmark Monitoring

The MSGP gives the requirements for benchmark monitoring. NAVSTA Everett is required to monitor for any benchmark parameters specified in the applicable industrial sector(s).

Benchmark monitoring of stormwater discharges is required quarterly in the first and fourth year of the permit coverage. If the annual average for a parameter does not exceed the benchmark threshold, NAVSTA Everett may discontinue benchmark monitoring for that parameter for the next two years (i.e., eight quarters).

Table 6-3 lists the outfalls at which benchmark monitoring must be conducted.

Table 6-3: Quarterly Benchmark Monitoring Locations

Outfall or Catch Basin #	Sector Association	Collection Point Descriptiona
Outfall A	Q	Manhole with cover. Take the sample on the inlet side of the OWS in the center of the manhole about 2 to 4 inches below the water surface.
Outfall B	N, P, and Q	Manhole with cover. Take the sample on the inlet side of the OWS in the center of the manhole about 2 to 4 inches below the water surface.
Outfall C	Q and P	Manhole with cover. Take the sample on the inlet side of the OWS in the center of the manhole about 2 to 4 inches below the water surface.
Outfall D	P	Manhole with cover. Take the sample on the inlet side of the OWS in the center of the manhole about 6 inches below the water surface.
a Shown on the Base Map in Appendix A, Figure A-1.		

6.1.3 Effluent Limitations Guidelines Monitoring

The MSGP states in Part 4.2.3 requirements for monitoring based on effluent guidelines. Effluent guideline monitoring is required for processes listed in MSGP. Since none of the processes listed in MSGP are conducted at NAVSTA Everett, this type of monitoring is not required at NAVSTA Everett.

6.1.4 State or Tribal Specific Monitoring

The MSGP allows 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. NAVSTA Everett has conducted additional monthly analytical monitoring required by National Marine Fisheries.

6.1.5 Impaired Water Monitoring

NAVSTA Everett is an Existing Discharger to an Impaired Water without an EPA-Approved or Established TMDL for the following parameters associated with stormwater discharges to the Sonohomish River:

- Category 5 – 303(d) for Water: 2,3,7,8-TCDD (Dioxin)
- Category 5 – 303(d) for Sediment: Flouranthene
- Category 5 – 303(d) for Sediment: Sediment Bioassay

Monitoring is required annually in the first year of permit coverage and again in the fourth year of permit coverage as follows, unless you detect a pollutant causing an impairment, in which case annual monitoring must continue.

If monitoring results indicate the monitored pollutant is not detected in your discharge, or is within the acceptable range for a given parameter for the waterbody to meet its designated use (e.g., pH or temperature), you may discontinue monitoring for that pollutant for the next two years. You must resume monitoring for that pollutant in year four of permit coverage,

If monitoring results indicate that the monitored pollutant is detected in your stormwater discharge, or is outside the acceptable range for a given parameter (e.g., pH or temperature) for the waterbody to meet its designated use, you must continue to monitor for the pollutant(s) annually until no longer detected, after which you may discontinue monitoring for that pollutant until monitoring resumes in year four of permit coverage.

6.2 Summary of Analytical Monitoring

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.

Summaries of historical stormwater sampling and analysis conducted at NAVSTA Everett over the course of the previous permit term are located in Appendix H . This sampling and analysis was done per the MSGP 2015.

6.3 Sampling and Analysis Procedures

Procedures for documenting deviations from the required monitoring are included in Appendix H.

6.4 Inspections and Assessments

The following subsections identify inspection and assessment requirements in accordance with the MSGP.

6.4.1 Routine Facility Inspections

MSGP requires NAVSTA Everett to conduct periodic routine facility inspections at least quarterly or in some instances more frequently. The inspections must include areas on base covered by the MSGP requirements, including the following:

- Areas where industrial materials or activities are exposed to stormwater,
- Areas identified in the SWPPP and those that are potential pollutant sources,
- Areas where spills and leaks have occurred in the past 3 years,
- Discharge points/outfalls, and
- Control measures used to comply with the effluent limits contained in the MSGP.
- PSNS conducts weekly inspections of the piers/warf when PSNS is in an avail.

At least one member of the stormwater pollution prevention team must participate in the facility inspections. Inspections must be conducted during normal facility operating hours. At least once per year, the inspection must be completed while stormwater is discharging.

Inspection findings must be tracked and follow-up actions must be conducted. The corrective measures implemented as a result of the inspections and the measures previously in place to reduce pollutant loadings shall be evaluated to determine whether they are adequate and properly implemented in accordance with the terms of the MSGP. Any need for additional measures must be identified.

Note that certain facilities are classified under multiple industrial sectors and must meet the requirements for each applicable sector. An example form that may be used to document routine facility inspections is included in Appendix F. Completed facility inspection forms must be included in Appendix F or stored in a location that is referenced in the appendix.

Table 6-4: Industrial Sectors and Associated Facility Inspection Requirements

Industrial Sector	Inspection Schedule	Inspection Requirements
Sector N – Scrap and Waste Recycling Facility	Quarterly	Inspect inbound recyclable, waste storage, and stockpile areas (outdoor, covered, and/or indoors); waste processing areas; and lead-acid battery storage areas. Check for liquids stored without secondary containment or significant materials exposed to stormwater. Inspect for application of Core BMPs, Sector N BMPs, non-stormwater BMPs, and facility-specific BMPs provided in SWPPP Section 5.1, 5.2.1, and 5.3, respectively.
Sector P – Land Transportation and Warehousing	Quarterly	Inspect storage areas for vehicles/equipment awaiting maintenance, fueling areas, indoor and outdoor vehicle/equipment maintenance areas, material storage areas, vehicle/equipment cleaning areas, and loading/unloading areas. Inspect for application of Core BMPs, Sector P BMPs, non-stormwater BMPs, and facility-specific BMPs provided in SWPPP Section 5.1 and 5.2.2, and 5.3, respectively.
Sector Q – Water Transportation	Quarterly	Inspect pressure washing areas; blasting, sanding, and painting areas; material storage areas; engine maintenance and repair areas; material handling areas; drydock areas; and general yard areas. Inspect for application of Core BMPs, Sector Q BMPs, non-stormwater BMPs, and facility-specific BMPs provided in SWPPP Section 5.1, 5.2.3, and 5.3, respectively.

Due to past storage of metals, treated wood, and trash during Ship maintanenance availabilities on Pier A and B, PSNS&IMF Det Everett is required to conduct weekly inspections [redacted] avalilabilities and provide a written form back to the environmental office.

6.4.2 Quarterly Visual Assessment of Stormwater Discharges

The MSGP requires quarterly visual assessment of stormwater discharges at outfalls associated with industrial activity. Quarterly periods for the visual assessments are defined as January through March, April through June, July through September, and October through December. Visual assessment is required at Outfall A, B, C, and D.

Quarterly visual observations must be conducted through collection of grab samples within the first 30 minutes (or as soon as practical thereafter) of when runoff begins to discharge. The storm event should be large enough to produce measurable flow and occur at a minimum of 72 hours from the previously measurable storm event. The assessment should be conducted in a well-lit area using a clean, clear container. The grab sample must be evaluated for color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, or other obvious indicators of stormwater pollution.

Documentation of the visual examinations must include the examination date and time, examination personnel, visual quality of the stormwater discharge, and probable sources of any observed stormwater contamination. The documentation must also include an explanation of why a sample could not be collected within the first 30 minutes of discharge, if applicable. Reports must be maintained with the SWPPP. An example form for documenting quarterly stormwater discharge visual assessments is in Appendix G. Completed facility inspection

reports must also be included in Appendix G, or stored in a location that is referenced within the appendix.

The inspections are maintained on the share drive at the following:

W:\Region_Env\Everett\Stormwater\MSGP\Quarterly Facility Inspection

W:\Region_Env\Everett\Stormwater\MSGP\Quarterly Visual Outfall Inspection

When adverse weather conditions prevent the collection of samples during the quarter, a substitute sample must be taken during the next qualifying storm event. Documentation of the rationale for not conducting the scheduled visual assessment for the quarter must be included in Appendix G. Adverse conditions are those that are dangerous or create inaccessibility for personnel, such as local flooding, high winds, electrical storms, extended frozen conditions, or situations that otherwise make sampling impractical.

6.4.3 Exception for Inactive and Unstaffed Sites

The requirement to conduct facility inspections on a routine basis does not apply at an inactive and unstaffed facility. This exception does not currently apply at NAVSTA Everett.

7 Control Measures, Training, and Reporting

Prior sections of this SWPPP identify the potential pollutant sources at NAVSTA Everett's industrial areas and the stormwater control measures implemented to minimize the potential for water pollution from these areas in accordance with the MSGP. The following subsections describe the schedules and procedures established by NAVSTA Everett to comply with the relevant requirements of the MSGP. Table 7-1 provides the Control Measure Frequency Schedule for NAVSTA Everett.

Table 7-1: Control Measure Frequency Schedule

Control Measure	Frequency Schedule					
	NA	Daily	Weekly	Monthly	Quarterly	Annually
Good Housekeeping						
Sweep or vacuum at regular intervals						
Wash down the area and collect and/or treat, and properly dispose of the wash down water						
Check storage materials in appropriate containers						
Check all dumpster lids closed when not in use						
Check to minimize the potential for waste, garbage and floatable debris to be discharged by keeping exposed areas free of such materials						
Check the control measures for pre-production plastic that eliminate discharges of plastic in stormwater						
Maintenance						
Performing inspections and preventive maintenance of stormwater drainage, source controls, treatment systems, and plant equipment and systems that could fail and result in discharges of pollutants via stormwater.						
Maintaining non-structural control measures						
Inspecting and maintaining baghouses at least quarterly to prevent the escape of dust from the system and immediately removing any accumulated dust at the base of the exterior baghouse						

Control Measure	Frequency Schedule					
	NA	Daily	Weekly	Monthly	Quarterly	Annually
Cleaning catch basins when the depth of debris reaches two-thirds (2/3) of the sump depth, or in line with manufacturer specifications, whichever is lower, and keeping the debris surface at least six inches below the lowest outlet pipe.						
Spill Prevention and Response						
Check to clean up spills and leaks promptly using dry methods to prevent the discharge of pollutants						
Check the use drip pans and absorbents if leaky vehicles and/or equipment are stored outdoors						
Spill Prevention and Response						
Check the use spill/overflow protection equipment						
Check the plainly label containers that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur						
Check the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas						
Develop training on the procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases.						
Check spill kits onsite, located near areas where spills may occur or where a rapid response can be made						
Notify appropriate facility personnel when a leak, spill, or other release occurs						
Erosion and Sediment Control						
Check for stabilizing exposed soils at your facility and placing flow velocity dissipation devices at discharge locations to minimize channel and						

Control Measure	Frequency Schedule					
	NA	Daily	Weekly	Monthly	Quarterly	Annually
streambank erosion and scour in the immediate vicinity of discharge points.						
Check structural and non-structural control measures to minimize the discharge of sediment.						
Management of Stormwater						
Check control measures that divert, infiltrate, reuse, contain, or otherwise reduce stormwater to minimize pollutants in your discharges						
Salt Storage Piles						
Check the enclosed or covered storage piles of salt, or piles containing salt, used for deicing or other commercial or industrial purposes, including maintenance of paved surfaces, in order to minimize pollutant discharges.						
Employee Training						
Frequency/schedule of training for employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of the MSGP						
Routine Facility Inspections						
Routine facility inspections						
Visual assessment of stormwater discharges						
Monitoring						
Benchmark monitoring						
Effluent limitations guidelines monitoring						
State- or tribal-specific monitoring						
Impaired waters monitoring						
Other monitoring as required by EPA						

7.1 Good Housekeeping

Prior to June 2016, surface sweeping was conducted on an as-needed basis. Much of the surface sweeping occurred at the piers in the Outfall A drainage area, prior to ship arrivals or special events and predominantly for aesthetic purposes. More frequent surface sweeping for water quality purposes began in early June 2016, with the intent of removing accumulated pollutants and sediments at the facility. Routine sweeping of impervious surfaces is conducted by public works personnel. Frequency of sweeping varies by location and industrial usage. Generally, street and surface sweeping of drainage areas serving Outfall A and B is conducted biweekly, while the drainage areas serving Outfall C and D are swept bimonthly. NAVSTA Everett uses a 2010 Elgin Pelican broom sweeper and a smaller Tennet sweeper for areas with difficult access such as laydown areas, loading docks, walkways, and alongside buildings. Locations requiring sweeping are also evaluated during routine facility inspections and recorded for corrective action (see SWPPP Section 9).

Routine garbage disposal services are conducted primarily by a contractor. Refuse dumpsters and roll off containers are kept closed when not in use. Those without lids or with non-functioning lids are evaluated during routine inspections and recorded for corrective action if a potential impact to stormwater discharges is observed.

7.2 Maintenance

Catch basin inspection and coordination of cleaning is conducted primarily by the NAVFAC Environmental Stormwater Manager. Frequency of cleaning varies by location and need. Base-wide catch basin cleaning occurred in 2002 and 2010. The cleaning covers the piping, manholes and oil/water separators. Locations requiring cleaning are also evaluated during routine facility inspections and recorded for corrective action (see SWPPP Section 9) if a need for cleaning is identified.

Oil/water separator inspection and maintenance is conducted primarily by a contractor. Inspections, cleaning, maintenance, and repairs are conducted annually at each of the oil interceptors servicing Outfall A, B, C, and D. The oil interceptors are also evaluated during routine facility inspections and recorded for corrective action (see SWPPP Section 9) if a deficiency or need for additional action is identified.

Further information regarding maintenance activities for major stormwater management control measures and equipment is available in Appendix E.

7.3 Spill Prevention and Response Procedures

Spill prevention procedures are delineated in the NAVSTA Everett SPCC plan. The SPCC plan describes the design and construction requirements for aboveground tanks and containers [redacted]. The plan details the piping, valves, appurtenances and leak detection equipment. The SPCC plan additionally describes tank and container inspection and testing requirements.

Secondary containment at fuel facilities, tanks and drum storage and handling areas are checked daily or after every rainfall event for the presence of stormwater. If stormwater has accumulated in the secondary containment, the water is inspected for the presence of oil prior to draining. If oil is present, the oily water must be removed and properly disposed.. Fuel storage facilities are

additionally inspected on a monthly and annual basis. The monthly and yearly inspections are recorded on checklists, which are retained for at least 3 years following the inspections. Required testing occurs in accordance with manufacturer's specifications.

Spill response procedures are described in COMNAVREG NW ICP. Annex E of the ICP provides installation specific spill contingency guidance for NAVSTA Everett. When spills occur or are discovered, they are reported immediately to the COMNAVREG NW Fire and Emergency Services/Regional Dispatch Center at (425) 304-3333, or at 911 from an on-base telephone. Every effort should be made to stop the source and contain the spill if personnel on-site are properly trained and authorized and it is safe to do so. The Public Works Environmental Office will determine if a spill is reportable to appropriate federal, state, and local agencies.

7.4 Erosion and Sediment Control

Industrial facilities at NAVSTA Everett are evaluated for erosion and sedimentation issues on a quarterly basis during routine facility inspections. Findings are recorded and addressed through the corrective action process, in accordance with SWPPP Section 9.

Stormwater discharges from construction activities can have a significant impact on water quality. Construction activities at NAVSTA Everett that disturb at least one acre of land or smaller sites that are part of a larger common plan of development are generally managed under the EPA's CGP process (see SWPPP Section 1.4.2). Conformance to the CGP requires completion of a construction site-specific SWPPP that includes the selection and implementation of temporary and/or permanent erosion and sediment controls throughout the construction project.

A number of sources are available that describe BMPs for erosion and sediment control on construction sites. Much of this information has been complied and modified to reflect local (Puget Sound) conditions in WDOE's Stormwater Management Manual for Western Washington.

7.5 Employee Training

In accordance with the MSGP, NAVSTA Everett personnel must be trained as necessary to meet the requirements described in SWPPP Section 4 and the sector-specific requirements described in Section 4.2. Tenant Commands at NAVSTA Everett designate individuals as Environmental Work Center Coordinators (EWCC) to serve as liaison between the Command and the Environmental Department. The EWCC receives initial stormwater training when assigned as an EWCC and refresher training annually thereafter. The EWCC is responsible for providing on-the-job training to work center personnel whose jobs impact the environment. This training is documented and maintained with the EMS program manager.

Example training logs are provided in Appendix D. As EWCC training is conducted, copies of completed training records should be included in Appendix D or stored in a location that is referenced in the appendix.

7.6 Quarterly/ Biannual Benchmark Monitoring Reporting

Monitoring data must be reported using EPA's electronic NetDMR tool at www.epa.gov/netdmr, as described in the MSGP (unless a waiver from electronic reporting has been granted from the EPA Regional Office, in which case a paper DMR form may be submitted).

Report monitoring data to EPA as follows:

- All monitoring data collected pursuant to the MSGP 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:
    - All benchmark monitoring requirements have been fulfilled for the permit term;
    - All impaired waters monitoring requirements have been fulfilled for the permit term;
    - Benchmark and/or impaired monitoring requirements no longer apply because your facility is inactive and unstaffed;
    - Benchmark and/or impaired monitoring requirements now apply because your facility has changed from inactive and unstaffed to active and staffed;
    - For Sector G2 only: Discharges from waste rock and overburden piles have exceeded benchmark values;
    - A numeric effluent limitation guideline has been exceeded;
    - A numeric effluent limitation guideline exceedance is back in compliance.
- Completely fulfilled monitoring requirements are no longer required to be reported. Partially fulfilled benchmark monitoring and/or impaired waters monitoring requirements (e.g., four quarterly averages are below the benchmark for some, but not all, parameters; did not detect some, but not all, impairment pollutants), are continued to be reported in NetDMR, but report a "no data" or "NODI" code for any monitoring parameters that have been fulfilled.
- For benchmark monitoring, note that you are required to submit sampling results to EPA no later than 30 days after receiving your complete laboratory results for all monitored outfalls for each quarter that you are required to collect benchmark samples. If you collect samples during multiple storm events in a single quarter (e.g., due to adverse weather conditions, climates with irregular stormwater runoff, or areas subject to snow), you are required to submit all sampling results for each storm event to EPA within 30 days of receiving all laboratory results for the event. Or, for any of your monitored outfalls that did not have a discharge within the reporting period, using NetDMR you must report using a "no data" or "NODI" code for that outfall no later than 30 days after the end of the reporting period.

7.7 Additional Deliverables to EPA

The MSGP requires that most reporting information be submitted electronically via one of two EPA managed electronic systems: NPDES eReporting tool (NeT-MSGP) and NetDMR. Certain additional information is required to be submitted to the EPA Regional Office by mail on an infrequent basis. Other information is to be maintained in-house and only reported to EPA upon request. Table 7-2 identifies the reporting methods for various types of deliverables mandated in the permit.

Table 7-2: MSGP Reporting Requirements for Various Deliverables

EPA Reporting Method	Required Reports	Submittal Frequency
NeT MSGP	• Notice of Intent (NOI) • No Exposure Certification (NOE) • Notice of Termination (NOT) • Annual Report	• At least 30 days prior to new permit issuance • When eligible under "no exposure exclusion" • Within 30 days of termination eligibility • January 30th each year of permit coverage, containing information generated during the prior calendar year.
NetDMR	• Discharge Monitoring Report	• Within 30 days after receiving complete laboratory results for a reporting period
Mailing (hardcopy)	• New Dischargers and New Sources to Water Quality Impaired Waters • Exceedance Report for Numeric Effluent Limitations • Additional Reporting	• As required • As required (Effluent limitation monitoring is not currently required at NAVSTA Everett) • As required
Reporting only Required upon EPA Request	• Routine Facility Inspection Reports Quarterly Stormwater Discharge Visual Assessments Reports	• Only upon EPA request • Only upon EPA request

NeT MSGP is accessible through the Central Data Exchange (CDX) website at:

https://cdx.epa.gov/

From there, request access to the Program Service Name "NETEPAMSGP: NeT – EPA NPDES Stormwater Industrial Multi-Sector General Permit." New users will be prompted to identify a user role (certifier, duly authorized representative, permit administrator, or preparer).

For registration assistance, contact the CDX Help Desk at HELPDESK@EPACDX.NET or by telephone at (888) 890-1995.

NetDMR is accessible at:

https://cdxnodengn.epa.gov/net-netdmr/

Select "EPA Region 10 – Washington" from the dropdown list and click "Go.". The first person creating the account must have the legal signatory authority (certifier or duly authorized representative). New users must register for an account and then subsequently request access to a particular permit.

For further assistance, contact the NetDMR Help Desk at R10NetDMR@epa.gov or by telephone at (206) 553-8508 or (206) 553-0705.

Hardcopy submittals must be mailed to the following address:

U.S. EPA Region 10
NPDES Stormwater Program
1200 6th Avenue (OWW-191)
Seattle, WA 98101-3140

The following subsections further describe the routine reporting requirements mandated by the MSGP.

7.7.1 Annual Reports

Annual reports must be submitted electronically to the EPA via NeT-MSGP by January 30 for each year of permit coverage or by hard copy if permission is granted by the EPA containing information generated from the prior calendar year. The following information must be included:

- A summary of the past calendar year's routine facility inspection documentation.
- A summary of the past year's quarterly visual assessment documentation.
- For any four-sample (minimum) average benchmark monitoring exceedance, if after reviewing the selection, design, installation, and implementation of control measures and considering whether any modifications are necessary to meet the effluent limits in the permit, the facility determines that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice and the rationale for why it is believed that no further reductions are achievable (see MSGP Part 6.2.1.2); and
- A summary of the past year's corrective action documentation (see MSGP Part 4.4 and SWPPP Section 9). If a corrective action is not yet completed at the time of submission of the annual report, describe the status of any outstanding corrective action(s). Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that the facility is in compliance with the permit.

The Annual Report must include a statement that is signed and certified in accordance with MSGP Appendix B, Subsection 11.

7.7.2 Discharge Monitoring Reports

Adverse weather, extended dry weather periods resulting in no discharge, or other situations resulting in a lack of data collection do not exempt NAVSTA Everett from filing a DMR for the reporting period. Instead, any failure to monitor must be identified in the DMR using a "no data" or "NODI" code for the reporting period.

Once monitoring requirements have been completely fulfilled, the installation is no longer required to report monitoring results using NetDMR. If the requirements are only partially fulfilled, a "no data" or "NODI" code must be used for any monitoring parameters that have been fulfilled.

7.7.3 Effluent Limitations Monitoring Reports

NAVSTA Everett is not currently required to conduct effluents limitation monitoring. This section is preserved in the SWPPP as a reminder of the requirement, in the event that such monitoring is required in the future.

7.7.4 Routine Facility Inspection Reports

Findings from routine facility inspections must be maintained with this SWPPP and summarized in the Annual Report. They are not required to be submitted to the EPA unless specifically requested. Hardcopies of routine facility inspection reports may be maintained in Appendix F.

7.7.5 Quarterly Stormwater Discharge Visual Assessment Reports

Results of quarterly stormwater discharge visual assessments must be maintained with this SWPPP and summarized in the Annual Report. They are not required to be submitted to the EPA unless specifically requested. Hardcopies of the visual assessment reports may be maintained in Appendix G.

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8 Eligibility Considerations Under Other Federal Laws

Coverage under the MSGP is available only if NAVSTA Everett's stormwater discharges, allowable non-stormwater discharges, and stormwater discharge-related activities meet certain eligibility criteria associated with Endangered and Threatened Species and Critical Habitat Protection and with Historic Properties Preservation. NAVSTA Everett's eligibility considerations are described in the subsections below.

8.1 Endangered and Threatened Species

MSGP Part 1.1.4.5 authorizes permit coverage only if discharges and discharge-related activities are the subject of an Endangered Species Act (ESA) consultation or an ESA Section 10 permit or if the discharges and discharge-related activities are not likely to adversely affect any federally listed endangered or threatened species and any habitat designated as "critical habitat" under the ESA.

Natural resources at NAVSTA Everett are managed primarily through the Integrated Natural Resources Management Plan (INRMP). The INRMP was updated and signed in 2016 by U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and the Washington State Department of Fish and Wildlife (WDFW). The INRMP is used as a long-term planning document developed to guide the management of natural resources in support of the Navy's military mission, while protecting and enhancing natural resources for multiple uses, sustainable yield, and biological integrity. This INRMP complies with the legal requirements of the Conservation Programs on Military Installations Act (Sikes Act; 16 U.S.C. 670a et seq., as amended).

The goals of the INRMP are: (1) Ensure no net loss of the capability of installation lands to support the Department of Defense (DOD) mission; (2) Manage natural resources to assure good stewardship of public lands entrusted to the Navy; and (3) Comply with laws and instructions that pertain to the management of the Navy's properties and associated natural resources. These goals will be achieved by integrating management of fish and wildlife, habitat, facilities, and outdoor recreation, as practicable and consistent with the military mission and established land uses.

The USFWS, NMFS, and WDFW participate in the INRMP Review and Natural Resources Conservation Metrics with the Natural Resources Manager (NRM) for NAVSTA Everett on an annual basis. This process validates that NAVSTA Everett is in compliance with the Sikes Act and that the NRM is preparing, maintaining, and implementing the INRMP. Updates to the INRMP are compiled each year from this review. The NRM reviews the INRMP for operation and effect at least once every five years in cooperation with USFWS, NMFS, and WDFW. The focus of the review for operation and effect is to update the INRMP based on additions or revisions compiled during the annual INRMP review, update the goals and objectives, and update the implementation plan.

Pursuant to Section 7 of ESA, the DOD consults with USFWS or NMFS when threatened or endangered species or designated critical habitats may be affected in order to ensure that no DOD action will likely jeopardize the continued existence of listed species, or destroy or adversely modify designated critical habitats. The NRM is responsible for reviewing proposed projects, operations, or other actions within the NAVSTA Everett Area of Responsibility for

potential impacts to ESA-listed species through a formal review process. ESA Section 7 consultations will be initiated if warranted, otherwise, written documentation that there are no effects to ESA-listed species or critical habitats will be generated by the NRM and kept with the project files. The Navy enters into consultation with USFWS or NMFS if a proposed action, or restoration activity, may affect a threatened or endangered species or their critical habitat.

The Navy determined that NAVSTA Everett's stormwater discharges, allowable non-stormwater discharges, and discharge related activities would not cause adverse impacts to listed species or critical habitat. Therefore, the Navy filed for permit coverage under Criterion C at NAVSTA Everett. As defined in Criterion C, federally listed threatened and/or endangered species and/or their designated critical habitat(s) are likely to occur in or near NAVSTA Everett's "action area," and the installation's industrial discharges and discharge-related activities are not likely to adversely affect listed threatened or endangered species or critical habitat.

The MSGP-required Criterion C Eligibility Form was submitted for EPA review in December 2015, a minimum of 30 days prior to filing the facility's NOI in January 2016. Both of these forms document NAVSTA Everett's eligibility under Criterion C. A copy of the eligibility form and the NOI are in Appendix C.

The following Table 8-1 shows the species listed as endangered or threatened species and the critical habitat designated under the Endangeres Species Act that are documented or likely to be found within or adjacent to NAVSTA Everett:

Table 8-1: Endangered and Threatened Species at NAVSTA Everett

Species listed under the Endangered Species Act	Changes from 2015 to 2021	Endangered	Threatened	Critical Habitat At Installation	NAVSTA Everett
Species Parameter for 2021					
Marine Mammals					
Humpback Whale (Central America DPS)	unknown	x		No	Unlikely
Humpback Whale (Mexico DPS)	unknown		x	No	Unlikely
Killer Whale (Southern Resident DPS)	unknown	x		National Security Exclusion 71 FR 69054	Potentially
Birds					
Marbled Murrelet	unknown		x	No	Documented
Fishes					
Bull trout (Coastal Puget Sound DPS)	unknown		x	Exempt 75 FR 63898	Presumed
Chinook Salmon (Puget Sound ESU)	unknown		x	Exempt 70 FR 52630	Documented
Steelhead (Puget Sound DPS)	unknown		x	No	Presumed
Bocaccio Rockfish	unknown	x	x	Exempt and lack of habitat features near installation 79 FR 68041	Unlikely
Yelloweye Rockfish	unknown		x	Exempt and lack of habitat features near installation 79 FR 68041	Unlikely
North American Green Sturgeon (Southern DPS)	unknown			Exempt 74 FR 52300	Unlikely
Pacific Eulachon (Southern DPS)	unknown		x	No	Unlikely

Note: Where there is a critical habitat exemption or exclusion, the federal register citation is provided.
DPS = Distinct Population Segment

8.2 Historic Properties

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to take into account the effects of federal "undertakings" on historic properties that are either listed on or eligible for listing on the National Register of Historical Places. The EPA issuance of the MSGP is a federal undertaking within the meaning of the NHPA regulations. To address any issues relating to historic properties in connection with issuance of the 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.

Part 1.1.4.6 of the MSGP specifies that coverage under this permit is available only if your stormwater discharges, allowable non-stormwater discharges, and stormwater discharge related activities meet one or more of the eligibility criteria in the MSGP. Appendix F of the MSGP provides the procedures for determining which criteria are met.

There are no properties at NAVSTA Everett that are listed on the National Register of Historic Places. NAVSTA Everett meets Criterion A and is eligible for coverage under the MSGP. Criterion A states that "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." Appendix C of this SWPPP contains the NOI documentation that formed the basis of eligibility for compliance with the MSGP.

9 Corrective Actions

The MSGP requires implementation and documentation of corrective actions in response to certain deficiencies in the stormwater pollution prevention program. This section describes conditions that may trigger corrective action and the general responses required by the Navy.

If the event triggering the review is a permit violation (e.g., non-compliance with an effluent limit), correcting it does not remove the original violation. Additionally, failing to take corrective action in accordance with this section is an additional permit violation. EPA will consider the appropriateness and promptness of corrective action in determining enforcement responses to permit violations.

9.1 Conditions Requiring SWPPP Review/Revision to Ensure Effluent Limits are Met

When any of the following conditions occur or are detected during an inspection, monitoring, or by other means, NAVSTA Everett must review and revise, as appropriate, this SWPPP (e.g., sources of pollution; spill and leak procedures; non-stormwater discharges; the selection, design, installation and implementation of control measures) so that the MSGP's effluent limits are met and pollutant discharges are minimized:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit to a water of the U.S.) occurs at the facility.
- A discharge violates a numeric effluent limit listed in MSGP Table 2-1 and in MSGP Part 8 sector-specific requirements.
- Existing control measures are not stringent enough for the discharge to meet applicable water quality standards or the non-numeric effluent limits in this permit.
- A required control measure was never installed, was installed incorrectly, or not in accordance with Parts 2 and/or 8, or is not being properly operated or maintained.
- Whenever a visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).

9.2 Conditions Requiring SWPPP Review to Determine if Modifications are Necessary

If any of the following conditions occur, NAVSTA Everett must review this SWPPP (e.g., sources of pollution, spill and leak procedures, non-stormwater discharges, selection, design, installation and implementation of control measures) to determine if modifications are necessary to meet the effluent limits in the MSGP:

- Construction or a change in design, operation, or maintenance at the facility that significantly changes the nature of pollutants discharged in stormwater from the facility or significantly increases the quantity of pollutants discharged.
- The average of four quarterly sampling results exceeds an applicable benchmark (see MSGP Part 6.2.1.2). If less than four benchmark samples have been taken, but the results are such that an exceedance of the four quarter average is mathematically certain (i.e., if the sum of

quarterly sample results to date is more than four times the benchmark level), this is considered a benchmark exceedance triggering this review.

Notes:

A benchmark exceedance does not trigger a corrective action if it is determined that the exceedance is solely attributable to natural background sources or if it is found that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice (see MSGP Part 6.2.1.2).

When run-on to the facility causes a benchmark exceedance, in addition to reviewing and revising, as appropriate, this SWPPP, the installation should notify the other operators contributing run-on to NAVSTA Everett discharges to abate their pollutant contribution. Where the other operators fail to take action to address the stormwater run-on, the Navy should contact the EPA Regional Office.

9.3 Corrective Actions and Deadlines

If corrective action is needed, the MSGP requires that NAVSTA Everett immediately take all reasonable steps necessary to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational, including cleaning up any contaminated surfaces so that the material will not discharge in subsequent storm events. "Immediately" is defined as the same day such a condition requiring corrective action is identified. However, if a problem is identified at a time in the work day when it is too late to initiate corrective action, the initiation of corrective action must begin no later than the following work day.

If additional changes are necessary beyond those discussed above, the new or modified controls must be installed and made operational or repairs completed before the next storm event if possible and within 14 calendar days from the time of discovery. If it is infeasible to complete the corrective action within 14 calendar days, the Navy must document why it is infeasible to complete the corrective action within the 14-day timeframe. The Navy must also identify the schedule for completing the work, which must be done as soon as practicable after the 14-day timeframe but no longer than 45 days after discovery. If the completion of corrective action will exceed the 45 day timeframe, the Navy must notify the EPA Regional Office of its intention to exceed 45 days, the rationale for an extension, and a completion date, which must also be included in the corrective action documentation (see MSGP Part 4.4). Where the corrective actions result in changes to any of the controls or procedures documented in this SWPPP, the SWPPP must be revised accordingly within 14 calendar days of completing corrective action work.

These time intervals are not grace periods but are schedules considered reasonable by the EPA for documenting findings and for making repairs and improvements.

9.4 Corrective Action Documentation

Within 24 hours of becoming aware of any condition listed in SWPPP Section 9.1 or 9.2, the following information must be documented:

- Description of the condition triggering the need for corrective action review. For any spills or leaks, include 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 was identified.
- Description of immediate actions taken to minimize or prevent the discharge of pollutants. For any spills or leaks, include response actions, the date/time cleanup completed, notifications made, and staff involved. Also include any measures taken to prevent the reoccurrence of such releases (see MSGP Part 2.1.2.4).
- A statement signed and certified in accordance with MSGP Appendix B, Subsection 11.

The corrective action documentation is not required to be submitted to EPA unless the Navy is specifically requested to do so. However, applicable findings must be documented in the annual report to the EPA. Include the following information in the documentation:

- Summary of corrective actions taken or to be taken (or for triggering events in SWPPP Section 9.2 where it is determined that corrective action is not necessary, the basis for this determination) within 14 days from the time of discovery of any of those conditions;
- Dates when each corrective action was initiated;
- Dates when each corrective action was completed (or is expected to be completed);
- If applicable, why it is infeasible to complete the necessary installations or repairs within the 14-day timeframe;
- If applicable, the schedule for installing the controls and making them operational as soon as practicable after the 14-day timeframe; and,
- If applicable, the rational for an extension if the 45 day timeframe must be exceeded.

Completed corrective action documentation must be included in Appendix I or stored in a location that is referenced within the appendix.

9.5 Corrective Actions at Substantially Identical Outfalls

If the event triggering corrective action is associated with an outfall that had been identified as a "substantially identical outfall," the review must assess the need for corrective action for all related substantially identical outfalls. Any necessary changes to control measures that affect these other outfalls must also be made before the next storm event if possible or as soon as practicable following that storm event. NAVSTA Everett does not have substantially identical outfalls.

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APPENDIX A: SITE MAPS AND FIGURES

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Instructions:

- Include a copy of a general location map for reference.
- Include a copy of individual facility/site maps and figures.

The NAVSTA Everett SWPPP, including all appendices, is available in electronic (disc) and hard copy format. The disc includes a copy of the facility/site maps and figures. For access, contact the NAVSTA Everett Environmental Office at (425) 304-3277.

The general location map, Figure 2-1, is in Section 2.

Individual facility/site maps are in this appendix.

The individual facilty/site maps are also saved at the following location on the share drive:

W:\Region_Env\Everett\Stormwater\MSGP\SWPPP\2017 SWPPP\App A – Figures

List of Figures

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APPENDIX B: MULTI-SECTOR GENERAL PERMIT

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Instructions:

- Keep a copy of the MSGP accessible for easy reference.
- In accordance with the *EPA Industrial SWPPP Template, dated June 26, 2015*, the entire MSGP does not need to be formally incorporated into the SWPPP. As an alternative, provide a reference to the permit and where it is kept at the site.

The NAVSTA Everett SWPPP, including all appendices, is available in electronic (disc) and hard copy format. The disc includes a copy of the MSGP. For access, contact the NAVSTA Everett Environmental Office at (425) 304-3277.

An electronic copy of the 2021 MSGP is located at the following site:

SITE: https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-epas-2021-msgp

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APPENDIX C: NOTICE OF INTENT AND SUPPORTING DOCUMENTATION

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Instructions:

- Keep a copy of the NOI submitted to EPA along with any correspondence exchanged between you and EPA specific to coverage under this permit; and
- Keep a copy of the acknowledgment you receive from the EPA assigning your NPDES ID.

The NAVSTA Everett SWPPP, including all appendices, is available in electronic (disc) and hard copy format. The disc includes a copy of the NOI and supporting information, permit-specific correspondence between the Navy and EPA, and the acknowledgement received from EPA containing the NPDES ID number.

For access, contact the NAVSTA Everett Environmental Office at (425) 304-3277.

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APPENDIX D: EMPLOYEE TRAINING

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Instructions:

- Keep records of employee training; including the date of the training.
- For in-person training, consider using the tables below to document your employee trainings. For computer-based or other types of training, keep similar records on who was trained, the training date, and the type of training conducted.

EWCC training is provided annually for designated representatives of the ship and shore units assigned to NAVSTA Everett. Attendees must sign a training log to record their attendance at the class.

Sample training logs are provided on the following page. These logs are for reference only and are not required for use during training if an alternative preferred log is used.

The NAVSTA Everett Environmental Office maintains stormwater training records electronically. For access, contact the Environmental Office at (425) 304-3277.

Training Date: Insert Date of Training	
Training Description: Insert Description of Training	
Trainer: Insert Trainer(s) names	
Employee(s) trained	**Employee signature**
Insert Name	
Insert Name	
Insert Name	
Insert Name	
Insert Name	
Insert Name	

Training Date: Insert Date of Training	
Training Description: Insert Description of Training	
Trainer: Insert Trainer(s) names	
Employee(s) trained	**Employee signature**
Insert Name	
Insert Name	
Insert Name	
Insert Name	
Insert Name	
Insert Name	

Training Date: Insert Date of Training	
Training Description: Insert Description of Training	
Trainer: Insert Trainer(s) names	
Employee(s) trained	**Employee signature**
Insert Name	
Insert Name	
Insert Name	
Insert Name	
Insert Name	
Insert Name	

Training Date: Insert Date of Training	
Training Description: Insert Description of Training	
Trainer: Insert Trainer(s) names	
Employee(s) trained	**Employee signature**
Insert Name	
Insert Name	
Insert Name	
Insert Name	
Insert Name	
Insert Name	

APPENDIX E: MAINTENANCE

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Instructions:

- Include in your records documentation of maintenance and repairs of control measures and industrial equipment (see MSGP), including:
  - the control measure/equipment maintained,
  - date(s) of regular maintenance,
  - date(s) of discovery of areas in need of repair/replacement, and for repairs, date(s) that the control measure/equipment was returned to full function, and
  - the justification for any extended maintenance/repair schedules and the notification to your EPA Region that you need an extension past 45 days to complete repairs/maintenance.
- As a reminder:
  - you are required to take all reasonable steps to prevent or minimize the discharge of pollutants until the final repair or replacement is implemented.
  - final repair/replacements of stormwater controls should be completed as soon as feasible but no later than 14 days, or if that is infeasible within 45 days.
  - if the completion of stormwater control repairs/replacement will exceed the 45 day timeframe, you may take the minimum additional time necessary to complete the maintenance, provided you notify the EPA Regional Office and document your rationale in your SWPPP.

Note that maintenance documentation in this section is separate from required corrective action documentation. For any MSGP Part 4 corrective action triggering conditions, you must provide documentation consistent with Appendix I of this SWPPP.

The NAVSTA Everett Environmental Office maintains maintenance records electronically. For access, contact the Environmental Office at (425) 304-3277.

Date	Activity		Option			Type of Control Structure	Return to Full Function Date	Justification for any extended maintenance / repair schedule
	Regular Maintenance	New Discovery	Repair	Retrofit	Replace			

Date	Activity		Option			Type of Control Structure	Return to Full Function Date	Justification for any extended maintenance / repair schedule
	Regular Maintenance	New Discovery	Repair	Retrofit	Replace			

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APPENDIX F: ROUTINE FACILITY INSPECTION REPORTS

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Instructions:

- Include in your records copies of all routine facility inspection reports completed for the facility.
- The example inspection report provided is consistent with the requirements in Part 3.1.2 of the 2015 MSGP relating to routine facility inspections. The installation may use a different facility inspection form, if it is consistent with MSGP requirements.

An example Stormwater Industrial Facility Routine Inspection Form is provided on the following pages.

The completed inspection forms are saved on the share drive at the following:

W:\Region_Env\Everett\Stormwater\MSGP\Quarterly Facility Inspection

The NAVSTA Everett Environmental Office maintains completed Facility Inspection Forms electronically. For access, contact the Environmental Office at (425) 304-3277.

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Stormwater Industrial Facility Routine Inspection Form

General Information		
Facility Name:	Inspection Date:	Inspection Time:
Inspector Name:	Inspector Signature:	
Weather Information		
Weather at time of this inspection? ☐ Clear ☐ Cloudy ☐ Rain ☐ Sleet ☐ Fog ☐ Snow ☐ High Winds		
Temperature: ☐ Other:		

Industrial Facility Information

Bldg/ Location	Bldg/ Location Name	Sector	Previously Unidentified Discharges of Pollutants?	Control Measures Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Maintenance, Corrective Actions, or Additional Control Measures Needed; and Notes
Pier A	Carrier Pier	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
Pier B	Pier B	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
Pier D	Pier D	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
Pier E	Pier E	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	

Bldg/ Location	Bldg/ Location Name	Sector	Previously Unidentified Discharges of Pollutants?	Control Measures Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Maintenance, Corrective Actions, or Additional Control Measures Needed; and Notes
[redacted]	Laydown Area	P	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	PSNS & IMF Annex/South Wharf	P	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	North Wharf (North), Heavy Equipment Parking	P	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	North Wharf (South), USCG	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]			☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	USCG	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	Port Operations Boat House	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	

Bldg/ Location	Bldg/ Location Name	Sector	Previously Unidentified Discharges of Pollutants?	Control Measures Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Maintenance, Corrective Actions, or Additional Control Measures Needed; and Notes
[redacted]	Bio-Diesel Fuel Station	P	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	Port Operations	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	FRCNW	P	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	Trans. Maint./PWD	P	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	Haz Waste Storage Facility	P	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	USCG Bldg.	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	USCG Bldg.	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	

Bldg/ Location	Bldg/ Location Name	Sector	Previously Unidentified Discharges of Pollutants?	Control Measures Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Maintenance, Corrective Actions, or Additional Control Measures Needed; and Notes
[redacted]	Logistics Complex	P	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	PSNS & IMF, HAZ MIN	P	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	Sewage Lift Station	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	Steam Plant	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	Ship Support Equipment	P	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	Hose Cleaning Facility	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	Corr. Cont. Facility	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	

Bldg/ Location	Bldg/ Location Name	Sector	Previously Unidentified Discharges of Pollutants?	Control Measures Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Maintenance, corrective actions, or additional control measures needed; and notes
[redacted]	Recycling Center	N	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
[redacted]	Oil/Water Separator	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	

Outfall/Discharge Point Information

Outfall	Industrial Sector(s) Supported	Discharge occurring at outfall?	Pollution, or potential for pollution, observed?	Controls Adequate?	If No, In Need of Maintenance, Repair, or Replacement?	Observations regarding the physical condition of and around the outfall; maintenance, corrective actions, or additional control measures needed; and notes
Outfall A	Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
Outfall B	N, P, Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
Outfall C	P, Q	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
Outfall D	P	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	

Describe any incidents of non-compliance observed and not described above:

List any stormwater control measures needing maintenance, repairs, or replacement:

List any additional stormwater control measures needed to comply with the permit requirements:

Certification Statement (MSGP Appendix B Subpart 11)

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 ensure 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, to the best of my knowledge and belief, is 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.

Name: Title:

Signature: Date Signed:

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APPENDIX G: QUARTERLY VISUAL ASSESSMENT REPORTS

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Instructions:

Include in your records:

- Copies of all quarterly visual assessment reports completed for the facility. An example quarterly visual assessment report can be found on the following page. The installation may use a different report, if it is consistent with MSGP requirements.
- A description of any deviations from the schedule you provided in your SWPPP for visual assessments, and
- The reason for the deviations (e.g., adverse weather or it was impracticable to collect samples within the first 30 minutes of a measurable storm event).

Document any deviations on the quarterly visual assessment reports, as necessary.

An example Quarterly Visual Assessment Form is provided on the following pages.

The completed inspection forms are saved on the share drive at the following:

W:\Region_Env\Everett\Stormwater\MSGP\Quarterly Visual Outfall Inspection

The NAVSTA Everett Environmental Office maintains completed Visual Assessment Forms electronically. For access, contact the Environmental Office at (425) 304-3277.

Quarterly Visual Assessment Report

Fill out a separate form for each sample collected (one form per outfall)

Facility		**Outfall ID**		**Year**		**Quarter**	
Qualifying Storm		☐ Yes ☐ No		**Runoff Source**		☐ Rainfall ☐ Snowmelt	
Sample Collected for Lab Analyses:		☐ Yes ☐ No		**Date / Time**			
Sample Observed Only:		☐ Yes ☐ No		**Date / Time**			

Was the sample collected within the first 30 minutes: ☐ Yes ☐ No ☐ NA
Reason for not possibly taking the samples within the first 30 minutes:
☐ Limited Personnel on Duty ☐ Logistics ☐ Safety Issues ☐ Adverse Weather ☐ Other:

Parameter	Parameter Description	Parameter Characteristics
Color	Does the stormwater appear to have any color? ☐ Yes ☐ No	If Yes, describe: *Yelllow Brown Red Gray Other:*
Clarity	Is the stormwater clear? ☐ Yes ☐ No	If not clear, describe:*Suspended Solids Milky/Cloudy Opaque Other:*
Oil Sheen	Can you see a rainbow effect or sheen on the water surface? ☐ Yes ☐ No	Which best describes the sheen? *Rainbow Sheen Floating oil globules Other:*
Odor	Does the sample have an odor? ☐ Yes ☐ No	If Yes, describe: *Chemical Musty Rotten Eggs Sewage Sour Milk Excrement Other:*
Floating Solids	Is there anything on the surface of the sample? ☐ Yes ☐ No	If Yes, describe: *Suds Oily Film Garbage Sewage Water Fowl Excrement Other:*
Suspended Solids	Is there anything suspended in the sample? ☐ Yes ☐ No	If Yes, describe:
Settled Solids	Is there anything settled on the bottom of the sample? ☐ Yes ☐ No	If Yes, describe:
Foam	Is there foam or material foaming on the top of the sample surface? ☐ Yes ☐ No	If Yes, describe:

Probable sources of any observed stormwater contamination: ☐ NA ☐ Parking / Grounds ☐ Painting ☐ Fueling ☐ Maintenance ☐ Washing ☐ Material Handling ☐ Outdoor Storage ☐ Other:

Collector:		**Signature:**	
Signed and certified in accordance with the 2021 MSGP Appendix B, Subsection 11.			
Name:		**Signature:**	

Note – Sample should be collected and analyzed in a colorless glass or plastic bottle.

APPENDIX H: MONITORING RESULTS AND AIM DOCUMENTATION

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Instructions:

Include in your records copies of all monitoring results (including analytical laboratory data, benchmarks, effluent limits, and other monitoring conducted) for the facility. Also include copies of monitoring data submitted to EPA's NetDMR reporting system or paper Industrial Discharge Monitoring Reports (DMRs) if EPA has issued your facility a waiver from electronic reporting.

Include in your records:

- A description of any deviations from the schedule you provided in your SWPPP for visual assessments and/or monitoring, and
- The reason for the deviations (e.g., adverse weather or it was impracticable to collect samples within the first 30 minutes of a measurable storm event) (MSGP).

Include in your records documentation of any four quarter average benchmark exceedances and how they were responded to, including either:

- (1) corrective action taken,
- (2) a finding that the exceedance was due to natural background pollutant levels,
- (3) a determination from the EPA Regional Office that benchmark monitoring can be discontinued because the exceedance was due to run-on, or
- (4) a finding that no further pollutant reductions were technologically available and economically practicable and achievable in light of best industry practice consistent with the MSGP.

A data summary of stormwater monitoring conducted during the prior permit term is provided in Section 4.5 of this SWPPP.

The NAVSTA Everett Environmental Office maintains monitoring results under the existing permit electronically. For access, contact the Environmental Office at (425) 304-3277.

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Quarterly Benchmark Monitoring Results During Previous Permit Terms

Outfall	Parameter	Units	Benchmark	5 Nov 2009	1 Jan 2010 to 31 Mar 2010	1 Apr 2010 to 30 Jun 2010	26 Aug 2010	1 Oct 2010 to 31 Dec 2010	1 Jan 2011 to 31 Mar 2011	2 May 2011	26 Sep 2011	30 Dec 2011	1 Jan 2012 to 31 Mar 2012	1 Apr 2012 to 30 Jun 2012	13 Jul 2012	28 Nov 2012	23 Jan 2013	4 Apr 2013	2 Aug 2013	7 Oct 2013	19 Mar 2014	1 Apr 2014 to 30 Jun 2014	1 Jul 2014 to 30 Sep 2014	23 Dec 2014	31 Mar 2015	12 May 2015	24 Jul 2015	7 Oct 2015	12 Apr 2016	29 Apr 2016	1 Jul 2016 to 30 Sep 2016	29 Oct 2016
A	Aluminum	µg/L	750	***1400***	NQE	NQE	***1180***	NQE	NQE	540	300	***1060***	NQE	NQE	360	350	***1030***	610	***2030***	***1310***	***3820***	NQE	NQE	430	***1050***	***950***	***1290***	240	***3605***	310	NQE	496
	Iron	µg/L	1000	700	NQE	NQE	***1950***	NQE	NQE	780	600	***2230***	NQE	NQE	560	580	***1740***	***1080***	***2380***	420	***1230***	NQE	NQE	560	200	***1490***	***1820***	520	***5801***	410	NQE	952
	Lead	µg/L	262	ND	NQE	NQE	49	NQE	NQE	16	14	32	NQE	NQE	9.5	0.7	19	18	53	4.6	15	NQE	NQE	2.3	1.8	18	15	4	n/a	n/a	NQE	8.4
	Zinc	µg/L	117	ND	NQE	NQE	EPA mandated Zinc and Copper data summarized in Table 3-7: Monthly Copper and Zinc Monitoring																												
	Copper	µg/L	14	15	NQE	NQE																										
B	Aluminum	µg/L	750	1500	NQE	NQE	***1810***	NQE	NQE	290	420	410	NQE	NQE	250	610	520	460	***2160***	***5670***	***2290***	NQE	NQE	510	540	***1570***	570	120	n/a	n/a	NQE	285
	Iron	µg/L	1000	1200	NQE	NQE	***2260***	NQE	NQE	470	900	530	NQE	NQE	470	***1760***	730	630	***2600***	670	***1320***	NQE	NQE	590	420	***1960***	840	250	n/a	n/a	NQE	780
	Lead	µg/L	262	ND	NQE	NQE	23	NQE	NQE	6	6	5	NQE	NQE	12	4	8	2.6	18	3	7	NQE	NQE	0.8	2.2	7	5	1.5	n/a	n/a	NQE	1.6
	Zinc	µg/L	117	ND	NQE	NQE	EPA mandated Zinc and Copper data summarized in Table 3-7: Monthly Copper and Zinc Monitoring																												
	Copper	µg/L	14	ND	NQE	NQE																										
	TSS	mg/L	100	23	NQE	NQE	63	NQE	NQE	14	14	14	NQE	NQE	11	15	13	25	57	16	51	NQE	NQE	15	14	34	22	5	n/a	n/a	NQE	13
	COD	mg/L	120	18	NQE	NQE	86	NQE	NQE	44	***750***	16	NQE	NQE	89	***160***	ND	72	***150***	38	50	NQE	NQE	***208***	33	***229***	70	84	n/a	n/a	NQE	82
C	Aluminum	µg/L	750	1800	NQE	NQE	***820***	NQE	NQE	***850***	430	400	NQE	NQE	***1400***	190	570	190	***6340***	***1120***	***1060***	NQE	NQE	700	480	90	420	240	n/a	n/a	NQE	201
	Iron	µg/L	1000	3200	NQE	NQE	***1510***	NQE	NQE	***3970***	***5080***	***1490***	NQE	NQE	***6770***	640	***4380***	***1960***	***15150***	940	***1940***	NQE	NQE	520	850	***1510***	***1200***	***1140***	***20577***	***1320***	NQE	888
	Lead	µg/L	262	ND	NQE	NQE	14	NQE	NQE	4	3	6	NQE	NQE	8	4	8	1	7	1	4	NQE	NQE	0.2	0.7	1	3	0.94	n/a	n/a	NQE	0.6
	Zinc	µg/L	117	ND	NQE	NQE	EPA mandated Zinc and Copper data summarized in Table 3-7: Monthly Copper and Zinc Monitoring																												
	Copper	µg/L	14	ND	NQE	NQE																										

Italic: Individual sample exceeds benchmark or target value
ND: Not Detected Above Method Detection Limit
NQE: No Qualifying Event
µg/L: Microgram Per Liter

Outfall	A		B		C	
Analyte	**Copper**	**Zinc**	**Copper**	**Zinc**	**Copper**	**Zinc**
Units	**µg/L**	**µg/L**	**µg/L**	**µg/L**	**µg/L**	**µg/L**
Benchmark	**14**	**117**	**14**	**117**	**14**	**117**
Nov 2009	***15***	ND	ND	ND	ND	ND
Dec 2009	NQE	NQE	NQE	NQE	NQE	NQE
Jan 2010	NQE	NQE	NQE	NQE	NQE	NQE
Feb 2010	NQE	NQE	NQE	NQE	NQE	NQE
Mar 2010	NQE	NQE	NQE	NQE	NQE	NQE
Apr 2010	NQE	NQE	NQE	NQE	NQE	NQE
May 2010	NQE	NQE	NQE	NQE	NQE	NQE
Jun 2010	NQE	NQE	NQE	NQE	NQE	NQE
Jul 2010	NQE	NQE	NQE	NQE	NQE	NQE
Aug 2010	***47***	***190***	***33***	***170***	***15***	***150***
Sep 2010	8	38	7	61	2	25
Oct 2010	NQE	NQE	NQE	NQE	NQE	NQE
Nov 2010	NQE	NQE	NQE	NQE	NQE	NQE
Dec 2010	***19***	95	6	53	2	24
Jan 2011	***29***	80	8	50	2	59
Feb 2011	NQE	NQE	NQE	NQE	NQE	NQE
Mar 2011	NQE	NQE	NQE	NQE	NQE	NQE
Apr 2011	NQE	NQE	NQE	NQE	NQE	NQE
May 2011	***21***	100	12	69	9	59
Jun 2011	NQE	NQE	NQE	NQE	NQE	NQE
Jul 2011	NQE	NQE	NQE	NQE	NQE	NQE
Aug 2011	NQE	NQE	NQE	NQE	NQE	NQE
Sep 2011	***70***	90	***27***	***120***	14	***200***
Oct 2011	NQE	NQE	NQE	NQE	NQE	NQE
Nov 2011	NQE	NQE	NQE	NQE	NQE	NQE
Dec 2011	***48***	***299***	8	74	6	49
Jan 2012	NQE	NQE	NQE	NQE	NQE	NQE
Feb 2012	NQE	NQE	NQE	NQE	NQE	NQE
Mar 2012	NQE	NQE	NQE	NQE	NQE	NQE
Apr 2012	***450***	***227***	***21***	108	7	56
May 2012	NQE	NQE	NQE	NQE	NQE	NQE
Jun 2012	NQE	NQE	NQE	NQE	NQE	NQE
Jul 2012	***39***	99	***27***	96	***23***	***144***
Aug 2012	NQE	NQE	NQE	NQE	NQE	NQE
Sep 2012	NQE	NQE	NQE	NQE	NQE	NQE
Oct 2012	NQE	NQE	NQE	NQE	NQE	NQE
Nov 2012	***236***	42	9	105	10	***143***
Dec 2012	NQE	NQE	NQE	NQE	NQE	NQE
Jan 2013	***64***	***220***	10	105	10	81
Feb 2013	NQE	NQE	NQE	NQE	NQE	NQE
Mar 2013	NQE	NQE	NQE	NQE	NQE	NQE
Apr 2013	***126***	***381***	***39***	***186***	7	66
May 2013	NQE	NQE	NQE	NQE	NQE	NQE
Jun 2013	***43***	***162***	***26***	89	***22***	***158***

Italic: Individual sample exceeds benchmark or target value
ND: Not Detected Above Method Detection Limit
NQE: No Qualifying Event
µg/L: Microgram Per Liter

Outfall	A		B		C	
Analyte	**Copper**	**Zinc**	**Copper**	**Zinc**	**Copper**	**Zinc**
Units	**µg/L**	**µg/L**	**µg/L**	**µg/L**	**µg/L**	**µg/L**
Benchmark	**14**	**117**	**14**	**117**	**14**	**117**
Jul 2013	NQE	NQE	NQE	NQE	NQE	NQE
Aug 2013	***240***	***641***	***61***	***241***	***56***	***278***
Sep 2013	NQE	NQE	NQE	NQE	NQE	NQE
Oct 2013	***21***	59	***25***	113	11	42
Nov 2013	NQE	NQE	NQE	NQE	NQE	NQE
Dec 2013	NQE	NQE	NQE	NQE	NQE	NQE
Jan 2014	NQE	NQE	NQE	NQE	NQE	NQE
Feb 2014	NQE	NQE	NQE	NQE	NQE	NQE
Mar 2014	***38***	***209***	***20***	105	13	60
Apr 2014	NQE	NQE	NQE	NQE	NQE	NQE
May 2014	NQE	NQE	NQE	NQE	NQE	NQE
Jun 2014	NQE	NQE	NQE	NQE	NQE	NQE
Jul 2014	NQE	NQE	NQE	NQE	NQE	NQE
Aug 2014	NQE	NQE	NQE	NQE	NQE	NQE
Sep 2014	***70***	***160***	***22***	103	***24***	65
Oct 2014	NQE	NQE	NQE	NQE	NQE	NQE
Nov 2014	NQE	NQE	NQE	NQE	NQE	NQE
Dec 2014	8	46	6	61	5	27
Jan 2015	NQE	NQE	NQE	NQE	NQE	NQE
Feb 2015	NQE	NQE	NQE	NQE	NQE	NQE
Mar 2015	***24***	98	10	91	10	75
Apr 2015	NQE	NQE	NQE	NQE	NQE	NQE
May 2015	***42***	***150***	***70***	***448***	8	39
Jun 2015	NQE	NQE	NQE	NQE	NQE	NQE
Jul 2015	***59***	***153***	***19***	78	***30***	93
Aug 2015	***66***	***137***	***36***	94	4	30
Sep 2015	NQE	NQE	NQE	NQE	NQE	NQE
Oct 2015	***108***	***194***	***15***	49	6.8	33
Nov 2015	NQE	NQE	NQE	NQE	NQE	NQE
Dec 2015	NQE	NQE	NQE	NQE	NQE	NQE
Jan 2016	NQE	NQE	NQE	NQE	NQE	NQE
Feb 2016	***30***	95	***19***	91	4.3	53
Mar 2016	NQE	NQE	NQE	NQE	NQE	NQE
12 Apr 2016	***98***	***508***	***26***	***121***	***27***	89
29 Apr 2016	8.5	37	10.5	81	2.5	20
May 2016	NQE	NQE	NQE	NQE	NQE	NQE
Jun 2016	NQE	NQE	NQE	NQE	NQE	NQE
Jul 2016	NQE	NQE	NQE	NQE	NQE	NQE
Aug 2016	NQE	NQE	NQE	NQE	NQE	NQE
Sep 2016	NQE	NQE	NQE	NQE	NQE	NQE
Oct 2016	***22***	96	8.3	62	4.5	23
Nov 2016	***16***	***181***	5.4	46	3.9	38
Dec 2016	NQE	NQE	NQE	NQE	NQE	NQE

Italic: Individual sample exceeds benchmark or target value
ND: Not Detected Above Method Detection Limit
NQE: No Qualifying Event
µg/L: Microgram Per Liter

APPENDIX I: CORRECTIVE ACTION DOCUMENTATION

Corrective Action Form (MSGP Part 6.5.7)

(Complete this section within 24 hours of discovering the condition that triggered corrective action)

Date Problem Discovered		Time Problem Discovered	
Inspector Name		Signature	

What site conditions triggered the requirement to conduct corrective action *(check the box that applies)*:

- ☐ A required stormwater control was never installed, was installed incorrectly, or not in accordance with the MSGP.
- ☐ The stormwater controls that have been installed and maintained are not effective enough for the discharge to meet applicable water quality standards or applicable requirements in the MSGP.
- ☐ A prohibited discharge has occurred or is occurring
- ☐ EPA requires corrective action as a result of permit violations found during an EPA inspection carried out under MSGP

Provide a description of the problem:

Deadline for completing corrective action (*Enter date that is either: (1) no more than 7 calendar days after the date you discovered the problem, or (2) if it is infeasible to complete work within the first 7 days, enter the date that is as soon as practicable following the 7th day)*:	**Date:**	

Stormwater Control Modifications to be Implemented to Correct the Problem		**Date of Completion**		**Was SWPPP Update Necessary?** ☐ YES ☐ NO
Stormwater Control Modifications to be Implemented to Correct the Problem		**Date of Completion**		**Was SWPPP Update Necessary?** ☐ YES ☐ NO

"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."

Signature of Permittee or "Duly Authorized Representative": _____ **Date:** _____

Printed Name and Affiliation: _____

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Instructions:

Within 24 hours of becoming aware of a condition identified in the MSGP, document the existence of the condition and subsequent actions. Note that this information must be summarized in the annual report (as required in the MSGP).

The NAVSTA Everett Environmental Office maintains an up-to-date corrective actions tracking system electronically. For access, contact the Environmental Office at (425) 304-3277

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APPENDIX J: MISCELLANEOUS DOCUMENTATION

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Instructions:

Use this section to keep records of any additional documentation that relates to your compliance with the permit.

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