**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**REGION 10**
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Seattle, WA 98101-3140

OFFICE OF
WATER AND WATERSHEDS

Reply to Attn of: OWW-191

DEC 10 2015

Paul T. Steucke
Joint Base Lewis-McChord
BLDG 2012 Liggett Avenue
Box 339500 MS 17
Joint Base Lewis-McChord, WA 98433

Re: Additional Monitoring Requirements for Joint Base Lewis-McChord under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. WAR05F305

Dear Mr. Steucke:

The purpose of this letter is to notify you of additional monitoring requirements that must be implemented at your facility to maintain permit coverage under the U.S. Environmental Protection Agency's (EPA) 2015 Multi-Sector General Permit for Storm water Discharges Associated with Industrial Activity (MSGP).

When MSGP was last reissued in 2008, the National Marine Fisheries Service (NMFS) formally required additional monitoring of discharges to Puget Sound to protect juvenile salmon. In order to obtain NMFS' concurrence that the facility's storm water discharges would not likely adversely affect endangered species or critical habitat, Puget Sound dischargers must conduct additional monitoring for hardness, dissolved zinc, and dissolved copper, and conduct corrective actions until their discharges are below the target levels.

When EPA notified Joint Base Lewis-McChord (JBLM) of additional copper and zinc monitoring requirements under the 2008 MSGP as per NMFS, the letter specified freshwater benchmark values of 5.6 ug/L and 50 ug/L, which were based on an assumption of hardness in the 25-50 range. JBLM has measured the hardness of the water and found the measured average hardness to be 52 mg/L, which means the corresponding benchmark values in the MSGP Appendix J are 9 µg/L copper and 80 µg/L zinc. NMFS regards the freshwater benchmark values of 5.6 ug/L and 50 ug/L as the appropriate ones for Puget Sound, but realizes that water hardness fluctuates due to real-time conditions within the receiving waterbody. JBLM may use the 9ug/L copper and 80 ug/L zinc benchmarks when appropriate, realizing that this may change based on the measured hardness over the permit cycle.

Specific Requirements

Pursuant to Part 6.2.5 of the MSGP, the Facility is required to conduct storm water monitoring for dissolved copper and dissolved zinc following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1.

If you have any questions, please contact Margaret McCauley of my staff at mccauley.margaret@epa.gov or (206) 553–1772.

Sincerely,

Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Sean Callahan, National Marine Fisheries Service