



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

NOV 19 2015

OFFICE OF  
WATER AND  
WATERSHEDS

Reply to Attn of: OWW-191

Dave Torgersen  
88th Regional Support Command  
60 South O Street  
Fort McCoy, Wisconsin 54656

Re: Additional Requirements for the National Guard Commencement Bay under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. WAR05F300

Dear Mr. Torgersen:

The purpose of this letter is to notify you of additional controls and monitoring that must be implemented at your facility to obtain 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). Based on the information provided in your Notice of Intent (NOI), storm water from the 88th Regional Support Command Area Maintenance Support Activity (AMSA) 137/Pier 23 Facility at 401 Alexander Avenue in Tacoma, Washington (Facility) discharges into Commencement Bay. This portion of Commencement Bay is within the Commencement Bay Nearshore/Tideflats Superfund Site Operable Unit 1, which is a CERCLA Site as defined and referenced in Appendices A and P of the MSGP. In accordance with Section 1.1.4.10 of the MSGP and consistent with the requirements of the State of Washington's 401 certification that are incorporated into the MSGP (see Part 9.10.7), EPA Region 10 has reviewed your NOI and has determined that additional monitoring of your facility's industrial storm water is necessary.

#### Storm Water Monitoring

Permittees discharging to Commencement Bay either directly or indirectly through a stormwater drainage system, shall sample the storm water discharge quarterly for the following Commencement Bay Nearshore/Tideflats Superfund Site Operable Unit 1 identified Contaminants of Concern (CoCs)<sup>1</sup> in Table 1. The Target values are the acute marine Washington State Water Quality Criteria (WAC 173-201A-240) with the exception of Total Suspended Solids (TSS), which is from Part 9.10.7.3 of the Permit:

**Table 1. Quarterly Storm Water Monitoring**

Parameter	Units	Target
TSS	mg/L	30
Arsenic	µg/L	69
Copper	µg/L	4.8
Lead	µg/L	8.1

<sup>1</sup> Superfund Record of Decision: Commencement Bay Nearshore/ Tideflats, WA, U.S. Environmental Protection Agency, September 1989, EPA/ROD/R10-89/020

Parameter	Units	Target
Mercury	µg/L	1.8
Zinc	µg/L	90
Pentachlorophenol	µg/L	1
PCBs	µg/L	10

### Storm Drain Solids Sampling and Cleaning

Permittees discharging to Commencement Bay either directly or indirectly through a stormwater drainage system, shall sample and analyze storm drain solids at least once prior to cleaning the storm drain lines for the parameters in Table 2, which combines Commencement Bay Nearshore/Tideflats Superfund Site Operable Unit 1 identified Contaminants of Concern (CoCs) and the parameters required as part of Washington State's certification of the MSGP (Part 9.10.7 of the Permit).

**Table 2. Analysis of Storm Drain Solids**

Parameter	Method	Target value
Percent total solids	SM 2540G, or ASTM Method D 2216	NA
Total organic carbon	Puget Sound Estuary Protocols (PSEP 1997), or EPA 9060	NA
Grain size	Ecology Method Sieve and Pipette (ASTM 1997), ASTMD422, or PSEP 1986/2003	NA
Antimony, total	EPA Method 200.8 (ICP/MS), EPA Method 6010 or EPA Method 6020	150 mg/kg
Arsenic, total	EPA Method 200.8 (ICP/MS), EPA Method 6010 or EPA Method 6020	57 mg/kg
Beryllium, total	EPA Method 200.8 (ICP/MS), EPA Method 6010 or EPA Method 6020	Report only <sup>a</sup>
Cadmium, total	EPA Method 200.8 (ICP/MS), EPA Method 6010 or EPA Method 6020	5 mg/kg
Chromium, total	EPA Method 200.8 (ICP/MS), EPA Method 6010 or EPA Method 6020	260 mg/kg
Copper, total	EPA Method 200.8 (ICP/MS), EPA Method 6010 or EPA Method 6020	390 mg/kg
Lead, total	EPA Method 200.8 (ICP/MS), EPA Method 6010 or EPA Method 6020	450 mg/kg
Mercury, total	EPA Method 200.8 (ICP/MS), EPA Method 6010 or EPA Method 6020	1 mg/kg
Nickel, total	EPA Method 200.8 (ICP/MS), EPA Method 6010 or EPA Method 6020	140 mg/kg
Selenium, total	EPA Method 200.8 (ICP/MS), EPA Method 6010 or EPA Method 6020	Report only <sup>a</sup>
Silver, total	EPA Method 200.8 (ICP/MS), EPA Method 6010 or EPA Method 6020	6 mg/kg
Thallium, total	EPA Method 200.8 (ICP/MS), EPA Method 6010 or EPA Method 6020	Report only <sup>a</sup>
Zinc, total	EPA Method 200.8 (ICP/MS), EPA Method 6010 or EPA Method 6020	410 mg/kg
LPAH compounds	EPA Method 8270 D	5,200 µg/kg dry weight
HPAH compounds	EPA Method 8270 D	12,000 µg/kg dry weight
PCBs (arochlors), total <sup>b,c</sup>	EPA Method 8082	300 µg/kg dry weight

Parameter	Method	Target value
Hexachlorobenzene	Method 8081-PSEP	22 µg/kg dry weight
Dimethyl phthalate	EPA Method 8270	160 µg/kg dry weight
Diethyl phthalate	EPA Method 8270	200 µg/kg dry weight
Di-butyl phthalate	EPA Method 8270	1400 µg/kg dry weight
Butyl benzyl phthalate	EPA Method 8270	900 µg/kg dry weight
Bis(2 ethylhexyl) phthalate	EPA Method 8270	1300 µg/kg dry weight
Di-n-octyl phthalate	EPA Method 8270	6,200 µg/kg dry weight
Phenol	EPA Method 8270	420 µg/kg dry weight
2-Methylphenol	EPA Method 8270	63 µg/kg dry weight
4-Methylphenol	EPA Method 8270	670 µg/kg dry weight
2,4-Dimethylphenol	EPA Method 8270	29 µg/kg dry weight
Pentachlorophenol	EPA Method 8270-SIM	360 µg/kg dry weight
Petroleum hydrocarbons	NWTPH-Dx	Report only <sup>a</sup>

Notes on Table 2:

- These parameters come from the Washington State 401 certification and are “report only” for the 2015 permit.
- Total = sum of PCB aroclors 1016+1221+1232+1242+1248+1254+1260.
- The PCB target value comes from the July 28, 1997 Explanation of Significant Differences for the Commencement Bay Nearshore/Tideflats CERCLA site

Permittees shall sample and analyze storm drain solids in accordance with the table above and with Part 9.10.7.3 at least once prior to cleaning the storm drain lines and prior to November 1, 2016. Storm drain solids must be collected/sampled from either a composited sample representative of the entire site or a grab sample from each catch basin. Submit the results of the sample analysis together with a copy of the Sampling Analysis Plan including a figure of the storm drain system on site to the U.S. EPA, either by electronic or U.S. mail:  
 MSGP Coordinator, U.S. EPA, Region 10, OWW-101, 1200 Sixth Avenue, Seattle WA 98101

After sample and analysis of storm drain solids, the Permittee shall remove accumulated solids from storm drain lines (including inlets, catch basins, sumps, conveyance lines, and oil/water separators) owned or controlled by the Permittee at least once prior to November 1, 2016, following the terms in Part 9.10.7.3.

If the U.S. Army Reserve can demonstrate, based on video inspection, in-line storm drain solids sampling, or other documentation, that storm drain line cleaning is not necessary to prevent downstream sediment contamination or recontamination, EPA may waive this requirement.

Requests for line cleaning waivers or time extensions must be accompanied by a modification of coverage form, and a detailed technical basis to support the request. The due date for line cleaning waiver and extension requests is May 15, 2016.

**Action needed:**

To become eligible to discharge under the MSGP, you must confirm that you accept these requirements and will comply with them as part of your overall compliance with the MSGP. Please communicate that acceptance in writing.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Lidgard".

Michael J. Lidgard, Manager  
NPDES Permits Unit