



DEPARTMENT OF THE NAVY
OFFICE OF THE ASSISTANT SECRETARY
(INSTALLATIONS AND ENVIRONMENT)
1000 NAVY PENTAGON
WASHINGTON, D.C. 20350-1000

MAY 25 2000

U.S. Environmental Protection Agency
ATTN: MSGP-2000 Comments
W-99-26, MC 4101
Room EB 57
401 M Street SW
Washington, DC 20460

Re: PROPOSED REISSUANCE OF NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES) STORM WATER MULTI-SECTOR GENERAL
PERMIT FOR INDUSTRIAL ACTIVITIES (65 FR 17010)

Dear Sir/Madam:

Enclosed are consolidated comments prepared by the DoD's Clean Water Act Services Steering Committee (CWASSC) on the proposed reissuance of the National Pollutant Discharge Elimination System (NPDES) Storm Water Multi-Sector General Permit (MSGP) for industrial activities. The DoD CWASSC represents the Departments of the Navy, Air Force, and Army, as well as several other Defense components. The Navy is the executive agent for the Clean Water Act issues for DoD and chair of the CWASSC.

The CWASSC supports the NPDES permitting policy as an important tool in protecting our nation's water resources. However, we recommend the following changes be incorporated into the final rule in order to assist the regulated community in interpreting the NPDES Storm Water MSGP requirements. Among other things, the rule should: 1) distinguish between regulated industrial facilities and large installations that resemble a small municipal separate storm sewer system (MS4) and have incidental industrial activities; 2) clarify the circumstances under which enforceable actions are to be taken when permitted discharges cause or contribute to a violation of a water quality standard, the conditions under which velocity dissipation devices are necessary, and that Sector T requirements are applicable to treatment works with or above a design capacity of 1.0 million gallons per day; and 3) extend the time frame for Storm Water Pollution Prevention Plan (SWPPP) revisions after a Site Compliance Evaluation.

As you revise the NPDES Storm Water MSGP for industrial activities, please consider the enclosed recommendations. If you have any questions, my point of contact is Ms. Kathy Ellis, CWASSC Chairperson, at (703) 602-2568 or email ellis.kathy@hq.navy.mil.

Elsie L. Munsell

ELSIE L. MUNSELL
Deputy Assistant Secretary of the Navy
(Environment and Safety)

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