

U.S. NAVAL BASE GUAM



MS4 Annual Report (Year 5)

MS4 Permit No.: GUS040000

April 2024

Prepared by:



N40192-21-D-1820

U.S. Naval Base Guam

Municipal Separate Storm Sewer System (MS4) Permit No.:

GUS040000 Reporting Period: February 1, 2023 – January 31, 2024

Certification Statement

"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 gather and evaluate 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."

Sincerely,



E.E. Moon

Installation Environmental Program Director
By Direction of the Commanding Officer

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Section 1 INTRODUCTION

The following “U.S. Naval Base Guam (NBG) Year 5 MS4 Annual Report,” fulfills the annual reporting requirements of the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit No. GUS040000. According to the compliance schedule specified in Table 4, Part 5.5 of the permit, NBG must submit its MS4 annual reports on or before April 30th following each respective permit year. The report should account for all permit compliance activities of the previous permit year.

This report is submitted to:

NPDES Permit
Section USEPA
Region 9
75 Hawthorne Street
San Francisco, CA 94105

Guam EPA – Water Pollution Control Program
P.O. Box 22439
Barrigada, GU 96921

1.1 Compliance History

The United States Environmental Protection Agency (USEPA) issued the NBG MS4 permit on December 20, 2018, and became effective on February 1, 2019. This permit authorized NBG to discharge stormwater and other non-prohibited discharges from all outfalls of NBG's MS4. This permit also requires NBG to effectively prohibit all type of non-storm water discharges into its MS4 unless such discharges are either authorized under a separate NPDES permit or listed as allowable non-stormwater discharge in Part 1.3.2 of the MS4 permit.

1.2 Permit and Installation Information

The Department of the Navy NPDES permit GUS040000 applies to Naval Base Guam (NBG) owned and operated MS4 which includes the following existing facilities:

- NBG at Apra Harbor (NBGAH).
- Family housing / community support areas at Apra Heights
- Family housing / community support areas at Nimitz Hill
- NBG Munition Site (NBGMS)
- Naval Hospital and Guam High School

Appendix A provides an overview and relative locations of each existing facilities covered under the MS4 permit. Detailed map of NBG's storm water conveyance system will be continuously updated and incorporated into Storm Water Management Plan (SWMP) document.

1.3 Report Contents and Organization

This report follows the organization and requirements outline of the MS4 permit. This will aid Program Managers, Regulators and other stakeholders in the performance of the review process and tracking of multiple compliance activities. Future permit year reports will follow the presentation and organization of the approved SWMP document.

This annual report includes details of NBG compliance efforts, from February 1, 2023 to January 31, 2024, to meet permit conditions; various best management practices, existing inspection, reporting, and record keeping requirements for program activities to meet minimum control measures; current good-housekeeping contracts that provide street sweeping and stormwater conveyance maintenance activities.

A description of SWMP and permit compliance related activities planned for the future year program implementation is also included in this report. *However, these planned activities are based on the MS4 permit minimum requirements and may be changed, updated or replaced depending on the specific required activities in the SWMP.* Past compliance activities are also provided, where applicable.

This 5th annual report does not provide comprehensive information regarding the MS4 program effectiveness evaluation. The effectiveness evaluation requires data derived from actual stormwater management program implementation and MS4 outfall sampling and analytical results. The contract to implement MS4 program effectiveness evaluation was awarded to the Environmental Compliance IDIQ contractor however, the NBG comprehensive information will be included in future MS4 annual reports.

1.4 Schedules, Deadlines and Permit Modification Request

Requirement due dates (Appendix B) referenced in this report are based on the summary of deadlines describe in Table 4, Part 5.5 of the modified MS4 permit. NBG submitted a permit modification request to US EPA regarding permit implementation schedule citing difficulty in securing funding for emergent compliance program, logistic challenges in the acquisition of a MS4 SWMP development project and MS4 compliance program implementation.

On April 6, 2020, US EPA issued the final modified National Pollutant Discharge Elimination System (NPDES) permit for discharges from municipal separate storm sewer systems (MS4s) serving certain NBG facilities for one year. The discharges regulated by the permit consist primarily of stormwater runoff but could also include certain specified non-stormwater discharges. The effective date of the modified permit is May 1, 2020 and will expire on January 24, 2024 which is the same as the original permit issued in 2018.

1.5 NBG MS4 Program Contact Information

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Section 2 MS4 MANAGEMENT PROGRAM

2.1 General Requirements

The MS4 permit requires NBG to develop and implement a Stormwater Management Plan (SWMP) that outlines how the Installation will comply with the MS4 permit conditions. The SWMP document will aim to address the following requirements:

- Identify and implement Best Management Practices (BMPs) for all appropriate minimum control measures (MCMs) designed to reduce the discharge of pollutants from MS4 to the maximum extent possible (MEP), to protect water quality and to satisfy water quality requirements of the CWA and the Guam water quality standards.
- Identify measurable goals and milestones for BMPs, MCMs and other control measures.
- Provide planning and guidance documents to be used by military personnel, civilian staff, contractors, and members of the general public at NBG facilities who have the authority to access the base and outlying areas.
- Develop an implementation schedule and monitoring program to determine effectiveness of the control measures.
- Identify and assess existing policies for adequacy in the implementation of the MS4 permit conditions and SWMP document requirements.
- Develop and implement an enforcement response plan.

2.2 Stormwater Management Plan Development Project

The SWMP document was completed and submitted in accordance with the schedule and deadline provided in Appendix B.

NBG MS4 Program Managers will identify all SWMP-based compliance activity requirements and will develop a list of deliverables for future MS4 program implementation contract. An Independent Government Estimate (IGE) will be developed for each deliverable and a funding request will be submitted through channels.

2.2.1 Adequate Legal Authority Requirement

The Department of Navy (DON) environmental readiness program OPNAVISNT 5090.1E, the NBG Environmental Policy Statement (Appendix C), Executive Order 13514, and other DoD environmental policies such as the Low Impact Development (LID) are already in place in lieu of ordinances and other regulatory mechanisms required to implement an effective stormwater management program. As a non-traditional MS4, NBG's Installation Commanding Officer (ICO) has the authority to issue additional policies and memoranda to implement the SWMP requirements and to require all base tenants to comply with general provisions of the MS4

permit.

NBG MS4 Program Managers will identify the SWMP-based compliance activity requirements and will review existing policies to verify if the Installation meet the "adequate legal authority" requirements to control pollutant discharges as specified in Section 2.3 of the permit.

A statement from the Installation's Legal Counsel certifying the adequacy of NBG's legal authority to implement permit requirements will be included as part of the SWMP document and in accordance with the schedule provided in Appendix B.

2.2.2 Enforcement Response Plan

The Enforcement Response Plan (ERP) document describes a set of enforcement measures to which NBG is committed to in order to achieve and maintain compliance with the permit and the SWMP.

Due to the nature and operational structure of NBG, the most effective means for enforcement is escalation of unaddressed violations to the next higher authority. All violations and corrective measures will be tracked and recorded in a manner consistent with the procedures described in the ERP / SWMP and the MS4 permit requirements.

2.2.3 Fiscal Analysis

Conventional annual fiscal analysis (Appendix D) is not applicable to NBG as it is unique from most traditional MS4s in that it owns the property and almost all the facilities. The Installation also provides funding for majority of work on grounds and facilities located within its boundaries. Program implementation funding will be requested based on the IGE for each compliance activity deliverables specified in the SWMP document and the MS4 asset maintenance cost.

Chapter 2 of the OPNAVINST 5090.1E provides implementing policy guidance identifying and programming resources for environmental shore compliance. NBG SWMP/ MS4 Program Managers are responsible for identifying requirements and request for necessary funding to comply with the MS4 permit and the SWMP requirements. Funding may come from one or all three appropriations (O&M, OPN, RDT&E) as describe in section 2-3.4 of OPNAVINST 5090.1E.

MS4 Program Management Past Year Activities:

- NBG / NFM identified permit-based compliance activity requirements and has continued consolidating for the 5th Year NBG MS4 Annual report.
- Modified the Environmental Compliance IDIQ Contract, N40192-21-D-1820 to include NBG MS4 program implementation.

MS4 Program Management Future Year Activities:

- Identify SWMP-based compliance activity requirement and review existing Installation policy to determine adequacy to implement stormwater pollution

control measure. Develop and implement additional stormwater pollution control policies if necessary.

- Review and identify SWMP-based list of requirements and contract deliverable for future Environmental Compliance or an alternative MS4 compliance contract.
- Develop a SWMP-based IGE for remaining deliverables and submit a request for funding for MS4 compliance program implementation based on the IGE.

Section 3 MINIMUM CONTROL MEASURES

The NBG MS4 permit requires the Installation to provide a SWMP that will describe the six (6) Minimum Control Measures (MCMs) and details on the development and implementation of these measures required to qualify the Installation for permit coverage. The six MCMs are:

- MCM 1 - Public Education and Outreach,
- MCM 2 - Public Involvement / Participation,
- MCM 3 - Illicit Discharge Detection and Elimination (IDDE),
- MCM 4 - Construction Stormwater Run-off Control,
- MCM 5 - Post-Construction Stormwater Management and,
- MCM 6 - Pollution Prevention / Good Housekeeping for Base Operation.

3.1 Public Education and Outreach

Pursuant to Section 3.1 of the MS4 general permit requirements, NBG will focus on the development and implementation of a base-wide public education and outreach awareness program designed to inform base personnel's, tenants, school children, contractors, and the visiting community about the impacts that stormwater discharges could have on local waterbodies. The program will involve development and distribution of informational materials and conducting outreach activities aimed at enhancement of awareness and providing knowledge to NBG's target audiences about their activities that may have potential adverse effect(s) to water quality so that they can avoid these activities and thereby improve overall water quality.

Knowledge of the program will garner greater public support, as well as a more willingness to change their attitudes and comply with the BMPs set forth in the program.

3.1.1 Electronic Media Outreach

Electronic media outreach activity was performed during this reporting period. Detailed outreach procedure description is included in the SWMP document. The Installation utilizes one or a combination of the following NBG and Joint Region Marianas (JRM) webpages as an additional platform for reaching out to key audiences:

- <https://www.cnic.navy.mil/Guam/>
- http://www.cnic.navy.mil/regions/jrm/installations/navbase_guam/
- <https://www.facebook.com/USNavalBaseGuam/>
- <https://www.facebook.com/jrmguam/>
- <https://jrm.cnic.navy.mil/installations/NAVBASE-Guam/About/Departments/Environmental>

These webpages are accessible to the public and to tenants that may have trouble accessing

websites that are restricted by the Navy for operational security (OPSEC) reasons.

Pertinent MS4 documents such as educational materials aimed at residents and commercial tenants, such as good housekeeping practices, disposal of household hazardous wastes, the NBG MS4 Modified Permit and SWMP Revision Final, and NBG policies addressing stormwater pollution prevention are posted on these websites.

Past Year Activities:

- Contract was awarded to the Environmental Compliance IDIQ Contractor to assist in implementing minimum control measures required to meet NBG's permit requirements.
- Posted the most recent MS4 Annual Report, NBG SWMP Revision Final, NBG Modified MS4 permit, and any other applicable information to MS4 on the NBG and JRM websites.
- Created MS4 Stormwater Management Program page on NBG JRM website
 - <https://jrm.cnmc.navy.mil/Installations/NAVBASE-Guam/About/Departments/Environmental/MS4-Storm-Water-Management-Program/>
- Posted MS4 public participation activities and MS4 educational materials on NBG's social pages (i.e. Facebook)
- Incorporated MS4 environmental awareness information into the Welcome to Guam In-brief for new military personnel.

Future Year Activities:

- Continue to post MS4 public participation activities and MS4 educational materials on NBG's social media pages (i.e. Facebook)
- Track public comments and reactions to posted materials. Evaluate public input and update program if necessary
- Identify additional approaches and materials that can be circulated by electronic means.
- Continue to incorporate MS4 environmental awareness information into the Welcome to Guam In-brief for new military personnel.
- Continue to update the base websites with new stormwater management information semi-annually.

3.1.2 Stormwater Pollution Prevention Training

NBG has an existing Spill Prevention Control and Countermeasure (SPCC), Stormwater Management Program (SWMP) and Stormwater Pollution Prevention (SWP2) annual training and refresher program in compliance with the Multi-Sector General Permit (MSGP) and Municipal Storm Sewer System (MS4) requirements. The Installation's SPCC, SWMP and SWP2 training programs are being implemented as part of the Environmental Compliance IDIQ

Contract, N40192-21-D-1820. Trainings are conducted at least annually to all personnel working in industrial / commercial facilities within the NBG MS4 permit area (Appendix E).

The NBG BOS contractor offers orientation program to their newly acquired personnel. Part of the orientation is to provide basic summary of NBG's environmental policies including stormwater pollution prevention. However, the new hire orientation activities are not currently being tracked and not part of the contractor's deliverables. The number of sessions and the quantity of attendees are currently not recorded for the purpose of complying with the MCM1. This program could be enhanced and tracked to meet the MS4 MCM1 requirements and each session can be used as a venue for MS4 informational material distribution.

Past Year Activities:

- NBG implemented existing annual SPCC, MS4, and SWP2 training programs to educate base personnel, tenants, and contractors regarding stormwater pollution prevention.
- Revised NBG Environmental new hire / unit indoctrination presentation to include elements of the NBG MS4 MCM requirements.
- Modified existing Environmental Compliance contract or provided an alternate contract mechanism to include MS4 training program.
- The following quantities were taken from the Environmental Compliance IDIQ Contract, N40192-21-D-1820 Annual SPCC, MS4, and MSGP Training report. Trainings provided to facilities and personnel outside the NBG MS4 permit area are excluded from Table 1 below:

Table 1: CY2023 NBG Stormwater Training

Facility / Building No.:	Date	Number of Attendees
DLA Bldg. 631 Disposition Facility	11/16/2023	7
Transportation Maintenance Shop Bldg. 372	12/13/2023, 12/14/2023	90
Material Handling Equipment, Bldg. 364	11/16/2023	8
Transportation, Filling Station, Bldg. 374	12/14/2023, 12/15/2023	16
Alpha Compound Maintenance (Camp Covington)	12/07/2023, 12/08/2023	7
Seal Compound (Bldg. 3000-3008)	12/15/2023	17
Port Operations, Bldg. 3169	11/07/2023, 11/15/2023, 11/17/2023, 11/28/2023, 12/12/2023	42
Marina Facilities, Bldg. 5406	12/22/2023	2
PACSEA Bldg.	12/11/2023	26
Navy Berthing Facilities	*	*
Emergent Repair Facilities, Bldg. 4430	12/05/2023, 12/08/2023	36

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AHWWTP, Bldg. 1794 1604	12/13/2023	18
Utilities and Machine Shop, Bldg. 1793	*	*
US Navy Sanitary Landfill	12/05/2023, 12/14/2023	19
Naval Hospital Compound	*	*
U.S. Navy Water Treatment Plant	12/14/2023	9
U.S. Navy Laboratory	08/31/2023	3
MWR Auto Hobby Shop	12/01/2023	1
USCG Apra Harbor	12/11/2023	10
USCG	11/29/2023	4
Ordnance Annex	12/12/2023	65
Kilo Wharf Compound 1802-1803	12/12/2023	17
Port Operations (Annex 0600)	11/07/2023	14
Total Number of Personnel Trained:		408

Source: Environmental Compliance IDIQ N40192-21-D-1820

Notes: * Annual training not conducted

Future Year Activities:

- Continue implementation of existing SPCC, MS4, and SWP2 training programs and identify additional facilities / personnel that require training under the MS4 program.
- Modify / improve existing SPCC and SWP2 training materials to include MS4 permit and SWMP requirements.
- Continue to modify / improve the Government and Contractor new-hire orientation and personnel indoctrination programs to include MS4 permit and SWMP requirements as needed. Document the number of orientations provided during each compliance year.
- Evaluate effectiveness of the SPCC and SWP2 training programs. Previous evaluations were performed in accordance with MSGP requirements.

3.1.3 Informational Materials

Informational materials have been created and are geared towards the general population that work and live on the base with the intent of providing general stormwater knowledge and pollution awareness.

The Installation will continue to work with offices of Personnel Management (OPM) and NBG Housing to include MS4 topics and informational materials distribution during the mandatory indoctrination briefing for NBG new arrivals (military and civilian). Newcomers will be informed of the illicit discharge reporting procedures and will be encouraged to participate in MS4 related activities (storm drain clean-up and labelling).

Environmental Compliance IDIQ contractor and other contractors will also be tasked to distribute MS4 informational materials and to review and update their environmental presentation materials during the Contractor's new-hire orientation.

Past Year Activities:

- Distribution of MS4 informational materials was not conducted this reporting period, however, MS4 educational materials are posted on the Joint Region Marianas (JRM) webpage and is openly accessible to the general public. Reporting of distribution of informational materials will be included in the following annual report.

Future Year Activities:

- NBG will distribute sufficient copies of educational materials to a minimum of 20% of the target audiences and track this distribution each compliance year. Tracking of distribution, at a minimum, should include topic and quantity distributed to target audiences.
- Develop educational materials such as posters, designed specifically for school children and posting at school premises. Track quantity and variety of material posted.
- Continue to distribute copies of stormwater educational materials to construction site operators and track this distribution each compliance year.
- Continue production of informational materials and develop new ones that target specific sectors such as housing tenants and school children.
- Identify additional venues and events (e.g. World Earth Day) for the distribution of informational materials. Identify additional means of materials dissemination.
- Create new educational materials if needed and update existing informational materials based on effectiveness assessment.
- If deemed necessary based on program effectiveness assessment, NBG will produce a spot to run on the "The Joint Military News Network (JMNN) and JRM YouTube Channel.
- Modify existing Environmental Compliance contract or provide an alternate contract mechanism to include MS4 distribution and tracking of MS4 informational materials.
- Contract was awarded to Environmental Compliance IDIQ contractor to facilitate the activities above and will occur in the next reporting period.

3.1.4 Survey

The design of a statistically valid survey is part of the SWMP development contract and is not required during this reporting period. Surveys to assess changes in public awareness and behavior resulting from implementation of the public outreach program within four (4) years

from the effective date of the permit (EDOP). Overall program implementation will be conducted in accordance with the schedules and deadlines outlined in Appendix B.

Past Year Activities:

- Design and development of a statistically valid survey is included in the SWMP document, however, a survey program to assess changes in public awareness and behavior resulting from the implementation of the public outreach program is pending.
- Contract was awarded to the Environmental Compliance IDIQ contractor to conduct the baseline survey to gauge existing level of public awareness and behavior and will occur in the next reporting period.

Future Year Activities:

- NBG shall conduct follow-up survey within two (2) years of public education and outreach program implementation to assess changes in public awareness using the SWMP statistically valid survey procedure.
- Modify existing Environmental Compliance contract to include MS4 survey program.

3.2 Public Participation / Involvement

NBG will develop steps and procedures that will allow and encourage public participation in the overall compliance with the MS4 permit requirements. NBG will implement additional compliance measures that will encourage base tenant's participation in the development and implementation of this BMP, solicits tenants reporting of suspected illicit discharges and promotes active involvement in increasing stormwater pollution control awareness.

Proposed and interim BMPs for this MCM are describe below:

3.2.1 Public Review of NBG SWMP

NBG recognizes the importance in allowing the public to play an active role in the development and implementation of the SWMP. An active and involved community will help develop a large public support base for the program including a broader base of expertise and allow for shorter implementation schedules due to fewer obstacles in the form of public challenges.

NBG made available a copy of the SWMP document on these following webpages this reporting period:

- <https://www.cnic.navy.mil/Guam>
- <https://irm.cnic.navy.mil/installations/NAVBASE-Guam/About/Departments/Environmental>

Past Year Activities:

- Not applicable / required during this reporting period. NBG made available the MS4 SWMP for public review and comment for 30 days on the Commander Navy Installation Command Notification (CNIC) website in July 2021. No comments or feedbacks were received from the community.

Future Year Activities:

- NBG Environmental will work with CNIC to continue to post the SWMP document and annual report along with contact information for public review and comment on the website listed below:
 - <https://www.cnic.navy.mil/Guam/>
 - http://www.cnic.navy.mil/regions/irm/installations/navbase_guam/
 - <https://irm.cnic.navy.mil/installations/NAVBASE-Guam/About/Departments/Environmental>
- Provide point of contact for receiving proposed changes and revisions of the MS4 SWMP.

3.2.2 Public Participation Campaign

NBG personnel have been participating in various community clean-up events, working with members of the community to clean up trash, green waste, and debris to help keep pollutants from entering the receiving waters.

NBG plans to coordinate and improve existing programs by working with Community Relation (COMREL) personnel of various NBG tenants / units in promoting public awareness about the impacts of trash and illicit discharges on storm water runoff quality. COMREL activities may include but not limited to trash pick-up, beach clean-ups, and storm drain marking.

Past Year Activities:

- Sailors from NBG and various tenant commands volunteered for a clean-up at the historic Sumay Cemetery on November 01, 2023. Volunteers cleared the cemetery of leaves and debris.
- Volunteer Sailors from NBG and Naval Airborne Weapons Maintenance Unit One, participated in a clean-up at Southern High School in Santa Rita-Sumay on June 29th, 2023.
- Sailors from visiting USS Rafael Peralta (DDG 115) partnered with the Piti Mayor's Office for painting and clean up at Pedro Santos Park in Piti on March 10th, 2023.
- Contract awarded to Environmental Compliance IDIQ contractor to facilitate local environmental related community outreach events such as active presentation at NBG schools, set up of informational kiosk for Earth Day, providing mechanisms for NBG tenants to participate in the design and development of NBG stormwater slogan and logo.

Future Year Activities:

- Provide mechanisms for various NBG sectors / units to perform COMREL activities such as streets and beach clean-ups within or outside NBG's permitted area.
- NBG will participate in local environmental related community outreach events by active presentation or setting up information Kiosk. Identify and establish a list of possible partnership with local organization to widen opportunities for public outreach.
- Participate in World Earth Day and / or other similar events.
- Develop inventory of storm drain marking activities by establishing partnership with COMREL personnel of various NBG tenants to promote stormwater pollution awareness and discourage illicit discharges.
- Provide a mechanism for NBG tenants to participate in the design and development of NBG stormwater slogan and logo.
- Coordinate with DoDEA and facilitate a slogan / logo design contest for elementary and high school students.
- Contract was awarded to Environmental Compliance IDIQ contractor to facilitate the activities above and will occur in the next reporting period.

3.3 Illicit Discharge Detection and Elimination (IDDE)

NBG will identify and eliminate sources of illicit discharges by investigating and eliminating non-stormwater discharges, including illegal dumping. This program will include developing BMPs and establishing measurable goals to eliminate illicit discharges into its MS4 in accordance with the general permit requirements. The following are interim BMPs that outlines NBG's procedures in addressing illicit discharges.

3.3.1 NBG MS4 Map

NBG will update and maintain accurate and up-to-date Geographic Information System (GIS)-based storm sewer system map of the MS4 permitted areas of NBG. These maps will include and identify all key elements of NBG MS4 stormwater inlets, outfalls, and BMP locations as wells as commercial and industrial facilities. Field inspectors and laboratory sampling personnel will reference these elements during field screening and sampling.

Past Year Activities:

- NBG generated a concise, field friendly map for each permitted area for a total of five (5) maps on September 13, 2023.

Future Year Activities:

- Continue to update MS4 field map when necessary. The map should include the following locations: BMP locations, industrial / commercial facilities, stormwater inlets and outfalls. Consolidate updates during the annual SWMP review.

3.3.2 Identification of Priority Outfall

Based on the information collected from the MS4 mapping activities, NBG will generate an inventory of all outfalls within the permit area. NBG will conduct an evaluation and develop a list of priority area identified as having a higher potential of illicit discharges / connections and illegal dumping based on the following criteria:

- Areas with older infrastructure
- Industrial, commercial, or mixed-use areas
- Location's history of previous illicit discharges / connections
- Location's history of sewer overflows
- Areas upstream of sensitive waterbodies and locations that may discharge pollutants of significant quantities to the waters of the U.S.

Past Year Activities:

- Not applicable / required during this reporting period. A list of seven priority outfalls for the MS4 program was submitted and approved by Guam Environmental Protection Agency (GEPA).

Future Year Activities:

- Work with Guam EPA to select an alternate Priority Outfall for Outfall AP12. A natural spring located upgradient from the housing area flows continuously throughout the year and drains into outfall AP12.
- Review and update the priority outfall list when necessary to reflect changes in the MS4.
- Consolidate update requirements in the annual SWMP review.

3.3.3 Dry Weather Field Screening

NBG has developed a dry weather field screening / Outfall Reconnaissance Inventory (ORI) program to ensure that priority outfalls are visited at least annually for dry weather field

screening. Samples will be collected and analyzed when flow or ponded runoff is observed and there has been 72 hours of dry weather (during the months of January to April), 48 hours of dry weather (during the months of May to July, and December), and 24 hours of dry weather during the months of August and November. Sample collected will be tested for indicators listed on Table 2 below. Samples will be submitted to offsite laboratories with DMRQA program for analyses with the exception for pH which can be measured in-situ by trained personnel.

Table 2: Dry Weather Field Screening Benchmark

Indicator	Benchmark
Ammonia	> 50 mg/L
Conductivity	> 2000 uS/cm
Surfactants	> 0.25 mg/L
pH	< 6 or > 9 s.u.
Enterococcus (GeometricMean)	35 MPN/100 mL

In addition, a minimum of 20% of the total outfalls will also be subjected to dry weather screening on an annual basis. This is to ensure that all non-priority outfalls will be screened at least once during the permit term.

Past Year Activities:

- One hundred twenty (120) major outfalls were selected for the dry weather screening inspection to detect illicit, inappropriate, or non-documented non-stormwater discharges. Dry weather field screening was conducted at five (5) priority outfalls and thirty-seven (37) non-priority outfalls. No illicit discharges were observed during dry weather field screening (Appendix F).

Future Year Activities:

- Continue to complete dry weather field screening and outfall reconnaissance inventory inspections at 120 locations based on the SWMP schedule.
- Work with Guam EPA to select an alternate Priority Outfall site for priority outfall AP12 and non-priority outfall monitoring locations Trans1, AP8, XR1, ST6, OsPa1, Ecov1, and Inn1. MS4 outfalls are either not accessible or pose a safety hazard to sampling personnel due to its locations.
- Continue to provide training to weather field screening personnel.
- Perform corrective actions and / or propose preventative measures, when necessary, for dry weather field screening /ORI findings.

3.3.4 Illicit Discharge Public Reporting

The Illicit Discharge Reporting program development is part of the SWMP document contract. Implementation of this program is not due to begin during this reporting period.

NBG has an existing hazardous substance and sewer spill reporting and response program as part of the Environmental Compliance and Hazardous Waste (HW) IDIQ Contracts. 24-hour emergency phone numbers are available for the following responsible contractors to respond:

- *Hazardous Substance Spill Response* - N40192-20-R-1800
- *Sewage Spill Response* - N40192-21-D-1820

In addition to the EV and HW IDIQ contractors spill response procedures, NBG has a standing instruction for oil and hazardous substance spill contingency and response that provide a flowchart for spill reporting and clean-up including points of contact and contact numbers:

- NAVBASEGUAMINST 5090.3 Series

These spill response programs and instructions may be enhanced to include reporting of illicit discharges to the Installation's MS4 conveyance system.

NBG recently completed the update of its Spill Prevention, Control and Countermeasure (SPCC) Plan and the accompanying Facility Response Plan. These plans help ensure that oil storage facilities are equipped with proper spill prevention and spill response tools, and a standing procedure for reporting spills is maintained. These plans help prevent petroleum-based pollutants in reaching NBG's storm sewer system.

NBG plans to build around and refine these programs to meet MS4 permit requirements. NBG will encourage base tenants to report the presence of illicit discharges, or water quality impacts associated with discharges from the MS4 including accidental spills.

Past Year Activities:

- NBG implemented existing reporting program for hazardous substances and sewage spills response. These programs help prevent pollutants from coming into contact with the stormwater conveyance system.

Future Year Activities:

- Evaluate the effectiveness of the existing spill reporting programs and instructions and determine if modification / expansion of the programs is necessary to prevent pollutants from reaching the MS4 conveyance system and nearby navigable waters.

3.3.5 IDDE Source Investigation and Elimination

The NBG IDDE source investigation and elimination program development is part of the SWMP document. This program outlines the procedures for detection of illicit discharges, conducting investigation for confirmed illicit discharges as well as the implementation of corrective actions to eliminate such discharges.

NBG currently implements a reporting program for non-stormwater discharges and spills as mentioned in Section 3.3.4 of this report. NBG plans to build around and implement this program in combination with the dry weather field screening/ORI BMP to meet the IDDE requirements of the permit.

The spill response procedures and instructions mentioned in the previous section requires the BOS contractor to mitigate and remove spilled media and prevent these contaminants from reaching the storm conveyance system. The following are quantities of shore-based spill and sewer overflow responses and mitigation performed during this reporting period:

Table 3: Summary of NBG CY2023 Spill Response Activities

Type of Response	Permit Area / Quantity				
	NBG Apra Harbor	Apra View / Palms	Nimitz Hill	NBG MS	Naval Hospital
HW/HS Spill	23	0	1	0	0
Sewer Spill	2	0	0	0	0

*Sources: Hazardous Substance Spill Response - N40192-20-R-1800
 Note: NBG MS - Naval Base Guam Munition Storage

These shore-based spills and sewer overflow responses and clean-ups are proven methods in water pollution prevention by not allowing contaminants to reach NBG's MS4 system and nearby navigable waters.

NBG and NFM have implemented an inter-departmental review program for the development and redevelopment of facilities. This review process comes standard to all projects and includes the review and approval of sewer line connections, thus ensuring separation of sewer line from the MS4 system.

Past Year Activities:

- May 15, 2023: Approximately fifty (50) gallons of sewage was discharged from the Collection Holding Tank (CHT) hose from USS Markin Island into the waters of Tango Wharf on May 15, 2023 at 1720H. The sewage spill was due to failure of proper flush/blowdown of the CHT hose prior to dropping hose onto Tango Wharf, T/CHT6. This caused residual sewage inside the hose to backflow onto the wharf. Annex 1604 wastewater operator immediately placed the CHT hose inside the berm of Tango Wharf to contain sewage. Sewage water inside the berm was then pumped out with a pump truck and the area was disinfected with sodium hypochlorite solution.

- May 24, 2023: A wastewater bypass event occurred at the Apra Harbor Wastewater Treatment Plant (AHHWTP) on May 24, 2023, at 1700 hours to May 26, 2023 at 1600 hours. The event was a result of the effects of Super Typhoon Mawar. Waste streams were intentionally diverted into a manhole at Victor Wharf, NBG, and was disinfected with sodium hypochlorite with a 1:1 gallon per hour feed rate prior to discharge into Apra Harbor.
- Implemented existing spill response and clean-up program for hazardous substances and sewage spills response.
- Implemented inter-departmental sewer connections review and approval process.

Future Year Activities:

- Continue implementation of inter-departmental review process for the development and redevelopment of NBG facilities.
- Continue to evaluate the effectiveness of the existing spill response procedures and instructions and determine if modification / expansion of the programs is necessary to prevent pollutants from reaching the MS4 conveyance system and nearby navigable waters.

3.4 Construction Site Runoff Control

The MS4 permit requires NBG to develop a Construction Site Storm Water Runoff Control program that will address how NBG will reduce pollutants in storm water runoff from construction activities that result from a land disturbance of greater than or equal to one acre. This program aims to:

- Standardized BMP implementation and erosion and sediments control requirements.
- Develop and maintain inventory of NBG's construction sites.
- Standardize construction plan review and approval process and promote incorporation of BMPs as part of the early planning stage of the project design.
- Establish routine construction site inspection procedures.
- Identify training requirements.
- Promotes construction operator's awareness and encourage public involvement.

3.4.1 Construction Stormwater Management Policy

NBG has adopted the 2014 NPDES Comprehensive Construction Stormwater Pollution Prevention Plan for the Guam Military Relocation DPRI Construction Program. A memorandum

was issued by the NBG Public Works Director (PWD) to the Director of the Facilities Engineering and Acquisition Division (FEAD) to ensure that the construction requirements of the MS4 permit are met and will require contractors to select, install, implement, and maintain stormwater control measures (Appendix H).

NBG will apply this program to all construction projects within the permitted area, which include both public and private maintenance contract and construction projects with total land disturbance of one or more acres or that result in a total land disturbance of less than one acre if part of a larger common plan or development or sale.

Past Year Activities:

- FEAD adopted the 2014 DPRI Comprehensive SWPPP issued by the Installation Commanding Officer.
- Implemented construction site SWPPP review process and stormwater runoff control measures in accordance with the 2014 DPRI CSWPPP.

Future Year Activities:

- Continue to implement construction site SWPPP review process and stormwater runoff control measures in accordance with the 2014 DPRI CSWPPP.
- Continue to provide a presentation and conduct an awareness training with FEAD personnel (ET's and CME's)
- Continue to conduct regular meeting / communication with FEAD regarding regular inspections of storm water runoff control measures at construction sites.

3.4.2 Construction Site Inventory

NBG has an existing electronic tracking system that includes a list of all active private and public construction sites. The tracking system for site that are at least an acre in total disturbed land is currently in use. Final format of the construction site tracker will be developed based on the specific description of the SWMP document.

There are currently three (3) construction site projects that disturbs land greater than 1 acre in total area. All pertinent construction site project information is provided in Appendix I.

Past Year Activities:

- Lima Wharf repair is currently on-going. Project entails repairing and modernization of Lima Wharf and associated facilities.
- P-699 1MW Solar Array Project is currently on-going. Project intended to support the Apra Harbor Wastewater Treatment Plant.

- P-519 X-Ray Wharf repair is currently on-going. Project entails renovation and modernization of the south berth or Berth 2 at X-ray Wharf.

Future Year Activities:

- FEAD will continue to maintain an inventory of all construction site projects that result in a total land disturbance of one or more acres using an electronic tracking system (eprojects).
- Continue to document and report the number of active and new construction site projects operating under erosion and sedimentation control requirements of the 2014 DPRI CSWPPP.

3.4.3 Construction Plan Review Procedure

Development of the NBG construction plan review procedure is part of the SWMP document.

There are currently three (3) construction site projects that disturbs lands greater than 1 acre in total area. Construction plan review process were conducted consistent with the Construction General Permit (CGP) requirements. The review process documentation may not be consistent with all 2014 DPRI CSWPPP requirements. All pertinent construction plan review information is provided in Appendix B. Project progress will continue to be documented and will be included in the next reporting period annual report.

Past Year Activities:

- Performed EV and Utilities stormwater compliance inspections on three (3) construction projects within NBG with >1 acre of total land disturbance.

Future Year Activities:

- NBG will continue to implement construction plan and SWPPP review process for development / redevelopment project with 1 acre or more total land disturbance in accordance with the 2014 DPRI CSWPPP / NBG MS4 SWMP.
- Continue implementation of inter-departmental review process to ensure compliance with site runoff control and Section 401 certification requirements as describe in the special condition section of the MS4 permit.
- Distribute the 2014 DPRI CSWPPP and the NBG MS4 Permit to FEAD construction plan reviewers when necessary.

3.4.4 Construction Site Inspection

There are currently three (3) construction site projects that disturbs lands greater than 1 acre in total area. Initial inspection conducted were consistent with CGP requirements, and consistent

with the MS4 permit / 2014 DPRI CWSPPP requirements. A summary of CY 2023 construction site inspections is provided in Table 4 below:

Table 4: Summary of Construction Site Inspections

Project Site	Inspection Date CY2023			
	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter
P-669 1MW Solar Array*	-	06/15/23	09/28/23	12/26/23
Lima Wharf Repair*	03/22/23	06/27/23	09/27/23	12/27/23
P-519 X-Ray Wharf Repair*	-	06/13/23	09/27/23	12/27/23

Notes: * On-going DPRI projects

Past Year Activities:

- A total of ten (10) quarterly Construction Site inspections were conducted in CY2023. Findings and non-conformances were forwarded to NBG and ROICC for corrective action and enforcement.

Future Year Activities:

- Continue to conduct construction site BMP inspections for qualified active construction sites in accordance with MS4 Permit and DPRI CWSPPP requirements. Provide an inspection summary report including findings and non-conformances.
- NBG will continue to collect stormwater runoff control measure inspection data from applicable project sites and update the construction site inventory/inspection tracker when new data becomes available.
- Develop a regular scheduled meeting / engagement between NBG MS4 Program Management team, FEAD and MCBCB CMEs / ETs.
- Evaluate effectiveness of the construction site inspections program in preventing construction related pollutants from reaching the MS4 conveyance system.

3.4.5 Permittee Staff Training

NBG will implement a training program for its staff whose primary duties are related to implementing the construction stormwater program. Training program will include information regarding BMPs, pollution prevention, and other stormwater related information.

Past Year Activities:

- Updated Environmental Compliance Contract to include Construction Site inspection. Contractor inspectors will be required, at a minimum, to complete the AFIT WESS 031 training and / or USEPA Construction Site inspection course.
- Five (5) personnel from Environmental Compliance IDIQ contractor completed the USEPA Construction Site Inspection Course in 2023.

Future Year Activities:

- NBG will continue to coordinate with FEAD and MCBCB CME Supervisor to ensure CMEs and ETs are provided training required to perform stormwater runoff control measures inspection and review.
- Survey FEAD for construction site stormwater runoff control measure inspection and SWPPP review training and,
- Assist CME Supervisors identify training opportunity for CMEs and ETs.
- Evaluate effectiveness of the construction site inspections training program in preventing construction related pollutants from reaching the MS4 conveyance system.

3.4.6 Construction Site Operator Education & Public Involvement

The NBG construction site operator education and public involvement program will be implemented in conjunction with the MCM 1 and MCM 2. MS4 permit compliance activities for this BMP requirements are described under MCM 1 and MCM 2 of this report.

Past Year Activities:

- Contract was awarded to Environmental Compliance IDIQ contractor however; distribution of construction site informational materials was not conducted during this reporting period. Informational materials will be distributed to all construction site workers next reporting period.

Future Year Activities:

- Distribute and track informational materials to construction site workers. Distribution will be conducted on new or on-going construction site or when new informational materials have been developed. Informational materials distribution should include variety and quantity distributed.
- Modify the Environmental Compliance IDIQ to manage and track the distribution of MS4 informational materials.

3.5 Post-Construction Stormwater Management

NBG will develop, implement, and enforce a program to address post-construction storm water runoff from new development and redevelopment projects LAW the 2006 CNMI and Guam Stormwater Management Manual and 2010 Guam Transportation Stormwater Drainage Manual.

In addition to the BMP measures required during construction, the CGP conditions require owners, operators and contractors to provide post-construction BMP measures in areas undergoing new development or redevelopment. This program involves multiple components for reporting and describe in the following subsections.

3.5.1 Post-Construction Stormwater Management Policy

NBG has adopted the 2014 DPRI CSWPPP acceptable post construction BMPs. The memorandum was issued by the NBG PWD to the FEAD Director to ensure that the post-construction requirements of the MS4 permit are met (Appendix F). As a non-traditional MS4, this memorandum will suffice the requirement of developing an ordinance / regulation for post construction stormwater management.

NBG will apply this program to ensure that site performance standards are met in all Installation's construction projects, which include both public and private maintenance contract and construction projects.

Past Year Activities:

- FEAD adopted the 2014 DPRI Comprehensive SWPPP including the specified acceptable post-construction BMPs.

Future Year Activities:

- Continue program implementation of inter-department review and as-built submittal requirements to ensure compliance with the site performance standard requirements.
- Continue to update and maintain a Navy-wide standardized inventory of stormwater assets. Stormwater assets will be managed under INFADS.

3.5.2 Site Plan Review

Written procedures for this BMP are included in the SWMP document. Full implementation during this permit compliance period is in accordance with the permit schedule. NBG adopted the 2014 DPRI CSWPPP inter-department consultation for site plan review and approval procedure.

An as-built certification submittals are already required for all NBG construction projects.

Past Year Activities:

- Implemented standard inter-departmental review process for two (2) completed construction project; however, as-built certifications for the two projects are pending approval.

Future Year Activities:

- Continue program implementation of inter-departmental review and as- built submittal requirements. Document "As-built" drawings and certifications and verify performance.
- Continue to implement the review of plans for post-construction BMP procedure as described in the SWMP document.

3.5.3 Long-Term Maintenance of Post-Construction BMPs

Development of the NBG long-term post-construction BMPs maintenance program is included in the SWMP document.

NBG may adopt and implement the requirements describe on Section 3.6.7 of the permit where the Installation is required to conduct a minimum of annual inspection on all structural storm water controls. Maintenance will be provided based on the inspection report recommendations.

Past Year Activities:

- All three (3) construction site projects are currently on-going; no post-construction BMPs inspection conducted. Active construction BMP inspection contracted to Environmental Compliance IDIQ contractor.

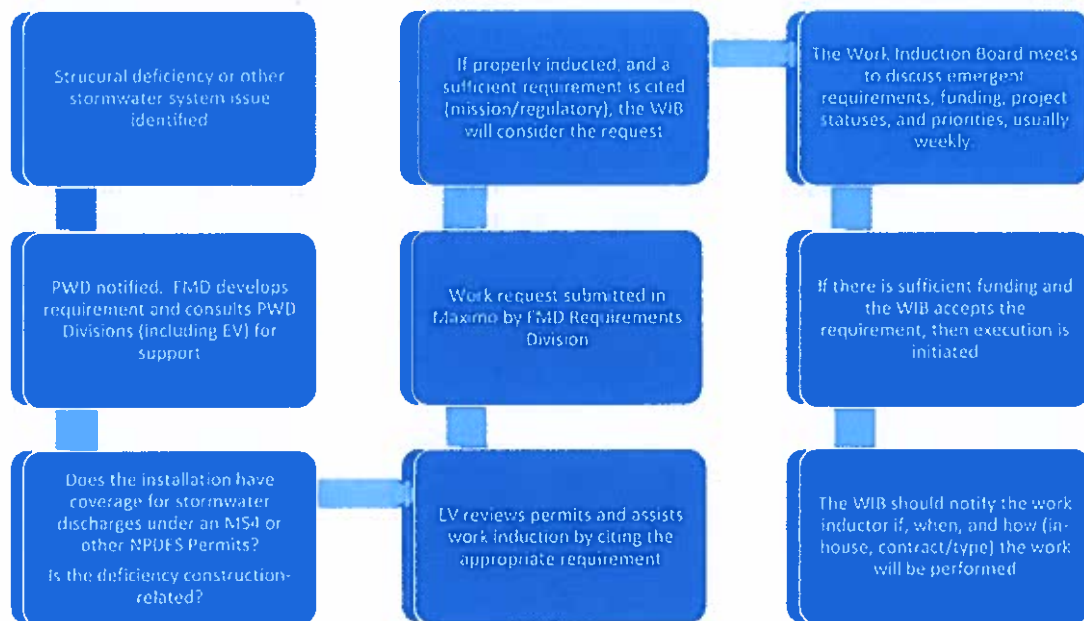
Future Year Activities:

- Continue to implement the post-construction BMP operations and maintenance program as describe in the SWMP document.
- Document and report number and description of maintenance, repairs, and retrofit performed.

3.5.4 Post-Construction Stormwater Control Measures Inventory and Maintenance

An Asset Management System (AMS) or an equivalent program has been implemented by FEAD to track inspections and maintenance of permanent post-construction BMPs. It is important that plans be made for long-term operation and maintenance of permanent post-construction BMPs because if maintenance is inadequate or ceases the BMPs not work as originally intended. BMP's that are not working as designed may become a source of pollution.

Figure 1: NAVFAC General Stormwater Management Flowchart



Past Year Activities

- Post-construction BMP operation and maintenance and inspection database program description is currently being tracked by FEAD.
- NBG as a whole is in the process of standardization of BMP classification and developing CCNs for INFADS for sustainment purposes.

Future Year Activities:

- Continue to implement the post-construction BMP operations and maintenance program as describe in the SWMP document.
- Continue to update and maintain a Navy-wide standardized inventory of stormwater assets. Stormwater assets will be managed under INFADS.

3.5.5 Inspection and Enforcement

NBG has adopted the inspection schedule provided in Section 3.6.7 of the permit or based on the inspection program description that is in the completed SWMP document. Inspection report will include recommendations for improvements and/or repairs to ensure compliance with regulatory requirements and conformance with Navy and DoD policies.

NBG has also adopted the draft Naval Facilities (NAVFAC) general stormwater management inspection and maintenance flowchart (Figure 1) to ensure the physical integrity of NBG's storm sewer system and compliance with the MS4 permit requirements.

Formal implementation of the post-construction stormwater control measures inspection program was executed this reporting period.

Past Year Activities:

- Post-construction BMP operation and maintenance and inspection database program description is currently being tracked by NBG to ensure that the physical integrity of NBG's storm water sewer system is in compliance with the MS4 permit.

Future Year Activities:

- Continue to implement the post-construction BMP operations and maintenance program as described in the completed SWMP document in conjunction with existing NAVFAC processes related to stormwater management (see Figure 1).

3.6 Pollution Prevention / Good Housekeeping Program

NBG will develop and implement an operation and maintenance program that aims to prevent and reduce pollutant run-off into the storm drainage system in accordance with the MS4 permit requirements. Written procedures for the program implementation are part of the SWMP document.

3.6.1 Facility Assessment and "High Priority" Facilities Stormwater Controls Program

Development and mapping of facility stormwater control inventory is included in the SWMP document. At a minimum, stormwater control inspections will be conducted based on the schedule specified in Section 3.7.4 of the permit.

Assessment and inspection procedures for "High Priority" facilities has been incorporated in the SWMP document including identification of facilities that are subjected to weekly visual and quarterly comprehensive inspections.

Routine facility inspections are currently conducted by the Installation's HAZWASTE and Environmental Compliance IDIQ contractor in accordance with the RCRA and MSGP SPCC/SWPPP requirements. NBG plans to build upon and refine these procedures to meet the MS4 permit requirements. Inspections conducted during this reporting period is provided in Table 5 below:

Table 5: CY 2023 MSGP Facility Inventory and Routine Inspection

Facility ID	Date Inspected			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
DLA (Formerly DRMO) Bldg. 631 Disposition Services Guam	3/1/2023	6/20/2023	9/15/2023	12/27/2023
Transportation Maintenance Shop, Bldg. 372	3/6/2023	5/31/2023	8/18/2023	11/2/2023
Material Handling Equipment, Bldg. 364	3/6/2023	6/22/2023	8/18/2023	12/29/2023
Filling Station, Bldg. 374	3/6/2023	5/31/2023	8/18/2023	11/2/2023
Alpha Compound, Camp Covington, Bldg. 557 A-C, 561, 562, 563, 571, & 578	3/14/2023	6/26/2023	9/11/2023	11/2/2023
SEAL Compound 3000-3002, 3008	3/9/2023	6/16/2023	8/31/2023	11/16/2023
Port Operations, Bldg. 3169	3/13/2023	6/12/2023	8/22/2023	11/16/2023
Kilo Wharf Compound 1802-1803	3/13/2023	6/12/2023	8/22/2023	11/16/2023
Marina Facilities, Bldg. 5406	3/6/2023	6/22/2023	8/18/2023	12/29/2023
PACSEA Bldg. 3169	3/13/2023	6/12/2023	8/22/2023	11/16/2023
Navy Berthing Facilities: Bravo, Echo, Romeo, Sierra, Victor)	3/13/2023	6/12/2023	8/22/2023	11/16/2023
US Coast Guard Station, Apra Harbor	3/06/2023	6/20/2023	8/22/2023	11/16/2023
US Coast Guard, Guam Sector Bldg. 3, 3A, K-Span	3/06/2023	6/20/2023	9/12/2023	11/17/2023
Emergent Repair Facility, Bldg. 4430, Site III	3/8/2023	6/22/2023	09/13/2023	11/28/2023
Apra Harbor Wastewater Treatment Plant, Bldg. 1794-1809	03/09/2023	06/29/2023	09/11/2023	11/16/2023
Bldg. 1793 A/B Utilities & Machine Shop	03/09/2023	04/12/2023	09/11/2023	11/08/2023
US Navy Sanitary Landfill	03/06/2023	05/22/2023	08/18/2023	11/16/2023
Seabee's Asphalt Batch Plant	01/31/2023	06/23/2023	09/14/2023	11/02/2023
Fleet Logistic Center Yokosuka, Guam Storage Tanks S-1 to S-5	03/01/2023	05/31/2023	08/02/2023	11/15/2023
Fleet Logistic Center Yokosuka, Guam Oil & Wastewater Storage Tanks L-1 and H-2	03/01/2023	05/31/2023	08/02/2023	11/15/2023
Fleet Logistic Center Yokosuka, Guam Field Maintenance Shop Bldg. 1704	03/01/2023	05/31/2023	08/02/2023	11/15/2023
Fleet Logistic Center Yokosuka, Guam Sludge Storage Tanks ST-32	03/01/2023	05/31/2023	08/02/2023	11/15/2023

Source: Environmental Compliance IDIQ N40192-21-D-1820 - MSGP Facility Inspection Report

Eighteen (18) facilities located within the MS4 permitted area were visited at least once per quarter for good housekeeping and industrial outfall inspection. A total of seventy – two (72) inspections were conducted during this reporting period. Table 6 below provides a summary of the CY2023 inspection findings:

Table 6: CY2023 Inspection Summary

Inspection Period	Findings / Deficiency	Inspection Comments
1 st Quarter	Fourteen (14) Housekeeping/ BMPs	Inspection report provided to NBG EV IEPD for immediate action. Corrective measure documented in the original Environmental Compliance reports.
2 nd Quarter	Thirteen (13) Housekeeping/ BMPs One (1) Minor Oil Spill	
3 rd Quarter	Fifteen (15) Housekeeping	
4 th Quarter	Twelve (12) Housekeeping One (1) Unknown Discharge Observed	

Source: Environmental Compliance IDIQ N40192-21-D-1820 - Facility Inspection Report

Additional storm water conveyance system inspections are conducted at the Guam High School facility within the Naval Hospital area. This sub-section of the Naval Hospital complex is covered under a Guam EPA SDWA Class V UIC permit. Regular storm drainage system maintenance and inspection is conducted monthly to ensure compliance with the UIC permit conditions.

Plans to abandon the UIC chambers in favor of a percolating ponding basin are in place. Stormwater conveyance inspections in accordance with the UIC permit conditions will continue until the conversion project is completed. A total of twelve (12) inspections and corrective action reports were provided by the Environmental Compliance IDIQ Contractor during this reporting period; reports found in Appendix L2.

Past Year Activities:

- Quarterly stormwater routine facility inspections were conducted from eighteen industrial/commercial facilities.
- Conducted monthly stormwater conveyance inspections at Guam High School facility within the Naval Hospital compound in accordance with the Guam UIC regulation.

Future Year Activities:

- Modify Environmental Compliance IDIQ to include additional facility inspections as needed.
- Continue to incorporate existing corrective action program in the MS4 enforcement response plan.

- Continue to maintain the NBG facility inspection requirements in the new BOS, HAZWASTE and Environmental Compliance IDIQ contracts.
- Perform assessment on Guam High School facility once the ponding basin conversion project is completed and incorporate in the SWMP inspection program where applicable.

3.6.2 Storm Sewer and Catch Basin Maintenance

NBG maintains a performance-based ground maintenance contract which incorporate the management of the storm drain systems. Maintenance contract includes removal of trash, debris, and vegetation from curb gutters, inlets, brow ditches, drainage channels, swales, catch basin, yard drains and other devices used to direct flow of run-off. Table 7 below provide the scope of the storm drainage system maintenance contract:

Table 7: NBG Permitted Area Storm Drainage System Maintenance

Location	Annual Requirements	Performance Standard
NBG (including Naval Magazine Area)	31,307 LF	No evidence of obstructions in the visible area of the drainage systems. All accumulated obstructions and debris shall be removed from the work site and disposed of at the end of each workday.
NBG Housing:	6,452 LF	
Lockwood Terrace		
Nimitz Hill		
Apra View		
Apra Palm		
Harbor View		
North Tupalao		
Naval Hospital* (including Ocean Ridge Housing)	2,491 LF	
Source: NAVFAC Marianas Contract No.: N40192-20-D-9000		
Note: The Guam High School facility within the Naval Hospital area is covered under a Class V UIC permit. Regular storm drainage system maintenance and inspection is conducted monthly to ensure compliance with the UIC permit conditions.		

Contractors are also obligated to notify NBG of damages or other stormwater conveyances system issue outside the scope of their contract within 24 hours of discovery.

Past Year Activities:

- The storm sewer and catch basin maintenance program description was included and part of Contract N40192-20-D-9000 deliverables.
- Implemented existing storm sewer cleaning and trash removal in accordance with NAVFAC Marianas Facility Services Contract No.: N40192-20-D9000.

- Required storm sewer maintenance contractor to report storm sewer conveyance damages / issues within 24 hours of discovery.

Future Year Activities:

- Evaluate the effectiveness of the storm sewer inspection and maintenance program and determine if modification is necessary to prevent debris and other pollutants from reaching the MS4 conveyance system and nearby navigable waters.

3.6.3 Street Sweeping and Cleaning

Street sweeping has proven to be an effective method of removing sediment and debris from roadways before it reaches the drainage system. NBG maintains a performance-based street sweeping contract for cleared pavement, residential and non-residential areas. Contract includes roads and other paved areas such as parking lots an open storage area. Table 8 below provide the scope of the storm drainage system maintenance contract:

Table 8: NBG Permitted Area Street Sweeping Schedule

Location	Requirements	Performance Standard /
EODMU-5	325 MSF Quarterly	Contractor shall sweep roads and other paved surfaces to ensure they are clear in accordance with the specified Common Output Level.
NBG Housing:	2,500 MSF Monthly	
Lockwood Terrace		
Nimitz Hill		
Apra View		
Apra Palm		
Harbor View		
North Tipalao		
Naval Hospital	650 MSF Monthly	

Source: NAVFAC Marianas ISWM Contract No.: N40192-21-D-9000

Note: Some facility names are redacted for OPSEC reason.

Past Year Activities:

- The streets, roads and parking lot evaluation are conducted on a monthly basis per ISWM Contract No.: N40192-21-D-9000.
- Implemented existing street sweeping and trash removal in accordance with NAVFAC Marianas Facility Services Contract No.: N40192-21-D9000.

Future Year Activities:

- Continue to perform street, roads, and parking lot sweeping and trash removal to ensure areas are free and clear of litter and sediment.
- Continue to incorporate street, roads and parking lots inspection and cleaning to the new environmental compliance contract.

3.6.4 Pesticide, Herbicide and Fertilizer Application Management

Written procedure for chemical application management will be included in the NBG MS4 SWMP. Control measures for this BMP will be identified in the SWMP document.

Although formal BMP implementation in accordance with the SWMP is not required for this reporting period, NBG has an ongoing program with existing control measures designed to ensure that pesticides and herbicides are safely and properly applied, and the application process does not affect or enter U.S. waters to the MEP. NBG uses an integrated pest management approach and conducts pesticide / herbicide application only when no other non-chemical approaches are practical.

NBG maintains a grounds maintenance contract (NAVFAC Marianas Contract No.: N40192-20-D9000) that includes restrictions, procedures, and reporting requirements to minimize landscaping-related pollution:

- The contract requires that herbicide spraying shall be performed only on still days and will be stopped when unfavorable weather or other conditions exist. Application of herbicides on NBG grounds needs prior approval of the Contracting Officer and contractors are required to submit an Herbicide Use Sheet.
- Only organic fertilizer is allowed in NBG grounds and applied at rates in accordance with the manufacturer recommendations. Contractors are required to submit a soil test analysis to determine the fertilizer type to be use.
- Extraneous vegetation, such as grass, weeds, and tree sprout shall be removed through weeding. Weeding shall include but is not limited; to pulling out of weeds, grass, vines, roots, and removing dried leaves and debris. To keep it away from waterways, contractor is required to remove weeding debris and dispose of from the work site at the end of each workday.
- Contractors are required to recycle all organic debris including grass clippings, brush, tree limbs, hedge clippings, etc. Organic debris shall be delivered to an approved recycling facility. Green waste collected from NBG grounds are tracked and recorded through a monthly compost report and annual green waste report.

All contractors involved in pesticide application within NBG facilities are required to have a Guam EPA certified pesticide applicator. This requirement ensures that contractor personnel involved in pesticide application have received training in the proper handling of chemicals. The brand, type, quantity, and locations of applied pesticides are monitored under the N40192-21-D-1820 contract.

Past Year Activities:

- The NBG chemical application program description is part of NAVFAC Marianas Facility Services Contract.
- Implemented contract restrictions and reporting requirements to minimize pollution from landscaping activities.
- Restricted pesticide application to Guam EPA certified pesticide applicators under the Installations Facility Service Contract.

Future Year Activities:

- Modify and / or expand the Facility Services Contract to meet the NBG MS4 SWMP chemical application program requirements.
- Continued implementation of contract restriction that minimized pollution generation through landscaping activities including the use of Guam EPA certified pesticide applicator only.
- Continue to maintain chemical application tracking requirements in the EV IDIQ Contract N40192-21-D-1820

3.6.5 Contract Management

All NBG contracts comes standard with Spec Item 2.10 (Environmental Management and Sustainability) requiring contractors to perform work consistent with the Installation's Environmental Management System (EMS) and comply with all applicable Federal, State, and local laws, regulations, executive orders, and with base-wide instructions, standards, and permit requirements. Inspection of any of the facilities operated by the Contractor may be accomplished by the Installation Environmental Protection Coordinator, or authorized officials on a no-notice basis during Government regular working hours.

All contractors and their sub-contractor, performing tasks that have the potential to cause a significant environmental impact, are required to provide competent personnel on the basis of appropriate education, training or experience. In the event an EMS non-conformance or environmental non-compliance associated with the contracted services, tasks, or actions occurs, the Contractors are required to take corrective and/or preventative actions, assume legal and financial liability for the non-compliance and take corrective action immediately to remedy the noncompliance.

Past Year Activities:

- Implemented standard contract format that includes Spec Item 2.10 in all NBG contracts.
- Required contractors to implement corrective and preventative actions for not

conforming to the base's EMS program and/or other environmental regulations.

Future Year Activities:

- Continued implementation of contract management procedure of Spec Item 2.10 inclusion on all NBG contract solicitation
- Incorporate contract Spec Item 2.10 into the MS4 SWMP ERP.

3.6.5 Debris Control Program

This is a multi-faceted program aimed at reducing discharge of pollutants into the MS4 system and may include all BMPs describe under Section 3.6 of this report. Crucial component of this program is the development of a Trash Reduction Plan and Asset Management System (AMS).

In accordance with the permit, NBG has developed a Trash Reduction Plan that outlines the procedure for trash reduction activities and monitor reductions of trash loads from the MS4.

The AMS will serve as an inventory of asset such as the storm drainage system, structural controls, and equipment and will be used to prioritize inspections / maintenance activities, such that resources are focused on areas that pose the greatest risk to water quality.

Past Year Activities:

- Description of the NBG's trash reduction plan and asset management system, including inspection program, was included and part of Contract N40192-21-D9000 deliverables.

Future Year Activities:

- Modify and / or expand the new EV Compliance IDIQ contract to include implementation and monitoring of the trash reduction plan and asset management system.
- Assess the volume of trash collected annually to observe the efficacy of the trash reduction plan. Analyze annual trend based on collected volume using graphical / statistical means.

3.6.6 Industrial / Commercial Stormwater Sources

NBG has an on-going program to minimize pollutants discharges from industrial / commercial sources through the MSGP and AHWWTNP NPDES permits.

Stormwater pollution prevention activities under the MSGP is provided in Section 3.6.1 of this report. In addition, NBG has an existing inventory and inspection schedule for all industrial / commercial facilities located within the MS4 permitted area. Although inspections are geared towards compliance with the Industrial Waste Discharge Certification Program (IWDCP) requirements of the AHWWTNP NPDES permit, provisions are included in the inspection

checklist to include other environmental concerns such as stormwater pollution.

Additionally, the Environmental Compliance IDIQ Contractor IWDCP Program Manager also handles the MSGP program and very keen to call-out possible industrial / commercial facility-related stormwater quality issues. Table 9 below provides an inventory of industrial/commercial facilities and their inspection schedule:

Table 9: FY 2023-2024 Industrial / Commercial Facility Inventory and Inspection

Facility ID		Date Inspected			
Building Name	Bldg. No.	2 nd QTR	3 rd QTR	4 th QTR	1 st QTR
X-ray BOWTS	791XR	02/02/2023	04/25/2023	08/09/2023	*
US Coast Guard Sector Guam	1, 2, 3, 5	03/06/2023	06/20/2023	09/12/2023	11/16/2023
MWR Typhoon Complex	75	03/06/2023	04/12/2023	09/29/2023	11/02/2023
NEX Car Care Center	257	03/06/2023	06/22/2023	07/21/2023	10/03/2023 12/14/2023
NEX Food Court	258	03/06/2023	04/12/2023	09/15/2023	11/02/2023
Orote Commissary	275	03/06/2023	06/29/2023	09/15/2023	12/14/2023
Wendy's	282	03/06/2023	04/12/2023	07/21/2023	12/14/2023
McCool Elementary/Middle School	311	03/07/2023	04/12/2023	07/21/2023	12/14/2023
Forklift Maintenance Shop	364	03/06/2023	05/22/2023	08/18/2023	11/02/2023
Transportation Vehicle Wash Rack	364A	03/06/2023	05/22/2023	08/18/2023	11/02/2023
Transportation Car Wash Station	375	03/06/2023	05/22/2023	08/18/2023	11/02/2023
Alpha Compound Heavy Vehicle Maintenance Shop	557A-C	03/14/2023	06/26/2023	09/11/2023	11/02/2023
Alpha Compound Vehicle Wash Rack	563	03/14/2023	06/26/2023	09/11/2023	11/02/2023
Navy Water Treatment Plant	576, 580, 597	02/21/2023	06/23/2023	07/21/2023	11/28/2023
US Navy Laboratory	585, 585A	03/07/2023	06/23/2023	07/21/2023	11/28/2023
Camp Covington Enlisted Dining Facility (Galley)	586	03/06/2023	04/12/2023	09/15/2023	12/14/2023
Camp Covington Boiler	586A	03/06/2023	04/27/2023	09/15/2023	11/03/2023
US Navy Dental Clinic	1	03/06/2023	06/30/2023	07/21/2023	*
MWR Auto Hobby Shop	1982A	02/17/2023	06/29/2023	07/21/2023	12/01/2023
NEX Laundromat	1988	03/06/2023	05/22/2023	07/21/2023	11/02/2023
Sierra Wharf BOWTS	1999	02/02/2023	04/25/2023	08/29/2023	11/09/2023
Orote Power Lanes	600	03/06/2023	04/12/2023	07/21/2023	11/02/2023
Fuel Farm Skim Pit	1706A	03/01/2023	05/30/2023	08/02/2023	11/09/2023
EODMUS	2105, 2108, 2109, 2112, 2113	03/21/2023	06/22/2023	09/07/2023	12/18/2023
Polaris Point Boiler	4451	03/29/2023	04/27/2023	09/29/2023	12/14/2023

Demineralization Plant	4907	03/10/2023	06/26/2023	07/27/2023	11/30/2023
Victor Wharf BOWTS	CNRVW	02/02/2023	04/25/2023	08/09/2023	11/09/2023
Sierra Wharf Package Boiler	PB-4	03/10/2023	04/27/2023	08/22/2023	11/14/2023
Uniform Wharf Package Boiler	PB-5	03/29/2023	04/27/2023	09/15/2023	11/09/2023
SEAL Compound	3000-3002, 3008	03/09/2023	06/16/2023	09/29/2023	11/16/2023
Steam Air Water Plant (Victor Wharf Boiler)	6025	03/10/2023	04/27/2023	09/29/2023	11/09/2023
Polaris Point BOWTS	CNRAF	02/02/2023	04/25/2023	08/09/2023	*

Source: Environmental Compliance IWDCP Quarterly Report.

Note: * Facilities are secured and not in operation.

Thirty-two (32) industrial / commercial facilities located within the MS4 permitted area were visited at least once every quarter for good housekeeping inspection. A total of one hundred twenty-four (124) inspections were conducted during this reporting period. All possible stormwater quality issues noted during the inspections are documented and forwarded to NBG Environmental program coordinator for corrective action.

NBG also maintains an inventory of various hazardous waste accumulation points. There are currently twenty-nine (29) satellite accumulation sites (SAS), five (5) less than 90-day and one (1) Conforming Storage Facility (CSF) for hazardous waste located within the MS4 permit area. Regular inspections are afforded to each of these facility in accordance with 40 CFR 264. This inspection also checks for the facility good housekeeping practices to prevent and reduce discharge of pollutants into the environment particularly the MS4 system from these sites. Table 10 below provides a summary of NBG hazardous waste accumulation site inspection activities:

Table 10: CY 2023 Hazardous Waste Facilities Inspection

HW Facility	No. of Facility	Inspection Frequency (EV contractor/HW contractor)	Total Facility Inspection
SAS	29	Monthly/Weekly	1,544
90-Day Facility	5	Monthly/Weekly	272
CSF	1	Monthly/Weekly	64

Sources: Hazardous Waste SAS Weekly Inspection Report – HAZWASTE IDIQ N40192-20-R-1800

Environmental Compliance IDIQ contract -- N40192-21-D-1820

Multiple SAS's are located within some facility / compound.

A total of one thousand eight hundred eighty (1880) hazardous waste facility inspections were conducted during this monitoring period.

Past Year Activities:

- The NBG industrial / commercial facilities inspection program description was included and part of Contract N40192-21-D-1820 deliverables.
- Implemented industrial facility inspection through the HAZWASTE IDIQ contractor's reports.

- Implemented good housekeeping inspections to various hazardous waste facilities through HAZWASTE IDIQ contractor's deliverables.

Future Year Activities:

- Modify and / or expand the environmental compliance contract to meet the NBG MS4 SWMP industrial / commercial facilities inspection requirements.
- Continued implementation of hazardous waste facilities inspection program.
- Update existing inspection procedures and checklist language to meet the NBG MS4 SWMP requirements.

Section 4 MONITORING REQUIREMENTS

The NBG MS4 comprehensive monitoring and assessment program is part of the SWMP document. This program outlines the technical and management procedures that will be implemented to meet the monitoring requirement of the MS4 permit.

4.1 Consolidated Information Tracking System

The permit requires NBG to develop an electronic tracking system to monitor compliance activities and facilitate data collection process that will be included in the annual reports. This required consolidated information tracking system is dependent on the MCM BMPs and other requirements specified in the SWMP.

An interim information tracking spreadsheet was created for the purpose of submitting the 5th annual report (Appendix J).

Past Year Activities:

- Description of the NBG's MS4 comprehensive monitoring and assessment program is included in the SWMP document
- Interim consolidated information spreadsheet was used to track and monitor the 5th annual report MS4 permit requirements.

Future Year Activities:

- Continue to consolidate information on the tracking system to monitor compliance activities and facilitate data collection process based on the NBG SWMP document requirements on a yearly basis.
- Continue to implement the compliance activity schedule based on the information tracking system on a yearly basis.

4.2 Sampling and Monitoring Program

The NBG SWMP includes a sampling and monitoring program which identifies NBG's stormwater outfalls subject for monitoring. The program describes the outfall sample collection, dry weather field inspection and their respective reporting schedules to Guam EPA and U.S. EPA.

NBG will implement the wasteload allocation (WLA)-based effluent limitations describe in Part 4.1.1 of the permit.

NBG utilized the services of the EV Compliance IDIQ contractor to comply with the sampling and analytical requirements of the permit. The contractor is required to use laboratories that are accredited to perform DMR sample analysis.

Past Year Activities:

- Identified a contract mechanism to implement the NBG MS4 monitoring program.
- MS4 samples from outfalls NFM2 and Vic3 were collected on September 05, 2023, and samples from outfalls WTP1, Nam01, and Talis1 were collected on September 11, 2023. All samples were analyzed for the listed conventional, non-conventional, priority parameters listed in Table 3 of NBG MS4 permit. Further required testing such as the Whole Effluent Toxicity (WET) and Enterococcus were also conducted.
- On October 24, 2023, laboratory analytical report received for outfall VIC3 and NFM2 WET test resulted in a "Fail" according to the US EPA Test of Significant Toxicity analysis for the urchin fertilization endpoint. The exceedance initiated an MS4 investigation conducted on October 27, 2023.
- MS4 outfalls Talis4, SIII, and AC1, were collected on February 02, 2023, for testing for Enterococcus.
- All other MS4 outfalls UNITAN1, SUM1, SRF4, AP11, Hosp4, IH9, NEX1, NVCC1, and ECov1 were not sampled for this reporting period due to the sites being inaccessible or insufficient flow from collection site for sampling.

Future Year Activities:

- Review of the completed SWMP sampling and monitoring requirements and assess existing resources. Program managers to submit request for additional funding if applicable.
- Continue to modify and / or expand the environmental compliance contract to meet the NBG SWMP sampling, monitoring, recordkeeping and reporting requirements.

4.3 Program Evaluation

This requirement is dependent on the availability of sampling and analytical results. NBG plans to adopt a three-tiered approach for future evaluation of its MS4 program implementation. Program effectiveness assessment will include the following step:

- Assessment of program operations
- Evaluation of social indicators through surveys
- Outfall / Effluent quality monitoring.

Past Year Activities:

- Not applicable / required during this reporting period. Written strategy for the determination of NBG SWMP effectiveness is dependent upon the availability of sampling and analytical results.

Future Year Activities:

NBG's annual reports will be completed and submitted in accordance with the MS4 permit and the completed SWMP requirements. Reports will include a summary of collected data and the required assessment of the results.

4.4.1 Annual Monitoring Reports

Stormwater monitoring was not conducted during this reporting period due to several factors: Attempted to sample during a qualifying storm event; however, insufficient flow or no flow was observed upon arrival to the outfalls, incorrect monitoring locations were sampled, WET samples analyzed using an improper salt solution.

Annual analytical reports will be submitted in a format and schedule consistent with the requirements specified in Part 5.2.3.7 of the permit.

Past Year Activities:

- Discharge Monitoring Reports (DMR) was submitted to US EPA and Guam EPA based on the requirements specified in Part 5.2.3.7 of the permit (Appendix K).
- Modified Environmental Compliance IDIQ contract to include additional monitoring to increase program effectiveness. Monitoring must be conducted in accordance with test procedures approved under 40 CFR Part 136.
- Implemented sampling and monitoring based on the program that is described in the SWMP document.
- Submitted annual monitoring report based on the requirements specified in Part 5.2.3.7 of the permit.

Future Year Activities:

- Develop list of pollutants of concern (POC), in addition to POC's listed in Table 3 of the permit, which may be observed from stormwater discharges specific to a particular outfall where applicable.

4.4.2 Year 5 Annual Report

This Year 5 reporting period annual report will be submitted to US EPA Region 9 NPDES

Permit Section and Guam EPA's Water Pollution Control Program Manager upon review and approval of the IEPD. This annual report will be made available online on the following webpages:

- <https://www.cnmc.navy.mil/Guam/>
- http://www.cnmc.navy.mil/regions/jrm/installations/navbase_guam/
- <https://jrm.cnmc.navy.mil/installations/NAVBASE-Guam/About/Departments/Environmental>

4.4.3 Fiscal Analysis

The Annual Fiscal Analysis will be completed and submitted as required by the permit. The analysis summarizes the capital needed to maintain the expenditures of operation, maintenance and resources needed to meet the development, implementation and enforcement activities required by the SWMP document.

See Appendix D: NBG MS4 Year 5 Fiscal Analysis

Appendix A:

NBG MS4 Permitted Facilities Overview

Appendix B:

NBG MS4 General Permit Schedule Summary

Appendix B: Naval Base Guam MS4 General Permit Schedule Summary
Permit Effective Date: February 1, 2019

Permit Citation	Description of Requirement	Permit Language	Due Date	Permit Year
Part 2.1, 3.4.1 and 3.5.1	Begin implementation of permit requirements, including existing local construction and post-construction requirements	Effective date of permit (EDOP)	01-Feb-2019	1
Part 4.1.1	Develop TMDL compliance plan and implementation schedule (if appropriate); otherwise TMDL requirements take effect 18 months after permit effective date	12 months after EDOP	01-Feb-2020	2
Part 2.2	Develop SWMP consistent with permit requirements for first 18 months	18 months after EDOP	01-Aug-2020	2
Part 2.3.1	Ensure adequate legal authority			
Part 2.4.1	Develop enforcement response plan			
Part 3.1.1	Develop public education program			
Part 3.2.1	Develop public participation program			
Part 3.4.1	Update existing construction site controls program to be consistent with permit			
Part 3.5.1	Update existing new development/redevelopment controls program to be consistent with permit			
Part 3.6.1	Develop municipal operations plan			
Part 5.1	Develop information tracking system			
Part 5.2.1	Develop monitoring plan			
Part 3.3.1	Develop IDDE program	Two years after EDOP	01-Feb-2021	3
Parts 3.4.5.1.1.1 and 3.4.5.1.3.1	Training for construction inspectors and plan reviewers			
Part 3.6.5.2.1.4	Implement pollution prevention plan for municipal operations			
Part 3.6.12	Develop trash reduction plan			
Part 3.6.13	Develop asset management plan			
Part 3.7.1	Develop program for industrial/commercial sources			
Part 3.3.7.2	Training for general field staff regarding IDDE program			
Part 3.5.7	Develop retrofit plan			
Part 3.7.3.2	Notification of industrial/commercial of program requirements			
Part 3.1.3	Assess effectiveness of public education program			
Part 5.4.1	Submit annual report	Four years after EDOP	01-Feb-2023	5
Appendix B, Section 1	Permit reapplication	90 days after each reporting period		
Parts 3.6.12.1.6 and 3.6.12.3	Compliance with trash reduction requirements	Within 6 months of permit expiration		
Parts 4.1.1	Compliance with TMDL requirements	As soon as practicable but not to exceed 15 years from development of plan		
		As soon as practicable (if permit is modified to add a compliance schedule)		

Appendix C:

NBG Environmental Policy Statement

Appendix D:

NBG MS4 Fiscal Analysis Report (Year 4)

Appendix E:

Annual Training Rosters

STORMWATER TRAINING RECORDS

CALENDAR YEAR 2023

prepared by:



N40192-21-D-1820

Appendix F:

MS4 Dry Weather Field Screening Report

U.S. NAVAL BASE GUAM

**MS4 Dry Weather Field Screening
(Permit ID: GUS040000)**

CALENDAR YEAR 2023

prepared by:



N40192-21-D-1820

Appendix G:

IDDE Findings/Corrective Actions & SSO Reports

U.S. NAVAL BASE GUAM

Sanitary Sewer Overflows Report

NPDES GU0110019

Calendar Year 2023

prepared by:



N40192-21-D-1820

**U.S. Naval Base Guam
Sanitary Sewer Overflows Report
NPDES Permit No. GU0110019**

Calendar Year 2023

Code	Incident Date & Time	Point of Contact	Sanitary - EA EV Compliance Responder	Description & Location of Source	Volume Released	Duration of Release	Nearest Body of Water	NBC Notification	Cause of the Spill	Corrective Actions
	No spills reported in January									
	No spills reported in February									
	No spills reported in March									
	No spills reported in April									
R	5/15/2023 1720H	Annex 1604 Wastewater	Matthew Boria	Collection Holding Tank (CHT) hose from USS Marianus Island discharged sewage onto Tango Wharf	50 gallons	~ 10 minutes	Apra Harbor	R Canascho	USS Marianus Island operator failed to properly flush/blowdown the CHT hose prior to dropping base onto Tango wharf. T/CHT6 This caused residual sewage inside the hose to backflow onto the Wharf	Annex 1604 wastewater operator immediately placed the CHT hose inside the berm of Tango Wharf to contain the sewage. Sewage water inside the berm was then pumped out with a pump truck and the area was disinfected with sodium hypochlorite solution
	No spills reported in June									
	No spills reported in July									
	No spills reported in August									
	No spills reported in September									
	No spills reported in October									
	No spills reported in November									
	No spills reported in December									

Notes:
• R - Reportable
• NR - Non Reportable

Appendix H:

PWD Memorandum to FEAD

Appendix I:

NBG MS4 Construction Site Inspection Summary

**2023 Naval Base Guam
MS4 Construction Site Inspection Summary**

Project and Contractor Information	Project Site	NPDES ID#	SWPPP Review Process		NOI Coverage Effective Date	NOI Coverage Expiration Date	Pre-Construction Inspection (Date, Inspection Report Reference)	BMP Inspection Dates*	Post Construction Inspection (Date, Inspection Report Reference)
			Reviewed By / Date	Approved By / Date					
Pacific Rim Construction POC: Beltran B. Serisola Jr. Title: QC Manager Phone: 727-4302 Email: bserisola@pacificrimco.net	P-669 1MW Solar Array	GUR10004I						-	On-going
								15-Jun-23	
								28-Sep-23	
								26-Dec-23	
H2O Guam JV POC: Todd Cooper Title: Env. Manager Phone: 483-5965 Email: Cooper@obayashiguam.com	Lima Wharf Repair	GUR10002T					4/10/2021	22-Mar-23	On-going
			2/18/2021 N. Buyao	2/18/2021 N. Buyao	2/23/2021	2/16/2022		27-Jun-23	
								27-Sep-23	
								27-Dec-23	
Black Construction POC: Janna Soriano Title: Env. Manager Phone: 671-797-6334 Email: jannas@blackguam.com	P-519 X-Ray Wharf Repair	GUR100058						-	On-going
			7/11/2022 D. Cowley		6/2/2022	9/9/2024		13-Jun-23	
								27-Sep-23	
								27-Dec-23	

Appendix J:

MS4 Compliance Tracker

MCM	Measurable Goal ID Number	Product Name	Description	Measurable Goal	Responsible Department
MS4 Requirement	MS4 Requirement Summary				
MCM1	ID01	Distribution of Informational Materials	Perform distribution and tracking of informational materials via hard copies and electronic means IAW Section 2.3.1.1 / 2.3.2.2 of the SWMP and / or Measurable Goal 2-1 / 2.4. Tracking of distribution, at a minimum, should include topic and quantity distributed to target audiences. Facilitate posting of informational material on JRM/NBG official and Social Media sites. Distribution effort may be combined with other requirements including during facility inspections, SWPPP training and New hire orientations (Measurable goal 2-8).	2-1 2-4 2-8 3-7 7-1	NBG EV / KTR
MCM1	ID02	Development and Distribution of Classroom Informational Materials	Develop informational materials tailored for school children IAW Section 2.3.1.2 / 2.3.2.2 of the SWMP and/or Measurable Goals 2-2 / 2-4. Track quantity and variety of materials posted. Facilitate posting in school premises (GHIS, McCools) and JRM/NBG official and social media websites.	2-2 2-4	NBG EV / KTR
MCM1	ID03	Electronic media Outreach	Facilitate posting of materials on NBG official and social media sites. These are for materials other than what is covered on other ELINS or any other information that may be required by the regulators. Encourage Tenants and community groups to participate in SWMP-related programs. Provide support / mechanism to allow viewers to navigate links MS4 documents including annual MS4 Annual Report	2-4 2-15	NBG EV / KTR
MCM1	ID04	Informational Materials Development	Develop new topic / additional informational material, for distribution IAW Section 2.3.1 of the MS4 SWMP. Materials may be in brochure format and provide 500 hard copies for distribution. Example: - Privately owned vehicle maintenance - Hazardous waste brochures - LID Inspection and Maintenance - Reporting Visual Erosions	2-1	NBG EV / KTR
MCM1	ID05	MS4 Training Presentation Material and Records	Update / verify existing MSGP, IWDGP, and New Hire Presentations to include requirements of the MS4 permit. Training shall cover such as spill response procedures, good housekeeping, maintenance requirements and BMPs to prevent stormwater contamination. Continue to train all employee who works in areas where industrial materials or activities exposed to stormwater or who are responsible for implementing activities necessary to meet the conditions of the permit.	2-1	NBG EV / KTR
MCM1	ID06	Annual Commercial / Industrial SWPPP Training	Develop an annual training program IAW the most current MS4 stormwater permits for facilities not covered under MSGP. Training shall cover such as spill response procedures, good housekeeping, maintenance requirements and BMPs to prevent stormwater contamination. Train all employee who works in areas where industrial materials or activities exposed to stormwater or who are responsible for implementing activities necessary to meet the conditions of the permit per Section 2.3.4.1 / Measurable Goal 2-7 of the MS4 SWMP	2-7	NBG EV / KTR
MCM1	ID07	Newly Hire Personnel Training	Develop presentation materials and provide new personnel with an overview of NBG's MS4 SWMP during contractor's (BOS, Housing, etc) during new-hire orientations IAW Section 2.3.4.2 / Measurable Goal 2-7 of the SWMP. Coordinate with A200 CORs for the orientation schedules. Track quantities and number of attendees	2-7	NBG EV / KTR
MCM1	ID08	Newly Hire Personnel Training (Government)	Develop presentation materials and provide new personnel with an overview of NBG's MS4 SWMP during Government's new-hire indoctrination IAW Section 2.3.4.3 / Measurable Goal 2-7 of the SWMP. Track quantities and number of attendees.	2-7	NBG EV / Government IIR
MCM2	ID09	Public review of SWMP and other MS4 document	Encourage Base Tenants participation by providing a mechanism review and provide input on the overall program IAW Section 2.4.1. Compile and track the quantity of public input. Assess and incorporate applicable comments during the regular SWMP review and update	2-9	NBG EV
MCM2	ID10	SWMP Slogan and Logo Design	IAW section 2.4.2, invite Base Tenants to participate in the design and development of the NBG MS4 slogan and logo that can be use in the public participation campaign including storm drains labeling	2-10	NBG EV
MCM2	ID11	Community Clean-up Events	Encourage various sectors / units of NBG community by organizing community relations (COMREL) activities such as streets and beach clean-ups within or outside NBG's permitted area. Track the quantity of MS4 COMREL related activities each year IAW Section 2.4.3	2-11	NBG EV
MCM2	ID12	Storm Drain Stenciling	IAW Section 2.4.4, Organized storm drain marking activities by establishing partnership with COMREL personnel of various NBG Tenants to promote stormwater pollution awareness and discourage illicit discharges. Track the quantity of completed stenciling.	2-12	NBG EV

MCM2	ID13	Community partnerships	NBO will participate in local environmentally-related community outreach events by active presentation or setting up information kiosk. Track the number of attendees and quantities of educational materials distributed. Identify and establish a list of possible partnership with local organization to widen opportunities for public outreach.	2-13 2-14	NBG EV
MCM2	ID14	Baseline Survey	Conduct baseline survey to gauge existing level of public awareness and behavior prior to active implementation of NBG's MS4 public education and outreach program. Respondents can also be selected during the new-hire orientation.	2-16	NBG EV / KTR
MCM2	ID15	Follow-up survey	NBO shall conduct follow-up survey within two years of public education and outreach program implementation to assess changes in public awareness using the SWMP statistically valid survey procedure.	2-16	NBG EV / KTR
MCM3	ID16	MS4 Map	NBG to develop map of the area covered by the permit that identify stormwater features and facilities. Features to include stormwater inlets, outfalls and BMPs locations as well as commercial and industrial facilities.	3-1	NBG EV
MCM	Measurable Goal ID Number	Product Name	Description	Measurable Goal	Responsible Department
	ID17	Priority Outfalls	Identify Priority outfalls in coordination with Guam EPA. Identify priority outfall location in the Map.	3-1	NBO EV
MCM3	ID18	Annual MS4 Map Updates	Update NBO MS4 Field maps and database for any changes observed in the conveyance system (storm drains, Catch Basins, outfalls ...) and facilities during the calendar year. Field mapping updates shall be conducted IAW Section 3.2.	3-1	NBG EV / KTR
MCM3	ID19	Dry Weather Field Screening	C164 Conduct dry weather field screening benchmark IAW Section 3.3.4 of the MS4 permit. Provide sampling and analysis for indicator parameters (NH3, Conductivity, Surfactants, pH and Enterococcus) if flow is detected. Provide a report that at a minimum, shall be in narrative and tabulated format to include field screening findings, sampling locations/IDs, Sampling date, laboratory report ID and analytical results. All outfall must be sampled staggered across the permit period. Estimated number of outfalls per year = 10.	3-3	NBG EV / KTR
MCM3	ID20	IDDE Public Reporting Hotline	NBO to assign an official MS4 Illicit Discharge complaint hotline: 117 / 333-4357 or NBG EV MS4 PM? Implement existing sewer overflow and HAZMAT spill response programs	3-6	NBG EV
MCM3	ID21	IDDE Public Reporting and Complaint Investigation	Respond to illicit discharge reports and complaints, including those that occurred in active construction sites. Investigate and observe suspected / reported flow and determine source or responsible party. Provide a summary of the response and submit to NBG for corrective action / enforcement.	3-5	NBG EV / KTR
MCM3	ID22	Hazardous Waste Accumulation Points Inspection	Implement existing hazardous facilities inspection program	3-8	EVI IDIQ
MCM3	ID23	SPCC Training	Implement existing SPCC training program	3-9	EVI IDIQ
MCM4	ID24	Adopt the 2014 DPR1 CSWPPP	Issue a memorandum instructing FEAD to adopt the 2014 DPR1 CSWPPP for construction activities with a total land disturbance of >1 acre.	4-1	NBG EV / FEAD
MCM4	ID25	FEAD ET's and CME's MS4 Awareness / Meeting	Provide a presentation and conduct an awareness training with FEAD personnel (ET's and CME's).	4-2	NBG EV / FEAD
MCM4	ID26	Plan Review and Approval	Adopt the 2014 DPR1 CSWPPP procedure and checklist when reviewing and approving site-specific SWPPP.	4-2	NBG EV / FEAD
MCM4	ID27	Development of Construction Site Inventory	Maintain inventory of all construction sites in Iefacma / eprojects. Develop and maintain inventory of all active construction sites with total land disturbance of greater than 1 acre to include SWPPP, NOI and inspection information.	4-3	NBG EV / FEAD
MCM4	ID28	Development of Construction Site Inspection Program	Adopt the 2014 DPR1 Inspection procedure and checklist for active construction site inspection.	4-4	NBG EV / FEAD
MCM4	ID29	Construction Site Inspections	Conduct construction site BMP Inspections for qualified active construction sites IAW MS4 Permit and DPR1 CSWPPP requirements. Provide an inspection summary report including findings and non-conformances. Submit report to CME for corrective measures and / or enforcement action. Update Construction site inventory and inspection tracker.	4-4	NBG EV / FEAD / KTR

MCM4	ID30	Distribution of Construction Sites Informational Materials	Perform distribution and tracking of informational materials targeted for construction site workers IAW Section 4.9 of the SWMP. Facilitate posting of materials on JRM/NBG official and social media sites. Materials distribution tracking should include variety and quantity distributed.	4-5 2-3	NBG EV / FEAD / KTR
MCM4	ID31	Field Inspector Training	Develop and implement a training program for active construction site inspectors and post-construction BMP inspectors. Maintain records of training Certificates.	4-6	NBG EV / FEAD / KTR
MCM5	ID32	Post Construction BMP management Program	Adopt DPRI CSWPPP post construction BMP Program and acceptable post construction structural BMPs.	5-1	NBG EV / FEAD
MCM5	ID33	Post Construction BMP Site-Plan Review	Adopt DPRI CSWPPP post construction BMP Program and acceptable post construction structural BMPs and verify performance standard.	5-1	NBG EV / FEAD
MCM5	ID34	Post Construction BMP Inventory	Develop Post-construction BMP inventory. Catalog BMP conditions beginning program implementation.	5-1	NBG EV / FEAD
MCM5	ID35	Post-construction BMP inspection	Develop and implement a post-construction BMP program. Each BMP must be inspected and its condition catalog at least once every permit term.	5-1	NBG EV / FEAD / KTR
MCM5	ID36	Post-construction BMP Maintenance Program.	Develop and implement a post-construction BMP maintenance program.	5-1	NBG EV / FEAD / KTR
MCM5	ID37	Post-construction BMP Maintenance Documentation	Document and report the number and description of maintenance, repairs and retrofit performed.	5-1	NBG EV / FEAD / KTR
MCM	Measurable Goal ID Number	Product Name	Description	Measurable Goal	Responsible Department
MCM6	ID38	Inventory of MS4 Related Assets	Develop an inventory of NBG MS4 assets and their locations.	6-1	NBG EV
MCM6	ID39	Preliminary Prioritization Ranking	Develop assessment program in prioritizing inspection and maintenance rankings.	6-1	NBG EV
MCM6	ID40	Weekly Visual Inspection of High Priority Facilities	C159 Conduct weekly visual inspections IAW Section 3.6.4.3.1 of the MS4 permit to ensure areas, including materials and equipment, are clean and orderly, to minimize pollutant discharge. Check for evidence of spills and illicit discharges. Document findings and take images if necessary, submit to Government for action. Estimated number of locations (facilities, compound) = 5 (Note: Excluding HazWaste facilities).	6-1	NBG EV / Tenants / KTR
MCM6	ID41	MS4 "High Priority" Facilities Quarterly Comprehensive inspections	C160 Perform a comprehensive inspections IAW Section 3.6.4.3.2 of the MS4 permit. Document where industrial materials or activities are exposed to stormwater with particular attention to waste storage areas, dumpster, vehicle and equipment maintenance/fueling areas, materials handling areas and similar potential pollutant-generating areas. Document findings and take images if necessary, submit to Government for action. Estimated number of locations (facilities, compound) = 5 (Note: Excluding facilities covered under the MSGP).	6-1	NBG EV / KTR
MCM6	ID42	MS4 "Priority C" catch basin inspection.	C161 Conduct annual catch basins IAW Section 3.6.5.1.2 of the MS4 permit. Provide documentation of findings, provide images if necessary, and submit to the Government for action. Estimated number of "Priority C" catch basins = 50.	6-1	NBG EV / KTR
MCM6	ID43	MS4 "Priority B" catch basin inspection.	C162 Conduct semi-annual catch basins IAW Section 3.6.5.1.2 of the MS4 permit. Provide documentation of findings, provide images if necessary, and submit to the Government for action. Estimated number of "Priority B" catch basins = 25.	6-1	NBG EV / KTR
MCM6	ID44	MS4 "Priority A" catch basin inspection.	C163 Conduct semi-annual catch basins IAW Section 3.6.5.1.2 of the MS4 permit. Provide documentation of findings, provide images if necessary, and submit to the Government for action. Estimated number of "Priority A" catch basins = 12.	6-1	NBG EV / KTR

MCM6	ID45	Street and Parking Lots Inventory	Develop an inventory of roads, streets and parking lots located within the permitted area.	6-1	Grounds maintenance Contract
MCM6	ID46	Street Sweeping Prioritization and Schedule	Implement existing street sweeping program to reduce accumulation of debris in the MS4. Review, redistribute and improve efforts as necessary to meet permit requirements.	6-1	Grounds maintenance Contract
MCM6	ID47	Pesticide, Herbicide and Fertilizer Application Management	Implement a Pesticide, Herbicide and Fertilizer Application Management program. Included herbicide restriction procedure and reporting in the grounds maintenance contract. Included integrated pest management measures in the grounds maintenance contract.	6-1	Grounds maintenance Contract
MCM6	ID48	Trash Volume Monitoring	Monitor volume of trash collected from permitted area. Analyzed annual trend based on collected volume using graphical / statistical means.	6-2	NBG EV / Ground Maintenance Contract
MCM6	ID49	Visible Erosion Monitoring	Respond to reports of visible erosions from the public. Document response to support request for temporary or permanent corrective measures.	7-1	NBG EV / KTR
MCM6	ID50	Develop BMP field Manual	Develop a list of applicable BMP's that can be used within the permitted area to address any deficiency or non-conformance found during inspections, analytical monitoring and audit.	8-1	NBG EV
MCM6	ID51	Inventory of NBG Facilities	Develop an inventory of Facilities located within the permitted area.	9-1	NBG EV
MCM6	ID52	Inventory of Commercial Facilities	Develop an inventory of commercial facilities within the permitted area based on Section 3.7.2.2.1 of the permit.	9-1	NBG EV
MCM6	ID53	Inventory of Industrial Facilities	Develop an inventory of industrial facilities within the permitted area based on Section 3.7.2.2.1 of the permit.	10-1	NBG EV
MCM6	ID54	MS4 Routine Industrial and Commercial Facility Inspection Procedure Update	CI58 Update / verify existing IWDCP facility inspection procedure to include checks for signs of industrial waste discharges into the stormwater system and evidence of spills that may introduce pollutants into the MS4. Current practice is to note possible MS4 stormwater issues in the "other comments" item in the inspection checklist and reported to the Government for action. Continue to conduct routine facility inspections IAW the most current MSOP, SWPPP, and IWDCP at areas of the facility where industrial activities occur.	9-1 10-1	NBG EV / KTR
MCM	Measurable Goal ID Number	Product Name	Description	Measurable Goal	Responsible Department
Monitoring and Reporting	n/a	MS4 Annual Monitoring Report	CI65 Conduct annual outfall IAW Section 3.2.2 of the MS4 permit. Provide sampling and analysis for parameters listed in Table 3 of the permit. Provide a report that at a minimum, shall be in narrative and tabulated format to include field screening findings, sampling locations/IDs, Sampling date, laboratory report ID and analytical results. All outfall must be sampled staggered across the permit period. Estimated number of outfalls per year = 10.	Permit Requirements	NBG EV / KTR
Monitoring and Reporting	n/a	Toxicity Reduction Evaluation (TRE) Work Plan Accelerated Toxicity Testing	CI66 Prepare and submit an initial Investigation Toxicity Reduction Evaluation (TRE) & Plan IAW Section 3.2.2.3 of the Permit. Execute the plan when triggered. The plan shall outline procedures for addressing exceedances above the Chronic Whole Effluent Toxicity (WET) permit limit.	Permit Requirements	NBG EV / KTR
Monitoring and Reporting	n/a	MS4 Annual Report	CI67 Prepare and submit an annual report IAW the requirements in part 2.2 of the permit including but not limited to, a summary of past year activities, specific quantities achieved and summary of enforcement actions, where applicable; a description of effectiveness of each SWMP program component or activity; monitoring data collected during the reporting period, planned activities and changes for the next reporting period.	Permit Requirements	NBG EV / KTR

Administrative Requirements	n/a	Record of Regulatory or other Government Interface	C153 Participate in regulatory or other government official site visits, audits, inspections, or meetings, to include necessary coordination, preinspection of facility to ensure compliance with permit and regulations, address any deficiencies during preinspection, obtain records (if needed), providing technical documents when requested, and responding to any technical questions from regulators and/or government officials. Prepare and submit summary record of regulator site visits/audits/inspections/ meetings and associated sign-in rosters. Summary record shall indicate pertinent information including but not limited to: date and time of engagement, type of interface, name and affiliation/title of attendees, purpose and summary of visit, highlights of actions required	Permit Requirements	NBG EV / KTR
Administrative Requirements	n/a	Unscheduled Compliance Response Data Calls	C154 Prepare and submit responses to requests for MS4 information and data calls ranging from but not limited to data summaries, program compliance status, media- specific compliance recommendations, etc	Permit Requirements	NBG EV / KTR
Administrative Requirements	n/a	MS4 Recordkeeping and Documentation	C155 Maintain all official Clean Water program documentation and records required of the Navy by law for the life of the contract. Submit upon request as necessary to respond to data calls, audits, regulatory requests, and public inquiries. Turn over records to the government at the close of contract.	Permit Requirements	NBG EV / KTR
Administrative Requirements	n/a	MS4 Storm Water Management Plan Update	C156 Revise and update the SWMP IAW the permit to reflect any changes in operation, maintenance, or construction of new facilities that may affect the discharge of significant quantities of pollutants. Include any newly identified information (e.g., maintenance activities, significant spills, etc.); and any changes that are required for best management practices to ensure compliance with the conditions of the MS4 permit	Permit Requirements	NBG EV / KTR
Administrative Requirements	n/a	MS4 Permit Renewal Application	C168 Prepare permit application for renewal of NPDES Permit No. GUS040000. The permit expires 31 January 2024. Provide all necessary supporting data (e.g., site plans, maps, discharge information, etc.) and prepare IAW the MS4 permit and 40 CFR Part 122.21(b)	Permit Requirements	NBG EV / KTR

Element ID	Description of BMP	Measurable Goal(s)	MCM Status / Update	Performed / Completed?					Responsible Entity/Department
				Y1	Y2	Y3	Y4	Y5	
1A	Informational Materials: Provide stormwater pollution prevention brochures to existing base tenants. Distribute brochure to new personnel via housing office and/or during employee orientation / indoctrination.	01 - Perform distribution and tracking of Informational materials via hard copies and electronic means. Tracking of distribution, at a minimum, should include topic and quantity distributed to target audiences.	Contract awarded to Environmental Compliance IDIQ contractor - distribution to occur in the next reporting period.	n/a	n/a	*	*	*	NBG EV MS4 Compliance Contractor
		02 - Develop Educational materials such as posters, designed specifically for school children and posting at school premises. Track quantity and variety of materials posted.	Contract awarded to Environmental Compliance IDIQ contractor - reporting to occur in the next reporting period.	n/a	n/a	*	*	*	NBG EV MS4 Compliance Contractor
		02 - Create new materials if needed and update existing informational materials based on the effectiveness assessment.	Contract awarded to Environmental Compliance IDIQ contractor - reporting to occur in the next reporting period.	n/a	n/a	n/a	n/a	*	NBG EV MS4 Compliance Contractor
		04 - Develop informational materials for various target audiences within the Permitted area. Track and report the number of stormwater brochures that were provided to NBG personnel including housing, schools and commercial tenants.	Completed Development of 3 educational materials topics of 300 copies each, available on the NBG JRM Environmental Page. Contract awarded to Environmental Compliance IDIQ contractor - reporting to occur in the next reporting period.	n/a	Yes	Yes	Yes	Yes	NBG EV MS4 Compliance Contractor
		04 - Develop educational materials designed specifically for construction site operators. Track and report the type and quantity of materials distributed.	Completed development of 1 Construction Site Educational Material. Quantity distributed being tracked.	n/a	150	100	n/a	Yes	NBG EV / FEAD
		Stormwater Pollution Prevention Video - NBG to produce a spot to run on the The Joint Military News Network (JMN) and JRM Youtube Channel. A link will be posted on NBG/JRM Webpages.	As required - Pending MCM1 evaluation.	n/a	n/a	n/a	n/a		NBG EV MS4 Compliance Contractor
1B	Stormwater Education/Outreach Program: NBG to provide a comprehensive program.	03 - Electronic media outreach: SWMP document will be submitted to NBG PAO and posted on NBG website. Provide support/ mechanism to allow viewers to navigate links MS4 documents including annual MS4 Annual Report.	NBG MS4 site Completed. Link of NBG FB Page.	n/a	n/a	Yes	Yes	Yes	JRM PAO NBG EV MS4 Compliance Contractor
		03 - Create Stormwater quality page on NBG Websites.	Stormwater Management Program page created on the NBG JRM website.	n/a	n/a	Yes	Yes	Yes	
		03 - Post MS4 public participation activities and MS4 educational materials on NBG's social media pages (i.e. Facebook).	MS4 public participation activities and MS4 educational materials posted on NBG's Facebook page.	n/a	n/a	*	*	Yes	
		03 - Track public comments and reactions to posted materials. Evaluate public input and update program if necessary.	Pending	n/a	n/a	*	*		
		05 - Update / verify existing MSGP, IWDCP, and New Hire Presentations to include requirements of the MS4 permit. Training shall cover such as spill response procedures, good housekeeping, maintenance requirements and BMPs to prevent stormwater contamination.	ELIN D157	n/a	n/a	Yes	Yes	Yes	
1C	Provide stormwater pollution prevention education to base tenants: NBG to provide annual SPCC and SWPP training to groups that may be critical in complying with the MS4 permit requirements including IDDE identification and reporting procedure.	06 - Track and report the number of annual training sessions performed and facilities trained. Training to be tracked to include, but not limited to MSGP, MS4 and SPCC. Develop a combined MS4 / MSGP training presentation.	Annual MSGP, MS4 and SPCC training are documented and tracked.	Yes	Yes	Yes	Yes	Yes	NBG EV MS4 Compliance Contractor
		07 - Update Contractor's and Tenant's new-hire / indoctrination presentations and programs to include MS4 requirements.	ELIN D157	n/a	n/a	*	*	Yes	NBG EV MS4 Compliance Contractor
		08 - Update Government's new-hire / indoctrination presentation and programs to include MS4 requirements.	MS4 environmental awareness information incorporated into the Welcome to Guam In-brief for new military personnel.	n/a	n/a	No	Yes	Yes	NBG EV MS4 Compliance Contractor
1D	Program Effectiveness Assessment	Conduct MCM1 program Effectiveness evaluation as part of the MS4 annual Report.	Pending program implementation.	n/a	n/a	Yes	Yes	*	NBG EV MS4 Compliance Contractor

Note: * Contract awarded, requirements to be included in following reporting years

Element ID	Description of BMP	Measurable Goal(s)	MCM Status / Update	Performed / Completed?					Responsible Entity/Department
				Y1	Y2	Y3	Y4	Y5	
2A	Public Review of NBG MS4 SWMP: Post a public draft of the SWMP on NBG CNIC website and allow Base tenants to review the document and encourages them to comment and propose revision.	09 - Posting of reduced copy on NBG webpage. Update if Necessary.	Completed	n/a	n/a	Yes			NBG PAO NBG EV MS4 Compliance Contractor
		09 - Provide a point of contact for receiving proposed changes and revisions.	Completed	n/a	n/a	Yes			NBG PAO NBG EV MS4 Compliance Contractor
2B	Illicit Discharge Public Reporting Hotline: NBG will assign a hotline to facilitate tenant's reporting of illicit discharge to MS4.	See MCM 3 Element ID 3D	See MCM 3 Element ID 3D	n/a	n/a				See MCM3

2C	Signage and Logo Design: development of NBG Stormwater Signage and Logo	10 - Encourage NBG tenant's participation in the design and development of NBG Stormwater signage and logo.	Pending program implementation.	n/a	n/a	n/a	*	*	NBG PAO NBG EV DoDEA MS4 Compliance Contractor
2D	Public Participation Campaigns: Partnering with interested Base organizations and provide opportunities to these groups to participate in the SWMP BMPs implementation	11 - Encourage various sectors / units of NBG community by organizing community relations (COMREL) activities such as streets and beach clean-ups within or outside NBG's permitted area.	Pending program implementation.	n/a	n/a	n/a	*	*	NBG EV MS4 Compliance Contractor Participating Unit
		12 - Storm drain stenciling. Develop inventory of storm drains and inlets. Organized storm drain marking activities by establishing partnership with COMREL personnel of various NBG Tenants to promote stormwater pollution awareness and discourage illicit discharges.	Storm drains and inlets inventory provided in Appendix J Pending program implementation.	n/a	n/a	n/a	*	*	NBG EV MS4 Compliance Contractor Participating Unit
		13 - Community Partnerships. NBG will participate in local environmentally-related community outreach events by active presentation or setting up information kiosk. Identify and establish a list of possible partnership with local organization to widen opportunities for public outreach.	Pending program implementation.	n/a	n/a	n/a	yes	*	NFM/NBG EV MS4 Compliance Contractor Participating Unit
2E	Surveys: Design a statistically valid survey program to measure changes in public awareness and behavior resulting from implementation of the public outreach program	14 - Baseline Survey: Conduct baseline survey to gauge existing level of public awareness and behavior prior to active implementation of NBG's MS4 public education and outreach program.	Survey methodology included in the SWMP document Pending program implementation	n/a	n/a	n/a	*	*	NBG EV NBG PAO MS4 Compliance Contractor
		15 - Follow-up Survey: NBG shall conduct follow-up survey within two years of public education and outreach program implementation to assess changes in public awareness using the SWMP statistically valid survey procedure	Survey methodology included in the SWMP document Pending program implementation	n/a	n/a	n/a	n/a	*	NBG EV NBG PAO MS4 Compliance Contractor
2F	Program Effectiveness Assessment	Conduct MCM2 program Effectiveness evaluation as part of the MS4 annual Report	Included in the annual report	n/a	n/a	yes	yes	*	NBG EV MS4 Compliance Contractor

Note: * Pending award of contract

Element ID	Description of BMP	Measurable Goal(s)	MCM Status / Update	Performed / Completed?					Responsible Entity/Department
				Y1	Y2	Y3	Y4	Y5	
1A	MS4 Mapping ¹ : Develop and maintain a geo-database MS4 map of NBG. Identify outfall locations and generate information using GIS/GPS data sources. This map is updated to note any changes, if any.	16 - NBG to develop map of the area covered by the permit that identify stormwater features and facilities. Features to include stormwater inlets, outfalls and BMPs locations as well as commercial and industrial facilities. Document MS4 related features such as inlets/catch basins/drains, BMPs, facilities and other stormwater conveyances in the SWMP document.	NBG MS4 Map is part of the SWMP Development MS4 1 page map from AM completed - pending updates	n/a	n/a	Yes	Yes	Yes	NBG EV, MS4 SWMP Development contractor, NFM ArcGIS Core
		18 - Update NBG MS4 Field maps and database for any changes observed in the conveyance system (storm drains, Catch Basins, outfalls, ...) and facilities during the calendar year.	As needed, annual review	n/a	n/a	Yes	Yes	Yes	
1B	Priority Outfall Identification ¹ : Conduct outfall reconnaissance inventory to gather outfall pertinent information. Perform desktop evaluation of all permit areas to identify priority outfalls	17 - Identify priority outfalls in the SWMP document.	NBG MS4 Map is part of the SWMP Development	n/a	n/a	Yes	Yes	Yes	NBG EV MS4 SWMP Development contractor Guam EPA
		17 - Secure approval from Guam EPA for the proposed priority outfalls.	Proposed Priority Outfalls approved by Guam EPA 6/22/21 Pending revision	n/a	n/a	yes	n/a	n/a	
1C	Dry Weather Field Screening: conduct dry weather field inspections to detect illicit discharges and perform follow-up investigation if indicator benchmark levels are exceeded.	19 - Document and report the number of dry weather outfall inspections (annually for the priority outfall - 20% of remaining outfall)	Program implementation under EV1 HW IDIQ	n/a	n/a	*	*	Yes	NBG EV, MS4 Compliance Contractor
		19 - Document and report the number of outfalls with dry weather discharges	Program implementation under EV1 HW IDIQ	n/a	n/a	*	*	Yes	
		19 - Document and report field screening results and other pertinent information.	Program implementation under EV1 HW IDIQ	n/a	n/a	*	*	Yes	
		19 - Document and report follow-up investigation for benchmark exceedance.	Program implementation under EV1 HW IDIQ	n/a	n/a	*	*	*	
	Illicit Discharge Public Reporting Hotline: NBG will assign a hotline to facilitate tenant's reporting of their discharge to MS4.	20 - NBG to assign an official MS4 Illicit Discharge complaint hotline	117 / 333-4357 or NBG EV MS4 PM*	n/a	n/a				NBG EV MS4 Compliance Contractor

1D		10 - Implement existing sewer overflow and HAZMAT spill response programs.	Covered under existing EV IDIQ (Hazardous Waste and Env. Compliance) contracts	Yes	Yes	Yes	Yes	Yes	
1E	IDDE Source Investigation and Elimination: develop a program and implement a variety of tools to trace illicit discharge problems back up the pipe to isolate the specific source or improper connection that generates the discharge	21 - Document and report the number of proactive inspections and response to reported spills.	Program implementation under EV1 HW IDIQ	Yes	Yes	Yes	Yes	Yes	NBG EV, MS4 Compliance Contractor, EV IDIQ HazWaste KTR, EV IDIQ Env Compliance KTR
		21 - Document and report the number of illicit discharges identified and eliminated.	Program implementation under EV1 HW IDIQ	n/a	n/a	Yes	Yes	Yes	
		22 - Implement existing hazardous facilities inspection program	Currently covered under the EV IDIQ Contract and fully funded	Yes	Yes	Yes	Yes	Yes	
		23 - Document and report the number of illicit discharges eliminated.	Currently covered under the EV IDIQ Contract and fully funded	Yes	Yes	Yes	Yes	Yes	
3F	Program Effectiveness Assessment	Conduct MCM1 program Effectiveness evaluation as part of the MS4 annual Report	Included in the annual report	n/a	n/a	Yes	Yes	Yes	NBG EV MS4 Compliance Contractor

Note: * Pending award of contract

Element ID	Description of BMP	Measurable Goal(s)	MCM Status / Update	Performed / Completed?					Responsible Entity/Department
				Y1	Y2	Y3	Y4	Y5	
4A	Construction SW Management Policy: NBG to adopt the 2014 Comprehensive SWPPP for the Guam Military Relocation DPRI Construction Program for erosion and sediment control on new construction and redevelopment projects greater than or equal to one acre	24 - Document issuance of CSWPPP adoption policy / memorandum	PWO Memorandum dated 2/24/2020	n/a	Yes				NBG EV MCAG EV ROICC FEAD
		25 - Provide a presentation and conduct an awareness training with FEAD personnel (ET's and CME's)	Completed March 12, 2020	n/a	Yes				
4B	Site-specific SWPPP Review Process: Document the Operator's site-specific SWPPP review process and approval	26 - Adopt the 2014 DPRI CSWPPP procedure and checklist when reviewing and approving site-specific SWPPP	Covered under the Pwo Memo	N/A*					NBG EV MCAG EV ROICC FEAD
4C	Construction Site Inventory: Electronic tracking system to include a list of active construction sites and other pertinent information i.e. CGP coverage, Site-Specific SWPPP	27 - FEAD maintains an electronic (projects) construction sites inventory. FEAD informs EV which sites have greater than 1 acre of land disturbance. Document and report the number of active construction sites operating under the erosion and sedimentation control requirements of the 2014 DPRI CSWPPP	Continuous / As-required	Yes	Yes	Yes	Yes	Yes	NBG EV MCAG EV ROICC FEAD
4D	Development of Construction Site Inspection Program: Government construction representatives inspect all construction projects and enforce erosion, sedimentation, and waste controls.	28 - Adopt the 2014 DPRI Inspection procedure and checklist for active construction site inspection	PWO Memorandum dated 2/24/2020	Yes	Yes	Yes	Yes	Yes	NBG EV MCAG EV FEAD NBG EV MS4 Compliance Contractor
		29 - Conduct construction site BMP inspections for qualified active construction sites IAW MS4 Permit and DPRI CSWPPP requirements. Provide an inspection summary report including findings and non-conformances	Program implementation under EV1 HW IDIQ	Yes	Yes	Yes	Yes	Yes	

Notes: * Projects broke ground prior to issuance of MS4 permit.

Element	Description of BMP	Measurable Goal(s)	MCM Status / Update	Performed / Completed?					Responsible
4E	Construction Site Operator Education & Public Involvement: Implement a program for distribution of educational materials for construction site operators, and provide a mechanism for public to report stormwater issues regarding construction site operation.	30 - Construction site education program will be incorporated in MCM1. 150 brochure distributed and 2 posted on bulletin boards during Y2. 100 brochure distributed and 2 posted on bulletin boards during Y3.	Continuous / As-required	See Element ID 1C					NBG EV MCAG EV ROICC FEAD
		Construction site public involvement program including public reporting of illicit discharges is incorporated in MCM3	See MCM 3 Element ID 3D	n/a	n/a	Yes	Yes	Yes	
4F	Permittee Staff training: Implement a training program for NBG staff whose primary duties are related to the construction stormwater program.	31 - Develop and implement a training program for active construction site inspectors and post-construction BMP inspectors.	Continuous / As-required	n/a	Yes	Yes	Yes	Yes	NBG EV MS4 Compliance Contractor
		31 - Maintain copies of the initial and renewal training records.	Continuous / As-required	n/a	Yes	Yes	Yes	Yes	
4G	Program Effectiveness Assessment	Conduct MCM4 program Effectiveness evaluation as part of the MS4 annual Report	Included in the annual report	n/a	n/a	Yes	Yes	Yes	

Note: * Pending award of contract

Notes: * Projects broke ground prior to issuance of MS4 permit.

Element ID	Description of BMP	Measurable Goal(s)	MCM Status / Update	Performed / Completed?					Responsible Entity/Department
				Y1	Y2	Y3	Y4	Y5	
5A	Post-Construction Stormwater Management Program: Develop, implement, and enforce a program to address post-construction storm water runoff from new development and redevelopment projects IAW the 2006 CNMI and Guam Stormwater Management Manual and 2010 Guam Transportation Stormwater Drainage Manual.	31 - Adopt DPR/CSPWPPP post-construction BMP program and acceptable post construction structural BSIFs	Covered under PWO Memorandum	n/a	yes				NBG EV MCAG EV ROICC FEAD
5B	Site-Plan Review: Implement a strategy for evaluating LID projects.	33 - Adopt DPR/CSPWPPP Acceptable post construction BMPs and LID	Covered under PWO Memorandum	n/a	yes				NBG EV MCAG EV ROICC FEAD
		33 - Document "As-built" drawings and certifications and verify performance standards	As required	n/a	n/a	n/a	Yes		
5C	Post-Construction Stormwater Control Measures Inventory: Maintain an inventory of structural post-construction stormwater control measures.	34 - Develop Post-construction BMP inventory Catalog BMP conditions beginning program implementation	Provided in Appendix J Table J5 Will need annual updates	n/a	na	Yes	Yes	Yes	NBG EV MCAG EV ROICC FEAD
5D	Inspection and Enforcement: Describe inspection procedure in the SWMP Document	35 - Develop and implement a post-construction BMP program. Each BMP must be inspected and its condition catalog at least once every permit term	Inspection program describe in the SWMP	n/a	n/a	yes	yes		NBG EV MCAG EV ROICC FEAD
		35 - Develop inspection Checklist	Forms available	n/a	n/a	yes			
5E	Long-Term Maintenance: Develop and implement a maintenance and inspection program that ensures long-term effectiveness of stormwater retention / detention systems.	36 - Describe the long-term maintenance program in the SWMP document	Maintenance program describe in the SWMP	n/a	n/a	yes			NBG EV MCAG EV ROICC FEAD
		37 - Document and report the number and description of maintenance, repairs and retrofit performed.	As required	n/a	n/a	n/a	n/a		
5F	Program Effectiveness Assessment	Conduct MCMs program Effectiveness evaluation as part of the MS4 annual Report	Documented in the annual reports	n/a	n/a	Yes	Yes	Yes	NBG EV MS4 Compliance Contractor
Element ID	Description of BMP	Measurable Goal(s)	MCM Status / Update	Performed / Completed?					Responsible Entity/Department
				Y1	Y2	Y3	Y4	Y5	
6A	P2 and Good Housekeeping Program ¹ : Develop and implement an operation and maintenance program that aims to prevent and reduce pollutant runoff into the storm drainage system.	38 - Inventory and mapping of stormwater control and facilities.	Inventory provided in Tables under Appendix J	n/a	n/a	Yes			NBG EV MS4 Compliance KTR
		39 - Develop facility assessment program	Program described in the SWMP	n/a	n/a	Yes	Yes	Yes	
		40 - Implementing weekly visual inspection for HPFs	Covered under various programs.	n/a	n/a	Yes	Yes		
		41 - Implement comprehensive quarterly inspection for HPF.	Covered under various programs.	n/a	na				
6B	Catch Basin Inspection and Maintenance: NBG to implement a maintenance and repair program for the stormwater system.	42 - Implement Priority "C" Catch basin inspection	Not applicable / no catch basin found during inventory	n/a	n/a				NBG EV MS4 Compliance KTR
		43 - Implement Priority "B" Catch basin inspection	Not applicable / no catch basin found during inventory	n/a	n/a				
		44 - Implement Priority "A" Catch basin inspection	Not applicable / no catch basin found during inventory	n/a	n/a				
6C	Street Sweeping and Cleaning: Implement sweeping program for roads, streets and parking lots.	45 - Develop inventory of streets and parking lots within the permit/lot area	Provided in Appendix J	n/a	n/a	yes	yes		NBG EV MS4 Compliance KTR
		46 - Street sweeping prioritization and implementation	On-going in some locations. Will require Grounds Maintenance contract mod	yes	yes	yes	yes		
6D	Pesticide, Herbicide and Fertilizer Application Management: Evaluation of material use for grounds maintenance activities.	47 - Restrict Pesticide, Herbicide and Fertilizer application to Guam EPA certified personnel only.	Standard practice	Yes	Yes	Yes	Yes	Yes	NBG EV FSC and Contractors
		47 - Included integrated pest management measures in the grounds maintenance contract	Integrated Pest Management clause in the Grounds Maintenance Contract (Pesticide/herbicide use and certified applicators are documented on ELIN 292)	Yes	Yes	Yes	Yes	Yes	
6E	Trash Volume Monitoring: For the trash Reduction Program	48 - Monitor volume of trash collected from permitted area. Analyzed annual trend based on collected volume using graphical / statistical means.	May require contract mod to quantify trash collected within the MS4 conveyance system.	Yes	Yes	Yes	Yes	Yes	NBG EV FSC and Contractors

6F	Visible Erosion Monitoring: Requires Contractors to comply with MS4 requirements - NBG EV may respond	49 - Respond to reports of visible erosions from the public. Document response to support request for temporary or permanent corrective measures	May require mod to EV IDIQ if KTR will be required to respond and investigate report of erosions	n/a	n/a	none	none		NBG EV MS4 Compliance KTR
6G	BMP Field Manual: Development of a BMP Field Reference	50 - Develop a list of applicable BMPs that can be used within the permitted area to address any deficiency or non-conformance found during inspections, analytical monitoring and audit	Completed and provided in Appendix D Will need annual updates	n/a	n/a	Yes			NBG EV MS4 Compliance KTR
6H	Industrial / Commercial Stormwater Sources: Installation to a develop and implement a program aimed reducing pollutants discharge from Industrial / Commercial sources	51 - Develop an inventory of NBG facilities within the permitted area.	Completed and provided in Appendix J Tables J and J.1 may need updates	n/a	n/a	Yes	Yes	Yes	NBG EV MS4 Compliance KTR
		52 - Develop an inventory of commercial facilities and inspection schedule.	Completed and provided in Appendix J Tables J and J.1. may need updates	n/a	n/a	Yes	Yes	Yes	NBG EV MS4 Compliance KTR
		53 - Develop an inventory of industrial facilities and inspection schedule.	Completed and provided in Appendix J Tables J and J.1. may need updates	n/a	n/a	Yes	Yes	Yes	NBG EV MS4 Compliance KTR
		54 - MS4 Routine Industrial and Commercial Facility Inspection Procedure Update	As required	n/a	n/a	yes	n/a		NBG EV MS4 Compliance KTR

Note(s): 1 - Will be included in the SWMP Document

Element ID	Description of BMP	Measurable Goal(s)	Requirement Status / Update	Performed / Completed?					Responsible Entity/Department
				Y1	Y2	Y3	Y4	Y5	
7A	Monitoring and Assessment Program: NBG to develop a comprehensive monitoring plan.	Develop a sampling program that identifies the locations and frequency of monitoring.	Program describe in the SWMP	n/a	n/a	Yes			NBG EV MS4 Compliance KTR
		Conduct annual outfall monitoring IAW Section 3.2.2 of the MS4 permit. Provide sampling and analysis for parameters listed in Table J of the permit.	See notes	n/a	n/a	Yes*	Yes*	Yes	
		Track and report investigation TRE Plan where applicable	As required	n/a	n/a	n/a	n/a		
7B	Annual Report: Refers to permit requirements, provide description in quantifiable terms, and status of activities undertaken.	Develop an Excel-Based electronic compliance tracking system to monitor information required of the permit. Prepare and submit an annual report IAW the requirements in part 2.2 of the permit including but not limited to, a summary of past year activities, specific quantities achieved and summary of enforcement actions, where applicable, a description of effectiveness of each SWMP program component or activity; monitoring data collected during the reporting period; planned activities and changes for the next reporting period	Currently in used	yes	yes	yes			Environmental Department, MS4 Compliance Contractor
7C	Program Evaluation: NBG to assess the effectiveness of BMP's describe in the SWMP.	Use monitoring results to assess effectiveness of BMPs	Document in the annual reports	n/a	n/a	Yes	Yes	Yes	Environmental Department, Contracted Laboratory, MS4 Compliance Contractor
		Document NBG compliance with the permit conditions	Document in the annual reports	n/a	n/a	Yes	Yes	Yes	
		Review SWMP and BMPs to maximize program implementation effectiveness	Document in the annual reports	n/a	n/a	Yes	Yes	Yes	

Note: *Multiple attempts to collect sample failed due to WET analyses holding time requirements. Additionally, sampling is limited to qualifying rain events. A request was made and was approved by USEPA to adopt MSGP qualifying rain events for Guam.

APPENDIX K

MS4 Dry Weather Field Screening Benchmark DMRs

U.S. NAVAL BASE GUAM

**MS4 Dry Weather Field Screening
Discharge Monitoring Reports (DMRs)
(Permit ID: GUS040000)**

FEBRUARY 2023 - JANUARY 2024

prepared by:



N40192-21-D-1820

Appendix L1:

Bioswale Reports

Appendix L2:

GHS UIC Facility Inspection Reports

Appendix L3:

IWDCP Inspection & Monitoring Reports

Appendix L4:

MSGP Routine Inspection Reports

Appendix L5:

90-Day Storage Facility Inspection Reports

Appendix L6:

Conforming Storage Facility (CSF) Inspection Reports

Appendix L7:

Satellite Accumulation Area (SAA) Inspection Reports

Appendix L8:

Seabee's Asphalt Batch Plant Inspection Report

Appendix L9:

SPCC Inspection Reports

Appendix L10:

Stormwater Harvesting Inspection Report