DEPARTMENT OF THE NAVY
U.S. NAVAL BASE GUAM
PSC 455 BOX 152
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5090
Ser EV/161
April 22, 2025

Water Enforcement Section II (ENF-3-2)
NPDES Permit Section
USEPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

SUBJECT: NBG USEPA NPDES MS4 PERMIT NO. GUS040000 6TH ANNUAL REPORT FROM FEBRUARY 2024 – JANUARY 2025

This letter transmits the 6th annual report for the U. S. Environmental Protection Agency (USEPA) National Pollutant Discharge Elimination System (NPDES) permit number GUS040000 for Navy's Municipal Separate Storm Sewer System (MS4), located on Naval Base Guam (NBG).

This report includes details of the NBG compliance efforts from February 1, 2024 to January 31, 2025; to meet permit conditions and requirements. This includes the discharge monitoring reports, existing inspections, reporting, and record keeping requirements for all program activities to meet the permit's minimum control measures, best management practices, and stormwater conveyance maintenance activities.

My point of contact regarding this matter is Mr. Ramon J. Camacho. He may be reached by phone at (671)339-3711 or email at ramon.j.camacho.civ@us.navy.mil.

Sincerely,

Ed Moon

Ed Moon
Installation Environmental Program Director
By Direction of the Commanding Officer

Enclosure: 1. NBG 6th Annual Report for USEPA NPDES MS4 from February 2024 – January 2025

U.S. NAVAL BASE GUAM

MS4 Annual Report (Year 6)

MS4 Permit No.: GUS040000

April 2025

Prepared by:

SUNDANCE-EA ASSOCIATES II

N40192-21-D-1820

U.S. Naval Base Guam
Municipal Separate Storm Sewer System (MS4) Permit No.:
GUS040000Reporting Period: February 1, 2024 – January 31, 2025

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 6 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 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, 2024 to January 31, 2025, 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 6th 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 NBG stormwater program effectiveness evaluation 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 described 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, logistical 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 NPDES permit for discharges from 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 expired on January 24, 2024 which is the same as the original permit issued in 2018. Permit renewal was submitted by NBG to USEPA on July 2023 and permit is administratively extended.

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 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 contracts. 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 polices 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 meets 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 deliverable specified in the SWMP document and the MS4 asset maintenance cost file.

Chapter 2 of the OPNAVINST 5090.1E provides implementing policy guidance and programming resources for environmental shore compliance. NBG SWMP/ MS4 Program Managers are responsible for identifying requirements and requesting 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 described in section 2-3.4 of OPNAVINST 5090.1E.

MS4 Program Management Past Year Activities:

- NBG / NFM identified permit-based compliance activity requirements and have continued consolidating for the 6th Year NBG MS4 Annual report.
- MS4 Program implementation conducted by EV KTR based on the Environmental Compliance IDIQ Contract, N40192-21-D-1820.

MS4 Program Management Future Year Activities:

- Continue to identify SWMP-based compliance activity requirements and review existing Installation policy to determine adequacy to implement stormwater

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

- Continue to 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, 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 effects to water quality so that they can avoid performing these activities thus improving overall water quality.

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

3.1.1 Electronic Media Outreach

An electronic media outreach activity was performed during this reporting period. A detailed outreach 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
- https://jrm.cnic.navy.mil/Installations/NAVBASE-Guam/About/Departments/Environmental/MS4-Storm-Water-Management-

Program/

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 -- 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:

- A 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 all other applicable information to MS4 on the NBG and JRM websites.

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 on a semi-annual basis.
- Will include posting of informational material such as the "Best Management Practices for Privately Owned Vehicle Washing and Maintenance" brochures completed and approved on March 19, 2024 on NBG/JRM websites.

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 and refresher training program in compliance with the Multi-Sector General Permit (MSGP) and 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. Training is conducted at least annually to all personnel working in industrial / commercial

facilities within the NBG MS4 permit area (Appendix E).

The NBG Base Operation Support (BOS) contractor offers an orientation program to their newly acquired personnel. Part of the orientation is to provide a 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 MCM1. This program could be enhanced and tracked to meet the MCM1 requirements, and each session could 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.
- Conducted a number of fifteen (15) orientations / AOB training to a total seven hundred twenty-five (725) personnel during the compliance year.
- 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: CY2024 NBG Stormwater Training

Facility / Building No.:	Date	Number of Attendees
DLA Bldg. 631 Disposition Facility	10/04/2024	10
[1]Transportation Maintenance Shop Bldg. 372	08/02/2024, 10/07/2024, 10/08/2024	36
Material Handling Equipment, Bldg. 364	10/07/2024	4
[1]Transportation, Filling Station, Bldg. 374	08/02/2024, 10/07/2024, 10/08/2024	36
Alpha Compound Maintenance (Camp Covington)	08/29/2024, 10/18/2024	24
Naval Special Warfare Group One Detachment 3000-3002, 3008	10/28/2024	1
Port Operations, Bldg. 3169	09/30/2024	18
Marina Facilities, Bldg. 5406	11/15/2024	4
PACSEA Bldg.	09/30/2024	21
[1]Navy Berthing Facilities	N/A	N/A

Emergent Repair Facilities, Bldg. 4430	10/22/2024, 10/24/2024	62
AHWWTP, Bldg. 1794 1604	10/02/2024	26
Utilities and Machine Shop, Bldg. 1793	09/27/2024	29
US Navy Sanitary Landfill	10/11/2024	13
Naval Hospital Compound	*	*
U.S. Navy Water Treatment Plant	10/03/2024	15
U.S. Navy Laboratory	08/06/2024	6
MWR Auto Hobby Shop	08/27/2024	1
[1]USCG Apra Harbor	10/08/2024	32
[1]USCG Guam Sector	10/08/2024	32
[1]Ordnance Annex	12/30/2024	68
[1]Kilo Wharf Compound 1802-1803	12/30/2024	68
Medical Dental Center, 1780	09/19/2024	8
Total Number of Personnel Trained:		**378**

Source: Environmental Compliance IDIQ N40192-21-D-1820
Notes:
* Annual training not conducted
[1] Annual training conducted with other listed facilities

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.
- Continue to include MS4 permit and SWMP requirements in existing SPCC and SWP2 training materials.
- 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 the Office of Personnel Management (OPM) and NBG Housing to include MS4 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:

- MS4 educational materials were distributed to target audiences and tracked during the compliance year to include topic and quantity of distributed materials. The following number of distributed materials are as follows:
    - Getting to Know Stormwater: 50
    - Getting to Know Your Drainage System: 20
    - Getting to Know Illicit Discharge: 20
    - Importance of Reducing Trash Waste: 50
    - Why is Water Quality Important?: 20
    - Best Management Practices for Privately Owned Vehicle Washing and Maintenance: 20
    - Importance of Erosion and Sediment Control on Construction Sites: 150
    - Tips to Prevent Stormwater Pollution: 100
- The Joint Region Marianas (JRM) webpage features posted MS4 educational materials and is openly accessible to the general public.
- Developed and distributed educational materials such as posters and flyers, designed specifically for school children, to McCool Middle School and Guam High School for posting on school premises.
- Distributed copies of stormwater educational materials to construction site operators. Quantities of distributed materials were tracked for the compliance year. A total of
- Distributed informational materials at the base's NEX Food Court on April 22, 2024 for World Earth Day.

Future Year Activities:

- NBG will continue to 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, will include topic and quantity distributed to target audiences.
- Continue to distribute copies of stormwater educational materials to newly assigned construction site project / 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.

- Continue to 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.

- Continue to modify existing Environmental Compliance contract or provide an alternate contract mechanism to include MS4 distribution and tracking of MS4 informational materials.

3.1.4 Survey

The performance of a statistically valid survey was part of the SWMP development contract and was conducted during this compliance year. 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:

- Designed and developed a statistically valid survey as stated in the SWMP document. The survey program, intended to assess changes in public awareness and behavior resulting from the implementation of the public outreach program, was distributed to target audiences on April 22, 2024 and closed on May 31, 2024. According to results obtained from the baseline survey, the number of individuals that responded included only forty-eight (48). It was previously estimated that to have a statistically valid survey (with a 90% confidence level and based on a potential survey population of 5,500 people, at least 258 responses were needed. In conclusion, the results of the survey cannot be considered statistically valid.

- After one (1) year of public education and outreach program implementation, the SWMP statistically valid was conducted from December 30, 2024, through January 31, 2025, to assess changes in public awareness. According to results obtained from the follow-up survey, the number of individuals responding to the survey included only sixty-seven (67) people. It was estimated that to have a statistically valid survey (with a 90% confidence level and based on a potential survey population of 5,500 people), there needed to be at least 258 responses to the survey. In conclusion, the results of this survey cannot be considered statistically valid.

Future Year Activities:

- Improve the development of a statistically valid survey as stated in the SWMP document, to assess changes in public awareness and behavior resulting from implementation of the public outreach program for every compliance year

- Amend the baseline / follow-up survey questions and explore other ways to obtain more responses from the target audiences.

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 of 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://jrm.cnic.navy.mil/installations/NAVBASE-Guam/About/Departments/Environmental

Past Year Activities:

- 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 feedback were received from the community.

- Point of contact for receiving proposed changes and revisions of the MS4 SWMP to be NBG PWD Environmental.

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/jrm/installations/navbase_guam/
- https://jrm.cnic.navy.mil/installations/NAVBASE-Guam/About/Departments/Environmental

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 are not limited to trash pick-up, beach clean-ups, and storm drain marking.

Past Year Activities:

- First Class Petty Officers from Commander, Task Force 75 (CTF 75) and U.S. Naval Base Guam volunteered as part of a beautification project at the World War II Memorial onboard NBG on March 25-29, 2024.

- The U.S. Naval Base Guam Chief Petty Officers Association (CPOA) and First-Class Petty Officers Association (FCPOA) partnered up for a clean-up at Reserve Craft Beach in Piti on April 19, 2024.

- Sailors from U.S. Naval Base Guam (NBG), U.S. Naval Hospital Guam, and Commander Task Force 75, joined civilian volunteers from the American Red Cross and AmeriCorps as part of a beautification project at the Guam Veterans Cemetery in Piti on May 18, 2024. Volunteers assisted with cleaning and repainting.

- Naval Base Guam Environmental along with contractor Sundance-EA Associates II held an MS4 Stormwater informational table at the NEX Food Court in observance of World Earth Day on April 22, 2024. Educational materials on stormwater and pollution prevention were distributed during the event.

- Military and civilian personnel partnered with multiple tenant commands to assist with clean-up efforts at Southern High School (SHS) in Santa Rita on September 12, 2024.

- Fifty military and civilian personnel, family members, and NBG residents participated in the Guam International Coastal Clean-Up along Dadi Beach and near the NBG Back Gate on September 21, 2024. The annual coastal cleanup was a combined effort by the local government, businesses, and non-profit organizations to protect and maintain the environmental condition of Guam's coastline.

- A slogan and logo design contest opened to all students from Guam High School and McCool Middle School 6th – 8th grade on November 04 through November 18, 2024. The purpose of this contest was to spread awareness about stormwater and involve students in pollution prevention. The winning artworks were stenciled onto NBG's storm drain curb inlets.

- Sailors from Maritime Expeditionary Security Group ONE (MESG-1) Detachment Guam volunteered for a clean-up at the historic Sumay Cemetery onboard NBG on November 01, 2024. Volunteers cleared the cemetery of debris.

- Personnel with NBG's Environmental Department and contractor Sundance-EA, along with students from William C. McCool Middle school painted a school bus stop in the village of Santa Rita-Sumai on January 25, 2025. The event was designed to promote greater understanding of stormwater pollution prevention through hands-on activities.

- NBG's Environmental Department and contractor Sundance-EA held school outreach events at Guam High School and McCool Middle School during lunchtime on October 29, October 30, and November 01, 2024. The event featured a table with educational materials about stormwater pollution and were distributed to students. The event aimed to raise awareness among students about the impacts of stormwater pollution.

Future Year Activities:

- Continue to 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.

- Continue to participate in World Earth Day by setting up an informational kiosk at NBG Main NEX from 10 am through 4 pm. Contractor Sundance-EA to use existing informational materials for display and distribution.

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 outline 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 well 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. No further update on these maps for CY 2024.

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 dumpling 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:

- On April 22, 2024, five (5) outfalls representative of land use were updated under the sampling and monitoring program as required by Section 5.2.2.1 of the MS4 Permit.
- Pending submission of the SWMP update, priority outfalls to be inspected for dry weather annually were included in Appendix J1 of the SWMP update based the criteria listed on Section 3.3.3 Identification of Priority Outfalls.

Future Year Activities:

- Continue to review and update the priority outfall list when necessary to reflect changes in the MS4.

- Continue to 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, dry weather inspections are to be conducted for outfalls listed on the SWMP document that indicates annual frequency.

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 fourteen (14) priority outfalls and sixty-four (64) non-priority outfalls. No illicit discharges were observed during dry weather field screening (Appendix F).

Future Year Activities:

- Continue to conduct dry weather inspection on outfalls listed on the SWMP document that indicates annual frequency (priority outfalls).
- 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 completed the update of its SPCC Plan and the accompanying Facility Response Plan in CY 2024. 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 an 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:

- Continue to review and 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 require 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 CY2024 Spill Response Activities

Type of Response	Permit Area / Quantity				
	NBG Apra Harbor	Apra View / Palms	Nimitz Hill	NBG MS	Naval Hospital
HW/HS Spill	32	1	1	0	0
Sewer Spill	6	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:

- April 15, 2024: USS Emory S. Land was discharging into Romeo Wharf CHT 3 when a hose connection camlock from the ship to CHT 3 riser disengaged. This caused approximately 400 gallons of raw sewage / graywater to spill onto Romeo Wharf and the waters of Inner Apra Harbor for 30 minutes. Departing vessels and all parties were notified of the incident of the incident and made aware of procedures before departure. The area was disinfected with sodium hypochlorite solution by Unitek Environmental on April 15, 2024 from 1439 – 1830H.

- April 27, 2024: Fuel Farm personnel were setting up to deliver fuel to the USS Halsey. Upon arrival to the ship, Fuel Farm observed approximately 100 gallons of graywater discharging from the collection holding tank (CHT) on the port side of the ship and into the waters of Apra Harbor for about 10 minutes. The cause of the spill is currently unknown. The area was secured with a containment boom

however, discharge immediately dissipated upon entering the water. Vessels and all parties were notified and made aware of procedures before departure.

- June 14, 2024: Wastewater discharge of approximately 5 gallons from a leaking pipe originating from the restroom facility of Echo Wharf entered the waters of Apra Harbor. No ships were present at the time of the spill. Wastewater maintenance personnel arrived at the wharf to repair the damaged pipe and disinfect the site.

- June 18, 2024: Sewage spill of approximately 55 gallons from the riser connected to USNS Matthew Perry on X-Ray Wharf and into the berm prompting the ship to immediately stop pumping. Wastewater personnel arrived on the wharf and repaired the leak. It was confirmed the spill was caused by a faulty cam cap on the Riser X/CHT/SEWER-3.

- July 25, 2024: Wastewater hose line near the sanitary tank connection on the USS Asherville ruptured during an attempt to pressurize the system causing approximately 5 gallons of greywater to spill into the waters of Inner Apra Harbor for about a minute. The area was secured with an oil boom; however, the greywater immediately dissipated upon entering the water. DZSP Wastewater provided a new hose to the USS Asheville and no issues were observed upon system pressurization.

- September 9, 2024: Onboard the USCGC Fredrick Hatch ship, a greywater spill of approximately 500 gallons entered the waters of Inner Apra Harbor. Machinery technician had conducted a training inside the ship; however, the ship was not connected to a CHT hose which typically connects to the CHT riser. Despite the presence of oil booms around the ship designed to contain any possible spills, the greywater dispersed into the harbor. The crew used freshwater to clean the spilled greywater from both the ship and surrounding waters.

- 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 six (6) 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.

- Mike / November wharves repair is currently on-going. Project entails repairing and modernization of Mike / November wharves and associated facilities.

- J-609 Apra Embarkation Facility is currently on-going. Project is intended for an embarkation and debarkation facility as well as off-site road improvements and closure of 3 (three) existing abandoned groundwater monitoring wells.

- GM23-831 Unimproved Construction Access Road is currently on-going. Project entails to construct an unimproved gravel road in support of future construction MILCONs at Polaris Point.

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 six (6) 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 six (6) 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 described 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 six (6) construction site projects that disturb lands greater than 1 acre in total area. Initial inspections conducted were consistent with CGP requirements, and consistent with the MS4 permit / 2014 DPRI CWSPPP requirements. A summary of CY 2024 construction site inspections is provided in Table 4 below:

Table 4: Summary of Construction Site Inspections

Project Site	Inspection Date CY2024			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
P-669 1MW Solar Array	03/28/2024	06/07/2024	09/09/2024	11/14/2024
Lima Wharf Repair	03/27/2024	06/10/2024	09/05/2024	11/05/2024
P-519 X-Ray Wharf Repair	03/21/2024	05/13/2024	08/23/2024	11/26/2024
Mike / November Wharves Repair	03/27/2024	06/10/2024	09/05/2024	11/05/2024
J-609 Apra Embarkation Facility	03/21/2024	06/04/2024	08/22/2024	11/14/2024
GM23-831 Unimproved Construction Access Road	*	*	*	11/20/2024

Notes: *Construction project not on-going for the quarter

Past Year Activities:

- A total of twenty-one (21) quarterly Construction Site inspections were conducted in CY2024. Findings and non-conformances were submitted 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 CSWPPP 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. The 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.

- Three (3) personnel from Environmental Compliance IDIQ contractor completed the USEPA Construction Site Inspection Course in 2024.

Future Year Activities:

- NBG will continue to coordinate with FEAD and MCBCB CME Supervisor to ensure CMEs and ETs are provided with 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 opportunities 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:

- A 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 in the 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 sites 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 IAW 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 is described 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.

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 six (6) 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:

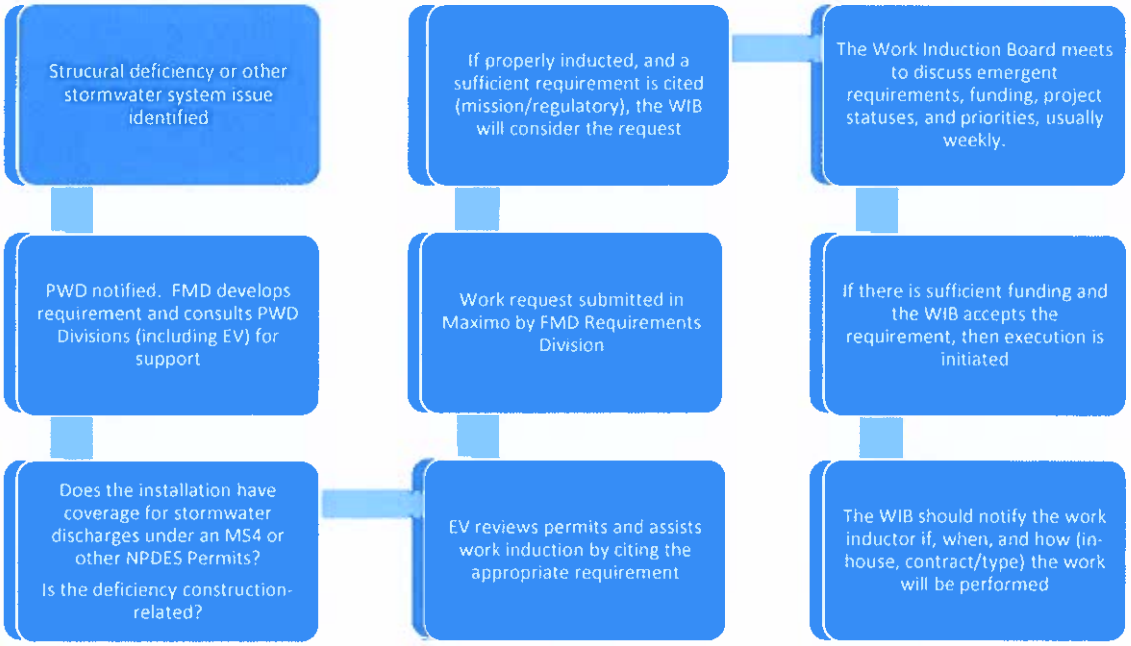
- Continue to implement the post-construction BMP operations and maintenance program as described in the SWMP document.

- 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 described 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 NBGs storm water sewer system follows 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

The development and mapping of the 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 have 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 2024 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	2/26/2024	6/7/2024	9/3/2024	10/21/2024
Transportation Maintenance Shop, Bldg. 372	3/6/2024	6/7/2024	9/9/2024	11/14/2024
Material Handling Equipment, Bldg.364	3/6/2024	6/7/2024	9/9/2024	11/14/2024
Filling Station, Bldg. 374	3/6/2024	5/9/2024	9/10/2024	12/31/2024
Alpha Compound, Camp Covington,Bldg. 557 A-C, 561, 562, 563, 571, & 578	3/18/2024	6/7/2024	8/29/2024	10/21/2024
Naval Special Warfare Group One Detachment 3000-3002, 3008	2/22/2024	5/6/2024	9/5/2024	11/14/2024
Port Operations, Bldg. 3169	3/18/2024	5/28/2024	9/20/2024	11/7/2024
Kilo Wharf Compound 1802-1803	3/21/2024	6/10/2024	9/20/2024	12/16/2024
Marina Facilities, Bldg. 5406	3/22/2024	6/10/2024	9/20/2024	12/13/2024
PACSEA Bldg. 3169	3/18/2024	5/28/2024	9/20/2024	11/7/2024
Navy Berthing Facilities: (Alpha, Bravo, Delta, Echo Romeo, Sierra, Tango, Uniform, Victor, X-ray)	3/18/2024	5/28/2024	9/20/2024	10/21/2024
US Coast Guard Station, Apra Harbor	2/22/2024	5/6/2024	9/20/2024	11/26/2024
US Coast Guard, Guam Sector Bldg.3, 3A, K-Span	2/22/2024	6/7/2024	8/28/2024	11/26/2024
Emergent Repair Facility, Bldg. 4430,Site III	2/22/2024	5/16/2024	9/4/2024	12/17/2024
Apra Harbor Wastewater TreatmentPlant, Bldg1794- 1809	2/14/2024	5/22/2024	8/15/2024	10/21/2024
Bldg. 1793 A/B Utilities & MachineShop	3/6/2024	5/9/2024	9/20/2024	10/21/2024
US Navy Sanitary Landfill	2/26/2024	5/2/2024	8/13/2024	10/21/2024
Seabee's Asphalt Batch Plant	3/28/2024	5/13/2024	9/9/2024	11/20/2024
Fleet Logistic Center Yokosuka, Guam Storage Tanks S-1 to S-5	2/7/2024	4/17/2024	9/10/2024	12/10/2024
Fleet Logistic Center Yokosuka, Guam Oil & Wastewater Storage Tanks L-1 and H-2	2/7/2024	4/17/2024	9/10/2024	10/21/2024
Fleet Logistic Center Yokosuka, Guam Field Maintenance Shop Bldg. 1704	2/7/2024	4/17/2024	9/10/2024	12/10/2024
Fleet Logistic Center Yokosuka, Guam Sludge Storage Tanks ST-32	2/22/2024	4/17/2024	9/10/2024	11/7/2024
*Filling Station, Bldg. 374	N/A	N/A	N/A	01/29/2025

*Transportation Maintenance Facility Complex – Vehicle Maintenance Facility, Bldg. 372	N/A	N/A	N/A	01/29/2025

Source: Environmental Compliance IDIQ N40192-21-D-1820 - MSGP Facility Inspection Report
Note: *Additional Inspection for High Priority Facilities

Twenty-two (22) facilities located within the MS4 permitted area were visited at least once per quarter for good housekeeping and industrial outfall inspection. A total of eighty-eight (88) inspections were conducted during this reporting period. Table 6 below provides a summary of the CY2024 inspection findings:

Table 6: CY2024 Inspection Summary

Inspection Period	Findings / Deficiency	Inspection Comments
1st Quarter	Nineteen (19) Housekeeping / BMPs Two (2) Active Minor Oil Leaks Six (6) Minor Oil Stains	Inspection report provided to NBG EV with recommended corrective actions
2nd Quarter	Eighteen (18) Housekeeping / BMPs Seven (7) Minor – Moderate Oil Stains One (1) Minor Oil Leak	IEPD for immediate action. Corrective measure documented in the original Environmental Compliance reports.
3rd Quarter	Twenty (20) Housekeeping / BMPs Three (3) Minor – Moderate Oil Spills Six (6) Minor – Moderate Oil Stains	
4th Quarter	Eighteen (18) Housekeeping / BMPs Seven (7) Minor – Moderate Oil Stains Two (2) Minor – Moderate Oil Leaks One (1) Outfall CC1 observed with suds	

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 twenty-four (24) 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 Tipalao		
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 undera 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 areclear 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 described under Section 3.6 of this report. A 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 AHWWTP 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 AHWWTP 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 is 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 2024-2025 Industrial / Commercial Facility Inventory and Inspection

Facility ID		Date Inspected			
Building Name	Bldg. No.	2nd QTR	3rd QTR	4th QTR	1st QTR
X-ray BOWTS	791XR	02/13/2024	04/23/2024	08/20/2024	10/17/2024
US Coast Guard Sector Guam	1, 2, 3, 5	03/14/2024	06/06/2024	08/28/2024	11/06/2024
MWR Torpedoes and Tomahawks	75	03/19/2024	04/22/2024	08/22/2024	11/12/2024
NEX Car Care Center	257	02/02/2024	04/23/2024	08/22/2024	11/12/2024
NEX Food Court	258	02/05/2024	04/22/2024	08/22/2024	11/12/2024
Orote Commissary	275	03/01/2024	04/22/2024	09/09/2024	11/14/2024
Wendy's	282	02/05/2024	04/22/2024	09/09/2024	12/05/2024
McCool Elementary/Middle School	311	03/19/2024	04/22/2024	09/03/2024	11/12/2024
Transportation Forklift Maintenance Shop	364	03/06/2024	06/07/2024	09/03/2024	11/14/2024
Transportation Vehicle Wash Rack	364A	03/06/2024	06/07/2024	09/09/2024	11/14/2024
Transportation Car Wash Station	375	03/19/2024	06/07/2024	09/09/2024	11/14/2024
Alpha Compound Heavy Vehicle Maintenance Shop	557A-C	02/05/2024	06/07/2024	09/03/2024	11/06/2024
Alpha Compound Vehicle Wash Rack	563	02/05/2024	06/07/2024	09/02/2024	11/06/2024
Navy Water Treatment Plant	576, 580, 597	02/02/2024	05/10/2024	08/23/2024	11/12/2024
US Navy Laboratory	585, 585A	03/18/2024	05/10/2024	08/23/2024	11/12/2024
Camp Covington Enlisted Dining Facility (Galley)	586	03/18/2024	04/22/2024	08/22/2024	11/12/2024
Camp Covington Boiler	586A	01/18/2024	04/22/2024	08/22/2024	11/12/2024

*US Navy Dental Clinic	1				
MWR Auto Hobby Shop	1982A	03/01/2024	05/10/2024	08/23/2024	11/15/2024
NEX Laundromat	1988	01/30/2024	04/22/2024	08/29/2024	11/14/2024
Sierra Wharf BOWTS	1999	01/11/2024	04/23/2024	08/20/2024	10/17/2024
Orote Power Lanes	600	03/19/2024	04/22/2024	08/22/2024	12/26/2024
Fuel Farm Skim Pit	1706A	02/07/2024	05/10/2024	08/22/2024	11/15/2024
EODMU5	2105, 2108, 2109, 2112, 2113	03/14/2024	06/07/2024	08/28/2024	12/17/2024
Polaris Point Boiler	4451	01/18/2024	05/10/2024	09/03/2024	11/07/2024
Demineralization Plant	4907	03/01/2024	05/09/2024	09/06/2024	11/07/2024
Victor Wharf BOWTS	CNRVW	01/11/2024	04/23/2024	08/20/2024	10/17/2024
Sierra Wharf Package Boiler	PB-4	03/15/2024	04/22/2024	08/20/2024	10/17/2024
Uniform Wharf Package Boiler	PB-5	01/05/2024	04/22/2024	09/02/2024	11/07/2024
Naval Special Warfare Group One Detachment	3000-3002, 3008	03/14/2024	05/06/2024	08/29/2024	11/14/2024
Steam Air Water Plant (Victor Wharf Boiler)	6025	01/18/2024	04/18/2024	08/20/2024	10/17/2024
Polaris Point BOWTS	CNRAF	01/11/2024	06/26/2024	09/03/2024	11/07/2024

Source: Environmental Compliance IWDCP Quarterly Report
Note: * Facility is currently not permitted under the IWDCP program

Thirty-one (31) 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 is 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 6th 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 6th 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 waste load allocation (WLA)-based effluent limitations described 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:

- Implemented the NBG MS4 monitoring program.
- On April 22, 2024, five (5) outfalls representative of land use were updated under the sampling and monitoring program as required by Section 5.2.2.1 of the MS4 Permit.
- On May 24, 2024, MS4 outfalls IH4 (Manhole), I447 Inlet, and NEX (manhole) samples were collected for Quarterly Enterococcus. Laboratory analytical report

received on May 28, 2024 indicated test exceedance for the listed parameter and an exceedance investigation was conducted on June 11, 2024. All other outfalls and additional parameters listed on Table 3 Monitoring Requirements of section 5.2.2.2 of the MS4 Permit were not sampled due to insufficient flow for sampling collection.

- On July 30, 2024, quarterly Enterococcus sample was collected for outfall I447 Inlet. Laboratory analytical report received on August 01, 2024, indicated test exceedance for the listed parameter and an exceedance investigation was conducted on August 06, 2024. All other outfalls and additional parameters listed on Table 3 Monitoring Requirements of section 5.2.2.2 of the MS4 Permit were not sampled due to insufficient flow for sampling collection.

- On September 5, 2024, quarterly Enterococcus samples were collected from outfalls NVCC1, P1158 Culvert, IH4 (Manhole), and NEX3 (Manhole). Laboratory analytical report received on September 09, 2024, indicated test exceedance for the listed parameter and exceedance investigations were conducted on September 10 through September 11, 2024.

- On October 11, 2024, quarterly Enterococcus sample was collected for outfall I447 Inlet. Laboratory analytical report received on October 14, 2024, indicated test exceedance for the listed parameter and an exceedance investigation was conducted on October 14, 2024.

- On October 14, 2024, stormwater samples were collected for outfalls I447 Inlet and NEX3 (Manhole) and analyzed for listed parameters in Table 3 Monitoring Requirements of Section 5.2.2.2 of the MS4 Permit. Laboratory analytical reports received on October 24 and November 14, 2024 indicated Enterococcus and E.coli levels exceeded the 2001 Guam Water Quality Standards (GAR FEPA, Dvision II – Water Control, Chapter 5) for M-2 areas. Additionally, chronic toxicity (WET) testing resulted in a "Fail" according to the US EPA Test of Significant Toxicity analysis for the urchin fertilization endpoint for outfall I447 Inlet. Exceedance investigations were conducted on November 15, 2024. Corrective actions from facility personnel were conducted on December 02, 2024. All other outfalls and additional parameters listed on Table 3 Monitoring Requirements of section 5.2.2.2 of the MS4 Permit were not sampled due to insufficient flow for sampling collection.

- Exceedance investigation reports are found on Appendix M.

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 and sampling for some outfalls were conducted however, sampling for remaining outfalls were not completed although attempted due to insufficient flow for sampling observed upon arrival. Additionally, several contributing factors included MS4 sampling only conducted on Monday and Tuesday and dependent on qualifying dry weather.

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 6 Annual Report

This Year 6 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.cnic.navy.mil/Guam/
- http://www.cnic.navy.mil/regions/jrm/installations/navbase_guam/
- https://jrm.cnic.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 6 Fiscal Analysis

Appendix A:
NBG MS4 Permitted Facilities Overview

STORM WATER
MS4 AREAS

Date: 9/6/2022

FOR OFFICIAL USE ONLY

LEGEND:

- Inlet
- Junction
- Outfalls
- Sheet Flow Point Source
- Swale
- Pipe Culvert
- Main Road
- Ponding Basin
- Road/Parking/Other Paved
- Building/Structure
- Navigable Waters
- MS4 Areas
- Installation Area

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	Three years after EDOP	01-Feb-2022	4
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	Four years after EDOP	01-Feb-2023	5
Part 5.4.1	Submit annual report	90 days after each reporting period		
Appendix B, Section 1	Permit reapplication	Within 6 months of permit expiration		
Parts 3.6.12.1.6 and 3.6.12.3	Compliance with trash reduction requirements	As soon as practicable but not to exceed 15 years from development of plan		
Parts 4.1.1	Compliance with TMDL requirements	As soon as practicable (if permit is modified to add a compliance schedule)		

Appendix C:

NBG Environmental Policy Statement

DEPARTMENT OF THE NAVY
U.S. NAVAL BASE GUAM
PSC 455 BOX 152
FPO AP 96540-1000

5090
Ser N00/0855
17 Oct 18

From: Commanding Officer, U.S. Naval Base Guam
To: Distribution

Subj: ENVIRONMENTAL POLICY STATEMENT

Ref: (a) CNO Memo 5090 Ser N451G / 1U595831 of 06 Dec 01
(b) OPNAV M-5090.1D Environmental Readiness Program Manual of 10 Jan 14
(c) ISO 14001:2015, Environmental Management Systems Guidance of 15 Sept 15
(d) ISO 14004:2004, EMS General Guidelines on Principles, Systems, and Support Techniques of 15 Nov 04
(e) CNO Policy Letter 5090 Ser N451 / N5U9011245 of 08 Mar 05

1. U.S. Naval Base Guam (NBG) is committed to the development, implementation, and management of an Environmental Management System (EMS) for activities under its responsibility that will:

a. Meet the environmental goals of the Navy.

b. Help maintain agreements between NBG and the Government of Guam related to environmental compliance and stewardship.

c. Provide direction to NBG departments and tenant commands that allow them to fulfill mission requirements while preserving, protecting, and improving current and future environmental conditions in their AOR and the surrounding areas in a professional and cost effective manner.

2. NBG supports the Navy policy for planning and implementing a comprehensive EMS that will achieve full compliance with relevant environmental legislation, regulations, standards, and policy per reference (a).

3. NBG will commit to environmental compliance, prevention of pollution and continual improvement in EMS performance. Furthermore, this policy must be communicated to organization personnel and made available to the public per reference (b).

4. NBG remains committed to ISO 14001:2015 as the EMS framework and will be compliant to an EMS that conforms to ISO 14001:2015 per references (c) and (d). NBG adopts ISO 14001:2015 for the purpose of using best-in-class business practices to enhance NBG's overall mission performance per reference (e).

5. NBG supports EMS as a complete management system that encompasses all Navy missions within the NBG fence line to assess the impact that

every Sailor and civilian has on the environment while performing their daily duties. The EMS goes beyond compliance because strategic objectives are continually developed, implemented and revisited with the ultimate goal of ensuring compliance, preventing pollution, and reducing the risk/costs while accomplishing our missions.

6. NBG recognizes EMS as a formal framework to help organizations improve environmental performance with a primary focus on the Navy mission. By committing to the EMS process, NBG will achieve and sustain environmental goals through a cycle of continual improvement.

7. The Environmental Division and Public Works Department will serve as the EMS proponent for all commands on NBG. My point of contact is Mr. Edward Moon, who can be reached at 339-4100/8203, or by e-mail at edward.moon@fe.navy.mil.

J. M. GRIMES

Distribution:
All HANDS
ALL TENANT COMMAND

Appendix D:

NBG MS4 Fiscal Analysis Report (Year 6)

Appendix E:
Annual Training Rosters, CY2024

Appendix F:
Dry Weather Screening Reports, CY2024

Appendix G:

IDDE Findings/Corrective Actions & SSO Reports

U.S. NAVAL BASE GUAM

Sanitary Sewer Overflows Report
NPDES GU0110019

CY2024

prepared by:

SUNDANCE-EA ASSOCIATES II

N40192-21-D-1820

U.S. Naval Base Guam

Sanitary Sewer Overflows Report
NPDES Permit No. GU0110019
Calendar Year 2024

Code	Incident Date & Time	Point of Contact	Sundance - EA EV Compliance Responder	Description & Location of Source	Volume Released	Duration of Release	Nearest Body of Water	NBG Notification	Cause of the Spill	Corrective Actions
	No spills reported in January									
	No spills reported in February									
	No spills reported in March									
R	4/15/2024 1030H-1100H	Lt. JG Michael J. Bartha – Commanding Duty Officer	Heath Indalecio	Collection Holding Tank (CHT) riser 3 Romeo Wharf	~ 400 gallons	~ 30 minutes	Apra Harbor	R. Camacho J. Cruz	USS Emory S. Land was discharging into Romeo Wharf CHT 3 when then hose connection camlock from the ship to CHT 3 riser disengaged. This caused raw sewage/ graywater to spill onto Romeo Wharf and into the waters of Inner Apra Harbor	Departing vessels and all parties were notified of the incident and were made aware of procedures before departing. The area was disinfected with sodium hypochlorite solution by Unitek Environmental on April 15, 2024, from 1430 – 1830H.
R	4/27/2024 Approximately 0943-0953H	USS Halsey	Romeo A. Teodosio II	Port side Collection Holding Tank (CHT) on the USS Halsey	~ 100 gallons	~ 10 minutes	Apra Harbor	R. Camacho	The cause of the spill is currently unknown.	The discharge stopped after about 5 minutes of Port Operations being informed. The area was secured with a containment boom, however, discharge immediately dissipated upon entering water. Departing vessels and all parties were notified of the incident and were made aware of procedures before departing.
	No spills reported in May									
R	6/14/2024 Approximately 0810-1345H	Apra Harbor Wastewater Treatment Plant	Carlo Unpingco– NBG Environmental	A broken wastewater pipe originated from the restroom on Echo Wharf	~ 5 gallons	~5hours and 35 minutes	Apra Harbor	J. Cruz	The spill was caused by a break in the wastewater pipe, due to wear and tear. This caused raw sewage to enter the waters of Inner Apra Harbor.	The restroom facility was secured, and wastewater maintenance personnel repaired the pipe by attaching a clamp to secure the pipe connection. They then disinfected the site using Simple Green®, which was completed at 1630H.
R	Approximately 0630H on 06/17/2024 – 0530H on 06/18/2024	Captain Alexis Callahan–USNS Mathew Perry	Lovanelijah A. Santos	Collection Holding Tank (CHT) riser 3 X-ray Wharf	~55 gallons	~23 hours	Apra Harbor	J. Cruz	USNS Mathew Perry was discharging into X-ray Wharf CHT 3 dual riser when the weathered cam cap began leaking. A mixture of greywater and rainwater filled the CHT riser berm and spilled into the waters of Inner Apra Harbor.	The ship immediately stopped pumping after noticing the leak at 0530H on 6/18/2024. Annex 1604 wastewater personnel arrived on site and repaired the leak by replacing the cam cap on the riser at 0730H. They then pumped out the greywater/rainwater from the berm and disinfected the site using bleach and Simple Green ® at 0745H.
R	7/25/2024 0825H-0824H	MasterChief Justin Urso – USS Asheville	Lovanelijah A. Santos	Wastewater hose line near USS Asheville sanitary tank connection	~5 gallons	~1 minute	Apra Harbor	J. Cruz R. Camacho	Wastewater hose line near the sanitary tank connection on the USS Asheville ruptured during attempt to pressurize the system. This caused greywater to spill into the waters of Inner Apra Harbor.	The ship immediately depressurized the system upon rupturing of the hose line. The area was secured with an oil boom, however, the greywater immediately dissipated upon entering the water. DZSP Wastewater provided a new hose to the USS Asheville and no issues were observed upon system pressurization.
	No spills reported in August									
R	9/9/2024 1800H-1804H	Joseph Mendiola USCGC Fredrick Hatch	Lovanelijah A. Santos	Onboard the USCGC Fredrick Hatch ship at greywater pump connection at Victor Wharf	~500 gallons	~4 minutes	Apra Harbor	J. Cruz	The ship's greywater pump was turned on when the shore tie (CHT hose) was not connected. This caused greywater to spill onto the ship and into the waters of Inner Apra Harbor.	The ship immediately stopped tank pumping and contained the spill in the water with an oil boom. The greywater eventually dissipated. Mr. Mendiola utilized fresh water to clean the spill from both the ship and the surrounding waters. Mr. Mendiola plans to implement additional crew training to ensure that all lines and components are thoroughly checked before any tank pumping begins.
	No spills reported in October									
	No spills reported in November									
	No spills reported in December									

Notes:

- R - Reportable
- NR - Non-reportable

Prepared by Sundance -EA Associates II
for Naval Facilities Engineering Command Mariana

Appendix H:
PWD Memorandum to FEAD

24 Feb 20

MEMORANDUM

From: Public Works Officer, U.S. Naval Base Guam
To: Director, Facilities Engineering and Acquisition Division, U.S. Naval Base Guam

Subj: NAVY'S MUNICIPAL SEPARATE STORM SEWER SYSTEM

Ref: (a) Clean Water Act (CWA, 33 USC §1251 and 40 CFR § 122 subpart B.
(b) Energy Independence and Security Act, 42 USC §17094, Section 438.
(c) Naval Base Guam (NBG) Municipal Separate Storm Sewer System (MS4) Authorization to Discharge under National Pollutant Discharge Elimination System (NPDES) Permit Number GUS040000
(d) Comprehensive Construction Stormwater Pollution Prevention Plan (SWPPP) for the Guam Military Relocation DPRI Construction Program, November 2014 (Comprehensive SWPPP)
(e) CNMI and Guam Stormwater Management Manual, October 2006

1. PURPOSE. Inform and clarify Public Works Department construction management staff on the requirements and expectations of monitoring contractor's stormwater control measures and use of Best Management Practices (BMPs) as U.S. Naval Base Guam (NBG) transitions to a Municipal Separate Storm Sewer System (MS4) permit as outlined in references (a) through (e).

2. BACKGROUND. Installation storm water discharges from construction activities one acre or more are regulated under NPDES permit GUS040000. To protect water quality, NBG is required to maintain a storm water management program and implement BMPs to reduce the discharge of pollutants from construction activities to the "maximum extent practicable".

3. ACTIONS.

a. Your staff are to hold our contractors accountable to the applicable specifications within their contracts:

i. Construction Site Runoff Control. Contractor must select, install, implement, and maintain stormwater control measures and BMPs, including Low Impact Development Integrated Management Practice, that are consistent with the Comprehensive SWPPP template in accordance with NPDES permit GUS040000 for any affected new development and redevelopment activity; where applicable.

ii. Stormwater Pollution Prevention Plan (SWPPP) Review and Acceptance. Contractor must submit a SWPPP specific to their project. Review of the SWPPP must be documented to verify contents and planning information are consistent with the Comprehensive SWPPP template.

iii. Training. Contractor must maintain training records of personnel, including sub-contractors, conducting construction site stormwater control measures and BMPs inspections.

b. Construction Sites Inventory. Inform the Environmental Division of all sites that contain land disturbance of greater than one acre. The Environmental Division will maintain an electronic tracking system of all active construction sites that have land disturbance greater than one acre.

c. Construction Site Inspections. Site inspections must be performed in a manner consistent with the Comprehensive SWPPP requirements. Inspection must be performed at least once every quarter or more frequent as appropriate based on threat to water quality. Inspection findings must be address consistent with the Stormwater Compliance Enforcement Procedure of the Comprehensive SWPPP.

5. POINT OF CONTACT. Please address any questions about this memorandum to Mr. Ramon Camacho at (671) 339-3711 or ramon.camacho@fe.navy.mil.

C. L. ALMOND

Appendix I:
MS4 Construction Site Summary

2024 Naval Base Guam
MS4 Construction Site 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	GUR100041	02/18/2022 Jester Abucay	02/18/2022 Katherine M. Devela	5/16/2022	2/15/2027	4/27/2022	3/28/2024 6/7/2024 9/9/2024 11/14/2024	On-going
H2O Guam JV POC: Todd Cooper Title: Env. Manager Phone: 483-5965 Email: Cooper@obayashiguam.com	Lima Wharf Repair	GUR10002T	2/18/2021 N. Buyao	2/18/2021 N. Buyao	2/23/2021	2/16/2022	4/10/2021	3/27/2024 6/10/2024 9/5/2024 11/5/2024	On-going
	Mike / November Wharves Repair	GUR100065	10/03/2023 A. Itanı	10/26/2023 FEAD, NAVFAC Marianas	9/26/2023	2/16/2027	8/14/2023	3/27/2024 6/10/2024 9/5/2024 11/5/2024	On-going
Black Construction POC: Jaquay Soriano Title: Env Manager Phone: 671-646-4861 Email: jaquays@blackguam.com	P-519 X-Ray Wharf Repair	GUR100058	7/11/2022 D. Cowley	Pending	6/2/2022	9/9/2024	Pending	3/21/2024 5/13/2024 8/23/2024 11/26/2024	On-going
Core Tech-HDCC-Kajima, LLC POC: Olivia Idechuil Title: Env Manager Phone: 671-797-2480 Email: oidechuil@hdcc.com	J-609 Apra Embarkation Facility	GUR100063	06/08/2023 C Baradi	7/28/2023 LTJG Nykeem Thomas	6/13/2023	2/15/2027	7/11/2023	3/21/2024 6/4/2024 8/22/2024 11/14/2024	On-going
Commander, Task Unit 75.5.3 POC: LTJG Palermo Joseph Title: NMCB One Phone: 671-339-2213 Email: joseph.s.palermo13.mil@us.navy.mil	GM23-831 Unimproved Construction Access Road	GU210006W	Pending	Pending	5/22/2024	2/16/2027	Pending	N/A 11/20/2024	On-going

Appendix J:
MS4 Compliance Tracker

Appendix K:

Dry Weather Field Screening DMRs (Feb 2024 - Jan 2025)

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

Appendix M:
Exceedance Investigation Reports, CY2024