

**Response to Comments**  
**US Navy Arctic Ice Camp Permit Modification**  
**NPDES Permit No. AK0053783**

*December 13, 2017*

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On December 14, 2015, the U.S. Environmental Protection Agency (EPA) issued a National Pollutant Discharge Elimination System (NPDES) permit to the U.S. Navy for the discharge of wastewater from the Arctic Ice Camp.

On April 12, 2017, the U.S. Navy requested a modification to certain provisions in the permit. As a result of the request, EPA proposed changes to the permit and issued the permit for a limited comment permit on the proposed changes from November 2 to December 4, 2017. The proposed permit revisions include:

- Expanding the area of the potential camp location to account for increased ice movement during the six-week operational period.
- Removing the Permit provision at Part I.B.10., which requires the Permittee to remove all debris during the end-of-season demobilization efforts. This provision is redundant with the Marine Protection, Research and Sanctuaries Act.
- Removing the Permit provision at Part II.A.3.g., which requires the Permittee to incorporate the Spill Prevention, Control and Countermeasures (SPCC) into the Best Management Practices (BMP) Plan. This provision is under the jurisdiction of the Department of Interior.

The EPA received comments on the proposed permit modification for the U.S. Navy Arctic Ice Camp permit from Lindsey Kenyon of Environmental Review, Inc. on December 4, 2017. Below are the EPA's responses to the comments.

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**Response to Comments**

- 1.) Page 1 - Why is this document backdated to December 2015? How will the issue of operating without a permit last season be addressed?

**EPA Response:** The Permit has not been backdated nor did the permittee operate last season without a permit. As indicated on Page 1, the cover page of the Permit, the original permit was issued on December 14, 2015. The permittee operated in 2016 (not 2017) in compliance with the Permit. As described in detail in the technical Fact Sheet and summarized above, the Permittee requested a permit modification on April 12, 2017, which resulted in the proposed modifications. EPA was only accepting comments on the proposed modifications during the comment period that ended on December 4<sup>th</sup>. The modified permit will be in effect until December 31, 2020.

**No change has been made to the Permit as a result of this comment.**

- 2.) Page 9, Table 1, Note 2 - "All samples must be collected during maximum occupancy at the facility and during periods of maximum discharge." Why is this parameter different than the one stated under Section 1.B.12? "When visual monitoring is required, the Permittee must conduct visual monitoring at the time of maximum estimated or measured discharge." Should Section 1.B.12 include during maximum occupancy as well?

**EPA Response:** This comment is outside of the scope of the permit modification.

The sampling frequency specified on Page 9, Table 1, Note 2 is specific to two parameters (total suspended solids and biological oxygen demand) that the Permittee is required to collect, analyze, and report. These parameters cannot be assessed through visual monitoring. The description at Permit Part I.B.12. is specific to parameters that require visual monitoring, such as oil and grease, floating solids, foam, garbage, and oily sheen.

**No change has been made to the Permit as a result of this comment.**

- 3.) Page 11 Section II.3(b)(i) - Should the word "exampled" be substituted with "evaluated"?

**EPA Response:** This comment is outside of the scope of the permit modification. However, the word "exampled" is a typographical error and will be corrected as a minor modification pursuant to 40 CFR 122.63(a).

- 4.) Page 12 Section II.3(d) - "Ensure no facility debris is left on the ice during the end-of-season demobilization of the Arctic Ice Camp." This should include the reference of the Marine Protection, Research and Sanctuaries Act to ensure proper enforcement of the Best Management Practices (BMP) Plan.

**EPA Response:** The U.S. Navy must comply with all applicable laws and regulations for its Arctic Ice Camp activities. In this instance, the Navy is subject to the Marine Protection, Research and Sanctuaries Act independent of the NPDES permit.

**No change has been made to the Permit as a result of this comment.**

- 5.) Section II.3 - Add an employee training mandate to ensure that the BMP's methods of pollution prevention, control, and treatment is properly adhered to by all staff.

**EPA Response:** This comment is outside the scope of the permit modification.

BMPs are an important part of the NPDES permitting process to (1) prevent or minimize the generation and the potential for the release of pollutants from the facility to the waters of the United States through normal operations and ancillary activities; and (2) ensure that methods of pollution prevention, control, and treatment will be applied to all wastes and other substances discharged. Permit Part II.3. requires the Permittee to develop the BMP Plan consistent with the *Guidance Manual for Developing Best Management Practices* (EPA 833-B-93-004, October 1993), and requires documentation of employee training (see Permit Part II.A.4.b.ix).

**No change has been made to the Permit as a result of this comment.**

- 6.) Page 17 Section III.C. Monitoring Procedures - This paragraph refers to other EPA-approved methods. Please cite the guidance document explicitly.

**EPA Response:** This comment is outside of the scope of the Permit modification.

The Permit requirement at Permit Part III.C. sufficiently covers the monitoring procedures under three different scenarios: (1) in accordance with 40 CFR Part 136; (2) use of alternative test procedures as described in regulations at 40 CFR 136.5; or (3) as specified by the Permit.

**No change has been made to the Permit as a result of this comment.**

- 7.) Page 32 Section VI.55 - The edition of the latest Standard Methods for the Evaluation of Wastewater should be cited so the reader can verify that the latest edition will be used.

**EPA Response:** This comment is outside of the scope of the Permit modification.

The Permit requires that the most recent edition of the *Standard Methods for the Examination of Water and Wastewater* must be used. As the commenter may be aware, there have been many editions published in recent years and specifying the “latest edition” could potentially cause confusion in the future.

**No change has been made to the Permit as a result of this comment.**