



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
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Ser BPMOW.mlm/0835
Sept. 7, 2011

Jeanine Townsend,
Clerk to the Board
State Water Resources Control Board
P.O. Box 100,
Sacramento, CA 95812-2000



Dear Ms. Townsend:

This letter provides comments by the Department of Navy regarding the Draft Phase II Statewide NPDES Permit for Storm Water Discharges from Small MS4s and the list of REVISED New Non-Traditional Small MS4s (Attachment C).

The Department of Defense facility known as the former Naval Weapons Station Concord (NWS Concord) is included on the revised list of entities proposed to be designated by the State Water Resources Control Board as new small MS4s. Upon review of State Water Resources Control Board WATER QUALITY ORDER 2003-0005-DWQ, it was also noted that the NWS Concord facility was also listed in Attachment 3 of that order as a Non-Traditional Small MS4 (anticipated to be designated in the future.)

The NWS Concord facility should be excluded from the list of designated small MS4s. In 2008 the NSW Concord facility was operationally closed by order of Congress as part of the Base Realignment and Closure process. The facility was divided into an "Inland Area" and a "Tidal Area." The Tidal Area was transferred to the Army for continued operations as an active facility. This facility is now designated the Military Ocean Terminal Concord (MOTCO). The Department of Navy retained responsibility for the Inland Area which is under caretaker status pending completion of environmental cleanup actions and conveyance of the property.

There are no storm water discharges associated with industrial activity within or from the Inland Area of the NWS Concord property, and there are no active Navy operations except environmental investigation and cleanup activities in coordination with the State and Federal regulatory agencies on the Inland Area. The Inland Area is primarily grazing pasture land with a small administrative area. The US Navy requests that Concord Naval Weapons Station be deleted from Attachment C of the Draft Phase II Statewide Small MS4 General Permit. If you have any questions please contact Michael Mentink at (415) 743-4729.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patricia McFadden".

PATRICIA MCFADDEN
BRAC Field Team Leader
By direction of the Director

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Sept. 7, 2011

Copy to:
Alan Friedman
Regional Water Quality Control Board
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