



DEPARTMENT OF THE NAVY

NAVAL CONSTRUCTION BATTALION CENTER
264 MARVIN SHIELDS BLVD
GULFPORT MS 39501-5001

5090

Ser N4/019

April 16, 2025

Mr. William Stacy
Mississippi Department of Environmental Quality Chief,
Office of Environmental Permits Division
515 E Amite Street
Jackson, MS 39201

Dear Mr. Stacy:

SUBJECT: NO EXPOSURE CERTIFICATION FOR EXCLUSION FROM NATIONAL
POLLUTANT DISCHARGE ELIMINATION SYSTEM STORM WATER
PERMITTING FOR INDUSTRIAL ACTIVITIES

Naval Construction Battalion Center (NCBC) Gulfport's last No Exposure Certification was dated 5 June 2020 and expires five years from that date on 4 June 2025. Enclosure (1) is the installation's new No Exposure Certification for exclusion from National Pollutant Discharge Elimination System (NPDES) storm water permitting for industrial activities on NCBC. Enclosure (2) is an assessment of the installation's various activities justifying the No Exposure Certification.

Federal law 40 CFR 122.26 prohibits point source discharges of storm water associated with industrial activity to waters of the United States without a NPDES permit. However, according to 40 CFR 122.26(g), NPDES permit coverage is not required for discharges of storm water associated with industrial activities identified in 40 CFR 122.26(b)(14) (i)-(ix) and (xi), if the discharger can certify that a condition of "no exposure" exists at the industrial facility. The status of the installation activities has not changed since the 2020 renewal. The installation continues to operate under the Small Municipal Separate Storm Sewer (MS4) General Permit.

If you have any questions or require additional information, please contact Mr. Daron Tanko, Installation Environmental Program Director, at (228) 871-2026 or daron.j.tanko.civ@us.navy.mil.

Sincerely,

A. I. FRANCO
Captain, U.S. Navy
Commanding Officer

Enclosures: 1. No Exposure Certification
2. Assessment of Base Facilities



NO EXPOSURE CERTIFICATION for Exclusion from NPDES Storm Water Permitting

Submission of this **No Exposure Certification** constitutes notice that the entity identified below does not require permit authorization for its storm water discharges associated with industrial activity due to the existence of a condition of no exposure. This certification must be submitted every five years from the date of submittal.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product, or waste product. A storm resistant shelter is not required for the following industrial materials and activities (40 CFR 122.26(g)(2)):

- drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in storm water discharges (e.g., rock salt).

A **No Exposure Certification** must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from NPDES permitting is available on a facility-wide basis only, not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion.

By signing and submitting this **No Exposure Certification** form, the entity is certifying that a condition of no exposure exists at its facility or site, and is obligated to comply with the terms and conditions of the conditional exclusion for "no exposure" of industrial activities and materials to storm water found in 40 CFR 122.26(g). Please mail the completed form to: **Chief, Environmental Permits Division, Office of Pollution Control, P.O. Box 2261, Jackson, MS 39225**

For this certification to be considered, all questions on this form must be answered. If an item does not apply to you, enter "NA" (for "not applicable") to show that you considered the question. All answers must be printed or typed.

Facility Operator Information (All correspondence will be sent to this address).

1. Contact Name: Daron Tanko, Environmental Director 2. Phone Number: 228-871-2026
3. Legal Company Name: US Navy, Naval Construction Battalion Center
4. Mailing Address: Street: 461 Upper Nixon Ave, Building 322
City: Gulfport State: MS Zip Code: 39501
5. Email: daron.j.tanko.civ@us.navy.mil

Facility/Site Location Information (If no street address exists, provide the nearest named road [e.g., Intersection of Routes 9 and 55]. Do not use a P.O. Box number).

1. Facility Name: Naval Construction Battalion Center Gulfport
2. Street Address: 461 Upper Nixon Ave, Building 322
City: Gulfport County: Harrison Zip Code: 39501
3. Email: daron.j.tanko.civ@us.navy.mil

NO EXPOSURE CERTIFICATION

Facility/Site Location Information (Continued)

3. Latitude: N30° 22' 49" Longitude: W89° 06' 15" Source: USGS

4. Nearest named receiving stream: Turkey Creek

5. Was the facility or site previously covered under an NPDES storm water permit? ☒ Yes ☐ No

If yes, enter the NPDES permit or coverage number: MSR001468

6. Does this facility have other environmental permits? ☒ Yes ☐ No

If yes, provide type (Air, Hazardous Waste, NPDES, Pretreatment, State Operating) and permit number

MS4 Storm Water General NPDES Permit #MSRMS4036;

Air Synthetic Minor Operating Permit #1020-00080

7. SIC/Activity Codes: Primary: 9711 Secondary (if applicable): _____

Exposure Checklist

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?
(Please check either "Yes" or "No".)

Yes No

- | | | |
|--|--------------------------|-------------------------------------|
| 1. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 2. Materials or residuals on the ground or in storm water inlets from spills/leaks | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Materials or products from past industrial activity | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Material handling equipment (except adequately maintained vehicles) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 5. Materials or products during loading/unloading or transporting activities | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 6. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 8. Materials or products handled/stored on roads or railways owned or maintained by the discharger | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 9. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters]) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 10. Application or disposal of process wastewater (unless otherwise permitted) | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

If you answer "Yes" to any of these questions (1) through (11), you are not eligible for the no exposure exclusion and must be covered by an NPDES Storm Water Permit (individual permit or coverage under a general permit.)

NO EXPOSURE CERTIFICATION

Certification Statement

I certify under penalty of law that I have read and understand the eligibility requirements for claiming a condition of "no exposure" and obtaining an exclusion from NPDES storm water permitting.

I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under 40 CFR 122.26(g)(2)).

I understand that I am obligated to submit a no exposure certification form once every five years to MDEQ and, if requested, to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the MDEQ or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request. I understand that I must obtain coverage under an NPDES permit prior to any point source discharge of storm water from the facility. I understand that a copy of this certification must be retained at the facility.

Additionally, 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 gathered and evaluated 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.

Print Name¹: Ana I. Franco, CAPT, USN

Print Title¹: Commanding Officer, NCBC Gulfport

Signature¹: 

Date: 16 APR 2025

¹Certification shall be signed according to the Mississippi Water Pollution Control Regulations (11 Miss. Admin. Code Pt. 6, R. 1.1.2.C(1).)

For a corporation, by a responsible corporate officer.

For a partnership, by a general partner.

For a sole proprietorship, by the proprietor.

For a municipal, state or other public facility, by principal executive officer, mayor, or ranking elected official.

Instructions and Additional Information

Law

Federal law at 40 CFR Part 122.26 prohibits point source discharges of storm water associated with industrial activity to waters of the U.S. without a National Pollutant Discharge Elimination System (NPDES) permit. However, according to 40 CFR 122.26(g), NPDES permit coverage is not required for discharges of storm water associated with industrial activities identified at 40 CFR 122.26 (b)(14)(i)-(ix) and (xi) if the discharger can certify that a condition of "no exposure" exists at the industrial facility or site. Storm water discharges from construction activities identified in 40 CFR 122.26(b)(14)(x) are not eligible for the no exposure exclusion. Submission of this **No Exposure Certification** constitutes notice that the entity identified above does not require permit authorization for its storm water discharges associated with industrial activity due to the existence of a condition of no exposure.

Obtaining and Maintaining the No Exposure Exclusion

This form is used to certify that a condition of "no exposure" exists at the industrial facility or site described herein. By signing and submitting this **No Exposure Certification** form, the entity is certifying that a condition of no exposure exists at its facility or site, and is obligated to comply with the terms and conditions of 40 CFR 122.26(g). A **No Exposure Certification** must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from NPDES permitting is available on a facility-wide basis only, not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion. If conditions change resulting in the exposure of materials and activities to storm water, the facility operator must obtain coverage under an NPDES storm water permit immediately. This certification must be resubmitted at least once every five years. The "no exposure" certification is non-transferable.

Instructions for Determining a Facility's Latitude and Longitude

Enter the latitude and longitude of the facility entrance in degrees/minutes/seconds. Latitude and longitude can be obtained from United States Geological Survey (USGS) quadrangle or topographic maps, GPS, or by accessing web sites that have latitude and longitude finders.

Latitude and longitude for a facility in decimal form must be converted to degrees (°), minutes (') and seconds (") for proper entry on the certification form. To convert decimal latitude or longitude to degrees/minutes/seconds, follow the steps in the following example.

Example: Convert decimal latitude 45.1234567 to degrees (°), minutes ('), and seconds (").

a/ The number to left of the decimal point are the degrees: 45°

b/ To obtain minutes, multiply the first four numbers to the right of the decimal point by 0.006: $1234 \times 0.006 = 7.404$

c/ The numbers to the left of the decimal point in the result obtained in (b) are the minutes: 7'

d/ To obtain seconds, multiply the remaining three numbers to the right of the decimal from the result obtained in (b) by 0.06: $404 \times 0.06 = 24.24$. Since the numbers to the right of the decimal point are not used, the result is 24".

e/ **The conversion for 45.1234567 = 45° 7' 24".**

NAVAL CONSTRUCTION BATTALION CENTER (NCBC) GULFPORT
Assessment of Base Facilities Justifying No Exposure Certification
(as of 3/14/2025)

Activities within NCBC Gulfport														
Basin Number	2020 Bldg. No.	2025 Bldg. No.	Tenant	Not Industrial (NI) or No Exposure (NE)	Comments/Justification	Industrial code 40 CFR 122.26(b)(14)(i)-(xi) (no x)	Load /Unload	Veh/Eqmnt Maint	Painting Areas	Sanding/Blasting	Washrack	AST	Training	Outdoor Storage
2	435	435	Naval Construction Group 2 (NCG2) Armory	NI	Storage facility for all base hand held weapons. Outdoor covered, weapon cleaning area has oil/water separator (OWS) connected to the sewer system. Weather proof CONEX containers used for storage outside of building. Non-Industrial activity.	not covered	X							X
2	400-403, 409, K1, K2	400-403, 409, K1, K2	EMC2 Construction Equipment Division	NI	Expeditionary Maintenance Center 2 (EMC2) repairs and performs maintenance on mobile construction equipment (400) used for military construction operations and training. Operations performed indoors consist of covered painting operations (400), covered oil lubrication system (403), covered wash rack (402) with OWS, covered and bermed double walled above ground storage tanks (ASTs) and petroleum, oil and lubricant (POL) drum storage area (404) and an enclosed indoor abrasive blasting operation (401) with emission controls, and blasting & painting prep, and welding. All releasable or spillable oil and hazardous substances (OHS) stored within waterproof structures. Non-Industrial activity.	not covered	X	X	X	X	X	X	X	X
2	298	298	Dept of Homeland Security	NI	Department of Homeland Security performs maintenance of patrol boats indoors. AST in parking area is double walled, bermed in and under cover. Non-Industrial activity.	not covered	X	X				X		
2	243	243	MCRC Vehicle Maintenance Facility	NI	Marine Corp Reserve Center (MCRC) conducts repair and maintenance of military vehicles, small boats and equipment. All activities occur indoors under cover. Outdoor storage on paved area is for large vehicles/equipment. Unit deployed 80% of the year. Non-Industrial activity.	not covered	X	X						X

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2	398	398	Military Service Station	NI	Military vehicle refueling station for refueling military equipment and vehicles. Two double walled, bermed above ground storage tanks and fuel loading rack are adjacent to fueling station. Non-Industrial activity.	not covered	X					X		
2	428	429	Cargo Handling Battalion (CHB-13)	NI	CHB-13 performs minor vehicle/equipment maintenance in one shop at this building. A construction battalion was in other shops. Both moving to building 241. Complex consists of administrative building (428) and maintenance area (429). Updated building number to 429, since no maintenance in 428. No washrack at building. Non-Industrial activity.	not covered	X	X						X
2	275, 276	275, 276	90-Day Hazardous Waste Storage (276) Universal Special Waste Storage Facility	NE	All activities take place under cover and all material is contained. Outside storage is covered and has secondary containment. Closed drums, barrels and or tanks may be stored outside. Containers are only opened inside, under cover. Qualifies for no exposure.	122.26(b)(14)(iv)	X							X
2 & 6	18, 19, 20, 200, 203, 215, 216, 217, 218, 219, 222, 228, 319, 437, 443	18, 19, 20, 200, 203, 215, 216, 217, 218, 219, 222, 223, 225, 228, 319, 437, 443	General Warehouse and Storage	NE	Some warehouses contain military vehicles and construction equipment. Others contain emergency generators and associated tanks. Warehouse (228) serves as the Base's Centralized Hazardous Material Storage and Distribution Center. Most other warehouses may contain varying amounts of hazardous and non-hazardous supplies and materials. Qualifies for no exposure.	122.26(b)(14)(xi) SIC 4225	X					X		

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2	241, 242, 465, 466,	241, 242, 465, 466	Seabee Vehicle Maintenance Facilities	NI	Naval Construction Group Two (NCG2) and Naval Construction Battalions perform all vehicle maintenance of military vehicles and heavy construction equipment indoors and under roof. POLs stored indoors. Wash Racks (242 & 466) are covered for protection from storm water and have an OWS connected to the sanitary sewer system. Used oil stored in double wall ASTs on outside. Non-Industrial activity.	not covered	X	X			X	X		X
2	397, 456, 464	397, 456, 464	Moral Welfare Recreation facilities	NI	Moral Welfare Recreation facilities include Auto Hobby Shop (397), Self Service Carwash (464), and Outdoor Recreation Supplies & Equipment Storage & Maintenance Shop (456). All maintenance activities are performed indoors and/or under roof. Material are stored indoors and all storage tanks are double walled. The car wash facility (464) is covered and drains to an OWS connected to the sanitary sewer system. Non-industrial activity.	not covered	X	X				X		X
2	272, 273, 274, 421	272, 273, 274, 421	Public Works	NI	Public Works (PW) administrative offices and shops (274) including carpentry, metal fabrication, electrical, pesticide, paint and riggers. PW supports building maintenance and repair of the base. Small quantity of HAZMAT storage in facilities. All shops are indoors. Applicable SIC not identified. Non-Industrial activity.	not covered	X		X			X		X
2	470	470	Navy Exchange Mini-Mart & Gasoline Dispensing Facility (GDF)	NI	Commercial selling of petroleum products or vehicle maintenance services are not covered as an "industrial process" by this permit. Spill kit on site. Applicable SIC not identified. Non-Industrial activity.	not covered	X	X				X		

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2	47, 48, 49, 57, 67, 69, 385, 441, 442, 443	46, 47, 48, 49, 57, 67, 69, 70, 305, 345, 346, 385, 441, 442, 443	Naval Construction Training Center	NI	Naval Construction Training Center conducts most academic and instruction activities indoor or under roof. Numerous older buildings demolished and replaced with newer training facilities. The Crane and Dozer training areas have best management practices implemented and are also covered by the MS4. Non-Industrial activity.	not covered	X	X			X	X	X	X
2	393	393	USPS	NI	United States Post Office (USPS) for base. Covered loading dock. Post Office Branch services at this location. Transportation involves delivery to/from the post office building to off base site. No household delivery. Load and unloading of packaged items. No vehicle maintenance shops or equipment cleaning. Non-Industrial activity.	not covered	X							