

From: Robert Pierce
To: luis.ledesma@usmc.mil
Date: 11/6/2008 2:26 PM
Subject: Fwd: Re: USMC has new issue with SRTTP WDRs

Luis- As I mentioned on the phone, here are my supervisors' comments, and my response to them.

Separately, we have posted the supplemental package to the agenda website:
http://www.waterboards.ca.gov/sandiego/board_info/agendas/2008/nov_12/nov_08.shtml

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>>> Robert Pierce 11/6/2008 12:09 PM >>>
Mike-

The USMC received the supplemental Agenda package for the September Board Meeting. The draft contained in that package eliminated the discharge to the Santa Margarita watershed so discharge specifications were based on the San Luis Rey objectives. The USMC requested postponement to provide additional support for the discharge to the Santa Margarita watershed, this was presented October 23. As requested by and discussed with the Khalique Khan and Luis Ledesma, the current tentative Order includes the Santa Margarita watershed discharge, which has more stringent objectives. The only changes made to the permit from the previous draft to the current tentative Order are based on the additional discharge they requested. The focus of our discussions was the TDS specification, but it was conveyed that all specifications would be subject to the most stringent WQO. The original application & report did not establish the technological limitations they may have in meeting nitrogen/nitrate WQO. This point was only brought up after the tentative Order adjusted the discharge specification based on the WQO. Currently, I have asked for their operating data to determine what the actual capabilities are for nitrogen removal. I am working to address their request similarly to the changes we have made for TDS.
-Robert

>>> Mike McCann 11/6/2008 11:34 AM >>>
Clarification needed. JHR was at CP this AM and was told by CP staff that they just received a copy of the tentative WDRs that the RB will consider at the Nov. 12 RB Meeting. If that is true, then CP has an issue about adequate time to review and consider. JHR's direction to CP (Lupe Armas) is to write us a letter requesting postponement. If we have given them at least 30 days to review the tent. WDRs, CP shouldn't have an issue. If we have sent them a change to WDRs just recently, that is separate call (whether it was a significant change). Let JHR and I know the status of this.

Thanks, MM

>>> Julie Chan 11/5/2008 4:47:07 PM >>>
John and Robert,

Andy Entigh called at 4:30 pm on Wed. to say that the design of the treatment plant is such that the effluent can't meet the discharge specification for nitrate. I told Andy to call you guys tomorrow to discuss further. I told him I would be out on Jury Duty on Thursday and that he needed to discuss this with the two of you.

Let me know on Friday how it turns out.

Thanks,
Julie

From: Robert Pierce
To: R, Ledesma CIV Luis
CC: andrew.entingh@usmc.mil
Date: 11/7/2008 9:04 AM
Subject: Re: Emailing: SRTTP Version 2_ 2008 with Chart

Luis-

I will discuss the request with my supervisors and let you know as soon as possible, but I'm sure your request to postpone the item will be accepted.

The EIS does state the design parameters for the SRTTP that are not in the Engineering Report. The draft EIS was before my time at the board; while I reviewed the final EIS I focused on the more specific and more recent Engineering Report. The EIS also includes table 4.6-2 stating the Groundwater Basin Plan Water Quality Objectives, along with the statement (Section 4.6.2, pg 4-72, line 13) that infiltration from irrigation would recharge the sub-basins. Basin Plan Water Quality Objectives are standard for all reclamation permits.

Specifically, the quantitative impact on the groundwater is unknown. Similarly to the case of TDS, additional information would be needed to show that nitrogen that is discharged would not reach groundwater at the front gate area. Because the proposed RO system would not address nitrogen, the case for temporary exceedance could not be made. However, the benefit of nitrogen uptake by plants is known, so information may be available to support the case for no impact.

-Robert
>>> "Ledesma CIV Luis R" <luis.ledesma@usmc.mil> 11/6/2008 5:39 PM >>>

Mr. Pierce,
Attached is a letter requesting postponement of Tentative Order R9-2008-0089, Master Reclamation Permit for Marine Corps Base, Camp Pendleton. A faxed copy was sent to Mr. Robertus earlier today.

Additionally, I have attached process analytical data for total nitrogen sampled from SRTTP effluent. The samples were collected and analyzed following approved ELAP procedures but are not submitted as permit compliance.

Camp Pendleton did not submit nutrient analytical data (boron, MBAS, color, nitrogen, etc.) in the permit application because we did not anticipate permit limitations to Basin Water Quality Objectives in a Reclamation permit that is intended for landscape irrigation.

The SRTTP was designed with BAT for nutrient removal to 5 mg/l nitrogen as N, as documented in the Final EIS dated April 2004. RWQCB is listed as a coordinating agency in the EIS and received a draft and final copy for review and has never commented to the design not meeting the Basin Plan objectives.

If you have any additional questions concerning Plant design or performance, please contact me at (760) 725-0141

Sincerely

Luis Ledesma
Wastewater Branch Head
Assistant Chief of Staff, Environmental Security
MCB Camp Pendleton