

EXECUTIVE OFFICER SUMMARY REPORT
September 8, 2010

- ITEM: 8
- SUBJECT: NPDES Permit Modification: Order No. R9-2005-0149, NPDES No. CA0109088, Waste Discharge Requirements for Industrial Storm Water Discharges from Knight and Carver Yachtcenter Boat Repair Facility to San Diego Bay, San Diego County (Tentative Order No. R9-2010-0096) (Brian Kelley)
- PURPOSE: To add the drydock Diligence (Discharge Point BW-001) for coverage under the NPDES Order No. R9-2005-0149, NPDES No. CA0109088
- PUBLIC NOTICE: This action was noticed in the August 11, 2010 agenda notice which was mailed out on July 23, 2010. The tentative Order was also sent by e-mail and regular mail to the discharger and interested parties on July 7, 2010 (Supporting Document 2) and posted on the San Diego Water Board's website.
- DISCUSSION: **Current Receiving Water Quality Conditions**
This action involves an existing drydock previously operated by BAE Systems San Diego Ship Repair that has been purchased by and relocated to Knight and Carver Yachtcenter. The new location is approximately 3 miles south of the old location in San Diego Bay. Both sites are located in open Bay water at approximately the same depth adjacent to piers. The new location may have slightly less Bay circulation rates because it is farther from the opening of the Bay to the Pacific Ocean. These variations are expected to be negligible. All of the water quality objectives and beneficial uses that applied at the old location are the same as those that apply at the new location.
- Environmental Outcome of Tentative Order**
Because the drydock has already been operated in San Diego Bay at a similar location, no change to the water quality conditions of San Diego Bay are anticipated as a result of this permit action.
- Background**
On December 14, 2005, the San Diego Water Board adopted Order No. R9-2005-0149, National Pollutant Discharge Elimination

System (NPDES) No. CA0109088, establishing waste discharge requirements for Knight and Carver Yachtcenter Boat Repair Facility (Knight and Carver) to discharge storm water to San Diego Bay.

By letter dated March 16, 2010, Knight and Carver requested the San Diego Water Board to add the drydock Diligence (Discharge Point BW-001) to its NPDES Order. This drydock was purchased from BAE Systems San Diego Ship Repair, Inc. (BAE) and the drydock is being relocated to the Knight and Carver Facility. An action to remove the requirements from BAE System's NPDES permit was taken by the San Diego Water Board at the July 14th meeting. The drydock is regulated by the federal Vessel General Permit when it is underway as a vessel and that coverage has been transferred with the drydock to its new owner.

If adopted, tentative Order No. R9-2010-0096 (Supporting Document 2) would add requirements to Knight and Carver's NPDES Permit to regulate discharges from the floating drydock Diligence. The prohibitions, effluent limitations, Best Management Practices, monitoring, and other requirements relating to the floating drydock have been taken from BAE's NPDES Permit and incorporated into Knight and Carver's NPDES Permit with minor adjustments to match Knight and Carver's existing permit conditions.

The tentative Order was sent via email and regular mail to Knight and Carver and interested persons on July 7, 2010 and posted on the San Diego Water Board's website. Comments have been received by e-mail from Knight and Carver (Supporting Document 3). Response to comments (Supporting Document 4) and an errata (Supporting Document 5) are included with this agenda package.

**SIGNIFICANT
CHANGES:**

This Order modifies Knight and Carver's NPDES Permit to add requirements for a drydock that they recently purchased. This Order incorporates a ballast water discharge point for the drydock with effluent limitations. The Order also adds prohibitions, Best Management Practices (BMP) requirements, and new monitoring and reporting requirements. Knight and Carver is aware of these new requirements and is fully prepared to comply with them.

COMPLIANCE:

Knight and Carver is in compliance with their existing NPDES

Permit Order No. R9-2005-0149.

LEGAL ISSUES: None

SUPPORTING DOCS:

1. Location Map
2. Tentative Order No. R9-2010-0096
3. E-mail Comments from Knight and Carver dated July 26, 2010
4. San Diego Water Board Response to Comments by Knight & Carver
5. Errata Sheet for Order No. R9-2010-0096

RECOMMENDATION: Adoption of Tentative Order No. R9-2010-0096 is recommended.