

**California Regional Water Quality Control Board  
San Diego Region**

# **Response to Comments Report**

**Tentative Order No. R9-2013-0064  
NPDES NO. CA0109169**

***Waste Discharge Requirements for the United States  
Department of the Navy, Naval Base San Diego  
Complex, San Diego County***

**And**

**Time Schedule Order No. R9-2013-0095**

**August 14, 2013**

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN DIEGO REGION**

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## Executive Summary

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has prepared this Response to Comments Report regarding Tentative Order No. R9-2013-0064, NPDES No. CA0109169, United States Department of the Navy, Naval Base San Diego Complex and Tentative Time Schedule Order No. R9-2013-0095, *A Time Schedule Order Requiring the United States Department of the Navy, Naval Base San Diego Complex to Comply with Requirements Prescribed in Order No. R9-2013-0064, NPDES No. CA0109169.*

This report covers responses to comments on the Tentative Order and Tentative Time Schedule Order (TSO) that were received by July 8, 2013. The San Diego Water Board received two comment letters on the Tentative Order and Tentative TSO, from the United States Department of the Navy, Commander Navy Region Southwest (US Navy) and the United States Environmental Protection Agency (USEPA), (Supporting Documents Nos. 4 and 5, respectively). The report responds to the US Navy's 41 comments in the sequence provided in the US Navy's Comment letter. The response to the US Navy's comments is followed by the response to USEPA's comments on page 21. The comments are labeled in the first column "USN" for the US Navy and "USEPA" for USEPA's comments followed by their comment number.

The US Navy provided extensive comments on the Tentative Order and Tentative TSO with the bulk of the comments concerning the monitoring requirements. For the most part, the San Diego Water Board agrees with the US Navy's comments and made requested changes to the Tentative Order and Tentative TSO.

The San Diego Water Board disagreed with the US Navy's request that small municipal separate storm sewer system (small MS4) monitoring be identical to the monitoring required by the State Water Board's General Permit for the Discharge of Storm Water from Small MS4s (Order No. 2013-0001-DWQ) (Comment No. USN 24). The statewide Small MS4 General Permit does not explicitly require MS4 monitoring. MS4 monitoring is an important and integral tool needed to assess, revise and implement an effective program to reduce pollutants in storm water discharges to the maximum extent practicable. MS4 monitoring can also help identify illicit discharges and cross connections for elimination of dry weather flows. Nevertheless, the San Diego Water Board recognizes that the Tentative Order also directs the US Navy to comply with newly added monitoring requirements for industrial storm water discharges, industrial process waters, and toxicity. In addition, the toxicity monitoring is being increased at USEPA's request to measure chronic toxicity of "high risk" industrial storm water discharges. Therefore, in the interest of balancing resource management, the MS4 monitoring requirements were reduced in the Errata for the Tentative Order.

The USEPA commented that chronic toxicity monitoring be added for high risk industrial storm water discharges in order to inform reasonable potential determinations in future NPDES Permit reissuances for Naval Base San Diego. USEPA also commented that the Tentative Order be revised to either incorporate monitoring to ensure that incidental runoff from landscaped areas does not have an adverse effect on water quality, or to prohibit incidental runoff from landscape irrigation consistent with the recently adopted San Diego Regional MS4 Permit. The San Diego Water Board agrees with the USEPA on these issues and incorporated the requested changes in the Errata for the Tentative Order.

## COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064

Comment No.	Page No.	Section	Comment and Response
<b>Comments and Responses on Tentative Order R9-2013-0064, Waste Discharge Requirements</b>			
USN 1	21	III.D	<p><b>Comment:</b> Small typo on second line. Change "...or materials others than..." to "or materials other than..."</p>
			<p><b>Response:</b> The San Diego Water Board has corrected the typo through a global change in the Errata.</p>
USN 2	25	IV.A./Table 11	<p><b>Comment:</b> The Navy may be able to limit this discharge so that it only occurs for a few minutes approximately once every 3 months. Applying a monthly limitation to this type of discharge is inappropriate. Request, similar to other discharges in the permit, a footnote be added to the table stating that the Average Monthly limitation only applies if there is a discharge more than one day in a 30 day period.</p>
			<p><b>Response:</b> The San Diego Water Board appreciates the Navy's efforts to minimize their discharge volume as a means to pollution prevention. The requested change has been made in the Errata Item No. 2.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

Comment No.	Page No.	Section	Comment and Response
<b>Comments and Responses on Tentative Order R9-2013-0064, Waste Discharge Requirements, Continued</b>			
USN 3	31	IV.F.2.b	<p><b>Comment:</b> The order states "The SWPPP shall serve as the framework for identification, assignment, and implementation of measures and BMPs to control MS4 discharges from industrial activities in the Industrial No Exposure, Industrial Low Risk, and Industrial High Risk Areas of the NBSD. The BMPs and measures shall be selected to achieve BAT/BCT and compliance with all receiving water limitations."                      The required action is unclear. The section requires the SWPPP to serve as a framework to control MS4 discharges. Does "framework" mean that the required actions are to be included in the SWPPP? Additionally, per the Attachment A, Definitions, an MS4 area is an area where no industrial activity occurs. This section refers to MS4 discharge from industrial activities, which is contradictory with the MS4 definition.</p>
			<p><b>Response:</b> The San Diego Water Board agrees that the required action is unclear. Clarifying language has been provided in the Errata Item No. 3 that the SWPPP shall include the identification, assignment, and guidance for implementation of measures and BMPs to control discharges from industrial activities ... "MS4" has also been removed from this sentence to avoid confusion between municipal storm water discharges and industrial storm water discharges.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

Comment No.	Page No.	Section	Comment and Response
<b>Comments and Responses on Tentative Order R9-2013-0064, Waste Discharge Requirements, Continued</b>			
USN 4	31	IV.F.3.a.i	<p><b>Comment:</b> The order states "The Discharger shall determine the average concentration for each parameter using the results of all the sampling and analytical results for the entire facility for the reporting year (i.e., all "effluent" data) and compare this value to the corresponding annual NAL values in Table G-1."</p> <p>The size of industrial drainage basin areas at NBSD – Main Base varies by up to a factor of 60. Since the Discharger is required to submit estimated discharge volumes for sampled outfalls, there should be an option to calculate NAL values adjusted for discharge volumes. Please revise text to allow for volume-adjusted NAL calculations. This is tied better to pollutant loading.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The following sentence to allow for volume-adjusted NAL calculations has been added to the end of the paragraph in the Errata Item No. 4: "The Discharger has the option of calculating the flow weighted average concentration for all discharge effluent data for the entire facility in the same manner as Section IV.E of this Order to compare the corresponding annual NAL values in Table G-1."</p>
USN 5	52	VII.H.2	<p><b>Comment:</b> This item incorrectly states "chronic toxicity" under the section discussing acute toxicity. Request "chronic toxicity" be changed to "acute toxicity".</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested change has been made in the Errata Item No. 7.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

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<b>Comments and Responses on Attachment E, MRP</b>			
USN 6	E-3	I.A	<p><b>Comment:</b> This section states "Samples shall be collected at times representative of "worst case" conditions with respect to compliance with the requirements of this Order." It appears that no other San Diego NPDES permits have this condition. Worst case is not defined. It seems contradictory to require samples to be representative of the volume and nature of the discharge while also being representative of the worst case conditions. Request the last sentence be deleted.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The last sentence has been deleted as requested in the Errata Item No. 11.</p>

USN 7	E-3	I.D	<p><b>Comment:</b> This section states "Records shall be maintained for a minimum of five years from the...". Section IV.A of attachment D (Standard Provisions) requires maintenance of monitoring records for 3 years. Please clarify which requirement is correct.</p>
			<p><b>Response:</b> Although Federal regulations specify records shall be maintained a <i>minimum</i> of 3 years, the San Diego Water Board requires records to be maintained for 5 years which is consistent with the 5 year term of the Tentative Order.</p>



**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

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<b>Comments and Responses on Attachment E, MRP, Continued</b>			
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USN 8	E-5	II.B.3	<p><b>Comment:</b> This section states "Where a single drainage area, or similar <b>adjacent</b> drainage areas, discharges to multiple discharge points, the Discharger may propose a single monitoring location for that drainage area..." Recommend deleting "adjacent" in order to make the text similar to Section XI.C.3.a of the July 2012 Draft Industrial General Permit. Substantially similar industrial activities can occur in non-contiguous drainage areas.</p>
			<p><b>Response:</b> The San Diego Water Board agrees and the requested deletion has been made in the Errata Item No. 12. The text has been clarified to specify that the Discharger may propose a single monitoring location for similar drainage areas "<i>to the same receiving water</i>". This distinction is important to collect monitoring data for different receiving waters that may have different impairments, water quality standards, and beneficial uses.</p>

USN 9	E-7	IV.A.1., Table E-3	<p><b>Comment:</b> This table requires monthly flow monitoring for steam condensate discharges. Table E-13 requires that all monthly monitoring be reported in quarterly reports, but with the exception of flow all monitoring required for steam condensate is performed semi-annually or less frequently. Semi-annual monitoring is required to be reported in semi-annual self-monitoring reports. As currently written the reporting requirements could be interpreted to require quarterly reporting of flow for steam condensate and then semi-annual reporting for all other parameters. Rather than send in a quarterly report that only includes flow for this discharge request a footnote to Table E-3 be added that states the following - "The estimated daily flow for each month shall be reported in the semi-annual self-monitoring reports due on August 1 and February 1 of each year."</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested footnote has been added in the Errata Item No. 13.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

Comment No.	Page No.	Section	Comment and Response
<b>Comments and Responses on Attachment E, MRP, Continued</b>			
USN 10	E-7 – E-30	Tables E-3 - E-8	<p><b>Comment:</b> To ensure that pH can be performed within 15 minutes of sample collection, the test method for Tables E-3 through E-8 and E-10 through E-11 should be clarified to reflect the test method indicated in Table G-1 - "Field test with calibrated portable instrument, or lab sample in accordance with 40 CFR 136."</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested clarification has been made in the Errata Item No. 14.</p>
USN 11	E-8 - E-10	Tables E-4, E-5 and E-6	<p><b>Comment:</b> Request to change Sample Type for Flow from Grab to Estimate. A grab sample during a docking/undocking event in not an appropriate method of determining flow for these discharges.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The Sample Type has been changed to be "grab or estimate" in the Errata Item No. 15.</p>
USN 12	E-9	Table E-5	<p><b>Comment:</b> Delete "and Saltwater Supply System Water" from the title of the table. This is covered in Table E-6.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested deletion has been made in the Errata Item No. 16.</p>
USN 13	E-9, E-10	Tables E-5, E-6	<p><b>Comment:</b> These tables require flow as a daily estimate for the Caisson and EFS/SSS discharges. Rather than send a quarterly report with just flow for this discharge, request this be reported in the annual report and add a footnote, "The estimated daily flow for each month shall be reported in the annual self-monitoring reports due on September 1." All other caisson and EFS/SSS monitoring is due Annually.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested footnote has been added in the Errata Item No. 17.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

Comment No.	Page No.	Section	Comment and Response
<b>Comments and Responses on Attachment E, MRP, Continued</b>			
USN 14	E-12	E-10 – E11	<p><b>Comment:</b> Last line of this paragraph includes "steam vault discharge". NBSD does not have a steam vault discharge so request deleting reference to steam vault discharge.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested deletion has been made in the Errata Item No. 18.</p>
USN 15	E-13	V.A.2	<p><b>Comment:</b> This section states "The Discharger shall conduct a species sensitivity screening for acute toxicity which shall include..." This section should be rewritten to clarify that only one sample from one outfall during the first round of sampling is to be subject to sensitivity screening. Request this change be included to reduce the cost and effort for the sensitivity testing.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The section has been clarified in the Errata Item No. 19 that only one sample from one outfall during the first round of sampling is subject to sensitivity screening.</p>
USN 16	E-14	V.B.2	<p><b>Comment:</b> This section states "The Discharger shall conduct a species sensitivity screening for chronic toxicity which shall include..." This section should be rewritten to clarify that only one sample from one outfall during the first round of sampling is to be subject to sensitivity screening. Request this change be included to reduce the cost and effort for the sensitivity testing.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The section has been clarified in the Errata Item No. 20 that only one sample from one outfall is subject to sensitivity screening.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

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<b>Comments and Responses on Attachment E, MRP, Continued</b>			
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USN 17	E-14	V.A.4	<p><b>Comment:</b> The last sentence of this paragraph requires an additional test during the same calendar month of the exceedance or the next qualifying storm event. We may not receive the laboratory monitoring results during the same month when the sampling was performed and so we may not be aware of an exceedance in the same calendar month as the sampling. Request this sentence be revised to state "...within the same calendar month or next qualifying storm event after receiving results of an exceedance..."</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requirement has been revised to read in Errata Item No. 20: "...The Discharger shall also conduct an additional acute toxicity test within the same calendar month that the exceedance occurred or, in the event laboratory monitoring results are not received during the same month when the sampling was performed, the next qualifying storm event after receiving results of an exceedance for storm water discharges.</p>

USN 18	E-16	V.B.4.	<p><b>Comment:</b> Last sentence of this paragraph. Many of the process water discharges occur infrequently so it may not be possible to conduct an additional toxicity test during the same calendar month. In addition we may not receive the laboratory monitoring results during the same month when the sampling was performed and so we may not be aware of an exceedance in the same calendar month as the sampling. Request this sentence be revised to state "...within the same calendar month or the next discharge event after receiving results of an exceedance..."</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requirement has been revised to read in Errata Item No. 23: "...The Discharger shall also conduct an additional acute toxicity test within the same calendar month that the exceedance occurred or, in the event laboratory monitoring results are not received during the same month when the sampling was performed, the next discharge event after receiving results of an exceedance for storm water discharges.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

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**Comments and Responses on Attachment E, MRP, Continued**

USN 19	E-21	VIII.A.1.	<p><b>Comment:</b> This section requires that sediment monitoring outside the Graving Dock facility continue until the new sediment monitoring program is implemented. The cost to perform the sediment sampling, analyses, and reporting is approximately \$50,000 (\$49,436 in FY12). The Navy has submitted annual sediment monitoring reports to the SDRWQCB for over two decades so there is already significant data available for evaluation if necessary. The Navy has also performed preliminary sediment sampling for the 303(d) listed water body in the middle pier area at NBSD. At this point there is no benefit to conducting additional sediment monitoring in front of the Graving Dock facility when we are required to implement a new sediment monitoring program for the entire installation. The \$50,000 required for conducting one additional monitoring event would be better used in developing a new receiving water and sediment monitoring program in accordance with the new permit requirements. The data from one additional monitoring event will not change how the new program is implemented, and there is no need for more monitoring data. Request the requirement to continue sediment monitoring under the existing permit requirements be deleted so we can use those resources towards compliance with the new permit requirements.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested deletion of continuing sediment monitoring under the existing permit requirements has been made in the Errata Item No. 26.</p>

USN 20	E-26	IX.A.2.b.ii	<p><b>Comment:</b> This section request states "From a storm event that was preceded by 72 hours of dry weather." To simplify logistics for planning storm water sampling and observations request the text be revised to indicate this means "three calendar days of dry weather."</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested text revision has been made in the Errata Item No. 28.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

Comment No.	Page No.	Section	Comment and Response
<b>Comments and Responses on Attachment E, MRP, Continued</b>			
USN 21	E-27	IX.A.3.e.	<p><b>Comment:</b> This section requires sampling the next QSE during the wet season when there is no discharge from the first QSE. Because the monitoring is broken down into semiannual periods referring to the wet season may not be appropriate. Request "wet season" be replaced with "semi-annual period" in this paragraph. This change should be made to other sections as appropriate. In addition, it is unclear what is required if there is no QSE during a semi-annual period. For example if there is no QSE during the July through December semi-annual monitoring period then our interpretation of the requirements is that we are still only required to collect one sample during the January through June monitoring period. Request this be clarified.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested change of "wet season" replaced with "semi-annual period" has been made in the Errata Item No. 29. In addition, the Tentative Order has been clarified in the Errata to require the Discharger to report when a sample could not be taken during the semiannual period because a Qualifying Storm Event did not occur.</p>
USN 22	E-30	Footnote *	<p><b>Comment:</b> The first discharge point listed is called "BSD-068," needs to be changed to "NBSD-068."</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested change has been made through a global change in the Errata.</p>
USN 23	E-31	IX.A.5	<p><b>Comment:</b> Since sample collection is completed during semi-annual periods recommend the term "wet season" be replaced with "semi-annual period".</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested terms have been replaced in the Errata Item No. 31.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

Comment No.	Page No.	Section	Comment and Response
<b>Comments and Responses on Attachment E, MRP, Continued</b>			
USN 24	E-32	IX.B	<p><b>Comment:</b> This section requires storm water sampling and observations for non-industrial areas. The Navy understands the need to implement monitoring for discharges to Chollas Creek to comply with the TMDL, but requests the remaining portions of the installation have similar monitoring requirements as the statewide Phase II MS4 permit. This is the first permit issued to the Navy with specific MS4 program requirements and it will take time to implement the required programs. For this permit term the Navy requests the storm water monitoring requirements be consistent with the statewide Phase II permit. This would also be in accordance with previous discussions with staff on this issue.</p>
			<p><b>Response:</b> The San Diego Water Board disagrees in part. The statewide Small MS4 General Permit does not explicitly require MS4 monitoring for permittees with a population less than 50,000 and not already conducting ASBS, TMDL, or 303(d) monitoring. MS4 monitoring is an important and integral tool needed to successfully assess, revise and implement a program to reduce pollutants in storm water discharges to the maximum extent practicable. MS4 monitoring can also help identify illicit discharges and cross connections for elimination of dry weather flows. The San Diego Water Board requires MS4 monitoring from the two current statewide Small MS4 General Permit enrollees in the San Diego Region; the 22nd District Agricultural Association and the University of California - San Diego. Nevertheless, the San Diego Water Board recognizes that the Tentative Order also directs the US Navy to comply with newly added monitoring for industrial storm water discharges, industrial process waters, and toxicity. In addition, the toxicity monitoring for industrial storm water discharges is being increased at USEPA's request. Therefore in the interest of balancing resource management and considering the Navy has to develop this new monitoring program, the Tentative Order will be revised to extend the time for development and submittal of a MS4 monitoring plan to 24 months following the effective date of the Order. In addition, the number of representative monitoring locations will be reduced from five locations to three locations. These changes are reflected in Errata Item No. 33.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

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**Comments and Responses on Attachment E, MRP, Continued**

USN 25	E-32	IX.A.5.c/d	<p><b>Comment:</b> This section states "c. The Discharger shall ensure that all industrial storm water discharge sampling locations are representative of only those drainage areas associated with industrial activities. The storm water discharge observed and collected from these sampling locations shall be representative of the storm water discharge generated in each drainage area. For sheet flow, the Discharger shall determine the appropriate sampling location(s) which represent industrial storm water discharges generated from the corresponding drainage area. d. Dischargers shall identify practicable alternate sample collection locations representative of the facility's storm water discharge if: i. Specific drainage areas at the facility are affected by storm water run-on from off-site areas or on-site non-industrial areas;" The facility's storm drainage system for individual outfalls has not been designed to exclusively receive runoff from only non-industrial facilities or from only industrial facilities. Some of the facility's storm drainage systems that receive runoff from industrial facilities also receive non-industrial runoff. Sections IX.A.5.c and IX.A.5.d appear to be contradictory. Section IX.A.5.d appears to accept the limitations of the drainage system and require sampling at locations that are not affected by on-site non-storm water "run-on" where it can be accomplished (practicable). Alternatively, Section IX.A.5.c simply states that the "the Discharger shall ensure that all industrial storm water discharge sampling locations are representative of only those areas associated with industrial activities." This statement appears to exclude the inclusion of any non-industrial runoff (run-on) at the sampling location, which in most cases would be impossible given the current storm drainage configuration. For clarity, adding the phrase "where practicable" to the end of the first sentence of Section IX.A5.c would eliminate the apparent contradiction with Section IX.A.5.d and the creation of a currently impossible sampling situation.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested addition of "where practicable" has been made in the Errata Item No. 32.</p>

**Comments and Responses on Attachment E, MRP, Continued**



**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

Comment No.	Page No.	Section	Comment and Response
USN 26	E-35	Table E-13	<p><b>Comment:</b> Under sampling frequency, the last row in Table E-13 references Section IX.A.7 of the MRP – there does not appear to be a Section IX.A.7 in the MRP. A Storm Water Annual Report for Industrial High Risk Areas, Industrial Low Risk Areas and Small MS4 Areas is described in Section IX.C.</p> <p><b>Response:</b> The San Diego Water Board agrees. The requested change to Section IX.C has been made in the Errata.</p>

<b>Comments and Responses on Tentative Order R9-2013-0095, Time Schedule Order</b>			
USN 27	1	Finding 1	<p><b>Comment:</b> Request seawater cooling overboard discharge be added to the list of discharges.</p> <p><b>Response:</b> The San Diego Water Board agrees. The requested discharge has been added in the Errata Item No. 38.</p>

USN 28	3	Finding 8.a	<p><b>Comment:</b> Last sentence there is an extra period.</p> <p><b>Response:</b> The San Diego Water Board agrees. The period has been deleted through a global change in the Errata.</p>
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**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

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<b>Comments and Responses on Tentative Order R9-2013-0095, Time Schedule Order, Continued</b>			
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USN 29	3	Finding 8.b	<p><b>Comment:</b> Request last sentence be revised to be consistent with compliance schedule. Change sentence to read "... indicates compliance could be achieved as early as May 1, 2014. However, if extensive infrastructure changes are required achieving compliance could be delayed to May 1, 2017 to allow time to obtain funding and contracting services."</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested revision has been made in the Errata Item No. 39.</p>

<b>Comments and Responses on Attachment A</b>			
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USN 30	A-4	Definitions	<p><b>Comment:</b> The definition for Industrial Low Risk Areas in Attachment A is not the same as the definition written in the Order. Request the definition in Attachment A be revised to match the definition in the Order</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested change to the definition has been made in the Errata Item No. 8.</p>

USN 31	A-8	Definitions	<p><b>Comment:</b> The definition for Seawater Cooling Overboard Discharge should be in bold font.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested format change has been made through a global change in the Errata.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

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**Comments and Responses on Attachment A, continued**

USN 32	A-9	Definitions	<p><b>Comment:</b> First sentence in the definition for Storm Water Discharge Associated with Industrial Activity currently reads "...processing or raw materials storage areas at an industrial plan." Change "industrial plan" to "industrial plant" to be consistent with 40 CFR 122.26.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested spelling correction has been made through a global change in the Errata.</p>

**Comments on Attachment B - No Comments**

**Comments and Responses on Attachment C**

USN 33	C-2	Figure C-6	<p><b>Comment:</b> After further discussions with the staff at the Graving Dock facility it has been determined that the Caisson discharge volume per event is approximately 31,500 gallons, not the 180,000 gallons included on the process water line drawing. Request the following changes: 1) on the line drawing change "180,000 gallons per event" to "31,500 gallons per event; 2) change the footnote to read "The Caisson Gate discharges 31,500 gallons of captured bay-water per de-flooding event. The Caisson Gate is de-flooded twice per vessel repair evolution. The may be as few as 2 and as many as 6 evolutions per year. The resulting estimated Caisson Gate discharge ranges from 63,000 to 189,000 gallons of captured bay-water per year."</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested changes to the line drawing and the footnote have been made in the Errata Item No. 9.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

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<b>Comments and Responses on Attachment C</b>			
USN 34	C-3	Figure C-7	<p><b>Comment:</b> This figure no longer accurately describes this discharge. Please include the following revisions: 1) Change title to "Graving Dock Emergency Fire Suppression Water and Salt Water Supply Water"; 2) Change the line drawing regarding the 67,000 gallons to read "20 gallons per discharge event when supply is initially connected to ship and 2 gallons per minute (leaking past valve) while connected to ship."; 3) Change footnote to "When salt water supply is initially connected to the ship there is a short duration discharge from the system's relief valve to San Diego Bay. The discharge duration is approximately 45 seconds with a discharge volume of 20 gallons. After the initial discharge there is a 2 gallon per minute discharge of salt water that leaks past the valve. Assuming there are 3 docking events in a year and a vessel is in the dock 6 months during the year, the annual discharge volume is equal to: (20 gallons/docking event)(3 docking events) + (2 gallons per minute)(60 min/hour)(24 hours/day)(180 days) = 518,460 gallons</p> <p><b>Response:</b> The San Diego Water Board agrees. The requested changes to the title, line drawing, and footnote have been made in the Errata Item No. 10.</p>

<b>Comments on Attachment D - No Comments</b>
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**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

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<b>Comments and Responses on Attachment G</b>			
USN 35	G-12	Footnotes for Table G-1	<p><b>Comment:</b> Footnote 2 for this table requires the use of test methods 1638 and 1640 to analyze for copper. Storm water runoff is not a saline-matrix so the use of these more expensive methods should not be required. Request the footnotes be revised to require testing in accordance with 40CFR Part 136. This would also be consistent with the requirements included in the MRP.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested revision to the test method has been made in the Errata Item No. 35.</p>

<b>Comments on Attachment H - No Comments</b>
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<b>Comments and Responses on Attachment I</b>			
USN 36	I-1	II. Purpose	<p><b>Comment:</b> Requires a BMP Plan be developed for multiple discharges including, "seawater cooling and overboard discharges." Does not currently specify that these are specific to ships in the Graving Dock; needs to be specified as such, so that it is not applied to UNDS discharges on vessels in the water. The Fact Sheet on page F-13, paragraph 3. does address this, however it should be clear in Section II as well.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The text has been changed in the Errata Item no. 36 to clarify that the requirement only applies to vessels in the Graving Dock.</p>

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**Comments and Responses on Attachment I, continued**

USN 37	I-1	III. Objectives, Part C.	<p><b>Comment:</b> States the evaluation shall include...pier cleaning (among other items called out earlier). Why is pier cleaning included in this section and Seawater Cooling and overboard Discharges (specific to the GDF) are not? Remove pier cleaning from this section.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. Pier cleaning has been removed in the Errata Item No. 37 to be consistent with this section.</p>

**Comments on Attachment J - No Comments**

**Comments on Attachment K - No Comments**

**Comments on Attachment L - No Comments**

**Comments and Responses on Attachment F**

USN 38	F-4	Table F-1 Facility Information	<p><b>Comment:</b> NBSD Zip Code needs to be corrected, 91236-5084 needs to be changed to 92136-5084</p>
			<p><b>Response:</b> Comment noted. The zip code has been corrected in the Errata.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

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<b>Comments and Responses on Attachment F, continued</b>			
USN 39	F-17	b.	<p><b>Comment:</b> Section states the pollutants in the GD deflood water may be from any contaminants the water comes into contact with in the Dock. Add contaminants already in the Bay water entering the dock, and any contaminants that leach off a docking/undocking vessel's anti fouling paint.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The requested sentence has been added in the Errata Item No. 34. The text has been clarified that the pollutants found “may include but are not limited to.”</p>

USN 40	F-17	c.	<p><b>Comment:</b> The Graving Dock Caisson discharge volume should be changed from "...0.050 million gallons..." to "...0.032 million gallons..."</p>
			<p><b>Response:</b> Comment noted. The requested change has been made through a global change in the Errata.</p>

USN 41	F-36	Table F-6	<p><b>Comment:</b> Top left cell should include NGD-005.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. The table has been updated through a global change in the Errata.</p>

**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

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**Comments and Responses to USEPA's July 8, 2013 comment letter**

**Comments and Responses on Tentative Order R9-2013-0064, Waste Discharge Requirements**

USEPA 1	37	IV.G.1.m	<p><b>Comment:</b> Section IV.G. 1 .m. authorizes the discharge of incidental runoff from landscaped areas on the condition that the discharge does not contain quantities of pollutants that may cause or contribute to an exceedance of a water quality standard. The Water Board should incorporate monitoring to ensure that incidental runoff does not have an adverse effect on water quality, or remove the exemption consistent with the San Diego MS4 Permit (CASO 109266).</p>
			<p><b>Response:</b> The San Diego Water Board agrees. Incidental runoff from landscaped areas has been removed from the list authorized non-storm water discharges in the Errata Item Nos. 5 and 6.</p>

**Comments and Responses on Attachment E, MRP**

USEPA 2	E-30	Table E-11	<p><b>Comment:</b> Although EPA understands there is inadequate data to support requiring numerical effluent limitations, end-of-pipe monitoring for chronic toxicity should be incorporated into Table E-11 of the Order in order to inform future reasonable potential determinations. In addition to monitoring, the Water Board should include numerical thresholds for performing a toxicity reduction evaluation (TRE) and toxicity identification evaluation (TIE). At a minimum, monitoring requirements should be consistent with storm water discharge requirements in the Water Board's recently-adopted Boatyard General Permit (CAG7 19001) which requires twice annual monitoring for chronic toxicity.</p>
			<p><b>Response:</b> The San Diego Water Board agrees. Chronic toxicity monitoring has been included in Table E-11 in the Errata Item Nos. 21, 24, 25, 27, and 30. The requested change has been included to set a threshold for performing a toxicity reduction evaluation (TRE) and toxicity identification evaluation (TIE) for industrial storm water discharges.</p>



**COMMENT/RESPONSE MATRIX - Tentative Order R9-2013-0064**

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