

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

Response to Comments Report

**Tentative Order No. R9-2014-0037
NPDES No. CA0109363**

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

June 26, 2014

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

2375 Northside Drive, Suite 100, San Diego, California 92108
Phone • (619) 516-1990 • Fax (619) 516-1994
<http://www.waterboards.ca.gov/sandiego>

Documents are available at: <http://www.waterboards.ca.gov/sandiego>

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

Henry Abarbanel, *Chair*
Gary Strawn, *Vice Chair*
Eric Anderson
Tomas Morales
Sharon Kalemkarian
Stefanie Warren
Vacant

David W. Gibson, *Executive Officer*
James Smith, *Assistant Executive Officer*

Catherine Hagan, *Senior Staff Counsel, Office of Chief Counsel*

This report was prepared under the direction of

David T. Barker, *P.E., Supervising Water Resource Control Engineer, Surface Water Basins Branch*
Brandi N. Outwin-Beals, *P.E., Senior Water Resources Control Engineer, Source Control Unit*

By

Kristin K. Schwall, *P.E., Water Resource Control Engineer*
Ben Neill, *P.E., Water Resource Control Engineer*

This Page Intentionally Left Blank

Introduction

This report contains responses to written comments received on Tentative Order No. R9-2014-0037, NPDES No. CA0109363, United States Department of the Navy, Naval Base Point Loma Complex, San Diego County. The Tentative Order was available for public review and comment for 30 days, with the comment period ending on May 21, 2014.

Written comments were received from:	Page No.
United States Department of the Navy (U.S. Navy)	1

Comments and Responses

The written comments and staff responses are in the table that follows. The comments are organized according to the person that made the comment. The table indicates if the Tentative Order was revised in response to the comment.

No.	Comment	Response	Action Taken
United States Department of the Navy (U.S. Navy)			
1	<p>The U.S. Navy requests that the effective date for storm water monitoring be changed from August 1, 2014 to July 1, 2015. This change would align the monitoring required by the Tentative Order with the storm water year (July 1 to June 30) defined by the recently adopted statewide General Permit for Storm Water Permit Associated with Industrial Activities, Order No. 2014-0057-DWQ, NPDES No. CAS0000001. Under the Tentative Order, a monitoring plan for industrial storm water is required by November 30, 2014, and potential changes to monitoring locations can be addressed before sampling of industrial storm water is implemented. The July 1, 2015, effective date would also give the U.S. Navy more time to modify existing contracts or issue new contracts to accomplish required storm water sampling and analysis at Naval Base Point Loma (NBPL).</p> <p>For all other point source discharge requirements, the U.S. Navy requests that the effective date for monitoring be changed from August 1, 2014 to January 1, 2015. This change would give the U.S. Navy some time to modify existing contracts or issue new contracts to ensure effective sampling, monitoring and permit compliance support.</p>	<p>The San Diego Water Board can, to some extent, accommodate the U.S. Navy's request for a delay in the effective date of the monitoring requirements by postponing implementation of the non-storm and storm water monitoring program proposed in the Tentative Order until January 1, 2015. The proposed storm water monitoring program increases the number of monitoring events from one per storm per season in NBPL's existing permit (Order No. R9-2002-0002) to two storms per semiannual period. The Tentative Order defines semiannual periods as January through June and July through December of each year. The effective date for all monitoring, storm water and non-storm water has been changed from August 1, 2014, to January 1, 2015, in the Tentative Order in order to give the U.S. Navy time to modify existing contracts or issue new contracts to ensure effective sampling, monitoring and permit compliance support. See Attachment E, sections IV.A, IV.I.1 & 2, and VII.A.4.g & h of the Tentative Order for the changes. The U.S. Navy has informally agreed to this change.</p>	<p>Attachment E, sections IV.A, IV.I.1 & 2, and VII.A.4.g & h of the Tentative Order have been revised.</p>

No.	Comment	Response	Action Taken
2	<p>The Tentative Order allows the discharge of pier wash water from the Deperming Pier and the Pier 160 pilings and wing walls to remove accumulated guano from free-ranging seabirds and pinnipeds due to the presence of bait barges nearby. Other piers and docks at NBPL also require cleaning, although on a less frequent basis, to remove the accumulation of guano. To improve health and safety on these piers, the U.S. Navy may periodically wash these piers, or portions of them, in a similar manner using Bay or potable water, high-pressure Bay or potable water, and/or brushes. The wash water will be discharged directly into San Diego Bay. These conditions are likely to continue with or without the presence of the bait barges. The U.S. Navy is requesting that the Tentative Order be modified to allow discharges from these activities.</p>	<p>As described in section II.B.4.b of the Fact Sheet, Attachment F of the Tentative Order, the occasional cleaning of guano from piers and wing walls is not expected to be a significant source of pollutants so long as best management practices are employed to limit the amount of wastewater entering San Diego Bay. The Tentative Order has been modified to allow the occasional cleaning of additional piers and wing walls if best management practices (BMPs) are employed to reduce or eliminate the discharge to the maximum extent practicable (MEP). Section VI.C.3.b of the Tentative Order requires BMPs for pier washing. A description of the additional pier washing has been added to section II.B.4.b of the Fact Sheet to the Tentative Order. The U.S. Navy has informally agreed to this change.</p>	<p>Section II.B.4.b of the Fact Sheet to the Tentative Order has been revised.</p>
3	<p>The U.S. Navy attached an underline/strikeout copy of the Tentative Order with suggested changes that they consider to be minor corrections, edits or clarifications. These suggested changes include the following:</p> <ul style="list-style-type: none"> • Changing some language in section VII.A.3 and 4 of the Monitoring and Reporting Program to the Tentative Order to improve consistency with the newly adopted statewide General Industrial Storm Water Permit; • Adding the word “small” in front of “boat rinsing” throughout the Tentative Order; • Adding the word “marine” in front of “mammals” throughout the Tentative Order; • Adding “Building 140” to the facility address in Table 1 and Table F-1 of the Tentative Order; • Changing “dockside” to “topside” throughout the Tentative Order; and • Changing “Albacore” to “Abalone” in one reference to the “Abalone Tanks” in section IV.B.2.d of the Fact Sheet to the Tentative Order. 	<p>The San Diego Regional Board agrees with the suggested changes (except as noted below), and the Tentative Order has been modified accordingly.</p> <p>The U.S. Navy proposed changing section F of the Tentative Order as follows (in underline/strikeout):</p> <p>Permit Section F.1 Authorized Non-Storm Water Discharges Delete the following language:</p> <p>“k. Dechlorinated swimming pool discharges;</p> <p style="margin-left: 20px;">i. Residual chlorine, algacide, filter backwash, or other pollutants from swimming pools must be eliminated prior to discharging to the MS4; and</p> <p style="margin-left: 20px;">ii. The discharge of saline swimming pool water must be directed to the sanitary sewer, landscaped areas, or other pervious surfaces that can accommodate the volume of water, unless the saline swimming pool water can be discharged via a pipe or concrete channel directly to a naturally saline water body (e.g. San Diego Bay).”</p>	<p>The Tentative Order has been revised except as noted in the response.</p>

No.	Comment	Response	Action Taken
		<p>And add the following language:</p> <p><u>“n. Building fire suppression maintenance discharges (e.g., sprinkler line flushing) not otherwise regulated by this order.”</u></p> <p>The San Diego Water Board disagrees with these changes. The requirement to eliminate residual chlorine, algaecide, filter backwash, and other pollutants from swimming pool discharges is necessary to protect surface waters and is consistent with Order No. R9-2013-0001, the San Diego Region Municipal Separate Storm Sewer System (MS4) Permit. The building fire suppression maintenance discharges (e.g., sprinkler line flushing) are not authorized under section IV.F.1 of the Tentative Order unless best management practices are implemented to prevent the discharge of pollutants associated with such discharges (section IV.F.5 of the Tentative Order). The U.S. Navy has informally agreed to keep these provisions.</p>	

