

ITEM 6, SUPPORTING DOCUMENT NO. 4 - RESPONSE TO COMMENTS

TENTATIVE ORDER NO. R9-2015-0012

WASTE DISCHARGE REQUIREMENTS FOR UNITED STATES NAVY, REMOTE TRAINING SITE WARNER SPRINGS ONSITE WASTEWATER TREATMENT SYSTEM, SAN DIEGO COUNTY

The San Diego Water Board has the following responses to the comments submitted by the United States Navy on December 29, 2014:

No.	Section/Page	Comments	San Diego Water Board Responses
1.	Table 1	The complete facility name is "Remote Training Site Warner Springs" abbreviated as "RTSWS"	The requested change has been made in the revised tentative Order.
2.	Section III.C (Discharge Specifications)	Historic influent and effluent total nitrogen data are not available because monitoring of this parameter has not been required in the past (note: effluent nitrate as nitrogen has been consistently monitored). Although the new Orenco AdvanTex AX100 wastewater treatment system is expected to be capable of significantly reducing total nitrogen concentrations, it is possible that at times based on the influent wastewater composition, the influent total nitrogen concentration will already be relatively low and a 50-percent reduction may not be practicable for this system. In addition, the assimilative capacity analysis performed for effluent nitrate as nitrogen demonstrates that the discharge is not expected to cause the concentration of nitrate downgradient or beneath the site to exceed the nitrate groundwater quality objective in the Water Quality Control Plan for the San Diego Basin. Therefore it is requested that the discharge specification to achieve a 50-percent reduction in total nitrogen when comparing total nitrogen concentrations of influent and effluent samples collected on the same day be eliminated or revised to a performance goal only.	No change is being made to this section. The manufacturer specifies that the Advantex AX-Max textile filter units can achieve up to 60 to 70 percent nitrogen reduction without use of supplemental treatment components.

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3.	Section IV.A.3.a (Standard Provisions)	Due to the sensitive and secure nature of the training that goes on at this facility, it may not always be possible to grant access to some or all of the facility during training exercises. Therefore, request this section be revised to indicate “a. Enter, at reasonable times, upon the Discharger’s premises...”	The requested change has been made in the revised tentative Order
4.	Section IV.C.1.b (Special Provisions) and Tentative Monitoring and Reporting Program (Section VII.C.4)	As alluded to in the Tentative Order, it may be impracticable to equip the wastewater treatment system with a two-way telemetric alarm. In addition, if it is deemed practicable, due to federal acquisition rules it may take a couple years to program the funding and install the equipment.	No change is being made to these sections. As stated in Section IV.C.1.b of the Tentative Order, the requirement for equipping the OWTS/ATU with a telemetric alarm can be waived if the Discharger demonstrates to the satisfaction of the San Diego Water Board that a telemetric alarm is impracticable.
5.	Section IV. C.1.e (Special Provisions)	The wastewater treatment system is located in accordance with the lease agreement with the US Forest Service. There is an ephemeral stream located within 100 feet of certain portions of the wastewater treatment system and spray irrigation field. Due to the existing lease agreement, it is not possible to relocate these systems. Request this provision be removed.	<p>This provision has been modified in the revised Tentative Order as follows:</p> <p>No part of the <u>treatment system shall be located within 50 feet of a flowing stream or ephemeral stream drainage and 100 feet from a water supply well. No part of the spray irrigation field shall be located within 100 feet of a flowing stream or ephemeral stream drainage and 150 feet from a water supply well. The Discharger may propose alternative methods of compliance (e.g., installation/maintenance of best management practices, additional monitoring locations, etc.) to ensure that no part of the treatment system and spray irrigation system threaten to create a condition of pollution or nuisance in surface waters.</u> OWTS/ATU and the</p>

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			<p>spray irrigation field shall be closer than 100 feet to any water supply well, stream, channel, or other water source.</p>
6.	Section IV. C.4 (Special Provisions) and Attachment C- Information Sheet (Section IV.C.4)	<p>The Navy maintains trained qualified staff to operate, maintain, and monitor their wastewater treatment systems. Request this section be revised to indicate "The Discharger shall utilize trained qualified Government staff or obtain and maintain a contract with a service provider..."</p>	<p>This provision has been modified as shown below. The Information Sheet has also been modified to reflect the change.</p> <p>Revisions to Section IV.C.4:</p> <p><u>The OWTS/ATU must be supervised and operated by persons possessing a wastewater treatment operator certificate of the appropriate grade.¹ In addition, the Discharger shall may obtain and maintain a contract with a service provider² or demonstrate to the San Diego Water Board that they have appropriately qualified/trained Navy staff at the facility. to ensure proper operation, maintenance, and monitoring of the OWTS/ATU. Proper operation and maintenance includes effective performance, adequate funding, adequate training of service providers, and adequate laboratory and process controls including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems only when</u></p>

¹ Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 26

² "Service provider" means a person capable of operating, monitoring, and maintaining an OWTS/ATU consistent with the requirements and responsibilities of this Order and the O&M manual.

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			necessary to achieve compliance with the conditions of this Order.
7.	Section IV.C.5 (Special Provisions)	The Government maintains a Trucked Industrial Waste Generator Permit with the City of San Diego and uses a contracted vendor that maintains a Trucked Industrial Waste Hauler Permit with the City for transportation and disposal of waste activated sludge from the wastewater treatment system. The City of San Diego manages their solids and sludge in accordance with applicable Federal and California regulations. Request this section be revised, as necessary, to also allow for this solids/sludge management approach.	No change is being made to this provision. This provision does not prevent the U.S Navy from continuing to maintain its Trucked Industrial Waste Generator Permit with the City of San Diego for transportation and disposal of waste activated sludge from the treatment system.
8.	Attachment C- Information Sheet (Section I.A)	Typographic error: Second line, revise "..., San Diego Count2015-0012y." to "..., San Diego County."	The requested change has been made to the Information Sheet.
9.	Tentative Monitoring and Reporting Program (Section VII.C.4)	Typographic error: Second line, it appears the reference is intended to be "... Section VI of the MRP." instead of "... Section V of the MRP."	The requested change has been made to the Tentative Monitoring and Reporting Program.