

Lim, Joann@Waterboards

From: O'Connell, Kimberly <koconnell@ucsd.edu>
Sent: Friday, October 09, 2015 4:24 PM
To: Lim, Joann@Waterboards
Cc: Hampel, Julie; Outwin-Beals, Brandi@Waterboards
Subject: UCSD/SIO Comments on Draft Permit

Follow Up Flag: Follow up
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Joann,

Thank you so much for all of your work on the draft permit for UCSD/SIO (Tentative Order No. R9-2015-0070) and for addressing the Outfall 002 monitoring frequency clarification. We really appreciate the amount of time and effort that you have put into this document. The only other comment that we would like to submit for your consideration is as follows:

- 1) We request that the Concentrated Aquatic Animal Production Facility requirements be removed from Section C. Special Provisions, 3.b. BMPs for Confined Aquatic Animals (page 16) and from Section IV.B.3.b on page F-31.

We have confirmed with Birch Aquarium at Scripps (BAS) and Scripps Institution of Oceanography that they do not meet the definition of a Concentrated Aquatic Animal Production Facility. They are below the quantity threshold for the amount of fish produced (9,090 harvest weight kilograms) and for the amount of food fed (less than 5,000 pounds/month).

Thank you so much for your consideration of these comments. If you have any questions or would like additional information, please let me know.

Sincerely,
Kimberly

*Kimberly O'Connell
UCSD, EH&S
Environmental Affairs
9500 Gilman Drive, MC 0089
La Jolla, CA 92093-0089
Office: 858-534-6018
Cell: 858-583-3259*

From: O'Connell, Kimberly
Sent: Friday, October 09, 2015 3:45 PM
To: 'Lim, Joann@Waterboards'; Mariea de la Paz Carpio-Obeso
Cc: Hampel, Julie; Faick, Katherine@Waterboards; Outwin-Beals, Brandi@Waterboards
Subject: RE: Clarification on Condition 10 of Appendix A in our OP Exception

Hi Joann,
Your edits capture our understanding. Thank you very much!

Sincerely,
 Kimberly

Kimberly O'Connell
 UCSD, EH&S
 Environmental Affairs
 9500 Gilman Drive, MC 0089
 La Jolla, CA 92093-0089
 Office: 858-534-6018
 Cell: 858-583-3259

From: Lim, Joann@Waterboards [<mailto:Joann.Lim@waterboards.ca.gov>]
Sent: Friday, October 09, 2015 3:37 PM
To: O'Connell, Kimberly; Mariea de la Paz Carpio-Obeso
Cc: Hampel, Julie; Faick, Katherine@Waterboards; Outwin-Beals, Brandi@Waterboards
Subject: RE: Clarification on Condition 10 of Appendix A in our OP Exception

I think I just need to make a correction on my end (see red underline/strikeout below).

Table E-3. Effluent Monitoring at Outfall 002, Monitoring Location EFF-002

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method and (Minimum Level, units), respectively
Flow	MDG	estimate or recorder/totalizer	continuous ¹	²
Oil and Grease	mg/l	grab	1/year	²
Total Suspended Solids	mg/l	24-hour composite	1/year	²
Settleable Solids	ml/l	grab	1/year	²
Turbidity	NTU	grab	1/year	²
pH	pH Units	grab	1/year	²
Chronic Toxicity	Pass/Fail, % effect (Test of Significant Toxicity)	24-hour composite	2/year <u>5</u>	³
Other Ocean Plan Table 1 Parameters, except Acute Toxicity	µg/l	grab/24-hour composite ⁴	5 <u>6</u>	²

1. The Discharger shall estimate the flow rates. If a flow meter is installed at Monitoring Location EFF-002, then the recorded daily flow rate shall be reported.
2. Analytical methods as required under 40 CFR part 136.
3. Monitoring for whole effluent toxicity (WET) shall be conducted as specified in section III.C of this MRP.
4. Total phenols and volatile organics shall be grab samples.
5. **Two samples must be collected from Outfall 002 (once during dry weather and once during wet weather). If there is no flow during the dry weather from Outfall 002, only one sample must be collected from Outfall 002 during the wet weather.**
6. During the first year of the permit cycle, two samples must be collected from Outfall 002 (once during dry weather and once during wet weather). For wet weather samples, the effluent samples must also be analyzed for Ocean Plan indicator bacteria (total coliform, fecal coliform, and enterococcus). If there is no flow during the dry weather from Outfall 002 during the first year of the permit cycle, only one sample must be collected from Outfall 002 during the wet weather. After the first year of the permit cycle, the monitoring frequency may be reduced to once per year, unless notified otherwise by the San Diego Water Board.

From: O'Connell, Kimberly [<mailto:koconnell@ucsd.edu>]
Sent: Friday, October 09, 2015 2:36 PM
To: Lim, Joann@Waterboards; Carpio-Obeso, MarielaPaz@Waterboards
Cc: Hampel, Julie; Faick, Katherine@Waterboards; Outwin-Beals, Brandi@Waterboards
Subject: RE: Clarification on Condition 10 of Appendix A in our OP Exception

Hi Joann,

We do not have discharges from Outfall 002 during dry weather. Outfall 002 is a storm water outfall. The condition as written (once during dry weather and once during wet weather) would involve collecting one composite sample from Outfall 002 each year during wet weather and analyzing it for all Ocean Plan Table 1 constituents, chronic toxicity, and bacteria. No sample would be collected during dry weather because the outfall does not have a discharge.

Thanks,
Kimberly

*Kimberly O'Connell
UCSD, EH&S
Environmental Affairs
9500 Gilman Drive, MC 0089
La Jolla, CA 92093-0089
Office: 858-534-6018
Cell: 858-583-3259*

From: Lim, Joann@Waterboards [<mailto:Joann.Lim@waterboards.ca.gov>]
Sent: Friday, October 09, 2015 2:04 PM
To: Maria de la Paz Carpio-Obeso; O'Connell, Kimberly
Cc: Hampel, Julie; Faick, Katherine@Waterboards; Outwin-Beals, Brandi@Waterboards
Subject: RE: Clarification on Condition 10 of Appendix A in our OP Exception

Hi Mariela and Kimberly,

Kimberly - Do you have discharges from Outfall 002 during the dry weather?

Mariela - Based on the email below, it is my understanding that there is a mistake in Condition 10, Appendix A of the Adopted Resolution for UCSD/SIO. You want them to still collect two samples from Outfall 002 (dry and wet weather) and analyze these two samples for all Ocean Plan Table 1 constituents, except for toxicity, which is only once per year (wet weather), right? Are the corrections below accurate (shown in red underline/strikeout)? If the corrections are accurate, are you going to amend the resolution? Please reply.

During the first year of the permit cycle, two samples must be collected from Outfall 001 (once during dry weather and once during wet weather) and analyzed for all Ocean Plan Table 1 constituents. During the first year of the permit cycle, two composite samples must also be collected (once during dry weather and once during wet weather) representing flows from Outfalls ~~002~~, 003, 004A, and 004B; these two composite samples must also be analyzed for all Ocean Plan Table 1 constituents. During the first year of the permit cycle, two composite samples must also be collected (once during dry weather and once during wet weather) representing flows from Outfall 002; these two composite samples must also be

analyzed for all Ocean Plan Table 1 constituents, except for toxicity which only needs to be monitored in the wet weather sample. For wet weather samples from Outfall 001 and for the wet weather composite sample from Outfalls 002, 003, 004A, and 004B, the effluent samples must also be analyzed for Ocean Plan indicator bacteria. Based on these results, the Regional Board Water Board Executive Officer will determine the frequency of sampling (at a minimum, annually) and the constituents to be tested during the remainder of the permit cycle, except chronic toxicity must be tested at least twice annually.

Thanks,
Joann

From: Carpio-Obeso, MarielaPaz@Waterboards
Sent: Friday, October 09, 2015 11:48 AM
To: O'Connell, Kimberly; Lim, Joann@Waterboards
Cc: Hampel, Julie; Faick, Katherine@Waterboards; Outwin-Beals, Brandi@Waterboards
Subject: RE: Clarification on Condition 10 of Appendix A in our OP Exception

Joann

Let me know if you have further questions.
Thanks

MarielaPaz

Maria de la Paz Carpio-Obeso, Ph.D
Ocean Unit Chief
Division of Water Quality
State Water Resources Control Board
1001 I Street 15th Floor
Sacramento, CA 95814
Phone (916) 341-5858
Fax (916) 341-5584
E-mail: MarielaPaz.Carpio-Obeso@waterboards.ca.gov

From: O'Connell, Kimberly [<mailto:koconnell@ucsd.edu>]
Sent: Friday, October 09, 2015 11:36 AM
To: Lim, Joann@Waterboards
Cc: Hampel, Julie; Carpio-Obeso, MarielaPaz@Waterboards; Faick, Katherine@Waterboards; Outwin-Beals, Brandi@Waterboards
Subject: RE: Clarification on Condition 10 of Appendix A in our OP Exception

Hi Joann,
I just spoke with Mariela De La Paz Carpio-Obeso from the State Water Resources Control Board (cc'd) and confirmed that the SWRCB did not intend to increase the frequency of monitoring for chronic toxicity for Outfall 002 (storm water outfall) from once a year to twice a year.

Based on our conversation, the intent of Condition 10 of Appendix A in our Ocean Plan Exception was for UCSD/SIO to continue to monitor for chronic toxicity twice/year (once during wet weather and once during dry weather) for our seawater outfalls (Outfalls 001, 003, 004a, and 004b) and once/year for our storm water outfall (Outfall 002) during wet weather.

We request that Table E-3 on page E-6 of the draft permit be changed from twice/year to once/year for chronic toxicity for Outfall 002 (storm water).

Thank you,
Kimberly

Kimberly O'Connell
UCSD, EH&S
Environmental Affairs
9500 Gilman Drive, MC 0089
La Jolla, CA 92093-0089
Office: 858-534-6018
Cell: 858-583-3259

From: O'Connell, Kimberly
Sent: Thursday, October 08, 2015 7:00 PM
To: Maria de la Paz Carpio-Obeso; 'Faick, Katherine@Waterboards (Katherine.Faick@Waterboards.ca.gov)'
Cc: Hampel, Julie
Subject: RE: Clarification on Condition 10 of Appendix A in our OP Exception

Hi Mariela and Katherine,
Comments on our draft permit renewal are due this Monday and I wanted to follow-up on the question about whether or not you intended to increase chronic toxicity monitoring to twice a year for our storm water outfall. We have been doing it once a year (see email below). Our draft permit has increased the frequency to twice a year for our storm water outfall based on Condition 10 of Appendix A of the OP Exception and I told Joann Lim from our RWQCB that I would follow-up with you on this particular item.

Thanks,
Kimberly

Kimberly O'Connell
UCSD, EH&S
Environmental Affairs
9500 Gilman Drive, MC 0089
La Jolla, CA 92093-0089
Office: 858-534-6018
Cell: 858-583-3259

From: O'Connell, Kimberly
Sent: Thursday, September 03, 2015 6:59 PM
To: Maria de la Paz Carpio-Obeso; 'Faick, Katherine@Waterboards (Katherine.Faick@Waterboards.ca.gov)'
Cc: Hampel, Julie
Subject: Clarification on Condition 10 of Appendix A in our OP Exception

Hi Mariela and Katherine,
Condition 10 of Appendix A in our Ocean Plan Exception requires chronic toxicity to be monitored at our permitted outfalls twice a year (once during dry weather and once during wet weather). Based on the monitoring that we have been doing over the last 10 years, we are interpreting this to mean that chronic toxicity will be monitored twice/year (once during wet weather and once during dry weather) for our seawater outfalls (Outfalls 001, 003, 004a, and 004b) and once/year for our storm water outfall

(Outfall 002) during wet weather. We currently monitor Outfall 002 (storm water) once per year for all Ocean Plan Table 1 constituents (including chronic toxicity) and Ocean Plan indicator bacteria.

Please let me know if we are interpreting this correctly.

Thank you very much,
Kimberly

*Kimberly O'Connell
UCSD, EH&S
Environmental Affairs
9500 Gilman Drive, MC 0089
La Jolla, CA 92093-0089
Office: 858-534-6018
Cell: 858-583-3259*