



# California Regional Water Quality Control Board

## San Diego Region



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November 17, 2009

Mr. A. C. Entingh  
Head, Environmental Compliance Department  
AC/S Environmental Security  
U.S. Marine Corps Base  
P.O.Box 555008  
Camp Pendleton, CA 92055-5008

VIA CERTIFIED MAIL  
7009 1410 0002 2347 5494

In reply refer to:  
248629:rpierce

Dear Mr. Entingh:

**SUBJECT: NOTICE OF VIOLATION NO. R9-2009-0181, REVIEW OF MONITORING REPORTS FOR ORDER NO. 98-05 WASTE DISCHARGE REQUIREMENTS, (REF: 5090.7C ENVSEC/427)**

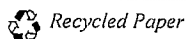
Enclosed is **Notice of Violation (NOV) No. R9-2009-0181** for United States Marine Corps (USMC) Sewage Treatment Plant No. 12 (San Mateo) located in Marine Corps Base Camp Pendleton, California. The California Regional Water Quality Control Board, San Diego Region (Regional Board) identified the violations cited in the NOV during the review of the nine quarterly and two annual Monitoring Reports for the time period of July 2007 through September 2009 submitted in accordance with Order No. 98-05.

The USMC reported that corrective actions have been taken to address some violations of the reporting requirements and discharge specifications. Biosolids Specifications Section D. 7 requires that Annual Reports for Biosolids Disposal be submitted to the Regional Board. The annual reports for 2007 and 2008, which the Regional Board has not received as of the date of this letter, should be submitted as soon as possible. In addition, the Reporting Limit for antimony, cadmium, and beryllium [11.1 micrograms per liter ( $\mu\text{g/L}$ )] for the July 10, 2007 effluent sample was greater than their respective maximum contaminant levels (MCLs: 6, 5, and 4  $\mu\text{g/L}$ , California Department of Public Health, 2006), and also was over 20 times greater than the published detection levels of the analytical method employed (USEPA method 200.8). The USMC must provide lower reporting limits for these metals to below their respective MCLs in future analysis.

The next monitoring reports due are the October – December 2009 quarterly and January – December 2009 annual reports due by January 30, 2010.

In the subject line of any response, please include the requested "in reply refer to:" information located in the heading of this letter. If you have any questions regarding this

*California Environmental Protection Agency*



matter, please contact Mr. Robert Pierce at (858) 627-3935 or at  
RPierce@waterboards.ca.gov.

Sincerely,



Julie Chan, P.G.  
Supervising Engineering Geologist  
Groundwater Basins Branch

JAC:bm:rep

Enclosures: Notice of Violation No. R9-2009-0181

CIWQS:

Regulatory Measure ID	142910
Place ID	248629
Enforcement ID	349903 (NOV)
Violation ID	777684 777685 777686 777687 777688 777689 777690 847187 847188 847189 847190 847191 847192 847193

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)  
**IN THE MATTER OF** )

)  
)  
United States Marine Corps )  
Marine Corps Base )  
Camp Pendleton, CA 92055-5008 )

**NOTICE OF VIOLATION  
NO. R9-2009-0181**

In reply refer to:  
248629:rpierce

**Waste Discharge Requirements: Order No. 98-05**

**Facility: Sewage Treatment Plant No. 12 (San Mateo), Marine Corps Base Camp Pendleton, California, San Diego County**

**YOU ARE HEREBY NOTIFIED THAT:**

The U.S. Marine Corps (USMC) violated waste discharge requirements prescribed in Order No. 98-05 *Waste Discharge Requirements for United States Marine Corps, Marine Corps Base Camp Pendleton, California, San Mateo Sewage Treatment Plant (12), San Diego County*. These violations subject the USMC to possible further enforcement action by the California Regional Water Quality Control Board, San Diego Region (Regional Board), including administrative enforcement orders requiring USMC to cease and desist from violations, or to clean up waste and abate existing or threatened conditions of pollution or nuisance; and referral to the State Attorney General for injunctive relief.

The Regional Board reviewed the nine quarterly and two annual Monitoring Reports listed below.

PERIOD	REPORT DATE	DATE RECEIVED
July – September 2007	October 29, 2007	October 30, 2007
October – December 2007	January 29, 2008	January 30, 2008
January – December 2007	January 29, 2008	January 30, 2008
January – March 2008	April 29, 2008	April 30, 2008
April – June 2008	July 29, 2008	July 30, 2008
July – September 2008	October 28, 2008	October 30, 2008
October – December 2008	January 29, 2009	January 30, 2009
January – December 2008	January 29, 2009	January 30, 2009
January – March 2009	April 29, 2009	April 30, 2009
April – June 2009	July 29, 2009	July 30, 2009
July – September 2009	October 29, 2009	October 30, 2009

Fourteen total violations of Order No. 98-05 were identified in the Monitoring Reports for deficient reporting, discharge specifications, and unauthorized discharge. The USMC has reported taking short-term corrective actions in response to these violations including additional contractor training, repair, and cleanup. The USMC is studying the potential for a new treatment plant as a long-term corrective action.

## Summary of Violations:

### I. DISCHARGE SPECIFICATION A.1.

This discharge specification prohibits discharges of wastes to lands which have not been specifically described in the report of waste discharge and for which valid waste discharge requirements are not in force.

Waste was discharged to unspecified land during one spill on February 5, 2009 when 1,000 gallons of returned activated sludge spilled from a loose hose at STP 12 and percolated into the ground. (1 violation)

### II. DISCHARGE SPECIFICATION B.1.

This discharge specification limits the discharge from STP 12 to an average daily flow rate of 0.35 million gallons.

Reported flow exceeded the discharge specification five days on September 14 through September 17, 2009 and October 1, 2009 with respective values of 0.381, 0.408, 0.482, 0.457 and 0.581 million gallons per day. (5 violations)

### III. DISCHARGE SPECIFICATION B.3.

This discharge specification limits the total suspended solids (TSS) discharge from STP 12 to a 30-day average of 30 milligrams per liter (mg/L) and a daily maximum of 45 mg/L.

Reported TSS concentrations exceeded the discharge specification for daily maximum with 134 mg/L on July 1, 2008 and the 30-day average with 34.7 mg/L in July 2008. (2 violations)

### IV. BIOSOLIDS SPECIFICATION D.7.

This biosolids specification requires the discharger to submit a copy of the annual report required by Code of Federal Regulations Title 40, Part 503 (40 CFR 503) and an annual report of the quantity and disposition of sludge generated in the previous calendar year.

As of the date of this NOV, the Regional Board has not received the annual sewage sludge disposal reports for 2007 and 2008. (2 violations)

## V. MONITORING AND REPORTING PROGRAM

The Order requires the USMC to comply with the Monitoring and Reporting Program No. 98-05, including specification B.1 requiring continuous flowrate measurement and weekly composite samples for biochemical oxygen demand (BOD), and TSS.

A deficient report was submitted for October – December 2007 because grab samples were collected in lieu of composite samples for the weeks of November 6 and November 13, 2007. A deficient report was submitted for October – December 2008 because a power failure caused the flow meter to stop recording on December 1, 2008. A deficient report was submitted for January – March 2009 because representative samples were not collected properly the weeks of January 6, January 13, and January 20, 2009 for BOD, and TSS each week. A deficient report was submitted for April – June 2009 because a sample was not collected the week of May 19, 2009. (4 violations)

*Julie Chan*

Julie Chan, Supervising Engineering Geologist  
Groundwater Basins Branch  
JAC:bm:rep

11/17/2009  
DATE