

Schwall, Kristin@Waterboards

From: Al Masry <abcenviro@hotmail.com>
Sent: Thursday, February 14, 2013 9:00 AM
To: Schwall, Kristin@Waterboards
Subject: Draft permit, 785854:Kschwall
Attachments: ,Final response to permit, Dec. 10, 2012.doc; Protecting Near Shore Marine Environments.doc

Good Morning Kristin:

I am enclosing thses letter to make sure you have it in the file. Would pleeezzz send me the link for regualtion of Enclosed Bays and estuaries, Part 2. If I remember correctly it stipulates sampling ONLY the sub-tidal zone; not marine sediments.

ABC Environmental Co.
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Tel: 951-536-1809
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Dec. 7, 2012

Ms. Kristin Schwall, WRE, Regional Water Board, San Diego
9174 Sky Park Court, Suite 100, San Diego, CA92123-4340

RE: Comments on the Proposed Permit for OCMC **785854:Kschwall**

Dear Ms. Schwall:

Mr. Tyrrell with OMC asked me to request ending of the some tests for these reasons:

1. The facility did not use TBT paint in the past or planning to do in the future. Test results during the last 10 years confirmed the absence of TBT;
2. The 5-stage clarifiers at each outfall, bar screens, strainers, etc. proved effective in eliminating settleable and floating solids discharge from the facility for many years; and
3. BOD5 lab test is done using fresh water is not represent to what might happen in saline sea water. In addition, few gallons, usually less than 5 gallons, are a rarely happens and immediately disinfected and removed by operators.

OMC has spent tens of thousands of dollars on advanced drainage control, collection system and waste recycling to protect water quality. The elimination of the above 3 tests is justified and rewarding to the facility effort.

Unsolicited daily boat repairs along docks are a threat to water quality. It is the responsibility of Port Authority; not OMC, to monitor harbor water quality for enforcements. Monitoring moving-and-dredged marine sediments in the harbor is inconclusive.

Kindest regards,



Aladdin M. Masry, BS, MS, MS

N.B. I will be glad to discuss the advanced technology available to treat industrial wastewater from offshore installations.

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Dec. 20, 2012

Mr. David Gibson, E.O.
Regional Water Board, San Diego
9174 Sky Park Court, Suite 100
San Diego, CA92123-4340

Attn: Ms. Kristin Schwall

RE: Protecting Near Shore Marine Environment

785854:Kschwall

Worldwide, sediment traps and o/w separators combined with dischargers BMP proved protective against pollution from urban and industrial runoff. Part 1 Sediment Quality sampling is justified only for Low-energy embayment as in lagoons and estuaries of well defined "sub-tidal zones". Sampling the constantly moving "superficial" marine sediments is inconclusive and non-scientific. Oceanside harbor is surrounded by Boulder rip-rap, concrete bulkheads, iron curtains and the northern two-third section of San Diego Bay does not meet the requirements for low-energy environment.

I respectfully suggest testing for settleable solids t at point of discharge to detect illicit discharges instead of sampling moving marine sediments. Bar screens, strainers, etc. are also required to prevent floating solids from discharge. The combined system at Oceanside Marine Centre proved effective /protective over years to the harbor water quality.
Happy Holidays.

Kindest regards,



Aladdin M. Masry, BS, MS, MS

N.B. An underwater video camera can show sediment movement all times. This is in addition of the annual dredging of hundred-thousand tons of marine sediments.

Attachment

From: [Al Masry](#)
To: [Schwall, Kristin@Waterboards](mailto:Schwall.Kristin@Waterboards)
Subject: Draft permit, 785854:Kschwall
Date: Thursday, February 14, 2013 8:59:53 AM
Attachments: [.Final response to permit, Dec. 10, 2012.doc](#)
[Protecting Near Shore Marine Environments.doc](#)

Good Morning Kristin:

I am enclosing thses letter to make sure you have it in the file. Would pleeezzz send me the link for regualtion of Enclosed Bays and estuaries, Part 2. If I remember correctly it stipulates sampling ONLY the sub-tidal zone; not marine sediments.

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From: Al Masry <abcenviro@hotmail.com>
Sent: Thursday, February 14, 2013 9:43 AM
To: Schwall, Kristin@Waterboards
Subject: RE: 785854.kschwall, Prohibition of Marine Sediment Sampling

Importance: High

Dear Kristin:

Please reconsider marine sediment sampling. P.2 stipulate what can be sampled and Oceanside Harbor does not meet the requirements.

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From: Kristin.Schwall@waterboards.ca.gov
To: abcenviro@hotmail.com
Subject: RE: 785854.kschwall, Typo Error
Date: Thu, 6 Dec 2012 17:24:22 +0000

http://www.swrcb.ca.gov/water_issues/programs/bptcp/docs/sediment/sed_qlty_part1.pdf

Kristin K. Schwall, P.E.
Water Resources Control Engineer
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4353

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From: Al Masry [mailto:abcenviro@hotmail.com]
Sent: Wednesday, December 05, 2012 3:58 PM
To: Schwall, Kristin@Waterboards
Subject: RE: 785854.kschwall, Typo Error

Good afternoon:

How deep sediment sampling RWB expect? Is it few inches or few feet?

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From: Kristin.Schwall@waterboards.ca.gov
To: abcenviro@hotmail.com
Subject: RE: 785854.kschwall, Typo Error
Date: Mon, 3 Dec 2012 21:20:08 +0000
Al,
Table 6 is for storm water not for sediment.

Kristin K. Schwall, P.E.
Water Resources Control Engineer
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From: Al Masry [mailto:abcenviro@hotmail.com]
Sent: Monday, December 03, 2012 12:08 PM
To: Schwall, Kristin@Waterboards
Subject: RE: 785854.kschwall, Typo Error
Importance: High

Thanks for your response. My problem is absence of explicit statements that order things to be done. For example:

NAL in ttable 6 (not E-6) does state clearly it is for sediments.
Measuring pH and TSS of the marine sediments are not meaningful
The COD of marine sediments is not meaningful. What if the soil is actually organic in nature?
It will help if you change the title of Table six for clarity.

FYI, bottom sediments move all the times like clouds in the air. Chaos math. or Ferni sStatistics for nuclear reactions will not be able to model it by the super computer Crai. I am trying to help.

Kindest regards, Aladdin

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From: Kristin.Schwall@waterboards.ca.gov
To: abcenviro@hotmail.com
Subject: RE: 785854.kschwall, Typo Error
Date: Mon, 3 Dec 2012 18:32:02 +0000
Al,

Table E-5 is for receiving water. Sediment monitoring requirements are in the State Board's Sediment Quality Plan. Table E-6 has annual monitoring for many things other than floating dry dock.

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From: Al Masry [mailto:abcenviro@hotmail.com]
Sent: Monday, December 03, 2012 10:00 AM
To: Schwall, Kristin@Waterboards
Subject: RE: 785854.kschwall, Typo Error

Good Morning:

Is Table E-5 for sediment too?

Is page E-6 for floating docks only? OMC do not have Ballast water per se.

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From: Kristin.Schwall@waterboards.ca.gov
To: abcenviro@hotmail.com
Subject: RE: 785854.kschwall, Typo Error
Date: Mon, 3 Dec 2012 17:52:46 +0000

Al,

Thank you for the correction of monitoring locations. The sediment sampling requirements start on page E-10.
Kristin

From: Al Masry [mailto:abcenviro@hotmail.com]
Sent: Saturday, December 01, 2012 2:45 PM
To: Schwall, Kristin@Waterboards
Subject: 785854.kschwall, Typo Error

Good Morning Kristin:

In table E-1 for OMC monitoring locations should be defined as NE & SE ; instead of both SW.

Does the permit requires marine sediment sampling? Please help me to find it with my 50% vision.

Kindest regards, Aladdin

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From: [Al Masry](#)
To: Schwall.Kristin@Waterboards
Subject: O'Side tidal Zone, 785854:kschwall
Date: Thursday, March 07, 2013 3:36:55 PM
Importance: High

Good Afternoon Kristin 

The attached pictures taken at 2:10 pm low tide along the N & S outfalls. The high tide is near the bottom of vegetation and barnacle line shown on the rubber sleeves. Both the N & S outfalls location are structured as vertical steel curtain supported by rocks rip-raps. Sampling sediment in the sub-tidal zone of Part 1 is not applicable to Oceanside special setting cited above. Please consider the attachments as part of Oceanside recent comment letter on the proposed permit.

FYI, the sand filter is recently installed at the N outfall for additional protection of the runoff.

Kindest regards, Aladdin

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