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June 20, 2013

VIA EMAIL

David W. Gibson
Executive Officer
San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, California 92123-4340

In reply refer to: ID 794466: JEBSEN

Re: Comments on the Tentative Order No. R9-2013-0093; Waste Discharge Requirements for San Diego Bay Environmental Restoration Fund – North, the San Diego Bay Environmental Restoration Fund – South, San Diego Shipyard Sediment Remediation Project, San Diego Bay, San Diego, California

Dear Mr. Gibson:

In response to the Regional Water Quality Control Board's request of May 24, 2013, the applicants respectfully submit the attached list of comments on the subject Tentative Order Waste Discharge Requirements.

Should there be any questions regarding these comments, please do not hesitate to contact me at 619-546-8377.

Sincerely,
San Diego Shipyard Sediment Site Group

A handwritten signature in black ink that reads "Michael A Palmer".

Michael A Palmer, PG
Project Coordinator

Attachment

cc: Mike Chee, NASSCO (Via Email)
Shaun Halvax, BAE Systems San Diego Ship Repair Inc. (Via Email)
Ray DeWitt, Padre Associates (Via Email)

COMMENTS ON ORIGINAL WDR/401 PUBLIC NOTICE
Comment/Edit

| Page | Paragraph | Comment/Edit |
|-------------|--|--|
| Global | | Please change all references to "BAE" to "BAE Systems". |
| Global | | Because there are multiple dischargers, please change all references to "discharger" to "dischargers". |
| 7 | 2nd paragraph under Project Overview | Barge dewatering will also be part of the remediation process. Please add to the statement. |
| 8 | 1st paragraph, sentence starting with "In sediment areas..." | Only clean sand and gravel will be placed. Please remove reference to "other armoring material" |
| 8 | Paragraph H | The combined "under pier" area is 2.7 acres. The applicants request that the number be revised to 2.7 acres. |
| 9 | Paragraph I, last sentence | Please revise the sentence to read: A production rate of up to 1,200 cy per day is expected to be achieved. |
| 9 | Paragraph J | Based on statements from Otay/Republic, in-situ sampling can be used. Therefore please revise the second sentence in that paragraph to: The sediment must be sampled and analyzed to classify the material for transport and disposal. The sediment may be sampled <i>in situ</i> prior to dredging or sampled once it is staged and stockpiled in the sediment management area. |
| 10 | Paragraph K | Based on the information from Otay/Republic and to be consistent with Paragraph J above, please remove the words "and tested" in the first sentence and the words "upon removal and" from the third sentence. Also, change "Water" to "Waste" in the last sentence. |
| 10 | Paragraph M | The dredge volume for the South Shipyard is 50,000 cubic yards; the dredge volume for the North Shipyard is 105,000 cubic yards. Please correct the volumes shown in this paragraph. |
| 18 | Paragraph "Eelgrass J" | Eelgrass beds far removed from dredging activities will not be impacted. The shipyards request that only eelgrass beds within 100 ft of dredge activities be marked. |
| 30 | Paragraph 2 A | The CAO and RAP require the Dischargers to determine chemical concentrations of the COCs at 5 cm. Please correct the reference to 10 cm in this paragraph. |
| 30 | Paragraph 2B | For consistency with the RMP, the shipyards request that the paragraph be revised to read: If all SMU concentrations are less than 120 percent of the post-remedial dredge area concentration, SMU cleanup is complete and no further action is required, though a sand cover may be applied to provide a restorative layer for biological growth. |
| 30 | Paragraph E | If the subsurface concentrations within a SMU are confirmed to be greater than 120 percent of the post-remedial dredge area concentration, the following additional remedial actions will be evaluated: Additional dredging of the SMU, obtaining and analyzing additional samples from within the SMU or clean sand placement. |
| 30 | Paragraph E | For consistency with previous requirements, please change the first sentence to read: Prior to sediments leaving the sediment management areas the Dischargers shall perform analytical testing of stockpiled sediment (unless the analytical testing was conducted on sediment samples obtained in situ prior to dredging) as dictated by landfill |