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July 9, 2003

Mr. Stephen McElroy, Facility Manager
University of Southern California
Wrigley Institute
P. O. Box 5069
Avalon, CA 90704

INCOMPLETE REPORT OF WASTE DISCHARGE (ROWD) FOR NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR POINT SOURCE DISCHARGES INTO AREA OF SPECIAL BIOLOGICAL SIGNIFICANCE (ASBS); EXCEPTION TO OCEAN PLAN PROHIBITION FOR THE USC CATALINA MARINE SCIENCE CENTER, SANTA CATALINA ISLAND, CA (NPDES No. CA0056651, CI6068)

Dear Mr. McElroy:

Thank you for your letter and ROWD submitted on June 11, 2003, in response to our October 16, 2002 letter regarding the point source discharges into an Area of Special Biological Significance. In your letter you requested an exception to the Ocean Plan discharge prohibition for the USC Catalina Marine Science Center, Santa Catalina Island, California.

We have reviewed the ROWD and determined that it is incomplete. In order to make a determination in this exception request, the USC Wrigley Institute must submit the following information:

1. The results of a quantitative survey of inter-tidal and sub-tidal life in the vicinity of the discharges. For comparison purposes, the survey should be performed at a reference location with analogous conditions within the north side of ASBS #25 (but not directly adjacent to Two Harbors, because of storm water influences). A qualitative comparison of this survey should be made with the original reconnaissance survey performed in 1979 for ASBS #25. This survey and comparison with past data will be an important component of the record in support of the exception. This quantitative survey would provide a baseline for the biological monitoring that would be imposed in the upcoming permit, if the exception is granted.
2. A description of the two other waste streams that occasionally co-mingle with the waste seawater. One is the rinse water (such as fresh water from cleaning of dive gear) from the dive locker/waterfront holding tank area, and the other is storm water runoff.
3. Submittal of additional information, including flow rates/volume, as well as pollutant contributions, from the co-mingled wastes. Pollutants that may be present due to rinse water

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may include residual chlorine, copper or sediment from erosion downstream of the outdoor sink, and due to storm water runoff (bacteria, metals, oil and grease). In addition, when the waterfront holding tanks are being drained, rinsed and cleaned with additional fresh rinse water, organic solids, fecal matter, and possibly sediment due to erosion, are likely discharged with the waste seawater from those tanks. Therefore, pollutant data for the co-mingled wastes at the point of discharge when those waste streams are present (i.e., when the dive equipment is being rinsed; when fish holding tanks are being drained/cleaned; and when there is rainfall) must be submitted for our evaluation. In order to be consistent with other permits adopted for the similar facilities, the monitoring data must include total flow, salinity, temperature, pH, dissolved oxygen, fecal coliform, total coliform, suspended solids, settleable solids, BOD₅20°c, oil and grease, turbidity, residual chlorine, ammonia nitrogen, nitrate nitrogen, nitrite nitrogen, arsenic, cadmium, copper, lead, zinc, silver, mercury, nickel, and selenium.

4. Submittal of data to confirm the statement that during the summer the discharge “is typically 1-2 degrees warmer than open water...”. Measurements of the effluent temperature should be compared against the long term temperature records referred to in the letter prepared by Dr. Miller.
5. Submittal of chronic toxicity data as required in the Ocean Plan, *Section III.C.3.*, using critical life stage bioassays on a fish (e.g., *Atherinops affinis*), an invertebrate (e.g., *Haliotis rufescens* or *Strongylocentrotus purpuratus*), and a plant (*Macrocystis pyrifera*). At a minimum, chronic toxicity testing should be performed during the summer on effluent containing rinse water from the dive area, and during the winter effluent containing storm water runoff from that portion of the site that drains into the seawater outfall.
6. A description of the disposition of drain water from the re-circulating baths (having chemicals added as described in Dr. Miller’s letter).
7. A description of alternatives for the discharge, including those associated with their co-mingled rinse water and storm water discharges, in order to comply with the California Environmental Quality Act (CEQA).
8. An identification of storm water discharges. Wrigley lab does not qualify for coverage under the general MS4 Phase II permit because it is not a municipality. Therefore, the other storm water discharges that are not co-mingled with waste seawater should also be identified and addressed through this permit/exception. USC should develop and submit a Best Management Practices (BMP) plan. The BMP plan should aid in reducing or preventing pollutants in the storm water runoff.

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Once we have received the above-referenced information, we will be able to process and consider your request for the exception. Your cooperation for submittal of the above information is appreciated. If you have any questions regarding this letter, please contact David Hung at 213/576-6664 or Dominic Gregorio of State Board at 916/341-5488.

Sincerely,



Dennis A. Dickerson
Executive Officer

Cc: Dominic Gregorio, DWQ, State Water Resources Control Board
Michael Lauffer, Office of Chief Counsel
Kathy Ann Miller, Wrigley Marine Science Center, USC

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