

EXECUTIVE OFFICER SUMMARY REPORT
September 10, 2008

- ITEM: 8.A.
- SUBJECT: National Pollutant Discharge Elimination System (NPDES) Permit Reissuance: Waste Discharge Requirements for the Marine Corps Base, Camp Pendleton Southern Region Tertiary Treatment Plant discharge to the Pacific Ocean via the Oceanside Ocean Outfall, San Diego County (Tentative Order No. R9-2008-0096, NPDES Permit No. CA0109347) (*Melissa Valdovinos*)
- PURPOSE: To adopt updated waste discharge requirements and NPDES permit for the treatment and disposal to the Pacific Ocean of up to 3.6 million gallons per day (MGD) of at least secondary-treated effluent from the Marine Corps Base, Camp Pendleton Southern Region Tertiary Treatment Plant (SRTTP). If adopted this order would update and replace Order No. R9-2003-0155.
- PUBLIC NOTICE: The NPDES permit hearing notice was published in the San Diego Union Tribune newspaper on August 4, 2008 for the Regional Water Board meeting scheduled for September 10, 2008. Copies of the tentative order were sent out on August 11 and 12, 2008 to Marine Corps Base, Camp Pendleton and to all known interested parties and agencies. Copies were made available for public review at the Regional Board office on August 11, 2008. The tentative order was also posted on the Regional Board's website on August 12, 2008. A public notice of the changed location for the public hearing was published in the San Diego Union Tribune newspaper on August 27, 2008
- DISCUSSION: Marine Corps Base, Camp Pendleton is the owner and operator of the SRTTP, which provides treatment and disposal of municipal wastewater collected from Marine Corps Base, Camp Pendleton. The treated wastewater is discharged to the Oceanside Ocean Outfall (OOO). The City of Oceanside owns and operates the OOO, which conveys discharges from Marine Corps Base, Camp Pendleton, the City of Oceanside, Fallbrook Public Utility District, and Genentech, Inc. to the Pacific Ocean. The daily average flow capacity at SRTTP is 5 MGD (with daily peaks of 10 MGD). However, capacity limitations for discharges through the OOO currently limit the discharge of wastewater from Camp Pendleton to the Pacific Ocean through the OOO to 3.6 MGD.

Recycled water from the SRTTP is proposed for irrigation use at four on-base sites. Requirements for recycled water use will be covered under Order No. R9-2008-0089, Master Reclamation Permit with Waste Discharge Requirements for the United States Marine Corps: Discharges of Reclaimed Water for Landscape Irrigation at Marine Corps Base, Camp Pendleton, if adopted at the September 10, 2008 Regional Board meeting.

Effluent from the SRTTP that is not distributed as recycled water will be discharged to the Pacific Ocean via the OOO. The effluent discharge specifications contained in Tentative Order No. R9-2008-0096 for the discharge of treated wastewater to the Pacific Ocean fully implement the 1994 Water Quality Control Plan for the San Diego Basin as amended and the 2005 Water Quality Control Plan for Ocean Waters of California (Ocean Plan). The tentative order contains minimum secondary treatment requirements established in the Code of Federal Regulations (40 CFR 133.102) for total suspended solids (TSS), biochemical oxygen demand (BOD), percent removal of TSS and BOD, and pH.

The need for water quality-based effluent limitations for toxic pollutants listed under Table B of the Ocean Plan was determined using the reasonable potential analysis (RPA) procedures of the Ocean Plan, which were added in 2005. The RPA procedures use a statistical approach to determine if SRTTP's discharge has the potential to cause an exceedance of the water quality objectives for the Pacific Ocean for the toxic pollutants listed under Table B of the Ocean Plan, based on historical effluent data and the dilution factor for the OOO. The RPA results for SRTTP discharge indicated that the effluent only has reasonable potential to cause exceedances of water quality objectives for chronic toxicity, copper, and total chlorine residual; therefore, water quality-based effluent limitations are included in the tentative order for these parameters. Performance goals, rather than effluent limitations, are included in the tentative order for all other toxic pollutant parameters of Table B of the Ocean Plan. Performance goals are not enforceable effluent discharge specifications or standards for the regulation of the discharge; however, inclusion of performance goals supports State and federal antidegradation policies and provides all interested parties with information regarding the expected levels of pollutants in the discharge that should not be exceeded to maintain the water quality objectives established in the Ocean Plan.

Comments on Tentative Order No. R9-2008-0096, from Marine

Corps Base, Camp Pendleton, were submitted by email on August 27, 2008. Any additional comments received, responses to comments, and errata, if needed, will be provided in the supplemental agenda packet.

SIGNIFICANT
CHANGES:

The following areas in Tentative Order No. R9-2008-0096 differ from the current Order No. R9-2003-0155:

1. Order No. R9-2003-0155 regulates secondary-treated effluents from Treatment Plants 1, 2, 3, and 13. Since November 5, 2006, raw sewage from Plant 13 has been fully diverted to the SRTTP and the tertiary-treated wastewater has been combined with secondary-treated effluents from Treatment Plants 1, 2, and 3 at a central pump station (Lemon Grove Pump Station) for discharge to the Pacific Ocean through the OOO. By November 1, 2009, raw sewage from Plants 1, 2, and 3 will also be fully diverted to the SRTTP.
2. The influent oil and grease limit of 25 mg/L has been removed.
3. Standard language for certain Findings, Standard Provisions, and the permit format recommended by the State Board are implemented.
4. Based on the Ocean Plan Reasonable Potential Analysis (RPA) Amendment that was adopted by the State Board on April 21, 2005 and historical effluent data, the initial dilution ratio has been recalculated, resulting in a slight increase from 80:1 to 87:1. Attachment G of the tentative order contains information regarding how the new dilution factor was calculated.
5. A RPA was conducted using data supplied by Marine Corps Base, Camp Pendleton. Effluent limitations were included for constituents with reasonable potential to exceed water quality objectives. Constituents that do not have reasonable potential or had inconclusive RPA results are assigned performance goals in the tentative order. These constituents are also assigned monitoring requirements, but the results will be used for informational purposes only, not compliance determination.
6. The discharge was determined to have reasonable potential to cause exceedances of water quality objectives for chronic toxicity, copper, and total chlorine residual, and thus, an effluent limitation calculated using the revised initial dilution ratio was included in the tentative order.

7. Section VII – Compliance Determination has been added to explain how compliance with the requirements of the tentative order will be determined.

COMPLIANCE:

Marine Corps Base, Camp Pendleton has generally complied with the requirements of the current NPDES permit, Order No. 2003-155. No noncompliance actions resulted in monetary penalties during the previous permit term. Noncompliance with Order No. R9-2003-0155 consists of the following:

1. Some oil/water separators that discharge to the sewage collection system were not consistently inspected on a weekly basis or inspections were not logged as specified for source control in the order.
2. During for November 2007, December 2007, and January 2008, the influent oil and grease limit of 25 mg/L was exceeded.
3. Overall Marine Corps Base, Camp Pendleton appears to be completing the majority of preventative maintenance on time; however some quarterly, semi-annual, and annual preventative maintenance activities have been behind schedule.

KEY ISSUES:

None

LEGAL CONCERNS:

None

SUPPORTING DOCS:

1. Site map
2. Transmittal letter for Tentative Order No. R9-2008-0096
3. Tentative Order No. R9-2008-0096, including Attachments A-G
4. Email comments from Marine Corps Base, Camp Pendleton, dated August 27, 2008

RECOMMENDATION:

Adoption of Tentative Order No. R9-2008-0096, NPDES Permit No. CA0109347, is recommended.