Item No. 5

Supporting Document No. 4

State of California—Health and Human Services Agency California Department of Public Health

CDPH RON CHAPMAN, MD, MPH Director & State Health Officer

SAN DIEGO REGIONAL WATER QUALITY CONTROL BOARD



EDMUND G. BROWN JR. Governor

2014 MAY 22 PM 2 27

May 19, 2014

Ms. Julie Chan, P.G., Chief Groundwater Protection Branch California Regional Water Control Board San Diego Region 2375 Northside Drive, Suite 100 San Diego, California 92108

June 26, 2014

Dear Ms. Chan:

Subject: TENTATIVE ADDENDUM NO. 1 TO ORDER NO. R9-2009-0021 MASTER RECLAMATION PERMIT FOR THE UNITED STATES MARINES CORPS BASE CAMP PENDLETON, SOUTHERN REGIONAL TERTIARY TREATMENT PLANT, CAMP PENDLETON, SAN DIEGO COUNTY

The California Department of Public Health, Santa Ana District (hereinafter Department) received an email dated April 30, 2014 from Ms. Kristin Thomas of the United States Marines Corps Base Camp Pendleton South System requesting comments on the Teritative Addendum No. 1 to Order No. R9-2009-0021 Master Reclamation Permit for the United States Marines Corps Base Camp Pendleton, Southern Regional Tertiary Treatment Plant, Camp Pendleton, Dan Diego County.

The subject documents prepared by the California Regional Water Quality Control Board – San Diego Region have been reviewed by the Department. We offer the following comments:

- 1. Order Modification 2, C.5 on page 3 Provide domestic water supply well location in a map if the well is within 1,000 feet from the water reuse area.
- 2. Order Modification 2, C.6 on page 4 Provide a copy of cross connection inspection or testing report to the Department.

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Ms. Julie Chan Page 2 May 19, 2014

We appreciate the opportunity to review those documents. If you have any questions, please contact myself at (714) 558-4997 or Mr. Minliang Shih at (714) 547-0430.

Sincerely,

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Oliver Pacifico, P.E. District Engineer Santa Ana District

cc: Randy Barnard California Department of Public Health

San Diego County Department of Environmental Health

Brian Shin Marine Corps Base Camp Pendleton

Kristin Thomas Marine Corps Base Camp Pendleton Comment 1: Page 4, Section C.6 Second Paragraph – Recommend deleting sewage overflow and spill reporting to DEH. Sewage overflow and spill reporting are regulated by NPDES Permit CA019347 (R9-2013-0112) Special Provisions C.2.b.

Comment 2: From page 1-10 of the permit application, Section 1.9, CPEN Requests the Addendum adds a line that deletes Section E.4, Plant Overflow Events. Spill reporting provisions for the SRTTP are regulated by NPDES Permit CA019347 (R9-2013-0112) Special Provisions C.2.b. Deleting this section resolves reporting conflicts for in-plant spills under 1000 gallons.

Comment 3: Att. A, #13 - Facilities typically implies the infrastructure. Human contact is also possible at use areas. Recommend "facilities" be revised/expanded to "use areas" or "irrigation areas."

Comment 4: Page 1-10 Section 1.10 Permit Rewording to Reflect Authority Under CWA and SDWA includes language that changes several sections to comply with laws and regulations which the United States Congress has provided a waiver of sovereign immunity. Request inclusion of these changes to assure permit is fully within jurisdiction of the Clean Water Act and/or Safe Drinking Water Act.

Comment 5: Page 1-1 of the permit application requests Section B.6 change total nitrogen from 4.1 as a daily maximum to 5.0 as a 12 month average. Request addition of this change.