

Response to Comments

Comment Deadline: July 12, 2021 by 5:00 p.m.

Draft Waste Discharge Requirements (WDRs) and Monitoring and Reporting Program (MRP)

Order R7-2021-0033

US Marine Corps, Twentynine Palms Air-Ground Combat Center

P-192 Potable Water Treatment/Blending Facility

Twentynine Palms, San Bernardino County

Changes proposed in response to written comments received through July 8, 2021, are described below and incorporated into a redline that is available upon request. Please contact Scot Stormo at (760) 776-8964 or Scot.Stormo@waterboards.ca.gov for a copy.

Verbal Comment #	Date	Commenter	Affiliation
Marine Corps Air-Ground Combat Center (MCAGCC)	07/01/2021	Chris Elliott, Environmental Affairs	Discharger

ID	Comment	Response
MCAGCC-01	Pdf page 1. Address of discharger uses incorrect zip code of 92233. MCAGCC's zip code is 92278.	The zip code was corrected to "92278."
MCAGCC-02	Pdf page 5. Document page 2, Line Item 6, states there are two storage tanks north of the project site – there are four storage tanks, commonly referred to as the EQ Tanks in the EQ Tank Yard.	Finding 6 was corrected to indicate "Four existing water storage tanks..."
MCAGCC-03	Pdf page 6. This estimates the volume of 7-ft of 36-in dia standpipe as "approximately 360 gals" whereas it is approximately 370 gals	Finding 7.d was changed to reflect "370" gallons.
MCAGCC-04	Pdf page 9. Hydrogeologic Conditions item 26 - Correct spelling is Transverse Arch.	Finding 26 was corrected to "Transverse Arch."

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MCAGCC-05	<p>Pdf page 16. We request clarification on the following paragraph: “The Discharger shall not cause the concentration of any Constituent of Concern (including Monitoring Parameters), as defined in MRP R7-2021-0033 and incorporated herein by reference, to exceed its representative concentration limit in any monitoring medium (i.e., exceed the Water Quality Protection Standard [WQPS]). The concentration limit for each constituent will be set in accordance with the MRP. Data analysis shall be performed in accordance with the MRP.”</p> <p>-This paragraph is under “Discharge Specifications” and the bullets prior are all related to the water discharged to the ponds/impoundments. We want to confirm that the “concentration limits for each constituent” listed here are related to the surrounding groundwater as measured in the monitoring wells and not to the water discharged to the ponds.</p>	<p>The limitation only applies to monitoring mediums outside of the surface impoundments, such as the soil or groundwater, not to concentrations inside the impoundments.</p> <p>Discharge Specification B.4 was revised to include the phrase “...outside of the surface impoundment structures...” after the phrase “...any monitoring medium...”</p>

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MCAGCC-06	<p>Pdf page 18. WDR Discharge Specification item 19 – Specifies the average and maximum wind speed. Request not specifying wind speed limitations in the WDR to allow field adjustments. Also, the MSE can be operated without the sprayer, and this article would not allow the MSE to be operated as recommended by the MSE vendor. Requested language –“The sprayer system shall not be operated when visible mists are observed to be reaching the edge of the Surface Impoundments.”</p>	<p>Operation of the MSE without the sprayer subsystem is acceptable as long as that reduces the production of airborne mists to the point that they do not reach the edges of the surface impoundments. However, basing a decision on when the sprayer can be operated solely on visual indicators is not acceptable.</p> <p>Discharge Specification B.19 was revised to allow the MSE to operate without the sprayer subsystem; the wind speed threshold in B.19.a was changed to “10 mph” to match the modeling; the single wind gust specification in B.19.b was changed to “15 mph”; and Discharge Specification B.19 was expanded to allow the Discharger to request a revision to the wind speed value after conducting additional field studies, if desired, subject to the approval of the Regional Water Board’s Executive Officer. The following paragraph was added:</p> <p>“The Discharger may request an adjustment to the wind speed limitation by providing data from onsite studies regarding the distance mists drift under various wind speeds and directions. Prior to performing these studies, the Discharger shall submit a workplan of the proposed studies for review and approval. The wind speed limitation shall not be adjusted until the revised value is approved by the Regional Water Board’s Executive Officer.”</p>

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MCAGCC-07	<p>Pdf page 22. Request removal of the yearly requirement to provide Financial Assurances Report. Being a Federal facility this seems unnecessary.</p>	<p>California Code of Regulations, title 27, section 22236 requires annual adjustments to the preliminary closure/post-closure and corrective action cost estimates to account for inflation. This provision is contained under Article 1 of Subchapter 3, entitled, "General Requirements for Mechanisms." Article 2, entitled "Financial Assurance Mechanisms," contains a list of various acceptable financial assurance mechanisms, including section 22250, which provides for a federal certification. The general requirements in Article 1 apply to the various financial assurance mechanisms allowed under Article 2. Moreover, nothing in title 27 appears to grant any form of special exemption for federal facilities to these general requirements.</p> <p>No changes are proposed in response to this comment.</p>
MCAGCC-08	<p>Pdf page 26. Request clarification on this requirement. What document require the PE. Also, as written this requires "All field activities are to be conducted under the direct supervision of one or more of these professionals." This is an unnecessary burden on the government to have field operations conducted under a PE. Request removal of this portion of the requirement.</p>	<p>California regulations require any report or plan containing engineering or geologic opinions or designs to be prepared under the supervision of a professional engineer or geologist (as appropriate). Supervision means technical staff are performing the work in accordance with the directions of the supervising professional but does not require that the supervising professional be physically present.</p> <p>Standard Provision 12 was not changed in response to this comment.</p>

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MCAGCC-09	Pdf page 29. This page appears to be leftover from some unrelated order (top left corner). Please remove.	The referenced page was removed as requested.
MCAGCC-10	Pdf page 31. Another page that appears to be leftover from an unrelated order (top left corner). Please remove or correct.	The referenced page was removed as requested.
MCAGCC-11	Pdf page 32. Attachment C includes groundwater data from March 2021. Please update table to include data from June 2020, September 2020 and November 2021.	Staff reviewed four rounds of sampling but chose to include only the most recent data as representative of preexisting conditions for the sake of both brevity and clarity. Including additional data would not change our interpretations regarding the high quality of groundwater under the Facility. We respectfully decline to modify Attachment C in response to this request.
MCAGCC-12	Pdf page 32. Attachment C: Sulfate data is shown as Sulfide. Please correct to read Sulfate	Attachment C was corrected to read "Sulfate."

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MCAGCC-13	<p>Pdf page 34. QA/QC Data – This section is requiring significant information which is redundant to previous requirement “Laboratory Certification”. Requiring name and qualification of laboratory personnel performing analysis on top of showing that the laboratory being used is fully certified.</p> <p>Request QA/QC Data section read – “All quality control / quality assurance (QA/QC) data shall be reported, along with the sample results to which they apply, including the method, equipment, and analytical detection limits, the recovery rates, an explanation of any recovery rate that is less than the QA/QC recovery target, the results of equipment and method blanks, the results of spiked and surrogate samples, the frequency of quality control analyses. Sample results shall be reported unadjusted for blank results or spike recovery. In cases where contaminants are detected in QA/QC samples (i.e., field, trip, or lab blanks), the accompanying sample results shall be appropriately flagged, but the analytical results shall not be adjusted.”</p>	<p>The data requested is routinely provided within a standard laboratory report. Including the laboratory report with the submission of the results will normally satisfy this requirement, if the laboratory is appropriately accredited.</p> <p>However, we agree that requiring the inclusion of the name and qualifications of each laboratory technician is excessive, and the wording in Monitoring and Reporting Program R7-2021-0033, Part I, B.6, Standard Monitoring Provisions has been changed so that this information “shall be provided upon request.”</p>
MCAGCC-14	<p>Pdf page 48. Part III, B, 2 – have the background values not been determined by the four quarters of ground water monitoring which were provided?</p>	<p>Background values can change over time, as has been observed at other facilities. Requiring re-evaluation of the background values on a periodic basis is a requirement of title 27, as detailed in MRP Part III, A.2.c.</p> <p>No changes are proposed in response to this comment.</p>

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MCAGCC-15	<p>General comment. We request a table/list of required reports as they are sporadically listed throughout the document and we want to ensure we do not miss anything as some of the reporting will require external contracting.</p>	<p>It is not standard practice to provide a list of submittals as part of a WDRs/MRP, and any such list would not relieve the Discharger from the duty to submit any documents inadvertently omitted from a list prepared by Regional Water Board staff.</p> <p>No changes are proposed in response to this comment.</p>