



Winston H. Hickox  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board

## Los Angeles Region

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Gray Davis  
Governor

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September 13, 2001

Mr. Brian Gordon, Water Program Director,  
U.S. Department of the Navy, Environmental Department N4512  
33000 Nixie Way, Building 50, Suite 326  
San Diego, CA 92147-5110

Dear Mr. Gordon:

### EXTENDING MONTHLY MONITORING – DEPARTMENT OF THE NAVY, SAN CLEMENTE ISLAND WASTEWATER TREATMENT PLANT (NPDES PERMIT NO. CA0110175, CI-6432)

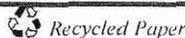
Regional Board Order No. 00-090 (permit) contains Waste Discharge Requirements for your discharge of treated domestic wastewater to the Pacific Ocean from a package wastewater treatment plant, located at the Naval Auxiliary Landing Field, San Clemente Island, Los Angeles County. Under *Monitoring and Reporting Program No. 6432 (M&RP)*, which is a part of the permit, you were required to conduct monthly analyses for a number of compounds during the first 12 months from the effective date of the permit albeit the frequencies prescribed for those compounds are quarterly, semi-annually or annually. The permit became effective on June 29, 2000. Since the 12-month period had passed, your staff requested to return to the prescribed monitoring frequencies for those compounds.

On August 10, 2001, your staff submitted the 12-month summary of the analytical results for those compounds requiring monthly monitoring (from July 2000 to June 2001) to the Regional Board for consideration. Regional Board staff had reviewed the data submitted and found the following deficiencies:

1. Analytical results for acrolein, acrylonitrile and 1,2-diphenylhydrazine are missing from the lab reports.
2. The reporting requirement in Section I.9, page T-3, of the *M&RP* was not complied with for Minimum Levels (*State Implementation Policy*, March 2, 2000, excerpt attached) for most of the volatile organics, semi-volatile organics, and pesticides.
3. The ammonia monthly average limit of 0.6 mg/L has been exceeded seven times (July, August, and December in 2000, and January, April, May, and June in 2001) during the 12-month period.
4. The chronic toxicity of 1 TUc has been consistently exceeded during the 12-month period.

### California Environmental Protection Agency

\*\*\*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption\*\*\*  
\*\*\*For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>\*\*\*



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Brian Gordon  
U.S. Department of the Navy  
San Clemente Island Wastewater Treatment Plant

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September 13, 2001

To confirm the verbal directions of Board staff member Dr. Jau Ren Chen to your staff, Mr. Lance Becker, on or about August 21, 2001, you are hereby required to continue conducting monthly sampling for ammonia, volatile organics, semi-volatile organics, and pesticides for the next six months using the appropriate minimum levels and reporting procedures. In the event that you can not attain a particular minimum level for a given compound, please submit a request with justifications to the Regional Board for a higher reporting limit (see Section I.9, page T-3, of *M&RP*).

Because of the consistent exceedances of chronic toxicity, you are hereby directed to submit by October 10, 2001 a Toxicity Reduction Evaluation (TRE) workplan to the Regional Board for approval. You shall use EPA Manual EPA/833B-99/002, *Toxicity Reduction Evaluation Guidance for Municipal Wastewater Treatment Plants*, as reference. This workplan shall include the reasonable steps to identify the source(s) of toxicity and describe all reasonable steps necessary to reduce toxicity to the required level.

One of the conditions set forth in the State Water Resources Control Board's Resolution No. 77-11 that approved the Navy's request to continue discharging treated wastewater into the receiving water surrounding San Clemente Island, an Area of Special Biological Significance (ASBS), is the demonstration of compliance with the water quality objectives and effluent quality requirements for waste discharges contained in the California Ocean Plan. Violations of permit limits and Ocean Plan toxicity objective are grounds for termination of your discharge to the ASBS. You are therefore directed to submit by November 30, 2001, a workplan with timetable on how you would comply with all the requirements of the permit, or how you would terminate the discharge to the ASBS.

Finally, pursuant to § 13385 of the California Water Code, you are subject to enforcement action, including administrative civil liability (penalties), for your violation(s) of the NPDES permit. Penalties may be assessed at a rate of \$10,000 per day for each violation, and up to \$10/gallon of discharge. Penalties may accrue from the date the violation first occurred, and may be assessed without further warning.

If you have any questions on this matter, please contact Dr. Jau Ren Chen at (213) 576-6656.

Sincerely,



Dennis A. Dickerson  
Executive Officer

Enclosures

***California Environmental Protection Agency***

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Mr. Brian Gordon  
U.S. Department of the Navy  
San Clemente Island Wastewater Treatment Plant

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September 13, 2001

cc: Mr. Michael Lauffer, Office of Chief Counsel, State Water Resources Control Board  
Mr. Robert Sams, Office of Chief Counsel, State Water Resources Control Board  
Mr. Jim Kassel, Division of Water Quality, State Water Resources Control Board  
Mr. Frank Palmer, Division of Water Quality, State Water Resources Control Board

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## APPENDIX 4

### SWRCB Minimum Levels in ppb ( $\mu\text{g/L}$ )

The Minimum Levels (MLs) in this appendix are for use in reporting and compliance determination purposes in accordance with section 2.4 of this Policy. These MLs were derived from data for priority pollutants provided by State certified analytical laboratories in 1997 and 1998. These MLs shall be used until new values are adopted by the SWRCB and become effective. The following tables (Tables 2a - 2d) present MLs for four major chemical groupings: volatile substances, semi-volatile substances, inorganics, and pesticides & PCBs.

Table 2a - VOLATILE SUBSTANCES*	GC	GCMS
1,1 Dichloroethane	0.5	1
1,1 Dichloroethene	0.5	2
1,1,1 Trichloroethane	0.5	2
1,1,2 Trichloroethane	0.5	2
1,1,2,2 Tetrachloroethane	0.5	1
1,2 Dichlorobenzene (volatile)	0.5	2
1,2 Dichloroethane	0.5	2
1,2 Dichloropropane	0.5	1
1,3 Dichlorobenzene (volatile)	0.5	2
1,3 Dichloropropene (volatile)	0.5	2
1,4 Dichlorobenzene (volatile)	0.5	2
Acrolein	2.0	5
Acrylonitrile	2.0	2
Benzene	0.5	2
Bromoform	0.5	2
Bromomethane	1.0	2
Carbon Tetrachloride	0.5	2
Chlorobenzene	0.5	2
Chlorodibromo-methane	0.5	2
Chloroethane	0.5	2
Chloroform	0.5	2
Chloromethane	0.5	2
Dichlorobromo-methane	0.5	2
Dichloromethane	0.5	2
Ethylbenzene	0.5	2
Tetrachloroethene	0.5	2
Toluene	0.5	2
trans-1,2 Dichloroethylene	0.5	1
Trichloroethene	0.5	2
Vinyl Chloride	0.5	2

\*The normal method-specific factor for these substances is 1, therefore, the lowest standard concentration in the calibration curve is equal to the above ML value for each substance.

Table 2b - SEMI-VOLATILE SUBSTANCES*	GC	GCMS	LC	COLOR
1,2 Benzanthracene	10	5		
1,2 Dichlorobenzene (semivolatile)	2	2		
1,2 Diphenylhydrazine		1		
1,2,4 Trichlorobenzene	1	5		
1,3 Dichlorobenzene (semivolatile)	2	1		
1,4 Dichlorobenzene (semivolatile)	2	1		
2 Chlorophenol	2	5		
2,4 Dichlorophenol	1	5		
2,4 Dimethylphenol	1	2		
2,4 Dinitrophenol	5	5		
2,4 Dinitrotoluene	10	5		
2,4,6 Trichlorophenol	10	10		
2,6 Dinitrotoluene		5		
2- Nitrophenol		10		
2-Chloroethyl vinyl ether	1	1		
2-Chloronaphthalene		10		
3,3' Dichlorobenzidine		5		
3,4 Benzofluoranthene		10	10	
4 Chloro-3-methylphenol	5	1		
4,6 Dinitro-2-methylphenol	10	5		
4- Nitrophenol	5	10		
4-Bromophenyl phenyl ether	10	5		
4-Chlorophenyl phenyl ether		5		
Acenaphthene	1	1	0.5	
Acenaphthylene		10	0.2	
Anthracene		10	2	
Benzidine		5		
Benzo(a) pyrene(3,4 Benzopyrene)		10	2	
Benzo(g,h,i)perylene		5	0.1	
Benzo(k)fluoranthene		10	2	
bis 2-(1-Chloroethoxyl) methane		5		
bis(2-chloroethyl) ether	10	1		
bis(2-Chloroisopropyl) ether	10	2		
bis(2-Ethylhexyl) phthalate	10	5		
Butyl benzyl phthalate	10	10		
Chrysene		10	5	
di-n-Butyl phthalate		10		
di-n-Octyl phthalate		10		
Dibenzo(a,h)-anthracene		10	0.1	
Diethyl phthalate	10	2		
Dimethyl phthalate	10	2		
Fluoranthene	10	1	0.05	
Fluorene		10	0.1	
Hexachloro-cyclopentadiene	5	5		

Table 2b - SEMI-VOLATILE SUBSTANCES*	GC	GCMS	LC	COLOR
Hexachlorobenzene	5	1		
Hexachlorobutadiene	5	1		
Hexachloroethane	5	1		
Indeno(1,2,3,cd)-pyrene		10	0.05	
Isophorone	10	1		
N-Nitroso diphenyl amine	10	1		
N-Nitroso-dimethyl amine	10	5		
N-Nitroso -di n-propyl amine	10	5		
Naphthalene	10	1	0.2	
Nitrobenzene	10	1		
Pentachlorophenol	1	5		
Phenanthrene		5	0.05	
Phenol **	1	1		50
Pyrene		10	0.05	

\* With the exception of phenol by colorimetric technique, the normal method-specific factor for these substances is 1000, therefore, the lowest standard concentration in the calibration curve is equal to the above ML value for each substance multiplied by 1000.

\*\* Phenol by colorimetric technique has a factor of 1.

Table 2c – INORGANICS*	FAA	GFAA	ICP	ICPMS	SPGFAA	HYDRIDE	CVAA	COLOR	DCP
Antimony	10	5	50	0.5	5	0.5			1000
Arsenic		2	10	2	2	1		20	1000
Beryllium	20	0.5	2	0.5	1				1000
Cadmium	10	0.5	10	0.25	0.5				1000
Chromium (total)	50	2	10	0.5	1				1000
Chromium VI	5							10	
Copper	25	5	10	0.5	2				1000
Cyanide								5	
Lead	20	5	5	0.5	2				10,000
Mercury				0.5			0.2		
Nickel	50	5	20	1	5				1000
Selenium		5	10	2	5	1			1000
Silver	10	1	10	0.25	2				1000
Thallium	10	2	10	1	5				1000
Zinc	20		20	1	10				1000

\* The normal method-specific factor for these substances is 1, therefore, the lowest standard concentration in the calibration curve is equal to the above ML value for each substance.

Table 2d - PESTICIDES – PCBs*	GC
4,4'-DDD	0.05
4,4'-DDE	0.05
4,4'-DDT	0.01
a-Endosulfan	0.02
a-Hexachloro-cyclohexane	0.01
Aldrin	0.005
b-Endosulfan	0.01
b-Hexachloro-cyclohexane	0.005
Chlordane	0.1
d-Hexachloro-cyclohexane	0.005
Dieldrin	0.01
Endosulfan Sulfate	0.05
Endrin	0.01
Endrin Aldehyde	0.01
Heptachlor	0.01
Heptachlor Epoxide	0.01
Lindane(g-Hexachloro-cyclohexane)	0.02
PCB 1016	0.5
PCB 1221	0.5
PCB 1232	0.5
PCB 1242	0.5
PCB 1248	0.5
PCB 1254	0.5
PCB 1260	0.5
Toxaphene	0.5

\* The normal method-specific factor for these substances is 100, therefore, the lowest standard concentration in the calibration curve is equal to the above ML value for each substance multiplied by 100.

**Techniques:**

GC - Gas Chromatography

GCMS - Gas Chromatography/Mass Spectrometry

HRGCMS - High Resolution Gas Chromatography/Mass Spectrometry (i.e., EPA 1613, 1624, or 1625)

LC - High Pressure Liquid Chromatography

FAA - Flame Atomic Absorption

GFAA - Graphite Furnace Atomic Absorption

HYDRIDE - Gaseous Hydride Atomic Absorption

CVAA - Cold Vapor Atomic Absorption

ICP - Inductively Coupled Plasma

ICPMS - Inductively Coupled Plasma/Mass Spectrometry

SPGFAA - Stabilized Platform Graphite Furnace Atomic Absorption (i.e., EPA 200.9)

DCP - Direct Current Plasma

COLOR - Colorimetric