CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

ERRATA SHEET
TENTATIVE ORDER NO. R9-2013-0064
NPDES No. CA0109169
And
TENTATIVE TIME SCHEDULE ORDER NO. R9-2013-0095

WASTE DISCHARGE REQUIREMENTS
FOR THE
UNITED STATES DEPARTMENT OF THE NAVY
NAVAL BASE SAN DIEGO COMPLEX
SAN DIEGO COUNTY

The following changes to the Tentative Order No. R9-2013-0064 and Tentative Time Schedule Order R9-2013-0095, both released June 7, 2013, are based on timely comments received during the public comment period. The changes to the Tentative Order and Tentative Time Schedule Order listed below are shown in underline/strikeout format to indicate added and removed language, respectively.

Global Change to all documents:

Correct all typographical, formatting and grammar errors.

Changes to Tentative Order R9-2013-0064:

1. **Section II.B, pg. 11, Facility and Discharge Description**
   Remove category of discharge number 2 and renumber accordingly. Discharge category number 2 is listed appropriately in Table 5. "Industrial Process Wastewater Discharges from NBSD" and is not needed in the list of discharge categories.

   ~~2. Seawater cooling overboard water discharges from vessels in the US Navy Graving Dock;~~

2. **Section IV.A, Table 11, pg. 25, Effluent Limitations for Emergency Fire Suppression Water and Salt Water Supply Water – Discharge Point No. NGD-004**
   Add the following footnote "b":

   b. The Average Monthly limitation only applies if there is a discharge more than one day in a 30 day period.

3. Section IV.F.2.b, pg. 31, Storm Water Pollution Prevention Plan (SWPPP) Requirements

Requirement clarification:

The SWPPP shall include ~~serve as the framework for~~ identification, assignment, and guidance for implementation of measures and BMPs to control ~~MS4~~ discharges from industrial activities in the Industrial No Exposure, Industrial Low Risk and Industrial High Risk Areas of the NBSD…

4. Section IV.F.3.a.i, pg. 31, Numeric Action Levels (NAL) Exceedance Determination Method

Add the following sentence at the end of the paragraph:

… An annual NAL exceedance occurs when the average of all the analytical results for a parameter from samples taken within a reporting year exceeds an annual NAL value for that parameter listed in Table G-1 (or is outside the NAL pH range). The Discharger has the option of calculating the flow weighted average concentration for all discharge effluent data for the entire facility in the same manner as section IV.E of this Order to compare the corresponding annual NAL values in Table G-1;

5. Section IV.G.1.m, pg. 37, Non-Storm Water Discharges

Delete line "m" and renumber accordingly:

~~**m.** Incidental runoff of from landscaped areas;~~

6. Section IV.G.8, pg. 39, Incidental Runoff from Landscaped Areas

Add new section G.8 as follows:

Incidental Runoff from Landscaped Areas. Incidental runoff is defined as unintended amounts (volume) that escapes the area of intended use. Incidental runoff, not controlled by the following requirements, is prohibited:

a. Detect leaks (e.g. broken sprinkler heads) and correct the leaks within 72 hours of learning of the leak;

b. Properly design and aim sprinkler heads; and

c. Eliminate irrigation during precipitation events.

7. Section VII.H.2, pg. 52, Acute Toxicity

Requirement correction:

For this discharge, the determination of "Pass" or "Fail" from a single-effluent concentration acute~~chronic~~ toxicity test at the IWC of 100 percent effluent is determined using the TST approach described in National Pollutant Discharge Elimination System Test of Significant Toxicity Implementation Document (EPA 833-R-10-003, 2010).

Changes to Tentative Order R9-2013-0064, Attachment A, Definitions:

8. Pg. A-4, Industrial Low Risk Areas

Definition clarification:

All areas where wastes or pollutants from industrial activities are subject to precipitation, run-on, and/or runoff which are not classified as Industrial No Exposure Areas or Industrial High Risk Areas. ~~Industrial Low Risk Areas may include temporary storage areas of non-hazardous waste or work/storage areas that do not contain or generate wastes that may negatively impact water quality.~~

Changes to Tentative Order R9-2013-0064, Attachment C, Flow Schematic:

9. Figure C-6, pg. C-2, Graving Dock Caisson Gate De-Flooding Event Line Drawing

Line drawing correction: ~~180,000~~31,500 Gallons per event

Text Correction: The Caisson Gate discharges ~~180,000~~31,500 gallons of captured bay-water per de-flooding event. The Caisson Gate is de-flooded twice per vessel repair evolution. There may be as few as 2, and as many as 6, evolutions per year. The resulting estimated Caisson Gate discharge ranges from ~~720,000~~63,000 to ~~2.16 million~~189,000 gallons of captured bay-water per year.

10. Figure C-7, pg. C-3, Graving Dock Fire Suppression System Testing Line Drawing

Title Change: Graving Dock Emergency Fire Suppression Water and Salt Water Supply Water ~~System Testing~~ Line Drawing

Line Drawing Correction: ~~67,000~~20 Gallons per Discharge event when supply is initially connected to ship and 2 gallons per minute (leaking past valve) while

connected to ship.~~Quarterly Test for operational testing of pumps and relief valve.~~

Text Correction: When salt water supply is initially connected to the ship there is a short duration discharge from the system's relief valve to San Diego Bay. The discharge duration is approximately 45 seconds with a discharge volume of 20 gallons. After the initial discharge there is a 2 gallon per minute discharge of salt water that leaks past the valve. Based on an average of 3 docking events in a year and a vessel is in the dock for 6 months during the year, the annual discharge volume would be 518, 460 gallons.~~Operational testing occurs once a quarter and only when the dock is empty. A series of pumps are engaged in a sequence building up to a 5 minute test at 3,500 gallons per minute. An estimated total of 67,000 gallons are discharged during each test procedure. There may be 2-4 quarterly test per year, resulting in an estimated discharge range of 134,000 to 268,000 gallons per year.~~

Changes to Tentative Order R9-2013-0064, Attachment E, Monitoring and Reporting Program:

11. Section I-A, pg. E-3, General Monitoring Provisions

Delete the last sentence of the paragraph:

… Monitoring locations shall not be changed without notification to and the approval of this San Diego Water Board. ~~Samples shall be collected at times representative of "worst case" conditions with respect to compliance with the requirements of this Order.~~

12. Section II.B.3, pg. E-5, Industrial Storm Water Monitoring Location Report

Requirement clarification:

A map of monitoring locations for each Industrial High Risk Area and Industrial Low Risk Area storm water discharge point. Where a single drainage area, or similar ~~adjacent~~ drainage areas to the same receiving water, discharge to multiple discharge points, the Discharger may propose a single monitoring location for that drainage area …

13. Section IV.A.1, Table E-3, pg. E-7, Effluent Monitoring for Steam Condensate

Add footnote 5 to the end of the table:

5. The estimated daily flow for each month shall be reported in the semi-annual self-monitoring reports due on August 1 and February 1 of each year.

14. Section IV, Tables E-3 through E-8, pgs. E-7 through E-12, Industrial Process Wastewater Effluent Monitoring Requirements; and Section IX.A.3, Tables E-10 and E-11, pgs. E-28 and E-29, Industrial Storm Water Sampling and Analysis

Change the footnote to "Required Analytical Test Method" for pH to read as follows:

Field test with pre and post calibrated portable instrument, or lab sample in accordance with 40 CFR 136.

15. Section IV, Tables E-4, E-5, and E-6, pgs. E-8 to E-10, Industrial Process Wastewater Effluent Monitoring Requirements

Requirement clarification:

Parameter	Units	Sample Type	Minimum Sampling Frequency[4]	Required Analytical Test Method and (Minimum Level, units), respectively
Flow	GPD	Grab or Estimate	1/day	Estimate

16. Section IV.C, Table E-5, pg. E-9, Effluent Monitoring for Caisson Gate Ballast Water Effluent and Saltwater Supply System Water

Title Correction:

Table E-5. Effluent Monitoring for Caisson Gate Ballast Water Effluent ~~and Saltwater Supply System Water~~

17. Section IV, Tables E-5 and E-6, pgs. E-9 and E-10, Industrial Process Wastewater Effluent Monitoring Requirements

Add the following footnote:

The estimated daily flow for each month shall be reported in the annual self-monitoring reports due on September 1.

18. Section IV.F.1, pg. E-12, Monitoring Locations UV-001 through UV-012 Utility Vault and Manhole Dewatering Monitoring

Requirement correction to the last sentence of the paragraph:

… The manhole discharge ~~and steam vault discharge~~ monitoring location shall be chosen at random and may be different each year.

19. Section V.A.2, pg. E-13, Marine and Estuarine Species and Test Methods

Requirement clarification to the last sentence of the paragraph:

…The Discharger shall conduct a species sensitivity screening for acute toxicity on a representative sample which shall include one vertebrate and one invertebrate during the first required monitoring period ~~episode~~…

20. Section V.A.4, pg. E-14, Acute Toxicity MDEL Exceedance Follow-up Action

Requirement clarification to the last sentence of the paragraph:

…The Discharger shall also conduct an additional acute toxicity test within the same calendar month that the exceedance occurred or, in the event laboratory monitoring results are not received during the same month when the sampling was performed, the next qualifying storm event after receiving results of an exceedance for storm water discharges.

21. Section V.B.1, pg. E-14, Monitoring Frequency for Industrial Process Wastewaters

Edit the Title and text as follows:

Monitoring Frequency for Chronic Toxicity~~Industrial Process Wastewaters~~

The Discharger shall conduct chronic toxicity monitoring at the frequencies specified in Tables E-3 through E-7 and Table E-11.

22. Section V.B.2, pg. E-14, Marine and Estuarine Species and Test Methods

Requirement clarification to the last sentence of the paragraph:

…The Discharger shall conduct a species sensitivity screening for chronic toxicity on a representative sample which shall include one vertebrate, one invertebrate, and one aquatic plant during the first required monitoring period ~~episode~~…

23. Section V.B.4, pg. E-16, Chronic Toxicity MDEL Exceedance Follow-up Action

Requirement clarification to the last sentence of the paragraph:

…The Discharger shall also conduct an additional toxicity test within the same calendar month that the exceedance occurred or, in the event laboratory monitoring results are not received during the same month when the sampling was performed, the next discharge event after receiving results of an exceedance.

24. Section V.B.6, pg. E-15, High Risk Industrial Storm Water

Add section V.B.6 addressing chronic toxicity testing of High Risk Industrial Storm Water:

6. High Risk Industrial Storm Water

The chronic toxicity test results shall be used in the US Navy's study on chronic toxicity described in section VI.C.2.a of the Order. If both the chronic toxicity test results at the end of pipe for high risk industrial storm water and the concurrent receiving water chronic toxicity test result in a "fail", the discharger shall conduct a toxicity reduction evaluation (TRE) as required in section V.E of this MRP. The requirement for a TRE may be waived by the San Diego Water Board on a case-by-case basis if implementation of a previously approved TRE Work Plan is already underway for the sampled discharge point.

25. Section V.E.4, pg. E-18, Toxicity Reduction Evaluation

Add a new section V.E.4 and renumber accordingly:

4. A TRE work plan is required by section V.B.6 of this MRP for a high risk industrial storm water discharge which had a chronic toxicity test and a concurrent receiving water sample test both result in a "fail" and exhibit a percent effect greater than or equal to 0.25.

26. Section VIII.A.1, pg. E-21, Receiving Water and Sediment Monitoring

Revised requirements as requested by the US Navy:

Receiving water and sediment monitoring shall be performed by the Discharger to assess compliance with receiving water limits. The receiving water ~~and sediment~~ monitoring requirements in Monitoring and Reporting Program No. R9-2002-0169 for NBSD and Monitoring and Reporting Program No. R9-2003-0265 shall continue to be implemented until the receiving water ~~and sediment~~ monitoring program in this Order below is implemented.

27. Section VIII.3.b.i(b) pg. E-22, Table E-9, Minimum Receiving Water Monitoring Requirements

Revise Table E-9 for chronic toxicity as follows and revise footnote 4:

Chronic Toxicity	Pass/Fail	Grab	2~~/5~~ Year~~s~~	[4]

4. The Discharger shall monitor chronic toxicity twice per year concurrently with the end of pipe high risk industrial storm water discharge monitoring required in Table E-11 of this MRP~~within the second year of permit adoption and the fifth year following permit adoption~~. The receiving water chronic toxicity sample shall be collected in the receiving water adjacent to the storm drain outfall sampled in Table E-11 during the storm event.

28. Section IX.A.2.b.ii, pg. E-26, Industrial Storm Water Discharge and Other Visual Observations

Requirement clarification:

From a storm event that was preceded by ~~72 hours~~three calendar days of dry weather. Dry weather shall be defined as ~~72 hours~~three calendar days of combined rainfall of less than 1/10 inch as measured by an on-site rainfall measurement device.

29. Section IX.A.3.e, pg. E-27, Industrial Storm Water Sampling and Analysis

Requirement clarification:

In the event that the first QSE in a ~~wet season~~semi-annual period does not produce a discharge that can be sampled at one or more sampling locations, the Discharger shall record which sampling locations were observed that did not discharge, and collect samples from those locations ~~from~~ during the next QSE(s) that produces a discharge in that semi-annual period ~~wet season~~…

30. Section IX.A.3, Table E-11, pg. E-30, Monitoring Requirements for Storm Water Discharges from "Industrial High Risk" Areas

Add the following to Table E-11 and edit footnote 3 and add footnote 5:

Chronic Toxicity[3, 5]	Pass or Fail	Grab or Composite	One storm per semiannual period.	[2]

3. The presence of acute or chronic toxicity in the storm water shall be determined as specified in section V of this MRP.

5. Chronic toxicity will be sampled at one representative high risk industrial storm water discharge location.

31. Section IX.A.5, pg. E-31, Visual Observation and Sample Collection Exceptions and Methods

Requirement clarification:

The Discharger shall be prepared to collect samples and conduct visual observations at the beginning of the ~~wet season~~semi-annual period ~~(October 1 through May 31)~~ and throughout ~~the wet season~~ until the minimum requirements of sections IX.A.2 and IX.A.3 of this MRP are completed with the following exception:

32. Section IX.A.5.c, pg. E-32, Visual Observations and Sample Collection Exceptions and Methods

Requirement clarification to the first sentence:

The Discharger shall ensure that all industrial storm water discharge sampling locations are representative of ~~only those~~ drainage areas associated with industrial activities, where practicable. …

33. Section IX.B, pg. E-32, Non-industrial Storm Water Monitoring for Small Municipal (Military Base Separate Storm Sewer System (MS4) Areas

Revised requirements:

1. Within ~~12~~ 24 months of the effective date of this Order, the Discharger shall prepare and submit to the San Diego Water Board a written plan for monitoring pollutants in non–industrial storm water discharges from Small Municipal (Military Base) Separate Storm Sewer System (MS4) Areas. The monitoring plan shall include the following information: …

   c. … A minimum subset of ~~five~~ three representative monitoring locations for storm water and dry-weather discharges within the Small MS4 Areas of the NBSD Complex. These monitoring locations shall be sampled for pollutants identified by the Discharger. …

Changes to Tentative Order R9-2013-0064, Attachment F, Fact Sheet

34. Section II.A.5.b, pg. F-17, USN Graving Dock Deflooding Water

Text addition:

Pollutants that may be found in the discharge may include but are not limited to any contaminants that the water from San Diego Bay comes into contact with as it enters the dry dock, any contaminants already in the water from San Diego Bay, and any contaminants that leach off a docking/undocking vessel's anti-fouling paint.

Changes to Tentative Order R9-2013-0064, Attachment G, Storm Water Pollution Prevention Plan (SWPPP) Requirements for Industrial Areas

35. Section X, Table G-1, pg. G-12, NALs for Storm Water

Revised footnote 2:

2. Effluent samples shall be analyzed for copper according to 40 CFR part 136. ~~method 1638 or 1640~~. ~~The commonly used methods 6010B (Inorganics by ICP-Atomic Emission Spectroscopy) and 200.7 (Trace Elements-ICP) have been found to give inaccurate copper readings in saline-matrix samples due to interference with the sodium-argon complex, which has a molecular weight similar to copper. Method 1638 (ICP/MS) or 1640 (On-Line Chelation) will eliminate the sodium-argon complex before the sample is tested for copper. No inaccurate readings for other metals in a saline-matrix sample analyzed by methods 6010B or 200.7 are known~~

Changes to Tentative Order R9-2013-0064, Attachment I, Best Management Practices …:

36. Section II, pg. I-1, Purpose

Requirement clarification to the last sentence:

… The BMP Plan shall address at a minimum pier boom, fender, and mooring cleaning, US Navy Gg~~g~~raving ~~d~~Dock pre-flood cleaning, seawater cooling and overboard discharges (for vessels in the Graving Dock), and weight testing water.

37. Section III.C, pg. I-1, Objectives

Requirement clarification to the second sentence:

… The evaluation shall include all normal operations and ancillary activities at a minimum related to pier boom, fender, and mooring cleaning~~, pier cleaning~~, US Navy graving dock flooding, and weight test water and any other activities which have the potential to discharge pollutants. …

Changes to Tentative Time Schedule Order R9-2013-0095:

38. Finding 1, pg. 1, NPDES permit Reissuance

Text addition:

… The discharges include graving dock saltwater supply system water; graving dock flood dewatering; graving dock caisson gate ballast water; industrial storm water; steam condensate; pier boom, fender, and mooring cleaning; utility vault and manhole dewatering; ~~and~~ storm water from a Small Municipal Separate Storm Sewer System (MS4); and seawater cooling overboard discharges from vessels in the graving dock.

39. Finding 8.b, pg.3, Graving Dock Caisson Ballast Dewatering

Text revision to the last sentence:

The Discharger's schedule for completing the feasibility study and implementing its recommendations indicates compliance could be achieved as early as May 1, 2014. However, if extensive infrastructure changes are required, achieving compliance could be delayed to May 1, 2017 to allow time to obtain funding and contracting services~~will be achieved by September 30, 2014.~~ .