

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD SAN DIEGO REGION

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**REVISED TENTATIVE TIME SCHEDULE ORDER NO. R9-2015-0118
REQUIRING
THE UNITED STATES DEPARTMENT OF THE NAVY
NAVAL BASE CORONADO
TO COMPLY WITH REQUIREMENTS PRESCRIBED IN
ORDER NUMBER R9-2015-0117
NPDES PERMIT NO. CA0109185**

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board), finds:

FACTUAL BACKGROUND

1. The U.S. Department of the Navy (Navy or Discharger) is the owner and operator of Naval Base Coronado (NBC or Facility), a U.S. Naval Base. The regulated discharges included wastewater from the following sources/activities:
 - Steam condensate;
 - Diesel engine cooling water;
 - Utility vault and manhole dewatering,
 - Pier washing
 - Industrial storm water; and
 - Small Military Base Municipal Separate Storm Sewer (MS4).
2. This Time Schedule Order (TSO) applies only to discharges of steam condensate and diesel engine cooling water.
3. The Facility discharges to San Diego Bay, the Tijuana River Estuary¹, and the Pacific Ocean, Waters of the U.S., under waste discharge requirements contained in Order No. R9-2015-0117, adopted by the San Diego Water Board on November 18, 2015. Order No. R9-2015-0117 also serves as a permit under the National Pollutant Discharge Elimination System (NPDES No. Permit CA0109185).
4. The discharges from the Facility were previously regulated under Order No. R9-2009-0081 as modified by Order No. R9-2010-0057.
5. Title 40, Code of Federal Regulations (40 CFR) section 122.44(d)(1)(i) requires effluent limitations to control all pollutants or pollutant parameters that may be discharged at a level that will cause, have reasonable potential to cause, or contribute to an excursion above any state water quality standards. The San Diego Water Board conducted a reasonable potential analysis (RPA) to reevaluate the need for effluent limitations for certain pollutants. Final RPA results demonstrated that effluent limitations were required

¹ No discharges to the Tijuana River Estuary are implicated in this Time Schedule Order.

for the parameters shown in Tables 1 and 2. Order No. R9-2015-0117 establishes effluent limitations based on the applicable water quality objectives at the point of discharge.

- Section IV.A.2 of Order No. 2015-0117 prescribes effluent limitations for the discharge of steam condensate via Discharge Point Nos. SC-001 through SC-010 as shown in Table 1 below. Table 1 also includes the maximum effluent concentrations for the constituents listed as determined from effluent data from July 2009 through January 2014.

Table 1. Effluent Limitations and Data for Steam Condensate

Parameter	Units	Effluent Limitations				Maximum Effluent Concentration
		6-Month Median	Average Monthly	Maximum Daily	Instantaneous Maximum	
Discharges to the San Diego Bay – Discharge Point Nos. SC-001 through SC-009						
Copper, Total Recoverable	µg/L	--	1.9	5.8	--	170
Lead, Total Recoverable	µg/L	--	3.4	12	--	16
Zinc, Total Recoverable	µg/L	--	47	95	--	1,100
2,3,7,8-tetrachlorodibenzo- <i>p</i> -dioxin (2,3,7,8-TCDD)	µg/L	--	1.4x10 ⁻⁸	2.8x10 ⁻⁸	--	1.14x10 ⁻⁶
Bis(2-Ethylhexyl) Phthalate	µg/L	--	5.9	12	--	16
Aldrin	µg/L	--	0.00014	0.00028	--	0.01
Heptachlor	µg/L	--	0.00021	0.00042	--	0.02
Heptachlor Epoxide	µg/L	--	0.00011	0.00022	--	0.1
Discharges to the Pacific Ocean – Discharge Point No. SC-010						
Copper, Total Recoverable	µg/L	3	--	5.8	30	170
Lead, Total Recoverable	µg/L	2	--	8	20	16
Zinc, Total Recoverable	µg/L	20	--	80	200	1,100
TCDD Equivalents	µg/L	--	3.9x10 ⁻⁹	--	--	1.18x10 ⁻⁶
Bis(2-Ethylhexyl) Phthalate	µg/L	--	3.5	--	--	16

- Section IV.3 of Order No. 2015-0117 prescribes effluent limitations for the discharge of diesel engine cooling water via Discharge Point No. CW-001 as shown in Table 2 below. Table 2 also includes the maximum effluent concentrations for the constituents listed as determined from effluent data from July 2009 through January 2014.

Table 2. Effluent Limitations and Data for Diesel Engine Cooling Water

Parameter	Units	Effluent Limitations			
		Average Monthly	Maximum Daily	Instantaneous Maximum	Maximum Effluent Concentration
Arsenic, Total Recoverable	µg/L	20	62	--	84
Chromium VI, Total Recoverable	µg/L	27	85	--	150
Copper, Total Recoverable	µg/L	2.0	5.8	--	280
Lead, Total Recoverable	µg/L	5.8	15	--	16
Nickel, Total Recoverable	µg/L	5.7	15	--	46
Zinc, Total Recoverable	µg/L	37	95	--	380
4,4-DDT	µg/L	0.00059	0.0017	--	0.039
4,4-DDE	µg/L	0.00059	0.0012	--	0.018
4,4-DDD	µg/L	0.00084	0.0017	--	0.021

8. Order No. R9-2015-0117 requires immediate compliance with all effluent limits beginning on its effective date on January 1, 2016.
9. Immediate compliance with the proposed effluent limitations for the parameters shown in Tables 1 and 2 is infeasible.
10. The Discharger's monitoring data indicates that wastewater discharged from the steam condensate and diesel engine cooling water chronically violates the effluent limitations in Order No. R9-2009-0081 as modified by Order No. R9-2010-0057. Given that effluent limits in Order No. R9-2015-0117 are at least as stringent as the previous permit, the San Diego Water Board finds that the steam condensate and diesel engine waste water discharges from the Facility are threatening to violate waste discharge requirements.
11. This TSO provides the Discharger a schedule to develop and implement methods of compliance with the effluent limitations in Order No. R9-2015-0117.
12. The Discharger has reported that its preferred method for achieving compliance with the effluent limitations is to terminate steam condensate and diesel engine cooling water discharges. To implement this compliance alternative, the Discharger needs to design and construct new facilities, retrofit existing facilities, retrofit existing processes, implement new and significantly-expanded compliance programs, and secure funding for these activities.
13. On September 4, 2015, the Discharger proposed a schedule to implement the necessary upgrades to comply with the requirements of Order No. R9-2015-0117 within 3 years of adoption of this TSO. The Discharger reported that the schedule represents a realistic assessment of the shortest practicable time period achievable for implementing the compliance alternatives, recognizing uncertainties associated with activities or approvals that are outside the Discharger's control.

LEGAL BASIS

14. Water Code section 13300 states:

“Whenever a regional board finds that a discharge of waste is taking place or threatening to take place that violates or will violate requirements prescribed by the regional board, or the state board, or that the waste collection, treatment, or disposal facilities of a discharger are approaching capacity, the board may require the discharger to submit for approval of the board, with such modifications as it may deem necessary, a detailed time schedule of specific actions the discharger shall take in order to correct or prevent a violation of requirements.”
15. A review of effluent data indicates that discharges of steam condensate and diesel engine cooling water from the Facility may not consistently achieve compliance with the final effluent limitations for the parameters listed in Tables 1 and 2 of this TSO. Accordingly, pursuant to Water Code section 13300, a discharge of waste threatens to take place that would violate requirements in Order No. R9-2015-0117 prescribed by the San Diego Water Board.
16. The Discharger is unable to comply with effluent limitations in Order No. R9-2015-0117 for the parameters listed in Tables 1 and 2 of this TSO. It is necessary for the Discharger to implement new or modified control measures to comply with the effluent limitations in Order No. R9-2015-0117.
17. Pursuant to Water Code section 13300, this TSO is being issued to set forth specific actions that the Discharger shall take to correct or prevent discharges of steam condensate and diesel engine cooling waste water that violate Order No. R9-2015-0117.
18. This TSO includes interim requirements and the dates for their achievement. The interim requirements include both an interim maximum daily effluent limitations based on the maximum effluent concentration for the parameters listed in Tables 1 and 2 as well as actions and milestones leading to compliance with the final effluent limitations for these pollutants. This TSO has established a final compliance date that is as short as possible based on the Discharger’s September 4, 2015, compliance schedule submittal.
19. Pursuant to Water Code sections 13263.3(a), (d)(1)(D), and (d)(3), the Legislature finds and declares that pollution prevention should be the first step in a hierarchy for reducing pollution and managing wastes, and to achieve environmental stewardship for society. The Legislature also finds and declares that pollution prevention is necessary to support the federal goal of zero discharge of pollutants into navigable waters. The San Diego Water Board may require a discharger subject to its jurisdiction to complete and implement a pollution prevention plan if the discharger is subject to a time schedule order issued pursuant to Water Code section 13300 or 13308. This TSO requires the Discharger to develop and implement a pollution prevention plan for steam condensate and diesel engine cooling water.
20. Issuance of this Order is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, section 21000 *et seq.*; CEQA) pursuant to Water

Code section 13389, since the adoption or modification of an NPDES permit for an existing source is statutorily exempt and this Order only serves to implement an NPDES permit (*Pacific Water Conditioning Ass'n, Inc. v. City Council of City of Riverside* (1977) 73 Cal.App.3d 546, 555-556.).

21. The San Diego Water Board notified the Discharger and interested agencies and persons of its intent to issue this TSO concerning compliance with waste discharge requirements (WDRs) and provided them with an opportunity to submit their written comments and recommendations pursuant to Water Code section 13167.5.
22. The San Diego Water Board, in a public meeting, heard and considered all comments on this matter.

IT IS HEREBY ORDERED that, pursuant to the Water Code sections 13300 and 13385(j)(3), the Discharger, as operator of the Facility, shall comply with the time schedules set forth below to ensure compliance with the effluent limitations of Order No. R9-2015-0117, NPDES Permit No. CA0109185. Except as modified or superseded by the TSO requirements and provisions set forth below, all of the findings, prohibitions, provisions, and other requirements of Order No. R9-2015-0117, NPDES Permit No. CA0109185 remain in full force and effect.

A. INTERIM EFFLUENT LIMITATIONS

Except as modified or superseded by the interim effluent limitations set forth in Tables 3 and 4 below, all of the effluent limitations in Order No. R9-2015-0117 remain in full force and effect:

- 1. Steam Condensate Interim Effluent Limitations.** The Discharger shall comply with the following interim effluent limitations for discharges of steam condensate from Discharge Points No. SC-001 through SC-010 on the effective date of this TSO.

Table 3. Interim Effluent Limitations for Steam Condensate

Parameter	Units	Interim Effluent Limitations
		Maximum Daily
Discharges to the San Diego Bay – Discharge Point Nos. SC-001 through SC-009		
Copper, Total Recoverable	µg/L	170
Lead, Total Recoverable	µg/L	16
Zinc, Total Recoverable	µg/L	1,100
2,3,7,8-TCDD	µg/L	1.14x10 ⁻⁶
Bis(2-Ethylhexyl)Phthalate	µg/L	16
Aldrin	µg/L	0.01
Heptachlor	µg/L	0.02
Heptachlor Epoxide	µg/L	0.1
Discharges to the Pacific Ocean – Discharge Point No. SC-010		
Copper, Total Recoverable	µg/L	170
Lead, Total Recoverable	µg/L	16
Zinc, Total Recoverable	µg/L	1,100
TCDD Equivalents	µg/L	1.14x10 ⁻⁶
Bis(2-Ethylhexyl)Phthalate	µg/L	16
Aldrin	µg/L	0.01
Heptachlor	µg/L	0.02
Heptachlor Epoxide	µg/L	0.1

- 2. Diesel Engine Cooling Water Interim Effluent Limitations.** The Discharger shall comply with the following interim effluent limitations for discharges of diesel engine cooling water from Discharge Point No. CW-001 on the effective date of this TSO.

Table 4. Interim Effluent Limitations for Diesel Engine Cooling Water at Discharge Point CW-001

Parameter	Units	Interim Effluent Limitations
		Maximum Daily
Arsenic, Total Recoverable	µg/L	84
Chromium VI, Total Recoverable	µg/L	150
Copper, Total Recoverable	µg/L	280
Lead, Total Recoverable	µg/L	16
Nickel, Total Recoverable	µg/L	46
Zinc, Total Recoverable	µg/L	380
4,4-DDT	µg/L	0.039
4,4-DDE	µg/L	0.018
4,4-DDD	µg/L	0.021

B. COMPLIANCE SCHEDULE

The Discharger shall complete all compliance tasks no later than the specified dates set forth in in Table 5 below.

Table 5. Time Schedule

Task No.	Compliance Date	Compliance Task
1	March 30, 2016	Award of Energy Savings Performance Contract (ESPC) for decentralization of the NASNI steam system.
2	March 30, 2016	Complete design for diversion of diesel engine cooling water to sewer.
3	January 31, 2017	Design package deliverable to Navy for Steam decentralization.
4	January 31, 2017	Start construction of piping to divert diesel engine cooling water.
5	November 30, 2017	Temporary decentralized boilers installed and operational.
6	November 30, 2017	Construct piping to divert diesel engine cooling water.
7	February 28, 2018	Decentralize steam service from all piers and cease steam condensate discharges.
8	February 28, 2018	Complete diesel engine cooling water diversion.

C. POLLUTION PREVENTION PLAN

The Discharger shall prepare and submit a pollution prevention plan work plan with a time schedule for implementation for approval of the Executive Officer within 120 days of adoption of this TSO, pursuant to Water Code section 13263.3(d)(3). This pollution prevention plan shall be implemented within 180 days of adoption of this TSO.

D. COMPLIANCE SCHEDULE REPORTING REQUIREMENTS

1. The Discharger shall prepare and submit quarterly progress reports of efforts taken by the Discharger towards completing the milestones specified in Table 5 of this TSO and terminating the discharge of steam condensate and diesel engine cooling water. The reports shall summarize 1) the progress to date; 2) details of compliance or noncompliance with specific dates and tasks; 3) the activities conducted during that quarter; 4) the activities planned for the upcoming quarters; 5) information regarding all delays encountered or anticipated that may affect the future schedule for completion of the actions required; and 6) a description of all efforts made to mitigate those delays or anticipated delays. The reports shall also state whether or not the Facility was in compliance with the interim effluent limitations during the reporting period. Each quarterly report shall be submitted to the San Diego Water Board with the NPDES quarterly monitoring reports in accordance with Table E-8 of Attachment E to Order No. R9-2015-00117.
2. If noncompliance with the schedule in Table 5 above occurs, the Discharger shall report a description of the noncompliance and its cause, steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance; and the anticipated time the noncompliance is expected to continue by the compliance task date. The Discharger shall also notify the San Diego Water Board within 30 days by letter when it returns to compliance with the time schedule.

E. PROVISIONS

1. All technical and monitoring reports required by this TSO are in accordance with Water Code sections 13267 and 13383. The San Diego Water Board needs this information to determine compliance with the TSO and Order No. R9-2015-0117. The Discharger is already subject to similar reporting requirements pursuant to Order No. R9-2015-0117. Therefore, the burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports.
2. Reports submitted under this TSO shall be signed as required by Attachment D, Standard Provisions V.B of Order No. R9-2015-0117 and shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those

persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

3. If the Discharger fails to comply with any provision of this TSO, the San Diego Water Board may take any further action authorized by law. The Executive Officer, or his/her delegee, is authorized to take appropriate enforcement action pursuant, but not limited to, Water Code sections 13350 and 13385. The San Diego Water Board may also refer any violations to the Attorney General for judicial enforcement, including injunction and civil monetary remedies.
4. The San Diego Water Board may reopen this TSO at its discretion or at the request of the Discharger, if warranted. Lack of progress towards compliance with this TSO may be cause for the San Diego Water Board to modify the conditions of this TSO.
5. This TSO becomes effective on January 1, 2016 and expires on March 1, 2018.

I, David W. Gibson, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an order adopted by the California Regional Water Quality Control Board, San Diego Region, on November 18, 2015.

David W. Gibson
Executive Officer