

EXECUTIVE OFFICER SUMMARY REPORT
December 14, 2016

- ITEM: 7
- SUBJECT: Public Hearing: NPDES Permit Reissuance: Waste Discharge Requirements for General Dynamics National Steel and Shipbuilding Company (NASSCO) Discharge to San Diego Bay (Tentative Order No. R9-2016-0116, NPDES No. CA0109134) (*Kristin Schwall*)
- PURPOSE: To receive public testimony and consider adoption of Tentative Order No. R9-2016-0116 (Tentative Order).
- RECOMMENDATION: Adoption of the Tentative Order (**Supporting Document No. 1**) is recommended.
- KEY ISSUES:
1. The Tentative Order requires monitoring of “high risk” industrial storm water discharges for comparison with Numeric Action Levels (NALs), consistent with the *General Permit for Storm Water Discharges Associated with Industrial Activities* (General Industrial Storm Water Permit), Order No. 2014-0057-DWQ, and the U.S. Environmental Protection Agency (U.S.EPA) *Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP)*.
 2. The Tentative Order establishes chronic toxicity effluent limitations for “high risk” industrial storm water discharges and numeric effluent limitations for discharges of hydrostatic relief water, building ways flood water, and flood water from the graving dock.
 3. The Tentative Order requires the use of best management practices (BMPs) to prevent the discharge of pollutants via dry dock ballast water, dry dock flood water, fire protection water, potable water, and steam condensate.
 4. The Tentative Order requires the development and implementation of a sediment and receiving water monitoring program, consistent with the State Water Board’s *Water Quality Control Plan for Enclosed Bays and*

Estuaries – Part 1 Sediment Quality (Sediment Quality Plan).

PRACTICAL VISION: Consistent with the mission of the *Strategy for Healthy Waters* chapter of the Practical Vision, the Tentative Order integrates all applicable technology-based requirements, water quality-based effluent limitations, and receiving water quality standards in order to optimize protection of water quality and beneficial uses in San Diego Bay. Additionally, the Tentative Order has provisions allowing for participation in regional monitoring and assessment programs in keeping with San Diego Water Board Resolution No. R9-2012-0069, *Resolution in Support of a Regional Monitoring Framework*.

DISCUSSION: NASSCO is a shipyard in the Marine Systems group of General Dynamics Corporation, located at 2798 East Harbor Drive in San Diego, California. NASSCO provides a full range of ship construction, conversion, and repair capabilities to the U.S. Navy and other commercial customers. The facility is located on 85 acres of land and 48 acres of water (133 acres in total) on the eastern waterfront of central San Diego Bay. The property is leased from the San Diego Unified Port District. (**Supporting Document No. 2, Location Map**). The facility includes various production workshops and assembly areas, concrete platens used for steel fabrication, a floating dry dock, a graving dock (building dock), two building ways, twelve berths, and a blast and paint facility.

All hydrostatic relief water from the building ways and graving dock as well as flood water from the building ways are directed to an ion exchange treatment system to remove pollutants including copper, nickel, and zinc. The Tentative Order includes numeric effluent limitations for discharge of ion exchange treatment system effluent to San Diego Bay.

Flood water from the graving dock is regulated with numeric effluent limitations including limitations for chronic toxicity, copper, and zinc. NASSCO implements BMPs, including extensive sweeping and cleaning of graving dock surfaces prior to flooding, to achieve compliance with these numeric effluent limitations.

NASSCO operates and maintains a storm water diversion system that is designed to capture and retain up to 33,858,000 gallons of storm water runoff from all industrial areas. The design capacity is more than enough to capture a 100-year storm event (approximately 3.5 inches of rain in 24

hours). All storm water captured within the facility is discharged to the San Diego Metropolitan Sanitary Sewer System pursuant to an Industrial User Discharge Permit from the City of San Diego. Any storm water exceeding the capacity of the storm water diversion system would be discharged to San Diego Bay and would be required to comply with numeric effluent limitations for chronic toxicity and other discharge specifications in the Tentative Order.

Floating dry dock ballast water, floating dry dock flood water, graving dock flood water, fire protection water, potable water, and steam condensate are managed through BMPs which must be implemented in accordance with the requirements of the Tentative Order.

The Tentative Order was noticed and released for formal public review and comment on October 10, 2016. No comments were received on the Tentative Order.

LEGAL CONCERNS: None

SUPPORTING DOCUMENTS: 1. Tentative Order No. R9-2016-0116
2. Location Map

COMPLIANCE RECORD: According to NASSCO's self-monitoring reports, there were 19 noncompliance incidents during the term of the previous order, Order No. R9-2009-0099, between September 2009 and May 2016. These noncompliance incidents are generally classified as follows:

- 1 effluent limitation violation for zinc in hydrostatic relief water;
- 6 monitoring and/or reporting violations;
- 9 small releases of unauthorized materials, such as paint chips, abrasive dust, sewage, and other miscellaneous substances; and
- 3 large unauthorized releases of salt water, potable water, and untreated hydrostatic relief water.

Staff enforcement letters were sent to NASSCO requiring that steps be taken to prevent the reoccurrence of such violations. A mandatory minimum penalty in the amount of \$3,000 was imposed for the effluent limitation violation.

PUBLIC NOTICE: The Tentative Order was noticed and released for formal public review and comment on October 10, 2016. A public notice was published in the San Diego Union Tribune on

October 10, 2016. Notice was also provided in the Meeting Notice and Agenda for the December 14, 2016 Board meeting, which is posted on the San Diego Water Board's website. The release for public review and comment also included an email sent to all known interested parties and posting on the San Diego Water Board's website.