

# California Regional Water Quality Control Board San Diego Region



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April 16, 2007

In reply refer to:  
NCRU:01-0786:ccheng

Mr. Andrew Entingh, Head  
Environmental Compliance Department  
AC/S Environmental Security  
U.S. Marine Corps Base  
P.O. Box 555008  
Camp Pendleton, CA 92055-5008

**CERTIFIED MAIL**  
**Registration Number**  
7006 3450 0003 7392 6841

Dear Mr. Entingh:

## **INVESTIGATIVE ORDER NO. R9-2007-0065, DISCHARGE OF UNTREATED SEWAGE INTO SANTA MARGARITA RIVER, CAMP PENDLETON, SAN DIEGO**

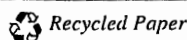
Enclosed is Investigative Order No. R9-2007-0065 (Order) of the California Regional Water Quality Control Board, San Diego Region (Regional Board) concerning the discharge of approximately 250,000 gallons of untreated sewage into the Santa Margarita River. The Order is issued pursuant to California Water Code (CWC) sections 13267 and directs the U.S. Marine Corps Base Camp Pendleton to submit a technical report **by May 7, 2007** that provides information about the sanitary sewage discharge, and water quality monitoring reports to assess its impact to the Santa Margarita River.

Please review the requirements contained within the Order and note that all technical reports submitted to the Regional Board must be accompanied by the certification, under penalty of law, that the information is true, accurate, and complete.

Please note that any discharge of the water to the Santa Margarita River from the catchment sump containing untreated sewage is a violation of State Board Order No. 2006-0003-DWQ, Regional Board Order No. R7-2007-0005, and prohibitions contained in the Water Quality Control Plan San Diego Basin. The U.S. Marine Corps Base Camp Pendleton shall take immediate steps to cease the discharge until water quality monitoring data demonstrate that the water in the catchment sump no longer contains residual pollutants from sewage that would cause adverse impact to the receiving water quality.

Failure to meet the requirements may subject you to further enforcement action by the Regional Board, including issuance of a cease and desist order, time schedule order, or

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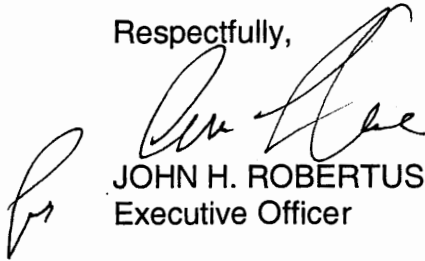


April 16, 2007

cleanup and abatement order; referral to the State Attorney General for injunctive relief; or referral to the District Attorney for criminal prosecution.

The heading portion of this letter includes a Regional Board code number noted after "In reply refer to:" In order to assist us in the processing of your correspondence please include this code number in the heading or subject line portion of all correspondence and reports to the Regional Board pertaining to this matter.

Respectfully,

  
JOHN H. ROBERTUS  
Executive Officer

JHR:mpm:rwm:cqc

Enclosure

cc: John Richards, Staff Counsel, Office of Chief Counsel (OCC), State Water Resources Control Board, 1001 "I" Street, 22nd Floor, Sacramento, CA 95814

Ms. Kathi Moore, Manager, Clean Water Act Compliance Office (WTR-7), Water Division, 75 Hawthorne Street, San Francisco, CA 94105

Mark Alpert, Senior EG, Compliance Assurance Unit, San Diego Water Board

Mr. Benjamin Frater, U.S. Fish and Wildlife Service, 6010 Hidden Valley Road Carlsbad, CA 92009

Mr. Brian Bernados, District Engineer, Department of Health Services, Southern California Drinking Water Field Operations Branch, 1350 Front Street, Room 2050, San Diego, CA 92101


Chuck Raysbrook, Regional Manager, California Dept. of Fish and Game, South Coast Region, 4949 Viewridge Drive, San Diego, CA 92123

Mr. Clay Clifton, Land and Water Division, Department of Environmental Health, 5210 Ruffin Road, Suite C, San Diego, CA 92123

CIWQS Code:

Reg ID: 213968, party ID: 48506, place ID: 256444, Person ID: 99782  
Investigative Order ID: 324690

California Environmental Protection Agency

 Recycled Paper

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN DIEGO REGION**

**INVESTIGATIVE ORDER NO. R9-2007-0065  
FOR  
VIOLATION OF STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS  
ORDER NO. 2006-0003-DWQ  
DISCHARGE OF UNTREATED SEWAGE AT BUILDING 2378  
MARINE CORPS BASE CAMP PENDLETON  
SAN DIEGO COUNTY**

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

1. MCB Camp Pendleton (hereinafter the Discharger) owns and operates the sewage collection system at Camp Pendleton, California. The Discharger's sanitary sewer system is regulated by State Board WDRs Order No. 2006-0003-DWQ, *Statewide General Waste Discharge Requirements for Sanitary Sewer Systems*. Order No. 2006-0003-DWQ prohibits the discharge of untreated or partially treated wastewater to waters of the United States, or that creates a nuisance as defined in California Water Code Section 13050 (m).
2. On or before November 15, 2006 and continuing through March 27, 2007, approximately 250,000 gallons of untreated sewage from a sewer lateral at Building 2378 at MCB Camp Pendleton was discharged into a drainage system from where the sewage was subsequently pumped into the Santa Margarita River in violation of Order No. 2006-0003-DWQ.
3. Pursuant to California Water Code Sections 13267, this Regional Board may investigate the quality of waters of the state by requiring dischargers to submit technical or monitoring reports.
4. Due to the Discharger's violation of Order No. 2006-0003-DWQ, submittal of technical information is necessary to determine the nature, circumstances, extent and gravity of the illicit discharge of sewage to the Santa Margarita River.
5. The costs associated with providing the information, including sampling, analysis and reporting, are estimated to be no more than \$100,000, which is reasonable for assessing the circumstances of an illicit discharge of sewage of the magnitude of this incident to waters of the U.S.
6. This action is for information gathering purposes and, as such, is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 2100 Et seq.) in accordance with Section 15306, Chapter 3, Title 14, California Administration Code.

IT IS HEREBY ORDERED, that pursuant to section 13267 of the California Water Code, the Discharger shall conduct a technical investigation, and prepare and submit the following technical report and water quality monitoring reports to the Regional Board:

**I. Technical Report**

The technical report shall contain, but is not limited to, the following information, and shall be submitted **no later than May 7, 2007**.

Cause and Circumstances of the Discharge

1. The date that the discharge from the sewer lateral at Building 2378 was discovered.
2. A detailed chronological description of all actions taken by the Discharger to terminate the discharge, repair the illicit connection, and mitigate its impacts. Please include an evaluation of the results of these actions.
3. A detailed report of the total volume discharged, including the assumptions and methods used in making the determination.
4. The total volume of water pumped into the Santa Margarita River from November 15, 2006 through March 27, 2007.
5. The monthly volume pumped into the Santa Margarita River for each month from March 2006 through March 2007.

Pollution Prevention Measures

6. Identification of the design and construction standards and specifications that were applied for the installation of the sewer lateral at Building 2378.
  7. Identification of the procedures and standards for inspecting and testing the installation of the sewer lateral at Building 2378.
  8. Copies of the following documents and the dates they were last updated, as appropriate: Pollution Prevention Plan, Sanitary Sewer Overflow Prevention Plan, Preventive Maintenance Plan, and Overflow Emergency Response Plan, prepared in accordance with Order No. 96-04 and Order No. 2006-003-DWQ.
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Nature and Impact of the Discharge

9. Any water quality monitoring data for the following areas: in the stormwater catchment sump near the pump house (Building 22022), in the impoundment located behind the pump house and in receiving water both upstream and downstream from where the discharged water merges with the Santa Margarita River.
10. An assessment of the impacts on fish, other species, and the overall ecosystem in the Santa Margarita River, and any short and long term effects resulting from the discharge including, but not limited to, impacts on public health and the environment. Please provide supporting rationale for any conclusions, discuss what steps were taken, or will be taken, to mitigate these impacts.
11. Any other pertinent information that will assist in evaluation of the nature, circumstances, extent and gravity of the discharges.

**II. Water Quality Monitoring Reports**

1. The Discharger shall monitor water quality and submit reports in accordance with the requirements specified in Table 1 below.

Table 1. Water Quality Monitoring Specifications

Monitoring Location	Monitoring Parameter	Sampling Schedule	Reporting Schedule
Catchment Sump near Pump House 22022	BOD <sup>1</sup> , TSS <sup>1</sup> , TDS, Oil & Grease, Turbidity <sup>1</sup> , pH, Total Coliform, Total Nitrogen, Total Phosphorus.	Monthly for a one-year period from April 2007 to March 2008	Reports shall be submitted by the 30 <sup>th</sup> day of the month following the month of sampling.
	Acute Toxicity <sup>1</sup> , Chronic Toxicity <sup>1</sup> .	Quarterly during the months of: April July October January	May 30 August 30 November 30 February 29

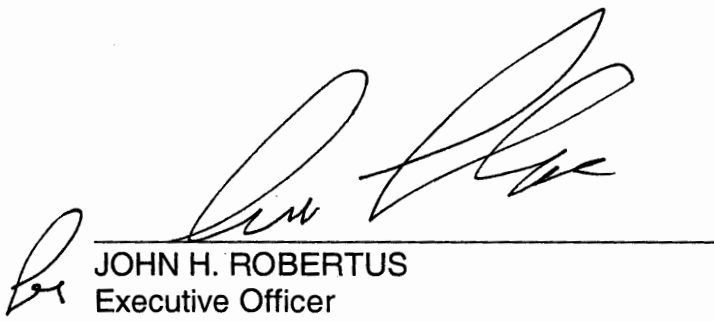
¼ mile upstream & ¼ mile downstream from where the discharged water merges with the Santa Margarita River	TDS, Chloride, Sulfate, Total Nitrogen, Total Phosphorus, Iron, Boron, DO, pH, Manganese, MBAS, Turbidity, Fluoride.	Quarterly during the months of: April July October January	May 30 August 30 November 30 February 29
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1. 24-hour composite samples. Unless noted, all others are grab samples.
2. Samples and measurements taken as required herein shall be representative of the nature of the monitored water. All samples shall be taken at the monitoring points specified in this Order.
3. Monitoring must be conducted according to United States Environmental Protection Agency test procedures approved under Title 40, Code of Federal Regulations (CFR), Part 136, "Guidelines Establishing Test Procedures for Analysis of Pollutants Under the Clean Water Act" as amended, unless other test procedures have been specified in this Order.
4. All analyses shall be performed in a laboratory certified to perform such analyses by the California Department of Health Services or a laboratory approved by the Regional Board.
5. If the discharger monitors any pollutants more frequently than required by this Order, using test procedures approved under 40 CFR, Part 136, or as specified in this Order, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the discharger's monitoring report. The increased frequency of monitoring shall also be reported.
6. Records of monitoring information shall include:
  - (a) The date, exact place, and time of sampling or measurements;
  - (b) The individual(s) who performed the sampling or measurements;
  - (c) The date(s) analyses were performed;
  - (d) The individual(s) who performed the analyses;
  - (e) The analytical techniques or method used; and
  - (f) The results of such analyses.

7. All monitoring instruments and devices which are used by the discharger to fulfill the prescribed monitoring program shall be properly maintained and calibrated as necessary to ensure their continued accuracy.
8. The monitoring reports shall be signed by an authorized person.

All information provided to the Regional Board shall include the following signed 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.*

  
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JOHN H. ROBERTUS  
Executive Officer

4/16/07  
Date

JHR:mpm:rwm:cqc