

**SAN DIEGO REGIONAL BOARD RESPONSES TO COMMENTS
 SUPPLEMENTAL RESPONSES PROVIDED AT THE REGIONAL BOARD MEETING
 TENTATIVE TO ORDER NO. R9-2009-0081
 NAVAL BASE CORONADO**

Item No. 08 Doc. No. 10

A. Comments submitted by Brian S. Gordon, Water Program Manager, Department of the Navy, on May 27, 2009:

Comments	Regional Board Response
<p>9. Current Language in Tentative Permit (Attachment E, Section V.B., p.E-15): The Discharger shall conduct 96-hour static renewal toxicity tests with the following vertebrate species:</p> <ul style="list-style-type: none"> • The topsmelt, <i>Atherinops affinis</i> [[Larval Survival and Growth Test Method 1006.0 {Daily observations for mortality make it possible to calculate acute toxicity for desired exposure periods (i.e., 96-hour Pass-Fail test)} in the first edition of Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to West Coast Marine and Estuarine Organisms (EPA/600/R-95/136, 1995) (specific to Pacific Coast waters); <p>Navy Comment: Because test species are commonly unavailable for use and there are so few qualifying storms, the Navy recommends adding the following:</p> <ul style="list-style-type: none"> • The Inland silverside, <i>Menidia beryllina</i>, only if <i>Atherinops affinis</i> is not available. <p>If the tentative permit continues to require the use of "most sensitive species" (Section V.A., P E-14 described above), then the language in this section must be changed to accommodate a potential change in test species.</p>	<p>Regional Board staff agrees. The Order will be changed.</p> <p>EPA requested that we remove this species from testing during comments to the Continental Order because it is an east coast species. However, we have an alternate invertebrate species in case the west coast species is unattainable. It follows to allow an alternate fish species as well in case the west coast species is unattainable. The Inland silverside, <i>Menidia beryllina</i> is listed in the Ocean Plan as an acceptable species if the topsmelt is unavailable.</p>
<p>15. Monitoring and Reporting Program (MRP) The MRP requirements for discharges at NBC can be reduced and still be effective in evaluating compliance, and protecting water quality and beneficial uses. Reducing monitoring and reporting will conserve resources (staff time and funding) and allow more resources to be directed towards implementing programs to improve water quality, such as testing and implementation of additional BMPs. The Navy requests the following changes be included in the MRP.</p> <p><u>Steam Condensate</u></p>	<p><u>Steam Condensate and Diesel Engine Cooling Water</u> - Monthly monitoring is appropriate as required in the Order to evaluate compliance with effluent limitations.</p> <p><u>Receiving Water Monitoring</u> - The purpose of the receiving water temperature monitoring is to evaluate the impacts of the thermal discharge on the bay and to evaluate compliance with the</p>

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- Reduce the sampling frequency for flow from 1/month to 1/quarter. The volume of steam condensate discharged to San Diego Bay at each discharge location is extremely small and is dispersed over a large area. The total discharge volume per day based on 33 discharge points is estimated at 100 to 350 gallons or on average approximately 11 gallons for each discharge location. The process generating this discharge has not changed in several years so quarterly monitoring is more than adequate to determine the flow volume. Request Table E-2 be revised to require 1/quarter sampling.
- Change the sampling frequency for Bis (2-ethylhexyl) Phthalate, Copper and Lead from 1/month to 1/quarter. The process generating this discharge is very consistent and the discharge volume is extremely low. The Navy has adequately characterized this discharge and provided analytical data on the priority pollutants and a list of boiler chemicals used in the steam generating process. The permit already includes a provision for the Navy to report all process changes that could affect the character of the discharge. The boiler chemicals do not contain the pollutants listed above and the only sources of these pollutants would be from potable water delivered to the installation, or the boiler or distribution piping system. Changing the sampling frequency from 1/month to 1/quarter will provide sufficient data for the Navy and Regional Water Board staff to evaluate compliance, pollutant loading to the bay, and determine if BMPs are effective. Request Table E-2 be revised to require 1/quarter sampling.
- Change the sampling frequency for TCDD Equivalents from 1/month to 1/quarter. The process generating this discharge is very consistent and is not expected to produce these pollutants. Changing the sampling frequency from 1/month to 1/quarter will provide sufficient data for the Navy and Regional Water Board staff to evaluate compliance, pollutant loading to the bay, and determine if BMPs are effective. Request Table E-2 be revised to require 1/quarter sampling.

Diesel Engine Cooling Water - The monthly monitoring requirements for diesel

effluent limitations. Quarterly temperature effluent monitoring is required so quarterly receiving water monitoring is appropriate. The Monitoring and Reporting Program will be changed.

Self Monitoring Reports - Because the Navy is required to report violations within 24 hours, quarterly reports can be acceptable for reporting both quarterly and monthly monitoring data. The Monitoring and Reporting Program will be modified.

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<p>engine cooling water should be reduced to quarterly monitoring. The Navy has adequately characterized this discharge and provided analytical data on the priority pollutants. Changing the sampling frequency from 1/month to 1/quarter will provide sufficient data for the Navy and Regional Water Board staff to evaluate compliance, pollutant loading to the bay, and determine if BMPs are effective. Request Table E-3 be revised to require 1/quarter sampling for the following parameters - Total Suspended Solids, arsenic, cadmium, chromium, copper, DDT, lead, mercury, nickel, TCDD-equivalents, zinc, and salinity.</p> <p><u>Receiving Water Monitoring</u> - The monthly monitoring requirement for temperature is presumably required to evaluate impacts of thermal discharges to the bay. Since monitoring of thermal discharges for temperature at NBC is required quarterly the Navy requests the receiving water temperature monitoring in Table E12 be changed to 1/quarter to coincide with discharge effluent monitoring.</p> <p><u>Self Monitoring Reports</u> - The MRP requires the monthly submittal of self monitoring reports. Reducing this reporting frequency from monthly to quarterly will conserve resources (staff time and funding) and allow more resources to be directed towards implementing programs to improve water quality, such as testing and implementation of additional BMPs, rather than on report writing. This will also reduce the work load for Regional Water Board staff by reducing the number of reports requiring review. Quarterly self monitoring reports will provide the identical data as submitted in monthly reports for use in evaluating compliance and potential impacts to beneficial uses. Because the order already includes a "Standard Provision" (page 30) requiring the Navy to notify the Regional Water Board within 24 hours of violating any condition of the order, including effluent limitations, the change from monthly to quarterly will not affect prompt notification for any violations of the order.</p>	
<p>16. TCDD Equivalents The SIP on pages 28 and 29, Enclosure (9), only requires 2,3,7,8-</p>	<p>TCDD equivalents are appropriate for the discharges to the Ocean because the Ocean</p>

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tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD) be evaluated to determine if Water Quality Based Effluent Limitations (WQBELs) are required and not other TCDD congeners. The SIP requires monitoring for other TCDD congeners with the stated purpose of assessing the presence and amounts of congeners discharged so that future multi-media control strategies can be developed. In addition, WQBELs were inappropriately established for all TCDD equivalents using the California Toxics Rule (CTR) criteria established for 2,3,7,8-TCDD. Table F-6 on page F-43 of the fact sheet incorrectly lists the 2,3,7,8-TCDD CTR criteria as the criteria for all TCDD equivalents. This resulted in a final WQBEL that is overly conservative for TCDD equivalents and not based on the actual toxicity of the pollutant. Other factors that argue against effluent limits for TCDD equivalents include laboratory uncertainty at the very low detection limits required by the permit and the possibility that sources of the congeners may not be under the direct control of the discharger (i.e. atmospheric deposition, intake water). For these reasons we request the reasonable potential analysis (RPA) and WQBEL (if required) be limited to 2,3,7,8-TCDD. The effluent limitation for TCDD equivalents should be deleted from the order. The Navy also request that the RPA be reaccomplished and the Summary of RPA Results (Table F-8) and any other applicable sections of the order be updated.

Plan Table B specifies an objective for TCDD equivalents. TCDD equivalents are appropriate for San Diego Bay due to a discussion in the preamble of the CTR. The CTR only lists a criteria for 2,3,7,8-TCDD (dioxin), not TCDD equivalents, but the CTR preamble (65 FR 31695) states "For California waters, if the discharge of dioxin or dioxin-like compounds has reasonable potential to cause or contribute to a violation of a narrative criterion, numeric water quality-based effluent limits for dioxin or dioxin-like compounds should be included in NPDES permits and should be expressed using a TEQ scheme." TEQ stands for toxic equivalency quantity, and it means the sum of the toxicity of all of the detected TCDD congeners in a sample. TEQ is the same as TCDD equivalents. The RPA showed a reasonable potential for dioxin or dioxin-like compounds to cause or contribute to an excursion above a water quality standard. The Order uses a TEQ scheme resulting in an effluent limit expressed as TCDD equivalents.

The Order will not be changed.