

Alex:

The following are comments from Camp Pendleton on Tentative Order No. R9-2014-006:

1) Tentative Monitoring and Reporting Section - Currently labeled as Attachment C, although it appears to have its own numbering. Consider revising and labeling as Attachment D. In the monitoring Section, the Flow rate, BOD, TSS, and pH monitoring location should all be moved to the end of the media filters since discharge to the percolation ponds do not go through the chlorine contact basin.

2) Camp Pendleton requests permit rewording to reflect authority under CWA and SDWA and include/modify language that changes several sections to comply with laws and regulations which the United States Congress has provided a waiver of sovereign immunity. Request inclusion of these changes to assure permit is fully within jurisdiction of the Clean Water Act and/or Safe Drinking Water Act:

(1) Reclaim Permit:

- Page 3, II.C: the words "to the extent permitted by federal law" should be included at the end of the last sentence.
- Page 4, III.A: the words "to the extent permitted by federal law" should be included at the end of the last sentence.
- Page 5, III.C: recommend changing "waters of the State" to "waters of the United States" OR including the words "to the extent permitted by federal law" at the end of the last sentence.
- Page 5, III.D: the words "to the extent permitted by federal law" should be included at the end of the last sentence.
- Page 9, ~~VIIV~~.A.1: the words "to the extent permitted by federal law" should be included at the end of the last sentence.
- Page 10, ~~VIIV~~.B (main paragraph): the words "to the extent permitted by federal law" should be included at the end of the second sentence.
- Page 11, ~~VIIV~~.D: the words "to the extent permitted by federal law" should be included at the end of the last sentence.
- Page 11, ~~VIIV~~.E: "waters of the State" should be replaced with "waters of the United States"
- Page 12, ~~VIIV~~.J: the words "to the extent permitted by federal law" should be included at the end of the first sentence; the words "applicable to federal facilities in accordance with federal law" should be added to the end of the last sentence.

(2) Tentative Monitoring and reporting Program:

- Page 3, I.K: the words "to the extent permitted by federal law" should be included at the end of the second sentence.
- Page 4, I.L: recommend changing "waters of the State" to "waters of the United States" OR including the words "to the extent permitted by federal law" at the end of the last sentence.

3) Discharge Specifications IV.C. lists the average annual effluent flow to the percolation ponds shall not exceed 2.4 mgd. Special Provision VII.D. requires submittal of a certification report showing that the treatment and disposal facilities have adequate capacity for the full design flow for secondary and tertiary treatment. The NRTTP design flow is 4.0 mgd (annual average daily flow). Current permitted perc pond capacity is 2.38 mgd. Camp Pendleton recently completed a percolation basin capacity study

of the ponds and the results indicate that the ponds are capable of receiving the full design flow of 4.0 mgd.

4) Table 5, Discharge Specifications, shows 45 mg/L for Total Nitrogen. Should this be 4.5 mg/L, or possibly this represents a Nitrate specification?

5) Attachment B, I.F&G are redundant with Special Provisions VII.D.5&6. Monitoring and Reporting Program I.L is redundant with permit Provisions VI.D.

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