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**Cc:** [Golumbfskie, Jason C CIV NAVFAC SW, UEM](#); [Palmer, Jessica N CIV NAVFAC SW](#); [Anson, Ryan CIV NAVFAC SW, ESWD](#); [Beverly, Kathie J CIV NAVFAC SW](#); [CROW, JOHN L CIV NAVFAC SW, EV](#); [Waldman, Jeff L CIV NAVFAC, SW](#); [Vaughn, Sheryl D CIV NAVFAC SW, EV11](#); [Locke, John B CIV NAVFAC SW](#); [Salle, Laura E CIV NAVFAC SW](#); [Araracap, Rose M CIV NAVFAC SW](#)  
**Subject:** Navy Comments on Tentative Order R9-2015-0117 (Tentative NBC NPDES Permit)  
**Date:** Friday, October 09, 2015 3:20:02 PM  
**Attachments:** [Comments on Tentative NBC Permit Oct 2015 Final.docx](#)  
[NAB Outfall Assessment.docx](#)  
[NASNI Outfall Assessment.docx](#)

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Kristin:

Please find attached the Navy's comments on the above-listed tentative order. The only major item are classification of outfalls and we should discuss with the NBC environmental media folks.

If you have any questions, please call or email me.

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v/r Len Sinfield P.G.  
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**Comments on Tentative Order R9-2015-0117 (Tentative NBC Permit)**

NO.	DOCUMENT LOCATION			PERMIT TEXT	COMMENT
	PAGE/FIG.	SECT./ TABLE/ ATTACHMENT	PARA./ BULLET		
1	1	Table 1	--	Facility Contact at Adoption: Andrew Baughman	New Installation Environmental Program Director is Mr. Jason Golumbfskie
	F-3	Table F-1	--	Facility Contact and Authorized Person to Sign Reports	
2	28	VI.A.2.b	b	This Order expires on <b>January 31, 2021</b> , after which, the terms and conditions of this permit are automatically continued pending issuance of a new Order, provided that all requirements of USEPA's NPDES regulations at 40 CFR section 122.6 and the state's regulations at CCR title 23, section 2235.4 regarding the continuation of expired Orders and waste discharge requirements are met.	Table 3 on page 3 indicates that the expiration date of the permit is December 31, 2020.
3	34	VII.J	2 <sup>nd</sup>	The Maximum Daily Effluent Limitation (MDEL) for chronic toxicity is exceeded and a violation will be flagged when a chronic toxicity test, analyzed using the TST statistical approach, results in "Fail" and the "Percent Effect" is <b>≥0.50</b> .	The value of the "Percent Effect" should be revised from 0.5 to 50 – the proportion is listed rather than the percent value: The Maximum Daily Effluent Limitation (MDEL) for chronic toxicity is exceeded and a violation will be flagged when a chronic toxicity test, analyzed using the TST statistical approach, results in "Fail" and the "Percent Effect" <b>is ≥50</b> .

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4	34	VII.J	3 <sup>rd</sup>	The Median Monthly Effluent Limitation (MMEL) for chronic toxicity is exceeded and a violation will be flagged when the median of no more than three independent chronic toxicity tests, conducted within the same calendar month and analyzed using the TST statistical approach, results in "Fail". The MMEL....	The text should be revised as follows for clarity: Median Monthly Effluent Limitation (MMEL) for chronic toxicity is exceeded and a violation will be flagged when the median of no more than three independent chronic toxicity tests, conducted within the same calendar month and analyzed using the TST statistical approach, results in "Fail" with a percent effect of $\geq 50$ at the IWC. The MMEL...
5	35	VII.J	2 <sup>nd</sup>	The chronic toxicity MDEL and MMEL are set at the IWC for the discharge (100% effluent) and expressed in units of the TST statistical approach ("Pass" or "Fail", "Percent Effect"). All NPDES effluent compliance monitoring for the chronic toxicity MDEL and MMEL shall be reported using the 100% effluent concentration and negative control, expressed in units of the TST. The TST hypothesis (Ho)....	The text should be revised as follows for clarity: The chronic toxicity MDEL and MMEL are set at the IWC for the discharge (100% effluent) and expressed in units of the TST statistical approach ("Pass" or "Fail," "Percent Effect"). All NPDES effluent compliance monitoring for the chronic toxicity MDEL and MMEL shall be reported using the 100% effluent concentration and negative control, expressed in units of using the TST outcome and percent effect. The TST hypothesis (Ho)....

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6	E-12	Attachment E.IV.2	2 <sup>nd</sup>	For discharges to marine and estuarine waters, the Discharger shall conduct a static renewal toxicity test with the topsmelt, <i>Atherinops affinis</i> (Larval Survival and Growth Test Method 1006.01); a static non-renewal toxicity test with the giant kelp, <i>Macrocystis pyrifera</i> (Germination and Growth Test Method 1009.0); and a static non-renewal toxicity test with the purple sea urchin, <i>Strongylocentrotus purpuratus</i> , or the sand dollar, <i>Dendraster excentricus</i> (Fertilization Test Method 1008.0).	We recommend that the method for assessing the purple sea urchin be changed from the “Fertilization Test Method” to the “Embryolarval Development Test Method” as required in the NBSD NPDES Permit (R9-2013-0064). The Embryo-larval Development Test is recommended over the egg fertilization endpoint method because this procedure includes a longer exposure period and thus more cellular changes and processes than fertilization alone. The outcome of the embryo development test is also less dependent on seasonal variations in sperm motility and technician-specific techniques.
7	E-13	Attachment E.IV.3.	1 <sup>st</sup>	The MDEL for chronic toxicity is exceeded and a violation will be flagged when a toxicity test during monitoring results in a “fail” in accordance with the TST approach and the percent effect is greater than or equal to 0.50.	The text should be revised as follows for clarity: The MDEL for chronic toxicity is exceeded and a violation will be flagged when a toxicity test during monitoring results in a “Fail” in accordance with the TST approach and the percent effect relative to a control is $\geq 50$ .  Note: the percent effect should be 50%, not 0.50%.
8	E-18 and E-19	Attachment E.V And Table E-5	--	Pollutants and Frequency: The Sampling and Analysis Plan shall propose the pollutants to be monitored, and the frequency and timing for water column sampling. At a minimum, monitoring shall include the pollutants and frequency in Table E-5 below. The proposed sampling shall be based upon results on the fate and transport of pollutants from the conceptual model (see V.C.5 below).	The text should be revised as follows for clarity: Pollutants and Frequency: “ <i>The Sampling and Analysis Plan shall propose the pollutants to be monitored, and the frequency and timing for water column sampling to be performed in San Diego Bay. At a minimum, monitoring shall include the pollutants and frequency in Table E-5 below. The proposed sampling shall be based upon results on the fate and transport of pollutants from the conceptual model (see V.C.5 below).</i> ”

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9	E-25	Table E-6 Attachment E	Footnote 6	After four consecutive sample events where parameters are not detected or below the Annual NAL values, analysis for those parameters may be discontinued.	The text should be revised as follows for clarity: After four consecutive sampling events where parameters are not detected or are below the Annual NAL values, analysis for those parameters may be discontinued <b>at any affected outfall.</b>
	E-27	Table E-7 Attachment E	Footnote 8		
10	F-8 and F-9	Attachment F.6 through F.8	--	<p>“Storm water discharges from the RTSWS are considered to be non-industrial Small Military Base MS4 discharges.”</p> <p>“La Posta MWTC is a remote facility has only non-industrial Small Military Base MS4 storm water or point source discharges.”</p> <p>“Storm water discharges from Camp Morena are considered to be non-industrial Small Military Base MS4 discharges.”</p>	<p>Remote Training Site Warner Springs, La Posta MWTC, and Camp Morena are small, remote training facilities. According to 2010 Census Maps, all are located over 10 miles away from the nearest urbanized area. Phase II MS4 rule requirements are intended to regulate discharges of storm water in urbanized areas.</p> <p>Please revise the permit to clarify that Naval Base Coronado is not required to implement Small MS4 requirements in training areas and other areas outside of urbanized areas.</p>
11	G-1	Section I Attachment G	2 <sup>nd</sup> sentence	Following full compliance with section IV.E.2 of the Order, the Discharger may phase out coverage of areas designated as “Small MS4 Area”, as defined in section IV.E.2 of the Order that are adequately addressed under the Storm Water Management Program (SWMP).	<p>The reference Section IV.E.2 appears to be incorrect in that it applies industrial SWPPP requirements.</p> <p>Section IV.D.2 applies to Small MS4 Discharge Specifications.</p> <p>We need to discuss and obtain clarification from the Board.</p>

**Comments on Tentative Order R9-2015-0117 (Tentative NBC Permit)**

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12		Table M-1 Attachment M	--		Currently reviewing and additional comments may be pending.
<b>Typographical Issues</b>					
13	7	III.I	5 <sup>th</sup>	Discharges to Waters of the U.S., including but not limited to San Diego Bay, the Pacific Ocean, and the Tijuana River Estuary, containing a hazardous substance equal to or in excess of a reportable quantity listed in 40 CFR part 117, <i>Security Classification Regulations Pursuant To Executive Order 11652</i> , and/or <b>CFR part 302</b> , <i>Designation, Reportable Quantities, and Notification</i> , are prohibited	The highlighted reference should be <b>40</b> CFR part 302
	30	Section VI.C.2.a	--	“The Discharger may, at their discretion, propose a work plan for a detailed study to support a Basin <b>Pan</b> Amendment...”	Revise to Basin <b>Plan</b> .
	F-11	Section II.B.1.b Attachment F	--	This Order establishes requirements for the discharge of storm water runoff from “Industrial High Risk Areas,” which are defined in section IV.B.1 of this Order as “ <i>All areas where wastes or pollutants of significant quantities <b>form</b> ship construction</i> ”	“...form” should be “from”
	M-3 and M-4	Listing of NBC Industrial Storm Water Discharge Locations Attachment M	--	“NANSI”	Please revise Navy ID Numbers written as “NANSI” to “NASNI”

NAB

Outfall	Current Permit		New Permit			Old Permit	Notes	Action
	Sampled	Observed	Municipal	Industrial Low-Risk	Industrial High-Risk			
1			1			Non-Ind	Misc. supply storage	Concur w/ Permit
2	1	1	1			Industrial	Some exposed Zodiac & outboard engine repair (B/145)	Discuss / May be Ind-Low-Risk
3		1		1		Industrial	Boat repair and storage	recommend Municipal for this basin.
4	1	1		1		Industrial	Boat repair and storage	Concur w/ Permit
5			1			Non-Ind	Roof drain only	Concur w/ Permit
6	1	1			1	Industrial	Outdoor boat repair and maintenance.	Concur w/ Permit
7			1			Non-Ind	Seal Team office and storage building (B/215).	Concur w/ Permit
8	1	1	1			Industrial	Some exposed Zodiac & outboard engine repair (B/317)	Discuss / Possibly Ind-NE if not Ind-Low-Risk
9	1	1			1	Industrial	Abrasive blasting, outdoor barge maint (B/332 & B/350).	Concur w/ Permit
10		1			1	Industrial	Outdoor barge maint (B/332).	Concur w/ Permit
11	1	1			1	Industrial	Outdoor barge maint (B/332).	Concur w/ Permit
12			1			Non-Ind	Office building.	Concur w/ Permit
13			1			Non-Ind	Nothing	Concur w/ Permit
14			1			Non-Ind	MWR loading dock and parking.	Concur w/ Permit
15			1			Non-Ind	BOQ	Concur w/ Permit
16		1	1			Industrial	Solid material recycling collection and processing	Outfalls 16 and 17 both discharge runoff from the SMRC. Make Ind-Low-Risk, as Outfall 17.
17	1	1		1		Industrial	Solid material recycling collection and processing	Concur w/ Permit
18		1	1			Industrial	Warehouse for misc. supplies.	Concur w/ Permit
22			1			Non-Ind	Gas station, vehicle repair and washing.	Concur w/ Permit
23			1			Non-Ind	Covered hazmat storage. To Gabion.	Concur w/ Permit
24			1			Non-Ind	Covered hazmat storage. To Gabion.	Concur w/ Permit
25			1			Non-Ind	Covered hazmat storage. To Gabion.	Concur w/ Permit
26			1			Non-Ind	Office building. (Not Ind) To Gabion	Concur w/ Permit
27			1			Non-Ind	Office building. (Not Ind) To Gabion	Concur w/ Permit
28			1			Non-Ind	Office building. (Not Ind) To Gabion	Concur w/ Permit
29			1			Non-Ind	Parking lot and building. (Not ind) To Gabion.	Concur w/ Permit
30	1	1		1		Industrial	Outdoor boat maint and washing (B/17 & B/111).	Concur w/ Permit
31			1			Non-Ind	Berm for gym and/or misc. supply storage.	Concur w/ Permit
32		1		1		Industrial	Outdoor boat maint and washing (B/17).	Concur w/ Permit
33	1	1			1	Industrial	Outdoor boat maint (BMA-1).	Conditional High Risk
34		1			1	Industrial	Outdoor boat maint (BMA-2).	Concur w/ Permit
35			1			Non-Ind	Office building. (Not Ind) To Gabion	Concur w/ Permit
36			1			Non-Ind	Office building. (Not Ind) To Gabion	Concur w/ Permit
37			1			Non-Ind	Parking, roads, fleet vehicle storage. (Not Ind) To Gabion	Concur w/ Permit
38			1			Non-Ind	Office building. (Not Ind) To Gabion	Concur w/ Permit
39			1			Non-Ind	Office building. (Not Ind) To Gabion	Concur w/ Permit
40		1	1			Industrial	Hazmat storage in lockers and dive ops (B/211)	Concur w/ Permit
41	1	1	1			Industrial	Gas station	Concur w/ Permit
43			1			Non-Ind	Indoor range and outdoor breach training. (Not Ind)	Concur w/ Permit
50			1			Non-Ind	Parking lot	Concur w/ Permit
51			1			Non-Ind	Seal Team office and storage buildings (B/215).	Concur w/ Permit
52	1	1	1			Industrial	Some exposed Zodiac & outboard engine repair (B/216)	Discuss / Ind-Low-Risk
53	1	1	1			Industrial	Some exposed Zodiac & outboard engine repair (B/216), wash rack.	Discuss / Municipal
54		1	1			Industrial	Classroom building mostly.	Concur w/ Permit
55			1			Non-Ind	Residential	Concur w/ Permit
56			1			Non-Ind	Dive ops (B/211)	Concur w/ Permit
57			1			Non-Ind	Dive ops (B/211)	Concur w/ Permit





## NAB

**Small Municipal (Military Base) Separate Storm Sewer System (MS4) Areas** Areas where no industrial activities occur. Areas designated as "Small MS4 Areas" shall be subject to the technology-based standard of maximum extent practicable (MEP) and Storm Water Management Program (SWMP) requirements contained in section IV.D of this Order.

**Industrial No Exposure Areas** Areas where all industrial materials and activities are protected by a "storm-resistant shelter,"<sup>1</sup> to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials and activities include, but are not limited to, material handling<sup>2</sup> equipment or activities, industrial machinery, raw materials, intermediate products, by-products, finished products, or waste products.

**Industrial Low Risk Areas.** All areas where wastes or pollutants from industrial activities are subject to precipitation, run-on, and/or runoff and which are not classified as Industrial No Exposure Areas or Industrial High Risk Areas.

**Industrial High Risk Areas** All areas where wastes or pollutants of significant quantities from ship construction, modification, repair, and maintenance activities (including abrasive blast grit material, primer, paint, paint chips, solvents, oils, fuels, sludges, detergents, cleansers, hazardous substances, toxic pollutants, non-conventional pollutants, materials of petroleum origin, or other substances of water quality significance) are subject to precipitation, run-on, and/or runoff.

\* From NBSD Permit





## NASNI

Outfall	Current Permit		New Permit			Old Permit	Notes	Action
	Sampled	Observed	Municipal	Industrial Low-Risk	Industrial High-Risk			
40			1			Non-Ind	non industrial	Concur
CVN19			1			Non-Ind	non industrial	Concur
						Non-Ind		
<b>TOTALS</b>	<b>33</b>	<b>58</b>	<b>34</b>	<b>21</b>	<b>33</b>			

**Small Municipal (Military Base) Separate Storm Sewer System (MS4) Areas** | Areas where no industrial activities occur. Areas designated as "Small MS4 Areas" shall be subject to the technology-based standard of maximum extent practicable (MEP) and Storm Water management Program (SWMP) requirements contained in section IV.D of this Order.

**Industrial No Exposure Areas** | Areas where all industrial materials and activities are protected by a "storm-resistant shelter,"1 to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials and activities include, but are not limited to, material handling2 equipment or activities, industrial machinery, raw materials, intermediate products, by-products, finished products, or waste products.

**Industrial Low Risk Areas.** | All areas where wastes or pollutants from industrial activities are subject to precipitation, run-on, and/or runoff and which are not classified as Industrial No Exposure Areas or Industrial High Risk Areas.

**Industrial High Risk Areas** | All areas where wastes or pollutants of significant quantities from ship construction, modification, repair, and maintenance activities (including abrasive blast grit material, primer, paint, paint chips, solvents, oils, fuels, sludges, detergents, cleansers, hazardous substances, toxic pollutants, non-conventional pollutants, materials of petroleum origin, or other substances of water quality significance) are subject to precipitation, run-on, and/or runoff.