



DEPARTMENT OF DEFENSE
REGIONAL ENVIRONMENTAL COORDINATOR, REGION 9
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April 6, 2012

Ms. Jeanine Townsend
Clerk of the Board
State Water Resources Control Board (SWRCB)
1001 I Street, 24th Street
Sacramento, CA 95814

Subject: COMMENT LETTER - DESALINATION FACILITIES AND BRINE DISPOSAL

On behalf of Rear Admiral Smith, the Department of Defense (DOD) Regional Environmental Coordinator for EPA Region IX, and the Military Services in California, I respectfully submit these comments for the SWRCB's Scoping Meeting, California Ocean Plan Amendments, Desalination Facilities and Brine Disposal. We appreciate the opportunity to provide comments for consideration as you develop the subject Ocean Plan Amendments and California Environmental Quality Act documents.

DoD currently operates desalination facilities on properties in water short areas of California including remote islands. Developing alternative water supplies in these locations can have more environmental cost than the small impact of desalination facilities. We also continue to study the feasibility of additional desalination facilities to meet the water supply needs of our bases and training areas in California. These facilities are generally small, providing less than 50,000 gallons per day of potable water supply. Our analysis has shown that these small systems pose a very small risk to the environment either from their sea water intake systems or the discharge of concentrated brine. Additionally, training activities are conducted that include the set up and short term operation of tactical desalination systems. These training activities occur a few times per year with each event producing about 400 gallons of product and 800 gallons of brine. The small size and short term operation of these systems makes them very low risk to the environment.

DoD requests that the proposed amendments to the *Water Quality Control Plan for Ocean Waters of California* (Ocean Plan) and the *Water Quality Control Plan for Enclosed Bays and Estuaries of California* (Enclosed Bays and Estuaries Plan) include a thorough evaluation of the environmental cost and benefit of these small facilities. Further DoD requests the Plan Amendments and the California Environmental Quality Act (CEQA) compliance documents include an evaluation of reducing and/or eliminating requirements for these small, low-risk systems.

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We also ask that you consider, in your scoping efforts, how to best facilitate the possible combined discharge of brine from desalination facilities (ocean or brackish) with existing or new wastewater discharges that meet Title 22 Standards. Though demand and opportunity to utilize reclaimed water is increasing—particularly in Southern California—the use of reclaimed water is often infeasible during wetter portions of the year. Where reclaimed water cannot be beneficially reused or stored for future beneficial reuse, some DoD installations may need to utilize ocean outfalls to dispose of either tertiary or secondary treated effluent. Both combined discharges and separate brine only discharges can be accomplished through outfalls, in a manner that protects pertinent ocean uses, when properly designed with sufficient initial dilution. The manner of initial dilution, and how to best facilitate combined discharges of brine and highly treated domestic wastewater, should be considered when evaluating the Ocean Plan Amendments.

The DoD requests that you consider the comments in this letter for the upcoming revisions to the Ocean Plan. The points of contact for this letter are Mr. Chris Haynes; email christopher.a.haynes@navy.mil commercial (619)532-2285 and Mr. Michael Huber; email michael.huber@navy.mil commercial (619)532-2303.

Sincerely,



C. L. STATHOS
By direction