



UNITED STATES MARINE CORPS
MARINE CORPS INSTALLATIONS WEST-MARINE CORPS BASE
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5090
ENV/SWS
August 21, 2017

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



Dear Ms. Townsend:

SUBJECT: COMMENT LETTER - SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEM
PERMIT AMENDMENT

Marine Corps Installations West-Marine Corps Base, Camp Pendleton (MCIWEST-MCB CAMPEN) owns a Small Municipal Separate Storm Sewer System (Small MS4) and is permitted to operate it under the Small MS4 Permit Phase II regulations, due to its status as a military base. MCIWEST-MCB CAMPEN respectfully submits the enclosed review comments for the "Proposed Amendment to the General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4) (Implementing Region-Specific Total Maximum Daily Load Requirements)", issued on June 5, 2017.

Thank you for the opportunity to submit these comments, on behalf of MCIWEST-MCB CAMPEN. Should you have any questions, please feel free to contact me at (760) 725-9753 or mark.bonsavage@usmc.mil, or Mr. Stuart Eyler at (760) 725-9760 or stuart.eyler@usmc.mil.

Sincerely,

M. J. BONSAVAGE
Head, Env Engineering Branch
Environmental Security
By direction of the
Commanding General

Enclosure: MCIWEST-MCB CAMPEN Comments on the Proposed Amendment

MCIWEST-MCB CAMPEN COMMENTS ON THE PROPOSED AMENDMENT
TO THE GENERAL PERMIT FOR DISCHARGES FROM SMALL MUNICIPAL SEPARATE STORM
SEWER SYSTEMS (MS4), ISSUED ON JUNE 5, 2017

MCIWEST-MCB CAMPEN occupies a small area of the westernmost portion of the San Luis Rey (SLR) Watershed. This area is relatively undeveloped, with some sparse military cantonment and housing land use. Despite its sparse development, MCIWEST-MCB CAMPEN's land within the SLR Watershed has a large number (160) of small-sized stormwater drainage and conveyance systems that will be impacted by the proposed Amendment, which calls for monitoring MS4 discharge locations for bacteria within the SLR Watershed.

The recommended changes to the proposed Amendment are described below:

1. There is conflicting information in the Small MS4 Permit Amendment, between Attachment G and the Fact Sheet, with respect to Phase II permittee/discharger identification and compliance responsibilities. Page 125 of the Fact Sheet under "Phase II Entities" states "The Bacteria Project I TMDL identifies responsible dischargers contributing to indicator bacteria exceedances in REC-1 designated receiving waters for 20 listings of beaches and inland water bodies," and then lists the Non-Traditional MS4s. MCIWEST-MCB CAMPEN is not listed here, which would indicate that stated responsibilities and requirements (SWPPP, monitoring, etc.) do not apply to the Base. However, MCIWEST-MCB CAMPEN is listed in Attachment G, Bacteria Project I TMDL - Twenty Beaches and Creeks in the San Diego Region, as a Phase II Entity; meaning requirements for implementing the TMDL would apply to the Base. Please clarify what TMDL requirements would apply to MCIWEST-MCB CAMPEN.
2. Several of the proposed compliance deadlines contained on page 126 of the Fact Sheet are near term or have passed. If these deadlines apply to MCIWEST-MCB CAMPEN, there would be significantly more time needed to comply than has been proposed. Additionally, the Bacteria Project I TMDL (Attachment G, paragraph 2) specifies that monitoring and assessment results for discharges from MS4 locations must be submitted within 3 months of the adoption date, assumed to be December 2017. This is insufficient time for MCIWEST-MCB CAMPEN to complete dry and wet weather monitoring, if required of the Base. Dry weather monitoring would not occur until 2018. Therefore, MCIWEST-MCB CAMPEN requests at least one year (12 months) to complete monitoring and provide results.
3. MCIWEST-MCB CAMPEN recommends that only outfalls collecting stormwater from an area with an activity code known to contribute anthropogenic bacteria (i.e. confined animal pens), be subject to monitoring, as a more cost-effective use of funds. Therefore, MCIWEST-MCB CAMPEN proposes that the "Deliverables / Actions Required" on Attachment G, page 93, paragraph 2 of the proposed Amendment be changed.

from:

"...monitor discharges from facilities including MS4 discharge locations to demonstrate progress towards compliance with final waste load allocations"

to:

"...monitor discharges from facilities or discharge locations where the expected pollutant loading is greater than the average pollutant loading for the land use, to demonstrate progress towards compliance with final waste load allocations".

4. In addition, housing areas have multiple stormwater discharges, but the discharge characteristics are expected to be identical since the housing design and BMP maintenance programs are managed by the same private housing entity. Therefore, we recommend that the proposed Amendment (Attachment G, page 93, paragraph 3) be revised to allow for "representative monitoring" of discharge locations. (Representative monitoring is allowed under the EPA drinking water program; representative monitoring is the use of monitoring results of one water quality monitoring sample to represent other sampling locations with similar BMPs expected to have the same water quality.)

5. MCIWEST-MCB CAMPEN has significant areas of open space which contributes bacteria from natural sources (i.e. wildlife, soils, etc.). It is not clear in the Amendment Fact Sheet (Bacteria Project I TMDL) if natural sources are accounted for in the Wasteload Allocations. In addition, the SWRCB has recently proposed new bacteria provisions and a water quality standards variance policy, which include natural source exclusion provisions. MCIWEST-MCB CAMPEN needs to account for natural sources of bacteria in the levels monitored in stormwater discharges, to establish actual bacteria loadings contributed by MCIWEST-MCB CAMPEN's use of the land. MCIWEST-MCB CAMPEN requests that the Amendment more clearly explain how natural sources of bacteria are accounted for in the Bacteria Project I TMDL.

6. Attachment G, page 93, paragraph 1, states that the Phase II entities shall "develop and implement a Stormwater Pollution Prevention Plan (SWPPP) as required by section F.5.f.4 of this Order including additional measures necessary to achieve reductions in fecal coliform, enterococcus, and total coliform by the final compliance dates as required by the TMDL. The SWPPP must include short term and long term Best Management Practices (BMPs) strategies appropriate for the prioritization schedule in Attachment A pages A-63 through A-65 of Resolution No. R9-2010-0001". The current language is too broad and does not stipulate what facilities would be required to have a SWPPP, and it seems unreasonable to assume that all facilities that are potential bacterial sources would be subject to a SWPPP if those facilities did not also qualify as a pollutant hotspot (defined in section F.5.f.3 of the Small MS4 Permit). This paragraph should be clarified to state that the SWPPP's are only required for pollutant hotspots at high priority sites, previously identified in section F.5.f.3 of the Small MS4 Permit.