Mr. John Robertus  
California Regional Water Quality Control Board  
San Diego Region  
9174 Sky Park Court, Suite 100  
San Diego, CA 92123-4353

Dear Mr. Robertus:

SUBJECT: NAVY COMMENTS ON PROPOSED TMDL CLEAN WATER ACT SECTION 305(b)/303(d) INTEGRATED REPORT 2008 PCB LISTING FOR SAN DIEGO BAY NEAR SUBASE

This letter presents a justification for removing Polychlorinated biphenyls (PCBs) from the new proposed 2008 303(d) Toxic Maximum Daily Load (TMDL) list for San Diego Bay near Naval Submarine Base (SUBASE), San Diego. The listing should be removed from the list because:

1) The 2008 PCB TMDL proposed for San Diego Bay near SUBASE is redundant with a previous PCB listing for the San Diego Bay proposed in 2006 and adopted in 2008. The additional listing for a site specific SUBASE PCB TMDL derives no additional regulatory benefit or drivers for handling the PCB impairment in San Diego Bay. The current PCB TMDL for San Diego Bay (2006) has the same regulatory drivers as the SUBASE site specific listing.

2) The redundant listing will cause confusion on which TMDL deadline is applicable to the site, the bay-wide TMDL (Deadline of 2019) or the SUBASE TMDL (Deadline of 2021).

3) Redundant listings may cause duplicate studies and double the number reports for the same PCB condition.

4) In the quoted lines of evidence, it was stated that the PCB concentration was over the OEHHA screening level of 20 nanograms per gram at the site. The average concentrations of PCBs found at the site were below that found in reference station samples collected throughout San Diego Bay. This indicates a San Diego Bay-wide issue and not a site specific issue.

Also, it should be noted that the new listings of Copper and Chromium for Paleta Creek were based upon a Southern California Coastal Water Research Project (SCCWRP) sampling point that is upstream from Naval Base San Diego (NBSD). NBSD should not be listed as a stakeholder in this new TMDL since NBSD is...
downgradient of the sample point used to establish the line of evidence.

If you need further information regarding this submittal, please contact Mr. Len Sinfield, telephone (619)532-2280.

Sincerely,

Brian S. Gordon
Director, Compliance and Technical Division
By direction