



**DEPARTMENT OF THE NAVY**  
**COMMANDER NAVY REGION SOUTHWEST**  
937 NORTH HARBOR DRIVE  
SAN DIEGO CA 92132-0058

IN REPLY REFER TO:  
5090  
Ser N45/ D82  
November 3, 2017

Vicente Rodriguez  
California Regional Water Quality Control Board  
San Diego Region  
2375 Northside Drive, Suite 100  
San Diego, CA 92108

Dear Mr. Rodriguez:

**SUBJECT: NAVY PUBLIC COMMENTS ON THREE TENTATIVE ORDERS, 1- COMMENT - TENTATIVE ORDER NO. R9-2017-0009, 243989:VRODRIGUEZ, 2- COMMENT - TENTATIVE ORDER NO. R9-2017-0010, 248794:VRODRIGUEZ, AND 3- COMMENT - TENTATIVE ORDER NO. R9-2017-0011, 269450:VRODRIGUEZ**

Please find the enclosed comments from the Navy on Tentative Order Number R9-2017-0009, Amending Order Number R9-2013-0064, National Pollutant Discharge Elimination System (NPDES) Number CA0109169, Waste Discharge Requirements for the United States Department of the Navy Naval Base San Diego Complex, San Diego County enclosure 1, Tentative Order Number R9-2017-0010, Amending Order number R9-2014-0037, NPDES number CA0109363, Waste Discharge Requirements for the United States Department of the Navy Naval Base Point Loma Complex, San Diego County enclosure 2, and Tentative Order Number R9-2017-0011, Amending Order Number R9-2015-0117, NPDES Number CA0109185, Waste Discharge Requirements for the United States Department of the Navy Naval Base Coronado Complex, San Diego County enclosure 3, for your review and consideration. If you have any questions regarding this letter or any of the comments enclosed, please contact me at (619) 532-2273.

Sincerely,

A handwritten signature in black ink, appearing to read "L. D. Sinfield".

L. D. SINFIELD  
Water Program Manager  
By direction  
of the Commander

Enclosures: 1. Comments - Tentative Order Number R9-2017-0009 (NBSD)  
2. Comments - Tentative Order Number R9-2017-0010 (NBPL)  
3. Comments - Tentative Order Number R9-2017-0011 (NBC)

Comments - Tentative Order No. R9-2017-0011 (NBC)

Page No.	Section No.	Summary of Revision
13, F-24	IV.D.3 and F.III.D	Based on the available information there is evidence that the combination of Lake Henshaw dam and the Escondido Canal dam diversion prevent storm water runoff from Remote Training Site Warner Springs from reaching the mouth of the San Luis Rey River at the Pacific Ocean shoreline. Section IV.D.3, Tables F-12 and F-13 in Attachment F, and portions of Section III.D in Attachment F should be removed because RTSWS does not discharge to a tributary that contributes flow to the portion of the San Luis Rey River Watershed that reaches the Pacific Ocean.
19	IV.F.1	Authorized non-storm water discharges should also include Industrial Areas, and not just MS4 areas. The industrial areas have emergency eye wash/shower stations, building fire suppression systems, and fire hydrants that require flushing for health and safety concerns. Revise authorized non-storm water discharge description so it is clear that they are applicable to the whole facility not just small MS4 areas.
E-3	Section I.K	Add text to clarify in the new language added that if no authorized ML value is below the effluent limitation and the ML is no greater than the lowest ML value indicated in Attachment N of this Order (or if not listed in Attachment N of this Order, be the lowest ML provided in 40 CFR part 136), analytical results of ND or DNQ are not exceedances of effluent limitations listed in this Order and not a violation of this Order.
E-12	Attachment E, Section IV.B.2	Page E-12 of the NBC Permit (Attachment E.IV.B.2) describes chronic toxicity testing. The section should be revised to indicate that "Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to West Coast Marine and Estuarine Organisms, First Edition (EPA-600-R-95-136)" are the preferred methods given that purple urchin embryo development test is being used to assess chronic toxicity. It is a general understanding that the species used for NPDES permits should best represent local critters if possible, thus the West Coast Manual generally supersedes 821-R-02-014 if appropriate species are available
M-1	Attachment M	Update the Storm Water Risk level Designation Table with the information provided in the most recent NBC Annual Report, Table E-2.
N-1 through N-4	Attachment N	<p>Add text to clarify that if no authorized ML value is below the effluent limitation and the ML is no greater than the lowest ML value indicated in Attachment N of this Order (or if not listed in Attachment N of this Order, be the lowest ML provided in 40 CFR part 136), analytical results of ND or DNQ are not exceedances of effluent limitations listed in this Order and not a violation of this Order.</p> <p>Add text to clarify that the MLs included in Table N-1 and N-2 as per the SIP (page 24) are</p>

based on having no matrix interference. Matrix interference may result in the laboratory reporting a higher ML but should still be considered compliant.

Add text to indicate that if the concentration of analyte is detected above an ML and also above the effluent limitation, then the value of the ML with regard to effluent limitation should have no bearing. The value of the ML (excluding matrix interference) should only be required to be less than or equal to the effluent limitation when necessary to show that the concentration of an analyte is less than or equal to the effluent limit

Second paragraph, first sentence: change "give" to "given".

Comments for Table N-1:

- CTR No. 2: Arsenic - The EPA method listed, 206.3, has been withdrawn by the EPA as an acceptable method for arsenic analysis in drinking water. Remove method from the table.
- CTR No. 8: Mercury - for the analytical method, instead of listing "1631 (note)" list "1631(4)".
- CTR No. 9: Nickel - The EPA method listed, 249.2, has been withdrawn by the EPA as an acceptable method for nickel analysis in drinking water. Remove method from the table.
- CTR No. 11: Silver - The EPA method listed, 272.2, has been withdrawn by the EPA as an acceptable method for silver analysis in drinking water. Remove method from the table.