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**California Regional Water Quality Control Board, San Diego Region**

June 3, 2013

**Sent by e-mail only**

Mr. T. Michael Chee  
Manager, Environmental Engineering  
General Dynamics NASSCO  
MCHEE@NASSCO.COM

**In reply refer to:**  
243883: kschwll

Dear Mr. Chee:

**SUBJECT: Review of Self-Monitoring Reports (SMRs) for Order No. R9-2009-0099,  
NPDES No. CA0109134**

**FACILITY: National Steel & Shipbuilding Co (NASSCO)**

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) staff has reviewed the SMRs for the facility referenced above for the reporting periods of September 2009 through March 2013. Reports submitted after September 15, 2011, were submitted electronically. We have noted the following violations below:

1. The following reports were not received on time in violation of the reporting requirements under Attachment E – Monitoring & Reporting Program (MRP) – Section X.B.3, Table E.6. – Monitoring Periods and Reporting Schedule:
  - a. Monthly reports:
    - i. April 2009 monthly report due May 30, received June 2, 2009  
(Violation ID 948625)
    - ii. July 2009 monthly report due August 30, received September 2, 2009  
(Violation ID 948628)
    - iii. February 2011 monthly report due March 30, received April 1, 2011  
(Violation ID 948629)
    - iv. March 2011 monthly report due April 30, received May 3, 2011  
(Violation ID 948630)
    - v. April 2011 monthly report due May 30, received June 2, 2011  
(Violation ID 948631)
    - vi. September 2011 monthly report due October 30, received October 31, 2011  
(Violation ID 948624)

b. Quarterly reports:

- i. January – March 2011 quarterly report (Q1 2011) due April 30, received May 3, 2011 (Violation ID 948632)
- ii. July – September 2011 quarterly report (Q3 2011) due October 30, received October 31, 2011 (Violation ID 948619)
- iii. July – September 2012 quarterly report (Q3 2012) due October 30, received November 30, 2012 (Violation ID 948618)

c. Annual report:

July 2008 – June 2009 annual report due September 1, received September 2, 2009 (Violation ID 948633)

2. On December 12, 2011, approximately 500 gallons of storm water held in a containment area was discharged into San Diego Bay. This is a violation of Discharge Prohibition III.D of Order No. R9-2009-0099. (Violation ID 917399)
3. On March 18, 2011, paint chips, debris, and abrasive dust were floating on the starboard side of Floating Drydock. This is a violation of Discharge Prohibition III.F of Order No. R9-2009-0099. (Violation ID 906025)
4. Total Recoverable Zinc at HR-1 was reported at a concentration of 43 µg/L in the March 2012 monthly report which is above the average monthly effluent limitation of 31.29 µg/L authorized pursuant to section IV.A.2, Table 7 of Order No. R9-2009-0099. (Violation ID 935215)
5. On October 29, 2012, at approximately 1255 hrs. NASSCO Security was made aware of a discharge to San Diego Bay from Pier 12. Ten thousand (10,000) gallons of saltwater was discharged. The saltwater created a light orange discoloration in the receiving water, however, there were no visible sheens or floating debris in the subject area. This is a violation of Discharge Prohibition III.C of Order No. R9-2009-0099. (Violation ID 948212)
6. On January 20, 2013 a NASSCO employee reported rusty water overflow from the trough at the forward end of the floating dry-dock. CalMarine (a subcontractor to NASSCO) was conducting wash down operations of the floating dry-dock, the pump which transfers water from the trough to the waste water treatment facility was not primed causing the pump to pump air instead of water. At the time of discovery, about 30 gallons of rusty water had overflowed into San Diego Bay. This is a violation of Discharge Prohibition III.C of Order No. R9-2009-0099. (Violation ID 948464)

Please take steps to ensure that the violations noted above do not occur in the future. Pursuant to the California Water Code (CWC), the violations noted are subject to additional enforcement action(s) by the San Diego Water Board including a time schedule order, cease and desist order, cleanup and abatement order, imposition of administrative civil liability,

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General Dynamics NASSCO

June 3, 2013

referral to the district attorney for criminal prosecution, or referral to the attorney general. Administrative civil liability amounts that may be imposed by the San Diego Water Board under authority of CWC Section 13385 include up to \$10,000 per day, or up to \$10 per gallon for each gallon of waste discharged.

In the subject line of any response, please include the information located in the heading of this letter: "in reply refer to." For questions or comments, please contact Kristin Schwall at 858-467-2345 or [kschwall@waterboards.ca.gov](mailto:kschwall@waterboards.ca.gov).

Respectfully,



Wayne Chiu, P.E.  
Acting Senior Water Resource Control Engineer

Tech Staff Info & Use
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Order No.	R9-2009-0099
NPDES No.	CA0109134
CIWQS Place ID	243883 (National Steel & Shipbuilding Co)
WDID	9 000000066
Reg. Measure No.	369914 (R9-2009-0099)
Violation ID	See above
Enforcement	390352