



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 8, 2013

David Barker
Supervising Water Resource Engineer
San Diego Water Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123

Re: Draft NPDES Permit for the Naval Base San Diego Complex (NPDES Permit No. CA0109169)

Dear Mr. Barker:

Thank you for the opportunity to review and comment on the draft permit (NPDES Permit No. CA0109169) for the U.S. Navy's Naval Base San Diego Complex. We support your efforts in re-issuing this permit and encourage the Water Board to adopt a Final Order at the August 14, 2013 Board Meeting.

EPA has worked closely with the State and Regional Water Boards to ensure effluent limitations and testing are conducted consistent with federal and state requirements. EPA strongly supports the Proposed Order's inclusion of chronic toxicity numeric effluent limitations for industrial process wastewater and acute numeric effluent limitations for high risk industrial stormwater. Furthermore, EPA supports the proposed approach of using the *Test of Significant Toxicity* to conduct all toxicity testing required in the permit.

According to the proposed fact sheet, chronic toxicity data for high risk industrial stormwater outfalls are not available. Although EPA understands there is inadequate data to support requiring numerical effluent limitations, end-of-pipe monitoring for chronic toxicity should be incorporated into Table E-11 of the Order in order to inform future reasonable potential determinations. In addition to monitoring, the Water Board should include numerical thresholds for performing a toxicity reduction evaluation (TRE) and toxicity identification evaluation (TIE). At a minimum, monitoring requirements should be consistent with storm water discharge requirements in the Water Board's recently-adopted Boatyard General Permit (CAG719001) which requires twice annual monitoring for chronic toxicity.

Aside from toxicity requirements, Section IV.G.1.m. authorizes the discharge of incidental runoff from landscaped areas on the condition that the discharge does not contain quantities of pollutants that may cause or contribute to an exceedance of a water quality standard. The Water Board should incorporate monitoring to ensure that incidental runoff does not have an adverse effect on water quality, or remove the exemption consistent with the San Diego MS4 Permit (CAS0109266).

If you have any questions or would like to further discuss these comments, please contact Jamie Marincola of my staff at 415-972-3520 or via email at marincola.jamespaul@epa.gov.

Sincerely,



David Smith, Manager
NPDES Permits Office (WTR-5)