

RESPONSE TO WRITTEN COMMENTS

TENTATIVE ORDER NO. R9-2014-0006

Master Reclamation Permit
 for the United States Marine Corps Base Camp Pendleton,
 Northern Regional Tertiary Treatment Plant, San Diego County

Comments were received from the United States Marine Corps (USMC).

Comment No.	Tentative Order No. R9-2014-0006 Section	Comment	Responses
1.		Tentative Monitoring and Reporting Section- Currently labeled Attachment C, although it appears to have its own numbering. Consider revising and labeling as Attachment D. In the monitoring Section, the Flow rate, BOD, TSS, and pH monitoring location should all be moved to the end of the media filters since the discharge to the percolation ponds do not go through the chlorine contact basin.	Tentative Monitoring and Reporting Section was unintentionally labeled as Attachment C. It has been corrected to be a separate document not as an attachment. A modification was made to the monitoring and reporting program to move the monitoring location to after the media filters for effluent that will be discharged to the percolation ponds.
2.		Camp Pendleton requests permit rewording to reflect authority under CWA and SDWA and include/modify language that changes several sections to comply with laws and regulations which the United States Congress has provided a waiver of sovereign immunity. Request inclusion of these changes to assure permit is fully within jurisdiction of the Clean Water Act and/or Safe Drinking Water Act:	
2.1	Page 3, II.C	The words "to the extent permitted by federal law" should be included at the end of the last sentence.	Accepted.
2.2	Page 4, III.A	The words "to the extent permitted by federal law" should be included at the end of the last sentence.	Accepted.
2.3	Page 5, III.C	Recommend changing "waters of the State" to "waters of the United States"	Accepted.

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		or including the words “to the extent permitted by federal law” should be included at the end of the last sentence.	
2.4	Page 5, III.D	The words “to the extent permitted by federal law” should be included at the end of the last sentence.	Accepted.
2.5	Page 9, VI.A.1	The words “to the extent permitted by federal law” should be included at the end of the last sentence.	Accepted.
2.6	Page 10, VI.B	The words “to the extent permitted by federal law” should be included at the end of the second sentence.	Accepted.
2.7	Page 11, VI.D	The words “to the extent permitted by federal law” should be included at the end of the last sentence.	Accepted.
2.8	Page 11, VI.E	“Waters of the State” should be replaced with “waters of the United States.”	Accepted.
2.9	Page 12, VI.J	The words “to the extent permitted by federal law” should be included at the end of the first sentence; the words “applicable to federal facilities in accordance with federal law” should be added to the end of the last sentence.	Accepted.
2.10	Tentative Monitoring and Reporting Program, Page 3, I.K	The words “to the extent permitted by federal law” should be included at the end of the second sentence.	Accepted.
2.11	Tentative Monitoring and Reporting Program, Page 4, I.L	Recommend changing “waters of the State” to “waters of the United States” or including the words “to the extent permitted by federal law” at the end of the last sentence.	Accepted.
3.	Section IV.C	Discharge Specifications IV.C lists the average effluent flow to the percolation ponds shall not exceed 2.4 mgd. Special Provision VII.D requires submittal of a certification report showing that the treatment and disposal facilities have adequate capacity for the full design flow for secondary and tertiary treatment. The NRTTP design flow is 4.0 mgd (annual average daily flow). Current permitted	The percolation basin study did not include a water balance that included potential rainfall. Therefore, the discharge specification for the percolation pond capacity will remain at 2.4 mgd.

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		perc pond capacity is 2.38 mgd. Camp Pendleton recently completed a percolation basin capacity study of the ponds and the results indicate that the ponds are capable of receiving the full design flow of 4.0 mgd.	
4.	Table 5	Table 5, Discharge Specifications, shows 45 mg/L for Total Nitrogen. Should this be 4.5 mg/L, or possibly this represents a Nitrate specification?	Discharge Specification changed to 10 mg/L for Total Nitrogen as N.
5.	Attachment B, I.F&G	Attachment B, I.F&G are redundant with Special Provisions VII.D.5&6. Monitoring and Reporting Program I.L is redundant with permit Provisions VI.D.	San Diego Water Board does not agree. The staff recommends that the language/requirements be retained in Attachment B (Rules and Regulations) for recycled water use areas.