



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. R9-2017-0009 (NBSD)

Page No.	Section No.	Comments
2	Purpose of this Order, 8., 1 st sentence	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 sentence to “Section IV.G.1.i of Order No. R9-2013-0064 authorizes the following category of non-storm water discharges unless the Discharger or the San Diego Water Board identifies the discharge as a significant source of pollutants to Waters of the U.S.”
3	Purpose of this Order, 11.	Add the following bullet and amend sections to Order No. R9-2013-0064 as needed to meet request for Nickel Intake Water Credits: 11. By letter dated March 27, 2017, the Discharger submitted a Request for Nickel Intake Water Credits for the following discharges: 1) graving dock deflooding and salt water rinse water (Discharge Points Nos. NGD-001 & NGD-002), 2) caisson ballast dewatering (Discharge Point No. NGD-003), and 3) emergency fire suppression water and salt water supply water (Discharge Point No. NGD-004).
37	Section IV.G.1.	Revise to “1. Non-Storm Water Discharges. The following categories of non-storm water discharges are authorized under this Order unless the Discharger or the San Diego Water Board identifies the discharge category as a significant source of pollutants to waters of the US as provided in section IV.G.3 below” to include all areas of NBSD.
37	Section IV.G.1.c.	Remove “to MS4s” from bullet point.
37	Section IV.G.1.j.	Revise to “Residential and emergency service vehicle car washing”
30	Table 12	Water Effects Ratios (WERs) were approved by the SD RWQCB. Incorporate the WERs into the SAL table.
E-4	Attachment E, Section I.L	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-15	Attachment E, Section V.B.2	Page E-15 of the NBSD Permit (Attachment E.V.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.
E-24	Attachment E, Section VIII.A.ii (b2)	Replace the current language under the sediment toxicity section with the language from the NBC Order that states, “Short term survival tests and sublethal tests shall be performed as specified in section V.F of the State Board’s Sediment Quality Plan. The results shall be recorded as “Percent of control response”.” The current language only requires a 10-day amphipod test which is inconsistent with the two-species SQO analysis approach.

E-30 and E-32	Tables E-10 and E-11	Correct notations in both tables as they currently all refer to footnote 2, which is specific to pH only.
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 based on having no matrix interference. Matrix interference may result in the laboratory reporting a higher ML but should still be considered compliant.</p> <p>Add text to indicate that if an analyte is detected above an ML is 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 only when necessary to show that the concentration of an analyte is less than the effluent limit</p> <p>Second paragraph, first sentence: change "give" to "given".</p> <p>Comments for Table N-1:</p> <ul style="list-style-type: none"> • The table is not using the current IUPAC names for all compounds (1,2-Trans-Dichloroethylene, Tetrachloroethylene) • 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.