

The logo for SeaWorld Parks & Entertainment, featuring the company name in a serif font with a green and blue wave graphic below it.

SEAWORLD PARKS
& ENTERTAINMENT.

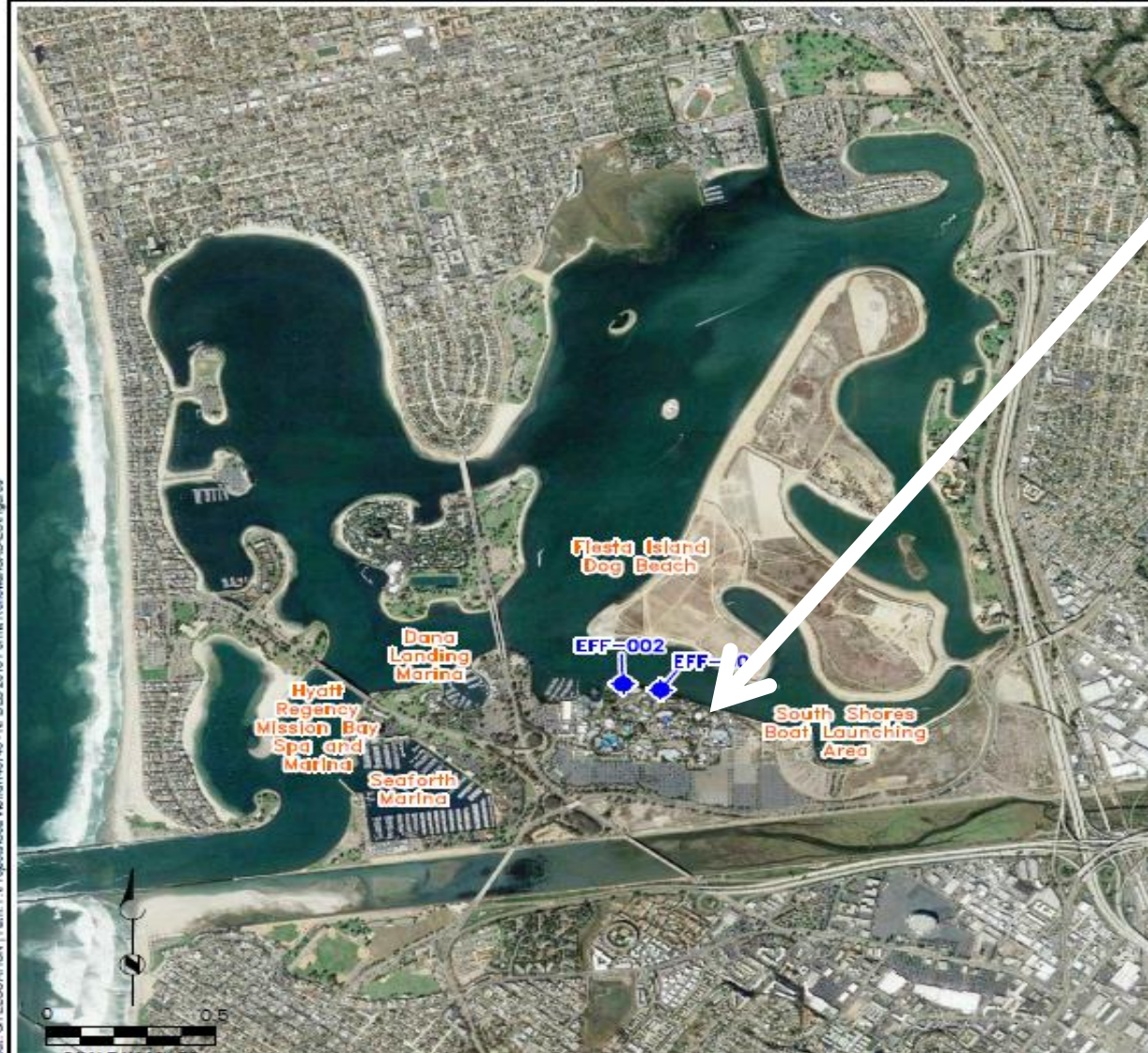
SeaWorld NPDES Permit Renewal

June 20, 2018

SeaWorld NPDES Permit

- Thank you to the San Diego RWQCB staff for their collaboration on the new permit
- Three areas of concern still exist
 1. Receiving Water Monitoring Program... *Where should SeaWorld test?*
 - 2. Frequency of sampling... *How often should SeaWorld test?***
 3. Excessive costs proposed... *How much testing is necessary and when does additional testing become burdensome?*

Receiving Water Monitoring Program and Conceptual Site Model (CSR)



Where should SeaWorld test?

- SeaWorld's location is in a small channel in the bay
- Other impacts on the bay
 - Storm water runoff
 - Fiesta Island Dog Beach
 - Boating, jet skis
 - Marinas

SeaWorld proposes Quarterly Testing for These Constituents

How often should SeaWorld test?

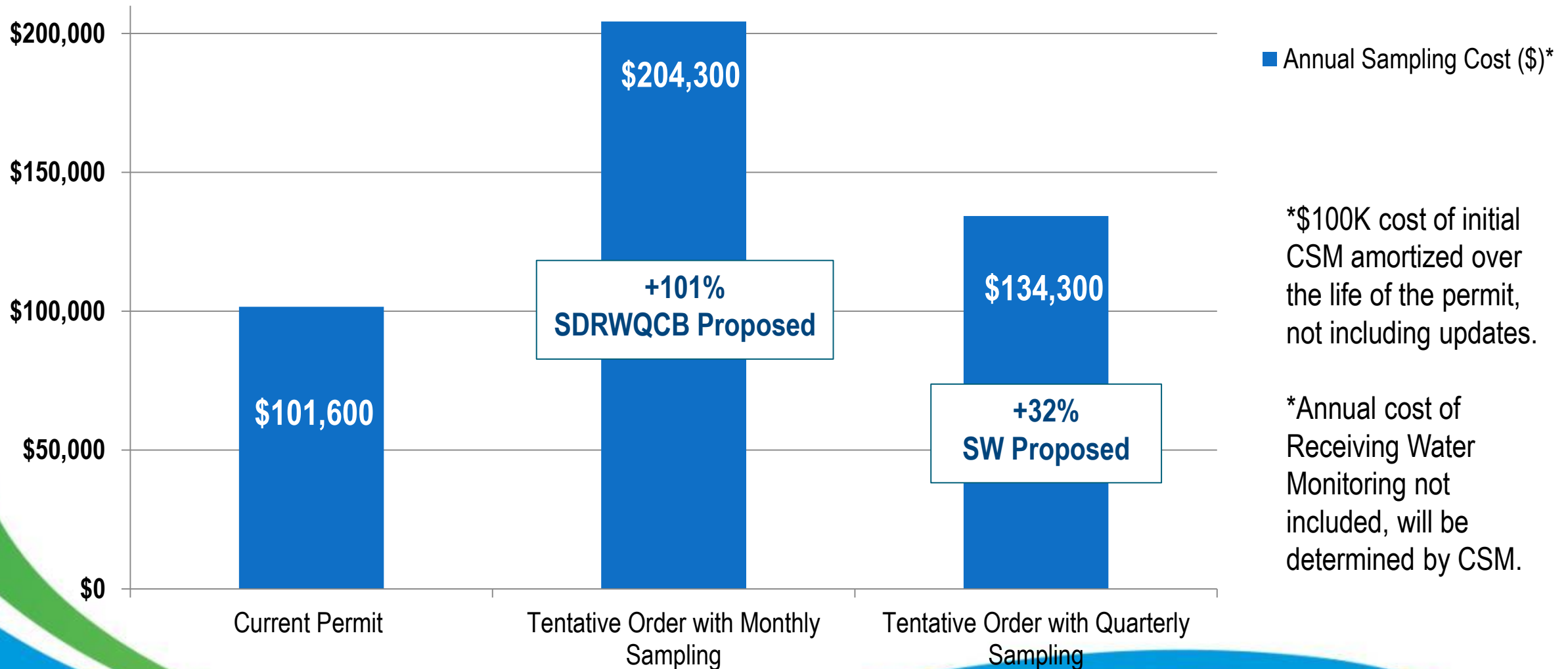
Frequency of Water Sampling for Parameters/Constituents

Parameter/Constituent	Current Permit		Tentative Order	
	Testing Frequency	# of Exceedances	Water Board Proposed Testing Frequency	SeaWorld Proposed Testing Frequency
Total Suspended Solids	Quarterly	0	1/Month	Quarterly
Settle-able Solids	Quarterly	0	1/Month	Quarterly
Turbidity	Semi-Annually	0	1/Month	Quarterly
Oil and Grease	Semi-Annually	0	1/Month	Quarterly
Ammonia, Unionized as N	Semi-Annually	0	1/Month	Quarterly
Copper, Total Recoverable	Quarterly	0	1/Month	Quarterly
Silver, Total Recoverable	Quarterly	0	1/Month	Quarterly



Total Annual Costs Proposed

When does additional testing become burdensome?



*\$100K cost of initial CSM amortized over the life of the permit, not including updates.

*Annual cost of Receiving Water Monitoring not included, will be determined by CSM.

What if There is an Exceedance?

SeaWorld proposes:

Quarterly Sampling

Exceedance

Accelerated Monthly Sampling

- For 3 months, or until within permit limits

Summary of SeaWorld's Request Today...

Concern

Receiving Water Monitoring Program

SeaWorld is in a narrow channel of the bay.
How much of the bay should SeaWorld be responsible for testing?

Request

Ensure that CSM and monitoring addresses only those waters that may be impacted by SeaWorld's discharge, instead of the entire bay.

Frequency of Sampling

The proposal of monthly testing is excessive, especially since we have had no exceedances for the constituents. SeaWorld has agreed to increase testing to quarterly for three constituents.

Approve quarterly sampling

Excessive Costs

The staff proposal imposes a 101% increase in costs. There is no data or facts to drive such a burdensome increase.

Approve quarterly sampling plus CSM
a 32% cost increase for SeaWorld

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Questions?

Thank You