

From: [Catherine Cope](#)
To: [sandiego](#)
Cc: [Rodriguez, Vicente@Waterboards](#); [Yaeger, Keith@Waterboards](#); [Steve Morris](#); [Jason Morris](#)
Subject: "Comment- Tentative Order No. R9-2019-0008"
Date: Thursday, August 29, 2019 2:45:22 PM
Attachments: [NPDES Comments Tentative Order NO. R9-2019-0008 August 28 2019.pdf](#)

Dear Vicente and Keith,

Attached please find Dana Point Shipyards comments to the above tentative order. If you have any questions, please do not hesitate to contact me via email or my direct line at 949-728-0244. Thank you for your time and we look forward to working with you in the future.

Sincerely,

[Catherine Cope](#)
[Vice President, CFO](#)
[Dana Point Shipyard](#)



Dana Point Shipyard

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August 28, 2019

San Diego Regional Water Quality Control Board
 2375 Northside Drive, Suite 100
 San Diego, Ca 92106-2700
 Attn: Vicente Rodriguez, Keith Yaeger

RE: Tentative Order No.R9-2019-0008, NPDES CAG719001,785854:VRodriguez

SENT VIA: EMAIL ONLY

Dear Vicente and Keith,

Thank you for meeting with Dana Point Shipyard on August 5, 2019 regarding the Tentative Order referenced above. The comments below were discussed at that meeting and we were asked to document our comments. We appreciate the time and effort you both have exhibited and we look forward to working with you in the future. Below are our comments:

1. Attachment G, Page 6, Application Requirements, A.1 "filing Fee". The language is confusing and we feel should be clarified throughout the entire tentative permit. All references to NOI and fee language should reflect "New NOI applications only" and NOI fee will not apply to existing permit holders.
2. Attachment D, Page D-2, F.2,3,4. The Board should consider changing language "at reasonable times" to "during Business hours"
3. Attachment E, Page E-6 thru E-11, Core Monitoring Requirements A.1, Table E- 3. The additional 6 pages of constituents/tests ect that are being proposed, may already be monitored and tested by other State and Local agencies, different coalitions, third parties etc and to now ask Boatyards to also monitor and sample for these additional constituents if a discharge occurs (equipment failure, power outage) may be causing double data collection and would be very cost prohibitive for most small boatyards.
4. BMP Inspections, Page E-33, D.1.A. "BMP inspections should be conducted on a weekly basis". While our facility has diligently tried to preform BMP inspections on a weekly basis during this last permit cycle, it is sometimes difficult to actually execute, especially during busy summer months. Would the Board consider Bi-weekly inspections for the new permit?
5. Forms, Attachment G, Page G.1. The first box. There is no box to check for "Renew existing boatyard permit" or other language the Board may want to use for existing permit holders. When I read this first question for the NOI application, there was no box to check for existing permit holders other than "Other"
6. Storm Water.Monitoring Requirements: This change in monitoring /sampling has change from "during business hours" (Sample collection if discharge occurs, which has been in effect for the last 30 years) to "anytime of the day". This was explained to us as meaning "24 hrs a day". We feel this requirement would be overly burdensome. We believe this may require us to install very costly equipment and to also have a person on site during the night in case there was an accidental discharge during a storm event due to possible power outage or equipment failure.

We would like to see the proposed language changed back to "during Business hours" if possible.

This concludes Dana Point Shipyards comments concerning the Tentative Order.

Again, we would like to thank you Vicente and Keith for meeting with us and discussing the proposed changes to the new permit.

If you should have any questions, please do not hesitate to call me directly at: 949-728-0244

Thank you for your time and consideration regarding these comments.

Sincerely,

A handwritten signature in blue ink that reads "Catherine Cope". The signature is written in a cursive style with a large initial 'C' and a long horizontal flourish at the end.

Catherine Cope
Vice President, CFO
Dana Point Shipyard