



California Regional Water Quality Control Board

San Diego Region

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August 3, 2009

Mr. A. C. Entingh
Head, Environmental Compliance Department
AC/S Environmental Security
U.S. Marine Corps Base
P.O.Box 555008
Camp Pendleton, CA 92055-5008

VIA CERTIFIED MAIL
7009 0820 0001 7183 7081

In reply refer to:
638334:rpierce

Dear Mr. Entingh:

SUBJECT: NOTICE OF VIOLATION NO. R9-2009-0141, REVIEW OF MONITORING REPORTS FOR CONDITIONAL WAIVER NO. 7- DISCHARGES OF RECYCLED WATER TO LAND AND ORDER NO. R9-2009-0021 MASTER RECLAMATION PERMIT, (REF: 5090.7C ENVSEC/427)

Enclosed is **Notice of Violation (NOV) No. R9-2009-0141** for United States Marine Corps (USMC) Southern Region Tertiary Treatment Plant located in Camp Pendleton, California. The California Regional Water Quality Control Board, San Diego Region (Regional Board) identified the violations cited in the NOV during the review of the eight monthly Monitoring Reports for the time period of October 2008 through May 2009 submitted in accordance with Conditional Waiver No. 7 and Order No. R9-2009-0021.

The USMC reported that corrective actions have been taken to address violations of the reporting requirements and discharge specifications. The next monitoring report due is the June 2009 report due by July 30, 2009.

In the subject line of any response, please include the requested "in reply refer to:" information located in the heading of this letter. If you have any questions regarding this matter, please contact Mr. Robert Pierce at (858) 627-3935 or at RPierce@waterboards.ca.gov.

Sincerely,

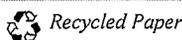
Robert Mann

for

Julie Chan, P.G.
Supervising Engineering Geologist
Groundwater Basins Branch

JAC:bm:rep

California Environmental Protection Agency



Enclosures: Notice of Violation No. R9-2009-0141

CIWQS:

Regulatory Measure ID	350670
Place ID	638334
Enforcement ID	369155 (NOV)
Violation ID	831851 831852 831853 831854 831858 831860 831861 831863

August 3, 2009

IN THE MATTER OF

United States Marine Corps
Marine Corps Base
Camp Pendleton, CA 92055-5008

NOTICE OF VIOLATION
NO. R9-2009-0141

WDID NO.
9 000001834

In reply refer to:
638334:rpierce

Conditional Waiver No. 7- Discharges of Recycled Water to Land
Order No. R9-2009-0021 Master Reclamation Permit, U.S. Marine Corps

SITE: SOUTHERN REGION TERTIARY TREATMENT PLANT, MARINE CORPS
BASE CAMP PENDLETON, CALIFORNIA

YOU ARE HEREBY NOTIFIED THAT:

The U.S. Marine Corps (USMC) was in violation of Conditional Waiver No. 7- Discharges of Recycled Water to Land and waste discharge requirements issued by the California Regional Water Quality Control Board, San Diego Region (Regional Board) in Order No. R9-2009-0021 *Master Reclamation Permit for Southern Region Tertiary Treatment Plant, United States Marine Corps, Camp Pendleton, in San Diego County*. These violations subject the discharger to possible further enforcement action by the Regional Board, including administrative enforcement orders requiring USMC to cease and desist from violations, or to clean up waste and abate existing or threatened conditions of pollution or nuisance; and referral to the State Attorney General for injunctive relief.

The Regional Board reviewed the eight monthly Monitoring Reports listed below.

PERIOD	REPORT DATE	DATE RECEIVED
October 2008	November 26, 2008	December 1, 2008
November 2008	December 23, 2008	December 24, 2008
December 2008	January 29, 2009	January 30, 2009
January 2009	February 26, 2009	February 27, 2009
February 2009	March 30, 2009	March 30, 2009
March 2009	April 29, 2009	April 30, 2009
April 2009	May 27, 2009	May 29, 2009
May 2009	June 29, 2009	June 30, 2009

California Environmental Protection Agency

Eight total violations were identified in the Monitoring Reports, four violations of Conditional Waiver No. 7 and four violations of Order No. R9-2009-0021. The USMC has reported taking corrective actions in response to these violations including additional contractor training, source control sampling, and cleanup and repairs related to spills. Exceedance of discharge specifications at the Southern Region Tertiary Treatment Plant (SRTTP) have prompted operational changes to refine the treatment processes. The discharge of reclaimed water was regulated by the SRTTP enrollment in Conditional Waiver No. 7 until adoption of Order No. R9-2009-0021 on March 11, 2009 superseded the Waiver.

Summary of Violations:

I. **CONDITIONAL WAIVER NO.7; MONITORING AND REPORTING PROGRAM**

This conditional waiver required the USMC to comply with the reporting requirements of the Monitoring and Reporting Program for Order No. 2000-45, including specification B.3. requiring weekly samples for biochemical oxygen demand (BOD) and total suspended solids (TSS).

Samples were not collected properly four times: the week of January 12, 2009 and the week of January 19, 2009 for both BOD and TSS each week.

II. **ORDER NO. R9-2009-0021, DISCHARGE SPECIFICATION A.1.**

This discharge specification prohibits discharges of wastes to lands which have not been specifically described in the report of waste discharge and for which valid waste discharge requirements are not in force.

Treated effluent was discharged to unspecified lands during spills one time on May 12, 2009 when 1,000 gallons of recycled water spilled and percolated into the ground near Gooseneck Lake.

III. **ORDER NO. R9-2009-0021, DISCHARGE SPECIFICATION B.4.**

This discharge specification states that the discharge from SRTTP to the Irrigation Areas shall not contain constituents in excess of the following effluent limitations:

Constituent (Unit)	30-Day Average	Daily Maximum
Chloride (mg/L)	NA	325

August 3, 2009

The concentration of chloride in the effluent exceeded the daily maximum limitation of 325 milligrams per liter (mg/L) on March 31, 2009 and April 9, 2009 with measured values of 400 and 344 mg/L respectively.

IV. ORDER NO. R9-2009-0021, DISCHARGE SPECIFICATION B. 6.

This discharge specification states that the discharge from SRTTP to the Irrigation Areas shall not contain total nitrogen (as N) in excess of 5.0 mg/L as a daily maximum.

The concentration of total nitrogen in the effluent exceeded the daily maximum on May 18, 2009 with a measured value of 5.3 mg/L.

Robert Marris

08/03/2009
DATE

for

Julie Chan, Supervising Engineering Geologist
Groundwater Basins Branch
JAC:bm:rep