

**US Navy Comments on Tentative Order No. R9-2015-0012
 Waste Discharge Requirements for Remote Training Site Warner Springs Wastewater Treatment System**

Document	Page / Section	Subject	Comment
Tentative Order	1 / Table 1	Facility name	The complete facility name is "Remote Training Site Warner Springs" abbreviated as "RTSWS"
Tentative Order	5 / III.C.	Percent nitrogen reduction discharge specification	Historic influent and effluent total nitrogen data are not available because monitoring of this parameter has not been required in the past (note: effluent nitrate as nitrogen has been consistently monitored). Although the new Orenco AdvanTex AX100 wastewater treatment system is expected to be capable of significantly reducing total nitrogen concentrations, it is possible that at times based on the influent wastewater composition, the influent total nitrogen concentration will already be relatively low and a 50-percent reduction may not be practicable for this system. In addition, the assimilative capacity analysis performed for effluent nitrate as nitrogen demonstrates that the discharge is not expected to cause the concentration of nitrate downgradient or beneath the site to exceed the nitrate groundwater quality objective in the Water Quality Control Plan for the San Diego Basin. Therefore it is requested that the discharge specification to achieve a 50-percent reduction in total nitrogen when comparing total nitrogen concentrations of influent and effluent samples collected on the same day be eliminated or revised to a performance goal only.
Tentative Order	6 / IV.A.3.a.	San Diego Water Board, or representative, entrance to facility upon presentation of credentials	Due to the sensitive and secure nature of the training that goes on at this facility, it may not always be possible to grant access to some or all of the facility during training exercises. Therefore, request this section be revised to indicate "a. Enter, at reasonable times, upon the Discharger's premises..."
Tentative Order	9 / IV.C.1.b.	Two-way telemetric alarm	As alluded to in the Tentative Order, it may be impracticable to equip the wastewater treatment system with a two-way telemetric alarm. In addition, if it is deemed practicable, due to federal acquisition rules it may take a couple years to program the funding and install the equipment.
Tentative Order	9 / IV.C.1.e.	Provision for 100-foot distance from water sources	The wastewater treatment system is located in accordance with the lease agreement with the US Forest Service. There is an ephemeral stream located within 100 feet of certain portions of the wastewater treatment system and spray irrigation field. Due to the existing lease agreement, it is not possible to relocate these systems. Request this provision be removed.

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Tentative Order	10 / IV.C.4.	Service provider	The Navy maintains trained qualified staff to operate, maintain, and monitor their wastewater treatment systems. Request this section be revised to indicate "The Discharger shall utilize trained qualified Government staff or obtain and maintain a contract with a service provider..."
Tentative Order	10 / IV.C.5.	Sewage solids and sludge specifications	The Government maintains a Trucked Industrial Waste Generator Permit with the City of San Diego and uses a contracted vendor that maintains a Trucked Industrial Waste Hauler Permit with the City for transportation and disposal of waste activated sludge from the wastewater treatment system. The City of San Diego manages their solids and sludge in accordance with applicable Federal and California regulations. Request this section be revised, as necessary, to also allow for this solids/sludge management approach.
Attachment C – Information Sheet	C-1 / I.A.	Typographic	Second line, revise "..., San Diego Count2015-0012y." to "..., San Diego County."
Attachment C – Information Sheet	C-9 / VI.C.4.	Service provider	The Navy maintains trained qualified staff to operate, maintain, and monitor their wastewater treatment systems. Request this section be revised to indicate the Discharge shall utilize trained qualified Government staff or maintain a contract with a service provider.
Tentative MRP	6 / VII.C.4.	Log of alarm notifications	It may be impracticable to equip the wastewater treatment system with a two-way telemetric alarm. In addition, if it is deemed practicable, due to federal acquisition rules it may take a couple years to program the funding and install the equipment.
Tentative MRP	6 / VII.C.5.	Typographic	Second line, it appears the reference is intended to be "... Section VI of the MRP." instead of "... Section V of the MRP."