

Response to Comments

United States Navy (Navy)
San Clemente Island Wastewater Treatment Plant (SCI WWTP)
Tentative Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit (Tentative)
NPDES No. CA0110175

Comment Letter dated March 18, 2024 from the Navy

#	Comments	Response	Action Taken
1	<p>Table 3 of the Order. Revise the Order effective date to January 1, 2025. The effective date of Tentative Order R4-2024-XXX of June 1, 2024, should be revised to January 1, 2025, to align with the annual monitoring period of January 1st to December 31st that is found in both the Tentative Order and the current SCI WWTP NPDES Permit Order Number R4-2018-0156. Changing the effective date of the permit to the beginning of a new monitoring year would simplify monitoring and reporting (i.e., not starting the new Order in the middle of a monitoring period) and allow the Navy sufficient time to modify existing wastewater sampling and analysis contracts to accommodate the new monitoring requirements.</p>	<p>The San Clemente Island Wastewater Treatment Plant (“SCI WWTP” or “Facility”) is operating under Order No. R4-2018-0156, which expired on December 31, 2023, but was administratively continued because the Discharger submitted a timely Report of Waste Discharge and complied with the federal NPDES requirements for continuation of expired permits. Pursuant to California Code of Regulations (CCR), title 23, section 2235.4, the terms and conditions of an expired permit are automatically continued pending reissuance of the permit, if the permittee complies with all federal NPDES requirements for continuation of expired permits. Order No. R4-2018-0156 has continued to be effective until a new order is adopted and becomes effective. Although the federal regulations allow for the continuation of expired permits to extend beyond the permit expiration date, section II.F.2. of the Memorandum of Agreement between the United States Environmental Protection Agency and the California State Water Resources Control Board</p>	<p>Revisions have been made to the Tentative Order.</p>

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		<p>(https://www.epa.gov/sites/default/files/2013-08/documents/ca-moa-npdes_0.pdf) states that NPDES permits shall become effective 50 days after adoption if USEPA has not objected to the permit and there has been significant public comment on the permit or if changes are made to the latest version of the draft permit that was sent to the USEPA.</p> <p>In addition, there are new requirements in the Tentative Order that were not included in the previous order to make the order consistent with current policies, regulations, and changes in water quality. Delaying the effective date of the adopted permit by 8 months is not appropriate because it will postpone implementation of the new requirements.</p> <p>However, since the effective date of the Tentative Order is only 36 days after the adoption date, the Los Angeles Water Board agrees to extend the effective date of the Tentative Order to July 1, 2024. Since the Permittee submits quarterly reports, this change also simplifies reporting because the effective date is on the first day of the following quarter.</p>	
2	<p>Table 4 of the Order. Performance Goals have been updated. What prompted these changes to the Performance Goals of certain constituents in Table 4?</p>	<p>Performance goals are updated during every permit cycle to be consistent with the current performance of the Facility. The Tentative Order's Fact Sheet, section 5 describes the Los</p>	<p>None necessary.</p>

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		Angeles Water Board's rationale and procedures for determining the appropriate performance goals.	
3	<p>Table 4 of the Order. Regarding the effluent 85% removal rate for TSS and BOD, add a footnote to read: "The removal efficiency final effluent limitation does not apply in situations where the concentration of the influent wastewater is too low to meet the 85% removal, per 40 CFR 133.103(d), so long as the treatment works is meeting the final effluent limitations for BOD and TSS." This would simplify reporting. If the effluent BOD and/or TSS removal rates are less than 85% but the effluent results are less than the applicable effluent limitation no additional explanation is required.</p>	The Los Angeles Water Board agrees to add the language from the footnote included in the previous permit to address the less concentrated influent wastewater to section 4.1.2.a of the Order.	Revisions have been made to the Tentative Order.
4	<p>Section 4.3 of the Order. Revise Section 4.3 (Recycling Specifications) to match the text in Order R4-2018-0156 as follows: "Recycling specifications are not established in this Order but the Navy produces and reuses recycled water under Order No. R4-2015-0107." Order R4-2018-0156 acknowledges that NALF SCI already recycles wastewater and has coverage under a separate Order (R4-2015-0107) to produce recycled wastewater. It is feasible, the Navy is already doing it, so a feasibility study is not necessary.</p>	The purpose of the feasibility study requirement is to encourage dischargers to investigate the feasibility of recycling more water and to determine strategies to use water more efficiently. The Los Angeles Water Board commends the Permittee on the amount of recycled water it currently produces, but a portion of the wastewater is still discharged to the ocean to an Area of Special Biological Significance. The feasibility study is a way for the Permittee to continue investigating potential uses of its wastewater and to reduce the amount of wastewater discharged into the ocean. The fact that the Navy produces and reuses recycled	None necessary.

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		water under Order No. R4-2015-0107 is in Fact Sheet section 2.1.3 of the Tentative Order.	
5	<p>Section 5.1.1.a of the Order. Add the following wet-weather language: “During a wet-weather event, storm water runoff may impact the shoreline, inshore, and offshore stations. The day of rain (0.1 inch and greater) plus three following days’ worth of bacteriology data should be excluded from single sample, geometric mean limits, and statistical threshold value (STV) calculations.” Request the addition of wet weather provisions for geometric mean, statistical threshold value (STV) and single sample calculations to account for situations where receiving water samples are impacted by storm water runoff. This is consistent with similar language in Order R4-2018-0156, Section V.A.1.a.</p>	<p>The State Water Board Water-Contact Objectives are required in this permit based on section II.B.1.a. of the Ocean Plan. The Ocean Plan does not provide for an exclusion to rain or stormwater runoff. To be consistent with the Ocean Plan, no exception is provided for wet weather in this Order.</p>	None necessary.
6	<p>Section 6.3.2. of the Order. Remove the requirement to submit an updated dilution study work plan. Personnel from the Naval Information Warfare Center Pacific (NIWC) reran the dilution model with zero current in February 2024 CORMIX, a US EPA-supported mixing zone model and decision support system. When running CORMIX below 2cm per second ambient, the model is not able to run until it reaches equilibrium, is unstable, and does not provide quality data. The model was run at various current speeds from 60cm/sec to 1 cm/sec, calculating the dilution factor (DF) for each, and then plotting a regression hoping to be able to extrapolate to zero</p>	<p>Order No. R4-2018-0156 states, “The Navy shall submit a dilution study work plan to the Regional Water Board for approval by the Executive Officer within 180 days of the effective date of this permit describing the timeline and procedures that will be used in the study.” On November 8, 2019, the Los Angeles Water Board responded to the Navy’s Dilution Study Work Plan submitted on August 29, 2019 (“Comment Letter”). The Navy never submitted an updated work plan and instead submitted a final report that did not address all the issues the Los Angeles Water Board raised in the</p>	None necessary.

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	<p>current. Based on the results of the CORMIX runs, it appears the CORMIX model is not capable of handling ambient currents below 2cm/sec and those data are not accurate. It is not appropriate to use a zero current situation in CORMIX and no ambient flow conditions is unrealistic for the SCI environment.</p>	<p>Comment Letter. The Navy also did not submit the results of the modeling run discussed in the Discharger's comments on the Tentative Order. The Los Angeles Water Board understands there are limitations with the modeling software with discharges closer to the shoreline when removing currents from the model; however, the final report must discuss these limitations and how they may impact the final results. Since the Navy has not responded to the Los Angeles Water Board's Comment Letter on the dilution study work plan, an updated work plan and a final report addressing the comments to the work plan are required to ensure the conclusions from the dilution study are substantiated.</p>	
7	<p>Section 6.3.3.a of the Order. Although specific facilities at SCI have coverage under State Water Board Water Quality Order Number 2014-0057-DWQ amended by Order 2015-0122-DWQ and Order 2018-0028-DWQ, NPDES Number CAS000001, General Permit for Storm Water Discharges Associated with Industrial Activities (IGP), the SCI WWTP is not regulated as an industrial facility under the IGP. Attachment A of 2014-0057-DWQ identifies the facilities that are covered by the IGP. For "Sewage and Wastewater Treatment Works" the two criteria triggering coverage are (1) a design flow 1 million gallons per day or (2) required to have a pretreatment program. The SCI WWTP has design flow well under</p>	<p>The Los Angeles Water Board agrees that the <i>General Permit for Storm Water Discharges Associated with Industrial Activities</i> (IGP) does not apply to sewage or wastewater treatment works with a design capacity of less than one million gallons per day and is not required to have a pretreatment program. Since SCI WWTP's design flow is less than 1 MGD and is not required to have a pretreatment program, the Facility is not currently enrolled in the IGP. Therefore, the Los Angeles Water Board revised section 6.3.3.a of the Tentative Order to be "Not Applicable." The Los Angeles Water Board also revised section 3.5.3 of the Fact Sheet of the</p>	<p>Revisions have been made to the Tentative Order.</p>

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	1 MGD and as stated on Page F-22 of the fact sheet “There are currently no industrial users in the FOTW’s service area; therefore, no pretreatment requirements are included in this Order.”	Tentative Order to indicate that SCI WWTP is not regulated under the IGP.	
8	<p>Section 6.3.3.c.v of the Order. Draft permit states, “An annual status report that shall be sent to the Los Angeles Water Board...”</p> <p>Is this a separate report from the Annual Monitoring Report? Please clarify.</p>	This section describes the reporting requirements for a Pollutant Minimization Program. If the Permittee has a Pollutant Minimization Program for specific pollutants, the Permittee may submit the annual report with the routine Annual Monitoring Report.	None necessary.
9	<p>Section 6.3.4.b of the Order. Remove the requirement to include greenhouse gas emissions in a Climate Change Plan. The Navy addresses greenhouse gas emissions under programs other than its NPDES program. Because greenhouse gas emissions are not regulated by this permit, it should not be included in a Climate Change Plan.</p>	On March 7, 2017, the State Water Board adopted a resolution in recognition of the challenges posed by climate change that requires a proactive approach to climate change in all State Water Board actions, including drinking water regulation, water quality protection, and financial assistance (Resolution Number 2017-0012). The resolution lays the foundation for a response to climate change that is integrated into all State Water Board actions, by giving direction to the State Water Board divisions and encouraging coordination with the Los Angeles Water Board. The Los Angeles Water Board also adopted “A Resolution to Prioritize Actions to Adapt to and Mitigate the Impacts of Climate Change on the Los Angeles Region’s Water Resources and Associated Beneficial Uses” (Resolution Number R18-004) on May 10, 2018. The resolution summarizes	None necessary.

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		<p>the steps taken so far to address the impacts of climate change within the Los Angeles Water Board's programs, and lists a series of additional steps, including the identification of potential regulatory adaptation and mitigation measures that could be implemented on a short-term and long-term basis by each of the Los Angeles Water Board's programs to mitigate the effects of climate change on water resources and associated beneficial uses where possible. Consistent with this resolution, the Los Angeles Water Board has been including a requirement to submit a Climate Change Plan into all NPDES permits since 2020. Operation of the Facility generates greenhouse gases, and greenhouse gas emissions trigger changes to climatic patterns, which increase the intensity of sea level rise and coastal storm surges, lead to more erratic rainfall and local weather patterns, trigger a gradual warming of freshwater and ocean temperatures, and trigger changes to ocean water chemistry. Therefore, greenhouse gas emissions are an essential part of the Climate Change Plan. The Climate Change Plan may reference other programs and plans that address greenhouse gas emissions, but this discussion must indicate how greenhouse gases are being addressed at the Facility.</p>	
10	<p>Section 6.3.6.a.ii of the Order. Delete the last three (3) sentences in this section, starting with "In addition,</p>	<p>The SCI WWTP discharges treated effluent to the Pacific Ocean. The Pacific Ocean's</p>	<p>None necessary.</p>

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	<p>the Permittee shall notify other interested persons...” NALF SCI is a remote island off the southern California coast used for military training activities with a small wastewater treatment plant. There are no cities within the jurisdiction of where a spill could occur, and the public affected by spills on the island would be personnel stationed on the island.</p>	<p>beneficial uses, which include Recreation, Navigation, Commercial and Sport Fishing, Marine Habitat, Wildlife Habitat, Preservation of Biological Habitats, Rare, Threatened, or Endangered Species, Shellfish Harvesting, could be impacted directly or indirectly by a spill and/or odors from the SCI WWTP. A spill could potentially affect persons beyond the military personnel stationed on the island. As such, the Tentative Order requires the Discharger to contact any interested persons, including the South Coast Air Quality Management District, Heal the Bay, and any city within the jurisdiction of the spill. The Discharger should contact nearby cities to determine if they want to be contacted of spills and/or odors that may impact people on the mainland or those recreating in the ocean.</p>	
11	<p>Section 6.3.6.b of the Order. Tentative Order R4-2024-XXX states, “To define the geographical extent of the spill’s impact, the Permittee shall obtain grab samples for all spills, overflows or bypasses of any volume that reach any waters of the state (including shoreline, surface, groundwaters, etc.).”</p> <p>Please clarify if the grab samples mentioned are from the receiving water or from the overflow.</p>	<p>The purpose of this requirement is to define the geographical extent of a spill’s impact, so grab samples may be collected from the overflow and/or the surface waters. Collecting samples from the overflow helps characterize the waste being discharged, whereas samples from the surface waters are used to determine the area impacted by the spill.</p>	None necessary.
12	<p>Section 5.5.1 of Attachment D of the Order. Does this include sampling exceedances?</p>	<p>The twenty-hour reporting shall cover <u>any</u> noncompliance which may endanger health or</p>	None necessary.

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		the environment, including effluent and receiving water limitation exceedances.	
13	Section 1.16 and section 1.17.2 of MRP of the Order. Is it possible to have LARWQCB provide the actual SCCWRP guidance in the permit?	The Los Angeles Water Board has already incorporated the SCCWRP guidance when developing the monitoring program for the Facility and this is reflected in the Tentative Order. The guidance can be found at the following link: Model monitoring program for large ocean discharges in southern California (sccwrp.org) (https://ftp.sccwrp.org/pub/download/documents/TechnicalReports/357_model_monitoring_program.pdf).	None necessary.
14	Section 1.19 of MRP of the Order. Please clarify if the DMRQA/Water Pollution Performance Evaluation study is now required to be submitted as an annual report.	Major and selected minor dischargers under the National Pollutant Discharge Elimination System (NPDES) program are required to participate in the annual Discharge Monitoring Report- Quality Assurance (DMR-QA) Study program. DMR-QA evaluates the analytical ability of the laboratories that perform self-monitoring analyses required by their NPDES permit. If the Discharger is selected by USEPA to participate in DMR-QA, results of DMRQA Study or the most recent Water Pollution Performance Evaluation Study shall be submitted annually to the State Water Board. This is not a requirement for the routine annual self-monitoring reports required in the Tentative Order that are submitted to the Los Angeles Water Board.	None necessary.

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15	<p>Table E-8 of MRP of the Order. On page F-57 of the NALF SCI WWTP Fact Sheet the proposed effluent monitoring frequency in Table E-8 is explained as follows:</p> <p>“Monitoring for those pollutants expected to be present in the discharge from the Facility is required as set forth in the MRP and as required in the Ocean Plan. Monitoring frequencies for the constituents are based on historic monitoring frequency, Best Professional Judgment, and the following criteria:</p> <p>Criterion 1: Monthly monitoring will be considered for those pollutants with reasonable potential to exceed water quality objectives (monitoring has shown an exceedance of the objectives);</p> <p>Criterion 2: Quarterly monitoring will be considered for those pollutants in which some or all the historic effluent monitoring data detected the pollutants, but without reasonable potential to exceed water quality objectives; and</p> <p>Criterion 3: Semiannual monitoring will be considered for those pollutants in which all the historic effluent monitoring data have had non-detected concentrations of the pollutants and without current reasonable potential to exceed water quality objectives.”</p> <p>The frequency for Criterion 3 parameters should be reduced from semiannual to annual because during the course of the current NPDES permit all the results</p>	<p>The MRP was developed in accordance with NPDES regulations, the Water Code, and statewide policies that govern the Los Angeles Water Board. The least frequent effluent monitoring frequency in the Tentative Order is semiannual, which is consistent with the previous NPDES permit (Order No. R4-2018-0156) and with other NPDES permits issued in the Los Angeles region. The Los Angeles Water Board finds that semiannual monitoring is the minimum amount of monitoring required for Ocean Plan pollutants because it is more representative of water quality throughout an entire year (collected during summer and winter) and it is the minimum number of samples needed for a robust reasonable potential analysis.</p> <p>The Los Angeles Water Board also acknowledges that the SCI WWTP is not a large ocean discharger, and is described as a minor discharger in section 1 of the Fact Sheet of the Tentative Order. However, the guidance document that the Discharger cites is not the sole basis for determining the appropriate monitoring requirements. The fact that the SCI WWTP discharges to an ASBS and the fact that the method detection limits achieved for several pollutants were not sufficiently sensitive are</p>	None necessary.

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	<p>for the parameters in the effluent were non-detect and there is no reasonable potential to exceed water quality objectives.</p> <p>While LA RWQCB staff justify the monitoring requirements by relying on SCCWRP Guidance in Model Monitoring Program for Large Ocean Permittees in Southern California (Schiff, K.C., J.S. Brown and S.B. Weisberg, 2001), the LA RWQCB may be misapplying the guidance.</p> <p>Below are four factors that support reduction in frequency of Criterion 3 parameters.</p> <p>First, NALF SCI WWTP is not comparable to a large ocean discharger. The NALF SCI WWTP has a discharge volume that is a small fraction of a large ocean discharger.</p> <p>Second, the guidance document discusses effluent monitoring within the framework of risk. Page F-57 of the NALF SCI WWTP fact sheet says that there is no reasonable potential for Criterion 3 parameters to exceed water quality objectives. If there is no reasonable potential to exceed water quality objectives, then the risk is low.</p> <p>Third, the guidance document discusses effluent monitoring within the framework of variability. These parameters have been non-detect in all results. Non-detect in all results means that variability is very low.</p>	<p>important factors considered when monitoring requirements were prescribed in the MRP.</p> <p>The Discharger is required to use analysis methods that are sufficiently sensitive as required in section 3.2 of the Standard Provisions. The variability in results that are reported as not detected while using methods that are not sufficiently sensitive cannot be described with certainty since it is unclear if the pollutant was detected at a concentration below the more sensitive detection limit.</p> <p>Finally, the dilution factor was used during the reasonable potential analysis, so the dilution factor was already considered when prescribing monitoring frequencies.</p>	

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	Finally, the Tentative Order already includes a 1:136 dilution for its effluent.		
16	<p>Table E-8 of the MRP of the Order. Provide clarification on what is meant by the 50 ng/L reporting limit (Is that for each individual PFAS parameter, only specific PFAS parameters, or PFAS as a whole? Is it dependent on sample method used?). Add text in a footnote to only require PFAS effluent monitoring for one year, rather than the duration of the permit. Semi-annual sampling for one year will provide adequate data to assess the presence and concentration of PFAS in discharges. This is consistent with USEPA's memo dated December 5, 2022, updating guidance for addressing PFAS discharges in NPDES permits. EPA direction does not specify the duration of the monitoring requirement, only that there is adequate data to assess the presence and concentration of PFAS in discharges. There are no industrial processes at NALF SCI that discharge to the wastewater treatment plant and the facilities in the vicinity of the SCI airfield do not discharge to the wastewater treatment plant.</p>	<p>The Los Angeles Water Board revised the footnote for PFAS analysis in Table E-8 to require the newly approved USEPA Method 1633 for PFAS analysis. Method 1633 was recommended for PFAS analysis in the USEPA Memorandum of <i>Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs</i> dated December 5, 2022. The reporting limits shall be consistent with the reporting limits described in the method, so the reference to 50 ng/L has been removed. If the Discharger wants to conduct an alternative ELAP-accredited method for PFAS, the Discharger shall submit a request to use an alternative method to the Los Angeles Water Board for approval.</p> <p>Semiannual monitoring for one year will not provide adequate data to assess the presence and concentrations of PFAS in the discharge because the number of people on the island changes throughout the year, water quality is subject to seasonal changes, and the efficiency of the treatment plant also changes over time. The Tentative Order therefore includes semiannual monitoring of PFAS for the duration of the permit cycle.</p>	Revisions have been made to the Tentative Order.

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		<p>Even though there may not be industrial processes at SCI that discharge to the SCI WWTP, industrial pollutants such as TCDD equivalents have been detected at concentrations exceeding the water quality objectives and may therefore enter the SCI WWTP influent through other means such as air deposition. In addition, PFAS compounds are not limited to industrial discharges. For example, PFAS can be found in food packages, stain resistant coating, nonstick cookware, and personal care products. Since the SCI WWTP receives waste from living quarters and kitchens, PFAS is likely to be present in the effluent from the facility and the presence of PFAS therefore needs to be investigated.</p>	
17	<p>Table E-7 of the MRP of the Order. Halomethanes are to be calculated – Can LA RWQCB provide the calculation we must use for this?</p> <p>Additionally, can LA RWQCB list the remaining pollutants in all tables that reference the Ocean Plan?</p>	<p>Halomethanes shall be calculated consistent with the definition in Attachment A of the Tentative Order, which defines halomethanes as the sum of bromoform, bromomethane (methyl bromide), and chloromethane (methyl chloride).</p> <p>The Los Angeles Water Board grouped the remaining pollutants in the Ocean Plan that have the same semiannual monitoring frequency into a single cell to reduce the size of tables in the Order, to improve clarity of the monitoring requirements, and to be inclusive of any changes to the pollutants listed in Table 3 of</p>	None necessary.

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		the Ocean Plan. The Discharger may refer to the Ocean Plan to identify the remaining pollutants that need to be monitored semiannually.	
18	Table E-8 of the MRP of the Order. Request that total coliform be removed from the effluent monitoring requirements. The Order includes receiving water limits for Fecal Coliform and <i>Enterococcus</i> , but not total coliform.	The Ocean Plan includes receiving water quality objectives for fecal coliform, total coliform, and <i>Enterococcus</i> . Compliance with the receiving water objectives for fecal coliform, total coliform, and <i>Enterococcus</i> is determined through receiving water monitoring conducted by the Discharger around the outfall, and therefore effluent monitoring for fecal coliform, total coliform, and <i>Enterococcus</i> is not needed to assess compliance with the water quality objectives and is removed from the MRP.	Revisions have been made to Table E-8 of the MRP and Table F-14 of the Fact Sheet of the Tentative Order
19	Section 5.8.1 of the MRP of the Order. Why is there a change from 30 to 15 days from the previous permit?	The Tentative Order provides an additional 15 days (from 15 to 30 days) for the Discharger to submit a detailed TRE work plan to provide the Discharger with additional time to put the plan together, and this is consistent with the approach for NPDES permits for all POTWs/FOTWs within the region.	None necessary.
20	Table E-1 and Table E-10 of the MRP of the Order. Revise the receiving water monitoring requirements to reduce the frequency of sampling for total coliform, fecal coliform, and <i>enterococcus</i> to quarterly and reduce the sampling to a single depth (grab sampling at 0.5 meters below the surface) at four locations (one	The monitoring requirements are prescribed to protect the beneficial uses of the receiving water, regardless of whether the receiving water is currently being used for those uses. Adjustments to the beneficial uses of the receiving waters are not conducted in the	None necessary.

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	<p>shoreline location and three receiving water monitoring locations). While officially designated as a REC-1 beneficial use area, the area along the shoreline in the vicinity of the discharge pipe is not functionally used for water contact recreation or shellfish harvesting, so the risk to the public is negligible. Monitoring at a single depth at one shoreline and three offshore locations will be more than adequate to determine whether bacteriological standards for water contact and shellfish harvesting are being met around the discharge point. After 5 years of monitoring at 7 locations from three depths each, there is negligible additional benefit to justify the added expense of such robust receiving water monitoring.</p>	<p>permitting process and instead must undergo a Basin Plan amendment. Monitoring for indicator bacteria in the receiving water is required to assess compliance with the indicator bacteria receiving water limitations in the Tentative Order that are based on the objectives in the Ocean Plan. Since effluent monitoring of indicator bacteria has been removed from the Tentative Order (See response to comment 18), robust receiving water monitoring is necessary to ensure the discharge continues to comply with the permit requirements. In addition, the discharge plume moves throughout the water column, and past monitoring data for SCI WWTP confirm this because the bacteria indicator concentrations are different at different depths. For all the reasons stated above, receiving water data for indicator bacteria is required at the specified frequency and depths.</p>	
21	<p>Table E-11 of the MRP of the Order. Revise the Ammonia Nitrogen sample type to “Grab at 0.5 meters below surface.” Consistent with the requested revision for the receiving water bacteria monitoring requirements.</p>	<p>The Ocean Plan has water quality objectives for ammonia nitrogen and monitoring at representative depths is necessary to determine the impact the discharge of ammonia has on the beneficial uses. In addition, the discharge plume moves throughout the water column, and past monitoring data for SCI WWTP confirm this because the ammonia concentrations are different at different depths. Since the ammonia data is required to determine compliance with the water quality objectives and samples at</p>	None necessary.

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		different depths provide information on the discharge plume, receiving water ammonia monitoring is required at the specified depths.	
22	Section 8.2.1 of the MRP of the Order. Please allow the option to perform Transmissivity or Turbidity continuous profile monitoring. Turbidity compares better with effluent measurements and allows for an updated CTD, more easily deployed by hand.	Other monitoring devices may be added to the profiler as long as they can meet the performance specifications in Table 1 of the latest version of <i>Field Operations Manual for Marine Water Column, Benthic, and Trawl Monitoring in Southern California</i> . The Los Angeles Water Board revised the Tentative Order in MRP section 8.2.1 to allow for the measurement of turbidity in lieu of transmissivity, which is also consistent with the flexibility provided to larger dischargers in section 10.1 of the Ocean Plan.	Revisions have been made to the Tentative Order.
23	Section 8.2.2. of the MRP of the Order. Please provide clarification on when the first round of biennial monitoring is to begin. For clarification, is biennial monitoring to begin within the first year of the effective date of the permit or the second year?	This section describes monitoring conducted in compliance with ASBS requirements. The biennial monitoring required in this Order shall begin two years from the last time monitoring was conducted in compliance with Order No. R4-2018-0156. Since the last biennial ASBS monitoring was in July 2023, the next biennial ASBS monitoring shall be performed in 2025.	None necessary.
24	Table E-13, Footnote b of the MRP of the Order. Please revise the first sentence of Footnote b. to: "One sample shall be collected at each station for benthic infaunal community analysis during the month	The Los Angeles Water Board agrees it is appropriate to provide the Discharger with this additional monitoring flexibility.	Revisions have been made to the

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	of <u>June, July, or August.</u> ” To allow additional flexibility in scheduling the sampling event at the remote island.		Tentative Order.
25	Section 9.1 of the MRP of the Order. Please delay ocean outfall inspection until 2025. Please revise the first sentence of the second paragraph to: “The ocean outfall (up to Discharge Point 002) shall be inspected externally a minimum of once every other year during the month of July or August starting in 2024 <u>2025</u> . This Navy will require contracted support for this task and will need more than a few months to secure funding and award a contract.	The Los Angeles Water Board agrees to allow the Discharger to submit the first outfall inspection report in 2025 since the previous permit only required an inspection report twice per permit cycle.	Revisions have been made to section 9.1 and 10.4.6. of the Tentative Order MRP.
26	Table E-32 of the MRP of the Order. Number in section 9 is missing 9.2. Permit goes from 9.1, 9.3 to 9.4.	The Los Angeles Water Board revised the subsection numbers for section 9 of the MRP.	Revisions have been made to the Tentative Order.