State of California Regional Water Quality Control Board San Diego Region

EXECUTIVE OFFICER SUMMARY REPORT September 8, 2010

ITEM: 13

SUBJECT: NPDES Permit Modification: Waste Discharge Requirements

for U.S. Navy at Naval Base Coronado, Modification of Order No. R9-2009-0081, NPDES Permit No. CA0109185, "Steam

Condensate", "Mammal Enclosure" "Pier Boom", and

"TCDD-Equivalents" Requirements (Tentative Order No. R9-

2010-0057) (Kristin Schwall)

PURPOSE: To modify requirements for "Steam Condensate", "Mammal

Enclosure" "Pier Boom", and "TCDD-Equivalents" in Order

No. R9-2009-0081

PUBLIC NOTICE: Notices for this hearing and availability of the tentative Order

were sent by mail and e-mail on August 3, 2010, to all known interested parties for review and comments. Copies of the tentative Order have been made available for public review at the San Diego Regional Water Quality Control Board office and were posted on the San Diego Regional Board's web site on August 3, 2010. Notification of this action was also included in the agenda notice which was mailed on

August 19, 2010.

DISCUSSION: Current Receiving Water Quality Conditions

The tentative Order addresses modification of the Navy's National Pollutant Discharge Elimination System (NPDES) permit for the Steam Condensate, Mammal Enclosure, Pier Boom, and TCDD-Equivalents discharge requirements. San Diego Bay is currently listed as impaired for Polychlorinated biphenyls (PCBs) on the State Water Resources Control Board's Final 2006 Clean Water Act Section 303(d) List of Water Quality Limited Segments. Accordingly, San Diego Bay is on the list for development of a Total Maximum Daily

Load (TMDL) for PCBs.

Environmental Outcome of Tentative Order

Because these are minor modifications to the Navy's NPDES Permit, no change to the water quality conditions of San Diego Bay are anticipated as a result of this permit

action.

Background

Discharges from Naval Base Coronado (NBC) are regulated under Order No. R9-2009-0081, NPDES Permit No. CA0109185 adopted by the San Diego Water Board on June 10, 2009. Four facilities are regulated under Order R9-2009-0081 as shown in the location map in Supporting Document 1. The Discharger requested permit modifications by letters dated January 25, 2010, and March 16, 2010.

The modifications in the tentative Order include:

- Regulating the steam condensate discharges as existing discharges instead of new discharges because they began before the adoption of the State Water Board's Thermal Plan;
- 2) Regulating the Marine Mammal Enclosure Cleaning discharge under State regulations instead of Federal NPDES regulations because the enclosure doesn't meet the Federal definition of a concentrated aquatic animal production facility;
- 3) Removal of the Pier Boom Cleaning discharge because the Navy has eliminated the discharge;
- 4) Removal of effluent limitations for TCDD equivalents based on a new Reasonable Potential Analyses which shows that the effluent limitations are not necessary; and
- 5) Minor administrative changes.

To date, the San Diego Water Board has received comments from the Navy dated August 20, 2010 (Supporting Document 4). An errata to the tentative Order is included as Supporting Document 5. Copies of any additional comments received will be provided to the San Diego Water Board in the second agenda mailing.

SIGNIFICANT CHANGES: This Order modifies the Navy's NPDES Permit for Naval
Base Coronado as described above for steam condensate,
marine mammal enclosure cleaning, pier boom cleaning,
and TCDD equivalents.

COMPLIANCE RECORD: The Facility exceeded effluent limitations specified in Order No. R9-2009-0081 as follows:

| Date | Constituent | Discharge |
|-------------|----------------|------------------|
| 1/18/2010 | Acute Toxicity | Storm Water |
| 3/2&10/2010 | pН | Steam Condensate |
| 12/7/2009 | Acute Toxicity | Storm Water |

| Date | Constituent | Discharge |
|-------------|----------------------|----------------------|
| 12/9/2009 | Copper & Temperature | Diesel Cooling Water |
| 12/9/2009 | рН | Steam Condensate |
| 11/5/2009 | рH | Steam Condensate |
| 11/5/2009 | Copper | Diesel Cooling Water |
| 9/3&10/2009 | Temperature | Diesel Cooling Water |
| 9/3/2009 | рH | Steam Condensate |
| 8/25/2009 | Copper | Diesel Cooling Water |
| 7/22/2009 | Copper | Diesel Cooling Water |

These effluent limitation violations are not related to the pollutants and associated discharge requirements being addressed in the tentative Order.

LEGAL ISSUES: None

SUPPORTING DOCS: 1. Location Map

2. Tentative Order No. R9-2010-0057

3. Transmittal letter to discharger and interested parties dated August 3, 2010

4. E-mail comments from the Navy dated August 20, 2010

5. Errata Sheet for Order No. R9-2010-0057

RECOMMENDATION: Staff recommends the adoption of tentative Order No. R9-2010-0057.