Item No. 13 Doc. No. 4 September 8, 2010

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Date:	8/20/2010 1:13 PM
Subject:	NBC Order 2010-0057 Permit Revision Comments

Hi Kristin,

To follow up on my earlier phone call, I did call the point of contact at the Marine Mammal Enclosure to confirm that my comments to you were accurate. In addition to my previous comments: i.e. a) there are no sea lions at NAB; and b) heated potable water is not used to clean the bird guano from the decks (only cold potable water); further clarification on the amounts and frequency of cleaning were obtained. I was informed that deck areas and decks leading up to and around the enclosure are cleaned only twice weekly maximum for a combined total of approximately 2 hours which equals approximately 4 hours per week. They use a high pressure sprayer (2.6gpm) to spot wash the bird guano. As it is not a continuous spray, it is hard to calculate, however, it is significantly less water than is estimated in the current permit revision. If the calculation was based on continuous, 240 minutes at 2.6 gpm would only be 624 gallons per week, therefore, it is even much less than that.

Due to the fact that the dolphins, when they are at NAB, spend most of their time in the open ocean, the netting in the pens are only cleaned as needed or approximately twice per year. According to my POC, they have not been cleaned for a number of months, so I have no estimate on the total discharge. However, it is far less than the 15,000 gallon-per-day estimate currently listed in the permit revision.

I hope this helps to clarify your write-up in the revision. If you have any questions, I am always accessible by cell or you can call Brian Gordon at 619-532-2273.

Thanks,

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