

California Regional Water Quality Control Board, San Diego Region

July 3, 2013

Mr. Sandor Halvax
Manager – Environmental Programs (West)
BAE Systems San Diego Ship Repair
PO Box 13308
San Diego, CA 92170-3308
sandor.halvax@baesystems.com

In reply refer to:
Place ID: 257991: KSchwall

Subject: Review of Self-Monitoring Reports for Order No. R9-2009-0080, NPDES No. CA0109151, BAE Systems San Diego Ship Repair

Mr. Halvax:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has completed review of the January 2011 – April 2013 monthly, quarterly, and semiannual reports and the July 2010 – June 2012 annual reports for the subject facility. Please note the following violations on the reports received:

A. Reporting Violations:

<u>No.</u>	<u>Violation ID</u>	<u>Date Occurred</u>	<u>Violation Description</u>
1	950246	8/1/2011	June 2011, Second Quarter 2011, and First Semiannual Reports were late. Due July 30. Received August 1.
2	950247	4/2/2012	February 2012 Report was late. Due March 30. Received April 2.
3	950248	8/31/2012	July 2012 Report was late. Due August 30. Received August 31.

B. Effluent Violations:

<u>No.</u>	<u>Violation ID</u>	<u>Date Occurred</u>	<u>Violation Description</u>
1	926300	4/13/2012	Copper, Total Recoverable Monthly Average limit is 2.88 ug/L and reported value was 279 ug/L at FP-003.
2	930363	4/13/2012	Copper, Total Recoverable Daily Maximum limit is 5.78 ug/L and reported value was 279 ug/L at FP-003.
3	949614	2/28/2013	Acute Toxicity Instantaneous Maximum limit is 0 Pass/Fail (Pass = 0, Fail = 1) and reported value was 1 Pass/Fail (Pass = 0, Fail = 1).

TOMAS MORALES, CHAIR | DAVID GIBSON, EXECUTIVE OFFICER

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<u>No.</u>	<u>Violation ID</u>	<u>Date Occurred</u>	<u>Violation Description</u>
4	949615	2/28/2013	Chronic Toxicity 1-Hour Average (Mean) limit is 1 TUc and reported value was 4 TUc.

C. Monitoring Violations:

<u>No.</u>	<u>Violation ID</u>	<u>Date Occurred</u>	<u>Violation Description</u>
1	950227	12/21/2010	Did not sample storm water for arsenic, mercury, and silver.
2	950228	3/25/2011	Did not sample storm water for arsenic, mercury, and silver.
3	918780	9/8/2011	Fire Protection Water was not sampled because a power outage throughout the Southern California area on September 8, 2011 required the use of fire pumps during that outage. It was not safe to collect samples at that time.
4	950229	12/12/2011	Did not sample storm water for arsenic, mercury, silver, and TOC.
5	942711	12/18/2012	Analytical data for copper was not reported due to an error on the Chain of Custody.

D. Unauthorized Discharges:

<u>No.</u>	<u>Violation ID</u>	<u>Date Occurred</u>	<u>Violation Description</u>
1	950230	7/29/2010	2 ounces of paint chips to San Diego Bay.
2	950231	7/30/2010	1 quart of paint to San Diego Bay.
3	950232	8/10/2010	100 gallons of salt water to San Diego Bay.
4	950233	8/16/2010	8 ounces of hydraulic fluid to San Diego Bay.
5	950234	9/5/2010	0.5 gallons of Simple Green cleaner to San Diego Bay.
6	950235	9/10/2010	50 gallons of CHT water to San Diego Bay.
7	950237	9/11/2010	20 gallons of salt water to San Diego Bay.
8	950238	10/4/2010	10 gallons of potable water to San Diego Bay.
9	950239	10/6/2010	200 gallons of potable water to San Diego Bay.
10	950240	11/20/2010	1 gallon of hydraulic fluid to San Diego Bay.
11	950241	2/12/2011	250 gallons of salt water to San Diego Bay.
12	950243	2/18/2011	1250 gallons of salt water to San Diego Bay.
13	950244	4/11/2011	60 gallons of salt water to San Diego Bay.
14	949982	8/23/2011	1 pint of oil discharged to San Diego Bay. Oil dripping from outboard.

<u>No.</u>	<u>Violation ID</u>	<u>Date Occurred</u>	<u>Violation Description</u>
15	949984	10/18/2011	3 gallons of transformer oil discharged to San Diego Bay. Transformer was leaking onto pier.
16	950214	10/25/2011	Hydraulic oil spill in stem gate machinery room on the USS Green Bay. Spill was not detected immediately and pooled up along a berm. The oil leaked out a hole in the berm into San Diego Bay.
17	950215	11/15/2011	Ship's force was grinding paint chips and they were released into the bay.
18	950216	12/27/2011	Ship's force was witnessed sweeping debris into San Diego Bay.
19	950217	2/16/2012	Dust generated by the deck grinding and hydro-blasting operation that Surface Technologies was performing.
20	950218	3/15/2012	The Ship's force on board USS Preble burped several gallons of sea water from recently cleaned compensation tanks into San Diego Bay.
21	925221	3/18/2012	BAE spilled 4,000 gallons of diesel from the #5 starboard ballast tank on the Pride of San Diego (POSD) dry dock. POSD waste water tank breach allowed seepage of comp water to enter #5 starboard ballast tank. When POSD super-deballasted, discharge of this fuel water was released.
22	950219	4/3/2012	A small portion of absorbent boom used during 3/18 response was not removed from San Diego Bay.
23	950220	4/18/2012	Sheen believed to be residual from 3/18/12 release.
24	950222	4/27/2012	100 gallons of sewage to San Diego Bay. The CHT system valve/hose used in support of the USS Green Bay was found opened and discharging into San Diego Bay
25	950224	5/2/2012	SBSB was removing ventilation ducting from the flight deck of the USS Green Bay and discharged less than an ounce of abrasive blast into San Diego Bay.
26	950225	6/22/2012	30 gallons of rinse water to San Diego Bay. The containment on the antenna from the USS Chief was breeched and rinse water from Cal Marine's pressure washing activities entered the deck drains
27	950226	6/29/2012	10 gallons of sewage to San Diego Bay when a CHT pipeline ruptured.
28	949549	9/1/2012	Less than a pint of unknown substance to San Diego Bay.
29	938583	9/4/2012	A fire hose on Pier 3 South ruptured discharging approximately 60 gallons of salt water into San Diego Bay. Conditions were unsafe, and thus no sample was taken.
30	949548	9/4/2012	60 gallons of salt water discharged to San Diego Bay. Fire hose servicing the USS C"ville ruptured and discharged salt water into San Diego Bay.
31	949546	9/17/2012	30-40 gallons C-marker dye discharged to San Diego Bay. Ship's force was testing the chill water loop system, a rupture in the cooler/fan coil resulted in C-marker dye leaking out of the self-containing system.

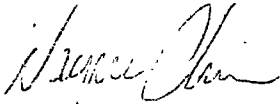
<u>No.</u>	<u>Violation ID</u>	<u>Date Occurred</u>	<u>Violation Description</u>
32	949547	9/17/2012	1 gallon of petroleum discharged to San Diego Bay.
33	949545	9/21/2012	100 Gallons of CHT discharged to San Diego Bay. CHT release valve had a blockage that caused the system to backup, causing spilling into the space and adjoining passageway.
34	949612	11/9/2012	2 gallons of potable water was spilled on 11/9/12, 1 gallon of mop water was dumped on 11/7/12, 1 gallon of salt water was leaked on 10/29/12, and 6 pieces of lagging blew into San Diego Bay on 10/20/12 and were recovered.
35	941141	11/25/2012	A rainbow sheen appeared to have originated from underneath the POSD wharf. Chain falls were being stored on the POSD wharf from the undocking of a vessel earlier that day. Underneath the chain falls was an oil stain on the concrete. The day of the incident, nothing was dripping from the chain falls and entering San Diego Bay, but after an investigation the U.S. Coast Guard determined that the chain falls and subsequent stain were the cause of the sheen.
36	942527	12/17/2012	Approximately 50 gallons of sewage originating from the USS John Paul Jones living barge and Building 13 was released into San Diego Bay from a ruptured pipe underneath the Pier 3 quay wall / lunch area. The release also contained approximately 1 quart of an oily substance that produced a faint rainbow sheen. The pipe ruptured at approximately 0740, however the rainbow sheen was not observed until 0805.
37	944308	1/18/2013	Discharge of abrasive blasting grit due into San Diego Bay to erosion of containment.
38	944307	1/21/2013	Discharge of small amount of abrasive blast grit into San Diego Bay during deconstruction of secondary containment.
39	945766	2/1/2013	A fire hose was disconnected from Pier 1, discharging approximately 25 gallons of salt water into San Diego Bay.
40	945765	2/4/2013	A potable water hose was disconnected from Pier 1, discharging approximately 15 gallons of potable water into San Diego Bay.
41	945764	2/28/2013	A leak was discovered from a fire hose on Pier 1 dripping into San Diego Bay at a rate of one gallon per minute.
42	947118	3/29/2013	A rental air compressor had a failed gasket in the fuel filter, which caused diesel fuel to begin to leak into the compressor's secondary containment. The turbulence from the compressor fan dispersed the fuel from the secondary containment, causing it to become airborne. The fuel was sprayed onto the wharf and into San Diego Bay.

Pursuant to the California Water Code (CWC) section 13385(h), violation nos. B.1 and B.2 noted above are subject to a mandatory minimum penalty of \$3,000 for each violation. The San Diego Water Board will issue that enforcement action under separate cover.

Please take steps to ensure that the violations noted above does not occur in the future. Pursuant to the CWC, the violation noted above is subject to additional enforcement action(s) by the San Diego Water Board including issuance of a time schedule order, cease and desist order, cleanup and abatement order, imposition of administrative civil liability, referral to the district attorney for criminal prosecution, or referral to the attorney general. Administrative civil liability amounts that may be imposed by the San Diego Water Board under authority of CWC Section 13350 include up to \$10,000 per day, or up to \$10 per gallon for each gallon of waste discharged.

In the subject line of any response, please include the reference number "Place ID: 257991: KSchwall". For questions or comments, please contact Kristin Schwall by phone at 858-467-2345, or by email kschwall@waterboards.ca.gov.

Respectfully,



Wayne Chiu, P.E.
Acting Senior Water Resource Control Engineer

WC:ks

Tech Staff Info & Use	
Order No.	R9-2009-0080
WDID	9 000000137
NPDES No.	CA0109151
Reg. Measure ID	370013
Place ID	257991
Enforcement ID	386340
Violation(s) ID	See above