Message

From: Stuber, Robyn [Stuber.Robyn@epa.gov]
Sent: 9/8/2018 1:14:22 AM
To: Morris, Cris@Waterboards [Cris.Morris@waterboards.ca.gov]; Fordyce, Jennifer@Waterboards [Jennifer.Fordyce@waterboards.ca.gov]; Froelich, Sophie@Waterboards [Sophie.Froelich@Waterboards.ca.gov]; Coupe, David@Waterboards [David.Coupe@waterboards.ca.gov]
CC: Purdy, Renee@Waterboards [Renee.Purdy@waterboards.ca.gov]; Lim, Jeong-Hee@Waterboards [Jeong-Hee.Lim@waterboards.ca.gov]; Webb, Steven J.@Waterboards [Steven.Webb@Waterboards.ca.gov]; Smith, DavidW [Smith.DavidW@epa.gov]
Subject: RE: Staff working Draft SCI WWTP

Yes, thanks. I'll send my comments by next Friday.

From: Morris, Cris@Waterboards [mailto:Cris.Morris@waterboards.ca.gov]
Sent: Friday, September 07, 2018 2:16 PM
To: Fordyce, Jennifer@Waterboards <Jennifer.Fordyce@waterboards.ca.gov>; Froelich, Sophie@Waterboards <Sophie.Froelich@Waterboards.ca.gov>; Coupe, David@Waterboards <David.Coupe@waterboards.ca.gov>; Stuber, Robyn <Stuber.Robyn@epa.gov>
Cc: Purdy, Renee@Waterboards <Renee.Purdy@waterboards.ca.gov>; Lim, Jeong-Hee@Waterboards <Jeong-Hee.Lim@waterboards.ca.gov>; Webb, Steven J.@Waterboards <Steven.Webb@Waterboards.ca.gov>
Subject: Staff working Draft SCI WWTP

Attached is the current Staff Working Draft and the Limit Comparison Table of the San Clemente Island Wastewater Treatment Plant (SCI WWTP) and some reference documents. SCI WWTP is a Federally-Owned Treatment Works operated by the United States Navy (refer to the 03-29-07 letter). One of the attached documents is the State Board Resolution concerning the ASBS Exclusion Zone. Since we don't need to make any changes to the resolution, the existing one is still in place. One factor in the ASBS is that they are limited by how much they discharge. The Navy has resolved that issue by adding a new tertiary treatment train to treat some amount of their wastes and recycling all of that flow.

The major changes in this Order are listed below.

1. TST implementation and chronic toxicity final effluent limitation.
2. Includes temperature and percent removal in the final effluent limitations table instead of having narrative limits.
3. New final effluent limitations for copper, zinc, and TCDD equivalents based on reasonable potential.
4. When referring to this facility, references to POTW changed to FOTW since this facility is not a POTW.
5. Revised influent/effluent monitoring requirements so that samples for non-conservative pollutants are collected as grab samples and not 24-hour composites. Previous permit required almost all pollutants to be monitored by 24-hour composites.
6. More sensitive test method required for mercury due to Sufficiently Sensitive Methods Rule.
7. Included requirement to conduct a dilution study using the receiving water data collected during the last permit cycle since the current dilution study was conducted using data that may not be representative of the conditions around the island.
8. Included discussion on bacteria monitoring and compliance with receiving water standards.
9. Revised receiving water requirements to identify the requirements recommended by the State Water Board in their letter approving the dilution study (see attached SWRCB SCI Minimum Dilution Ratio).
10. The current NPDES permit for this facility includes an attachment: Sewer System Reporting Requirements, instead of the facility being covered under the State Water Resources Control Board Order No. 2006-0003-DWQ. POTWs are required to enroll in the SSO WDR, along with federal agencies. The Navy contends that the SSO WDR does not apply to them because it treats private entities different than federal agencies.

To keep this permit on the November Board Meeting agenda, we need your comments back by **COB next Friday, September 14th.** I know that is not much time, especially considering that it is Board meeting week, but I am hoping that Jennifer or Sophie can find the time to review this short permit. Steven incorporated a bunch of comments to show the changes to the permit, so I am hoping it won't take long. Please let me know if you have any questions.

Thanks so much,

Cris