



27201 Puerta Real, Suite 350
Mission Viejo, California 92691
Phone 949.347.2780

Via email and FedEx

September 24, 2013

David W. Gibson, Executive Officer
San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, California 92123-4353

Re: Transmittal of the City of San Diego Industrial User Discharge Permit (Industry No. 11-0563) for the San Diego Shipyard Sediment Site – South Shipyard

Dear Mr. Gibson:

Submitted in compliance with Section T, Provision 7 of the Regional Water Quality Control Board's (Water Board's) Waste Discharge Requirements and Section 401 Water Quality Certification (Order No. R9-2013-0093), this letter provides the City of San Diego Industrial User Discharge Permit (Industry No. 11-0563) to the Water Board on behalf of the San Diego Bay Environmental Restoration Fund South (South Trust) and National Steel and Shipbuilding Company (NASSCO) for the San Diego Shipyard Sediment Site. A copy of this letter has also been uploaded to Geotracker. Should there be any questions regarding this letter, please do not hesitate to contact me at (619) 992-1440 or at dtempleton@anchorqea.com.

Sincerely,

A handwritten signature in black ink that reads "David Templeton".

David Templeton
Senior Partner
Anchor QEA, L.P.

cc: Mike Chee, NASSCO
Mike Palmer, San Diego Bay Environmental Restoration Fund – South Trust



THE CITY OF SAN DIEGO

September 17, 2013

San Diego Bay Environmental Restoration Fund - South Trust
c/o NASSCO, MS 22A
2798 Harbor Drive
San Diego, CA 92113

Attention: Michael Palmer

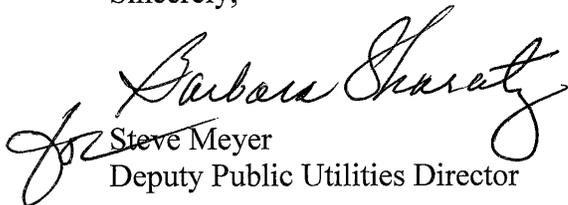
Subject: Industrial User Discharge Permit
Industry Number 11-0563

The attached Industrial User Discharge Permit has been prepared on the basis of information supplied on your permit application and obtained during the investigation of your industry by Industrial Wastewater Control Program personnel. The permit is valid as long as all stipulated conditions are complied with and is subject to renewal and change as stated in the City of San Diego Municipal Code.

If for any reason you disagree with any conditions set forth in the attached permit, written notification must be submitted to the Industrial Wastewater Control Program within 10 working days from the date of receipt of this letter. The letter shall contain details and facts supporting your disagreement with the permit conditions.

If you have questions pertaining to the permit conditions or any information set forth in this letter, please contact the Wastewater Control office at (858) 654-4100.

Sincerely,


Steve Meyer
Deputy Public Utilities Director

RRC:drn

Enclosure: Permit

Industrial Wastewater Control Program • Metropolitan Wastewater

9192 Topaz Way • San Diego, CA 92123-1119

Tel (858) 654-4100 Fax (858) 654-4110



DIVERSITY
BRINGS US ALL TOGETHER



INDUSTRIAL USER DISCHARGE PERMIT

Permit Number: 11-0563-01-A

Permit Category: 2

Effective Date: September 17, 2013

Expiration Date: September 1, 2017

Permittee: San Diego Bay Environmental Restoration Fund - South Trust
c/o NASSCO, MS 22A
2798 Harbor Drive
San Diego, CA 92113

Attention: Michael Palmer

For the Facility: 2798 Harbor Drive
San Diego, CA 92113

Pursuant to Federal, State, and Local regulations, the permittee is hereby authorized to discharge an annual average of **288,000 gallons per calendar day of process wastewater from dredging sediment dewatering and truck washing into the Metropolitan Sewer System not to exceed 250 gallons per minute** from this facility.

The discharge is subject to conditions set forth in the following sections of this permit:

- (1) Standard Conditions: See pages 3-7 for Standard Permit Conditions.
- (2) Specific Conditions: This permit requires that specific actions be taken by the permittee. See Specific Conditions established on Attachment A, page 2.
- (3) Attachment A: Discharge Standards for Connection(s) 100.
- (4) Attachment B: Self-Monitoring and Reporting Requirements for Connection(s) 100.
- (5) Attachment F: Fact Sheet describing facility operations and wastewater controls.
- (6) Appendix A: Permit Definitions.
- (7) Appendix B: Instructions for Completing Self-Monitoring Forms.
- (8) Initial Self-Monitoring Form and Self-Monitoring Certification
- (9) Resource Conservation and Recovery Act (RCRA) Information.

Failure on the part of the industrial user to fulfill any of the specified conditions shall be sufficient cause for immediate revocation of this permit. Any assignment or transfer of this permit shall automatically make it void.

This permit may be modified by the Industrial Wastewater Control Program, as required or authorized by City codes, or as required by the Federal Government or agencies thereof. This permit is further subject to termination upon thirty (30) days written notice to the industrial user by an authorized representative of the Industrial Wastewater Control Program.

If a completed renewal application is received by the Industrial Wastewater Control Program a minimum of forty-five days before the expiration date, this permit will remain in force until a new permit is issued or the permittee is notified of nonrenewal.

Issued on: *September 17, 2013*

By: INDUSTRIAL WASTEWATER
CONTROL PROGRAM
9192 Topaz Way
San Diego, California 92123-1119

Barbara Sharatz
Barbara Sharatz, Program Manager

STANDARD CONDITIONS**A. Duty to Comply with Municipal Code**

The industrial user shall comply with applicable provisions of the Municipal Code pertaining to the sewer department and to the discharge of industrial wastes to the sewerage system.

B. Duty to Provide Access

The industrial user shall, upon the presentation of a valid Metropolitan Wastewater Department I.D., allow Industrial Wastewater Control Program (IWCP) personnel to enter the premises for inspection or sampling related to conditions of this permit.

C. Duty to Comply

The permittee must comply with all discharge limits, requirements, and conditions of this permit. Failure to comply may be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatements.

D. Slug Discharge Report (40 CFR 403.12(f))

The industrial user shall notify the IWCP immediately in the event of any accidental spill, non-customary batch discharge, or other slug discharge to the public sewerage system in violation of discharge prohibitions or standards. Immediate notification shall be made by contacting the IWCP Compliance Supervisor, Program Manager, or Permit Supervisor at (858) 654-4100 from 8:00 a.m. to 5:00 p.m. Monday through Friday, or (619) 527-7660 at all other times, and submitting a written report within five calendar days to:

**Industrial Wastewater Control Program
9192 Topaz Way
San Diego, CA 92123-1119**

This report must detail the nature, volume, time, and duration of the discharge, the steps taken to control/mitigate its effects on the sewer system, and the measures which have been and/or will be implemented to prevent similar discharges in the future. The permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under Local, State, or Federal laws.

E. Changes at Facility Affecting Potential for Slug Discharge (40 CFR 403.8(f)(2)(vi))

Notify the Industrial Wastewater Control Program immediately of any changes at the facility affecting the potential for a Slug Discharge including, but not limited to, the installation of an automatic feed treatment system using chemicals stored in volumes greater than 55 gallons.

F. Bypass Provisions (see 40 CFR 403.17 for complete provisions)

(1) The industrial user may allow any bypass (See Appendix A: Definitions) to occur which does not cause Pretreatment Standards or Requirements to be violated, but only if it is for essential maintenance to assure efficient operation. These bypasses are not subject to the reporting requirements and prohibitions set forth in F(2) and F(3) below.

(2) If the industrial user knows in advance of the need for a bypass of a wastewater treatment system that will result in noncompliance with Pretreatment Standards or Requirements, it shall submit prior notice to the IWCP, if possible at least ten calendar days before the date of the bypass, at the address in D, above.

The industrial user shall notify the IWCP of an unanticipated bypass that exceeds applicable Pretreatment Standards within 24 hours from the time the industrial user becomes aware of the bypass, and a written submission shall also be provided within five calendar days. The written submission shall be sent to the address in D, above, and must

contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass.

(3) Bypass is prohibited, and may result in enforcement actions unless the following three conditions are true:

(i) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(ii) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and

(iii) The Industrial User submitted notices as required under Section F(2).

G. Upset Reporting Requirement (see 40 CFR 403.16 for complete Upset Provisions)

The industrial user shall notify the IWCP within 24 hours of becoming aware of an upset (see Appendix A: Definitions) that results in noncompliance with categorical Pretreatment Standards, and a written submission must be provided within five calendar days. The written submission shall be sent to the address listed in D, above, and must contain a description of the discharge and cause of noncompliance, the period of noncompliance, including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken and/or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

H. 40 CFR Part 261 Waste Reporting Requirement (40 CFR 403.12 (p)(1))

The industrial user shall notify the IWCP, the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261. The report must include the name of the hazardous waste as set forth in 40 CFR part 261, the EPA hazardous waste number, and the type of discharge (continuous, batch, or other). See the full CFR text for additional reporting requirements for discharges of more than 100 kilograms of such waste per calendar month to the POTW. The notification requirement in this section does not apply to pollutants already reported under the self-monitoring requirements of 40 CFR 403.12 (b), (d), and (e).

I. Signatory Requirements (40 CFR 403.12(l))

All applications and reports submitted to the Industrial Wastewater Control Program must contain the following certification statement and be signed as required in Sections (a), (b), (c), or (d) below:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

- a) By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:
- (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or;
 - (ii) the manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions which govern the operation of the regulated facility, including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- b) By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship, respectively.
- c) The principal executive officer or director having responsibility for the overall operation of the discharging facility if the Industrial User submitting the reports is a Federal, State, or Local governmental entity, or their agents.
- d) By a duly authorized representative of the individual designated in paragraph (a), (b), or (c) of this section if:
- (i) the authorization is made in writing by the individual described in paragraph (a), (b), or (c);
 - (ii) the authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the Industrial Discharge originates, such as the position of plant manager, operator of a well, or a well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and
 - (iii) the written authorization is submitted to the City.

J. Planned Changes (40 CFR 403.12 (j))

The permittee shall give written notice to the Industrial Wastewater Control Program 90 days prior to any facility expansion, production increase, or process modification which results in new discharges or a change in the volume or character of pollutants in the discharge or an increase of more than fifteen percent (15%) in the average daily process wastewater discharge volume. The permittee shall also give written notice to the Industrial Wastewater Control Program 30 days prior to any modification to the pretreatment system documented in the current Attachment F Fact Sheet.

K. Continuation of Expired Permits

An expired permit will continue to be effective and enforceable until the permit is reissued if:

- a) The permittee has submitted a complete permit application at least forty-five (45) days prior to the expiration date of the user's existing permit.
- b) The failure to reissue the permit, prior to expiration of the previous permit, is not due to any act or failure to act on the part of the permittee.

L. Retention of Records (40 CFR 403.12 (o)(2))

- a) The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, report or application. This period may be extended by request of the IWCP at any time.
- b) All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the IWCP shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

M. Permit Modification

This permit may be modified for good causes including, but not limited to, the following:

- a) To incorporate any new or revised Federal, State, or Local pretreatment standards or requirements;
- b) Material or substantial alterations or additions to the discharger's operation processes, or discharge volume or character which were not considered in drafting the effective permit;
- c) A change in any condition in either the industrial user or the Publicly Owned Treatment Works (POTW) that requires either a temporary or permanent reduction or elimination of the authorized discharge;
- d) Information indicating that the permitted discharge poses a threat to the Control Authority's collection and treatment systems, POTW personnel or the receiving waters;
- e) Violation of any terms or conditions of the permit;
- f) Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
- g) To correct typographical or other errors in the permit;
- h) To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- i) Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

N. Civil and Criminal Penalties

Any person who violates any permit condition, or who discharges wastewater which causes pollution, or who violates any cease and desist order, prohibition, effluent limitation or national pretreatment standard shall be liable civilly for a penalty not to exceed \$2,500 per day per violation. Additionally, any person intentionally causing such violations shall be liable, upon conviction, for a sum not to exceed \$25,000 per day per violation, or for imprisonment for not more than one year, or both.

O. Compliance with Applicable Pretreatment Standards and Requirements

Compliance with this permit does not relieve the permittee from its obligations regarding compliance with any and all applicable Local, State and Federal pretreatment standards and requirements including any such standards or requirements that may become effective during the term of this permit.

P. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

Q. Non-transferability

Industrial Discharge Permits are issued only for specific use for a specific operation. Any sale, lease, transfer, or assignment of the premises or operation for which the permit was issued shall require a new permit to be issued. Any new or changed conditions of operation shall require a new permit to be issued.

ATTACHMENT A
DISCHARGE STANDARDS

- A. **GENERAL PROHIBITION** (from 40 CFR 403): A User may not introduce into a POTW any pollutant(s) which cause Pass Through or Interference. These general prohibitions and the specific prohibitions in "D" below apply to each User introducing pollutants into a POTW whether or not the User is subject to other National Pretreatment Standards or any National, State, or Local Pretreatment Requirements.
- B. **PROHIBITION AGAINST DILUTION**: No Industrial User shall ever increase the use of process water, or in any other way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with a Pretreatment Standard or Requirement.
- C. **PROHIBITION AGAINST BYPASS**: Bypass of wastewater pretreatment is prohibited, and the IWCP may take enforcement action against an industrial user for a bypass, unless the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; there were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime; and the industrial user submitted notices in compliance with the Standard Conditions of this permit.
- D. **SPECIFIC PROHIBITIONS**: In addition, it is unlawful for a User to introduce the following discharges into the Metropolitan Sewerage System:
1. **Flammable or Explosive Substances**: Any pollutant which creates a fire or explosion hazard in the Publicly Owned Treatment Works, including but not limited to, wastestreams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Celsius using the test methods specified in 40 C.F.R. § 261.21;
 2. **Toxic and Poisonous Substances**: Any matter containing toxic or poisonous solids, liquids, or gases in such quantities that, alone or in combination with other substances, cause acute health and safety problems for humans, animals, or the local environment;
 3. **Corrosives**: Any matter which will cause corrosive structural damage to structures, equipment, or other physical facilities of the wastewater system, but in no case discharges with pH lower than 5.0, unless a specific variance is granted;
 4. **Substances which may obstruct flow**: Any solid or viscous substance or other matter of such quality, size, or quantity that it may cause obstruction to flow in the sewer or be detrimental to proper wastewater treatment plant operations;
 5. **Interference**: Any pollutant, including oxygen demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW;
 6. **Uncontaminated Water**: Any rainwater, storm water, groundwater, street drainage, subsurface drainage, roof drainage, yard drainage, water from yard fountains, ponds or lawn sprays, or any other uncontaminated water;
 7. **Heat**: Any matter having a temperature higher than 150 degrees Fahrenheit (65.5 degrees Celsius), or at a temperature which causes the influent to the waste treatment plant to exceed 104 degrees Fahrenheit (40 degrees Celsius);
 8. **Animal/Vegetable Fats, Oils, and Greases**: Fats, oils, and greases of animal or vegetable origin in a concentration that exceeds 500 mg/L.

9. **Odor:** Any strongly odorous matter or matter tending to create odors;
 10. **Dissolved Sulfides:** Any matter containing over 1.0 mg/l of dissolved sulfides;
 11. **High pH:** Any matter with a pH equal to or greater than 12.5 standard units;
 12. **Toxic Fumes:** Any matter which results in the presence of toxic gases, vapors, or fumes within the wastewater conveyance or treatment system in a quantity that may cause acute worker health and safety problems;
 13. **Infectious Wastes:** Any matter requiring an excessive quantity of chlorine or other chemical compound used for disinfection purposes;
 14. **Uncontaminated Process Water:** Any excessive amounts of deionized water, steam condensate, distilled water, or single pass cooling water;
 15. **Trucked Pollutants:** Any trucked or hauled pollutants, except at discharge points designated by the IWCP;
 16. **Radioactivity:** Any radioactive matter, except:
 - (A) When the person is authorized to use radioactive materials by the State Department of Health or other governmental agency empowered to regulate the use of radioactive materials, and
 - (B) When the matter is discharged in strict conformity with current California Radiation Control Regulations (California Administrative Code, Title 17, section 30253), federal regulations (10 C.F.R. § 20.2003 and Table 3 of Appendix B to §§ 20.1001 – 20.2401), and the Nuclear Regulatory Commission regulations and recommendations for safe disposal;
 17. **Color:** Any matter producing excessive discoloration of the wastewater treatment plant effluent;
 18. **Hazardous Wastes:** Hazardous wastes, as defined in California Administrative Code, Title 22, Section 66261.3, unless limited to that concentration which complies with all local, state, and federal discharge limitations, and which does not interfere with the operation of the wastewater facilities;
 19. **Petroleum/Mineral Oils:** Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;
 20. **Pretreatment Sludges:** Sludges or deposited solids resulting from an industrial or pretreatment process.
- E. **SPECIFIC LIMITATIONS:** At each connection, limits for the listed pollutants are applicable to the contributing wastestream(s) and will be enforced at the described sample point.

F. SPECIFIC CONDITIONS:

1. Each discharge line to sewer must include an operational totalizing flow meter that accurately measures flow. To ensure accurate flow measurement, the meter(s) must be sized, installed, calibrated, and operated according to the manufacturer's specifications.
2. The Industrial User is required to limit the discharge of Industrial Wastewater to a maximum flow rate of 250 gallons per minute. When the accumulated rainfall during a single rain event reaches 0.5 inches, cease discharge until 24-hours after the end of the most recent rain event.
3. The Industrial User shall notify the IWCP within 24 hours of making any modifications, changes or substitutions involving the totalizing flow meter(s), including, but not limited to, replacement of the meter or modification of the meter installation and/or placement. Notification of meter replacement must include a copy of the manufacturer's specifications for the replacement meter, plus the ending meter read and removal date of the old unit and the beginning meter read and installation date of the new unit. Lack of a properly operating meter does not relieve the Industrial User of the requirement to accurately report imported flow.

CONNECTION NUMBER 100

Processes discharging through this connection include: dredging sediment dewatering and truck washing. The total flow through this connection is approximately 288,000 gpd.

In addition to the reporting required of the San Diego Bay Environmental Restoration Fund - South Trust per Attachment B, the Industrial Wastewater Control Program will periodically collect wastewater samples from the final 21,000 gallon tank of the treatment system, just before the water meter.

Characteristic or Pollutant	Units	Local Daily Maximum	Instantaneous	Federal Daily Maximum
Maximum gals/min thru meter	gpm	--	250	--
Minimum gals/min thru meter when discharging	gpm	--	50	--
Arsenic, Total	mg/L	5	--	--
Mercury, Total	mg/L	0.2	--	--
PCB's, Total	ug/L	--	--	3

ATTACHMENT B**SELF-MONITORING AND REPORTING REQUIREMENTS**

- A. **REPRESENTATIVE SAMPLING:** The industrial user shall monitor for discharges to the Metropolitan Sewerage System as described on the following pages for specific sample locations. All samples collected for the purposes of this permit shall be representative of the volume and nature of the normal discharge.
- B. **ANALYTICAL METHODS TO DEMONSTRATE CONTINUED COMPLIANCE:** All handling, preservation, and laboratory analyses of samples shall be performed in accordance with 40 CFR Part 136 and amendments thereto, unless specified otherwise in the monitoring conditions of this permit, and all analyses, with the exception of continuous monitoring, must be conducted by an ELAP certified laboratory.
- C. **RECORD CONTENTS:** The industrial user shall maintain accurate records of all monitoring activities, including: a) the date, exact location, method, and time of sampling, and the names of the person or persons taking such samples; b) the date analyses were performed; c) name of person(s) performing such analyses; d) the analytical techniques/methods used; e) the results of those analyses; and for batch discharges, f) the actual date(s) of discharge when different from the sampling date.
- D. **ADDITIONAL MONITORING BY THE PERMITTEE:** If the permittee monitors any regulated pollutant at a designated connection more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or otherwise approved by EPA or as specified in this permit, the results of such monitoring shall be submitted with the next scheduled self-monitoring report and included in the calculations to determine compliance with monthly average limitations.
- E. **AUTOMATIC RESAMPLING:** If sampling performed by an Industrial User indicates a violation, the User shall:
1. Notify the IWCP Compliance Supervisor (phone (858) 654-4100/ fax (858) 654-4110) of the violation within 24 hours of becoming aware of the violation; and,
 2. Repeat the sampling and analysis for all characteristics or pollutants required by this permit at the sample point in violation, and submit the results of to the IWCP Compliance Supervisor within 30 days of becoming aware of the violation. This requirement is in addition to routine self-monitoring and therefore the results can not be used for the next report.
- F. **REPORTING OF RESULTS:** The results of analyses shall be submitted on Industrial Self-Monitoring Report forms, which will be provided, to:

**Compliance Supervisor
Industrial Wastewater Control Program
9192 Topaz Way
San Diego, CA 92123--1119**

SELF-MONITORING AND REPORTING REQUIREMENTS, CONNECTION 100

Representative wastewater samples are to be collected from the final 21,000 gallon tank of the treatment system, just before the water meter.

Report dates:	<u>Monitoring Period</u>	<u>Report Due</u>
	Each Calendar Month	15 th of the following month
	*Jan-Mar	Apr 15th
	*Apr-Jun	Jul 15th
	*Jul-Sep	Oct 15th
	*Oct-Dec	Jan 15th

Measurements and analyses to be performed:

Characteristic or Pollutant	Units	Sample type	Frequency
Beginning Meter Read and Date	gals	Evaluation only (no sample)	Monthly
Ending Meter Read and Date	gals	Evaluation only (no sample)	Monthly
Average Flow/calendar day thru Connection	gpd	Evaluation only (no sample)	Monthly
Maximum Flow/calendar day thru Connection	gpd	Evaluation only (no sample)	Monthly
Imported Flow During Period	gals	Evaluation only (no sample)	Monthly
Maximum gals/min thru meter	gpm	Evaluation only (no sample)	Monthly
Minimum gals/min thru meter when discharging	gpm	Evaluation only (no sample)	Monthly
Chemical Oxygen Demand	mg/L	24 hour composite	Monthly
Solids, Total Suspended	mg/L	24 hour composite	Monthly
PCB's, Total	ug/L	Pesticide and PCB grab	*Quarterly
Copper, Total	mg/L	24 hour composite	*Quarterly
Lead, Total	mg/L	24 hour composite	*Quarterly
Nickel, Total	mg/L	24 hour composite	*Quarterly
Zinc, Total	mg/L	24 hour composite	*Quarterly
Arsenic, Total	mg/L	24 hour composite	*Quarterly
Mercury, Total	mg/L	24 hour composite	*Quarterly

Read Flow Meter on Last Day of Period: The Industrial User is required to read the totalizing flow meter for this discharge to sewer on the last day of each reporting period. The Industrial User is also required to report the beginning and final meter readings, the units, and the dates of the reads with each self-monitoring report.

Report Imported Flow: The Industrial User is required to report total imported flow, in gallons, discharged to this connection during the monitoring period. Subtract the meter read on the last day of the previous monitoring period from the last read of the current monitoring period, and include the resulting total volume on the self-monitoring report form, converting cubic feet to gallons if necessary.

Report Average Flow/Day: The Industrial User is required to report the average volume of wastewater discharged to this connection in gallons per calendar day.

Report Maximum Flow/Day: The Industrial User is required to report the maximum volume of wastewater discharged on a single day to this connection during the monitoring period.

Initial Self-Monitoring Report: Use the enclosed Industry Self-Monitoring Form (ISMF) and Self-Monitoring Report Certification form for wastewater discharges during the month of September 2013. The completed forms are due October 15th, 2013.

ATTACHMENT F

FACT SHEET

Industry Number: 11-0563

Industry Name: San Diego Bay Environmental Restoration Fund – South Trust

Project Address: 2798 Harbor Drive
San Diego, CA 92113

Administrative Contact: Michael Palmer, Project Coordinator

Inspector: Ryan Cross

Project Description

The San Diego Bay Environmental Restoration Fund – South Trust (South Trust) project will be dredging bay soil for hauling and remediation purposes. The dredging will primarily remove soil but will also involve a good portion of wastewater as the soil is dewatered. The dredging project will settle and decant water in the dredging barge and in the transport barge that will carry the soil and water from the dredging area to the shore. The soil will be dry enough by this point to be moved directly into awaiting trucks for offsite disposal, while the remaining water layer will be pumped into the pretreatment system.

Background research of the surrounding area indicated PCBs, Metals, Benzene, Gasoline, and Diesel potential may be present in the soil water. There have been samples taken at several areas in the dredging area and porewater samples taken to determine the potential pollutants in the water portion of the dredging project. These documents were provided on March 8, 2013 and August 15, 2013 with copies in the file folder. As these pollutants were not at levels of concern to our program, we will not require the industry to install pretreatment for these pollutants. Therefore only basic settling is required to prevent solids and sludge from entering the sewer.

Wastewater Control

The dredging activities will bring a mixture of soil and water onto a barge in the bay. The water layer will be separated on the dredging barge, a transporting barge, and then pumped to the pretreatment system at the dock. The soil will be brought to dock and hauled away by trucks directly from the barge or placed in the soil drying area to air dry before being hauled off site. The soil drying area will have no discharge. The trucks that will be hauling the soil off site will have their tires spray rinsed before heading onto the public roads. The tire wash water will also be pumped to the pretreatment system.

The pretreatment system consists of five tanks in a modular series that can be scaled up as necessary for extra storage capacity or to lengthen settling time. Each module will have one weir tank feeding three settling tanks, the settling tanks will await an unspecified time for settling to complete which will depend on the levels of sediment in each batch of water sent to the tanks. When each settling tank is ready it will be discharged into the pre-discharge tank. As all three

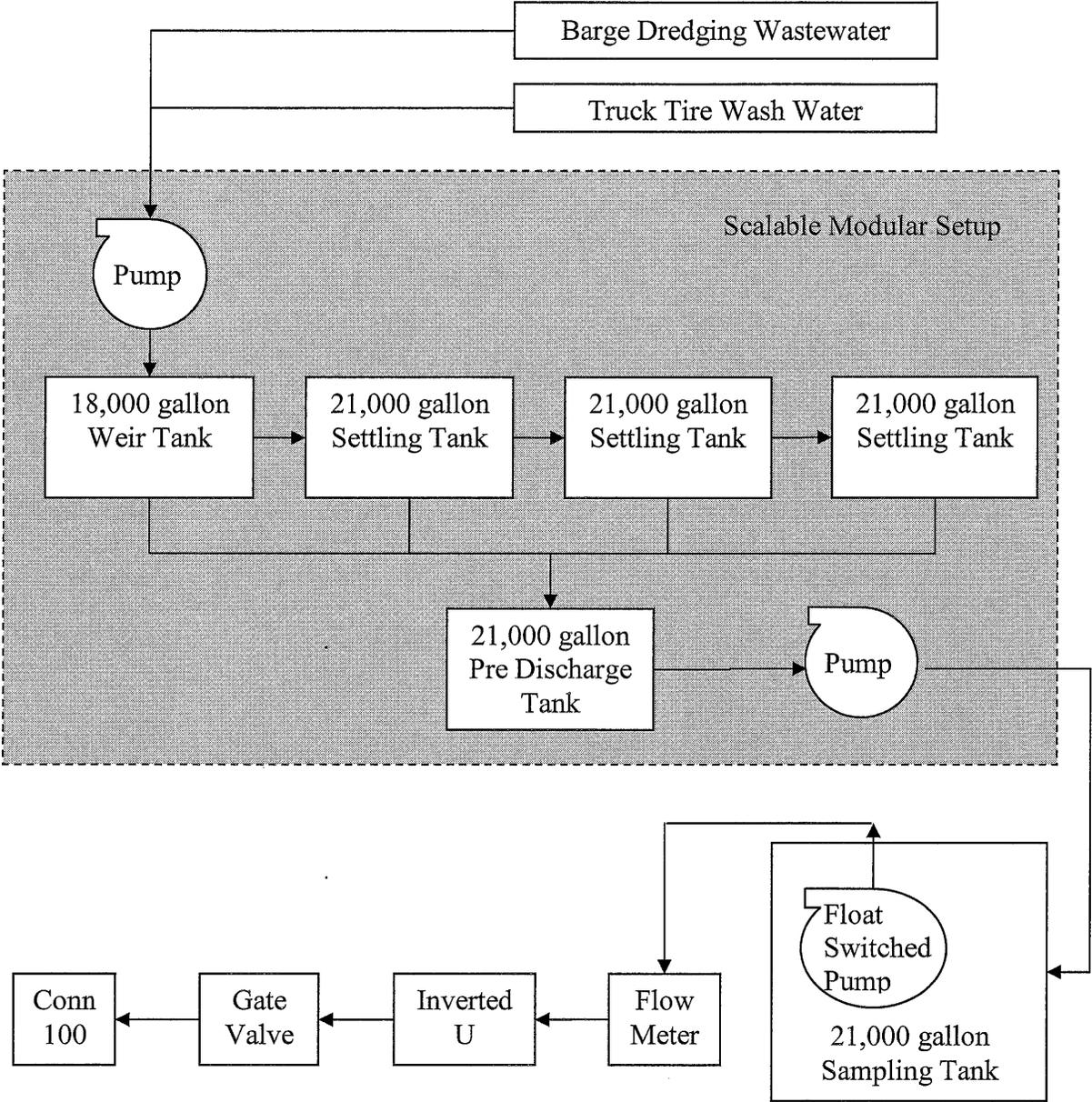
settling tanks and the weir tank are connected to a manifold combining into the pre-discharge tank, and potentially flowing at the same time, this pre-discharge tank also functions as a combining or comingling tank. These five tank module may grow if more settling time is needed, or more water layer is coming out of the dredged soil so that there may be several pre-discharge tanks. All pre-discharge tanks will connect to a single sampling tank. In this way many modules can be filled and settled but all will combine at the sampling tank before discharging to sewer. The sampling tank will use a Godwin Sub-Prime GSP35 electric submersible pump to move the wastewater out of sampling tank and to the flow meter. After the flow meter there is an inverted U for the required back pressure and to ensure there is no gravity flow or siphon effects before the wastewater is discharged to sewer at connection 100. After the inverted U is a gate valve to control the maximum flow rate before discharge to sewer at connection 100.

Metering and Flow Control

The minimum flow rate limit is determined by the minimum operating flow of 50 gpm of the McCrometer M1104 flow meter in the pretreatment system. The flow meter was installed according to manufacturer's specifications with the 20 inches of straight pipe before and 4 inches after the meter, allowing for manufacturer recommended installation. The minimum flow rate limit will be met by the Godwin Sub-Prime GSP35 electric submersible pump upstream of the flow meter capable of producing rates well above 50 gpm.

The maximum flow rate approved by our Flow Modeling Group, and set as the maximum flow rate limit, is 250 gpm during dry weather and no discharge is authorized during or for 24 hours after a rain event of $\frac{1}{2}$ an inch or more. The industry will regulate the flow with a gate valve. This will restrict the Godwin Sub-Prime GSP35 electric submersible pump they are choosing to use, from exceeding the maximum flow rate limit.

Flow Diagram



Classification by Federal Point Source Category

The South Trust is not performing any federally regulated operations at this site and the groundwater is not expected to contain free product. However, the flow exceeds 25,000 gpd, and is therefore classified as a Significant Industrial User (SIU). The discharge to sewer is subject to the City of San Diego's local limits and General and Specific Prohibitions set forth in 40 CFR 403.5.

Point of Compliance and Pretreatment Standards

The point of compliance for this project is the final 21,000 gallon tank of the treatment system, just before the water meter.

The limits below for Arsenic and Mercury are California Hazardous Waste STLCs. The limit for PCBs is the federal concentration limit for any water containing PCB discharged to a Publicly Owned Treatment Works (POTW), as set forth at 40 CFR 761.

Characteristic or Pollutant	Units	Sample type	Frequency
Beginning Meter Read and Date	gals	Evaluation only (no sample)	Monthly
Ending Meter Read and Date	gals	Evaluation only (no sample)	Monthly
Average Flow/calendar day thru Connection	gpd	Evaluation only (no sample)	Monthly
Imported Flow During Period	gals	Evaluation only (no sample)	Monthly
Maximum gals/min thru meter	gpm	Evaluation only (no sample)	Monthly
Chemical Oxygen Demand	mg/L	24 hour composite	Monthly
Solids, Total Suspended	mg/L	24 hour composite	Monthly
Copper, Total	mg/L	24 hour composite	Quarterly
Lead, Total	mg/L	24 hour composite	Quarterly
Nickel, Total	mg/L	24 hour composite	Quarterly
Zinc, Total	mg/L	24 hour composite	Quarterly
Arsenic, Total	mg/L	24 hour composite	Quarterly
Mercury, Total	mg/L	24 hour composite	Quarterly
PCB's, Total	ug/L	Pesticide and PCB grab	Quarterly

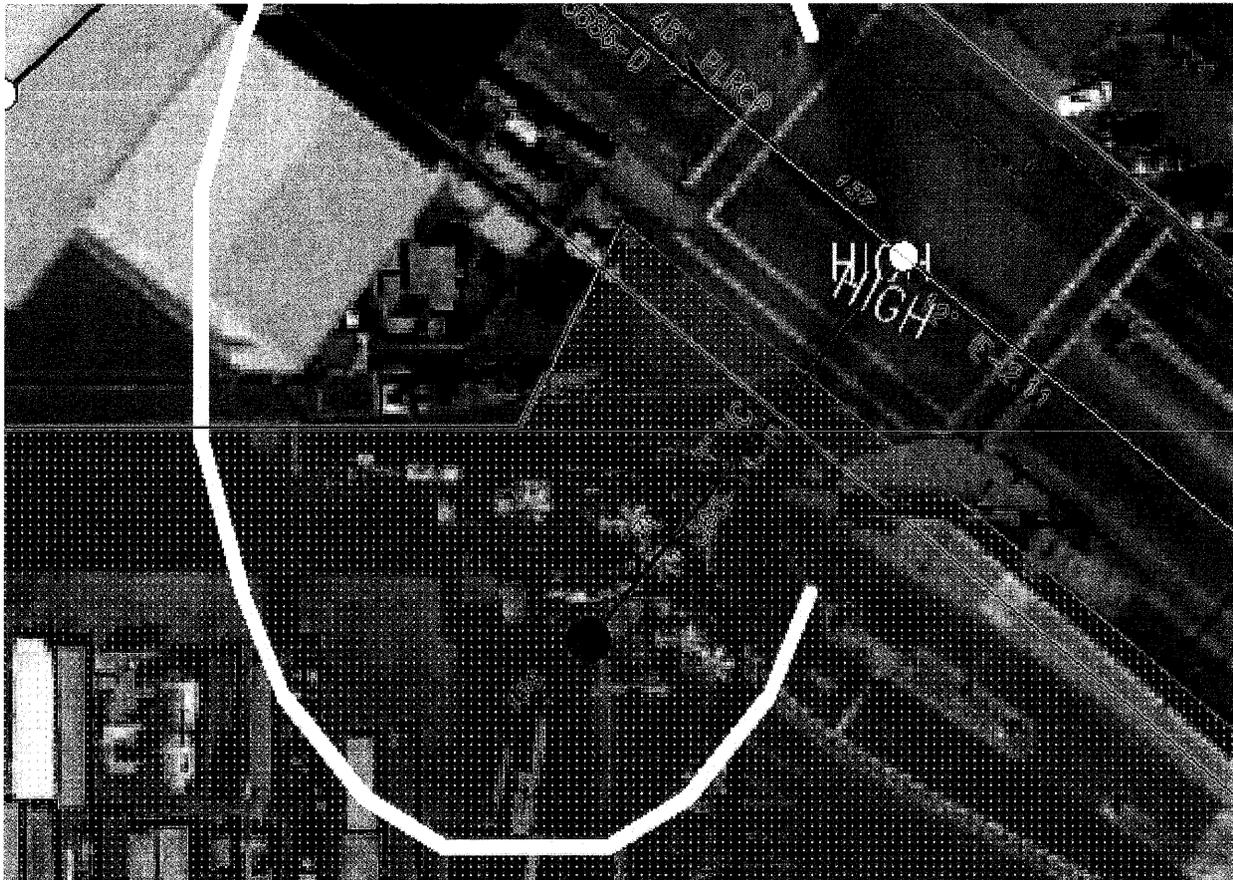
Characteristic or Pollutant	Units	Local Daily Maximum	Instantaneous	Federal Daily Maximum
Maximum gals/min thru meter	gpm	--	250	--
Minimum gals/min thru meter when discharging	gpm	--	50	--
Arsenic, Total	mg/L	5		--
Mercury, Total	mg/L	0.2		--
PCB's, Total	ug/L	--		3

Slug Discharge Control

There are no chemicals stored on-site. The dredged soil wastewater is not expected to contain any free product, or pollutants in excess of trace amounts. Flow is controlled by a gate valve. There are no open sewer drains in the area. Therefore, a Slug Discharge Prevention and Control Plan is not required at this time.

Connection 100

Connection 100 is the manhole at the northeast side of the project and labeled as H24S138 in our records. This was a lift station operated by the Navy and appears to not be in use at this time. It connects to the City of San Diego sewer main along Harbor Drive.



APPENDIX A

DEFINITIONS

1. **Bypass:** The intentional diversion of wastestreams from any portion of an industrial user's pretreatment facility.
2. **Daily Maximum:** The maximum allowable value for the arithmetic average concentration of a pollutant, calculated using all measurements taken in a 24 hour period representative of normal process operations.
3. **Dilution:** Increasing the use of process water, or otherwise attempting to decrease the concentration of pollutants in a discharge as a partial or complete substitute for adequate treatment to achieve compliance with a Pretreatment Standard or Requirement.
4. **Discharger:** Any person that discharges, or causes a discharge of, wastewater directly or indirectly to a public sewer.
5. **4-Day Average:** An independent average calculated using the analytical results from four consecutive sampling days and representing the average concentration achievable when electroplating wastewater pretreatment equipment is operated at the expected mean and variability.
6. **Grab Sample:** A sample which is collected from a wastestream over a period of less than fifteen minutes.
7. **Industrial Connection:** The sewer lateral connecting a building sewer or building waste drainage system to the public sewer for the purpose of conveying industrial wastewater.
8. **Industrial User:** Any non-domestic source regulated under section 307 (b), (c) or (d) of the Clean Water Act and discharging pollutants into a POTW.
9. **Industrial Waste:** All wastes other than domestic sewage including all wastewater from any production, manufacturing, processing, institutional, commercial, service, agricultural, or other operation.
10. **Inspector:** A person authorized by the Metropolitan Wastewater Department Director to inspect wastewater generation, conveyance, processing, and disposal facilities and to perform any required sampling.
11. **Interference:** A Discharge which, alone or in conjunction with a discharge or discharges from other sources, both:
 1. Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and,
 2. Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with applicable regulations or permits.
12. **Monthly Average Limitation:** The maximum allowable value for the average of all results obtained from samples collected during one calendar month.
13. **Pass Through:** A Discharge which exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation).
14. **POTW (Publicly Owned Treatment Works):** A treatment works which is owned by a municipality, including any devices and systems used in the storage, treatment, recycling, and reclamation of municipal sewage or industrial wastes of a liquid nature. It also includes sewers, pipes, and other conveyances if they convey wastewater to a POTW treatment plant.

APPENDIX B

Instructions for Completing Industry Self-Monitoring Forms

1. Approximately five weeks prior to the self-monitoring report due date, this office will mail an Industry Self-Monitoring Form (ISMF) for each connection to the designated contact; analyses results must be reported on this form or a similarly formatted data entry form. **The samples may be collected at any time within the monitoring period, except when the Industrial Waste Lab is already sampling at your facility; it is not necessary to wait until you receive the ISMF.** Transfer the analysis results to the reporting form, converting units, if necessary, to match those on the form, and return it to this office no later than the due date, together with a copy of the original laboratory analysis report and sample chain of custody.
2. Representative samples must be collected at the location described on the form; advise this office if you believe the location is inappropriate.
3. Self-monitoring early in the period and more frequently than required is highly recommended. Simply make additional copies of the ISMF and replace the ISMF# with "extra". Note however, that you must submit all representative self-monitoring results to this office as required by permit Attachment B (D.).
4. The "sample type" is specified for each characteristic or pollutant in Attachment B, "Self-Monitoring and Reporting Requirements", and is generally either a grab or a 24 hour composite. A grab requires that an individual sample be collected over a period of fifteen minutes or less. A 24-hour composite requires that a series of samples be collected over a 24 hour period representative of normal process operations and combined into a single container for analysis. The samples may be collected with automatic sampling equipment as 24-hour flow-proportioned or time-proportioned composite samples, or manually by combining a **minimum of (4)** grab samples. Grabs combined for a composite must be distributed over the 24 hour period by either flow or time; 24-hour composites must be flow-proportioned where feasible. Certain parameters including pH, temperature, flash point, and many TTO compounds require discrete grab samples and analyses. In contrast, the Evaluation only and Fixed probe with chart sample types do not require the actual collection of wastewater samples; for flow measurements and continuous pH recording use the sampling information fields to indicate the applicable time period.
5. Enter all information requested on the ISMF in the blanks provided:
 - a) Laboratory name - The name of the lab that performed the analysis; **a copy of the laboratory's report and chain of custody must accompany the ISMF.**
 - b) Sample Date - The date(s) over which the sample is collected
 - c) Sample Time(s) - The time at which the sample is collected
For grab samples, each individual sample time must be listed; for autosamplers, list the time compositing began, and the time it ended.
 - d) Sampler - The person(s) who collects the sample
 - e) Sample Description - The appearance of the sample. Indicate color, clarity, layering, etc.
 - f) Signature - certification statements must be signed and dated as required in the permit under STANDARD CONDITIONS, Signatory Requirements.

Failure to return the Self-Monitoring Report by the due date and/or submission of an incomplete ISMF will result in a reporting violation and the corresponding administrative fee. Questions about sampling, analysis, or reporting requirements should be directed to the Compliance Office at (858) 654-4100.

INDUSTRY SELF MONITORING FORM

City of San Diego Public Utilities
 Industrial Wastewater Control Program
 9192 Topaz Wy San Diego, CA 92123-1119
 Tel (858) 654-4100 Fax (858) 654-4110

Note: If Monthly Average Limits apply, these self-monitoring results will be averaged with all other VALID analyses for samples collected in the same calendar year including IWCP monitoring data, to determine compliance.

Michael Palmer
 San Diego Bay Enviro Restoration Fund South Trust
 c/o NASSCO MS 22A
 2798 Harbor Dr
 San Diego, CA 92113

 * RETURN REPORT *
 * by *
 * 15-OCT-2013 *

IU# Pmt#: 11-0563 01-A Conn: 100 ISMF#: 151684

Site Address: Harbor Dr, San Diego Permitted IW Flow: 288000
 Sample Point: Final 21,000 gallon tank of treatment system, just before water meter.

Laboratory Name: _____ * COPY OF ANALYSIS REQUIRED *

Sample#: 0151684-01 Date: _____ Time(s): _____

24 hour composite

Sampler: _____ Description: _____

<u>Parameter</u>	<u>Units</u>	<u>Daily Max</u>	<u>Result</u>
Chemical Oxygen Demand	mg/L		_____
Solids, Total Suspended	mg/L		_____
Copper, Total	mg/L		_____
Lead, Total	mg/L		_____
Nickel, Total	mg/L		_____
Zinc, Total	mg/L		_____
Arsenic, Total	mg/L	5	_____
Mercury, Total	mg/L	.2	_____

Sample#: 0151684-02 Date: _____ Time(s): _____

Evaluation only (no sample)

Sampler: _____ Description: _____

Beginning Meter Read and Date	gals		_____
Ending Meter Read and Date	gals		_____
Average Flow/calendar day thru Connection	gpd		_____
Imported Flow During Period	gals		_____
Maximum Flow/calendar day thru Connection	gpd		_____
Maximum gals/min thru meter	gpm	250	_____
Minimum gals/min thru meter when discharging	gpm	50-	_____

INDUSTRY SELF MONITORING FORM

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Industrial Wastewater Control Program
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Note: If Monthly Average Limits apply, these self-monitoring results will be averaged with all other VALID analyses for samples collected in the same calendar year including IWCP monitoring data, to determine compliance.

Michael Palmer
San Diego Bay Enviro Restoration Fund South Trust
c/o NASSCO MS 22A
2798 Harbor Dr
San Diego, CA 92113

* RETURN REPORT *
* by *
* 15-OCT-2013 *

IU# Pmt#: 11-0563 01-A Conn: 100 ISMF#: 151684

Site Address: Harbor Dr, San Diego Permitted IW Flow: 288000
Sample Point: Final 21,000 gallon tank of treatment system, just before water meter.

Laboratory Name: _____ * COPY OF ANALYSIS REQUIRED *

Sample#: 0151684-03 Date: _____ Time(s): _____

Pesticide and PCB grab

Sampler: _____ Description: _____

PCB's, Total ug/L 3 _____



THE CITY OF SAN DIEGO

Attention: (administrative contact identified on mailing label of envelope which bore this letter)

Subject: **Resource Conservation and Recovery Act (RCRA) and Related State of California Laws and Regulations**

Your firm holds one or more current Industrial User Discharge Permits issued by this agency. The number in the upper right corner of the mailing label, on the envelope which bore this letter, is the Industry Number on one such permit. The permit identifies the permitted facility and the industrial wastewaters permitted for discharge to the San Diego Metropolitan Sewer System.

As the generator of the above-mentioned industrial wastewaters, and perhaps other wastes from the same or other industrial processes, you may have obligations under the federal Resource Conservation and Recovery Act (RCRA) and related State of California laws and regulations. Under Title 40 of the Code of Federal Regulations (40 CFR), Part 403.8(f)(2)(iii), we are required to furnish you with information regarding such obligations.

RCRA and related state laws and regulations are administered for your facility by the County of San Diego Department of Environmental Health, Hazardous Materials Division (HMD). They may be reached at (858) 505-6880.

For the bulletin **Hazardous Waste Generator Requirements**, see the Department of Toxic Substance Control (DTSC) website at:

http://www.dtsc.ca.gov/HazardousWaste/upload/HWM_FS_Generator_Requirements.pdf.

For a listing of state-registered hazardous waste haulers operating in San Diego County, see the DTSC website at: <http://www.dtsc.ca.gov/HazardousWaste/Transporters/index.cfm>.

Please contact HMD if you have any questions on the material presented, or the City of San Diego Industrial Wastewater Control Program if your questions are related to your sewer discharge or pretreatment.

Sincerely,


Barbara Sharatz
Industrial Wastewater Control
Program Manager

BLS:mmb

Enclosure: Hazardous Waste Generator Requirements
Industrial Wastewater Control Program • Metropolitan Wastewater

9192 Topaz Way • San Diego, CA 92123-1119
Tel (858) 654-4100 Fax (858) 654-4110

