



NPDES Permit Renewal

Environmental Technologies Panel Meeting

February 19, 2009

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Background

- Previous Permits required annual testing of all discharges
- 2003 Permit required two years of monthly testing for copper, nickel and zinc for discharges of Fire Protection Water, Hydrostatic Relief Water and Flood Water from Graving Dock and Building Ways
 - A “Reasonable Potential Analysis” was conducted to comply with the California Toxics Rule
- 2008 Draft Permit
 - Sets limits for discharges based on the Reasonable Potential Analysis
 - Sets interim limits and final limits effective May 18, 2010
 - Current discharge concentrations are greater than proposed final limits for all discharges
 - Also requires additional testing of other discharges (floating drydock and graving dock gate ballast water)
 - Based on sampling results, limits could be imposed during a subsequent permit reissuance process or the permit could be modified pursuant to reopener provisions

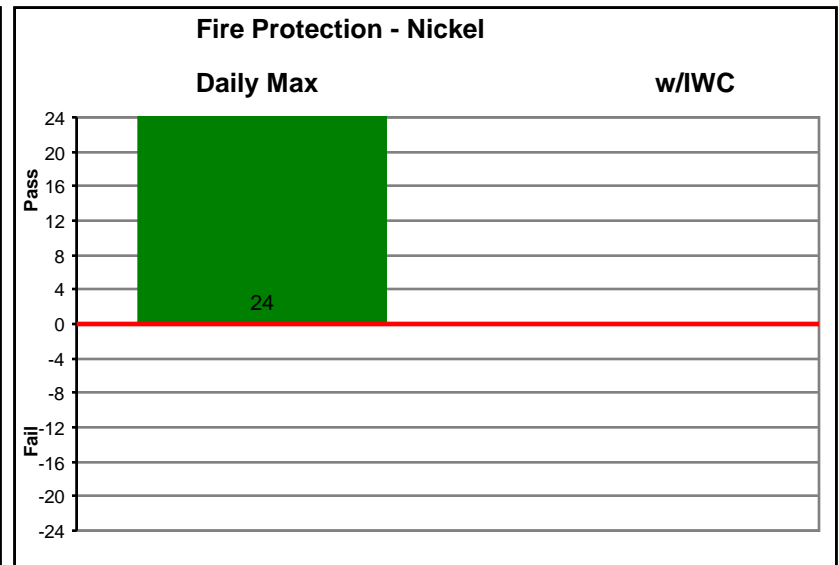
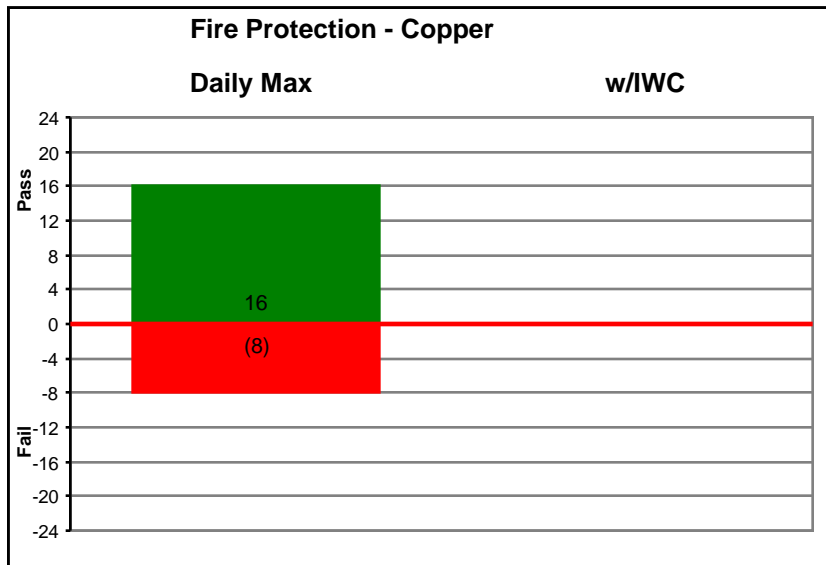
NASSCO's Discharge Limits Are Not Unique

- Puget Sound Naval Shipyard may be facing similar issue
- Similar Permits proposed for BAE Systems and Navy although discharges not all the same
 - Same adoption schedule
 - Working on joint efforts
- San Diego Convention Center was unable to comply with its permit limits regarding dewatering discharge and its permit was rescinded
 - City installed carbon treatment system which was found “ineffective” for “unknown” reasons
 - City found that proposed reverse osmosis system was only treatment option that would approach 100% compliance and would require \$3.1 million in capital costs, \$553,000 in annual O&M costs, in addition to the \$5.6 million sewer capacity fee
 - Convention Center now discharging to City sewer system; required to pay one-time sewer capacity fee of \$5.6 million with estimated annual discharge costs of more than \$500,000

Fire Protection (Copper, Nickel)

Pass

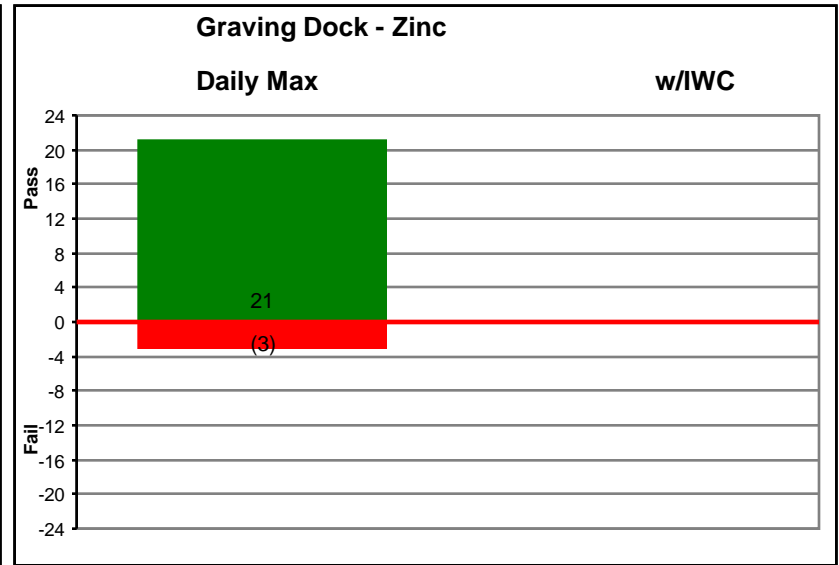
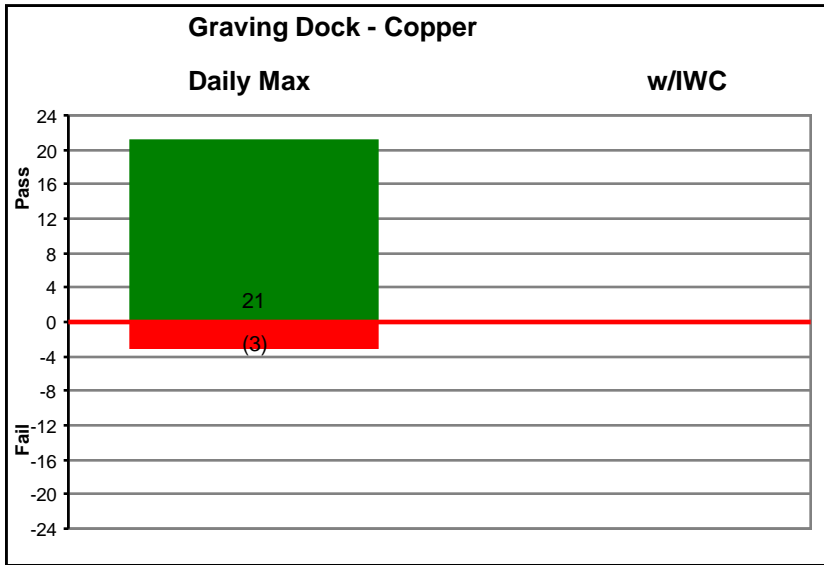
Fail



Graving Dock Hydrostatic (Copper, Zinc)

Pass

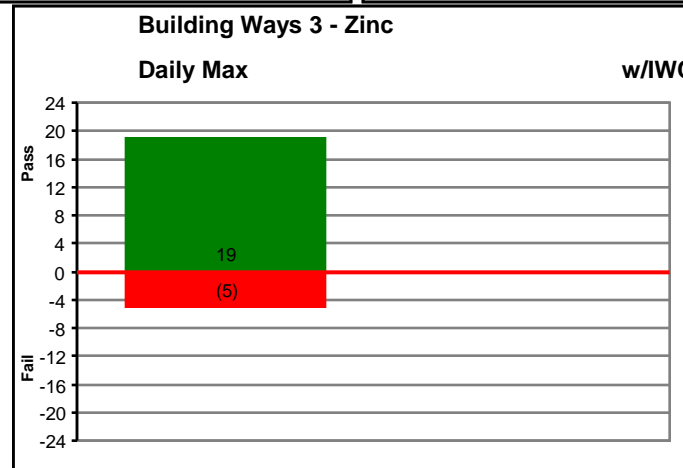
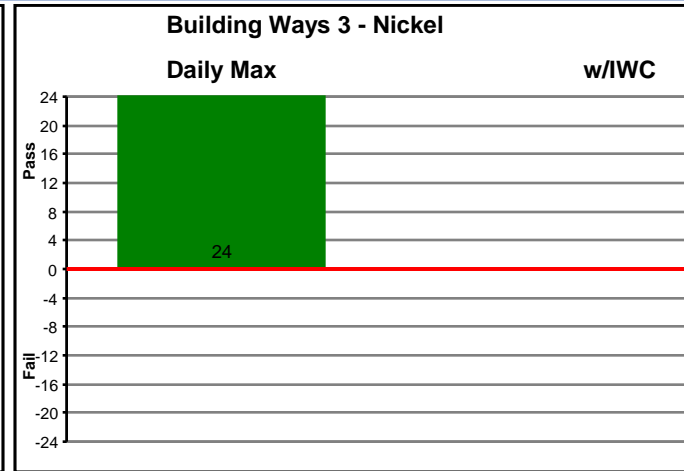
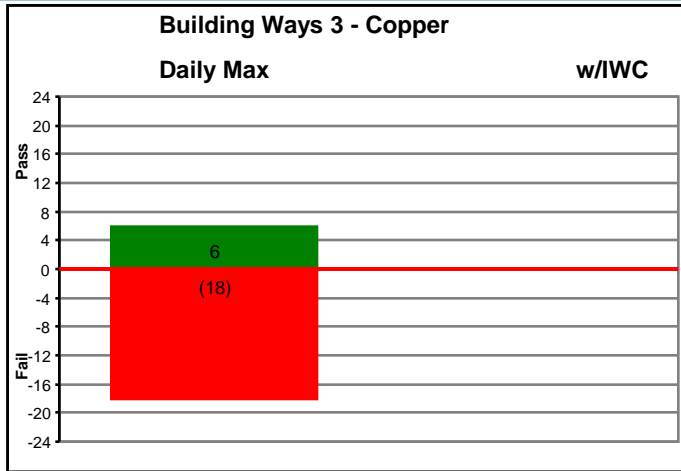
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Building Ways 3 Hydrostatic (Copper, Nickel, Zinc)

Pass

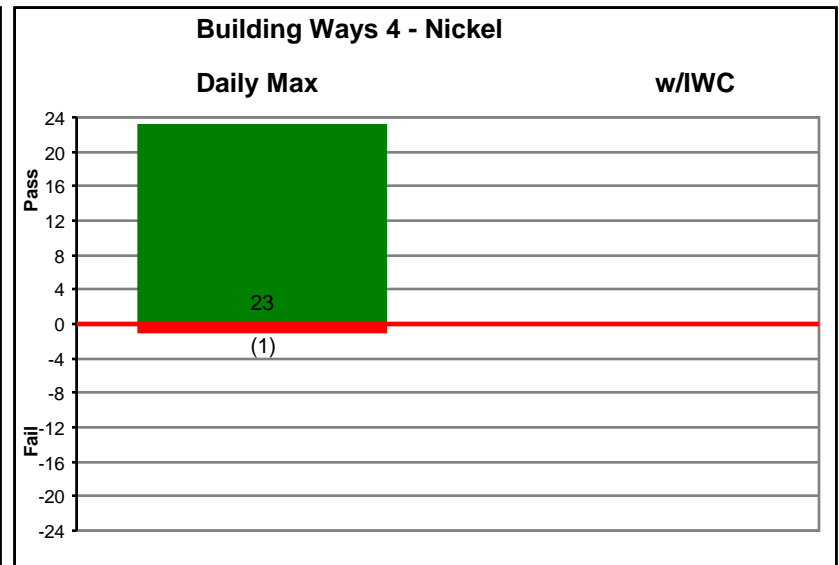
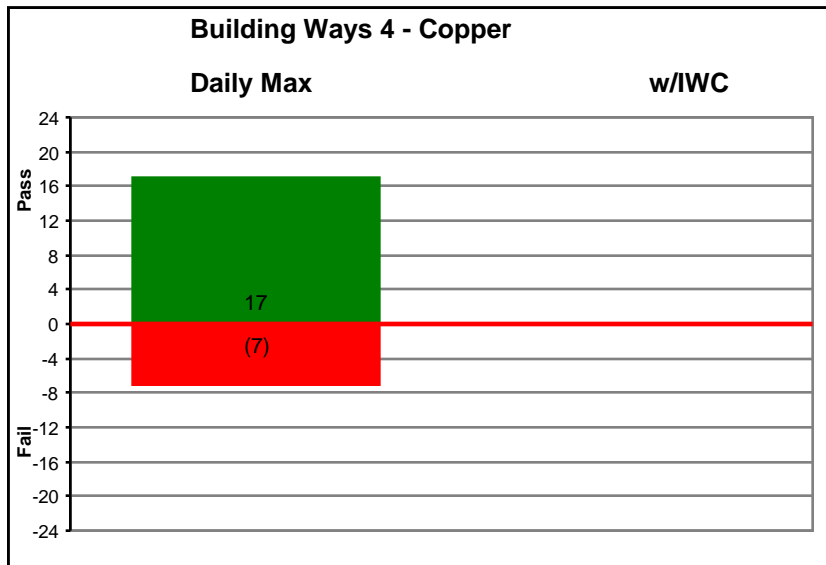
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Building Ways 4 Hydrostatic (Copper, Nickel)

Pass

Fail



Options Being Evaluated

- Assess benefits of Intake Water Credit's (IWC's)
 - Request and justification submitted to Board
- Assess existing Site Specific Translator (SST) data
 - Based on analysis Navy, San Francisco Bay and South Bay Power Plant data would not modify proposed effluent limits enough to achieve compliance for any chemicals or discharge systems
- Develop SST study plan
 - Study will be a post-permit adoption action as will not affect interim limits, only final limits
 - Permit has re-opener language when new data is available
 - We will conduct sampling during launch of PC-2 to evaluate potential benefit of site specific data
- Holding regular meetings with Board Staff to discuss permit requirements
- Permit is not scheduled to go before the Board until April or May

Options Being Evaluated – Con't

- Treatment Technology Analysis
 - Conducting a Ion Exchange pilot project
 - Samples provided to IX manufactures
 - Manufactures' evaluation and lab results to complete 3/10
 - Identify facilities currently using the technology and arrange site visits
- Alternative to treatment - Possible discharge to City sewer system
 - Request submitted to City to allow existing 400 gpm storm water discharge authority to be used for hydrostatic relief water and flood water and increase limit to 600 gpm total
 - Verbally City has approved request and limit will be increased to 600 gpm
- Evaluate potential contaminant sources for Ways and Graving Dock floodwater and determine methods to reduce or eliminate
- Evaluate sampling procedures and recommend improvements