



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE  
Chief Engineer and General Manager

August 3, 2017  
File No. 31-370-40.4A

**VIA ELECTRONIC MAIL**

Mr. Raul Medina, WRC Engineer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West Fourth Street, Suite 200  
Los Angeles, CA 90013

Dear Mr. Medina:

**Comments on Tentative Waste Discharge Requirements (WDRs) and National Pollutant Discharge Elimination System (NPDES) Permit for the Groundwater Reliability Improvement Project – Advanced Water Treatment Facility (NPDES Permit No. CA0064645)**

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to provide comments on the Tentative Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) Permit (Tentative Permit) for the Groundwater Reliability Improvement Project – Advanced Water Treatment Facility (GRIP-AWTF) dated July 5, 2017. The Sanitation Districts request that the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) modify the Tentative Permit based on the requests herein.

**Comment 1. Language Applicable to POTWs**

The Tentative Permit includes various requirements and language related to wastewater treatment facilities or publicly-owned treatment works (POTWs) that do not apply to the GRIP-AWTF. POTWs and the GRIP-AWTF have fundamentally different purposes and this permit should reflect such differences. The primary purpose of POTWs is to protect public health and the environment by accepting and treating wastewater. Recycled water is produced at many POTWs, but Clean Water Act and Porter-Cologne provisions relating to POTWs are focused on the primary purpose of protecting public health and the environment. The primary purpose of the GRIP-AWTF is to supplement water supply by producing advanced treated recycled water for injection and spreading to replenish groundwater basins. As such, the provisions treating the GRIP-AWTF as a POTW need to be removed, as detailed in the Water Replenishment District of Southern California's (WRD's) comments to the Regional Board on this Tentative Permit.

Furthermore, contrary to statements in the Tentative Permit the GRIP-AWTF is not a part of the Sanitation Districts' POTW system, and certain requirements applicable to the POTW (i.e., the San Jose Creek Water Reclamation Plant (SJCWRP)), are not automatically applicable to the GRIP-AWTF simply because it utilizes the tertiary treated recycled water from the SJCWRP as a raw material. The Sanitation Districts own and operate the SJCWRP, and meet all Clean Water Act and Porter-Cologne requirements relevant to POTWs. It is not necessary to impose these requirements on the GRIP-AWTF as well.

**Comment 2. Reporting for Minor Spills**

The Tentative Permit requires that “The Permittee shall immediately (but no later than two hours) notify the Regional Water Board of an unauthorized discharge of less than fifty thousand (<50,000) gallons of tertiary recycled water...” The requirement to report all spills is excessive and should be removed from the Tentative Permit, as further explained below.

Water Code Section 13529.2 specifies that notification requirements for unauthorized discharges of tertiary treated recycled water apply when the volume of recycled water reaches 50,000 gallons or more. Thus, there is no basis for requiring notification for volumes less than 50,000 gallons. Minor spills of highly purified recycled water would not be expected to have adverse impacts on public health or the environment, so it is not clear what is to be gained by an immediate reporting requirement. Additionally, this provision on reporting of minor spills is not found in other NPDES permits for facilities producing advanced treated recycled water for various uses (i.e., West Basin Municipal Water District (WBMWD) Juanita Millender-McDonald Carson Regional Water Recycling Plant (Order No. R4-2013-0046, NPDES No. CA0064246); WBMWD Edward C. Little Water Recycling Plant (Order No. R4-2012-0026, NPDES No. CA0063401)). It is also not found in the State Water Resource Control Board’s (State Water Board) Recycled Water Policy, the State Water Board’s general permit for recycled water use (Order WQ 2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use), or, to our knowledge, other permits issued by the Regional Board.

**Comment 3. Duplicative Receiving Water Monitoring and Reporting**

The Tentative Permit includes monitoring and reporting requirements for receiving water monitoring. As noted in the Monitoring and Reporting Program (MRP), receiving water monitoring is already performed by the Sanitation Districts under the SJCWRP NPDES Permit (Order No. 2015-0070) and the Whittier Narrows Water Reclamation Plant (WNWRP) NPDES Permit (Order No. R4-2014-0213-A01) at these same receiving water monitoring stations. To avoid duplicative monitoring efforts between permits with overlapping receiving monitoring stations, the Tentative Permit allows existing monitoring to cover the requirements of this permit. However, monitoring requirements may change when the SJCWRP and WNWRP NPDES permits are renewed. WRD would then be compelled to continue to do any monitoring no longer required under the SJCWRP and WNWRP permits, incurring an unnecessary expense.

Additionally, the Tentative Permit requires receiving water data already collected and reported under the SJCWRP and WNWRP NPDES permits to be submitted under the GRIP-AWTF NPDES permit. It is not clear what is meant to be accomplished by this duplicative reporting. The Regional Board will already have the information that is submitted by the Sanitation Districts, and the information will already be available to the public via the CIWQS system. Such duplicative reporting imposes an unnecessary cost and is contrary to the State Water Board’s direction to encourage recycled water usage. It also introduces a source of errors in the CIWQS database, due to the potential for errors when WRD submits the Sanitation Districts’ data. It also may cause difficulties when the State Water Board migrates CIWQS data to the CEDEN system, because there will be duplicate data in the system.

Therefore, to avoid potential confusion, discrepancy, and duplication, no separate receiving water monitoring program should be required in the Tentative Permit. Instead, the receiving water monitoring provision in the MRP (Section VIII) should be revised to replace all existing language with the following<sup>1</sup>:

“A receiving water monitoring program is not prescribed in this Order because receiving water monitoring for the Discharge Points 001, 001A, and 001B is covered under the SJCWRP NPDES Permit (Order No. R4-2015-0070, NPDES No. CA0053911) and Monitoring and Reporting

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<sup>1</sup> Language taken from the WBMWD Juanita Millender-McDonald Carson Regional Water Recycling Plant NPDES permit (Order No. R4-2013-0046, NPDES No. CA0064246) and the WBMWD Edward C. Little Water Recycling Plant NPDES permit (Order No. R4-2012-0026, NPDES No. CA0063401).

Program (CI-5542), and the WNWWRP NPDES Permit (Order No. R4-2014-0213-A01, NPDES No. CA0053716) and Monitoring and Reporting Program (CI-2848).”

The Sanitation Districts thank you in advance for your careful consideration of these comments. If you have any questions concerning this letter or need additional information, please contact Erika Bensch at (562) 908-4288, extension 2836, or erikabensch@lacsdsd.org.

Very truly yours,



Ann T. Heil  
Section Head  
Reuse and Compliance

ATH:MG:nm

cc: Cris Morris, David Hung, Regional Board