

Response to Comments

City of Los Angeles
Terminal Island Water Reclamation Plant
Tentative National Pollutant Discharge Eliminations System (NPDES) Amendment

This Table describes all significant comments received from interested persons with regard to the above-mentioned tentative amendment. Each comment has a corresponding response and action taken.

Commenter	#	Comment	Response	Action Taken
Comments Received from Joyce Dillard on September 21, 2015				
Joyce Dillard	1	<p>There are references to several communications with the City of Los Angeles that are not included in the report:</p> <ul style="list-style-type: none"> · July 13, 2015 · July 21, 2015 · July 22, 2015 · August 11, 2015 <p>The Regional Boards response was not included for:</p> <ul style="list-style-type: none"> · July 29, 2015 	<p>Please see the attached e-mail communication between the City of Los Angeles and the Regional Water Board referenced in the amendment. The July 22, 2015, letter referenced in the amendment was a typographic error. This reference should be the e-mail submitted by the City of Los Angeles on July 21, 2015, described in item number 4 of the amendment.</p>	<p>Modification was made to the amendment.</p>
Joyce Dillard	2	<p>Data is important in determining if the permit is in compliance. There is a reference to the LA Municipal Separate Storm Sewer Permit MS4 as being sufficient for monitoring.</p> <p>We disagree with the removal of the monitoring station:</p> <p>Monitoring Location Name HW07</p> <p>Monitoring Location 33.722500 N, 118.270000 W</p> <p>This is a Separate Permit and should retain Monitoring Stations and Data that the public can</p>	<p>Monitoring location HW07 has historically been monitored as part of the NPDES permit for compliance with the Los Angeles Harbor (Harbor) Bacteria Total Maximum Daily Load (TMDL). The Terminal Island Water Reclamation Plant is not a significant source of bacteria to the Main Ship Channel of the Harbor. The major contributors of elevated bacterial indicator densities in the Main Ship Channel during dry and wet weather are, dry-weather urban runoff, and storm water conveyed by storm drains. The source analysis of the TMDL reads as follows:</p> <p>“Dry-weather urban runoff and storm water conveyed by storm drains are major sources of elevated bacterial indicator densities to Inner Cabrillo Beach and the Main Ship Channel during dry and wet-weather. As of March 2004, there are 15 active individual and 15 active general, NPDES permits for discharges to the Inner or Outer</p>	<p>Modification was made to the amendment.</p>

Comment er	#	Comment	Response	Action Taken
		<p>identify and request.</p> <p>Joyce Dillard P.O. Box 31377 Los Angeles, CA 90031</p>	<p>Los Angeles Harbor including the Terminal Island Treatment Plant. While the fecal coliform counts in the wastewater field indicate a contribution of bacteria to the Harbor by the Terminal Treatment Plant, the wastewater field is sufficiently diluted and the bacterial densities are so much lower in the Harbor than the high bacterial densities and exceedances at the sites at Cabrillo Beach and in the Main Ship Channel that it appears that the Treatment Plant is not a significant source of bacteria to the Beach or to the Ship Channel.”</p> <p>Since dry-weather urban runoff and storm water conveyed by storm drains are the major contributors to the bacterial indicator densities, it is more appropriate for the Regional Water Board to require the City of Los Angeles to monitor bacteria in the Main Ship Channel under the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit. In an effort to prevent duplication of monitoring requirements between the NPDES and MS4 permits, the Regional Water Board has removed the Harbor Bacteria TMDL-based monitoring requirements from the NPDES permit including monitoring locations CB1, CB2, and HW07. The Harbor Bacteria TMDL-based monitoring will continue to be monitored by the City of Los Angeles during dry weather as part of the MS4 permit requirements. Monitoring of CB1 and CB2 will continue five days per week, and at HW07 once per week. The monitoring plan for these Harbor Bacteria TMDL-based monitoring locations may be accessed here: http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/dominguez_channel/</p> <p>Although the Harbor Bacteria TMDL-based monitoring requirement is no longer included in the NPDES permit, the monitoring results should continue to be reported with the monthly and annual Terminal Island NPDES monitoring reports. The amendment has been revised to include section XI.E.8. in the Monitoring and Reporting Program to require the City of Los Angeles to report the results from the Harbor Bacteria TMDL-based monitoring for CB1, CB2, and HW07, with the NPDES monitoring reports.</p>	

Attachment A

Webb, Steven J.@Waterboards

From: Abraham Razon <abraham.razon@lacity.org>
Sent: Monday, July 13, 2015 5:03 PM
To: Webb, Steven J.@Waterboards
Subject: Additional Comments on the 2015 TIWRP NPDES Permit
Attachments: TIWRPPermit Additional Comments.doc

Hi Steven,

Upon further review of the 2015 TIWRP NPDES Permit, which becomes effective on August 1, 2015, the City is submitting additional comments (see attached) for your review, clarification, and/or correction. While some of the comments refer to simple typo error and inconsistencies in the naming of parameters, other comments seek your clarification on the definition of specific parameter. If you have any questions, please contact me at 213-485-0577. Thank you.

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Abraham Razon
Environmental Engineer
Regulatory Affairs Division, Bureau of Sanitation
City of Los Angeles
Tel. No. 213-485-0577

2015 TIWRP NPDES Additional Permit Comments
July 13, 2015

Comment #	Document Reference (Doc. #, Page #, Section # Paragraph #)	Issue	Comments
1	WDR, Effluent Limitations Table 4, Page 7 MRP Table E-3, Page E-13	Definitions needed for Total PCBs, DDTs, and PAHs with a parameter list.	The Total PCBs, Total DDTs, and Total PAHs for the Mass-Based Effluent Limitations on Page 7 of the Order and also on Table E-3 on page E-13 should be defined clearly with a parameter list. The new Permit is using the terms for PCBs and PAHs differently than in any previous or other NPDES permits.
2	WDR, Page 28-29, item J. MRP, Page E-16, item 1.	Correction to IWC needed	The approved dilution credit is 65. The new Permit still shows the incorrect IWC of 1.6% effluent (for 1/62) on Page 29, item J of the Order and also on Page E-16, item 1. The IWC should be corrected to 1.5% (for 1/66).
3	MRP, Table E-2, Page E-12 and Table E-3, Page E-14	Correction needed for Chromium sample type. Needs to be “grab” sample type.	The influent and effluent monitoring tables list remaining EPA priority pollutants as a 24-hr composite and a grab for VOCs and Chromium VI. Chromium, which falls under the priority pollutant category, needs to be specified as a grab as well. Otherwise, chromium will be analyzed on a 24-hr composite sample type. The chromium sample type should be corrected to “grab”.
4	MRP, Table E-3, Page E-14 MRP, Table E-10, Page E-28	Pesticides	The names of the parameter should be consistent. Change “Pesticides” in Table E-3, Page E-14 to “Orthophosphate (OP) Pesticides” as listed in Table E-10, Page 28.
5	MRP, Page E-24, item B.1.	Remove HW-07 as it is monitored under the MS4 permit.	HW-07 should not have been included as it is part of the MS4 permit. Inner Cabrillo Beach shoreline stations CB1 and CB2 and Main Ship Channel site HW07 are monitored under the 2012 Municipal Separate Storm Sewer System (MS4), LA Harbor Bacteria TMDL, however, only CB1 and CB2 have been removed from the 2015 TIWRP Permit.
6	MRP, Table E-9, page E-27	Chronic Toxicity Stations	The new Permit still has the old stations HW24 and HW43 listed in Table E-9. The new chronic toxicity monitoring stations are HW62 and HW20. Correct the chronic toxicity stations in Table E-9
7	MRP, Table E-10 on page E- 28	Correction needed to reporting units for data management purposes. Historical NPDES reporting units were as specified in	The reporting units on the sediment organic compounds have not been corrected per submitted comments. Phenolic, chlorinated hydrocarbons, and PAH derivative compounds reporting units are OK as mg/Kg. Pesticides and PCBs should have a reporting unit of ug/Kg in order for our databases to manage these data. Here is a listing of constituents that should be reported in ug/Kg: Aldrin, Dieldrin, Endrin, Hexachlorocyclohexane, Chlordanes

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		the comment.	(A-Chlordane, G-Chlordane, Cis-Nonachlor, Trans-Nonachlor, Oxychlordane), DDT derivatives, Total PCBs, PCB derivatives, & Toxaphene.
8	MRP, Table E-10, Page E-29	Chlorinated Hydrocarbons	Request the Board to specify the Chlorinated Hydrocarbons compound list. 40 CFR, Part 136, Method 612, defines the Chlorinated Hydrocarbons as including 9 compounds: 2-Chloronaphthalene, 1,2-Dichlorobenzene, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, Hexachlorobenzene, Hexachlorobutadiene, Hexachlorocyclopentadiene, Hexachloroethane, and 1,2,4-Trichlorobenzene.
9	MRP, Table E-10, Page E-28 MRP Table E-3, Page E-13	Total PCB	Request the Board to change "Total PCB" to "PCB as congeners" based on the Table E-10, Page E-28, Footnote 26 which defines it as 41 PCB congeners. In Table E-3, Page E-14, Footnote 11, the same 41 PCB congeners are listed as "PCBs as congeners". Both footnotes 11 and 26 should be consistent.
10	MRP, Table E-10, Page E-28 & Table E-3, Page E-13	Total DDT	Request the Board to revise Footnote #25 to Table E-10 define total DDT as the sum of 4,4' DDT, 2,4'-DDT, 4,4'-DDE, 2,4'-DDE, 4,4'-DDD, and 2,4' DDD. To be consistent with the Total DDTs in Table E-10, we are suggesting adding a footnote Table E-3, Page E-13 which defines total DDT as the sum of 4,4' DDT, 2,4'-DDT, 4,4'-DDE, 2,4'-DDE, 4,4'-DDD, and 2,4' DDD, be added for Table E-3.
11	MRP, Table E-10, Page E-28 & Table E-3, Page E-13	PCB derivatives	Request the Board to change "PCB derivatives" to "PCBs as aroclors" to be consistent with the definition for effluent in the last row of Table E-3, on page E-13. Table E-10, Page E-28, Footnote 27 defines it as 7 Aroclors, by EPA method 608
12	MRP, Table E-10, Page E-29	Total PAH	Request the Board to specify the Total PAH list and the definition of High and Low Molecular Weight PAHs. Usually the high molecular weight PAHs are defined as having four or more aromatic rings and the low molecular weight PAHs as having three or fewer aromatic rings. Based on the list (MRP, Table E-10, footnote 29, page E-29), there are 13 PAHs. Out of these 13 PAHs, 4 (Acenaphthylene, Anthracene, Fluorene, and Phenanthrene) belong to low molecular weight group and 9 (Benz(a)anthracene, Benzo(b)fluoranthene, Benzo(k) fluoranthene, Benzo(g,h,i) perylene, Benzo(a)pyrene, Chrysene, Dibenzo(a,h)anthracene, Indeno(1,2,3-cd)pyrene and Pyrene) belong to high molecular weight group.

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13	MRP, Table E-10, Page E-28	Orthophosphate (OP) Pesticides"	Request the Board to specify the OP compound list. Sediment OP Pesticides on page E-28, Table 10, should be the same as "Pesticides" for effluent EFF-001, in Table E-3 on Page E-14, Footnote 12, Pesticides are, six constituents referred to in 40CFR, part 125.58(m): demeton, guthion, malathion, methoxychlor, mirex, and parathion.
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Attachment B

Webb, Steven J.@Waterboards

From: Abraham Razon <abraham.razon@lacity.org>
Sent: Tuesday, July 21, 2015 2:10 PM
To: Webb, Steven J.@Waterboards
Cc: Hassan Rad
Subject: Re: Additional Comments on the 2015 TIWRP NPDES Permit
Attachments: TIWRPPermit Additional Comments as of July 21 2015.doc

Hi Steven,

Sorry, I forgot to attach the comment matrix.

On Tue, Jul 21, 2015 at 2:03 PM, Abraham Razon <abraham.razon@lacity.org> wrote:
Hi Steven,

RAD conducted the TIWRP 2015 NPDES Permit Turn-Over Workshop this morning where we presented to LASAN staff (Plant, Laboratory, Pretreatment) the highlights and changes in the new permit. There were more questions and comments raised during our presentation, which seeks further clarification from the Regional Water Board. In addition to what I sent you last July 13, 2015, I have added these comments to the comment matrix, which are comments #16-20.

Two important comments that needs to be resolved as soon as possible are the following:

1. New Effluent Limit based on Harbor Toxic TMDL WLA for Sediments (Comment #18):

City is seeking clarification from Regional Board if there is an agreement about holding off on Harbor Toxics TMDL effluent mass-based limits until 2018. Footnote 9 on Page 7 is not definitive about whether the limits in the Permit are currently in effect or not. The permit footnote should state it plainly.

In addition, if the limits are not effective until 2018, when will the monthly effluent monitoring requirement for copper, lead, zinc, Total PAH, Total DDT and Total PCBs be effective?

2. Quarterly, semiannual, and annual monitoring implementation dates (Comment #17)

Need to get Board's understanding that the first TI new permit quarterly monitoring will be in October-December 2015, the semiannual monitoring will occur in January-March 2016, and the annual monitoring will occur on July 1-September 30, 2016, as the "or on" language makes the implementation date unclear.

If you have any questions regarding these comments, please contact me. Thanks.

On Mon, Jul 20, 2015 at 9:38 AM, Webb, Steven J.@Waterboards <Steven.Webb@waterboards.ca.gov> wrote:
I will make sure to include those comments as well. Thank you for your patience.

-Steven

From: Abraham Razon [abraham.razon@lacity.org]
Sent: Monday, July 20, 2015 9:36 AM
To: Webb, Steven J.@Waterboards
Cc: Hassan Rad
Subject: Re: Additional Comments on the 2015 TIWRP NPDES Permit

Hi Steven,

Thank you for your email. LASAN is looking forward to the Regional Water Board's clarification letter. Please don't forget to include the two other comments I raised with you last Friday - 1) TCDD Equivalent limits and 2) the beginning dates of the Quarterly, Semi-Annual, and Annual Monitoring Period. Please contact me if you have any questions.

On Mon, Jul 20, 2015 at 8:20 AM, Webb, Steven J.@Waterboards <Steven.Webb@waterboards.ca.gov> wrote:
Hi Abraham -

I am working on a clarification letter on the adopted Terminal Island permit. This letter need to be signed by the Executive Officer so I am hoping to have the letter out by the end of the week.

-Steven

From: Abraham Razon [abraham.razon@lacity.org]
Sent: Monday, July 13, 2015 5:02 PM
To: Webb, Steven J.@Waterboards
Subject: Additional Comments on the 2015 TIWRP NPDES Permit

Hi Steven,

Upon further review of the 2015 TIWRP NPDES Permit, which becomes effective on August 1, 2015, the City is submitting additional comments (see attached) for your review, clarification, and/or correction. While some of the comments refer to simple typo error and inconsistencies in the naming of parameters, other comments seek your clarification on the definition of specific parameter. If you have any questions, please contact me at [213-485-0577](tel:213-485-0577). Thank you.

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2015 TIWRP NPDES Additional Permit Comments
July 13, 2015 (Updated July 21, 2015)

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8	MRP, Table E-10, Page E-29	Chlorinated Hydrocarbons	Request the Board to specify the Chlorinated Hydrocarbons compound list. 40 CFR, Part 136, Method 612, defines the Chlorinated Hydrocarbons as including 9 compounds: 2-Chloronaphthalene, 1,2-Dichlorobenzene, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, Hexachlorobenzene, Hexachlorobutadiene, Hexachlorocyclopentadiene, Hexachloroethane, and 1,2,4-Trichlorobenzene.
9	MRP, Table E-10, Page E-28 MRP Table E-3, Page E-13	Total PCB	Request the Board to change "Total PCB" to "PCB as congeners" based on the Table E-10, Page E-28, Footnote 26 which defines it as 41 PCB congeners. In Table E-3, Page E-14, Footnote 11, the same 41 PCB congeners are listed as "PCBs as congeners". Both footnotes 11 and 26 should be consistent.
10	MRP, Table E-10, Page E-28 & Table E-3, Page E-13	Total DDT	Request the Board to revise Footnote #25 to Table E-10 define total DDT as the sum of 4,4' DDT, 2,4'-DDT, 4,4'-DDE, 2,4'-DDE, 4,4'-DDD, and 2,4' DDD. To be consistent with the Total DDTs in Table E-10, we are suggesting adding a footnote Table E-3, Page E-13 which defines total DDT as the sum of 4,4' DDT, 2,4'-DDT, 4,4'-DDE, 2,4'-DDE, 4,4'-DDD, and 2,4' DDD, be added for Table E-3.
11	MRP, Table E-10, Page E-28 & Table E-3, Page E-13	PCB derivatives	Request the Board to change "PCB derivatives" to "PCBs as aroclors" to be consistent with the definition for effluent in the last row of Table E-3, on page E-13. Table E-10, Page E-28, Footnote 27 defines it as 7 Aroclors, by EPA method 608
12	MRP, Table E-10, Page E-29	Total PAH	Request the Board to specify the Total PAH list and the definition of High and Low Molecular Weight PAHs. Usually the high molecular weight PAHs are defined as having four or more aromatic rings and the low molecular weight PAHs as having three or fewer aromatic rings. Based on the list (MRP, Table E-10, footnote 29, page E-29), there are 13 PAHs. Out of these 13 PAHs, 4 (Acenaphthylene, Anthracene, Fluorene, and Phenanthrene) belong to low molecular weight group and 9 (Benz(a)anthracene, Benzo(b)fluoranthene, Benzo(k) fluoranthene, Benzo(g,h,i) perylene, Benzo(a)pyrene, Chrysene, Dibenzo(a,h)anthracene, Indeno(1,2,3-cd)pyrene and Pyrene) belong to high molecular weight group.

2015 TIWRP NPDES Additional Permit Comments
July 13, 2015 (Updated July 21, 2015)

13	MRP, Table E-10, Page E-28	Orthophosphate (OP) Pesticides"	Request the Board to specify the OP compound list. Sediment OP Pesticides on page E-28, Table 10, should be the same as "Pesticides" for effluent EFF-001, in Table E-3 on Page E-14, Footnote 12, Pesticides are, six constituents referred to in 40CFR, part 125.58(m): demeton, guthion, malathion, methoxychlor, mirex, and parathion.
14	MRP, Table E-1, Page E-8	Sediment monitoring program	For Harbor Toxics Stations listed as Station ID#8 and ID#9. Do we need to perform any monitoring for these? No monitoring specifications are present.
15	MRP, Table E-1, Page E-8, and Pages E-34, & E-36	Sediment monitoring program	Need clarification about effects the Harbor Toxics TMDL has on our routine sediment monitoring program.
16	MRP, page E-28	LAH sediment monitoring for Acid Volatile Sulfides	Requesting initiating monitoring of Acid Volatile Sulfides by early 2016 as the method needs to be develop and certified.
17	MRP, Table E-13, page E-37-38	Quarterly, semiannual, and annual monitoring implementation dates	Need to get Board's understanding that the first TI new permit quarterly monitoring will be in October-December 2015, the semiannual monitoring will occur in January-March 2016, and the annual monitoring will occur on July 1-September 30, 2016, as the "or on" language makes the implementation date unclear.
18	WDR, Page 7, Footnote 9 MRP, Page E-13, Table E-3	About mass loading limitations not going into effect until 2018	City is seeking clarification from Regional Board if there is an agreement about holding off on Harbor Toxics TMDL effluent mass-based limits until 2018. Footnote 9 on Page 7 is not definitive about whether the limits in the Permit are currently in effect or not. The permit footnote should state it plainly. In addition, if the limits are not effective until 2018, when will the monthly effluent monitoring requirement for copper, lead, zinc, Total PAH, Total DDT and Total PCBs be effective?
19	MRP, Table E-3, Page E-13	Total PCB's, PCBs as Aroclors, PCBs as congeners	Seeking clarification why Total PCBs is monthly, PCBs as aroclors is quarterly, and PCBs as congeners is annually, when PCBs as aroclors and as congeners are component of the Total PCBs.
20	WDR, Table 4, Page 6	2,3,7,8 TCDD (Dioxin)	The permit should state 2,3,7,8-TCDD Equivalents in Table 4 and Table E-3.

Attachment C

Webb, Steven J.@Waterboards

From: Webb, Steven J.@Waterboards
Sent: Wednesday, July 29, 2015 11:35 AM
To: Abraham Razon
Cc: Hassan Rad (hassan.rad@lacity.org)
Subject: TIWRP Comments

Hi Abraham –

The comments submitted will all be formally addressed in the amendment that is scheduled for the October Board meeting; however, I address the comments in this e-mail to serve as clarification of the intention of the monitoring requirements when the permit was developed. Please let me know if you have any further questions after reading through these clarifications as the amendment will include similar language.

- 1. WDRs Section IV.A, Table 4, page 7 and Monitoring and Reporting Program (MRP) Section V.A, page E-13, Table E-3.** For final effluent monitoring requirements and for the final effluent limitations that serve to ensure compliance with the Harbor Toxics Total Maximum Daily Load (TMDL) Waste Load Allocations (WLAs), such as Total PCBs, DDTs, and PAHs, please refer to the Coordinated Compliance Monitoring and Reporting Plan (CCMRP) approved by TMDL staff of the Regional Water Board on June 06, 2014. Tables 17 and 18 of the CCMRP list the constituents that should be monitored for compliance with Total PCBs, PAHs, and DDTs.
- 2. MRP Section IX.E.1, page E-29, Table E-10.** The chlorinated hydrocarbons that should be monitored for compliance with the chlorinated hydrocarbon sediment monitoring requirement include: aldrin, dieldrin, endrin, heptachlor, chlordane, and endosulfan.
- 3. MRP Section IX.E.1, page E-28, Table E-10 and Section V.A, page E-13, Table E-3.** “DDT Derivatives” refers to each DDT compound that shall be reported individually, whereas “Total DDT” refers to the sum of all DDT compounds. “Total DDT” is not defined in Table E-3 or Table E-10. Total DDT means the sum of 4,4'-DDT, 2,4'-DDT, 4,4'-DDE, 2,4'-DDE, 4,4'-DDD, and 2,4'-DDD.
- 4. MRP Section IX.E.1, page E-28, Table E-10.** For the purposes of sediment monitoring, “Total PAH” should include the sum of the PAHs defined in Appendix I of the 2012 California Ocean Plan and listed in footnote 29, Table E-10, page E-29. For the purposes of water quality monitoring, “Total PAHs” should include the sum of the PAHs listed in Table 18 of the approved CCMRP.
- 5. MRP Section III, page E-8, Table E-1.** The Harbor Toxics sampling stations come from the CCMRP. These are listed in Table E-1 because at a minimum, the results of the CCMRP monitoring from these two sites must be submitted as part of the NPDES compliance report.
- 6. MRP Section III, page E-8, Table E-1, page E-8, Section X.A.5, page E-34, and Section XI.B, page E-36.** The City of Los Angeles must monitor the receiving water as required in Order No. R4-2015-0119 and in the approved CCMRP. If any of the sample locations and monitoring requirements are identical, the monitoring requirements do not need to be duplicated. In this case, the sampling results may be submitted in both the CCMRP and NPDES reports, in lieu of duplicative monitoring.
- 7. MRP Section IX.E.1, page E-28.** Compliance with the acid volatile sulfide sediment monitoring requirement is effective on the effective date of the permit and shall be monitored once during the 2015 calendar year. If the in-house laboratory is not certified to conduct the analysis, the samples may be sent out to a contract lab for analysis.

- 8. MRP Section XI.C.3, page 37-38, Table E-13.** If monitoring for any monitoring period has not been completed by the effective date of the permit, the monitoring requirements in Order R4-2015-0119 apply on the effective date of the permit. The monitoring period for the first quarterly report shall be July 1 to September 30, 2015. The monitoring period for the first semiannual report shall be July 1 to September 30, 2015. The monitoring period for the first annual report shall be July 1 to Sept 30, 2015.
- 9. WDR Section IV.A, page 7, and MRP Section V.A, page E-13, Table E-3.** The monthly monitoring for copper, lead, zinc, Total PAH, Total DDT, and Total PCBs shall begin on the effective date of the Order. The effective date of the TMDL WLA-based final effluent limitations, for the pollutants listed above, is contingent on the reconsideration of the Harbor Toxics TMDL WLAs as well as the outcome of the special studies approved by the Executive Officer. The final sentence in footnote 9 of the WDR specifically states this condition:
- “...The effective date of the final effluent limitations based on the Harbor Toxics TMDL will be determined after the reconsideration of the TMDL WLAs and will consider the timing for any remedies, if applicable.”
- 10. MRP Section V.A, page E-14, Table E-3, and Section IX.E.1, page E-28, Table E-10.** OP should refer to Organophosphate Pesticides and this will be corrected in the amendment. There is also an incorrect reference in footnote 12 on page E-14, this should be 40 CFR Part 125.58(p). In addition, Table E-10 does not identify the organophosphate pesticides to be monitored in the sediment. The OP pesticides to be monitored in the sediment include those OP pesticides included in 40 CFR Part 125.58(p).
- 11.** The IWC in the adopted permit was accidentally carried over from the previous permit; however, the 1.6% IWC needs to be used until the requirement can be revised in the amendment.
- 12. MRP Section IV.A, page E-12, Table E-2 and Section V.A, page E-14, Table E-3.** Total Chromium is included as a grab sample in Table E-3 under “Remaining Priority Metals” but total chromium is currently listed as a 24-hour composite in Table E-2. This will be addressed in the amendment but for now total chromium should be sampled as a grab for the effluent and a 24-hr composite for the influent.
- 13. MRP Section IX.B.1, page E-24.** Monitoring station HW-07 should have been removed from the MRP along with CB1 and CB2 because the stations are currently being monitored as part of the Municipal Separate Storm Sewer System (MS4) permit issued to the City. Since this monitoring requirement was removed, any reference to CB1, CB2, or HW07 should be removed for consistency. This will be addressed in the amendment, but until then the monitoring results for HW07 must be reported. Monitoring at this location does not need to be duplicated since it is being monitored by another city department, but the results do need to be reported in the NPDES compliance report until the amendment is adopted.
- 14. MRP Section IX.D.1, page E-27, Table E-9.** The correct chronic toxicity sampling locations are listed in Section III of the MRP, Table E-1. Table E-9 includes the old stations; however, the intention was to monitor at the new sampling locations. Please use the locations as listed in Table E-1 as those were the intended toxicity monitoring locations. This will be addressed in the amendment.
- 15. MRP Section IX.E.1, page E-28, Table E-10.** The following compounds may be reported in µg/kg, but for now they must also be reported in mg/kg: aldrin, dieldrin, endrin, hexachlorocyclohexane, chlordanes (A-chlordane, G-chlordane, Cis-nonachlor, trans-nonachlor, oxychlordane), DDT derivatives, total PCBs, PCB derivatives, and toxaphene. This will be addressed in the amendment.
- 16. MRP Section IX.E.1, page E-28, Table E-10, and Section V.A, page E-13, Table E-3.** In Table E-10, “Total PCBs” for the sediment monitoring refers to the same parameters that are listed in Table E-3 as “PCBs as congeners” for the final effluent monitoring. In addition, “PCB Derivatives” in Table E-10 includes the same PCBs listed as “PCBs as aroclors” in Table E-3. PCB Derivatives and PCB congeners are clearly defined in the Order; however, “Total PCBs” in Table E-10 can be misleading since it only includes congeners. This will be addressed in the amendment.

17. MRP Section V.A, page E-13, Table E-3. The Order contains an annual final effluent limitation for Total PCBs. PCBs as congeners have an annual monitoring requirement, while Total PCBs have a different monitoring frequency. Since PCBs as congeners are a component of Total PCBs, it is not possible to calculate Total PCBs on a monthly basis. This will be addressed in the amendment.

18. WDR Section IV.A, page 6, Table 4, & MRP Section V.A, page E-14, Table E-3. The final effluent limitation and monitoring for “2,3,7,8-TCDD (Dioxin)” should be “2,3,7,8-TCDD equivalents” because compliance with this limit is determined using the equivalence approach described in Section VII.O, page 30 of the Order. This will be addressed in the amendment but it should be understood when monitoring for 2,3,7,8-TCDD, the equivalents should also be monitored.

Steven Webb

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Attachment D

Webb, Steven J.@Waterboards

From: Abraham Razon <abraham.razon@lacity.org>
Sent: Tuesday, August 11, 2015 11:42 AM
To: Webb, Steven J.@Waterboards
Cc: Hassan Rad; Farhana Mohamed; Kay Yamamoto; DANIEL PIERCE; Mark Starr
Subject: Re: NPDES Amendment Staff Working Draft Terminal Island CI 2171
Attachments: EMD Additional Comments and RWQCB Response in Draft Amendment.doc; Phenols 2004-2015 + Trichloroethene, Toluene and PCE 2010-2015.xls; LAH WQ NO HW07.PDF; LAH Micro NO HW07.PDF

Hi Steven,

Attached is the latest comments from EMD after reviewing the "Staff Draft Amendment", which was emailed on 8/5/15. In addition to the original comment, EMD included four additional comments. They are listed #21 to #24 in the attached comment matrix . Also attached are the: 1) excel spreadsheet for Comment #23 and the 2) updated maps for LAH Water Quality Stations and LAH Microbiology Stations. Please review and let me know if you have any questions.

On Wed, Aug 5, 2015 at 12:02 PM, Webb, Steven J.@Waterboards <Steven.Webb@waterboards.ca.gov> wrote:

Attention: City of Los Angeles Staff

Attached is a staff working draft of the National Pollutant Discharge Elimination System Amendment for the Terminal Island Water Reclamation Plant. Do not distribute. This draft is currently being reviewed by the Environmental Protection Agency and the legal team for the Regional Water Board, and may be revised as needed.

Please note that the staff working proposal neither constitutes a "draft permit" nor a "proposed permit" as defined in 40 CFR section 122.2 or 124.6. Further, distribution of the staff working proposal for City of Los Angeles staff review and discussion does not constitute a public comment period pursuant to 40 CFR sections 124.10 or 124.17. Accordingly, while staff will accept and consider suggested redline revisions until 5:00 p.m. on Wednesday, August 12, 2015, staff does not intend to formally respond to the suggested redline revisions or other comments on the staff working proposal of the revised permit.

Staff expects to release a tentative amendment for public review and comment by August 19, 2015. City of Los Angeles staff may, of course, provide written comments at that time and staff will respond to comments as required by federal regulations.

Respectfully,

Steven Webb

Water Resource Control Engineer

Regional Water Quality Control Board

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[\(213\) 576-6793](tel:(213)576-6793)

Steven.Webb@Waterboards.ca.gov

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Abraham Razon
Environmental Engineer
Regulatory Affairs Division, Bureau of Sanitation
City of Los Angeles
Tel. No. 213-485-0577

2015 TIWRP NPDES Additional Permit Comments and RWQCB Response

Comment #	Document Reference (Doc. #, Page #, Section # Paragraph #)	Issue	LASAN Comments (July 13, 2015)	Regional Water Board Response "Staff Working Draft" (August 5, 2015)	LASAN Additional Questions/Comments (August 12, 2015)
1	WDR, Effluent Limitations Table 4, Page 7 MRP Table E-3, Page E-13	Definitions needed for Total PCBs, DDTs, and PAHs with a parameter list.	<p>The Total PCBs, Total DDTs, and Total PAHs for the Mass-Based Effluent Limitations on Page 7 of the Order and also on Table E-3 on page E-13 should be defined clearly with a parameter list.</p> <p>The new Permit is using the terms for PCBs and PAHs differently than in any previous or other NPDES permits.</p>		This has been clarified by other responses of the Regional Board in their "Staff Working Draft Amendment."
2	WDR, Page 28-29, item J. MRP, Page E-16, item 1.	Correction to IWC needed	The approved dilution credit is 65. The new Permit still shows the incorrect IWC of 1.6% effluent (for 1/62) on Page 29, item J of the Order and also on Page E-16, item 1. The IWC should be corrected to 1.5% (for 1/66).	<p>Board's staff agreed. Amendments will be made in the permit.</p> <p>The approved dilution ratio is 65:1, as stated in Section I.F. of the Fact Sheet ; however, the in-stream waste concentration (IWC) described in the Order is not consistent with this dilution ratio. The IWC is calculated by dividing 1 by the dilution ratio plus 1. The previous permit included an IWC of 1.6%, which is the result of dividing 1 by 62, since the dilution ratio was previously 61:1. Order No. R4-2015-0119 incorrectly carried over the IWC from the previous permit. The correct IWC is calculated by dividing 1 by 65 plus 1, which is 1.5%.</p>	
3	MRP, Table E-2, Page E-12 and Table E-3, Page E-14	Correction needed for Chromium sample type. Needs to be "grab" sample type.	The influent and effluent monitoring tables list remaining EPA priority pollutants as a 24-hr composite and a grab for VOCs and Chromium VI. Chromium, which falls under the priority pollutant category, needs to be specified as a grab as well. Otherwise, chromium will be analyzed on a 24-hr	<p>Board's staff agreed. Amendments will be made in the permit.</p> <p>Total chromium is included as a grab sample for final effluent monitoring in Table E-3 under "Remaining Priority Metals" but total chromium is currently listed as a 24-hour composite for influent</p>	Good for Influent Monitoring -- page E-12, Table E-2. – DLP However, in the Adopted Order 6-11-15, for Effluent Monitoring page E-14, Table 3, it simply states "grab/24-hour composite" for Remaining EPA

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			composite sample type. The chromium sample type should be corrected to “grab”.	monitoring in Table E-2. Table E-2 shall read as follows for the “Remaining EPA priority pollutants excluding asbestos”:	Priority Pollutant Metals. It should be more specific and state "24-hour composite; grab for Total Chromium"
4	MRP, Table E-3, Page E-14 MRP, Table E-10, Page E-28	Pesticides	The names of the parameter should be consistent. Change “Pesticides” in Table E-3, Page E-14 to “Orthophosphate (OP) Pesticides” as listed in Table E-10, Page 28.	Board’s staff agreed. Amendments will be made in the permit. The pesticides to be monitored in table E-3 and E-10 are identical; however, the parameter name is listed differently in both tables. For consistency, the parameter name for “Organophosphate Pesticides” shall be “Pesticides,” and footnote 12 shall be included in Table E-10.	
5	MRP, Page E-24, item B.1.	Remove HW-07 as it is monitored under the MS4 permit.	HW-07 should not have been included as it is part of the MS4 permit. Inner Cabrillo Beach shoreline stations CB1 and CB2 and Main Ship Channel site HW07 are monitored under the 2012 Municipal Separate Storm Sewer System (MS4), LA Harbor Bacteria TMDL, however, only CB1 and CB2 have been removed from the 2015 TIWRP Permit.	Board’s staff agreed. Amendments will be made in the permit. Monitoring stations CB1, CB2, and HW-07 were removed from the MRP because the stations are currently being monitored as part of the Municipal Separate Storm Sewer System (MS4) permit issued to the City. Since this monitoring requirement was removed, any reference to CB1, CB2, or HW07 should be removed for consistency. For consistency, references to HW07 shall be removed from the Order as follows:	
6	MRP, Table E-9, page E-27	Chronic Toxicity Stations	The new Permit still has the old stations HW24 and HW43 listed in Table E-9. The new chronic toxicity monitoring stations are HW62 and HW20. Correct the chronic toxicity stations in Table E-9	Board’s staff agreed. Amendments will be made in the permit. The correct chronic toxicity sampling locations are listed in Section III of the MRP, Table E-1. However, Table E-9 included the old stations. For consistency, MRP Section IX.D.1, Table E-9 shall be corrected to read as follows:	

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7	MRP, Table E-10 on page E-28	Correction needed to reporting units for data management purposes. Historical NPDES reporting units were as specified in the comment.	The reporting units on the sediment organic compounds have not been corrected per submitted comments. Phenolic, chlorinated hydrocarbons, and PAH derivative compounds reporting units are OK as mg/Kg. Pesticides and PCBs should have a reporting unit of ug/Kg in order for our databases to manage these data. Here is a listing of constituents that should be reported in ug/Kg: Aldrin, Dieldrin, Endrin, Hexachlorocyclohexane, Chlordanes (A-Chlordane, G-Chlordane, Cis-Nonachlor, Trans-Nonachlor, Oxychlordane), DDT derivatives, Total PCBs, PCB derivatives, & Toxaphene.	Board’s staff agreed. Amendments will be made in the permit. The City has requested that several parameters in Table E-10 be reported in µg/L to make it consistent with the previous permit and to be compatible with the City’s current databases that manage the data.	Note that the original list of constituents to be reported in ug/Kg should now include Heptachlor and Endosulfan which have been added.
8	MRP, Table E-10, Page E-29	Chlorinated Hydrocarbons	Request the Board to specify the Chlorinated Hydrocarbons compound list. 40 CFR, Part 136, Method 612, defines the Chlorinated Hydrocarbons as including 9 compounds: 2-Chloronaphthalene, 1,2-Dichlorobenzene, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, Hexachlorobenzene, Hexachlorobutadiene, Hexachlorocyclopentadiene, Hexachloroethane, and 1,2,4-Trichlorobenzene.	Board’s staff agreed. Amendments will be made in the permit. The required chlorinated hydrocarbons that shall be monitored for compliance are not identified in Table E-10 and include aldrin, dieldrin, endrin, chlordane, heptachlor, and endosulfan. Heptachlor and endosulfan are the only chlorinated hydrocarbons not yet included in Table E-10 so the “Chlorinated Hydrocarbons” category shall be removed and “Hepatchlor” and “Endosulfan” shall be added to Table E-10.	Question: Does Heptachlor include Heptachlor epoxide, or simply the single compound Heptachlor? Question: Does Endosulfan mean Endosulfan I, Endosulfan II, Endosulfan II Sulfate, or all three of them?
9	MRP, Table E-10, Page E-28 MRP Table E-3, Page E-13	Total PCB	Request the Board to change “Total PCB” to “PCB as congeners” based on the Table E-10, Page E-28, Footnote 26 which defines it as 41 PCB congeners. In Table E-3, Page E-14, Footnote 11, the same 41 PCB congeners are listed as “PCBs as congeners”. Both footnotes 11 and 26 should be consistent.	Board’s staff agreed. Amendments will be made in the permit. In Table E-10, “Total PCBs” for the sediment monitoring refers to the same parameters that are listed in Table E-3 as “PCBs as congeners” for the final effluent monitoring. In addition, “PCB Derivatives” in Table E-10 includes the	

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				same PCBs listed as “PCBs as aroclors” in Table E-3. “Total PCBs” shall be modified to read “PCBs as congeners”, and “PCB Derivatives” shall be modified to read “PCBs as aroclors” in table E-10.	
10	MRP, Table E-10, Page E-28 & Table E-3, Page E-13	Total DDT	Request the Board to revise Footnote #25 to Table E-10 define total DDT as the sum of 4,4’DDT, 2,4’-DDT, 4,4’-DDE, 2,4’-DDE, 4,4’-DDD, and 2,4’DDD. To be consistent with the Total DDTs in Table E-10, we are suggesting adding a footnote Table E-3, Page E-13 which defines total DDT as the sum of 4,4’DDT, 2,4’-DDT, 4,4’-DDE, 2,4’-DDE, 4,4’-DDD, and 2,4’DDD, be added for Table E-3.	Board’s staff agreed. Amendments will be made in the permit. “DDT Derivatives” refers to each DDT compound that shall be reported individually, whereas “Total DDT” refers to the sum of all “DDT Derivatives”. “Total DDT” is not defined in Table E-3 but the constituents to be monitored shall be consistent with the CCMRP, as clarified in modification #9 of this amendment. Total DDT is also not defined in Table E-10 so for clarity, Table E-10 shall specify that “Total DDT” is the sum of all “DDT Derivatives.”	
11	MRP, Table E-10, Page E-28 & Table E-3, Page E-13	PCB derivatives	Request the Board to change “PCB derivatives” to “PCBs as aroclors” to be consistent with the definition for effluent in the last row of Table E-3, on page E-13. Table E-10, Page E-28, Footnote 27 defines it as 7 Aroclors, by EPA method 608	Board’s staff agreed. Amendments will be made in the permit. In Table E-10, “Total PCBs” for the sediment monitoring refers to the same parameters that are listed in Table E-3 as “PCBs as congeners” for the final effluent monitoring. In addition, “PCB Derivatives” in Table E-10 includes the same PCBs listed as “PCBs as aroclors” in Table E-3. “Total PCBs” shall be modified to read “PCBs as congeners”, and “PCB Derivatives” shall be modified to read “PCBs as aroclors” in table E-10.	
12	MRP, Table E-10, Page E-29	Total PAH	Request the Board to specify the Total PAH list and the definition of High and Low Molecular Weight PAHs. Usually the high molecular weight PAHs are	Board’s staff agreed. Amendments will be made in the permit. For the purposes of water quality monitoring, “Total PAHs” shall be consistent with the approved CCMRP, as	There is no requirement in the TIWRP Permit for "water quality monitoring" of PAHs. Maybe the first sentence was intended to say "For the purposes of

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			<p>defined as having four or more aromatic rings and the low molecular weight PAHs as having three or fewer aromatic rings. Based on the list (MRP, Table E-10, footnote 29, page E-29), there are 13 PAHs. Out of these 13 PAHs, 4 (Acenaphthylene, Anthracene, Fluorene, and Phenanthrene) belong to low molecular weight group and 9 (Benz(a)anthracene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Benzo(g,h,i) perylene, Benzo(a)pyrene, Chrysene, Dibenzo(a,h)anthracene, Indeno(1,2,3-cd)pyrene and Pyrene) belong to high molecular weight group.</p>	<p>clarified in modification #9 of this amendment. For the purposes of sediment monitoring, "Total PAH" shall include the sum of the "PAH Derivatives" defined in Appendix I of the 2012 California Ocean Plan and listed in footnote 29, Table E-10, page E-29.</p>	<p>Effluent monitoring..."</p>
13	MRP, Table E-10, Page E-28	Orthophosphate (OP) Pesticides"	<p>Request the Board to specify the OP compound list. Sediment OP Pesticides on page E-28, Table 10, should be the same as "Pesticides" for effluent EFF-001, in Table E-3 on Page E-14, Footnote 12, Pesticides are, six constituents referred to in 40CFR, part 125.58(m): demeton, guthion, malathion, methoxychlor, mirex, and parathion.</p>	<p>Board's staff corrected the section of 40 CFR Part 125.58. Amendments will be made in the permit. Table E-3 of the MRP identifies the pesticides to be monitored as those six constituents referred to in 40 CFR 125.58(m); however, 40 CFR 125.58(m) refers to industrial processes and the correct reference is 40 CFR 125.58(p). Footnote 12 on page E-14 of the MRP shall read as follows: Pesticides are, for the purposes of this order, those six constituents referred to in 40 CFR, Part 125.58(p) (demeton, guthion, malathion, methoxychlor, mirex, and parathion).</p>	<p>Good for page E-14, Table E-3, Footnote 12. However, note that page E-12, Table E-2, Footnote 3 also refers to 40 CFR 125.58(m). – DLP</p>
14	MRP, Table E-1, Page E-8	Sediment monitoring program	<p>For Harbor Toxics Stations listed as Station ID#8 and ID#9. Do we need to perform any monitoring for these? No monitoring specifications are present.</p>	<p>Board's staff made the following clarification:</p>	
15	MRP, Table E-1, Page E-8, and Pages	Sediment monitoring program	<p>Need clarification about effects the Harbor Toxics TMDL has on our routine sediment</p>	<p>The Harbor Toxics sampling stations come from the CCMRP. The City must monitor the receiving waters as required</p>	

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	E-34, & E-36		monitoring program.	in Order No. R4-2015-0119 and in the approved CCMRP. If any of the sample locations and monitoring requirements between this Order and the CCMRP are identical, the monitoring requirements do not need to be duplicated. In this case, the sampling results may be submitted in both the CCMRP and NPDES reports, in lieu of duplicative monitoring. There are two separate monitoring and reporting requirements related to the CCMRP in the Order. The City is required to conduct all monitoring and reporting for all stations in the CCMRP, and submit the final report no later than March 03, 2016. The city is also required to conduct all monitoring and reporting for Harbor Toxics TMDL Sampling Stations ID #8 and #9, and submit the results from these two stations in the NPDES compliance reports.	
16	MRP, page E-28	LAH sediment monitoring for Acid Volatile Sulfides	Requesting initiating monitoring of Acid Volatile Sulfides by early 2016 as the method needs to be developed and certified.	Compliance with the acid volatile sulfide sediment monitoring requirement is effective on the effective date of the permit and shall be monitored once during the 2015 calendar year. If the in-house laboratory is not certified to conduct the analysis, the samples may be sent out to a contract lab for analysis.	Since the annual sediment sampling for this year occurred already in July 2015, and based on the Regional Board's staff's response of item #17, the previous permit (Order R4-2010-0071) is in effect, the request for additional time for method development and certification is a moot point. However, LASAN would request clarification regarding the Regional Board staff's comment, "... shall be monitored once during the 2015 calendar year. " It seems that this comment is

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					not correct based on item #17.
17	MRP, Table E-13, page E-37-38	Quarterly, semiannual, and annual monitoring implementation dates	Need to get Board's understanding that the first TI new permit quarterly monitoring will be in October-December 2015, the semiannual monitoring will occur in January-March 2016, and the annual monitoring will occur on July 1-September 30, 2016, as the "or on" language makes the implementation date unclear.	Board's staff made the following clarification: If quarterly, semiannual, or annual monitoring has not been completed by the effective date of Order No. R4-2015-0119, and the Monitoring Period for this Order begins on a date following the effective date of the permit, the monitoring requirements in Order R4-2010-0071 apply. For the monitoring period from July 1 to September 30, 2015, the quarterly, semiannual, and annual monitoring requirements in Order R4-2010-0071 shall be effective.	
18	WDR, Page 7, Footnote 9 MRP, Page E-13, Table E-3	About mass loading limitations not going into effect until 2018	City is seeking clarification from Regional Board if there is an agreement about holding off on Harbor Toxics TMDL effluent mass-based limits until 2018. Footnote 9 on Page 7 is not definitive about whether the limits in the Permit are currently in effect or not. The permit footnote should state it plainly. In addition, if the limits are not effective until 2018, when will the monthly effluent monitoring requirement for copper, lead, zinc, Total PAH, Total DDT and Total PCBs be effective?	Board's staff agreed. Amendments will be made in the permit. For final effluent monitoring requirements and for the final effluent limitations that serve to ensure compliance with the Harbor Toxics Total Maximum Daily Load (TMDL) Waste Load Allocations (WLAs), such as Total PCBs, DDTs, and PAHs, the City shall refer to the Coordinated Compliance Monitoring and Reporting Plan (CCMRP) approved by TMDL staff of the Regional Water Board on June 06, 2014, and any subsequent revisions as approved by the Executive Officer. Tables 17 and 18 of the CCMRP (see attachments for reference in this amendment only) list the constituents that shall be monitored for compliance with Total PCBs, PAHs, and DDTs.	The NPDES permit Effluent monitoring is related to the Harbor Toxics TMDL, and the Harbor Toxics CCMRP requires the mass-based results that are reported as both a monthly average and a running annual average; therefore, the monthly monitoring of effluent for TMDL target pollutants is typical for this permit period.

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				<p>In addition, the monitoring for copper, lead, zinc, Total PAH, Total DDT, and Total PCBs shall begin on the effective date of the Order. Since these final effluent limitations do not take effect immediately, monitoring for these parameters shall be quarterly until the final effluent limitations do take effect; at which point the monitoring shall be as listed in Table E-3. The effective date of the TMDL WLA-based final effluent limitations, for the pollutants listed above, is contingent on the reconsideration of the Harbor Toxics TMDL WLAs as well as the outcome of the special studies approved by the Executive Officer.</p>	
19	MRP, Table E-3, Page E-13	Total PCB's, PCBs as Aroclors, PCBs as congeners	Seeking clarification why Total PCBs is monthly, PCBs as aroclors is quarterly, and PCBs as congeners is annually, when PCBs as aroclors and as congeners are component of the Total PCBs.	<p>Board's staff agreed. Amendments will be made in the permit.</p> <p>The Order contains an annual final effluent limitation for Total PCBs. PCBs as congeners have an annual monitoring requirement, while Total PCBs have a different monitoring frequency. Since PCBs as congeners are a component of Total PCBs, it is not possible to calculate Total PCBs on a monthly basis. Table E-3 shall read as follows for Total PCBs:</p>	<p>For Effluent Monitoring requirements on page E-13, Table E-3, according to Footnote 9, the requirement for monitoring Total PCBs is necessary to comply with the Harbor Toxics TMDL WLA. However, the Harbor Toxics CCMRP does not require the monitoring of Total PCBs. It only requires monitoring of PCB Congeners -- see compliance monitoring program for water and sediment on Page ES-6, and tissue on Page ES-7, as well as Table 16 (Parameters to be Monitored), and Table 17 (Water Parameters), Table 18 (Sediment Parameters) and</p>

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					Table 19 (Tissue Parameters). In all cases, the monitoring and reporting requirements of the Harbor Toxics CCMRP only specify PCB Congeners, and not Total PCBs, nor PCB as arochlors, nor simply PCBs. -DLP
20	WDR, Table 4, Page 6	2,3,7,8 TCDD (Dioxin)	The permit should state 2,3,7,8-TCDD Equivalents in Table 4 and Table E-3.	<p>Board’s staff agreed. Amendments will be made in the permit.</p> <p>The final effluent limitation and monitoring for “2,3,7,8-TCDD (Dioxin)” should be “2,3,7,8-TCDD equivalents” because compliance with this limit is determined using the equivalence approach described in Section VII.O, page 30 of the Order. Table 4 of the WDR and Table E-3 of the MRP shall read as follows for 2,3,7,8-TCDD Equivalents:</p>	Good -- although there could be a footnote referencing Section VII.O, page 30.
21	MRP, Table E-10, Page E-29	Required Analytical Test Method and Minimum Level	Table E-10 of the permit did not specify the required analytical test method and Minimum Level as was done in Table E-3. We request to add a column “Required Analytical Test Method and Minimum Level” to Table E-10 to clarify that the updated EPA methods could be used and make Table E-10 consistent with Table E-3.		Add a note after Note 31, as Note 32, which notes that “Pollutants shall be analyzed using the analytical methods for solids analysis as described in the USEPA SW-846 update V of 2013; where no methods are specified for a given pollutant, by methods approved by this Regional Board or State Water Resources Control Board. For any pollutant whose TMDL limitation is lower than all minimum levels (MLs) specified in Attachment 4 of the SIP, the analytical method with the lowest ML must be selected.

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					Note 32 will be applicable to constituents of Table E-10 except Acid Volatile Sulfides, Ammonia Nitrogen, Dissolved Sulfides, TOC, and Grain size.
22	MRP, Table E-3, Page E-14	Typo			Tributyltin should be Tributyltin
23	WDR, page 6, footnote 5.	Where is the LAH receiving water station location for dioxin?			The TI permit states that quarterly Los Angeles Harbor receiving water may be analyzed for high res dioxin for one year by the City in order to have the Board consider applying a dilution credit to the limit of 0.014 pg/L. However, the TI permit does not specify the receiving water station location. Where is the LAH receiving water station location for dioxin?
24	Fact Sheet, Pages F-9 through F-12, item C., Table F-2 and Page F-37, Table F-6.	Influent data were used in Table F-2 and F-6 for 2-chlorophenol, 2,4-dimethylphenol, and Phenol and October 2009 effluent data were used for Tetrachloroethylene, Toluene, and Trichloroethylene			On page F-9, item C. the effluent monitoring data from 1/1/2010 to 9/30/2014 is supposed to be represented in Table F-2; however, it appears some of the listed detected data are incorrect. Attached is an Excel file showing the data of the parameters where no detects were found. We request removal of the following parameters from the Fact Sheet Table F-2 on pages F-11-F-12 and from Table F-6 on page F-37. Also, it appears on

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		e.			page F-37 that influent data was used: Tetrachloroethylene, Toluene, Trichloroethylene, 2-chlorophenol 2,4-dimethylphenol, and Phenol.
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Make sure any changes to monitoring frequencies are reflected in the Fact Sheet, Table F-9 -- Effluent Monitoring Frequency Comparison.

Terminal Island Water Reclamation Plant Final Effluent Data 2004-2015

Date*	TITP:OPS:FINAL EFFLUENT PHENOL LEGAL SCHEDULED ORIGINAL UNITS - ug/L CONVERSION FACTOR - 1	TITP:OPS:FINAL EFFLUENT 2-CHLOROPHENOL SCHEDULED ORIGINAL UNITS - ug/L CONVERSION FACTOR - 1	TITP:OPS:FINAL EFFLUENT 2,4-DIMETHYLPHENOL SCHEDULED ORIGINAL UNITS - ug/L CONVERSION FACTOR - 1	Date*	TITP:OPS:FINAL EFFLUENT TRICHLOROETHENE SCHEDULED ORIGINAL UNITS - ug/L CONVERSION FACTOR - 1	TITP:OPS:FINAL EFFLUENT TOLUENE SCHEDULED ORIGINAL UNITS - ug/L CONVERSION FACTOR - 1	TITP:OPS:FINAL EFFLUENT TETRACHLOROETHENE SCHEDULED ORIGINAL UNITS - ug/L CONVERSION FACTOR - 1
				01/05/10	<0.140	<0.090	<0.160
02/01/04	<0.40	<0.09	<0.17				
				04/01/10	<0.140	<0.090	<0.160
05/01/04	<0.40	<0.09	<0.17				
08/01/04	<0.40	<0.09	<0.17				
				08/26/10	<0.140	<0.090	<0.160
				10/05/10	<0.140	<0.090	<0.160
11/02/04	<0.40	<0.09	<0.17				
				01/04/11	<0.140	<0.090	<0.160
02/01/05	<0.40	<0.09	<0.17				
				04/04/11	<0.140	<0.090	<0.160
05/01/05	<0.40	<0.09	<0.17				
07/01/05	<0.40	<0.09	<0.17				
				07/07/11	<0.160	<0.150	<0.090
08/18/05	<0.40	<0.09	<0.17				
				10/01/11	<0.160	<0.150	<0.090
10/11/05	<0.40	<0.09	<0.17				
				01/04/12	<0.160	<0.150	<0.090
01/09/06	<0.40	<0.09	<0.17				
04/01/06				04/01/12	<0.160	<0.150	<0.090
04/03/06	<0.40	<0.09	<0.17				
07/01/06	<0.40	<0.09	<0.17				
10/01/06	<0.40	<0.09	<0.17	07/01/12	<0.160	<0.150	<0.090
01/03/07	<0.40	<0.09	<0.17	10/01/12	<0.160	<0.150	<0.090
04/02/07	<0.40	<0.09	<0.17	01/03/13	<0.120	<0.150	<0.190
07/01/07	<0.40	<0.09	<0.17	04/02/13	<0.160	<0.150	<0.090
10/04/07				07/01/13	<0.160	<0.150	<0.090
10/10/07	<0.40	<0.09	<0.17	10/04/13	<0.160	<0.150	<0.090
01/02/08	<0.40	<0.09	<0.17				
				01/06/14	<0.160	<0.150	<0.090
04/01/08	<0.40	<0.09	<0.17				
				04/05/14	<0.160	<0.150	<0.090
				07/01/14	<0.160	<0.150	<0.090
07/01/08	<0.40	<0.09	<0.17				
10/01/08	<0.40	<0.09	<0.17	10/02/14			
				10/05/14	<0.160	<0.150	<0.090
01/02/09	<0.20	<0.26	<0.18				
				01/05/15	<0.160	<0.150	<0.090
				04/01/15	<0.160	<0.150	<0.090
04/02/09	<0.40	<0.09	<0.17				
				07/06/15	<0.160	<0.150	<0.090
07/08/09	<0.40	<0.09	<0.17				
10/01/09	<0.40	<0.09	<0.17				
01/05/10	<0.40	<0.09	<0.17				
04/01/10	<0.40	<0.09	<0.17				
07/01/10	<0.40	<0.09	<0.17				
10/05/10	<0.25	<0.22	<0.24				
01/04/11	<0.25	<0.22	<0.24				
04/04/11	<0.25	<0.22	<0.24				
07/06/11	<0.25	<0.22	<0.24				
10/01/11	<0.25	<0.22	<0.24				
01/04/12	<0.25	<0.22	<0.24				
04/01/12	<0.32	<0.24	<0.22				
07/01/12	<0.25	<0.22	<0.24				
10/01/12	<0.32	<0.24	<0.22				
01/01/13	<0.32	<0.24	<0.22				
04/03/13	<0.32	<0.24	<0.22				
07/01/13	<0.25	<0.22	<0.24				
10/04/13	<0.28	<0.25	<0.23				
01/06/14	<0.32	<0.24	<0.22				
04/05/14	<0.25	<0.22	<0.24				
07/01/14	<0.32	<0.24	<0.22				
10/05/14	<0.32	<0.24	<0.22				
01/05/15	<0.32	<0.24	<0.22				
04/01/15	<0.95	<1.05	<0.94				
07/06/15	<0.95	<1.05	<0.94				

* Only dates on which final effluent data was generated were included in this table.



