

UPPER LOS ANGELES RIVER AREA WATERMASTER

CITY OF LOS ANGELES VS. CITY OF SAN FERNANDO, ET AL
CASE NO. 650079 – COUNTY OF LOS ANGELES

MELVIN L. BLEVINS – WATERMASTER

OFFICE LOCATION:
111 North Hope Street, Room 1463
Los Angeles, CA 90012
TELEPHONE: (213) 367-1020
FAX: (213) 367-1131

MAILING ADDRESS:
ULARA WATERMASTER
P.O. Box 51111, Room 1463
Los Angeles, CA 90051-0100

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UPPER LOS ANGELES RIVER AREA
WATERMASTER
QUALITY CONTROL BOARD
LOS ANGELES REGION

Mr. Donald Froelich
Water Services Administrator
City of Glendale
141 N. Glendale Avenue
Glendale, CA 91206

Dear Mr. Froelich:

Glendale OU Discharges of Treated Groundwater

This letter is in response to the City of Glendale's request of October 11, 2000 to use the Basin Account Groundwater for the Glendale OU discharges of treated groundwater. I am aware that the Glendale City Council has made a decision to request that the U. S. Environmental Protection Agency (USEPA) delay by 90 days the delivery of treated groundwater from the new Glendale OU to the City and that USEPA has approved this request. I also understand that the treated water is currently being discharged into the storm drain to the Los Angeles River. This water does not fall into the category of development water before September 25, 2000, when the system was being tested in anticipation of start-up. The development water is a separate issue addressed in an earlier letter. The total groundwater pumped during August and September 2000 amounts to 1,018 AF. Most of this groundwater would be charged to the Basin Account.

Many years ago, I recorded my opposition to treat and discharge water when the concept was proposed for the Burbank OU. My opinion has not changed. It is also my opinion that the Court may view this as wasteful. After the 90-day test period (September 26, through December 24, 2000), the water should be treated and served, or the facility should be shut down while the debate on chromium levels continues. Furthermore, there may be difficulty in discharging even this treated water in view of the Federal Register (May 2000) limiting the discharge of water to the river with levels of total chromium equal to or greater than 11 ppb.

These past few weeks have been full of confusion. It may take years before the issues surrounding the hexavalent chromium maximum contaminant levels (MCL) or Public Health Goal (PHG) are resolved. In the meantime, there will be other

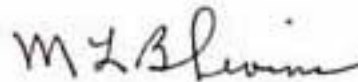
November 2, 2000

contaminants that will be able to be detected in ever-decreasing increments possibly resulting in lower MCLs. As Watermaster, I am concerned with the management of the basins within ULARA. It is wasteful to discharge treated groundwater, and I can not support any activity in that direction, nor do the Judgment or Policies and Procedures allow me to support debiting the Basin Account in this event. The discharged water should be deducted from Glendale's Stored Credits.

On November 17, 2000, I will be making my Quarterly Watermaster Status Report to Judge Susan Bryant-Deason. I will indicate my serious opposition to the Glendale OU pumping to waste the treated groundwater, after this 90-day test period. As Watermaster, I want the Glendale OU shut down, if the water is not served to the City.

If you have any questions, please call me. We can also discuss this during the next meeting of the Administrative Committee.

Sincerely,



MELVIN L. BLEVINS
ULARA Watermaster

c: Judge Susan Bryant-Deason

Administrative Committee Members

Mr. Fred Lantz, City of Burbank
Mr. Michael Sovich, Crescenta Valley
Water District
Mr. Michael Drake, City of San Fernando
Mr. Thomas M. Erb, City of Los Angeles

Mr. Loren Henning, USEPA
Mr. David Stensby, USEPA
Mr. Dennis Dickerson, LARWQCB ✓

Watermaster Staff

Mr. Melvin L. Blevins, Watermaster
Mr. Frederic Fudacz, Special Counsel
Mr. Mark G. Mackowski, Assistant
Watermaster
Ms. Patricia T. Kiechler, Administrator