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September 30, 2015



Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear Ms. Townsend:

Subject: Comment Letter – San Gabriel River (SGR)
Bacteria Total Maximum Daily Load (TMDL)

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments on the proposed SGR Bacteria TMDL resolution. LADWP supports the SGR Bacteria TMDL. The TMDL provides a balanced approach to dealing with the sources of bacteria in the SGR and provides a mechanism to apply to those sources which are significant contributors. By focusing compliance on those sources that impact the SGR, the maximum benefit can be achieved.

LADWP's Haynes Generating Station (HnGS) discharges its process wastewater and once-through cooling water into the SGR located in Long Beach. Since 2008, HnGS has been doing its part by removing the sanitary waste component from the process wastewater discharges. LADWP began the process of redirecting this waste stream to the sanitary sewer in 2008 and in 2012, a final permanent connection to the Long Beach sanitary sewer was completed. Presently, all sanitary waste from the facility is discharged directly to the sanitary sewer.

With the recent (September 10, 2015) adoption of the AES Alamitos Generating Station permit, which occurred after the Los Angeles Regional Water Quality Control Board (RWQCB) adopted the San Gabriel River Bacteria TMDL, LADWP has become aware that there may be various ways of interpreting the TMDL and applying it within National Pollutant Discharge Elimination System (NPDES) permits. Upon review of the TMDL, LADWP had concerns regarding background concentrations already present in the source water that may show as a significant source in the Reasonable Potential Analysis (RPA). LADWP has the following specific comment on the proposed SGR Bacteria TMDL.

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LADWP agrees with the premise that non-MS4 dischargers are not expected to be a significant source of bacteria to the SGR. Providing a mechanism for these facilities

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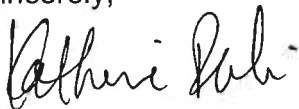
to show through an RPA that the discharges from their facilities do not contain significant levels of bacteria is an effective means to monitor and analyze only those discharges that may pose a threat to the SGR.

LADWP supports the State Board in that facilities that do not contribute bacteria due to a process and/or activity at the site should have the opportunity to show that they are not a source through the RPA process. However, should bacteria monitoring be included in the NPDES permit, these facilities should be responsible only for those bacteria concentrations contributed to the water as it passes through their facility processes. Facilities whose primary function is unaffiliated with the aggregation and treatment of stormwater, urban runoff, or wastewater should not be liable for the bacterial contributions of others beyond the facility's control. This would address the clear distinction between the various discharges to the SGR.

For this reason, LADWP requests that the State Board clarify in its adopting resolution that facilities that do not have a specific bacteria source be allowed relief for background concentrations beyond the facility's control - not related to the facility's activities or processes.

In closing, the LADWP appreciates the opportunity to provide these comments and looks forward to working with the Regional and State Board staff in implementing the Bacteria TMDL for the SGR. For questions or additional information, please contact Mr. Michael Hanson of my staff at (213) 367-0634.

Sincerely,



Katherine Rubin
Manager of Wastewater Quality and Compliance

MH:mg

c: Ms. Felicia Marcus, Chair, State Water Resources Control Board
Ms. Frances Spivy-Weber, Vice Chair, State Water Resources Control Board
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