

Item # 12
Response to Comments
Newhall Ranch Sanitation District
Newhall Ranch Water Reclamation Plant (WRP)
Tentative NPDES Permit

(This Table summarizes the comments received from interested parties with regard to the above-mentioned facility's Tentative Permit [dated September 30, 2013]. Each comment presented in this Table has corresponding Regional Water Board's response and/or action taken.)

Issue	#	Section	Comment	Response	Action Taken
Toxicity accelerated testing	1	WDR VI.C.2.b	Santa Clarita Valley Sanitation District (SCVSD) requests that the language on page 18 of the WDR § VI.C.2.b be changed as follows: "...Effluent sampling for the first test of the six additional tests shall commence within five business days of receipt of the test results exceeding the toxicity trigger."	The current language allows adequate time to initiate accelerated testing.	None necessary
Storm water	2	WDR.VI.C.3.a	SCVSD requests that the language page 19 of the WDR § VI.C.3.a be removed or changed from "Newhall Ranch SD" to "Newhall Land and Farming," to reflect who will actually be conducting the LID efforts.	The language has been changed to reflect who will actually be conducting the Low Impact Development (LID) efforts.	Language changed in WDR § VI.C.3.a
Sludge disposal	3	WDR.VI.C.5.a	SCVSD requests that the Sludge Disposal requirements on page 21 of the WDR § VI.C.5.a be removed since they are not applicable.	The language has been removed since Newhall Ranch WRP will not process sludge onsite. Language has been added to reflect that sludge will be processed at the Valencia WRP.	Language changed in WDR § VI.C.5.a
Pretreatment	4	WDR.VI.C.5.b	SCVSD requests that the Pretreatment Requirements on page 21 of the WDR § VI.C.5.b be removed since they are not applicable.	Although WDR § VI.C.5.b already indicates pretreatment requirements are not currently applicable, the section contains language indicating the circumstances under which Pretreatment requirements will apply in the future.	None necessary
Standby power	5	WDR.VI.6.g	SCVSD requests that the language on page 27 of the WDR§ VI.C.6.g be removed because it is duplicative of item VI.C.4.c.	The duplicative language on page 27 of the WDR has been deleted.	Deleted § VI.6.g

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Influent Sample type	6	MRP.III.A.1 Table E-2	SCVSD requests that the influent sampling type on page E-8 of the Monitoring and Reporting Program (MRP) be changed to 24-hour composite , for Bis(2-ethylhexyl)phthalate, lindane, and 4,4-DDE.	The sampling type has been changed.	Changed MRP § III.A.1 Table E-2
Footnote for pH & temperature	7	MRP.IV.A.1 Table E-3	SCVSD requests that Footnote 9 on page E-9 of the MRP be deleted because it only applies to receiving water, not effluent sampling.	The footnote has been removed from the effluent monitoring section since the nitrogen species and temperature are collected using different types of sampling methods. However, the footnote will remain in the receiving water section because there the constituents are collected using grab samples.	Changed MRP § IV.A.1 Table E-3
Dichlorobenzene sampling	8	MRP.IV.A.1 Table E-3	SCVSD requests that the effluent sampling type on page E-11 of the MRP be changed to grab for dichlorobenzenes.	The sampling type has been changed.	Changed MRP § IV.A.1 Table E-3
Type of sample for remaining pollutants	9	MRP.IV.A.1 Table E-3	Since dichlorobenzene sample type should be grab, SCVSD requests the following language change for the remaining priority pollutant group on page E-11 of the MRP: "24-hour composite; grab for VOCs and dichlorobenzenes. "	Consistent with the previous comment, the language has been changed.	Changed MRP § IV.A.1 Table E-3
Discharge Point Name	10	MRP.IV.A.2	SCVSD requests that the "A" be removed from the sampling location EFF-001A on page E-11 of the MRP so that it the discharge point is simply referred to as EFF-001."	The effluent discharge point is now labeled as EFF-001.	Changed MRP § IV.A.2
Receiving Water Flow	11	MRP.VIII.A.1 Table E-4a	SCVSD requests that a footnote be added to MRP.VIII.A.1 Table E-4a under the receiving water flow parameter as follows: " Flow at receiving water stations RSW-001U and RSW-002D cannot be measured or estimated because of the soft-bottom nature of the channel. Therefore, total flow is not required to be reported. "	Newhall Ranch has been submitting receiving water flow data, therefore we will continue to require that it be submitted so that we may compare conditions in the receiving water before and after the Publicly Owned Treatment Works (POTW) is built.	None necessary
Footnote 16 for nitrogen compounds	12	MRP.VIII.A.1 Table E-4a	SCVSD requests that Footnote 16 be added to nitrate, nitrite, organic nitrogen, and total nitrogen in MRP.VIII.A.1 Table E-4a under the receiving water monitoring section.	The footnote has been added to nitrate, nitrite, organic nitrogen, and total nitrogen on page E-19, under MRP VIII.A.1 Table E-4a.	Changed MRP § VIII.A.1 Table E-4a

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Units for Algal biomass	13	MRP.VIII.A.1 Table E-4a	SCVSD requests that the units for algal biomass be changed to mg/cm² on page E-19 of the MRP.	The units have been corrected.	Changed MRP § VIII.A.1 Table E-4a
Concurrent sampling	14	MRP.VIII.A.1 Table E-4a	Since pH and DO samples are not collected concurrently with macroinvertebrate or algal biomass samples, SCVSD requests that the reference to pH and DO be removed from the footnote on page E-19 as follows: "Algal biomass or Chlorophyll a samples shall be collected by obtaining scrapings from the substrate, concurrently with pH, dissolved oxygen, and.... "	The reference to pH and dissolved oxygen has been removed.	Changed MRP § VIII.A.1 Table E-4a
Receiving Water Observations	15	MRP.VIII.A.2 through 4	SCVSD requests that the list of observations on page E-21 be removed because they believe the language is outdated and there is no place to enter the results in the new electronic reporting format.	The language has been modified requiring the Discharger to log and report observations when something unusual takes place during sample collection.	Changed MRP § VIII.A.2
Sampling after storm events	16	MRP.VIII.A.5	SCVSD requests that the following language be deleted because they only collect dry-weather receiving water samples: "Receiving water samples shall not be taken during or within 48 hours following the flow of rainwater runoff into the Santa Clara River unless it is safe to do so. "	The language has been deleted.	Changed MRP § VIII.A.5
Rescheduling sampling	17	MRP.VIII.A.6	Monthly, quarterly, semiannual, and annual sampling should also be able to be rescheduled if conditions would endanger personnel collecting the samples. Therefore, language should be: " Weekly s Sampling may be rescheduled at receiving water stations if weather and/or flow..."	If a sampling event is rescheduled, the Discharger should have ample time within the remaining period to collect a sample for a given monthly, quarterly, semiannual or annual event.	Changed MRP § VIII.A.5
Observations	18	MRP.VIII.A.7	Since the receiving water observation language is outdated and should be removed, this language should also be changed, striking out "and observations".	Consistent with the response to comment #15, "and observations" has been deleted from MRP § VIII.A.7 on page E-21.	Changed MRP § VIII.A.7
Clarification Re. Inter-connection Agreement	19	Fact Sheet I.B	SCVSD requests that language on page F-4 of the Fact Sheet be modified as follows to more accurately portray the Interconnection Agreement: "...area will precede completion and initial operation of the Newhall Ranch SD -WRP. With	The language on page F-4 of the Fact Sheet has been modified to clarify the description of the Interconnection Agreement.	Changed Fact Sheet § I.B

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			this this in mind, o On January 9, 2002, SCVSD and Newhall Land and Farming Company (Newhall Land) entered into an Interconnection Agreement. so that With certain conditions, a term of this agreement allows for the sewage generated by the first 6,000 dwelling units of Newhall Ranch would to be temporarily treated at the Valencia WRP, until such time as the Newhall Ranch WRP is constructed. The Interconnection Agreement specifies that Newhall Land will design, fund, and construct all sewers, pumping plants, or force mains required to convey any flow generated within the new county sanitation district that will be treated at Newhall Ranch to the Valencia WRP."		
Permeate description & Newhall Ranch's responsibilities	20	Fact Sheet I.B.2	SCVSD requests that the word treated be deleted from the phrase "treated permeate," since the permeate is the high quality water and is not being further treated. In addition, SCVSD requests that language be added to indicate that Newhall Land is responsible for not only the pipelines that will be conveying permeate from the Interim Demin Facility to the Valencia WRP, but also for the pipelines to convey any flow generated from Newhall Ranch to be treated at the Valencia WRP.	Subsection 1 has been added to § I.B of the Fact Sheet to indicate that Newhall Land will also obtain the necessary permits, design, fund, and construct "all sewers, pumping plants, and force mains required to convey any flow generated from Newhall Ranch to be treated at the Valencia WRP."	Changed Fact Sheet § I.B
Injection System	21	Fact Sheet I.B.3	SCVSD requests that language be added as follows to reflect that Newhall Ranch will build the injection system itself: "Any necessary pipelines to convey the brine waste stream from Interim Demineralization Facility to the deep-well injection system and the injection system itself which will be permitted under a separate USEPA-issues Class I Non-hazardous Underground Injection Control (UIC) permit."	Language has been added to section I.B.4 (formerly section I.B.3 prior to renumbering) to indicate that Newhall Ranch will also obtain the necessary permits, design, fund, and construct "the injection system itself."	Changed Fact Sheet § I.B.3
Chloride concentration reference	22	Fact Sheet I.B.3	Since the permeate will be significantly less than 100 mg/L, SCVSD does not believe that it is necessary to make this statement. SCVSD	While the word "primarily" has been deleted as requested, the remaining language was not deleted to maintain	Changed one of two items in Fact Sheet §

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			suggests that the language be changed as follows: "On August 27, 2013, they indicated that the demineralized treated effluent, also known as permeate, containing chloride concentrations of 100 mg/L or less, would be combined with Valencia WRP's tertiary treated effluent primarily for discharge to the Santa Clara River."	consistency with the language used in Regional Water Board Order No. R4-2012-0139, <i>Clean Water Act Section 401 Water Quality Certification and Waste Discharge Requirements (WDRs) for Newhall Land and Farming Company (Newhall Land & Farming 401 WDR)</i> .	I.B.
Description of transfer of ownership from Newhall Land to LACSD	23	Fact Sheet I.D	SCVSD requests the following language changes to more accurately portray that any land must be turned over to the Newhall Ranch SD prior to any sewage going to the Valencia WRP and modify the description of the JAA: "Once the POTW is constructed and its operation successfully demonstrated, Newhall Land will transfer ownership of the POTW to Newhall Ranch SD. The Newhall Ranch SD will own and operate a POTW comprised of the Newhall Ranch WRP and its associated wastewater collection interceptor sewer, trunk sewers, and outfalls. The County of Los Angeles Sewer Maintenance District will own and operate the remainder of the collection system for Newhall Ranch. Newhall Ranch SD will petition to join the existing Joint Administration Agreement (JAA) that forms the confederation of 23 county sanitation districts known as the Los Angeles County Sanitation Districts (LACSD) and provides for a single administrative staff to support each sanitation district. If added to the JAA, LACSD staff would replace DPW staff in supporting the Newhall Ranch SD. Attachment B4 provides a schematic of the members of the JAA."	The language on page F-6 of the Fact Sheet has been modified for clarity.	Changed Fact Sheet § I.D
Newhall Ranch Plant capacity description	24	Fact Sheet II.A.2	SCVSD suggests the following changes for clarity: "The 2.0 mgd facility will serve the inhabitants of the first approximately 7,700 6,000 dwelling units within the Newhall Ranch Specific Plan area, with	Reference to the 6000 dwelling units was retained to preserve the language used in the <i>Newhall Land & Farming 401 WDR</i> . However, some of the existing language	Slightly modified Fact Sheet § II.A.2

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			an estimated 2.38 to 3.17 persons per unit, or an estimated population range of approximately 18,300 to 24,380 persons. The 2.0 mgd facility will be designed to have the capacity of treating the sewage from an additional 1,690 dwelling units, assuming 260 gpd per unit of wastewater generation.	was reconfigured for clarity.	
Updating hydrologic unit codes (HUC)	25	Fact Sheet III.C.1 Table F-4a	SCVSD requests that the HUC codes listed in Table F-4a be changed to reflect the most recent HUC codes in the Basin Plan update.	The new codes have been added to the table, but the former codes were also kept for reference.	Changed Fact Sheet § II.A.2
Listing all groundwater basins	26	Fact Sheet III.C.1 Table F-4b	SCVSD believes it is not appropriate to include some of the groundwater basins and their respective beneficial uses in the fact sheet because some basins do not underlie the project area.	It is customary to include all of the groundwater basins from the project area all the way to the coast, similar to the way that surface water beneficial uses are listed from the point of discharge all the way down to the coast.	None necessary.
Plan for Recycled Water	27	Fact Sheet III.C.11	This requirement should clearly be spelled out in the Special Studies section of the permit, not in the Fact Sheet.	Language has been added to the WDR under Special Provisions § VI.C.2.d, but the current language was retained in Fact Sheet § II.C.11.	Changed WDR § VI.C.2.d
Benzo(b) pyrene	28	Fact Sheet VIII.B. Table F-11	Monitoring of this constituent was not required in the 2007 permit and is not required in this tentative draft. Therefore, this parameter should be removed from the table	The constituent has been corrected to read Benzo(b) fluoranthene not Benzo(b) pyrene .	Changed Fact Sheet § VIII.B
Methoxychlor	29	Fact Sheet VIII.B. Table F-11	Methoxychlor monitoring is not required per the 2013 tentative draft so the table should say "--" instead of "semiannually."	The word semiannual has been replaced with "--" to indicate that Methoxychlor monitoring is no longer required.	Changed Fact Sheet § VIII.B