



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

STEPHEN R. MAGUIN
Chief Engineer and General Manager

May 4, 2009
File No: 84-01.01-00

Ms. Tracy Egoscue, Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Dear Ms.Egoscue:

Comments on Tentative Waste Discharge Requirements (WDRs) and National Pollutant Discharge Elimination System (NPDES) Permits for Joint Outfall System San Jose Creek Water Reclamation Plant (NPDES No. CA0053911, CI No. 5542)

The Joint Outfall System¹ (Sanitation Districts) appreciates the opportunity to comment on the Tentative Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit (Tentative Permit) for the San Jose Creek Water Reclamation Plant, dated April 2, 2009. We have reviewed the Tentative Permit and support adoption of the Tentative Permit, with minor corrections. The Sanitation Districts understand that the Regional Board staff has agreed to make changes to the Tentative Permit, as listed in Attachments A and B. We would also like to take this opportunity to thank staff at the California Regional Water Quality Control Board, Los Angeles Region for addressing several of our concerns during development of the Tentative Permit. If you have any questions concerning this letter or need additional information, please contact Ann Heil at (562) 908-4288, extension 2803.

Very truly yours,
Stephen R. Maguin


Raymond Tremblay
Assistant Department Head
Technical Services

RT:ATH:nm
Attachments

cc: David Hung, Rebecca Christmann, Don Tsai, Los Angeles Regional Board

¹ Ownership and operation of the Joint Outfall System is proportionally shared among the signatory parties to the amended Joint Outfall Agreement effective July 1, 1995. These parties include County Sanitation Districts of Los Angeles County Nos. 1, 2, 3, 5, 8, 15, 16, 17, 18, 19, 21, 22, 23, 28, 29, and 34, and the South Bay Cities Sanitation District of Los Angeles County.

ATTACHMENT A

San Jose Creek WRP Tentative NPDES Permit Comments Attachment A

Page No.	Section	Discussion	Response
15	III.C.	<p>The design flow of the plant is based on the dry weather effluent flowrate from the plant, not the influent flowrate. Previous permits issued to the Sanitation Districts (JWPCP, LB, LC, tentative permits for WN, SAUG, and VAL) all reflect this. We request that the Regional Board change "The maximum daily flow of influent from the collection system to the headworks of the East and West Plants" to "The monthly average effluent dry weather discharge flow rate from the East and West Plants shall not exceed ..."</p>	Agreed
17 & F-80 & F-86	IV.A.1.a Table 6A & Fact Sheet Table 8A and 9A	<p>The dry weather copper limits for 001, 001A, and 001B are set as limits that vary based on the flows from the East and West Plants. Because the limits do not change much based on flow, and because it is more complex to do reporting and verify compliance on a variable limit, we request that in this case the limit just be set at the more stringent value. We do not believe that setting that limit at the lowest value would be appropriate if the limit changed considerably based on flows from the two plants, but in this case it is appropriate. We request that the Regional Board change the dry weather copper limits at 001, 001A, and 001B to 15.3 ug/L average monthly, 22.6 maximum daily and delete appropriate text from Footnotes 9 and 10 describing this variable concentration. Corresponding changes to the mass limits should be a fixed 12.8 lbs/day for the average monthly limit and 18.8 for the maximum daily limit. These limits are based on the 100 mgd flow rate for the combined East and West Plants as described in Footnote 8. Footnotes 11 and 12 should be deleted.</p> <p>Related changes in Fact Sheet: Similar changes to the limits and footnotes in Tables 8A and 9A should reflect any changes to the WDR. Copper limits in Table 8A and 9A should have the same footnotes.</p>	Agreed

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Page No.	Section	Discussion	Response
17 & F-80	III.A.1.a, Table 6A & Fact Sheet Tables 8A and 9A	<p>The permit includes limits for lead and selenium at 001. Per Don Tsai, the limits are included in 001 because of water in 001 from the East side of the plant. However, Footnote 13 in the Order and Footnote 55 in the Fact Sheet also indicate that the mass limits for these pollutants are based on flow from the east side only (62.5 mgd). The mass limits for lead and selenium at 001 should instead be based on the total flow from the plant of 100 MGD. This would be consistent with how mass limits were set in the current permit for the San Jose Creek WRP. Footnote 8, which includes calculation of mass limits for combined plant design flowrate of 100 mgd, should be used instead of Footnote 13 on Lead and Selenium for 001. (The Factsheet Footnote 49 on Selenium is a reference to ammonia, so both Footnotes 55 and 49 in the Factsheet should be changed to Footnote 50.) Using the calculation in Footnote 8, the mass limits for 001, 001A, and 001B should be Lead monthly average limit of 4.9 lbs/day and maximum daily limit of 16 lbs/day; Selenium monthly average limit of 3.7 lbs/day and maximum daily limit of 5.9 lbs/day.</p> <p>Related changes in Fact Sheet: Similar changes to the limits and footnotes in Tables 8A and 9A should reflect any changes to the WDR. Lead and Selenium mass limits in Table 8A and 9A should have the same footnotes.</p>	The mass limits for lead and selenium at 001 will be based on flow weighting the mass limit from the East side of the plant with the mass from the West side of the plant, based on the maximum effluent concentration at the West side of the plant.
22	IV.B.	Information about existing Montebello Forebay Groundwater Recharge Permit should be included under Item IV.B.. Suggested language, from the Pomona WRP tentative permit, is "Water Reclamation Requirements for Groundwater Recharge. The Los Angeles County of Public Works, County Sanitation Districts of Los Angeles County, and Central and West Basin Water Replenishment District, collectively referred to as the Reclaimer, recharge the Rio Hondo and San Gabriel Spreading Grounds, located in the Montebello Forebay, with water purchased from JOS's Whittier Narrows, Pomona, and San Jose Creek WRPs, under Order No. 91-1 00, adopted by the Board on September 9, 1991."	Agreed
26	V.A.17.c	The station list for which acute toxicity testing is required appears to be incorrect. Acute toxicity testing is conducted at the immediate downstream receiving water location in our other NPDES permits. Downstream stations include C-2 and R-2, not C-1. The reference to C-1 (RSW-001) and "upstream" should be deleted. The text should read, "c. The acute toxicity of the receiving water, at the Stations RSW-002, RSW-004, RSW-005, RSW-006, and RSW-007 located downstream of the discharge, ..."	Agreed
27	V.A.18.c	Change "if two of the six tests exceed a monthly median of 1 TUc trigger" to "If two of the six tests exceed a 1.0 TUc..." This language is consistent with other permits issued to the Sanitation Districts.	Agreed

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27	V.A.19.	Change sentence to add "immediate downstream" as follows: "Compliance with the ammonia water quality objectives shall be determined by comparing the immediate downstream receiving water ammonia concentration to the ammonia water quality objective in the Basin Plan." This revision makes the WDR consistent with the MRP Section VII.A.1., which references "RSW-002, RSW-004, RSW-005, RSW-006, and RSW-007"	Agreed
31	VI.A.2.w	Previous NPDES permits issued to the Districts required 24-hour notification and a five-day letter for exceedances of daily maximum limitations. The tentative permit require such notification for all effluent exceedances, even those for monthly average limitations. The Sanitation Districts do not believe this notification should apply to monthly average limitations. Such limits are set to protect long term water quality considerations, not acute threats. It is not clear what the Regional Board would do with this information, and submittal of the information is an unnecessary drain on public resources. We request that the Regional Board change "effluent limitation" to "maximum daily or instaneous effluent limitation."	Agreed
34	VI.C.2.a	We request changing "sampling shall commence within 3-days" to "tests shall initiate within 5-days" to be consistent with other parts of the permit.	Agreed
E-6	Table 1 EFF-001	We request changing this description to "This location represents the flow-weighted calculations for the combined effluent to DD1, DD1A, or DD1B. No sampling or continuous recorder monitoring is done at this location. Flow weighting calculation of required parameters is performed using samples taken from EFF-002 and EFF-003."	Agreed
E-6	Table 1 EFF-001X	We request changing this description to "The effluent sampling location for total residual chlorine, pH, and temperature is located at outfall for the discharge DD1, DD1A, or DD1B. The total residual chlorine, pH, and temperature limitations shall be applied to the effluent sample collected at this point" This helps to clarify that the only samples that are taken for combined effluent at 001, 001A, and 001B are residual chlorine, pH, and temperature.	Agreed

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Page No.	Section	Discussion	Response
E-9	MRP IV.A.	For clarity, a sentence should be added to make it clear that that samples are taken only at EFF-001X and all other required monitoring for EFF-001 is based on flow-weighted calculations. We request that the paragraph immediately before Table 3A be changed to read as follows: "The Discharger shall monitor combined flow at 001, 001A, and/or 001B as follows. The effluent monitoring at Discharge Serial Nos. 001A and/or 001B is required only when the effluent through these outfalls. Total residual chlorine, pH, and Temperature shall be monitored at EFF-001X. Monitoring for other required parameters for 001, 001A, and 001B are based on flow-weighting calculations from San Jose Creek East and West WRP data.** If more than one analytical test method is listed for a given parameter, the Discharger must select from the listed methods and corresponding Minimum Level:" ** represents a footnote that should read "Concentration, EFF-001 = ((East Concentration x East Flow to 001) + (West Concentration x West Flow to 001))/(Flow to 001).	Agreed
E-11	MRP, IV.A.	We request that a new paragraph be added, similar to the receiving water sampling language from R4-2004-0097, since EFF-001X sampling is performed in the San Gabriel River bed. "EFF-001X samples shall not be taken during or within 48 hours following the flow of rainwater runoff into the San Gabriel River system.The monthly monitoring report shall note such occasions." The purpose of this paragraph would be to ensure the safety of our sampling personnel, by not requiring them to enter the riverbed when there is a strong probability of flooding.	Agreed
E-11, E-17	MRP IV.A. Table 3A & MRP Section IV.D.	Total chlorine residual cannot be monitored using continuous recorder at EFF-001 and is only monitored by a grab sample at EFF-001X. EFF-001X is at a remote location in a streambed several miles downstream of the plant. Equipment can not be maintained there due to vandalism and storm flooding. We request deletion of the requirement to conduct continuous monitoring for chlorine at either 001 or 001X in Table 3A. Footnote 22 therefore would not apply to EFF-001 or EFF-001X (but should be retained because it applies to EFF-002 and EFF-003). Additionally, MRP Section IV.D. should be changed to remove references to 001X.	Agreed
E-12	MRP IV.A. Table 3A	We request adding Footnote 23 to pH and Temperature in Table 3A. This footnote specifies that the daily grabs for these parameters would only have to be conducted on weekdays. This is consistent with what is currently reported for 001.	Agreed

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Page No.	Section	Discussion	Response
E-11 & E-12	MRP IV.A. Table 3A	We request changing the Sample Type to "calculated" for all parameters in Table 3A except Chlorine Residual, pH, and Temperature to reflect that no sampling occurs for these parameters at this location. It is not physically possible to sample the combined effluent from the East and West sides that is put into 001, since the flows from the East and West sides combine in an underground line some distance downstream of the plant. We currently calculate pollutant concentrations in 001 using data from the East and West sides.	Agreed
E-12	MRP Table 3A	Add a new footnote to the entires for Chronic toxicity and Acute toxicity. "Toxicity monitoring is conducted for East side and West side effluent. For compliance determination, if an exceedance is observed in either the East side or West side effluent, and if the effluent is discharged from that side to EFF-001, an exceedance would also be assumed to have occurred at EFF-001. This is consistent with what is currently reported for 001." This footnote is necessary, because toxicity results from the East and West sides can not be flow-weighted to obtain a result for EFF-001.	Agreed
E-11, E-14, & E-15	MRP Tables 3A, 3B, and 3C	Add a second entry in the table for turbidity, with a sample type of "24-hour composite" and a frequency of "daily" for each outfall table (except for EFF-001, where the sample type should be "calculated.") . This will clarify the turbidity monitoring requirements. Currently, the requirement to collect this daily flow weighted sample is contained in Footnote 20. The turbidity recorder is used to determine compliance with the 5 NTU limit and the limit of less than 72 minutes.	Agreed
E-13	MRP Footnote 26	The correct upstream monitoring locations for dioxin monitoring are RSW-001, located upstream of EFF-002, and RSW-003, located upstream of EFF-003.	Agreed
E-14	MRP IV.B.	Information should be added about EFF-002X that is missing from this permit but has been included in other recent permits. Also, clarification should be provided as to when data from 002 needs to be reported. We request that the paragraph immediately before Table 3B be changed to read, "The Discharger shall monitor effluent from the East Plant at EFF-002, except chlorine residual and temperature. Total residual chlorine and temperature shall be monitored at EFF-002X. Results for EFF-002 and EFF-002X need only reported when there is effluent through this outfall. The results of analyses from EFF-002 are also representative of the East Plant discharge to EFF-001 for all parameters except chlorine residual, pH, and temperature, and are used for flow-weighting calculations reportable for EFF-001. If more than one analytical test method is listed for a given parameter, the Discharger must select from the listed methods and corresponding Minimum level."	Agreed

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Page No.	Section	Discussion	Response
E-15	MRP IV.B.	Information should be added about EFF-003X that is missing from this permit but has been included in other recent permits. Also, clarification should be provided as to when data from 003 needs to be reported. We request that the paragraph immediately before Table 3C be changed to read, "The Discharger shall monitor effluent from the West Plant at EFF-003, except chlorine residual and temperature. Total residual chlorine and temperature shall be monitored at EFF-003X. Results for EFF-003 and EFF-003X need only reported when there is effluent through this outfall. The results of analyses from EFF-003 are also representative of the West Plant discharge to EFF-001 for all parameters except chlorine residual, pH, and temperature, and are used for flow-weighting calculations reportable for EFF-001. If more than one analytical test method is listed for a given parameter, the Discharger must select from the listed methods and corresponding Minimum level."	Agreed
E-14 & E-16 & F-91	MRP Tables 3B & 3C and Fact sheet Table 10.	The Sample Type for Temperature should be "grab" and sample type "daily" . Order No. R4-2004-0097 gave an option in footnote 22 for daily grab or continuous; however there are no continuous temperature recorders for 001, 002, or 003. (Table 3A should also have grab and daily as discussed above). In the factsheet the row for temperature should say "Daily or Continuous" for 2004 Permit column and "Daily" for 2009 Permit column.	Agreed
E-14	MRP Table 3B	Add a second entry to Table 3B for Total Residual Chlorine. This entry should have a sample type "grab" and frequency "daily" with a new footnote similar to #23 on EFF-001 stating that the "Analytical results of the daily grab samples will be used to determine compliance with total residual chlorine effluent limitation at EFF-002X. Furthermore, additional monitoring requirements specified in section IV.D. shall be followed."	Agreed
E-15	MRP Table 3C	Add a second entry to Table 3C for Total Residual Chlorine. This entry should have a sample type "grab" and frequency "daily" with a new footnote similar to #23 on EFF-001 stating that the "Analytical results of the daily grab samples will be used to determine compliance with total residual chlorine effluent limitation at EFF-003X. Furthermore, additional monitoring requirements specified in section IV.D. shall be followed."	Agreed

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Page No.	Section	Discussion	Response
E-13, E-15, E-17 & E-28	MRP Tables 3A, 3B, 3C, and 4A, and Footnotes 25 and 34	We request that the requirement to monitor for organo-phosphate pesticides (demeton, guthion, malathion, methoxychlor, mirex, and parathion) be changed to annual instead of semi-annual . These are very expensive analyses, and we do not believe there is justification to require monitoring more frequent monitoring. Note that the correct CFR reference for these pesticides is 40 CFR Part 125.58(p). Additionally, there are no 40 CFR Part 136-approved methods for demeton-o, demeton-s, methyl parathion, and ethyl parathion, so our lab plans to use USEPA Method 8141A. Footnotes 25 and 34 should read, " 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). Where 40 CFR Part 136-approved methods are not available for these compounds, USEPA Method 8141A shall be used. "	The frequency will stay at semi-annual, but the use of USEPA Method 8141A will be added to the permit.
E-12, 15, & E16	MRP Tables 3A, Table 3B, Table 3C.	We request that we be allowed the option of using USEPA Method 331 for perchlorate since matrix interference can prevent attaining the specified RL of 2 ug/L using Method 314. We suggest that a reference simply be made to Footnote 32 , which already addresses this issue for receiving water monitoring.	Agreed
E-13, 15, & E16	MRP Tables 3A, Table 3B, Table 3C.	We request that we be allowed the option of using USEPA Method 624 for MTBE so that this parameter can be run with other required effluent parameters, instead of having to run a special analytical procedure for it. We suggest that a reference simply be made to Footnote 32 , which already addresses this issue for receiving water monitoring.	Agreed
E-12, 15, & E16	MRP Tables 3A, Table 3B, Table 3C.	We request that we be allowed the option of using USEPA Method 524.2 for 1,2,3-trichloropropane to achieve the specified RL of 0.005 ug/L . We suggest that a reference simply be made to Footnote 32 , which already addresses this issue for receiving water monitoring.	Agreed
E-19	V.B.2.i	Screening should start in 2009, not 2008 as listed. Since the permit will not become effective until mid-2009, we request the language state that screening should be conducted " for three consecutive months starting in 2009 " instead of "in 2008"	Agreed
E-26	Table 4A	The table for receiving water monitoring does not include a requirement for dioxin congeners. However, such monitoring is mentioned in the effluent monitoring table, p. E-13, Footnote 26. For clarity, the required dioxin congener monitoring should be added to the receiving water monitoring table, along with the associated footnote.	Agreed

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Page No.	Section	Discussion	Response
E-26	VII.A.1.	We request changing the last sentence of the first paragraph of this section from "used to calculate the receiving water ammonia compliances" to "used to calculate the receiving water ammonia water quality objectives."	Agreed
E-26	MRP Table 4A, Footnote 29	This issue was discussed at the meeting between LA Regional Board and Sanitation Districts' staff on March 17, 2009. At that time, it was agreed that quantitative flow measurements could only be made at RSW-005 (R-12). For the other stations, language in the tentative permit for the Whittier Narrows WRP NPDES permit was to be used. Therefore, we request that Footnote 29 be changed to read, "Flow at receiving water stations RSW-001, RSW-002, RSW-003, RSW-004, RSW-006, and RSW-007 cannot be measured or estimated because of the soft bottom nature of the channel. Therefore, total flow is not required to be reported."	Agreed
E-26	MRP Table 4A	We request that the language be modified to state, "Nitrate nitrogen, nitrite nitrogen, ammonia nitrogen, organic nitrogen, total kjeldah nitrogen, pH, and temerature sampling shall be conducted on the same day or as close to concurrently as possible." It currently simply says that they have to be done concurrently. However, pH and temperature are analyzed on all grabs and the rest on composites. It is difficult to schedule the pH and temperature grabs to be taken at the same time.	Agreed
E-27	MRP Table 4a	We request that the receiving water chlorine residual frequency be changed from weekly to monthly . Under the agreement for the Sanitation Districts to fund the SGRRMP, it was agreed that all weekly receiving water monitoring would be ended, and the funds from weekly be put toward implementing the SGRRMP. If the chlorine residual receiving water monitoring frequency remains at weekly, we would have to alter the agreement and reduce funding to the SGRRMP to pay for a sampling crew to go out weekly.	Agreed
E-27	MRP Table 4A	The sampling frequency for chronic was changed from quarterly to monthly in this permit, with no justification provided. We request that the frequency be changed back to its current frequency of quarterly .	Agreed
E-28	MRP, VI.A.	Request adding new paragraph with the following language from R4-2004-0097. "Receiving water samples shall not be taken during or within 48 hours following the flow of rainwater runoff into the San Gabriel River and San Jose Creek systems." The purpose of this paragraph would be to ensure the safety of our sampling personnel, by not requiring them to enter the riverbed when there is a strong probability of flooding.	Agreed

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Page No.	Section	Discussion	Response
E-28	MRP, VI.A.	Request adding a new paragraph with the following lanugage from R4-2004-0097. "Sampling may be rescheduled at receiving water stations, if weather and flow conditions would endanger personnel collecting receiving water samples. The monthly monitoring report shall note such occasions."	Agreed
E-29	MRP VIII.A.2	We request adding "RSW-005 (R2)" to bioassessment requirement.	Agreed
F-26	Fact Sheet, II.E	The Sanitation Districts have not yet made a decision as to whether to install UV treatment at the San Jose Creek WRP. Implementation of sequential chlorination has reduced effluent NDMA concentrations to acceptable, pre-NDN levels. Please delete the existing language under "Planned Changes" and insert "The San Jose Creek WRP's treatment system has been recently upgraded with respect to nitrogen removal, in order to comply with the Basin Plan water quality objective for ammonia nitrogen. No other changes are planned."	Agreed

ATTACHMENT B

San Jose Creek WRP Tentative NPDES Permit Comments Attachment B

Page No.	Section	Clarification	Response
1	Footnote 1	Footnote 1 misspelled Los Coyotes	Agreed
4 & F-7	Table of Contents and Fact Sheet II.A.3	In Table of Contents, change Attachment B to include both Attachment B-1 and B-2 . In Fact Sheet last sentence of II.A.3. should be revised to "Attachments B-1 and B-2 are schematics of the Plant wastewater flow." There are separate attachments B-1 for East WRP and B-2 for West WRP Flow Schematics	Agreed
20	IV.A. 4.a.	For the section on Percent Removal: delete the second paragraph. This appears to be language from the old permit because it refers to "30-day averages". WN and PO do not include this paragraph.	Agreed
35	VI.C.3.b	Request text be changed to, "Within ninety days of the effective date of this Order, the Discharger is required to submit a Spill Clean-up Contingency Plan" This clarifies the date of the submittal.	Agreed
39	VI.C.5.b.iv.	Change "attached Pretreatment Reporting Requirements (Attachment P)" to "attached Pretreatment Reporting Requirements (Attachment J)" Pretreatment Reporting Requirements is Attachment J	Agreed
40	VI.C.6.a.ii. & iii.	"Office of Emergency Services" should be changed to "CalEMA," to reflect the current agency name.	Agreed
42	VI.c.6.c.ii	Add phrase after "A written preliminary report five working days after disclosure of the incident." as follows "(submission to the Regional Water board of the CIWQS SSO Event ID shall satisfy this requirement)". This has been corrected in previous permits.	Agreed
B-1 & B-2	Schematics	Revised to show backup dechlorination system using sodium bisulfite . Adobe pdf and jpg files for your use will be sent separately when ready.	Agreed
E-7	Table 1	GPS coordinates for RSW-003 (R-10) are incorrect. The text should read "34° 02' 22.5" N, 118° 06' 31.4" W, upstream of San Jose Creek confluence (R-10)"	Agreed
E-7	Table 1	GPS coordinates for RSW-004 (new R-11) are incorrect. The text should read, "The original receiving water sampling point of R-11 (34° 02' 11.5" N, 118° 01' 51.9" W, specified in Order No. R4-2004-0097), downstream of San Jose Creek confluence, has been relocated no further than 100 feet downstream (34° 02' 09.9N, 118° 01' 53.4" W) of Discharge Serial No. 003. This new location is also used for San Gabriel River ammonia receiving water point of compliance."	Agreed

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Page No.	Section	Clarification	Response
E-7	Table 1	Table describes RSW-007 as "no further than 100 yards" d/s of discharge. This should be changed to "within 100 feet" to be consistent with the other downstream stations.	Agreed
E-9	Tables 2A & 2B	Chromium (III) Sample Type is listed as grab. This should be changed to "calculated."	Agreed
E-9 & E-10	Table 2A and 2B	The sample type for Total Chromium should be "grab," the frequency should be "semiannually," and Footnote 18 should be added to the analytical method column.	Agreed
E-12, E-14, and E-16	Tables 3A, 3B, and 3C	Effluent acute toxicity sample type should be changed to "24-hour composite."	Agreed
E-12	Footnote 23	Change referenced section "IV.A.2" to section "IV.D." This is intended to be the reference about extra chlorine residual grabs if triggered by the meter. Section IV.D. (on page E-17) discusses monitoring of total residual chlorine at sampling locations 002-X and 003-X.	Agreed
E-13	Footnote 28	For the Radioactivity parameter, delete the word, "combined" since radium-226 and radium-228 are analyzed separately.	Agreed
E-15	IV.C.	Change "Wesy" to "West" in first sentence	Agreed
E-15 & E-16	Tables 3B and 3C	The Perchlorate sample type should be "24-hour composite"	Agreed
E-23	V.E.3	The wrong Phase I method number is listed. It should be "EPA/600/6-91/005F (Phase I)" not "EPA/600/R-96-054 (Phase I)."	Agreed
E-26	Footnote 30	Change "total kjeldah nitrogen" to "total kjeldahl nitrogen"	Agreed
E-28	VII.A.1.ii	Change the outline numbering of this paragraph to VII.A.2. This paragraph is also missing a phrase from other permits with a similar paragraph. The paragraph should read as follows: VII.A.2. Flow Monitoring Station - The Discharger shall report the maximum daily flow at USGS Station 11087020. This station is "also known as RSW-008" for the purposes of this permit.	Agreed
E-34	IX.C.3.	Should say "All discharge monitoring results" instead of "All charge monitoring results."	Agreed

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Page No.	Section	Clarification	Response
F-6 & F-7	Fact Sheet, II.A.2	Change "sodium hypochlorite" to "gaseous chlorine." Change "sodium bisulfite" to "sulfur dioxide." Also, note that we do have a backup dechlorination system that uses sodium bisulfite. Recommended text for the entire paragraph is as follows: "2. Gaseous chlorine is used as a disinfectant at the Plant. The disinfecting agent is added to the treated effluent prior to the filters to destroy bacteria, pathogens, and viruses, and to minimize algal growth in the filters. Additional disinfectant may be dosed prior to the serpentine chlorine contact chamber. Prior to discharge, sulfur dioxide is added to the treated effluent to remove residual chlorine. Also at this point is a backup dechlorination system that uses sodium bisulfite. "	Agreed
F-7	II.B.1.a	Replace "Figure C-1" with "Attachment C"	Agreed
F-24	II.D.	Words appear to be missing from the last sentence. The text should read "The San Jose Creek WRP did not have any violations in 2008."	Agreed
F-35	Table 5	The footnotes 40, 41, and 42 on TSS should be replaced with 46, 47, and 48 (same as BOD footnotes).	Agreed
F-52	4-Day Objective	Change "2.5 X 6.18 = 24.73" to "2.5 X 6.18 = 15.46" . Also correct this number on the Ammonia Water Quality Objectives (WQO) Summary below: "Four-day Average = 15.46 mg/L"	Agreed
F-71	Table 7B	Reason column for Cadmium should say "C>B, C>MEC" instead of "TMDL" There is no TMDL limit for Cadmium at 003.	Agreed
F-80	Table 8A	Footnotes on mass emission rates for all limits for 001 in this table (Ammonia, Copper, Lead, Selenium) should be based on 100 mgd. Footnote 50 appears to be appropriate.	Agreed
F-81	Table 8B	Footnotes on mass emission rates for all limits for 002 (Ammonia, Copper, Lead, Selenium) should be based on 62.5 mgd. Footnote 56 appears to be appropriate.	Agreed
F-81	Table 8C	Footnotes on mass emission rates for all limits for 003 (seasonal Ammonia) should be based on 37.5 mgd. Footnote 58 appears to be appropriate.	Agreed
F-85	Table 9A	Footnote 53 on all the lbs/day units in this table should be footnote 59 like on BOD or footnote 50 from Table 8A. Footnote 53 appears only to refer to the variable limits for Copper. Mass limits for 001, 001A, and 001B are based on 100 mgd.	Agreed
F-85	Table 9A	Footnotes 44 and 45 on 001 Ammonia mass limits are not related to ammonia. Based on the footnotes for 002 and 003, it appears that Footnote 59 or 50 on the lbs/day in the units column would be appropriate like others in the table.	Agreed