



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

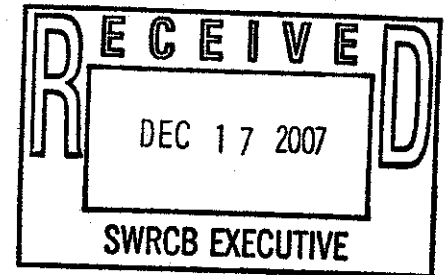
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Chief Engineer and General Manager

December 17, 2007
File No. 31-370-40.4A

Via electronic and U.S. mail

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



Comment Letter - Los Angeles Region Ammonia Site-Specific Water Quality Objective

The Joint Outfall System¹ and the Santa Clarita Valley Sanitation District of Los Angeles County (Districts) appreciate the opportunity to provide comments on a proposed amendment to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) to incorporate site-specific objectives (SSOs) for ammonia in select waterbodies of the Santa Clara River, Los Angeles River, and San Gabriel River Watersheds. The Districts worked collaboratively with the Cities of Los Angeles and Burbank as well as interested parties such as the California Regional Water Quality Control Board, Los Angeles Region (Regional Board), the United States Environmental Protection Agency (USEPA), and the California Department of Fish and Game to develop these SSOs for ammonia. As currently proposed, the Districts fully support the proposed amendment and strongly recommend approval of this amendment by the State Water Resources Control Board (State Board). We have several comments in support in support of approval of the amendment, as detailed below.

Scientific Credibility

The SSOs have a very high degree of scientific credibility. They were developed with advice from a Technical Advisory Committee comprised of experts in the fields of toxicity, ammonia, and criteria development, and a Coordinating Committee comprised of representatives from interested and affected organizations. They are fully protective of beneficial uses in the associated water bodies.

Need for SSO Adoption

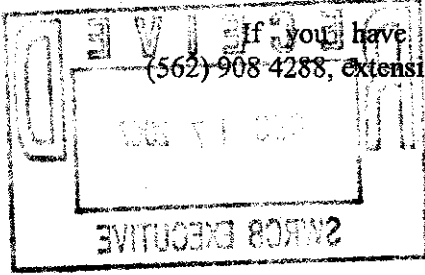
We currently operate all of our water reclamation plants (WRPs) in the San Gabriel River, Los Angeles River, and Santa Clara River Watersheds with nitrification and denitrification (NDN) to minimize the discharge of ammonia and nutrients. Upon conversion of our WRPs to NDN in 2003, ammonia discharge concentrations dropped to approximately 1 to 2 mg/L. We are pursuing the ammonia SSOs primarily to provide some operation flexibility to the WRPs operating with NDN. For example,

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.

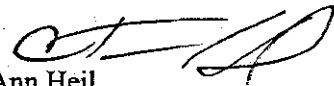
some amount of ammonia in the wastewater is necessary in the disinfection process to minimize the formation of trihalomethanes in the effluent.

The final technical report containing the scientific justification for the SSOs was submitted to the Regional Board in September 2003. Receiving waters downstream of the Districts have exceeded the existing Basin Plan ammonia criteria on occasion in the last four years and in almost all instances those exceedances would not have been considered exceedances if the SSOs were in place. The Districts take every step to be in compliance with our permits and also are committed to the protection of the downstream waterbodies. The Districts believe that these SSOs are scientifically valid and that their adoption will allow the appropriate level of protection against ammonia toxicity to the downstream waterbodies. Thus, the Districts urge the State Board to approve these SSOs at the earliest possible date.

If you have any questions concerning this letter, please contact the undersigned at (562) 908-4288, extension 2803.



Very truly yours,
Stephen R. Maguin


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