

**ITEM 6 – Late Revision and Addition**

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LAHONTAN REGION**

**BOARD ORDER NO. R6V-2015-(PROPOSED)  
WDID NO. 6B140800002**

**WASTE DISCHARGE REQUIREMENTS  
FOR  
CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE  
FISH SPRINGS HATCHERY**

\_\_\_\_\_ Inyo County \_\_\_\_\_

The following late revision is proposed. Deletions are in ~~Strikeout~~ and insertions are Red Underlined.

Attached is a June 5, 2015 4:50 pm email from Katherine Rubin, City of Los Angeles Department of Water and Power, describing that the California Department of Fish and Wildlife staff, not Department of Water and Power, collects supply well flow information. The supply well flow meters are visually inspected on an annual basis, but do not require calibration. The Department of Water and Power continues to request that it not be named as a Discharger.

Staff proposes the following revisions to clarify that supply well flow data is not collected by the Department of Water and Power. Staff recommends the Department of Water and Power be named as a Discharger for the limited purpose of providing the results of annual visual inspections of the supply well pumps and flow measuring equipment.

**Bate Stamp 6-7**, Table 1 of the Order. Modify the Department of Water and Power's responsibility as a Discharger.

<b>Discharger</b>	State of California, Department of Fish and Wildlife (Primary – Facility Owner & Operator) and City of Los Angeles Department of Water and Power (for the limited purpose of <u>inspecting</u> monitoring flow from its <u>supply well</u> pumps <u>flow measuring equipment</u> )
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**Bate Stamp 6-50**, Attachment E – Monitoring and Reporting Program, Section I – General Monitoring Provisions, Item B modified as follows.

**B.** ~~Los Angeles Department of Water and Power (LADWP) will monitor flow (influent) into the Facility and provide that information to the Discharger.~~ Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. Calculated flows shall be calculated consistent with accepted engineering practices. The Discharger must provide information on how the flow measurement is obtained at each location where flow monitoring is required. The information must include the instrument used, last calibration date and

results and the name of the person who conducted the measurement. LADWP must provide the Department of Fish and Wildlife Discharger with relevant information regarding its supply wells pumps and flow measuring equipment in a timely manner for inclusion in monitoring reports.

**Bate Stamp 6-62**, Table F-1 of the Fact Sheet. Modify the Department of Water and Power's responsibility as a Discharger.

<b>Discharger</b>	State of California, Department of Fish and Wildlife (Primary – Facility Owner & Operator) and City of Los Angeles Department of Water and Power (for the limited purpose of <u>inspecting</u> <del>monitoring flow from its</del> <u>supply well pumps and flow measuring equipment</u> )
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**Bate Stamp 6-7 to 6-141**, Insert Headers and Footers for each section as appropriate. Correct spacing and capitalization as appropriate (Attachment J, Bate Stamp 6-121).

## Cass, Jehiel@Waterboards

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**From:** Rubin, Katherine <Katherine.Rubin@ladwp.com>  
**Sent:** Friday, June 05, 2015 4:50 PM  
**To:** Cass, Jehiel@Waterboards  
**Cc:** Sedlacek, Mark; Yoshida, Clayton  
**Subject:** Fish Springs Hatchery NPDES Tentative Permit

Hi Jay,

Per our conversation yesterday, a couple of items that the Los Angeles Department of Water and Power (LADWP) would like to have clarified and changed in the permit regarding the following:

- 1) Calibration for the wells
- 2) LADWP being named as the discharger

After much research and phone calls with both the LADWP and California Fish and Wildlife (CFW) I found out that CFW owns the wells that feed the water to the fish hatchery and CFW reads the flow. The wells are usually always on and are only turned off with the coordination between CFW and LADWP since this will impact the fish at the fishery. LADWP and CFW work together as to when the wells are turned on and off. In addition, CFW does have a backup diesel engine for the wells should power be lost and the motors turned off, CFW operates the backup diesel motor should there be a loss of power. LADWP owns the property and the water, but does not need to provide influent well flow readings to CFW since CFW takes their own reads. The permit is requiring LADWP to provide CFW with flow readings, however, this is not necessary since, as I mentioned before CFW takes their own daily reads. In fact, CFW will contact LADWP when they believe the flow readings are not consistent and/or accurate so that LADWP is aware there may be a problem with the flow meter.

The flow meter is a single propeller meter, known as a spurling meter, that is not calibrated once placed in the field and in use, it is visually observed and this occurs when CFW and LADWP coordinate for this to happen. Coordination is required because the wells must be turned off so that LADWP can make their visual observation. This may or may not happen on an annual basis. The meter when installed has already been calibrated by the manufacture and the calibration is included on the specification sheet. The meter is not calibrated again, it is changed out when needed, and the need to replace the meter is dependent upon the results of the visual observations.

In the tentative permit page E-2 Section I. General Monitoring paragraph B. requires LADWP to monitor the flow and provide the information to the "Discharger". Since CFW takes the daily flow readings, LADWP respectfully requests that this paragraph be changed to reflect that the flow reads are done by CFW. This same paragraph goes on to read that the instrument used to read the flow must include the last calibration date and results. Since the meter is not "calibrated" and visual observations are only taken when coordinated by CFW and LADWP, it is respectfully requested that this sentence be changed to reflect that the visual observations are done when needed.

In paragraph D of the permit, page E-2, Section I. General Monitoring, in this paragraph second paragraph it is stated that the instrument and devices will be properly maintained and "calibrated" as necessary. As mentioned above, since the type of flow meter used at Fish Springs does not require calibration and is replaced when needed, LADWP respectfully requests that the permit be made clear that the flow meter be "visually observed".

With regards to LADWP as the discharger, the permit named LADWP as a discharger due to the limited purpose of monitoring flow from its pumps, however, since LADWP does not provide that information to CFW and CFW does do its own flow readings and all of the required information and compliance with the NPDES permit, with the exception of the

visual observations of the flow meter which is coordinated between CFW and LADWP, is the responsibility of CFW, LADWP respectfully requests that LADWP be removed as the discharger.

I look forward to discussing with you on Monday, as I mentioned on the phone, I am hoping we can come to an agreement before the meeting on Wednesday evening.

Thank you and I appreciate your time, support, and consideration with this matter,

Sincerely,  
Katherine

*Katherine Rubin*

Manager, Wastewater Quality and Compliance  
Los Angeles Department of Water and Power  
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# Agenda Item #6

## Fish Springs Fish Hatchery

### Revised NPDES Permit

June 10, 2015

Jehiel Cass P. E.  
Chief, South Lahontan Regulatory Unit



# Outline

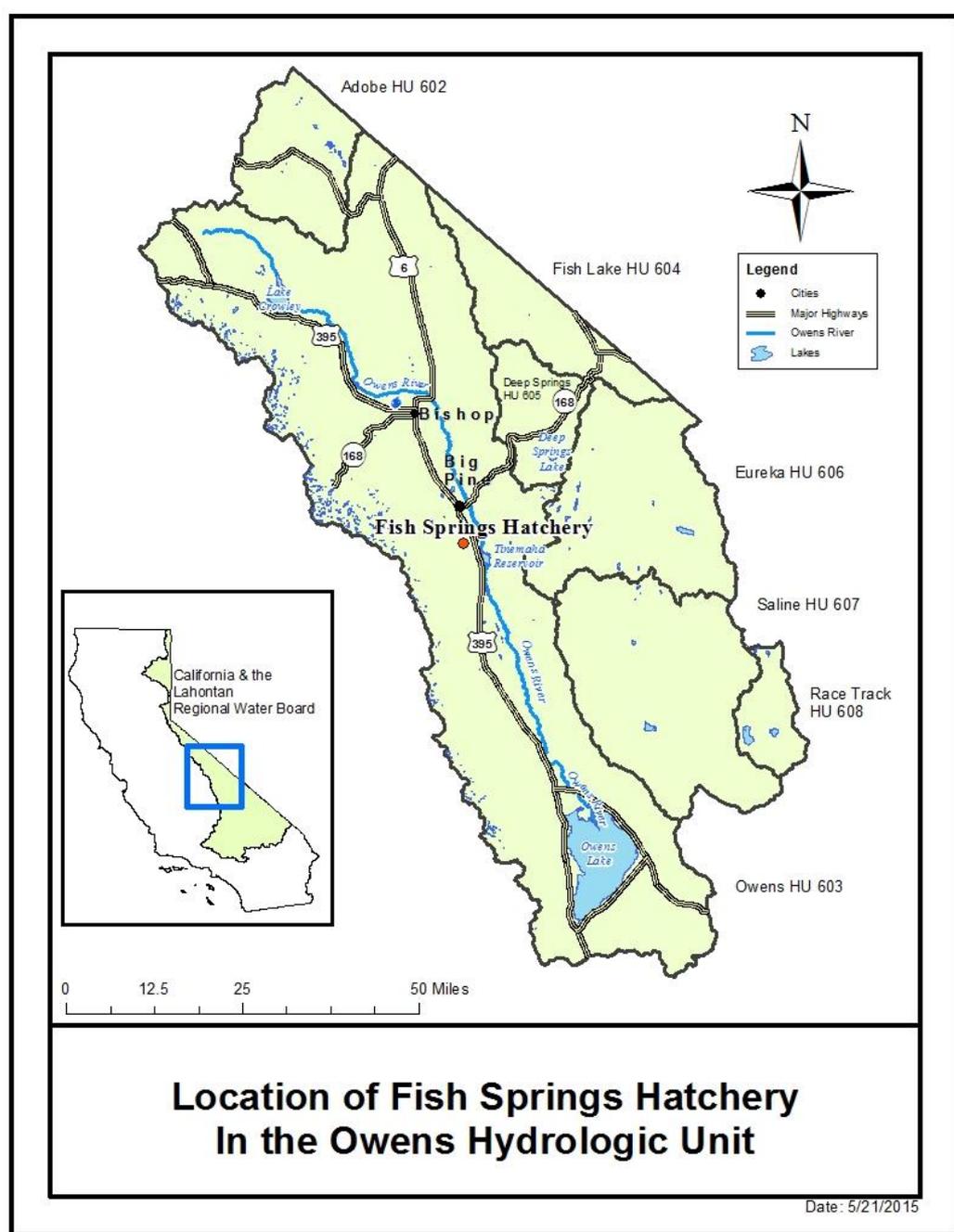
- **Issues**
- **Site Location**
- **Hatchery Operations**
- **Permit History**
- **Comments - City of Los Angeles Department of Water and Power**
- **Comments - California Department of Fish and Wildlife**
- **Changes from Previous Permit**
- **Recommendation**

# Issues

- Should the Board renew the Fish Springs Hatchery NPDES Permit last revised in 2006?
- Should the Board name the City of Los Angeles as Discharger for limited liability?

# General Location

## Fish Springs Hatchery



Fish Springs Fish Hatchery

Sign in

Owens River

Fish Springs Creek

Fish Springs

Tinemaha Reservoir

Birch Creek

Tinemaha Creek



# Fish Springs Hatchery Operations

- Land owned by LA DWP
- CA DFW owns hatchery
- Fish Springs now dry
- Supply wells owned by CA DFW
- Wells operated by the LA DWP

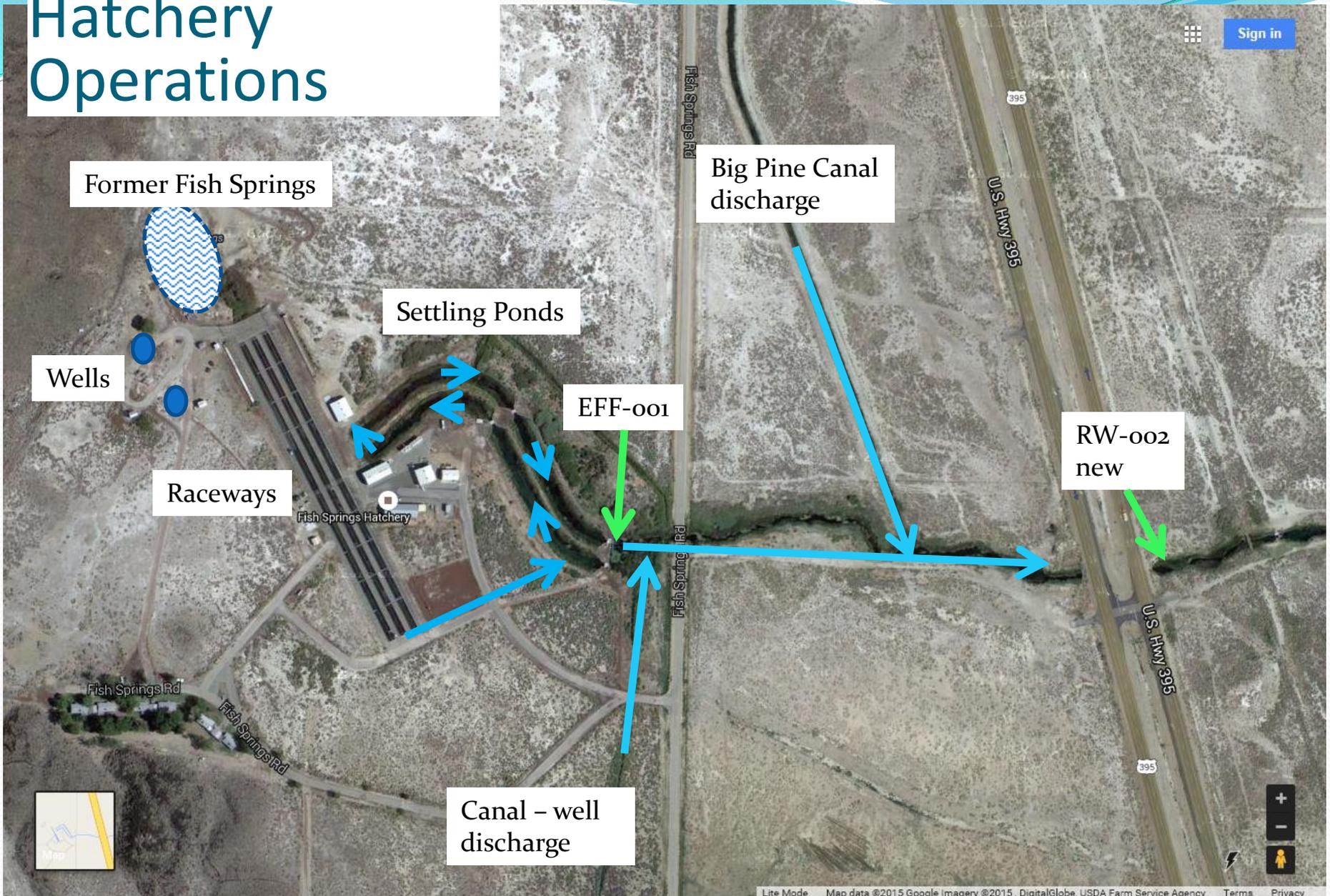


# Fish Springs Hatchery Operations

- Flow-Through operation
- Two wells provide 8 – 26 MGD of water
- Produces up to 900,000 lb/yr
- Discharge forms headwater of Fish Springs Creek



# Hatchery Operations



# Permit History

- **R6V-2006-0030 – current permit**
  - NPDES permit renewal required every 5 years
  - 2011 - Tentative permit withdrawn because US EPA objected and believed Site Specific Water Quality Objectives needed for Fish Springs Creek
  - 2015 – Tentative permit reissued
  - New permit requires data collection to establish future site specific objectives

# Comments - Los Angeles DWP

- Does not want to be named as Discharger
- Order limits DWP liability to only inspecting the supply well pumps and flow measuring equipment

# Comments - California DFW

- Remove Orthophosphate effluent limitation
  - Removes - No Reasonable Potential to exceed RW limit
- Remove Potassium Permanganate effluent limitation
  - Retains - Reasonable Potential to exceed Eff limit
- CA DFW does not control supply wells
  - Requires LA DWP to provide relevant information regarding supply well pumps and flow measuring equipment
- A-typical to monitor receiving water for inorganic constituents for Site Specific Objectives at R-002
  - Data will allow staff to calculate new objectives
  - Data collection intended for 5-yr period only

# Changes from Previous Permit

- Effluent Limitations removed for:
  - Copper
  - Orthophosphate
- Intake Credits allowed – maximum, not to exceed supply
  - Nitrate
  - Total Nitrogen
  - Total Dissolved Solids
- New Receiving Water Station – R-002
  - Fish Springs Creek at Highway 395 bridge, down stream of hatchery discharge, small canal and Big Pine Canal
- LA DWP – named as Discharger, limits responsibility

# Recommendation

- Adoption as Proposed with Late Revision:
  - Clarification of DWP responsibility
  - Corrected format for headers, capitalization, and spacing



Settling Ponds



Fish Springs Creek