



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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STEPHEN R. MAGUIN  
Chief Engineer and General Manager

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File No. 31-370-40.4A

Mr. Man Voong  
California Regional Water Quality Control Board  
Los Angeles Region  
320 W. 4th Street, Suite 200  
Los Angeles, CA 90013

Dear Mr. Voong:

**Comments on the Proposed Amendment to the  
Water Quality Control Plan for the Los Angeles Region  
to Incorporate a TMDL for Bacteria in the Los Angeles River**

The Sanitation Districts of Los Angeles County (Sanitation Districts) are pleased to submit comments to the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) on the proposed amendment to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) for incorporation of a total maximum daily load for bacteria in the Los Angeles River (LA River Bacteria TMDL). By way of background, the Sanitation Districts provide wastewater and solid waste management services to over 5 million people in 78 cities and unincorporated areas of Los Angeles County. Of the 11 wastewater treatment plants owned and operated by the Sanitation Districts, nine are located within the boundaries of the Regional Board. These facilities are located in the San Gabriel River, Rio Hondo, Santa Clara River, and Santa Monica Bay watershed.

The Sanitation Districts have reviewed the tentative LA River Bacteria TMDL and corresponding Staff Report and have a concern about ambiguity in the language assigning waste load allocations (WLAs) for Water Reclamation Plants (WRPs). The LA River Bacteria TMDL assigns WLAs to three WRPs discharging in the LA River Watershed based on the current effluent discharge limitations placed on these WRPs, which require compliance with a 7-day median number of total coliforms in the effluent not to exceed 2.2 per 100 milliliters.

Although the Staff Report and the NPDES permits for the WRPs refer to a 7-day median, it is not mentioned in the Staff Report for the LA River Bacteria TMDL or the proposed WLAs, which only include reference to a 2.2 MPN/100 mL WLA. This could be interpreted to be an instantaneous maximum, which is substantially different from the current bacteria effluent limitations in the WRP NPDES permits. This discrepancy is easily corrected by the addition of the phrase "a 7-day median of" as follows:

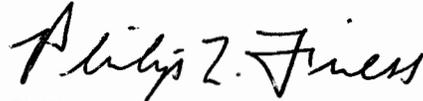
"The WLAs for the three WRPs in the watershed, which include D.C. Tillman, Los Angeles-Glendale, and Burbank WRP, are set equal to a 7-day median of 2.2 MPN/100 mL of *E. coli* multiplied by the discharge rate at the time of sampling to ensure zero (0) days of allowable exceedances of the single sample target for both dry and wet weather and no exceedances of the geometric mean target."

It is also recommended that the Implementation section of the TMDL be amended to specifically state that no revisions to the WRP NPDES permits are necessary based on this TMDL.

Thank you for the opportunity to comment on this important issue. If you have any questions or require additional information about the comments contained herein, please contact Ken Hoffman of my staff at (562) 908-4288, extension 2445, or khoffman@lacs.org.

Very truly yours,

Stephen R. Maguin

A handwritten signature in black ink that reads "Philip L. Friess". The signature is written in a cursive style with a large initial 'P' and a distinct 'L'.

Philip L. Friess  
Department Head  
Technical Services

PLF:KMH:lmb