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March 19, 2015

Mr. Samuel Unger, Executive Officer  
Los Angeles Regional Water Quality Control Board  
320 West Fourth Street, Suite 200  
Los Angeles, CA 90013  
Via email: [Samuel.Unger@waterboards.ca.gov](mailto:Samuel.Unger@waterboards.ca.gov); [David.Hung@waterboards.ca.gov](mailto:David.Hung@waterboards.ca.gov);  
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**Re: Comments on Tentative Waste Discharge Requirements (WDRs)/National Pollutant Discharge Elimination System (NPDES) Permit - Santa Clarita Valley Sanitation District of Los Angeles County (SCVSD), Saugus Water Reclamation Plant (NPDES No. CA0054313, CI-2960)**

Dear Mr. Unger:

On behalf of Heal the Bay, I submit the following comments to the Los Angeles Regional Water Quality Control Board ("Regional Board") on the tentative renewal of waste discharge requirements for the Santa Clarita Valley Sanitation District of Los Angeles County (SCVSD), Saugus Water Reclamation Plant (NPDES No. CA0054313, CI-2960) ("Permit"). Heal the Bay is an environmental organization with over 15,000 members dedicated to making Southern California coastal waters and watersheds safe, healthy, and clean for people and aquatic life.

**I. Numeric Chronic Toxicity Effluent Limits Must be Included**

Heal the Bay has long-advocated for the development and implementation of the State Water Resources Control Board toxicity policy. There is no clear indication from the State Water Board as to when, if ever, the policy will be released for public comment. Meanwhile, our state's waters continue to suffer from toxicity impairments. As such, the Regional Boards cannot wait any longer to implement numeric toxicity effluent limits. Although the statewide toxicity policy has yet to be adopted, the Regional Board's inclusion of numeric water quality based effluent limits for chronic toxicity in the Permit is a necessary step to protect coastal waters. We support the Regional Board's inclusion of numeric chronic toxicity effluent limits in the Permit as it is critical for NPDES permittees to ensure that their discharge does not have toxic impacts. Furthermore, we support the inclusion of the Test of Significant Toxicity ("TST") approach in the Permit.

Over the last 12 months, numerous NPDES permits in Region Four have been adopted that included numeric chronic toxicity effluent limits.<sup>1</sup> It is critical that this Permit follow suit and include numeric chronic toxicity limits. Over ten years have passed since the State Water Resources Control Board began modifying the toxicity statewide implementation plan. It is inappropriate to wait any further for the revised draft statewide implementation plan to be released to incorporate numeric chronic toxicity effluent limits into NPDES permits. The language in the Permit complies with narrative water quality standards for toxicity in the Basin Plan. In addition, excluding numeric chronic toxicity limits from the Permit would be inconsistent with recent NPDES permits adopted by this Board. Toxicity testing is the "safety net" to

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<sup>1</sup> See Honeywell International, Inc., Gardena Groundwater Remediation system Facility (NPDES No. CA0062162); Camarillo Water Reclamation Plant (NPDES No. CA0053597); Simi Valley Water Quality Control Plant (NPDES No. CA0055221); Hill Canyon Wastewater Treatment Plant (NPDES No. CA0056294); Pomona Water Reclamation Plant and Whittier Narrows Water Reclamation Plant (NPDES No. CA0053716).



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identify toxic impacts to aquatic life - it is important that all future NPDES permits include steadfast and enforceable numeric chronic toxicity limits.

Thank you for this opportunity to provide comments at this time. If you have any questions please contact Peter Shellenbarger at (310) 451-1500 ext. 189.

Sincerely,

Peter Shellenbarger, MESM  
Water Resources Manager  
Heal the Bay