

Los Angeles Regional Water Quality Control Board

April 30, 2015

Ms. Susan Salinas
Director, Safety & Environmental
Teleflex Incorporated
3085 Old Conejo Rd.
Newbury Park, CA 91320

Dear Ms. Salinas:

RESPONSE TO COMMENT ON THE REVISED TENTATIVE WASTE DISCHARGE REQUIREMENTS AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT FOR TFX AVIATION, INC., TFX AVIATION, INC. FACILITY, NEWBURY PARK CA. (NPDES NO. CA0064599, CI NO. 9544)

Our letter dated April 27, 2015, transmitted the Response to Comments and revised pages of the tentative Waste Discharge Requirements (WDRs) to TFX Aviation, Inc. Unfortunately, staff neglected to respond to one of your comments raised in the comment letter dated April 15, 2015. We received your subsequent comment on April 29, 2015, via email, regarding the revised tentative Monitoring and Reporting Program (Attachment E). Following is the summary of the comment received (printed in italics) and our response. Regional Water Board staff evaluated the comment and, as appropriate, has made revisions to the revised tentative Attachment E. Additions are underlined. Enclosed please find the revised pages of the revised tentative Attachment E.

Comment:

1. TCDD Sampling

We have completed our review of the Tentative NPDES permit and the changes you made. Although we were hopeful that the TCDD sampling for the upstream receiving water would be as we discussed in the call (which was to sample for 2 or 3 years and if no impacts were noted – no further sampling would be required), we do not plan on contesting the Permit as written. We appreciate the opportunity to provide input on the Permit before it was finalized...

Response:

Staff evaluated the comment, and agreed to make changes in Section VIII.A.1. in the revised tentative Attachment E. A footnote 7 has been added in Section VIII.A.1 (Table E-1) that reads as follows:

Table E-1. Receiving Water Monitoring Requirements-RSW-001

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
.....				
TCDD Equivalents ⁶	µg/L	Grab	1/Year ⁷	³

⁷ If the results of the analyses for 2 consecutive years indicate that TCDD equivalents are not detected, no further monitoring is required. If TCDD equivalents are detected, monitoring continues annually.

In accordance with administrative procedures, this Board at a public hearing to be held on May 14, 2015, at 9:00 A.M., at Metropolitan Water District of Southern California, 700 North Alameda Street, Los Angeles, California, will consider the enclosed revised tentative requirements and comments submitted in writing regarding any and all portions thereof. The Board members will hear any testimony pertinent to this discharge and the tentative requirements. It is expected that the Board will take action at the hearing; however, as testimony indicates, the Board, at its discretion, may order further investigation.

If you have any questions, please contact Rosario Aston at (213) 576-6653.

Sincerely,



Cassandra D. Owens, Chief
Industrial Permitting Unit (NPDES)

Enclosures

cc: See mailing list

Mailing List (Via Email Only)

Ms. Robyn Stuber, Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Ms. Becky Mitschele, Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Mr. Kenneth Wong, U.S. Army Corps of Engineers
Mr. Bryant Chesney, NOAA, National Marine Fisheries Service
Mr. Jeff Phillips, Department of Interior, U.S. Fish and Wildlife Service
Mr. William Paznokas, Department of Fish and Wildlife, Region 5
Ms. Kurt Souza, State Water Resources Control Board, Drinking Water Division
Ms. Teresa, Henry, California Coastal Commission, South Coast Region
Mr. Theodore Johnson, Water Replenishment District of Southern California
Mr. Tim Smith, Los Angeles County, Department of Public Works, Waste Management
Division
Mr. Angelo Bellomo, Los Angeles County, Department of Public Health
Mr. Scott Ward, Department of Toxic Substances Control, Sacramento, CA
Mr. Robert Wu, Department of Transportation (Caltrans)
Mr. Gerhardt Hubner, County of Ventura, Flood Control District
Ventura Port District Harbor Patrol
Ms. Vicki Musgrove, City of San Buenaventura
City of San Buenaventura, Parks and Recreation
Sierra Club, Southern Coastal Coordinator
Mr. Mati Waiya, Ventura CoastKeeper
Friends of the Ventura River
Mr. Paul Jenkin, Surfrider Foundation, Ventura County Chapter
Ms. Jessica Altstatt, Santa Barbara Channel Keeper
Ms. Betsy Weber, Environmental Defense Center
City of Thousand Oaks
City of Simi Valley
City of Oxnard
Mr. Peter Shellenbarger, Heal the Bay
Ms. Liz Crosson, Los Angeles WaterKeeper
Ms. Johanna Dyer, Natural Resources Defense Council
Ms. Sally Bilodeau, AECOM
Mr. Stephen L. Backus, Backus, Bland, Navarro & Weber LLP
Mr. Shawn D. Moradian, Executive Vice President, NASS Properties
Mr. Damon Wing, Ventura County
Ms. Kristy Allen, Tetra Tech

**TFX Aviation, Inc.
TFX Aviation Inc., Facility , Newbury Park
(NPDES NO. CA0094599)**

**REVISED TENTATIVE
MONITORING AND REPORTING PROGRAM
(Pages E-13, and E-14)**

- b. Water quality measurements for each toxicity test (e.g., pH, dissolved oxygen, temperature, conductivity, hardness, salinity, chlorine, ammonia).
- c. TRE/TIE results. The Regional Water Board Executive Officer shall be notified no later than 30 days from completion of each aspect of TRE/TIE analyses.
- d. Statistical program (e.g., TST calculator, CETIS, etc.) output results for each toxicity test.

VI. LAND DISCHARGE MONITORING REQUIREMENTS – NOT APPLICABLE

VII. RECYCLING MONITORING REQUIREMENTS – NOT APPLICABLE

VIII. RECEIVING WATER MONITORING REQUIREMENTS

A. Surface Water - Monitoring Location RSW-001

1. The Discharger shall monitor the South Fork of Arroyo Conejo at RSW-001 as follows:

Table E-3. Receiving Water Monitoring Requirements-RSW-001

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Stream Flow	cfs	Recorder	1/Quarter ¹	
Priority Pollutants	µg/L	Grab	1/Year ²	3
pH ⁵	standard units	Grab	1/Year ⁴	3
Temperature ⁵	°F	Grab	1/Year ⁴	3
Hardness (as CaCO ₃)	mg/L	Grab	1/Year ⁴	3
TCDD Equivalents ⁶	µg/L	Grab	1/Year ⁷	3

¹ Concurrent with effluent sampling for copper and nickel. Also, see **Item VIII.A.2. below.**

² Priority Pollutants as defined by the CTR, defined in Attachment I of this Order.

³ Pollutants shall be analyzed using the analytical methods described in 40 CFR section 136; for priority pollutants the methods must meet the lowest minimum levels (MLs) specified in Appendix 4 of the SIP and included as Attachment H in this Order. If no methods are specified for a given pollutant, it shall be analyzed by methods approved by this Regional Water Board or the State Water Board. If more than one analytical test method is listed for a given parameter, the Discharger must select from the listed methods and corresponding ML.

⁴ Receiving water pH, hardness, and temperature must be analyzed at the same time the samples are collected for Priority Pollutants analysis.

⁵ The analysis may be conducted by a field technician or chemist from an ELAP certified laboratory provided that the personnel receives proper training and follows laboratory SOPs for field sampling and analysis. Documentation for calibration of instruments and records of analysis shall be clearly noted and included in the monitoring report.

⁶ TCDD equivalents shall be calculated using the following formula, where the Minimum Levels (ML), and toxicity equivalency factors (TEFs) are provided in the Table below. The Discharger shall report all measured values of individual congeners, including data qualifiers. When calculating TCDD equivalents the Discharger shall set congener concentrations below the minimum levels to zero. U.S. EPA method 1613 may be used to analyze dioxin and furan congeners.

$$\text{Dioxin-TEQ (TCDD equivalents)} = \sum(Cx \times \text{TEF}_x)$$

where: Cx = concentration of dioxin or furan congener x
TEF_x = TEF for congener x

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Minimum Levels, and Toxicity Equivalency Factors

Congeners	Minimum Level (pg/L)	Toxicity Equivalence Factor (TEF)
2,3,7,8 - tetra CDD	10	1.0
1,2,3,7,8 - penta CDD	50	1.0
1,2,3,4,7,8 - hexa CDD	50	0.1
1,2,3,6,7,8 - hexa CDD	50	0.1
1,2,3,7,8,9 - hexa CDD	50	0.1
1,2,3,4,6,7,8 - hepta CDD	50	0.01
Octa CDD	100	0.0001
2,3,7,8 - tetra CDF	10	0.1
1,2,3,7,8 - penta CDF	50	0.05
2,3,4,7,8 - penta CDF	50	0.5
1,2,3,4,7,8 - hexa CDF	50	0.1
1,2,3,6,7,8 - hexa CDF	50	0.1
1,2,3,7,8,9 - hexa CDF	50	0.1
2,3,4,6,7,8 - hexa CDF	50	0.1
1,2,3,4,6,7,8 - hepta CDFs	50	0.01
1,2,3,4,7,8,9 - hepta CDFs	50	0.01
Octa CDF	100	0.0001

⁷ If the results of the analyses for 2 consecutive years indicate that TCDD equivalents are not detected, no further monitoring is required. If TCDD equivalents are detected, monitoring continues annually.

2. The Discharger may submit stream flow data collected by the Ventura County Watershed Protection District (VCWPD) and/or other entities acting on behalf of the agency from the gauging station in the South Fork of Arroyo Conejo located closest to RSW-001 in lieu of conducting the receiving water monitoring for the stream flow data. The analytical data shall include type of the instrument used in collecting the stream flow data, applicable analytical methods used in calculating the flow rate, including but not limited to date and time of monitoring, and name of person who performed the monitoring. If possible, the collection of stream flow data shall be concurrent with the effluent sampling for copper and nickel. If the stream flow data is not available during the reporting period, the Discharger shall submit the data as soon as it is obtained from VCWPD. The reason(s) why the stream flow data is not reported during the quarter shall be stated in the monitoring report. In addition, if there is no stream flow during the reporting period, the report shall so state.

The Discharger may coordinate with VCWPD to obtain permission to access the channel of the South Fork of Arroyo Conejo to collect the receiving water samples for priority pollutants, pH, temperature, and hardness at RSW-001.

B. Groundwater Monitoring

Not applicable.

IX. OTHER MONITORING REQUIREMENTS

A. Storm Water Monitoring

Not applicable.

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