

From: Stuber, Robyn [<mailto:Stuber.Robyn@epa.gov>]
Sent: Monday, February 06, 2017 4:29 PM
To: Morris, Cris@Waterboards
Cc: Smith, Deborah@Waterboards; Hung, David@Waterboards; Smith, DavidW
Subject: U.S. EPA comments - NPDES permits for D.C. Tillman, L.A. Glendale and Burbank POTWs

Dear Ms. Morris,

Thank you for the opportunity to review the draft NPDES permits for D.C. Tillman, L.A. Glendale and Burbank POTWs, publicly noticed on January 5, 2017. We have reviewed portions of the draft permits and have the following comments.

Water Quality-based Effluent Limits

We agree with the reasonable potential determinations and proposed effluent limits for non-TMDL conventional, non-conventional and toxic pollutants. As with the previous permits and the U.S. EPA-approved copper and ammonia-nitrogen TMDL provisions for these POTWs, we support the proposed water quality-based effluent limits (WQBELs) for copper and ammonia-nitrogen. The fact sheets document how, during this permit term, the proposed WQBELs for copper and ammonia-nitrogen will plainly and clearly maintain and improve water quality in these reaches of the Los Angeles River watershed by protecting water quality standards (aquatic life objectives and anti-degradation) both during wet weather periods and when in-stream flows are dominated by effluent discharges from these POTWs. In conjunction, we believe that the anti-backsliding and anti-degradation analyses routinely conducted by permit writers during NPDES permit reissuance gives the Regional Water Board flexibility to consider additional information that may lead to less stringent WQBELs for these TMDL pollutants in subsequent permits.

D.C. Tillman POTW

During review of the D.C. Tillman draft permit, we noted a few provisions that should be clarified or corrected in the final permit. Order Table 2, Attachments B-1, B-2 and C, and fact sheet section II.B should be updated to clarify the physical location of each authorized NPDES discharge point. The fact sheet's calculations for the ammonia-nitrogen MDEL (page F-37) and proposed MDEL (Table F-8) should be cross-walked and clarified. The fact sheet's reasonable potential analysis for cadmium should be clarified; a dry weather WQBEL for cadmium is required if the reported maximum effluent concentration (13 ug/l) is a dry weather measurement that exceeds the applicable water quality criterion. For consistency and clarity, we recommend revising Order Table 4 footnote 10 to read as footnote 10 for wet weather in the L.A. Glendale and Burbank orders.

We urge adoption of final permits incorporating the revisions, above. If you have questions regarding these comments, please contact me directly.

Sincerely,
Robyn Stuber, Physical Scientist
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