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February 3, 2017

Mr. Sam Unger, Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, California 90013

Attention: Cris Morris, Unit Lead
Municipal Permitting Unit (NPDES)

Dear Mr. Unger:

COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS (WDR) AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) - CITY OF LOS ANGELES, D. C. TILLMAN WATER RECLAMATION PLANT, NPDES PERMIT NO. CA0056227, CI-5695

On January 6, 2017, the California Regional Water Quality Control Board – Los Angeles Region (Regional Water Board) released the D. C. Tillman Water Reclamation Plant (DCTWRP) Tentative Order (NPDES No. CA0056227), Fact Sheet, Monitoring and Reporting Program. The City of Los Angeles, Bureau of Sanitation (LASAN) appreciates the opportunity to provide the following comments and recommendations to the Regional Water Board. LASAN staff will be present to provide oral comments at the Regional Water Board public hearing on March 2, 2017.

While LASAN appreciates the Regional Water Board's staff for their efforts in developing the Tentative Order, there are several areas with which LASAN has concerns and hopes that these technical comments will result in constructive changes to the permit. LASAN's comments, concerns, and proposed revisions are detailed in Attachment A.

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CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

zero waste • one water

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

Recyclable and made from recycled waste



Mr. Sam Unger
February 3, 2017
Page 2 of 2

LASAN is looking forward to working with Regional Water Board staff to renew the DCTWRP NPDES Permit. If you have any questions regarding the LASAN's comments, please contact Mr. Hassan Rad, Division Manager at (213) 847-5186 of the Regulatory Affairs Division.

Sincerely,



ENRIQUE C. ZALDIVAR, Director
LA Sanitation

SN/HR:es

Attachment: Attachment A – Detailed Discussion of Comments

c: David Hung, Regional Water Quality Control Board – Los Angeles Region
Elizabeth Erickson, Regional Water Quality Control Board – Los Angeles Region
Traci Minamide, LASAN/EXEC
Robert Irvin, LASAN/EXEC
Roshanak Aflaki, LASAN/DCTWRP
Mas Dojiri, LASAN/EMD
Ali Poosti, LASAN/WESD
Barry Berggren, LASAN/WCSD
Shahram Kharaghani, LASAN/WPD
Michael Simpson, LASAN/IWMD
Hassan Rad, LASAN/RAD
Michael Ruiz, LASAN/DCTWRP

LASAN Comments on the 2017 DCTWRP Tentative NPDES Permit

Detailed Comment #	Document Reference : (Doc. #, Section #, Page #)	Issue	Comments
1.	Order, Table 2	Discharge Point No. Designation and coordinates	<p>1. DCTWRP has four Discharge Point Names (001, 002, 003, and 008). The new designation Discharge Point No. 001 listed in Table 2 might be confused with the old and inactive Discharge Point Name 001. Discharge Point Name 001 is a legacy designation for the original outfall at the LA River.</p> <p>LASAN requests that Discharge Point No. 001 be changed to Discharge Point No. 001A</p> <p>2. Table 2 contains incorrect coordinates.</p> <p>LASAN requests to change the coordinates to: Latitude (North) 34.18025, Longitude (West) -118.48028</p>
2.	Order, Document Header	Consistent document header	<p>The Header in the Table of Contents is not consistent with the rest of the document.</p> <p>LASAN recommends changing and using the Header: <i>"Donald C. Tillman Water Reclamation Plant"</i> in the entire document.</p>
3.	Order, Section IV.A.1.a, Table 4, Page 5	Retain Turbidity narrative language	<p>The tentative permit removed the narrative language on turbidity when it was placed in Table 4.</p> <p>LASAN requests to place a reference footnote on Turbidity and retain the narrative language as the footnote:</p> <p><i>"For the protection of the water contact recreation beneficial use, the wastes discharged to water courses shall have received adequate treatment, so that the turbidity of the wastewater does not exceed any of the following: (a) an average of 2 Nephelometric turbidity units (NTUs) within a 24-hour period; (b) 5 NTUs more than 5 percent of the time (72minutes) within a 24-hour period; and (c) 10 NTU at any time."</i></p>

LASAN Comments on the 2017 DCTWRP Tentative NPDES Permit

Detailed Comment #	Document Reference : (Doc. #, Section #, Page #)	Issue	Comments
4.	Order, Section IV.A.1.a, Table 4, Page 5	Retain Temperature narrative language	<p>The tentative permit removed the narrative language on temperature when it was placed in Table 4.</p> <p>LASAN requests to place a footnote on Temperature and retain the narrative language as the footnote:</p> <p><i>"The temperature of wastes discharged shall not exceed 86 F except as a result of external ambient temperature."</i></p>
5.	Order, Section IV.A.1.a, Table 4, Page 6	Radioactivity annual average	<p>According to the tentative permit, radioactivity limits are "specified in Title 22, chapter 15, article 5, sections 64442 and 64443, of the California Code of Regulations (CCR), or subsequent revisions". Accordingly, compliance with radioactivity should be based on running annual average or annual average.</p> <p>LASAN requests that radioactivity limits be changed from monthly average to annual average.</p>
6.	Order, Section IV.A.1.a, Table 4, Page 6, Footnote 4	Typo error in Footnote 4	<p>Footnote 4 refers to the wrong treatment plant.</p> <p>LASAN requests to correct "<i>The WLAs for LAGWRP <u>DCTWRP</u> is set equal to a ...</i>"</p>
7.	Order, Section IV.A.1.a, Table 4, Page 7-8	Formatting Footnotes 9,10,11 And 12, 13	<p>LASAN requests that there should be a comma between reference footnotes.</p> <p>LASAN requests the following correction: Cadmium (wet weather)^{9,10,11}, should be ^{9,10,11}. Copper (year round)^{9,10,11}, should be as ^{9,10,11}. Lead (year round)^{9,10,11}, should be ^{9,10,11}. Chronic Toxicity^{12,13} should be ^{12,13}.</p>
8.	Order, Section IV.A.1.a, Table 4, Page 7	Footnote 10 not applicable to copper and lead	<p>Footnote 10 applies to wet-weather limits and does not apply to copper and lead since their limits are year round.</p> <p>LASAN requests to remove footnote 10 on copper and lead in Table 4.</p>
9.	Order, Section IV.A.1.a, Table 4, Page 7	Effluent limits for metals reduced	<p>Cadmium, lead, and selenium effluent limits have decreased significantly compared to the 2011 permit.</p> <p>LASAN requests to review the basis for the calculations of these limits.</p>

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Detailed Comment #	Document Reference : (Doc. #, Section #, Page #)	Issue	Comments
10.	Order, Section IV.A.1.a, Page 7	Footnote 10 description	<p>USGS Station 11087020 is located in the San Gabriel River at Whittier Narrows. LASAN requests to correct footnote 10 and remove USGS Station 11087020 and add monitoring location name to:</p> <p><i>"This effluent limitation does not apply during dry-weather when the maximum daily flow measured at <u>Receiving Water Monitoring Location RSW-003D (also known as Los Angeles Department of Public Works' Wardlow Gage Station No. F319-R)</u> USGS Station 11087020 is less than 500 cubic feet per second."</i></p>
11.	Order, Section IV.A.1.a, Table 4, Page 8	Heptachlor spelling	<p>LASAN requests to correct the spelling from "heptaclor" to "heptachlor" throughout the document.</p>
12.	Order, Section V.A.19, Page 10	Chronic toxicity in receiving waters	<p>LASAN noticed that some of the language contained in the previous permit has been moved around, including the language on "Chronic Toxicity Narrative Receiving Water Quality Objective".</p> <p>LASAN requests that the paragraphs "c" and "d" from the previous 2011 permit be added back into the 2017 tentative permit:</p> <p><i>c. If the chronic toxicity median monthly threshold in the receiving water at the monitoring station(s) immediately downstream of the discharge is not met and the toxicity cannot be attributed to upstream toxicity, as assessed by the Permittee, then the Permittee shall initiate accelerated monitoring.</i></p> <p><i>d. If the chronic toxicity median monthly threshold of the receiving water at upstream and downstream stations is not met, but the effluent chronic toxicity median monthly effluent limitation was met, then accelerated monitoring need not be implemented.</i></p>
13.	Order, Section VI.A.2.z, Page 13	Requirement to submit feasibility study on water recycling	<p>The tentative permit requires permittee to <i>"investigate the feasibility of additional recycling, efforts to reduce the amount of treated effluent discharged via this NPDES Order...the permittee shall submit this feasibility study as part of the submittal of the Report of Waste Discharge (ROWD) for the next permit renewal."</i></p> <p>LASAN supports water recycling projects in all of its treatment plants. However, LASAN requests that the feasibility study on water recycling should not be mandatory as a requirement, but should just be recommendatory.</p>

LASAN Comments on the 2017 DCTWRP Tentative NPDES Permit

Detailed Comment #	Document Reference : (Doc. #, Section #, Page #)	Issue	Comments
14.	Order, Section VI.C.1.n, Page 15	Reopener clause	<p>The tentative permit characterizes the ammonia and copper limits as water quality based effluent limits (WQBELs) even though these limits are not based on water quality objectives and are solely based on performance. Thus, these are more appropriately characterized as performance based effluent limits (PBELs).</p> <p>Although the City may be able to meet the proposed PBELs currently, the concern is that this will not be true in the future. While the City appreciates the addition of a reopener, this reopener will not protect the City from MMPs should the PBEL be exceeded for reasons beyond its control. Further, the City wants to make sure that there are no future backsliding issues related to these performance-based limits should performance differ in the future.</p> <p>To address these concerns, the LASAN requests the following minor changes be made to the reopener provisions of the permit and fact sheet.</p> <p><i>"This NPDES permit may be reopened for modification to recalculate the final water quality based effluent limitations for Ammonia as Nitrogen and/or Copper, to incorporate a revised margin of safety factor reflective of plant performance consistent with <u>and up to the maximum limits allowed by the applicable TMDLs and SSOs, if the discharger provides new information to the Regional Board showing the flow conditions or other extenuating circumstances cause a significant change in the water reclamation plant's treatment performance.</u>"</i></p>
15.	Order, Section VI.C.6.b.i, Page 20	Coliform analysis during spills	<p>For spills that reach marine waters, the tentative permit states "that the Permittee shall analyze for total coliform, fecal coliform and enterococcus".</p> <p>The US EPA's 2012 recommendations are to use enterococci as a sole indicator of REC 1 contact standards, due to numerous studies which have shown that enterococcus are the most accurate and protective of human health in marine waters. The State Water Resources Control Board also recommends that enterococci should be used as the sole indicator in marine waters. The use of total coliform and fecal coliform to assess the risk to human health in marine waters is not supported by US EPA studies and is therefore un-necessary and not as protective of human health as enterococci testing.</p> <p>Therefore, LASAN requests to remove total coliform and fecal coliform and retain only the analysis of enterococcus.</p>

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Detailed Comment #	Document Reference : (Doc. #, Section #, Page #)	Issue	Comments
16.	Attachment B, Page B-1	Location of RSW614	<p>The location of RSW614 is not correct in the map. RSW614 correct location is just south of Victory Blvd.</p> <p>LASAN will correct the map and submit it to the Regional Water Board.</p>
17.	Attachment E, Section I.H, Page E-3	ML, RL	<p>The tentative permit states that <i>"When there is deviation from the method analytical procedures, such as dilution or concentration of samples, other factors may be applied to the ML depending on the sample preparation. The resulting value is the reported ML."</i></p> <p>The MDL and RL are the values required to be reported - as stated in the first sentence. Then it goes on to tell how to compute the RL. The resulting value is the RL.</p> <p>LASAN requests that the last sentence be changed to: <i>"The resulting value is the reported ML RL."</i></p>
18.	Attachment E, Section II, Table E-1, Page E-5	EFF-001A coordinates	<p>Table E-1 contains incorrect coordinates for EFF-001A.</p> <p>LASAN requests to change the coordinates to: Latitude (North) 34.18025, Longitude (West) -118.48028</p>
19.	Attachment E, Section II, Table E-1, Page E-5	Consistency in receiving water location naming convention	<p>The previous naming convention of RSW-LATT has been changed and shortened to just RSW in this tentative permit compared to the 2011 DCTWRP permit. In addition, the 2017 LAGWRP tentative permit has kept the RSW-LAGT naming convention.</p> <p>LASAN requests that the naming convention be consistent between DCTWRP and LAGWRP - either retain the naming convention RSW-LATT or change RSW-LAGT in the 2017 LAGWRP tentative permit.</p>
20.	Attachment E, Section II, Table E-1, Page E-6	Receiving water location RSW630 naming convention and coordinates	<p>1. The naming convention of RSW630 has changed in this tentative permit.</p> <p>LASAN requests that monitoring location name RSW 630 be revised to RSW 630 (R-7) to be consistent with the naming convention of the other receiving water monitoring location names in this tentative permit.</p> <p>2. LASAN requests to correct coordinates to: Latitude (North) 34.16174, Longitude (West) -118.46641</p>

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Detailed Comment #	Document Reference : (Doc. #, Section #, Page #)	Issue	Comments
21.	Attachment E, Section II, Page E-6, Paragraph 2	Discharge Point name	<p>The tentative permit states that, "Discharge Serial Numbers 001, 002, 003, 004, 005 and 008 were included in previous Orders, but are not listed here because the NPDES compliance points are EFF-001A and EFF-001B. These other outfall structures discharge after the effluent mingles with other surface waters."</p> <p>LASAN still reports 002, 003, and 008 on the Discharge Monitoring Reports for DCTWRP. Since this Order is removing these other Discharge Points from the permit LASAN requests that these points be removed from the DMR reports and the DMR report be updated to just the Discharge Point No. 001A. [Also, see LASAN request in Comment #1]</p>
22.	Attachment E, Section II, Table E-1, Page E-6	Receiving water location RSW-003D coordinates	LASAN requests to correct the coordinates to: Latitude (North) 33.81598, Longitude (West) -118.20552
23.	Attachment E, Section IV, Page E-8	Incorrect statement on EFF-001A and 001B	<p>The following statement at the top of Page E-8 is incorrect.</p> <p>LASAN requests to correct the language to:</p> <p><i>"The sampling location for the effluent discharge to the Los Angeles River is EFF-001A and <u>for bacteria</u> is EFF-001B. for the discharge to the recycled water pipelines."</i></p>
24.	Attachment E, Section IV.A, Page E-9	Correct Footnote 22	<p>The tentative permit states that, "The Permittee shall extract the maximum daily peak, minimum daily peak, and average daily from the recorded media...".</p> <p>The requirement of reporting the "Minimum Daily Peak" for Total Residual Chlorine (TRC) should be removed. The TRC normally runs at zero on a continuous basis all day long. If there is a single excursion, there is only a single Maximum Daily Peak and no Minimum Daily Peak. If there are multiple excursions, the Maximum Daily Peak should be reported, but it can be difficult to determine the Minimum Daily Peak. There is no common understanding of what that term means, and the value of the information it provides.</p> <p>LASAN requests that the requirement of reporting Minimum Daily Peak be removed.</p>

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Detailed Comment #	Document Reference : (Doc. #, Section #, Page #)	Issue	Comments
25.	Attachment E, Section IV.A, Page E-10	Correct Footnote 28	<p>THM is not in the Basin Plan. Basin Plan only requires inorganic and organic chemicals from the drinking water standards and not disinfection byproduct.</p> <p>LASAN requests to change the footnote 28 to:</p> <p><i>"Total Trihalomethanes is the sum of concentrations of bromodichloromethane, bromoform, chloroform, and dibromochloromethane, and has a Basin Plan limit of 80 ug/L."</i></p>
26.	Attachment E, Section IV.A, Page E-11	Formatting issues Footnote 35	<p>LASAN noticed that the indentations of the footnotes are not consistent throughout the document, including font size.</p> <p>LASAN recommends that the footnotes be formatted consistently.</p>
27.	Attachment E, Section IV.A, Table E-3, Page E-11	Change monitoring frequency	<p>Pentachlorophenol and Benzo(ghi)Perylene has no reasonable potential.</p> <p>LASAN requests to change the monitoring frequency to Semiannual. In addition, LASAN requests that Benzo(ghi)Perylene be removed from Table E-3.</p>
28.	Attachment E, Section IV.A, Table E-3, Page E-12	Consistency of footnote numbering and description. References 36, 37, 6, 38. Footnotes 36, 37, and 38.	<ol style="list-style-type: none"> LASAN noticed that the placement and description of footnotes are not consistent throughout the document. Sometimes the footnote description is placed in the same page while other times the description is referred back to the previous pages. LASAN prefers and recommends that the description of the footnotes be placed on the same page and so as not refer back to the previous pages. The reference footnote 6 is not correct. As recommended above, the "Remaining USEPA priority pollutants" should have a new footnote and description placed on the same page.
29.	Attachment E, Section IV.A, Page E-12	Correct Footnote 37	<p>Footnote 37 is for PCBs as congeners. For clarity, LASAN requests to change "PCBs means the sum..." to "PCBs <i>as congeners</i> mean the sum..."</p>
30.	Attachment E, Section V.A.7, Paragraph 3, Page E-16	Ceriodaphnia test	<p>The number of days to implement the Ceriodaphnia test needs to be 7 as this is how long it takes to prepare the broodboard.</p> <p>LASAN requests to change 48 hours to seven calendar days.</p> <p>Once the Permittee becomes aware of this result, the Permittee shall implement an accelerated monitoring schedule within seven days for the Ceriodaphnia dubia test, and within 5 calendar days for both the Pimephales promelas and Selenastrum capricornutum tests.</p>

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Detailed Comment #	Document Reference : (Doc. #, Section #, Page #)	Issue	Comments
31.	Attachment E, Section VIII.A.1, Table E-5, Page E19	Flow units consistency	LASAN requests that the receiving water flow unit be consistent in the document. LASAN prefers cfs.
32.	Attachment E, Section VIII.A.1, Table E-5, Page E19	THM monitoring frequency	THM effluent monitoring frequency is semiannually. LASAN requests that THM receiving water monitoring frequency also be semi-annually.
33.	Attachment E, Section VIII.A.1, Table E-5, Page E19	Monitoring frequency of Total kjeldahl nitrogen and Total nitrogen	The monitoring frequencies of Total kjeldahl nitrogen, Organic nitrogen, and Total nitrogen frequency be the same. Organic nitrogen is part of Total kjeldahl nitrogen and Total nitrogen LASAN request to change the monitoring frequencies of Total Kjeldahl nitrogen and Total nitrogen to monthly since Organic nitrogen's frequency is monthly.
34.	Attachment E, Section VIII.A.1, Table E-5, Page E-20	Mercury monitoring frequency	Mercury has no reasonable potential. LASAN requests to change monitoring frequency from monthly to quarterly.
35.	Attachment E, Section VIII.A.1, Page E-20	Correct footnote 43, mercury testing	Table E-5 is for monitoring frequency for receiving water samples and not effluent. LASAN requests to correct the footnote 43 to: <i>"The mercury effluent samples shall be analyzed..."</i>
36.	Attachment E, Section VIII.A.1, Table E-5, Page E-21	Consistency of footnotes and description. Footnotes 22, 23, 24.	<ol style="list-style-type: none"> 1. LASAN noticed that the placement and description of footnotes are not consistent throughout the document. Sometimes the footnote description is placed in the same page while other times the description is referred back to the previous pages. LASAN prefers and recommends that the description of the footnotes be placed on the same page and so as not refer back to the previous pages. 2. LASAN requests to correct the footnotes for pesticides, PCB, and "Remaining USEPA priority pollutants". 3. If both PCBs as Arochlors and PCBs as Congeners are required to be monitored, LASAN requests to separate the row for each, along with separate footnotes and PCBs as Arochlors be reported in units of ug/L, while PCBs as Congeners by EPA 1668C be reported in units of pg/L.

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Detailed Comment #	Document Reference : (Doc. #, Section #, Page #)	Issue	Comments
37.	Attachment E, Section VIII.A.2, Table E-6, Page E-22.	Missing footnotes on Mercury, Pesticide, PCBs and "Remaining USEPA priority pollutants".	<p>1. There are no footnotes for Mercury, Pesticide, PCBs and "Remaining USEPA priority pollutants".</p> <p>LASAN requests to add footnotes for Mercury, Pesticide, PCBs and "Remaining USEPA priority pollutants".</p> <p>2. If both PCBs as Arochlors and PCBs as Congeners are required to be monitored, LASAN requests to separate the row for each, along with separate footnotes and PCBs as Arochlors be reported in units of ug/L, while PCBs as Congeners by EPA 1668C be reported in units of pg/L.</p>
38.	Attachment E, Section VIII.A.3, Table E-7, Page E-23.	Remove Chloride and TDS	<p>LASAN requests that TDS and Chloride be removed. The monitoring requirements for the lakes are based on the Department Recreation and Parks' management plans, which were developed in 1991. The requirements were developed for the purpose of protecting aquatic wildlife, human health (i.e., water contact), and providing information for lake management. It was decided by the team that developed the management plan that TDS and chloride did not need to be monitored since they provided no information that would help in lake management or in assessing protection of wildlife and human health. In addition, conductivity, which is directly related to TDS, is already tested monthly at Lake Balboa. TDS and chloride are also already tested for in the effluent and at 6 stations in the LA River and its tributaries. TDS and chloride should be removed from the lakes monitoring requirements since they are redundant and provide no useful information for wildlife and health protection or lake management issues.</p>
39.	Attachment E, Section VIII.C.1, Table E-9, Page E-25.	Sediment monitoring location	<p>In this tentative permit, the sediment monitoring locations are RSW-4 and RSW-W2, but RSW622 is missing. According to an administrative letter dated February 13, 2012, the Regional Water Board approved LASAN's request to include RSW 622.</p> <p>LASAN would like confirmation if RSW 622 was intentionally removed.</p>
40.	Attachment E, Section VIII.C.1, Table E-9, Page E-25	Missing footnotes for Pesticide, PCBs and "Remaining USEPA priority pollutants".	<p>1. There are no footnotes for Pesticide, PCBs and "Remaining USEPA priority pollutants".</p> <p>LASAN requests to define and add footnotes for Pesticide, PCBs and "Remaining USEPA priority pollutants".</p> <p>2. If PCBs means PCBs as Arochlors, please specify. If both PCBs as Arochlors and PCBs as Congeners are required to be monitored, LASAN requests to separate the row for each, along with separate footnotes.</p>

LASAN Comments on the 2017 DCTWRP Tentative NPDES Permit

Detailed Comment #	Document Reference : (Doc. #, Section #, Page #)	Issue	Comments
41.	Attachment E, Section VIII.E, Page E-26.	Specify monitoring Location Name	<p>LASAN recommends specifying the Monitoring Location Name RSW-003D as defined on Page E-6.</p> <p>LASAN requests to correct the coordinates for the LA River Wardlow Station Stream flow gage to Latitude (North) 33.81598, Longitude (West) -118.20552.</p>
42.	Attachment E, Section IX.A, Page E-27	Typo error	LASAN requests to correct the paragraph heading to: <i>"Los Angeles River Watershed Monitoring Program (LARWMP)"</i>
43.	Attachment F, Section II.A.1, Paragraph 1, Page F-4	Correct flow language	<p>The tentative permit states that, <i>"In 2015, the average treated tertiary-treated municipal wastewater was approximately 46.1 MGD"</i>. The 2015 DCTWRP effluent discharge (tertiary-treated wastewater) averaged 35 MGD while the average influent flow to DCTWRP in 2015 averaged 46.1 MGD.</p> <p>LASAN requests the following corrections:</p> <p><i>"In 2015, the average daily influent flow treated tertiary-treated municipal wastewater was approximately 46.1 MGD"</i>.</p>
44.	Attachment F, Section II.B.1.a, Page F-6	Incorrect language	<p>LASAN requests to change: <i>"Discharge to Los Angeles River via Wildlife Lake, Lake Balboa,..."</i> to:</p> <p><i>"Discharge to Los Angeles River, directly and via Wildlife Lake, Lake Balboa..."</i></p>
45.	Attachment F, Section II.C.1, Table F-2, Page F-9	Mercury daily limit	In Table F-2, the mercury daily maximum limit in the 2011 permit is wrong. LASAN requests to change to 0.15 ug/l from 0.051 ug/l.
46.	Attachment F, Section IV.C.4.b.i, Page F-9, Paragraph 1	WLA for copper	LASAN requests to correct WLA for copper to 26 ug/l from 103 ug/l.

LASAN Comments on the 2017 DCTWRP Tentative NPDES Permit

Detailed Comment #	Document Reference : (Doc. #, Section #, Page #)	Issue	Comments
47.	Attachment F, Section IV.D.1.b, Page F-64	Reopener clause	<p>The permit characterizes the ammonia and copper limits as water quality based effluent limits (WQBELs) even though these limits are not based on water quality objectives and are solely based on performance. Thus, these are more appropriately characterized as performance based effluent limits (PBELs).</p> <p>Although the City may be able to meet the proposed PBELs currently, the concern is that this will not be true in the future. While the City appreciates the addition of a reopener, this reopener will not protect the City from MMPs should a PBEL be exceeded for reasons beyond its control. Further, the City wants to make sure that there are no future backsliding issues related to these performance-based limits should performance differ in the future.</p> <p>To address these concerns, the City requests the following minor changes be made to the reopener provisions of the permit and fact sheet.</p> <p><i>"In addition, this Order includes a reopener that allows for modification of the NPDES Order to recalculate the WQBEL limits for ammonia as nitrogen and/or copper, to incorporate a revised margin of safety factor reflective of plant performance consistent with <u>and up to the maximum limits allowed by</u> the applicable TMDLs, if <u>the discharger provides new information to the Regional Board that shows</u> flow conditions or other extenuating circumstances cause a significant change in the water reclamation plant's treatment performance."</i></p>
48.	Attachment F, Section VII.B, Table F-13, Page F-73, F-74	Column header, Acute toxicity	<p>LASAN requests to change header name in column 3 from 2016 to 2017.</p> <p>Acute toxicity monitoring is no longer required. LASAN requests to change monitoring frequency to "not required".</p>
49.	Attachment F, Section VII.B, Table F-13, Page F-73	Frequency does not match that listed in Effluent Monitoring Table E-3	<p>Sulfate, Nitrate-N, Nitrite-N, Organic-N, and Total Nitrogen are listed as changing from monthly to quarterly. However, in the Effluent Monitoring Table in Attachment E, Table E-3, pages E-9 and E-10, the frequencies of these compounds are listed as monthly.</p> <p>LASAN requests that Table F-13 be corrected to match Table E-3.</p>

LASAN Comments on the 2017 DCTWRP Tentative NPDES Permit

Detailed Comment #	Document Reference : (Doc. #, Section #, Page #)	Issue	Comments
50.	Attachment F, Section VII.B, Table F-13, Page F-73	Fecal Coliform and E. Coli	<p>In Table F-13, fecal coliform is listed as “daily” under the 2011 Permit column and no “change” under the 2017 Permit column for the monitoring frequency. Fecal coliform has been removed from the tentative permit.</p> <p>E Coli is listed as “weekly” under the 2011 Permit column and “no change” under the 2017 Permit column for the monitoring frequency. E Coli is now required to be tested daily from the tentative permit.</p> <p>LASAN requests that monitoring frequency for fecal coliforms be changed to “not required” and E coli to “daily” under the “2017 Permit” column in Table F-13.</p>
51.	Attachment H, Section B.1, Page H-3	Local Limit evaluation report	<p>The City’s Hyperion Treatment System (HTS) is a joint outfall system consisting of the wastewater collection system and four treatment plants (HTP, DCTWRP, LAGWRP, and BWRP). Because of the interconnection of the treatment plants, LASAN conducts the local limit evaluation on the entire Hyperion Service Area. This tentative permit requires LASAN to provide written technical evaluation of the need to revise local limits within 180 days of the issuance of DCTWRP NPDES permit.</p> <p>LASAN requests that the submission of local limit evaluation report be synchronized among the DCTWRP, LAGWRP, and HTP. As result, LASAN requests the following change:</p> <p><i>“In accordance with 40 CFR § 122.44(j) (2) (ii), the POTW shall provide a written technical evaluation of the need to revise local limits under 40 CFR § 403.5(c) (1) within 180 days of issuance or reissuance of the Tillman Water Quality Control Hyperion Treatment Plant (TILLMAN-WRP) NPDES permit.</i></p> <p>The above language is the same as written in the 2017 LAGWRP Tentative Permit.</p>