



Los Angeles Regional Water Quality Control Board

April 27, 2015

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

Dear Ms. Salinas:

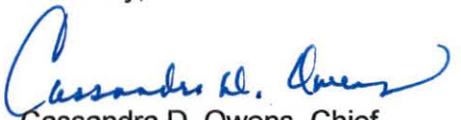
REVISED TENTATIVE WASTE DISCHARGE REQUIREMENTS AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT, AND RESPONSE TO COMMENTS FOR TFX AVIATION, INC., TFX AVIATION, INC. FACILITY, NEWBURY PARK CA. (NPDES NO. CA0064599, CI NO. 9544)

Our letter dated March 25, 2015, transmitted the tentative Waste Discharge Requirements (WDRs) to TFX Aviation, Inc. for the discharge of treated groundwater from the TFX Aviation, Inc. Facility to the South Fork of Arroyo Conejo Creek, a water of the United States. We received your comments on April 15, 2015, via email, regarding the tentative WDRs. Regional Water Board staff evaluated the comments and, as appropriate, have incorporated them in the revised tentative WDRs. Enclosed please find the Response to Comments, and revised pages of the tentative WDRs.

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. K. Erik Friess, Esq. Allen Matkins
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)**

RESPONSE TO COMMENTS

**RESPONSE TO COMMENTS ON THE TENTATIVE NPDES PERMIT
TFX AVIATION, INC.
TFX AVIATION, INC., FACILITY
NPDES PERMIT NO. CA0064599**

Commenter / Letter Date	No.	Comment	Response	Action Taken
<p>TFX Aviation Inc. (Discharger or TFX) / 4-15-2015</p>	<p>1.</p>	<p>On page 16 please remove the sixth paragraph which is labeled "ii." This paragraph states that quarterly monitoring for influent shall be conducted, however pages E-5 (numeral III) and F-46 (numeral VII A) state that influent monitoring is not applicable. We concur that influent monitoring is not applicable for the reportable priority pollutants. The list contains numerous constituents that would not be expected to be found in the groundwater we are treating. To ensure permit consistently we recommend this paragraph be removed. In addition, as shown on Table 1 influent monitoring has taken place since 1999 and sufficient data is already available regarding the character of our influent water.</p>	<p>The referenced paragraph labelled "... " is in Section VI.C.3.b. Pollutant Minimization Program. The Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (SIP) in Section 2.4.5. Compliance Determination, Item 2, states that "Dischargers shall be required to conduct a Pollutant Minimization Program"... "where there is evidence (e.g., sample results reported as Detected, but Not Quantified (DNQ) when the effluent limitation is less than the Method Detection Limit (MDL), sample results from analytical methods more sensitive than those methods included in the permit"... presence of whole effluent toxicity, health advisory for fish consumption, results of benthic or aquatic organism tissue sampling) that the priority pollutant is present in the effluent above an effluent limitation and either:</p> <ul style="list-style-type: none"> (1) A sample is reported as DNQ and the effluent limit is less than the Reporting Limit (RL); or (2) A sample result is reported as Non-Detect (ND) and the effluent limitation is less than the MDL. 	<p>The Order and Fact Sheet have been revised</p>

Response To Comments
TFX Aviation, Inc.

Commenter / Letter Date	No.	Comment	Response	Action Taken
			Staff reviewed the monitoring data for priority pollutants during the term of the existing permit. The data indicates that there were no sample results reported as DNQ and the MDL were less than the effluent limitations and the State Water Board Minimum Levels (MLs). Thus, the Pollution Minimization Program requirement on pages 15 and 16 of the Order is not required has been deleted.	
TFX / 4-15-2015	2.	On page 20 the last sentence of the last paragraph please change "during the calendar month" to "within 30 days of identifying the failure." This is necessary because of the time that it takes to obtain chronic toxicity data after a sample is taken. If the toxicity data result of a failure is received on the 30th of the month, it could not be possible to obtain three independent toxicity tests within the same calendar month because the month would have already ended.	There are instances, when the Discharger may not be able to complete the toxicity testing required in the same calendar month. The last sentence on page 20 of the Order has been revised to read " <u>During a calendar month 30-day monitoring period which begins immediately after being notified of the test results</u> , exactly three independent toxicity tests are required when one toxicity test results in "Fail"	The Order, and Monitoring and Reporting Program (MRP) (Item 7.b., page E-10) have been revised.
TFX / 4-15-2015	3.	On page C-1 please note on Figure 4 that flow schematic shows the microfiltration treatment unit which is scheduled for removal in the near future. Attached is a revised Figure 4 which indicates that the microfiltration unit is optional.	The Figure 4 has been replaced with the new Figure 4 provided by TFX.	Figure 4 has been replaced.
TFX / 4-15-2015	4.	Effluent monitoring Table E-2: Please remove the following constituents from the monitoring requirements: antimony, beryllium, chromium III, thallium, zinc, 1,4 dioxane and TCDD equivalents. Rationale for this request is detailed in Attachment	The monitoring data for beryllium, and thallium indicated non-detected (ND). The monitoring data indicated antimony, chromium III, and zinc were detected but below the California Toxics Rule (CTR) criteria. Therefore, the	The MRP has been revised.

Response To Comments
 TFX Aviation, Inc.

Committer / Letter Date	No.	Comment	Response	Action Taken
		<p>1. As shown in Attachment 1 these constituents are not associated with the facility, no manufacturing activities have taken place on this property for more than 25 years, many of these constituents have been sampled at the site for over 10 years, and there is sufficient data showing that they are not present or, for naturally occurring metals, are at concentrations typical in background samples.</p>	<p>quarterly monitoring requirements for antimony, beryllium, chromium III, thallium, and zinc, have been removed in the MRP. However, these pollutants are included in the priority pollutants that are monitored once per year. The monitoring data indicated that 1,4-dioxane was detected but below the California State Action Level for Drinking Water. In addition, there is no CTR criteria for 1,4-dioxane. Therefore, the monitoring requirement for 1,4-dioxane has been modified to annually.</p> <p><u>For TCDD Equivalents:</u></p> <p>The CTR indicates that "For National Pollutant Discharge Elimination System (NPDES) purposes, EPA supports the regulation of other dioxin and dioxin-like compounds through the use of toxicity equivalents (TEQs) in NPDES permits... For California waters, if the discharge of dioxin or dioxin-like compounds has reasonable potential to cause or contribute to a violation of a narrative criterion, numeric water quality-based effluent limitations for dioxin or dioxin-like compounds should be included in NPDES permits and should be expressed using a TEQ scheme."</p> <p>The World Health Organization developed toxicity equivalency factors (TEFs) to convert</p>	<p>None required.</p>

Response To Comments
TFX Aviation, Inc.

Commenter / Letter Date	No.	Comment	Response	Action Taken
			<p>congener concentrations into equivalent concentrations of 2,3,7,8-tetrachlorinated dibenzo-p-dioxin (2,3,7,8-TCDD), which when added together are expressed as dioxin-TEQ. The <i>Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California</i> (State Implementation Policy, SIP) specifies that the World Health Organization's 1998 TEFs are to be used to calculate dioxin-TEQ.</p> <p>To determine if the discharge of dioxin or dioxin-like compounds from the Facility has reasonable potential to cause or contribute to a violation of the Basin Plan's narrative water quality objective regarding bioaccumulation, Regional Water Board staff has therefore used TEFs to express the measured concentrations of 16 dioxin congeners in effluent and background samples as 2,3,7,8-TCDD. These "equivalent" concentrations are then compared to the numeric criterion, established by the CTR for 2,3,7,8-TCDD of 1.4×10^{-8} µg/L. Dioxin-TEQ values reflect the combined effect of numerous dioxin and furan compounds (congeners).</p> <p>The monitoring data indicates that TFX analyzed for 2,3,7,8-TCDD in January 2010 and July 2011 for the effluent and no TCDD analysis for receiving water.</p>	

Response To Comments
TFX Aviation, Inc.

Commenter / Letter Date	No.	Comment	Response	Action Taken
			Therefore, the proposed permit requires TFX to monitor TCDD Equivalents (once per year) in the effluent and receiving water to determine reasonable potential.	
TFX / 4-15-2015	5.	On pages E-9 and E-10 please eliminate the first paragraph under number 6 Species sensitivity screening. TFX has identified <i>Ceriodaphnia dubia</i> as the most sensitive species based on five sensitivity tests conducted since 2009 as presented on Table 2. Rescreening every three years is acceptable as described in the second paragraph of number 6 at the top of page E-10.	The sensitivity of the species may vary. According to the United States Environmental Protection Agency (USEPA) Technical Support Document For Water Quality-Based Toxics Control (TSD), March 1991, page 16, Species Sensitivity Differences, it states that "Different species exhibit different sensitivities to toxicant." Further, the TSD states that "...EPA recommends a minimum number of three species, representing three different phyla (e.g., a fish, an invertebrate, and a plant) be used to test an effluent for toxicity." On page 58 of the TSD states that "... For one organism to consistently be the most sensitive in a battery of toxicity test, two conditions must occur: (1) the toxicants causing toxicity must remain the same, and (2) the ratios of the toxicants in the effluent (if more than one) must remain the same. Based on EPA's experience at the Duluth research laboratory, neither of these conditions is likely to occur." Therefore, TFX is required to use the three species mentioned in number 6, pages E-9 and E-10 of the MRP for the species sensitivity screening. The most sensitive species shall be used for monitoring.	None required.

Response To Comments
TFX Aviation, Inc.

Commenter / Letter Date	No.	Comment	Response	Action Taken
			<p>Since TFX has been involved in toxicity monitoring throughout the tenure of Order No. R4-2009-0096 and R4-2009-0096-A01, the facility will upon the effective date of the permit initiate rescreening as described in paragraph 2 in Section V.A.6, page E-10 of the tentative Monitoring and Reporting Program.</p>	
<p>TFX / 4-15-2015</p>	<p>6.</p>	<p>Please remove TCDD equivalents from Table E-3 on page E-13. TFX should not be responsible for characterizing TCDD levels in waters upstream of their discharge. Also, TCDD is not even a constituent that would be expected from historic processes as discussed in Attachment 1.</p>	<p>See Response to Comment No. 4 for TCDD.</p>	<p>None required.</p>
<p>TFX / 4-15-2015</p>	<p>7.</p>	<p>On page F-5 first sentence please remove the following text "that accumulate in microfiltration modules." As noted in point 3, the microfiltration treatment unit is scheduled for removal in the near future.</p>	<p>Staff concurs. The first sentence on page F-5 of the Fact Sheet that reads "The treatment system has four additional bag filters for processing solids that accumulate in microfiltration modules" was revised to delete the text.</p>	<p>The Fact Sheet has been revised.</p>
<p>TFX / 4-15-2015</p>	<p>8.</p>	<p>On page F-5 please make the following correction to the sentence that says "The new location of the discharge point No. 0001 ... is located within <u>at the drop inlet</u> to the newly constructed lined drainage channel</p>	<p>Staff concurs. The statement on page F-5 of the Fact Sheet has been revised to read "The treated groundwater is discharged through Discharge Point No. 001 located <u>within</u> <u>at the drop inlet</u> to the newly constructed concrete lined drainage channel..."</p>	<p>The Fact Sheet has been revised.</p>

Response To Comments
TFX Aviation, Inc.

Commenter / Letter Date	No.	Comment	Response	Action Taken
TFX / 4-15-2015	9.	On page F-10 under section E Planned Changes please state TFX has indicated that they plan to modify the treatment system to eliminate microfiltration within about a year. This is because influent concentrations of chromium in groundwater have decreased to levels that no longer require certain treatment and microfiltration of treated groundwater is no longer warranted.	Staff concurs. Section E., page F-10 of the Fact Sheet has been revised to include the statements "TFX indicated that they plan to modify the treatment system to eliminate microfiltration within about a year. This modification is planned because the influent concentrations of chromium in groundwater have decreased to levels that no longer require certain treatment and microfiltration of treated groundwater is no longer warranted."	The Fact Sheet has been revised.

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

**REVISED TENTATIVE
WASTE DISCHARGE REQUIREMENTS
(Pages 15, 16, and 20)**

3. Best Management Practices and Pollution Prevention

- a. The Discharger shall submit within **90 days** of the effective date of this Order:
- i. An updated Storm Water Pollution Prevention Plan (SWPPP) that describes site-specific management practices for minimizing contamination of storm water runoff and for preventing contaminated storm water runoff from being discharged directly to waters of the State. The SWPPP shall be developed in accordance with the requirements in Attachment G.
 - ii. An updated Best Management Practices Plan (BMPP) that entails site-specific plans and procedures implemented and/or to be implemented to prevent hazardous waste/material from being discharged to waters of the State. The BMPPs shall be consistent with the general guidance contained in the U.S. EPA *Guidance Manual for Developing Best Management Practices* (BMPs) (EPA 833-B-93-004). In particular, a risk assessment of each area identified by the Discharger shall be performed to determine the potential for hazardous or toxic waste/material discharge to surface waters.
 - iii. A Spill Contingency Plan (SCP) that shall include a technical report on the preventive (failsafe) and contingency (cleanup) plans for controlling accidental discharges, and for minimizing the effect of such events at the site. The SCP requirement may be satisfied with an updated version of the Discharger's existing Spill Prevention Control and Countermeasure Plan.

Each plan shall cover all areas of the Facility and shall include an updated drainage map for the Facility. The Discharger shall identify on a map of appropriate scale the areas that contribute runoff to the permitted discharge point; describe the activities in each area and the potential for contamination of storm water runoff and the discharge of hazardous waste/material; and address the feasibility of containment and/or treatment of storm water. The plans shall be reviewed annually and at the same time. Updated information shall be submitted **within 30 days** of revision.

The Discharger shall implement the SWPPP, BMPP, and SCP (or SPCC) within **10 days** of the approval by the Executive Officer or **no later than 90 days** after submission to the Regional Water Board, whichever comes first.

~~b. Pollutant Minimization Program~~

~~The Discharger shall develop and conduct a Pollutant Minimization Program (PMP) to maintain effluent concentrations of priority pollutants (see Attachment H) as further described below when there is evidence (e.g., sample results reported as DNQ when the effluent limitation is less than the MDL, sample results from analytical methods more sensitive than those methods required by this Order, presence of whole effluent toxicity, health advisories for fish consumption, results of benthic or aquatic organism tissue~~

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sampling) that a priority pollutant is present in the effluent above an effluent limitation and either:

- ~~i. A sample result is reported as DNQ and the effluent limitation is less than the reporting level (RL); or~~
- ~~ii. A sample result is reported as ND and the effluent limitation is less than the MDL, using definitions described in Attachment A and reporting protocols described in the MRP section X.B.4.~~

~~The PMP shall include, but not be limited to, the following actions and submittals acceptable to the Regional Water Board:~~

- ~~i. An annual review and semi-annual monitoring of potential sources of the reportable priority pollutant(s), which may include fish tissue monitoring and other bio-uptake sampling;~~
- ~~ii. Quarterly monitoring for the reportable priority pollutant(s) in the influent to the wastewater treatment system;~~
- ~~iii. Submittal of a control strategy designed to proceed toward the goal of maintaining concentrations of the reportable priority pollutant(s) in the effluent at or below the effluent limitation;~~
- ~~iv. Implementation of appropriate cost-effective control measures for the reportable priority pollutant(s), consistent with the control strategy; and~~
- ~~v. An annual status report shall be sent to the Regional Water Board at the same time the annual self-monitoring report (SMRs) is submitted in accordance with section X.B of the MRP (Attachment E) and include:
 - ~~(a) All PMP monitoring results for the previous year;~~
 - ~~(b) A list of potential sources of the reportable priority pollutant(s);~~
 - ~~(c) A summary of all actions undertaken pursuant to the control strategy; and~~
 - ~~(d)(a) — A description of actions to be taken in the following year..~~~~

4. Construction, Operation and Maintenance Specifications

The Discharger shall at all times properly operate and maintain all facilities and systems installed or used to achieve compliance with this order.

5. Special Provisions for Municipal Facilities (POTWs Only) – Not Applicable

6. Other Special Provisions – Not Applicable

7. Compliance Schedules – Not Applicable

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relative "Percent (%) Effect" at the discharge IWC is defined and reported as: $((\text{Mean control response} - \text{Mean discharge IWC response}) \div \text{Mean control response}) \times 100$.

The Maximum Daily Effluent Limitation (MDEL) for chronic toxicity is exceeded and a violation will be flagged when a chronic toxicity test, analyzed using the TST approach, results in "Fail" and the "Percent (%) Effect" is ≥ 0.50 .

The Median Monthly Effluent Limitation (MMEL) for chronic toxicity is exceeded and a violation will be flagged when the median of no more than three independent chronic toxicity tests conducted within the same calendar month and analyzed using the TST approach, results in "Fail". During a ~~calendar month~~ 30-day monitoring period which begins immediately after being notified of the test results, exactly three independent toxicity tests are required when one toxicity test results in "Fail".

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

**REVISED TENTATIVE
MONITORING AND REPORTING PROGRAM
(Pages E-6, E-7, and E-10)**

Table E-2. Effluent Monitoring

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Flow	MGD	Recorder	1/Day ¹	--
Conventional Pollutants				
Biochemical Oxygen Demand 5-day@20°C (BOD ₅) ²	mg/L	Grab	1/Quarter	3
Total Suspended Solids (TSS) ²	mg/L	Grab	1/Quarter	3
pH	standard units	Grab	1/Month	3
Oil and Grease ²	mg/L	Grab	1/Quarter	3
Non-Conventional Pollutants				
Temperature	°F	Grab	1/Month	3
Chemical Oxygen Demand (COD)	mg/L	Grab	1/Month	3
Settleable Solids	ml/L	Grab	1/Quarter	3
Turbidity	NTU	Grab	1/Quarter	3
Total Dissolved Solids ²	mg/L	Grab	1/Quarter	3
Sulfate ²	mg/L	Grab	1/Quarter	3
Chloride ²	mg/L	Grab	1/Quarter	3
Boron ²	mg/L	Grab	1/Quarter	3
Nitrate + Nitrite (as N) ²	mg/L	Grab	1/Quarter	3
Sulfides ²	mg/L	Grab	1/Quarter	3
Ammonia	mg/L	Grab	1/Quarter	3
Phenolic Compounds (Chlorinated) ^{2,4}	µg/L	Grab	1/Quarter	3
Methyl Tertiary Butyl Ether (MTBE) ²	µg/L	Grab	1/Quarter	3
Tertiary Butyl Alcohol (TBA)	µg/L	Grab	1/Quarter	3
Chlorpyrifos ²	µg/L	Grab	1/Quarter	3
Diazinon ²	µg/L	Grab	1/Quarter	3
Phenols ^{2,5}	mg/L	Grab	1/Year	3
Methyl Ethyl Ketone (MEK) ²	µg/L	Grab	1/Year	3
Chronic Toxicity ⁶	Pass or Fail and % Effect for TST approach	Grab	1/ Year ⁷	3, 6
Priority Pollutants				
Antimony, Total Recoverable ²	µg/L	Grab	1/Quarter	3
Arsenic, Total Recoverable ²	µg/L	Grab	1/Quarter	3
Beryllium, Total Recoverable ²	µg/L	Grab	1/Quarter	3
Cadmium, Total Recoverable ²	µg/L	Grab	1/Quarter	3
Chromium III, Total Recoverable ²	µg/L	Grab	1/Quarter	3

REVISED TENTATIVE

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Chromium VI ²	µg/L	Grab	1/Month	3
Copper, Total Recoverable ²	µg/L	Grab	1/Quarter	3
Lead, Total Recoverable ²	µg/L	Grab	1/Quarter	3
Mercury, Total Recoverable ²	µg/L	Grab	1/Month	3
Nickel, Total Recoverable ²	µg/L	Grab	1/Quarter	3
Selenium, Total Recoverable ²	µg/L	Grab	1/Quarter	3
Silver, Total Recoverable ²	µg/L	Grab	1/Quarter	3
Thallium, Total Recoverable ²	µg/L	Grab	1/Quarter	3
Zinc, Total Recoverable ²	µg/L	Grab	1/Quarter	3
Benzene ²	µg/L	Grab	1/Quarter	3
Toluene ²	µg/L	Grab	1/Quarter	3
Xylene ²	µg/L	Grab	1/Quarter	3
Ethylbenzene ²	µg/L	Grab	1/Quarter	3
Dichlorobromomethane ²	µg/L	Grab	1/Quarter	3
Carbon Tetrachloride ²	µg/L	Grab	1/Quarter	3
1,1-Dichloroethane ²	µg/L	Grab	1/Quarter	3
1,2-Dichloroethane ²	µg/L	Grab	1/Quarter	3
1,1-Dichloroethylene ²	µg/L	Grab	1/Quarter	3
Trans1,2-Dichloroethylene ²	µg/L	Grab	1/Quarter	3
Tetrachloroethylene ²	µg/L	Grab	1/Quarter	3
1,1,1-Trichloroethane ²	µg/L	Grab	1/Quarter	3
Trichloroethylene ²	µg/L	Grab	1/Month	3
Vinyl Chloride ²	µg/L	Grab	1/Quarter	3
Chlordane ²	µg/L	Grab	1/Quarter	3
4,4-DDD ²	µg/L	Grab	1/Quarter	3
4,4-DDE ²	µg/L	Grab	1/Quarter	3
4,4-DDT ²	µg/L	Grab	1/Quarter	3
Dieldren ²	µg/L	Grab	1/Quarter	3
Polychlorinated Biphenyls (PCBs) ^{2,8}	µg/L	Grab	1/Quarter	3
Toxaphene ²	µg/L	Grab	1/Quarter	3
Remaining Priority Pollutants ⁹	µg/L	Grab	1/Year	3
1,4-Dioxane ²	µg/L	Grab	1/Month 1/Year	3
TCDD Equivalent ¹⁰	µg/L	Grab	1/Year	3

REVISED TENTATIVE

¹ Flow shall be recorded daily during each period of discharge. Periods of no flow shall also be reported.

² The mass emission (lbs/day) for the discharge shall be calculated and reported using the measured concentration and the actual flow rate measured at the time of discharge, using the formula:

$$M = 8.34 \times C_e \times Q$$

where: M = mass discharge for a pollutant, lbs/day.

C_e = Measured concentration for a pollutant, mg/L.

species previously referenced. The species that exhibits the highest “Percent (%) Effect” at the discharge IWC during species sensitivity screening shall be used for routine annual monitoring.

Rescreening is required every three years. The Discharger shall rescreen with the three species listed above and continue to monitor with the most sensitive species. If the first suite of rescreening tests demonstrates that the same species is the most sensitive, then the rescreening does not need to include more than one suite of tests. If a different species is the most sensitive, or if there is ambiguity, then the Discharger shall proceed with suites of screening tests for a minimum of three, but not to exceed five suites.

7. Quality Assurance and Additional Requirements

Quality assurance measures, instructions, and other recommendations and requirements are found in the test methods manual previously referenced. Additional requirements are specified below.

- a. The discharge is subject to determination of “Pass” or “Fail” and “Percent Effect” from a single-effluent concentration chronic toxicity test at the discharge IWC using the Test of Significant Toxicity (TST) approach described in *National Pollutant Discharge Elimination System Test of Significant Toxicity Implementation Document* (EPA 833-R-10-003, 2010), Appendix A, Figure A-1, and Table A-1. The null hypothesis (Ho) for the TST approach is: Mean discharge IWC response $\leq 0.75 \times$ Mean control response. A test result that rejects this null hypothesis is reported as “Pass”. A test result that does not reject this null hypothesis is reported as “Fail”. The relative “Percent (%) Effect” at the discharge IWC is defined and reported as: $((\text{Mean control response} - \text{Mean discharge IWC response}) \div \text{Mean control response}) \times 100$.
- b. The Median Monthly Effluent Limit (MMEL) for chronic toxicity only applies when there is a discharge more than one day in a calendar month period. This discharge occurs more than one day in a calendar month; consequently, during a calendar month 30-day monitoring period which begins immediately after being notified of the test results, up to three independent toxicity tests are required for routine monitoring when one toxicity test results in “Fail”.
- c. If the effluent toxicity test does not meet all test acceptability criteria (TAC) specified in the referenced test method, then the Discharger must re-sample and re-test within 14 days.
- d. Dilution water and control water, including brine controls, shall be laboratory water prepared and used as specified in the test methods manual. If dilution water and control water is different from test organism culture water, then a second control using culture water shall also be used.
- e. Reference toxicant tests and effluent toxicity tests shall be conducted using the same test conditions (e.g., same test duration, etc.). Monthly reference toxicant testing is sufficient.
- f. All reference toxicant test results should be reviewed and reported according to EPA guidance on the evaluation of concentration-response relationships found

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

**REVISED TENTATIVE FACT SHEET
(Pages F-5, F-10, F-39, and F-47)**

The treatment system has four additional bag filters for processing solids, ~~that accumulate in the microfiltration modules.~~ Solids removed by the Facility's bag filters are stored in drums and hauled off-site for proper disposal.

B. Discharge Points and Receiving Waters

The treated groundwater is discharged through Discharge Point No. 001 located within at the drop inlet to the newly constructed concrete lined drainage channel which runs adjacent to the southbound lanes of the 101 Freeway between the Wendy Road and Borchard Road Exits and into the South Fork of Arroyo Conejo, a water of the United States. The Discharge Point No. 001 is located at Latitude 34.1896° North, Longitude -118.9399° West.

Previously, the treated groundwater was discharged through the former Discharge Point No. 001 (Latitude 34.18941° North, Longitude -118.93697° West) which is located on the concrete channel that runs on the northbound lanes of the 101 Freeway (approximately 800 feet south east of the intersection of Wendy Road and the off ramp of 101 Freeway), and into the South Fork of Arroyo Conejo Creek, a water of the United States. The discharge was regulated by Order No. R4-2009-0096, adopted by this Regional Water Board on September 3, 2009. Order No. R4-2009-0096 was amended by Order No. R4-2009-0096-A01, adopted on November 6, 2012, to change the location of the Discharge Point No. 001 and the name of the Discharger (from Telair International Inc. to TFX Aviation Inc.). The new location of the Discharge Point No. 001 (Latitude 34.1896° North, Longitude -118.9399° West) is located within the newly constructed lined drainage channel which runs adjacent to the southbound lanes of the 101 Freeway between the Wendy Road and Borchard Road exits and into the South Fork of Arroyo Conejo, a water of the United States.

Attachment B depicts a topographic map of the area around the Facility. Attachment C depicts the schematic diagram of the wastewater flow.

C. Summary of Existing Requirements and Self-Monitoring Report (SMR) Data

Effluent limitations contained in Order No. 2009-0096 as amended by Order No. 2009-0096-A01 for discharges from Discharge Point No. 001 (Monitoring Location 001). Monitoring data reported during the term of the previous permit are as follows:

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Date	Monitoring Period	Violation Type	Pollutant	Reported Value	Permit Limitation	Chronic Toxicity Trigger	Units
4/28/2011	2nd Quarter 2011	Toxicity Trigger	Chronic Toxicity	>1 ¹	--	1	TU _c
5/24/2011	2 nd Quarter 2011	Toxicity Trigger	Chronic Toxicity	>1 ¹	--	1	TU _c
7/6/2010	3 rd Quarter 2010	Toxicity Trigger	Chronic Toxicity	>1 ¹	--	1	TU _c

¹ Chronic bioassay test for Ceriodaphnia Dubia reproduction or survival failed. Acute and chronic toxicity for other species (fathead minnow, algae) passed the reproduction and survival tests.

On December 26, 2013, Settlement Offer No R4-2013-0183, to participate in the Expedited Payment Program in the amount of \$9,000.00 for violations of the requirements contained in Order No. R4-2009-0096 as amended by Order No. R4-2009-0096-A01 for TDS and pH was mailed to TFX Aviation, Inc. The Settlement Offer No. R4-2013-0183 included violations for TDS that occurred during the period of 1st Quarter 2013 and 2nd Quarter 2013 and for pH that occurred during the period of 2nd Quarter 2013. TFX accepted the offer and the Regional Water Board received the payment of \$9,000.00 from TFX on March 13, 2014.

TFX conducted a toxicity identification evaluation (TIE) and toxicity reduction evaluation (TRE) for the chronic toxicity violations that occurred in 2011 to determine the cause of the exceedance. The 2010 annual report indicated that a review of site chemical data led to the hypothesis that 1,4-dioxane was the source of the toxicity. Corrective actions were taken to reduce or eliminate the concentration of 1,4-dioxane in the effluent. The 2011 annual report indicated that a TIE was initiated and tested water samples collected from August 24 to 25, and 30 to 31, 2011, were tested. The results showed that Ceriodaphnia Dubia (daphnia) reproduction passed the toxicity test. No TIE was conducted for the toxicity exceedance in 2012. The 2013 annual report indicated that the result of the sample collected on October 31, 2013, passed the chronic daphnia reproduction test. The 3rd Quarter monitoring report indicated that chronic toxicity bioassay test passed the reproduction and survival test.

The violations of the chromium VI effluent which occurred on March 5, 2014, and chloride effluent limitation which occurred on May 25, 2011, are being evaluated for appropriate enforcement action.

E. Planned Changes

The Discharger has not reported any planned changes. TFX indicated that they plan to modify the treatment system to eliminate microfiltration within about a year. This modification is planned because the influent concentrations of chromium in groundwater have decreased to levels that no longer require certain treatment and microfiltration of treated groundwater is no longer warranted.

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requirements. The chronic toxicity effluent limitation protects the Basin Plan acute toxicity objective, new information indicates it is more sensitive than the acute test, and the test evaluates mortality, changes in growth rate and changes in reproduction.

For cadmium, the effluent limitations in this Order are less stringent. The CTR criteria for freshwater, or for protection of human health ~~protection from including~~ consumption of organisms, whichever is more stringent, are used to prescribe the effluent limitations to protect the beneficial uses of the South Fork of Arroyo Conejo Creek in the vicinity of the discharge. As mentioned previously, the groundwater recharge (GWR) of the underlying Conejo Valley groundwater basin is also a beneficial use for the receiving water body. The GWR beneficial use is protected using the Basin Plan MCLs which are used to protect drinking water ~~and in the Conejo Valley groundwater basin~~ which has a MUN beneficial use. The receiving water, South Fork of Arroyo Conejo Creek, has associated with it an MUN-designation (potential) as well as groundwater recharge beneficial uses. Therefore, the Basin Plan MCL was used as criteria for protection of human health ~~protection from consumption of organism~~.

In the previous Order, the effluent limitations for cadmium and other metals were calculated ~~as well as the reasonable potential were evaluated~~ based on the CTR criteria for freshwater using a hardness value of 100 mg/L because there was no available hardness data for the South Fork of Arroyo Conejo, ~~as part of TFX's required CTR monitoring~~. Monitoring data collected for hardness during the period from 2010 through 2014 ranges from 400 mg/L to 520 mg/L for the South Fork of Arroyo Conejo. This is new information. According to the CTR, for determining freshwater aquatic life criteria for metals, the actual ambient hardness of the surface water shall be used for surface waters with a hardness of 400 mg/L or less as calcium carbonate. For surface waters with a hardness of over 400 mg/L as calcium carbonated, a hardness of 400 mg/L shall be used. Thus, this Order utilized a hardness of 400 mg/L to evaluate the reasonable potential and calculate the effluent limitations for metals. With a hardness of 400 the acute and chronic criteria are 21.5 µg/L and 7.31 µg/L for cadmium, respectively. The Basin Plan MCL for cadmium is 5 µg/L and more stringent than the freshwater criteria. Hence, the Basin Plan criteria was used to evaluate reasonable potential. This results in less stringent effluent limits for cadmium. However, the effluent limitations for cadmium ~~are calculated based on the criteria for human health protection from consumption of organism because it is more stringent than the freshwater aquatic life criteria.~~ This ~~ese~~ relaxation of effluent limitations ~~are~~ is consistent with the exceptions to the anti-backsliding requirements of the CWA and federal regulations, based on the consideration of new information (i.e., discharge monitoring reports, and RPA) obtained since the prior permit was issued. [CWA section 402(o)(2)]. The effluent limitations for lead, selenium, and silver were also calculated based on the CTR ~~and with~~ a hardness of 400 mg/L, and are more stringent than the limits in the previous Order.

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B. Special Provisions

1. Reopener Provisions

These provisions are based on 40 C.F.R. Section 123 and the previous permit. The Regional Water Board may reopen the permit to modify permit conditions and requirements. Causes for modifications include the promulgation of new federal regulations, modification in toxicity requirements, or adoption of new regulations by the State Water Board or Regional Water Board, including revisions to the Basin Plan or revisions to the Calleguas Creek TMDLs.

2. Special Studies and Additional Monitoring Requirements

a. **Initial Investigation Toxicity Reduction Evaluation Workplan.** This provision is based on section 4 of the SIP, Toxicity Control Provisions, which establishes minimum toxicity control requirements for implementing the narrative toxicity objective for aquatic life protection established in the basin plans of the State of California.

3. Best Management Practices and Pollution Prevention

This provision is based on section 122.44(k) and includes the requirement to develop and implement a SWPPP.

This Order does not include Pollution and Minimization Program because the monitoring data for priority pollutants submitted for the term of the previous permit indicated that there were no sample results reported as "Detected, but Not Quantified" (DNQ); and the "Method Detection Limits" (MDL) were less than the effluent limitations and the State Water Board Minimum Levels (MLs).

4. Construction, Operation, and Maintenance Specifications

This provision is based on the requirements of section 122.41(e) and Order No. 2009-0096-A01. It requires that the Discharger properly operate and maintain all facilities and systems used to achieve compliance with this Order.

5. Special Provisions for Municipal Facilities (POTWs Only) – Not Applicable

6. Other Special Provisions – Not Applicable

7. Compliance Schedules – Not Applicable

VII. RATIONALE FOR MONITORING AND REPORTING REQUIREMENTS

CWA section 308 and 40 C.F.R. section 122.41(h), (j)-(l), 122.44(i), and 122.48 require that all NPDES permits specify monitoring and reporting requirements. Water Code sections 13267 and 13383 also authorize the Regional Water Board to establish monitoring, inspection, entry, reporting, and recordkeeping requirements. The Monitoring and Reporting Program (MRP), Attachment E of this Order establishes monitoring, reporting, and recordkeeping requirements that implement federal and state requirements. The following provides the rationale for the monitoring and reporting requirements contained in the MRP for this Facility.

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