Genera, Sue@Waterboards

From: ROBERT FREEMAN <RFREEMAN@lawa.org>
Sent: Wednesday, July 25, 2012 4:43 PM
To: Kouyoumdjian, Patty@Waterboards
Cc: CHAO L. WANG; GEORGE F. RAPHAEL; KARIN CHRISTIE; LARRY J. POWELL; MICHAEL FELDMAN; NARGIS CHOUDHRY; SCOTT TATRO; Curtis, Chuck@Waterboards; Niemeyer, Kim@Waterboards; Kemper, Lauri@Waterboards
Subject: City of Los Angeles Objection to Hearing Procedures for CAO for Palmdale Reclamation Plant

Ms. Kouyoumdjian,

The Los Angeles World Airports (LAWA), on behalf of the City of Los Angeles (City), hereby requests a time extension to submit formal comments in response to California Regional Water Quality Control Board - Lahonton Region (Lahonton) "**Notice of Revised Proposed Cleanup and Abatement Order for County Sanitation District No. 20 of Los Angeles County and City of Los Angeles, Palmdale Water Reclamation Plant, Palmdale, Los Angeles County.**" Cleanup and Abatement Order No. R6V-2012-Proposed [July revision] WDID No. 6B190107069 requires County Sanitation District No. 20 of Los Angeles County and the City of Los Angeles (LACSD) to clean up and abate the effects of discharges from the Palmdale Water Reclamation Plant (PWRP). The language of the proposed Cleanup and Abatement Order conveys joint liability between the City and the LACSD, which is a change from the language of rescinded CAO R6V-2003-056, which designates the LACSD as Primary Discharger and the City as Secondary Discharger.

Lahonton requests that written comments regarding the proposed revised Cleanup and Abatement Order be submitted by 5PM of July 25, 2012 and states that adoption of the CAO will be considered at the Water Board's September 12 and 13, 2012 meeting. LAWA did not receive the above-cited Notice until mid-July and two weeks is not a reasonable or sufficient time frame for LAWA to prepare adequate comment regarding the language and technical merits of the proposed CAO, nor is there sufficient time provided to prepare for the September hearing date. The City must first retain legal counsel then allow counsel sufficient time to adequately review the case history and prepare formal comments to the proposed CAO, including the significant change to the City's designation as one of the Primary Dischargers. To that end, we are requesting that the comment period for the proposed CAO be extended and that the hearing date be changed to reflect that extension.

LAWA appreciates your understanding in this matter.

Robert D. Freeman
Airport Environmental Manager
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