



California Regional Water Quality Control Board

Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams
Agency Secretary

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Arnold Schwarzenegger
Governor

December 5, 2007

Mr. Y. Koby Cohen
Vice President, Quality Assurance
Suburban Water Systems
1211 E. Center Court Drive
Covina, CA 91724

Certified Mail
Return Receipt Requested
Claim No. 7001 2510 0002 7136

Dear Mr. Cohen:

REVISION OF COVERAGE UNDER GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT AND WASTE DISCHARGE REQUIREMENTS—SUBURBAN WATER SYSTEMS, PLANTS #121, 126, 139, 140, 142 & 151—SAN GABRIEL RIVER—REACH 8.C, WEST COVINA AND LA PUNTE, CALIFORNIA (NPDES NO. CAG994005, CI-7368)

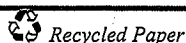
We received your letter dated February 12, 2007, requesting consolidation of several General NPDES Permits coverage issued to Suburban Water System (SWS). Currently, SWS discharges wellhead water from above referenced plants. We have completed our review of your request and consolidated various General NPDES permits issued to SWS. The consolidation is based on discharge to the same reach of the San Gabriel River. The following permits issued to SWS with CI Nos. 7368, CI-7607, CI-8410, CI-8420 and CI- 9130 have been consolidated into a new permit with CI No. 7368. We will terminate the above-mentioned existing permits coverage issued to SWS under the aforementioned CI numbers. A separate termination letter will be sent to you to this effect.

Discharge of groundwater generated from the wells from above referenced plants is regulated under NPDES General Permit No. CAG994005 (Order No. R4-2003-0108), *General National Pollutant Discharge Elimination System and Waste Discharge Requirements for Discharges of Groundwater from Potable Water Supply Wells to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties*, adopted by this Board on August 7, 2003.

Enclosed are your Waste Discharge Requirements, which also serve as your NPDES permit, consisting of Order No. R4-2003-0108 and revised Monitoring and Reporting Program No. CI-7368. The groundwater analytical data showed reasonable potential for toxics to exist in groundwater above the Screening Levels for Potential Pollutants of Concern in Potable Groundwater in Attachment A. Therefore, the effluent limits for toxic compounds in Section E.1. and E.2. are applicable to your discharge.

The groundwater discharges from the wells from the above referenced plants flows into storm drain, which drains into the Walnut Creek Wash, thence to the San Gabriel River, a water of the

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Y. Koby Cohen
Suburban Water Systems

December 5, 2007

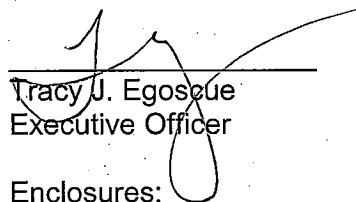
United States. Therefore, the discharge limits in Attachment B.8.c. of Order No. R4-2003-0108 are applicable to your discharge.

The Monitoring and Reporting Program requires you to implement the monitoring program on the effective date of coverage under this permit. All monitoring reports should be sent to the Regional Board, ATTN: Information Technology Unit. When submitting monitoring or technical reports to the Regional Board per these requirements, please include a reference to "Compliance File No. CI-7368 and NPDES No. CAG994005", which will assure that the reports are directed to the appropriate file and staff. Also, please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

We are sending a copy of Order No. R4-2003-0108 only to the applicant. For those on the mailing list, please refer to the Board Order previously sent to you. A copy of the Order will be furnished to anyone who requests it, or it can be obtained at our web site address: http://www.waterboards.ca.gov/losangeles/html/permits/general_permits.html

If you have any questions, please contact Namiraj Jain at (213) 620-6003.

Sincerely,



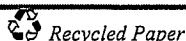
Tracy J. Egoscue
Executive Officer

Enclosures:

General NPDES No. CAG994005, Order No. R4-2003-0108
Fact Sheet
Monitoring and Reporting Program No. CI- 7368

cc: Environmental Protection Agency, Region 9, Permit Section (WTR-5)
U.S. Army Corps of Engineers
U.S. Fish and Wildlife Services, Division of Ecological Services
NOAA, National Marine Fisheries Service
Michael Levy, Office of Chief Counsel, State Water Resources Control Board
California Department of Fish and Game, Marine Resources, Region 5
California Department of Health Services, Environmental Branch
Los Angeles County, Department of Public Works, Waste Management Division
Los Angeles County, Department of Health Services
City Manager, West Covina
City Manager, La Punte
Jae Kim, Tetra Tech

California Environmental Protection Agency



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STATE OF CALIFORNIA
 CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
 LOS ANGELES REGION
 320 West 4th Street, Suite 200, Los Angeles, California 90013

FACT SHEET
REVISED WASTE DISCHARGE REQUIREMENTS
FOR
SUBURBAN WATER SYSTEMS
(SAN GABRIEL RIVER REACH 8.C—PLANT # 121, 126, 139, 140, 142 & 151)
NPDES NO. CAG994005, SERIES NO 083.
CI-7368

FACILITY ADDRESS

Various locations, see table below

FACILITY MAILING ADDRESS

23780 North Pine Street
 Santa Clarita, CA 91322

PROJECT DESCRIPTION:

Suburban Water Systems (SWS) proposes to consolidate various groundwater discharge permits issued to SWS. SWS proposes to combine discharge permits based on similar discharge quality where the water is drawn from the same aquifer and discharged to the same stream reach of San Gabriel River. In the past, Regional Board issued several General NPDES Permits to SWC for discharge of groundwater generated from potable water supply wells located at various locations in the City of West Covina and La Punte, California. This Fact Sheet is being revised to consolidate the related permits issued to SWS based on discharge to the same stream reach of the San Gabriel River. The following permits issued to SWS with CI Nos. 7368, CI-7607, CI-8410, CI-8420 and CI- 9130 have been consolidated into a new General NPDES permit with CI No. 7368.

SWS operates potable water supply wells listed in the Table below. The discharges covered by this permit include groundwater generated from potable water supply wells during purging for data collection, maintenance and rehabilitation activities. The pumped groundwater will first passed through a Tank 1 for coagulation, neutralization, and dechlorination, as necessary; then through a second Tank 2 for sedimentation, before being discharged into the San Gabriel River.

This authorization covers discharges from the following potable water supply wells:

Facility	Address	Latitude	Longitude
Plant 121 — Well Nos. W1	807 California Ave., West Covina	34° 03' 50"	117° 56' 12"
Plant 126 — Well 126 W2	2341 E. Rio Verde Drive, West Covina	34° 03' 50"	117° 56' 12"
Plant 139 — Well Nos. 2, 4, 5, & 6	187 N. Willow Ave., West Covina	34° 04' 00"	117° 57' 00"
Plant 140 — Wells W3, W4 & W5	1330 N. Willow Ave., La Punte	34° 03' 00"	117° 58' 00"
Plant 142 — Well W2	1331 Vine Ave., West Covina	34° 03' 00"	117° 57' 00"
Plant 151 — Well 151 W2	1403 W. Farlington St., West Covina	34° 03' 24"	117° 57' 05"

VOLUME AND DESCRIPTION OF DISCHARGE:

Up to 7.2 million gallons per day (mgd) of groundwater will be discharged from these wells during well development, pump repair and well testing. This high rate of discharge is necessary to determine the aquifer's productive capacity and to properly size the well pump. The high rate of discharge is usually short duration, 8 hours to 7 days. The discharge from above listed wells flows into Walnut Creek Wash thence to San Gabriel River, a water of the United States.

APPLICABLE EFFLUENT LIMITATIONS

Based on the information provided, the analytical data showed reasonable potential for toxics to exist in groundwater above the Screening Levels for Potential Pollutants of Concern in Potable Groundwater in Attachment A. Therefore, the effluent limits for toxic compounds in Section E.1. and E.2. are applicable to your discharge. The discharge flows into Walnut Creek Wash thence to San Gabriel River between Ramona Boulevard and Valley Boulevard which has a designated beneficial use of MUN (Potential). The effluent limitations in Attachment B.8.c are applicable to your discharge.

This table lists the specific constituents and effluent limitations applicable to the discharge.

Constituents	Units	Discharge Limitations	
		Daily Maximum	Monthly Average
Total Dissolved Solids	mg/L	1000	
Sulfate	mg/L	300	
Chloride	mg/L	100	
Boron	mg/L	1.5	
Nitrogen ¹	mg/L	10	
Total Suspended Solids	mg/L	150	50
Turbidity	NTU	150	50
BOD ₅ 20°C	mg/L	30	20
Settleable Solids	ml/L	0.3	0.1
Residual Chlorine	mg/L	0.1	
Copper (Cu)	µg/L	1000	
Lead (Pb)	µg/L	50	
Total Chromium	µg/L	50	
1,1 Dichloroethane	µg/L	5	
1,1 Dichloroethylene	µg/L	6	
1,1,1 Trichloroethane	µg/L	200	
1,1,2 Trichloroethane	µg/L	5	
1,1,2,2 Tetrachloroethane	µg/L	1	

¹ Nitrate-nitrogen plus nitrite nitrogen.

Constituents	Units	Discharge Limitations	
		Daily Maximum	Monthly Average
1,2 Dichloroethane	µg/L	0.5	
1,2-Trans Dichloroethylene	µg/L	10	
Tetrachloroethylene	µg/L	5	
Trichloroethylene	µg/L	5	
Carbon Tetrachloride	µg/L	0.5	
Vinyl Chloride	µg/L	0.5	
Total Trihalomethanes	µg/L	80	
Benzene	µg/L	1	
Methyl tertiary butyl ether (MTBE)	µg/L	5	

FREQUENCY OF DISCHARGE:

The high flow, short-term discharge of groundwater will be intermittent and seasonal.

REUSE OF WATER:

Offsite disposal of waste is not feasible due to the high cost of disposal. Discharge to the sewer is not feasible because of inaccessibility and the high cost of sewer connection. The property and the immediate vicinity have no landscaped areas that require irrigation. Since there are no feasible reuse options, the groundwater will be discharged to the San Gabriel River in compliance with the requirements of the attached Order.

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

**MONITORING AND REPORTING PROGRAM NO. CI-7368
FOR
SUBURBAN WATER SYSTEMS
(SAN GABRIEL RIVER REACH 8.C—PLANT # 121, 126, 139, 140, 142 & 151)
(NPDES NO. CAG994005, SERIES NO. 083)**

I. REPORTING REQUIREMENTS

- A. The discharger shall implement this monitoring program on the effective date of this permit. The discharger shall submit monitoring reports to the Regional Board by the dates in the following schedule:

<u>Reporting Period</u>	<u>Report Due</u>
January - March	May 15
April - June	August 15
July - September	November 15
October - December	February 15
Annual Summary Report	March 15

- B. The first monitoring report under this Program is due by February 15, 2008. The annual summary report, shall contain a discussion of the previous year's effluent monitoring data, as well as graphical and tabular summaries of the data. If there is no discharge during any reporting period, the report shall so state.
- C. All monitoring reports shall include the discharge limitations in the Order, tabulated analytical data, the chain of custody form, and the laboratory report (including but not limited to date and time of sampling, date of analyses, method of analysis and detection limits).
- D. Each monitoring report shall contain a separate section titled "Summary of Non-compliance" which discusses the compliance record and corrective action taken or planned that may be needed to bring the discharge into full compliance with waste discharge requirements. This section shall clearly list all non-compliance with waste discharge requirements, as well as all excursions of effluent limitations.
- E. Before commencing a new discharge, a representative sample of the effluent shall be collected and analyzed for toxicity and for all the constituents listed in the Fact Sheet and the test results must meet all applicable limitations of Order No. R4-2003-0108. (Note: This requirement does not apply to existing discharges.)

II. SAMPLE COLLECTION REQUIREMENTS (AS APPROPRIATE)

- A. Daily samples shall be collected each day.
- B. Weekly samples shall be collected on a representative day of each week.
- C. Monthly samples shall be collected on a representative day of each month.
- D. Quarterly samples shall be collected in February, May, August, and November.
- E. Semi-annual samples shall be collected in May and November.
- F. Annual samples shall be collected in November.

III. EFFLUENT MONITORING REQUIREMENTS

- A. Sampling station(s) shall be established at the discharge point and shall be located where representative samples of the effluent can be obtained. Provisions shall be made to enable visual inspections before discharge. In the event of presence of oil sheen, debris, and/or other objectionable materials or odors, discharge shall not commence until compliance with the requirements is demonstrated. All visual observations shall be included in the monitoring report.
- B. If monitoring result indicate an exceedance of a limit contained in Order R4-2003-0108, the discharge shall be terminated and shall only be resumed after remedial measures have been implemented and full compliance with the requirements has been ascertained.
- C. In addition, as applicable, following an effluent limit exceedance, the discharger shall implement the following accelerated monitoring program:
 - 1. Monthly monitoring shall be increased to weekly monitoring,
 - 2. Quarterly monitoring shall be increased to monthly monitoring,
 - 3. Semi-annually monitoring shall be increased to quarterly, and
 - 4. Annual monitoring shall be increased to semi-annually.

If three consecutive accelerated monitoring events demonstrate full compliance with effluent limits, the discharger may return to the regular monitoring frequency, with the approval of the Executive Officer of the Regional Board.

- D. The following shall constitute the discharge monitoring program:

Constituent	Units	Type of Sample	Minimum Frequency of Analysis
Flow	gal/day	totalizer	continuously
pH	pH units	grab	monthly
Temperature	°F	grab	monthly
Total Dissolved Solids	mg/L	grab	monthly
Sulfate	mg/L	grab	monthly

Constituent	Units	Type of Sample	Minimum Frequency of Analysis
Chloride	mg/L	grab	monthly
Boron	mg/L	grab	monthly
Nitrogen ¹	mg/L	grab	monthly
Total Suspended Solids	mg/L	grab	monthly
Turbidity	NTU	grab	monthly
BOD ₅ 20°C	mg/L	grab	monthly
Oil and Grease	mg/L	grab	monthly
Settleable Solids	ml/L	grab	monthly
Residual Chlorine	mg/L	grab	monthly
Copper (Cu)	µg/L	grab	monthly
Lead (Pb)	µg/L	grab	monthly
Total Chromium	µg/L	grab	monthly
1,1 Dichloroethane	µg/L	grab	monthly
1,1 Dichloroethylene	µg/L	grab	monthly
1,1,1 Trichloroethane	µg/L	grab	monthly
1,1,2 Trichloroethane	µg/L	grab	monthly
1,1,2,2 Tetrachloroethane	µg/L	grab	monthly
1,2 Dichloroethane	µg/L	grab	monthly
1,2-Trans Dichloroethylene	µg/L	grab	monthly
Tetrachloroethylene	µg/L	grab	monthly
Trichloroethylene	µg/L	grab	monthly
Carbon Tetrachloride	µg/L	grab	monthly
Vinyl Chloride	µg/L	grab	monthly
Total Trihalomethanes	µg/L	grab	monthly
Benzene	µg/L	grab	monthly
Methyl tertiary butyl ether (MTBE)	µg/L	grab	monthly
Perchlorate	µg/L	grab	annually
1-4 Dioxane	µg/L	grab	annually
N-Nitrosodimethylamine (NDMA)	µg/L	grab	annually
Acute Toxicity	% survival	grab	annually

IV. EFFLUENT TOXICITY TESTING

- A. The discharger shall conduct acute toxicity testing tests on 100% effluent grab samples by methods specified in 40 CFR Part 136 which cites USEPA's Methods for Measuring the Acute Toxicity of Effluents and Receiving Water to Freshwater and Marine Organisms, October 2002, (EPA/821-R-02-012) or a more recent edition. Submission of bioassay

¹ Nitrate-nitrogen plus nitrite-nitrogen.

results should include the information noted on pages 109-113 of the EPA/821-R-02-012 document.

- B. The fathead minnow, *Pimephales promelas*, shall be used as the test species for fresh water discharges and the topsmelt, *Atherinops affinis*, shall be used as the test species for brackish discharges. The method for topsmelt is found in USEPA's Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms, Third Edition, October 2002, (EPA/821-R-02-014).
- C. If the results of the toxicity test yields a survival of less than 90%, then the frequency of analyses shall increase to monthly until at least three test results have been obtained and full compliance with effluent limitations has been demonstrated, after which the frequency of analyses shall revert to annually. Results of toxicity tests shall be included in the first monitoring report following sampling.

V. GENERAL PROVISIONS FOR REPORTING

- A. The discharger shall inform this Regional Board 24 hours before the start of the discharge.
- B. All chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Health Services Environmental Laboratory Accreditation Program (ELAP) or approved by the Executive Officer. A copy of the laboratory certification shall be provided with the first monitoring report and each time a new and/or renewal is obtained from ELAP.
- C. Samples must be analyzed within allowable holding time limits as specified in 40 CFR Part 136.3. Proper chain of custody procedures must be followed and a copy shall be submitted with the report.
- D. As required in part H of Order No. R4-2003-0108, the monitoring report shall specify the USEPA analytical method used, the Method Detection Limit and the Minimum Level for each pollutant.

VI. COMPLIANCE DETERMINATION (AS APPLICABLE)

- A. Compliance with single constituent effluent limitation – If the concentration of the pollutant in the monitoring sample is greater than the effluent limitation and greater than or equal to the reported Minimum Level (see Monitoring and Reporting Requirements Section H.4. of Order R4-2003-0108), then the Discharger is out of compliance.
- B. Compliance with monthly average limitations - In determining compliance with monthly average limitations, the following provisions shall apply to all constituents:

- a. If the analytical result of a single sample, monitored monthly, quarterly, semi-annually, or annually, does not exceed the monthly average limit for that constituent, the Discharger has demonstrated compliance with the monthly average limit for that month.
- b. If the analytical result of a single sample, monitored monthly, quarterly, semi-annually, or annually, exceeds the monthly average limit for any constituent, the Discharger shall collect four additional samples at approximately equal intervals during the month. All five analytical results shall be reported in the monitoring report for that month, or 45 days after results for the additional samples were received, whichever is later.

When all sample results are greater than or equal to the reported Minimum Level (see Monitoring and Reporting Requirements Section H.4. of Order R4-2003-0108), the numerical average of the analytical results of these five samples will be used for compliance determination.

When one or more sample results are reported as "Not-Detected (ND)" or "Detected, but Not Quantified (DNQ)" (see Monitoring and Reporting Requirements Section H.4. of Order R4-2003-0108), the median value of these four samples shall be used for compliance determination. If one or both of the middle values is ND or DNQ, the median shall be the lower of the two middle values.

- c. In the event of noncompliance with a monthly average effluent limitation, the sampling frequency for that constituent shall be increased to weekly and shall continue at this level until compliance with the monthly average effluent limitation has been demonstrated.
 - d. If only one sample was obtained for the month or more than a monthly period and the result exceed the monthly average, then the Discharger is in violation of the monthly average limit.
- C. Compliance with effluent limitations expressed as a sum of several constituents – If the sum of the individual pollutant concentrations is greater than the effluent limitation, then the Discharger is out of compliance. In calculating the sum of the concentrations of a group of pollutants, consider constituents reported as ND or DNQ to have concentrations equal to zero, provided that the applicable ML is used.
- D. Compliance with effluent limitations expressed as a median – in determining compliance with a median limitation, the analytical results in a set of data will be arranged in order of magnitude (either increasing or decreasing order); and
- a. If the number of measurements (n) is odd, then the median will be calculated as $= X_{(n+1)/2}$, or

- b. If the number of measurements (n) is even, then the median will be calculated as $= [X_{n/2} + X_{(n/2)+1}] / 2$, i.e. the midpoint between the n/2 and n/2+1 data points.
- E. In calculating mass emission rates from the monthly average concentrations, use one half of the method detection limit for "Not Detected" (ND) and the estimated concentration for "Detected, but Not Quantified" (DNQ) for the calculation of the monthly average concentration. To be consistent with section VI.C., if all pollutants belonging to the same group are reported as ND or DNQ, the sum of the individual pollutant concentrations should be considered as zero for the calculation of the monthly average concentration.

VII. NOTIFICATION

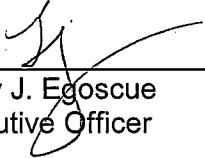
- A. The discharger shall notify the Executive Officer in writing prior to discharge of any chemical which may be toxic to aquatic life. Such notification shall include:
 - 1. Name and general composition of the chemical,
 - 2. Frequency of use,
 - 3. Quantities to be used,
 - 4. Proposed discharge concentrations and,
 - 5. EPA registration number, if applicable.

No discharge of such chemical shall be made prior to obtaining the Executive Officer's approval.
- B. The discharger shall notify the Regional Board via telephone and/or fax within 24 hours of noticing an exceedance above the effluent limits in Order No. R4-2003-0108. The discharger shall provide to the Regional Board within 14 days of observing the exceedance a detailed statement of the actions undertaken or proposed that will bring the discharge into full compliance with the requirements and submit a timetable for correction.

VIII. MONITORING FREQUENCIES

Monitoring frequencies may be adjusted by the Executive Officer to a less frequent basis if the discharger makes a request and the request is justified by statistical trends of monitoring data submitted. However, monitoring frequency may also increase based on site-specific conditions.

Ordered by:



Tracy J. Egoscue
Executive Officer

Date: December 5, 2007

/NJ