
Los Angeles Regional Water Quality Control Board

October 2, 2015

Mr. Rich Nagel
General Manager
West Basin Municipal Water District
17149 South Avalon Blvd, Suite 210
Carson, CA 90746-1296

APPROVAL OF SUPPLEMENTAL ENGINEERING REPORT FOR INDUSTRIAL COOLING AND IRRIGATION AT VIRCO-TORRANCE FACILITY USING RECYCLED WATER FROM EDWARD C. LITTLE WATER RECYCLING FACILITY (WRR 01-043, CI 7453, NPDES NO. CA0063401, CI-7449)

Dear Mr. Nagel:

On September 3, 2015, the Los Angeles Regional Water Quality Control Board (Regional Water Board) received a letter requesting approval of a Supplemental Engineering Report (Report) which would allow the West Basin Municipal Water District (West Basin) to distribute recycled water to the VIRCO-Torrance Facility (VIRCO) for irrigation, cooling towers and tube-milling cooling tanks under the requirements specified in Water Recycling Requirements Order No. 01-043, approved on March 29, 2001, and Engineering Report approved by the Division of Drinking Water (DDW) on April 14, 1994. The supplemental report is required by Section II.E. of Order 01-043.

The uses proposed for the VIRCO facility are irrigation and cooling. The recycled water would replace potable water used for irrigation of landscape at the facility. Also, recycled water would receive on-site microfiltration, reverse-osmosis and softening, before entering three onsite cooling towers and two tube-mill cooling tanks. Currently, potable water is used for this purpose. Other potable water uses for domestic supply, industrial processes, wash tank, clear water tank, sealing rinse tanks, oil separation tank and fire suppression would remain unchanged. A backup connection across an air-gap would allow potable supply to augment recycled water supply for cooling, if necessary.

Kraig Erickson, from VIRCO's contractor RMC, reported to staff in a phone call on September 8, 2015, that the cooling towers are to reduce the temperature in the aluminum and steel tube-milling cooling tanks. As a result, Order No. 01-043 requires that West Basin insure recycled water use, like that which would take place at the VIRCO facility, complies with the following specification in Section II of the Order on page 7.

- "F. Whenever a cooling system, using recycled water in conjunction with an air conditioning facility, utilizes a cooling tower or otherwise creates a mist that could come into contact with employees or members of the public, the cooling system shall comply with the following:

1. A drift eliminator shall be used whenever the cooling system is in operation.
2. A chlorine, or other, biocide shall be used to treat the cooling system recirculating water to minimize the growth of *Legionella* and other microorganisms."

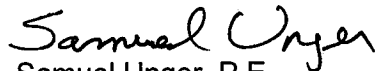
The change from potable to recycled water use is not expected to impact surface or groundwater quality. Specifically, the water quality of the discharge from the tube-milling tanks to the sewer is monitored and subject to a pre-treatment agreement with County Sanitation Districts of Los Angeles County prior to discharge to the Ocean outfall at the Joint Plant. As a result, pollutant loading from this recycled water use is already regulated by a local authority delegated by this Regional Water Board.

The Regional Water Board staff has reviewed the information submitted by VIRCO and approves the proposed use with the conditions (1) that VIRCO's Supplemental Engineering Report also receives approval from DDW, (2) that the existing limitations on cooling water are met at the VIRCO-Torrance Facility, and (3) that water quality in the discharge to the sewer continue to comply with the existing pre-treatment requirements.

West Basin's use of recycled water as described in the Report is consistent with the existing recycled water distribution program permitted under Order No. 01-043. Delivery of water to an additional cooling system does not require an amendment to the existing Order before this project can proceed.

If you have any questions, please contact Cris Morris at (213) 620-2083 or Elizabeth Erickson at (213) 576-6665.

Sincerely,


Samuel Unger, P.E.
Executive Officer

cc: Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
State Water Resource Control Board Division of Drinking Water
State Water Resource Control Board Division of Water Rights
NOAA, National Marine Fisheries Service
Department of Interior, U.S. Fish and Wildlife Service
State Water Resources Control Board, Office of Chief Counsel
Department of Fish and Wildlife, Region 5
State Water Resources Control Board, Drinking Water Field Operations – Southern
California – Shu-Fang Orr
California Department of Water Resources, Water Recycling Program – Nancy King
California State Parks and Recreation
State Coastal Conservancy
City of Los Angeles - Hassan Rad, Enrique Zaldivar, Varouj Abkian, and Traci Minimide
Los Angeles County, DPW, Watershed Division
Los Angeles County, Department of Health Services
Los Angeles County, Department of Public Works - Chris Stone.
Water Replenishment District of Southern California
West Basin Municipal Water District
Heal the Bay
Environment Now
Los Angeles Waterkeeper
Natural Resources Defense Council
Southern California Coastal Water Research Project
Friends of the Los Angeles River
Los Angeles and San Gabriel Rivers Watershed Council
Sierra Club
San Gabriel and lower Los Angeles Rivers and Mountains
Conservancy