CALLEGUAS CREEK

Watershed Management Plan

A COOPERATIVE STRATEGY FOR
RESOURCE MANAGEMENT & PROTECTION

November 13, 2023

***Via email*:** losangeles@waterboards.ca.gov, namiraj.jain@waterboards.ca.gov

Namiraj Jain
California Regional Water Quality Control Board,
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, California, 90013

Subject: Comment Letter – Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, General NPDES Permit No. CAG994004

Dear Mr. Jain:

The Stakeholders Implementing Total Maximum Daily Loads (TMDLs) in the Calleguas Creek Watershed (Stakeholders) appreciate the opportunity to provide comments on the Los Angeles Regional Water Quality Control Board's (Regional Board) Tentative Order (TO) *Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, General NPDES Permit No. CAG994004* (General Order). The Stakeholders consist of agricultural, wastewater, and municipal storm drain (MS4) dischargers that are responsible parties to six effective TMDLs.[1] The TO provides updates and improvements to the

[1] The Stakeholders consist of the following organizations: Camrosa Water District, Camarillo Sanitary District, Ventura County Waterworks District No. 1, City of Simi Valley, City of Thousand Oaks, City of Camarillo, City of Moorpark, Ventura County Watershed Protection District, County of Ventura, Caltrans, Members of the Ventura County Agricultural Irrigated Lands Group, US Navy, California State Parks

existing General Order. In support of this, the Stakeholders respectfully provide the following input on the draft permit.

Comments and Suggested Corrections Applicable to the Entire TO

1. Throughout the TO, it appears the Maximum Daily Effluent Limitation (MDEL) is consistently expressed as twice the Average Monthly Effluent Limitation (AMEL). Please explain the relationship between the water quality objectives established in the Basin Plan and how the Screening Levels (Attachment E) were derived from these values.

2. Many of the Volatile Organic Compounds have Screening Levels or effluent limits that are lower than the required minimum levels (ML) in Appendix A. For some of these constituents, Table 4 includes Footnote 5, which states:

   If the reported detection level is greater than the effluent limit for this constituent, then a non-detect using ML detection is deemed to be in compliance.

   In the 2018 Permit (Order No. R4-2018-0125, General NPDES Permit No. CAG994004 Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties), this footnote was applied to effluent limits for the following constituents but was not applied to these limits in the TO. Because the analytical methods do not provide reliable results for the effluent limits prescribed in the permit, these constituents should also include Footnote 5 in all tables where effluent limits are prescribed:

2,3,7,8 TCDD or Dioxin	Indeno(1,2,3-cd)Pyrene
Acrylonitrile	Aldrin
2,4,6-Trichlorophenol	Chlordane
Benzidine	4,4'-DDT
Benzo(a)Anthracene	4,4'-DDE
Benzo(a)Pyrene	4,4'-DDD
Benzo(b)Fluoranthene	Dieldrin
Benzo(k)Fluoranthene	alpha-Endosulfan
Chrysene	beta-Endosulfan
Dibenzo(a,h)Anthracene	Endrin
3,3 Dichlorobenzidine	Heptachlor
1,2-Diphenylhydrazine	Heptachlor Epoxide
Hexachlorobenzene	Toxaphene
Polychlorinated biphenyls (PCBS)	Di-isopropyl ether (DIPE)

3. A number of typographical or other errors were identified in the TO. The following table presents the TO location, identified errors, and suggested corrections for Water Board consideration.

Proposed Corrections for the Tentative Order			
Location in the TO	**Identified Error**	**Suggested Correction**	**Reasoning for Correction**
List of Attachments, Frontis Page 5	TOC page for Attachment C listed as 1	Update to C-1	Attachment C page numeration is incomplete
Table 4B, Page 19	AMEL for 1,1,2,2-tetrachloroethane is listed as NA[6]	Remove superscript [6]	There is no Footnote 6 in the TO
Table 4B, Page 21	4,4'-DDD AMEL listed as 0.00083 ug/L	Change the AMEL for 4,4'-DDD to 0.00084 ug/L	0.00084 is consistent with value in Appendix B, Attachment E, and Table F-4 for non-MUN waters
Table 4B, Page 21	Aldrin MDEL listed as 0.00027 ug/L	Change to 0.00028 ug/L	0.00028 is consistent with values in Appendix B, Attachment E, and Table F-4 for non-MUN waters
Table 4B, Page 21	Aldrin AMEL listed as 0.00013 ug/L	Change to 0.00014 ug/L	0.00014 is consistent with values in Appendix B, Attachment E, and Table F-4 for non-MUN waters
Table 4B, Page 21	Alpha-BHC MDEL listed as 0.26 ug/L	Change to 0.026 ug/L	0.026 is consistent with Table F-4 for non-MUN waters
Table 4A, Page 18 Table 4B, Page 21	1,4 Dichlorobenzene listed as AMEL 2.5 ug/L, MDEL 5 ug/L	Verify and/or revise these values	Inconsistent with values in Table F-4 for MUN and non-MUN waters
Table 4A, Page 19 Table 4B, Page 23	MDEL for Di-isopropyl ether (DIPE) includes Footnote 2	Remove superscript [2]	There is no applicable Footnote 2 for Table 4
Table 4B, Page 23	MDEL for 2,3,7,8-TCDD (Dioxin) listed as 0.00000002 ug/L	Change to 0.000000028 ug/L	0.000000028 ug/L is the CTR value
Table 20, MDEL and AMEL Tables, Page 32 Table 21 MDEL and AMEL Tables, Page 33	Shown as “San Gabreil River”	Change to San Gabriel River	Typo
Table 25, Page 34	Shown as “Dleldrin”	Change to Dieldrin	Typo
Table 30, Page 37	PAHs Sediment Effluent Limit listed as 4,0220	Change to 4,022	Value has extra 0
Pages F-14 – F-15, Section 2	Shown as “BODs 20°C”	Change to BOD_5 20°C	Typo
Page F-24, second paragraph	CWA.,	Remove extraneous period	Typo
Table F-4, Page F-29	Constituents are missing from the Pesticides and PCBs section of the table	Add the following constituents: 4,4'-DDT alpha-Endosulfan beta-Endosulfan	Missing constituents

Proposed Corrections for the Tentative Order			
Location in the TO	**Identified Error**	**Suggested Correction**	**Reasoning for Correction**
		Chlordane Dieldrin Endrin Heptachlor Heptachlor Epoxide Toxaphene	
Table F-4, Page F-32	N-Nitrosodimethyl amine (NDMA) AMEL listed as "0.00069 3"	Remove extraneous 3	2018 footnote not removed
Table F-4, Page F-32	Pentachlorophenol is missing from the Semi-Volatile Organic Compounds section of the table	Add Pentachlorophenol	Missing constituent
Table F-4, Page F-32	Di-isopropyl ether (DIPE) MDEL Mun is listed as "0.8 2"	Remove extraneous 2	2018 footnote not removed
Table F-4, Page F-33	All of the 2,3,7,8-TCDD (Dioxin) MDEL, AMELs are listed with extra zero	Change to 10^{-8}	Too many decimal places
Table F-4, Page F-33	Constituents are missing from the Metals section of the table	Add silver, thallium and zinc	Missing constituents

Comments and Suggested Updates Applicable to Calleguas Creek, its Tributaries and Mugu Lagoon

4. The references to acute toxicity effluent limits in the TO should be clarified to explain that acute toxicity limits do not apply to Calleguas Creek, its Tributaries and Mugu Lagoon. Calleguas Creek, its Tributaries and Mugu Lagoon have chronic toxicity limits that are presented separately in Table 24. The chronic toxicity test is more sensitive than the acute test, so separate acute toxicity testing and effluent limit compliance is not needed in the Calleguas Creek watershed.

5. The AMEL values in Table 26 (WQBELs based on Basin Plan Section 7-19 - Calleguas Creek Watershed Metals and Selenium TMDL WLAs – Dry Weather) do not agree with values presented in the Dry Monthly Average column of the Waste Load Allocations section of the Basin Plan (Page 7-231 of the Basin Plan). The values in Table 26 for Copper, Nickel, and Selenium are consistently lower than the Basin Plan Waste Load Allocations (WLAs). Please review and correct the AMEL Dry Weather values based on the Basin Plan WLAs and update the Dry Weather MDEL values which appear to be derived mathematically from the AMEL values.

6. The MDEL values in Table 27 (WQBELs based on Basin Plan section 7-19 - Calleguas Creek Watershed Metals and Selenium TMDL WLAs –Wet Weather) for copper and nickel are not presented in a consistent manner with the Wet Daily Maximum column of the Waste Load Allocations section of the Basin Plan (Page 7-231). For both metals, Table 27 incudes mathematical rounding differences from the Basin Plan values, with Table 27 values for copper slightly lower than the Basin Plan and the values for Nickel (other than for Reaches 1 and 2) are slightly higher

than the Basin Plan. Please review and correct the MDEL Wet Weather values based on the Basin Plan WLAs and update the Wet Weather AMEL values which appear to be derived mathematically from the MDEL values.

Corrections Needed for WQBEL Calculation Example in Attachment F

7. There are numerous mistakes in the example calculations for lead WQBELs on page F-20 to F-23. The calculations should be revised to show the correct CTR values in Table F-4 and how the translators and hardness adjustments are applied in the subsequent formulas.

On behalf of the Stakeholders, thank you again for the opportunity to comment on this TO.

Sincerely,

Al Sexton

Al Sexton
Chair, Stakeholders Implementing TMDLs in the Calleguas Creek Watershed

web site: www.calleguas.com

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November 13, 2023

Norma Camacho, Chair
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Transmitted via email: losangeles@waterboards.ca.gov and namiraj.jain@waterboards.ca.gov

Subject: Comments on tentative NPDES Permit, **Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties**, NPDES No. CAG994004.

Dear Ms. Camacho and Board Members:

Calleguas Municipal Water District (Calleguas) provides water service in Ventura County and approximately three-quarters of Ventura County residents receive water purchased by retail purveyors from Calleguas' distribution system. Calleguas' distribution system extends from the coastal area of the Oxnard inland to the county line east of the City of Simi Valley. As part of construction projects located within the Calleguas Creek watershed, Calleguas periodically obtains and discharges ground water under the subject General Permit. Calleguas appreciates the opportunity to provide comments on the proposed Tentative Order.

Comment: Volatile Organic Compounds Minium Levels and Effluent Limitations

Many of the Volatile Organic Compounds have effluent limitations that are lower than the minimum levels specified in Appendix A of the proposed Tentative Order. For some of the constituents where this is the case, footnote 5 (Table 4), provides the approach for determining compliance where the reported detection level is lower than that of the effluent limitation:

If the reported detection level is greater than the effluent limit for this constituent, then a non-detect using ML detection is deemed to be in compliance.

This footnote has been removed from 28 constituents that were so annotated in the 2018 Order. These constituents still have specified effluent limits lower than the minimum levels in Appendix A.

Recommendation

Add footnote 5 to all the constituents that have effluent limits lower than the minimum levels in Appendix A including the following.

1. 2,3,7,8 TCDD or Dioxin
10. Dibenzo(a,h)Anthracene
19. 4,4'-DDD

2. Acrylonitrile
3. 2,4,6-Trichlorophenol
4. Benzidine
5. Benzo(a)Anthracene
6. Benzo(a)Pyrene
7. Benzo(b)Fluoranthene
8. Benzo(k)Fluoranthene
9. Chrysene
11. 3,3 Dichlorobenzidine
12. 1,2-Diphenylhydrazine
13. Hexachlorobenzene
14. Indeno(1,2,3-cd)Pyrene
15. Aldrin
16. Chlordane
17. 4,4'-DDT
18. 4,4'-DDE
20. Dieldrin
21. alpha-Endosulfan
22. beta-Endosulfan
23. Endrin
24. Heptachlor
25. Heptachlor Epoxide
26. Polychlorinated biphenyls (PCBS)
27. Toxaphene
28. Di-isopropyl ether (DIPE)

Comment Acute Toxicity Testing for Discharges in the Calleguas Creek Watershed

The proposed Tentative Order includes references to acute toxicity effluent limitations including Table 8 that notes the limitations apply to all dischargers. Calleguas Creek, its tributaries, and Mugu Lagoon have chronic toxicity limits that are presented in Table 24 of the proposed Tentative Order. The chronic toxicity test is more sensitive than the acute test, so separate acute toxicity testing and effluent limitation compliance is not needed in the Calleguas Creek watershed.

Recommendation

Revise Table 8 and other references in the proposed Tentative Order to clarify that acute toxicity testing and the related effluent limitation is not required for discharges to Calleguas Creek, its tributaries, and Mugu Lagoon.

Comment Average Monthly Effluent Limitations (AMEL) and Maximum Daily Effluent Limitations (MDELs) for Dry Weather Discharges in the Calleguas Creek Watershed

Table 26 provides the AMELs for dry weather discharges in the Calleguas Creek watershed. These effluent limitations are based upon section 7.19, Calleguas Creek Watershed Metals and Selenium TMDL, of the *Water Quality Based Effluent Limitations from the Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*. The AMEL values in Table 26 of the proposed Tentative Order for Copper, Nickel, and Selenium are consistently lower than the Basin Plan Waste Load Allocations (WLAs). Additionally, the Dry Weather MDELs in the proposed tentative order appear to be derived mathematically from the AMEL values and not on the Basin Plan WLAs.

Recommendation

Review and revise the Dry Weather AMELs and MDELs based on the Basin Plan WLAs.

Calleguas appreciates this opportunity to provide comments to clarify the proposed Tentative Order and looks forward to reviewing the revised Tentative Order.

Sincerely

Fernando Baez, P.E.
Manager of Engineering

Cc: Namiraj Jain, LARWQCB


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Heal the Bay


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FOUNDATION
SOUTH BAY


WeTap
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The Environmental Justice Coalition for Water
Water Justice for All


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coalition


NRDC


Social Eco Education

November 13, 2023

California Regional Water Quality Control Board
Los Angeles Region
ATTN: Namiraj Jain
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Sent via email to: losangeles@waterboards.ca.gov

RE: COMMENTS ON TENTATIVE NPDES PERMIT, WASTE DISCHARGE REQUIREMENTS FOR DISCHARGES OF GROUNDWATER FROM CONSTRUCTION AND PROJECT DEWATERING TO SURFACE WATERS IN COASTAL WATERSHEDS OF LOS ANGELES AND VENTURA COUNTIES, NPDES NO. CAG994004

To Chair Camacho and Members of the Los Angeles Regional Water Quality Control Board:

The undersigned groups are dedicated to protecting, enhancing, and restoring waters and aquatic ecosystems of Southern California. We would like to recognize that the waters we work to protect are part of unceded Indigenous land. The scope of our work takes place across the lands of coastal Indigenous Peoples and Native Nations of the Tongva, Chumash, Fernandeño Tataviam Band of Mission Indians, and Kizh Nation tribes, among others.[1] We would like to acknowledge and pay our respects to elders past, present, and emerging, as they continue their stewardship of these lands and waters.

We appreciate the efforts of staff from the Los Angeles Regional Water Quality Control Board (Regional Board) to protect surface water quality in the presence of dewatering discharges with water quality limits that reflect the California Toxic Rule and the Los Angeles Basin Plan, monitoring for per-and polyfluoroalkyl substances (PFAS), as well as monitoring for toxicity using the test for significant toxicity. We also commend staff for exploring opportunities for beneficial reuse of this discharged groundwater. However, we have remaining concerns about the extent of water loss permitted through dewatering activities, and the impacts of that water loss on our ecosystems and in our communities.

On behalf of Sierra Club, Heal the Bay, WeTap, SoCal 350, Environmental Justice Coalition for Water, Desal Response Group, Social Eco Education, LA Waterkeeper, GreenLA Coalition, Natural Resources Defense Council (NRDC), and Surfrider Foundation South Bay Chapter, we submit the following comments concerning the tentative Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Tentative Dewatering Permit).

- The Regional Board must provide publicly accessible data for the total volume of water loss authorized under the Tentative Dewatering Permit, to be updated annually.
- The Regional Board must require beneficial reuse of all groundwater extracted during dewatering activities.

These recommendations are discussed in further detail below.

[1] Native Lands Digital. 2023. https://native-land.ca/

The Regional Board must provide publicly accessible data for the total volume of water loss authorized under the Tentative Dewatering Permit, to be updated annually.

Dewatering, particularly with respect to construction and other projects, is the process of removing groundwater to create a dry working environment using pumps, wells, sumps, or other drainage systems, which then must be discharged offsite. Throughout recent recorded history, California has experienced periodic droughts including the most recent drought spanning 2020-2022. These drought periods are not only getting longer, but are also coupled with rising temperatures creating increasingly hot and dry conditions; a process called aridification. This trend led to the issuance of Water Conservation Emergency Regulations by the State Water Resources Control Board and the announcement of a statewide Water Strategy for a Hotter, Drier California by Governor Newsom.[2,3] The extraction of groundwater and soil moisture associated with the dewatering process without replenishment is irresponsible, particularly in Southern California where we face chronic water scarcity, and it goes directly against the movement towards a sustainable and reliable water future for California. In addition, dewatering can cause the permanent displacement of water leading to subsidence and property damage, tree die offs, and the drying of streams and tributaries.

In 2010, The City of Los Angeles estimated that no less than 356 million gallons of groundwater were extracted and discharged annually between 241 permitted dewatering projects (Exhibit 1). The exact value is unknown due to a lack of proper reporting and verification, and the estimate is now dated, with increased construction activities over the past thirteen years, including in West Hollywood where community members have observed consistent and significant flow associated with the Melrose Triangle Project.[4] The cumulative impact of the Tentative Dewatering Permit is definitely enormous, but currently unquantified. As one example, the Santa Monica Basin supplies a significant amount of the City of Santa Monica's water.[5] This groundwater basin has a Sustainable Groundwater Plan (SGP) approved by the Department of Water Resources, yet the SGP does not mention dewatering, and monitoring data on dewatered volumes and discharge volumes are lacking despite significant construction dewatering associated with building and metro line extension construction along the Wilshire corridor.[6]

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[2] California State Water Resources Control Board. 2023. *Water Conservation Emergency Regulations.* Available at: https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/regs/emergency_regulation.html

[3] Office of Governor Gavin Newsom. 2022. *Governor Newsom Announces Water Strategy For a Hotter, Drier California.* Available at: https://www.gov.ca.gov/2022/08/11/governor-newsom-announces-water-strategy-for-a-hotter-drier-california/

[4] WeHo Community News. 2022. *WeHo lets developers drain our aquifer while forcing us to conserve water*. Available at: https://wehoville.com/2022/09/13/weho-lets-developers-drain-our-aquifer-while-forcing-us-to-conserve-water/

[5] City of Santa Monica. 2021. *2020 Urban Water Management Plan.* Available at: https://www.santamonica.gov/Media/Users/smgov_5Calfredo_2Egonzalez/WRPP/2020%20UWMP%20_Final%20June%202021.pdf

[6] Santa Monica Basin Groundwater Sustainability Agency. Prepared by: DUDEK. 2022. *Groundwater Sustainability Plan for the Santa Monica Groundwater Subbasin.* Available at: https://santamonica.gov/media/Public%20Works/Water%20Resources/Santa_Monica_Subbasin_GSP.pdf

The Regional Board must provide publicly accessible data for the total volume of water loss authorized under the Tentative Dewatering Permit. We request that new requirements be added to Attachment C – Notice of Intent of the Tentative Dewatering Permit (under Section 6: Project Information) for a water loss analysis over the full discharge duration, and a climate impact assessment. The water loss analysis must provide a total estimated volume for water loss over the duration of the construction project, and an annual average post-construction if dewatering is necessary in perpetuity to prevent flooding of subsurface features after construction is complete. The Regional Board must compile all estimated water loss volumes, to be made publicly accessible on the Regional Board website, in accordance with The Open and Transparent Water Data Act (AB1755, Dodd). The climate impact assessment must investigate the extent of groundwater subsidence resulting from dewatering activities, and identify any associated negative impacts, such as subsidence and tree loss.

The Regional Board must require beneficial reuse of all groundwater extracted during dewatering activities.

The groundwater loss of 356 million gallons per year, estimated by the City of Los Angeles in 2010, would have been enough to serve approximately 2,200 households if reused, but instead that discharged groundwater continues to be thrown away along with the many beneficial uses it offers. Under various local ordinances and state laws, the wasteful use of water is illegal. Water suppliers must comply with water loss standards, individuals must comply with water restrictions and prohibitions on wasteful water uses,[7] and new development or redevelopment must comply with applicable low impact development (LID) requirements that support sustainability post-construction. Most importantly, the California Water Code requires that water resources be put to beneficial use to the fullest extent possible. These principles of water conservation and prevention of waste must apply to dewatering activities, as well.

The City of Palo Alto in Northern California recognized this need, and, in 2016, codified regulations for dewatering activities to minimize the pumping and discharge of groundwater.[8] Southern California must take similar action. With the renewal of this dewatering permit, the Regional Board is in the perfect position to lead by example, and require the beneficial reuse of groundwater from construction and project dewatering.

Considering the impacts of dewatering discussed above, local conservation and reuse must be prioritized whenever feasible, and action taken should be in response to the impacts identified through the climate impacts assessment, requested above. Conservation and reuse can be achieved through on-site reuse (e.g. irrigation at the Los Angeles National Cemetery for dewatering projects in Westwood and the surrounding area); diversion to local spreading grounds, dry wells, or other local opportunities for infiltration to recharge the aquifer pumped for project dewatering; or discharge to waterways that experience water loss as a result of

[7] Examples of wasteful water uses that are prohibited by law include using potable water to wash sidewalks and driveways, using hoses without automatic shutoff nozzles to wash motor vehicles, using potable water in ornamental fountains or decorative water features that do not recirculate the water, and irrigating non-functional turf with potable water.

[8] City of Palo Alto. 2020. Regulations for Groundwater Dewatering during Construction of Below Ground Structures. Available at: regulations-for-groundwater-dewatering-during-construction-of-below-ground-structures-2021.pdf (cityofpaloalto.org)

dewatering activities. If these options are infeasible, the water may be diverted to the sanitary sewer. The diversions would need to be authorized and paid for, but capacity is unlikely to be an issue during dry weather considering that many facilities currently operate under capacity, and expanded conservation efforts will only reduce average daily flow.[9] If none of these reuse or diversion options are feasible, supplemental LID features may be implemented to replenish any interim groundwater loss, and mitigate any permanent loss.

We commend the Regional Board for including a requirement to consider conservation and reuse under Attachment C, Section 6 of the Tentative Dewatering Permit:

> "3) Summary of feasibility study on conservation, reuse, and/or alternative disposal methods of wastewater. For discharges within the City of Los Angeles, provide information from the City on impracticability to discharge all wastewater to the Sanitary sewer. Where full or partial reuse is not possible, provide reasons why reuse cannot be achieved."

We request that the Regional Board add prioritization for local conservation and reuse, with alternatives for sewer diversion and supplemental LID features, when necessary and fully justified. The Regional Board must also require that the results of the feasibility study, reported in the Notice of Intent, be implemented by the permittee. Taking no action towards the beneficial reuse of groundwater from construction and project dewatering cannot be an option. In all cases, supplemental LID features must be required to mitigate any dewatering required to continue in perpetuity post-construction to prevent development flooding.

With the potential for local infiltration, depending on the results of the feasibility study, the Regional Board must include groundwater receiving water limits within the Tentative Dewatering Permit, to be applied when appropriate.

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[9] For example, the LA County Sanitation District Warren Water Resource Facility has capacity to treat 400 million gallons per day (MGD) of wastewater, but currently receives only 250 MGD. Current plans are in place to purify and reuse that flow under the Pure Water Southern California project. Given that number is down from 330 MGD in 2020, expanded conservation activities may mean that Pure Water Southern California could also operate under capacity without supplemental flow from other sources. We must maximize both conservation efforts and use of recycled water in Los Angeles to secure our water future.

Thank you for the opportunity to comment on the tentative Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. We look forward to continuing our collaborative work with the Los Angeles Regional Water Quality Control Board to preserve, enhance, and restore California waters for all beneficial uses. If you have any questions concerning this comment letter, please contact Charming Evelyn from Sierra Club Angeles Chapter via email at bcharmz@aol.com and Annelisa Moe from Heal the Bay via email at amoe@healthebay.org.

Sincerely,

Charming Evelyn
Chair - Water Committee
Vice-Chair - Env. & Social Justice Committee
Sierra Club Angeles Chapter
Co-Chair Sierra Club CA Water Committee

Annelisa Ehret Moe
Water Quality Scientist
Heal the Bay

Evelyn Wendell
Founder
WeTap

Jack Eidt
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SoCal 350

Esperanza Vielma
Executive Director
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Desal Response Group

Martha Camacho-Rodriguez
Director/Educator
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Maura Monagan
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LA Waterkeeper

Ava Farriday
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GreenLA Coalition

Dr. Mark Gold
Director of Water Scarcity Solutions
People and Communities Program
NRDC

Craig W. Cadwallader
Policy Coordinator
Surfrider Foundation South Bay Chapter

cc by email: Namiraj Jain, Water Resources Control Engineer, California Regional Water Quality Control Board, Los Angeles Region, Namiraj.Jian@waterboards.ca.gov.

Department of Water and Power the City of Los Angeles

ANTONIO R. VILLARAIGOSA
Mayor

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Interim General Manager
RAMAN RAJ
Chief Operating Officer

March 9, 2010

The Honorable City Council
Office of the City Clerk
Room 395, City Hall
Mail Stop 160

Attention: Councilmember Jan Perry
Chair, Energy and Environment Committee

Honorable Members:

Subject: Groundwater Discharge - Council File No. 09-1857

This is a follow-up to the Los Angeles Department of Water and Power's (LADWP) enclosed August 21, 2009, letter submitted in response to the Los Angeles City Council Energy and Environment Committee's July 24, 2009, Motion (Reyes-Perry) [Motion]. The Motion requested that LADWP, the Los Angeles Department of Public Works, Bureau of Sanitation (LABOS), and the Los Angeles Department of Building and Safety (LADBS) identify the amount of groundwater discharged into the storm drain or sanitary sewer system from construction sites and for these departments to report on methods and approaches to convey groundwater from these sites to nearby spreading grounds or other components of the City of Los Angeles' water supply system.

A working group, composed of LADWP, LABOS, and LADBS, was formed to evaluate discharge practices and amounts of water discharged into the storm drain or sanitary sewer system and potential beneficial uses. To facilitate this evaluation, the working group also examined information supplied by the Los Angeles Regional Water Quality Control Board (LARWQCB).

The working group's findings are summarized below:

- The working group reviewed 241 groundwater discharge permits that were issued to various parties from July 1, 2005 to June 30, 2009, and examined in detail a representative sample of these permits. Based on our analysis, 356,000,000 gallons per year were estimated to have been discharged into the storm drain and/or sanitary sewer system.

- The annual water demand for a household is approximately 160,000 gallons. Therefore, 356,000,000 could serve the water supply needs of approximately 2,200 households for one year if treated and introduced into the water distribution system. However, the amount of discharge could be under reported due to lack of follow up and verification. The City of Los Angeles' annual water demand was approximately 199,000,000,000 gallons during the period of July 2008 to June 2009. The estimated discharge of 356,000,000 gallons represents 0.18 percent of the annual water demand.

The dischargers' beneficial use analyses are reviewed by the LARWQCB as part of their permitting process without any communication from the City of Los Angeles. LADWP will be working with LADBS and Los Angeles City Planning Department to establish an early notification process that will inform building applicants of the requirements of the LARWQCB for beneficial use feasibility study. LADWP will continue to work with the LARWQCB to obtain a copy of their review of building applicant's beneficial use feasibility study. Should the LARWQCB's review determine the feasibility of utilizing the discharged groundwater or stormwater for beneficial use outside the building applicant's construction site, LADWP will work with the building applicant to develop a project for beneficial use subject to water quality, quantity, and compliance with federal, state, and local regulations.

This will greatly enhance the building applicant's awareness of the City of Los Angeles' preference for beneficial use of groundwater and/or stormwater during their construction activities. It will also enable LADWP to better document beneficial use activities of building applicants in the City of Los Angeles.

Enclosed are Exhibits A, B, and C which illustrate the existing and proposed permitting processes as well as the approximate locations of the groundwater discharges that have occurred in the City of Los Angeles since July 2005.

If you have any questions or require additional information, please contact me at (213) 367-1338, or have a member of your staff contact Ms. Winifred J. Yancy, Manager, Government and Neighborhood Relations, at (213) 367-0025.

Sincerely,

S. David Freeman
Interim General Manager

VHD:bdc
Enclosures
c/enc: Councilmember Tony Cardenas, Vice-Chair, Energy and Environment (E&E) Committee
Councilmember Richard Alarcon, Member, E&E Committee
Councilmember Paul Koretz, Member, E&E Committee
Councilmember Paul Krekorian, Member, E & E Committee
Ms. Maria Espinoza, Legislative Assistant, E&E Committee
Mr. Miguel A. Santana, City Administrative Officer
Mr. Gerry F. Miller, Chief Legislative Analyst
Mr. Raymond Chan, Interim General Manager LADBS
Ms. Ifa Kashefi, LADBS
Mr. Enrique C. Zaldivar, LABOS
Mr. Brent Lorscheider, LABOS
Mr. Robert Vega, LABOS
Ms. Claire Bowin, City Planning Department
Ms. Winifred J. Yancy

Department of Water and Power the City of Los Angeles

ANTONIO R. VILLARAIGOSA
Mayor

Commission
LEE KANON ALPERT, *President*
EDITH RAMIREZ, *Vice President*
FORESCEE HOGAN-ROWLES
JONATHAN PARFREY
THOMAS S. SAYLES
BARBARA E. MOSCHOS, *Secretary*

H. DAVID NAHAI,
Chief Executive Officer and General Manager

August 21, 2009

The Honorable City Council
Office of the City Clerk
Room 395, City Hall
Mail Stop 160

Attention: Councilmember Jan Perry
Chair, Energy and Environment Committee

Honorable Members:

Subject: Groundwater Discharge – Council File No. 09-1857

This is in response to the Los Angeles City Council Motion No. 09-1857 (Reyes-Perry) requesting the Los Angeles Department of Water and Power (LADWP) to work with the Los Angeles Department of Public Works Bureau of Sanitation (LABOS) and the Los Angeles Department of Building and Safety (LADBS) relative to identifying the amount of groundwater that is discharged to the storm drain system from construction sites; and that the aforementioned Departments report on methods and approaches to convey groundwater from these sites to nearby spreading grounds or other components of the City of Los Angeles (City) water supply system.

LADWP considers the motion as a very appropriate and useful inquiry, but one which needs a little more time to properly investigate and report back to the Energy and Environment Committee. The response needs to be coordinated among at least three City departments that have partial roles in this as-yet uncoordinated area of activities. LADWP is happy to take the lead on this and has already begun to address the issues raised in the motion by establishing a working group composed of staff from LADWP, LADBS, and LABOS. The goal of this working group is to determine the feasibility and potential methods of conveying groundwater from construction sites to nearby spreading grounds and/or other components of the City's water supply, as well as review current practices and policies and, if necessary, develop new protocols to ensure discharged groundwater is put to its highest and best use. We will fully address these issues and report back to the City Council within ninety days.

If you have any questions or if further information is required, please contact me at (213) 367-1338, or have a member of your staff contact Ms. Winifred J. Yancy, Manager, Government and Neighborhood Relations, at (213) 367-0025.

Sincerely,

H. David Nahai
Chief Executive Officer
and General Manager

VHD:bdc
c: Councilmember Eric Garcetti, Vice-Chair, Energy and Environment (E & E) Committee
Councilmember Richard Alarcon, Member, E & E Committee
Councilmember Tony Cardenas, Member, E & E Committee
Ms. Maria Espinoza, Legislative Assistant, E & E Committee
Mr. Miguel A. Santana, City Administrative Officer
Mr. Gerry F. Miller, Chief Legislative Analyst
Mr. Andrew A. Adelman, LADBS
Ms. Ifa Kashefi, LADBS
Mr. Enrique C. Zaldivar, LABOS
Mr. Brent Lorscheider, LABOS
Ms. Winifred J. Yancy

09-1857

JUL 24 2009
ENERGY & ENVIRONMENT

MOTION

The City and region are currently facing extreme drought conditions as a result of declining snowpack levels in the Eastern Sierras and falling water supply levels from the Colorado River. Additionally, litigation to protect the Delta Smelt has significantly reduced the amount of water the City and region receives from Northern California.

These circumstances have caused the City to implement strident water conservation measures that have impacted all residents and commercial entities. For example, water shortage rates have been put in place to increase the cost of water and incentivize greater conservation. Also, the City has implemented an Emergency Water Conservation Ordinance that limits outdoor irrigation to no more than two days per week. These measures, and others like them, are designed to address the City's ongoing problems with an inadequate water supply.

Despite these efforts, there are instances where the City either directly or indirectly allows valuable water to be wasted or mis-used without benefit to the public. Construction projects that require excavation are occasionally granted permits to facilitate the dewatering of large amounts of groundwater. The groundwater from these sites are generally discharged into the City's stormdrain system where it is ultimately conveyed to the ocean.

To provide a specific case, last Fall, a construction project in the City of Los Angeles was permitted to discharge up to 144,000 gallons per day of groundwater into the stormdrain system over the course of several days. It was reported that the water pumps at this site discharged approximately 130,000 gallons per day or approximately 90 gallons per minute. The permit simply required that the discharged water meet water quality standards and that best management practices be employed in the water's conveyance.

It is unclear how much groundwater is discharged from construction sites on an annual basis. The City should identify the amount of groundwater discharged in this manner and develop methods to convey the water to nearby spreading grounds or other components of the City's water supply system for appropriate use. In this manner, the City may be obtain its water conservation objectives and address the extreme drought conditions facing the region.

I THEREFORE MOVE that the Department of Water and Power, in conjunction with the Bureau of Sanitation and Department of Building and Safety, report to the Council in 30 days on identifying the amount of groundwater that is discharged to the stormdrain system from construction sites; and that these Departments report on methods and approaches to convey groundwater from these sites to nearby spreading grounds or other components of the City's water supply system.

PRESENTED BY: _____
ED P. REYES
Councilmember, 1st District

JUL 24 2009

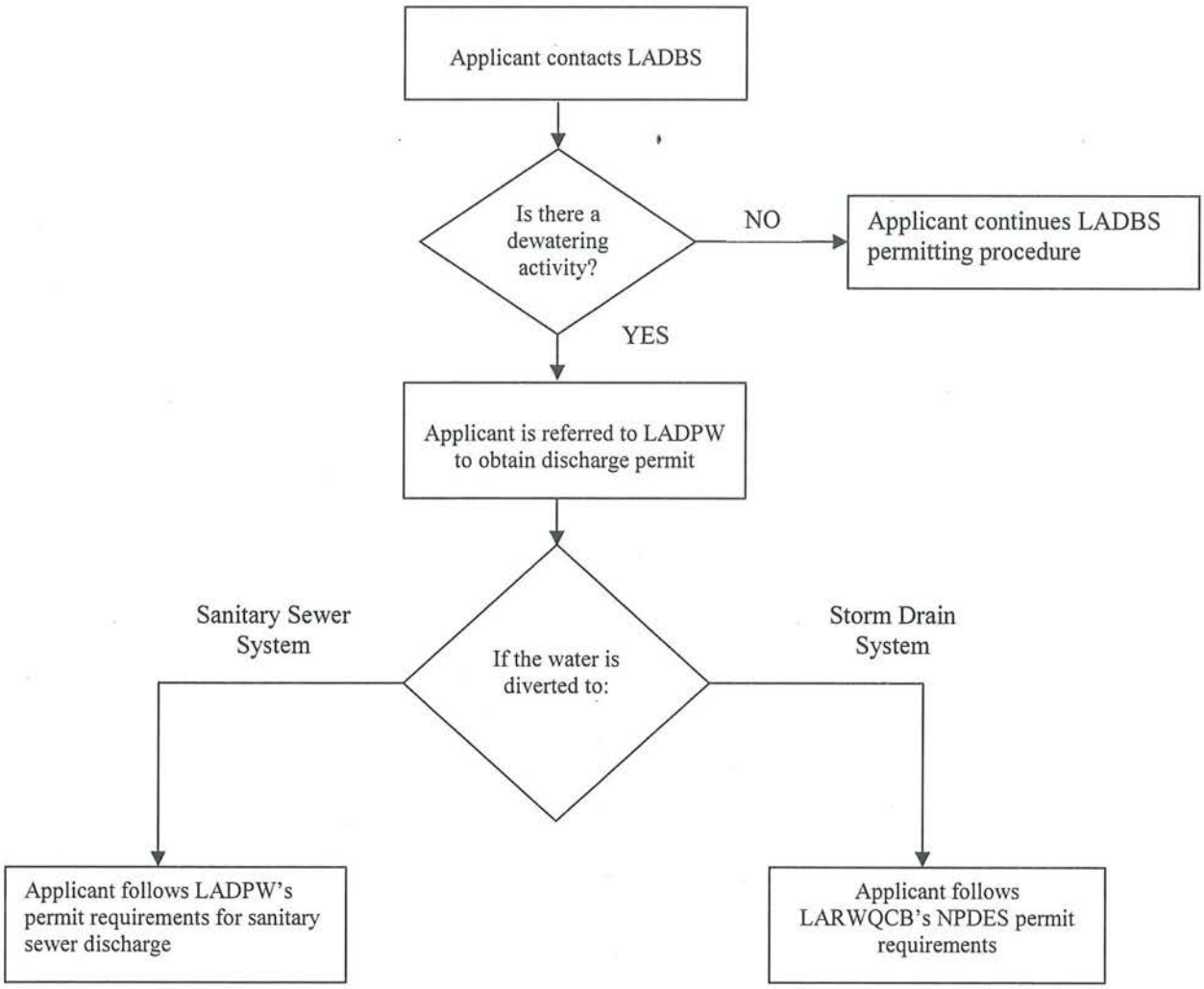
SECONDED BY: _____

ORIGINAL

EG

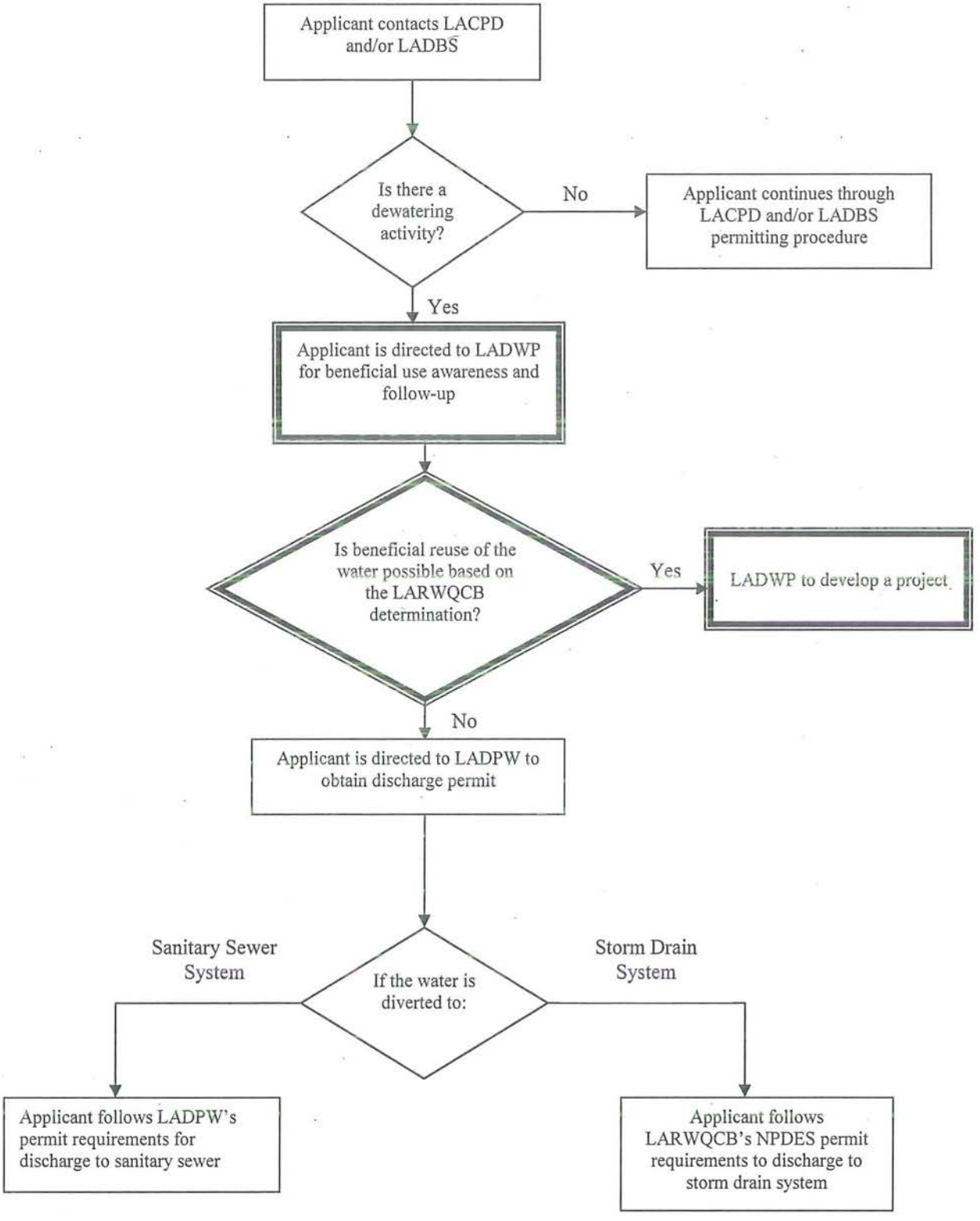
Exhibit A

Existing Dewatering Permitting Process Flow chart



LADWP: Los Angeles Department of Water and Power
LADBS: Los Angeles Department of Building and Safety
LARWQB: Los Angeles Regional Quality Control Board
LADPW: Los Angeles Department of Public Works
NPDES: Los Angeles National Pollutant Discharge Elimination System

Proposed Dewatering Permitting Process Flow Chart



LACPD:	Los Angeles City Planning Department
LADWP:	Los Angeles Department of Water and Power
LADBS:	Los Angeles Department of Building and Safety
LADPW:	Los Angeles Department of Public Works
LARWQCB:	Los Angeles Regional Water Quality Control Board
NPDES:	National Pollutant Discharge Elimination System
═══:	Cases with this border line are the additional suggested steps in the permitting

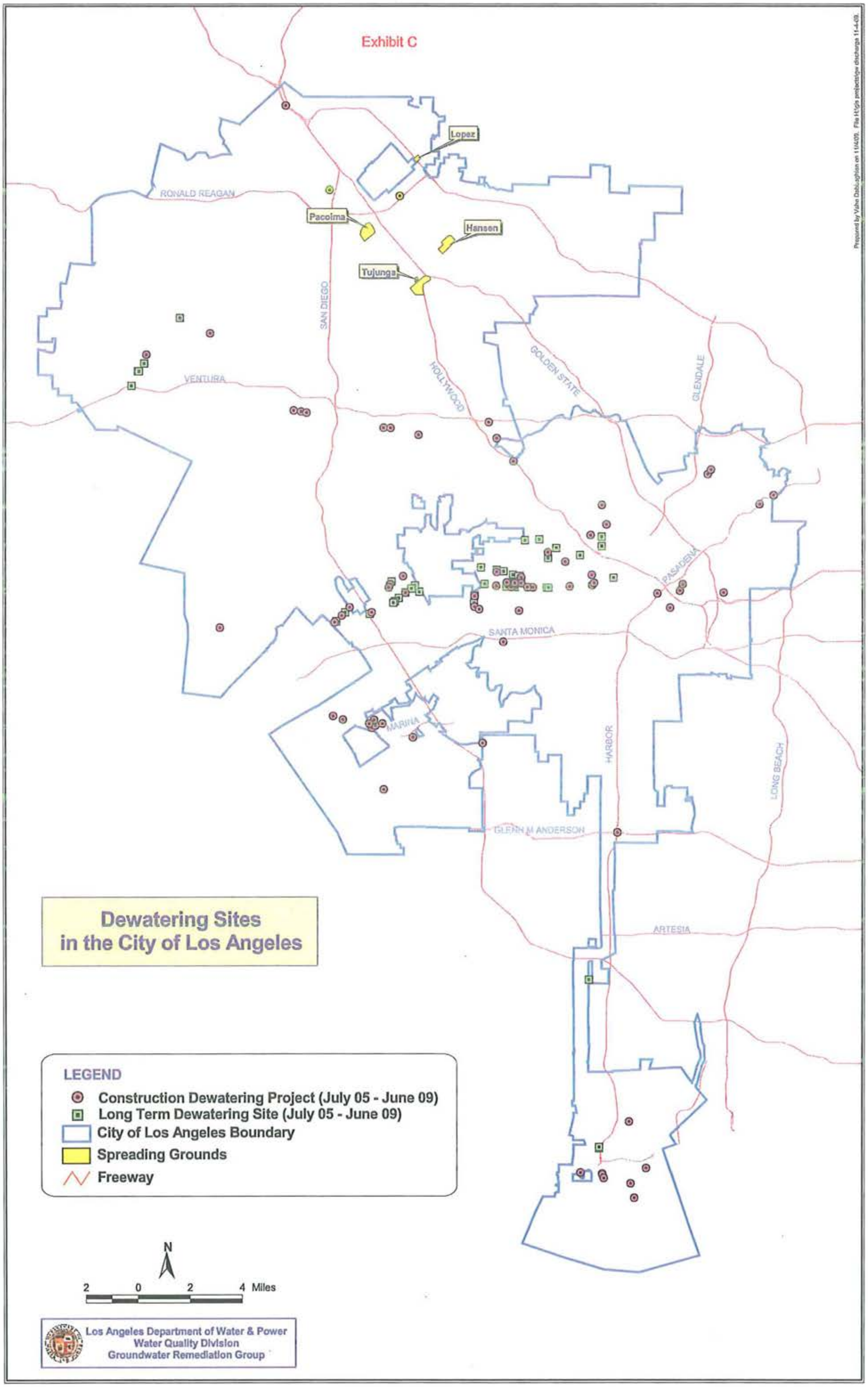


Exhibit C
Prepared by Vaho Dabbaghian on 11/4/09. File H:\gis projects\gw discharge 11-4-09.
Lopez
Pacoima
Hansen
Tujunga
RONALD REAGAN
SAN DIEGO
VENTURA
HOLLYWOOD
GOLDEN STATE
GLENDALE
PASADENA
SANTA MONICA
MARINA
HARBOR
LONG BEACH
GLENN M ANDERSON
ARTESIA
Dewatering Sites
in the City of Los Angeles
LEGEND
Construction Dewatering Project (July 05 - June 09)
Long Term Dewatering Site (July 05 - June 09)
City of Los Angeles Boundary
Spreading Grounds
Freeway
N
2 0 2 4 Miles
Los Angeles Department of Water & Power
Water Quality Division
Groundwater Remediation Group

From:	Adam Lee
To:	WB-RB4-losangeles
Cc:	Jain, Namiraj@Waterboards
Subject:	Comments on tentative NPDES Permit, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, NPDES No. CAG994004
Date:	Thursday, November 9, 2023 4:16:35 PM

EXTERNAL:

Good afternoon,

Los Angeles County Public Works has an ongoing program to perform injection well maintenance (i.e., injection well redevelopment) at all three seawater barrier projects (i.e., Alamitos Barrier, Dominguez Gap Barrier, and West Coast Basin Barrier). From 2003 through 2016, water generated during these maintenance activities was discharged to local storm drains under NPDES General Permit 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.* However, in 2016 LARWQCB moved us over into NPDES General Permit R4-2013-0095 *General National Pollutant Discharge Elimination System and Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.* This permit was superseded in 2018 by General NPDES Permit R4-2018-0125. The biggest issue with being moved over into the different permit has been complying with the Copper and Zinc effluent limitation requirements, which went from 1,000 ppb to 5 ppb for Copper, and from no limit listed to 134 ppb for Zinc.

Since General NPDES Permit R4-2018-0125 is being updated, we would like to take this opportunity to verify whether the seawater barrier project should be considered as a potable water discharger under the General NPDES permit CAG140001.

We would argue that the seawater barrier projects do fall under Statewide General NPDES permit CAG140001 for the following reasons:

- Water source for the seawater barrier projects is a blend of advanced treated recycled water and potable water. The advanced treated recycled water used for injection is regulated by the State Water Board Division of Drinking Water. The other water sources for injection are imported potable water from the Metropolitan Water District.
- The primary purpose of the seawater barriers is to distribute safe drinking water to the subsurface in the underlying aquifers.
- The type of discharge from the seawater barrier project injection well redevelopment is the same as Water supply well development and rehabilitations (found under Groundwater Well Operations in permit CAG140001). The only difference is we are injecting drinking water into the ground, where supply wells pull drinking water out of the ground.
- The seawater barriers historically have fallen under the potable water discharge permit prior

to 2016.

- The seawater barriers collectively have over 300 injection wells, which could be considered as “connections”.

Please review and let us know your thoughts on moving forward. The seawater barriers projects are very unique, with only a handful of similar projects existing in the country. With that in mind it can be difficult where to classify the seawater barrier projects, and that is why we want to ensure we are operating under the correct NPDES Permit.

Thank you

Adam Lee, P.E.
Civil Engineer
Los Angeles County Public Works
626.458.6185
awlee@dpw.lacounty.gov

From:	Katie McCoy
To:	Jain, Namiraj@Waterboards
Subject:	RE: Tentative Waste Discharge Requirements, NPDES permit for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties
Date:	Tuesday, November 7, 2023 9:40:14 AM
Attachments:	image001.png image002.png image003.png

EXTERNAL:

Hi Namiraj,
We are reviewing the Tentative Order No. R4-2023-XXXX for NPDES Permit No. CAG994004 on behalf of Molina Center and have a few questions.

1. Could you confirm the NOI for existing General Permittees is due 90 days of adoption of the 2023 General Permit (p. 8 in the Tentative Order)? Or should it read 90 days of the effective date of the General Permit? An excerpt from the Tentative Order pertaining to this is below.

   b. Existing General Permittees: To continue coverage under this General Permit, dischargers must complete and submit a completed NOI form to the Los Angeles Water Board within 90 days of adoption of this General Permit. Dischargers must

2. The Water Board is proposing to use the mercury effluent limitation of 12 ng/L, as stated below in **No. 9. Mercury Provisions** on p. F-8 of the Fact Sheet in the Tentative Order.

   This General Permit implements the mercury provisions with an effluent limitation of 12 ng/L (nanogram per liter) in the groundwater discharge based on water column concentration criteria for water body type that include **rivers, creeks, streams, estuaries, enclosed bays, and waters with tidal mixing as appropriate and recommended** in Part 2 of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California.

   We see that this value comes from the first column in Table 1 of Section IV.D.2 of the *Part 2 of the Inland Surface Waters, Enclosed Bays, and Estuaries of California* document which is used for implementing water quality objectives. Can you elaborate on how the Water Board determined to use this value, used for determining water quality objectives, as the value for complying with effluent limitations in the Order?

3. The USEPA approved these mercury objectives back in 2017. Why weren't these objectives implemented in the 2018 Permit?

We can discuss this over the phone if it would be easier. Please let me know when would be a good time, or call me at 916-858-2767.

I appreciate your helping us understand this further.
Thank you.
Katie

Katie McCoy, PE/QSD/QISP | Project Manager
2882 Prospect Park Drive, Suite 240
Rancho Cordova, CA 95670
Direct: (916) 858-2767
Teams: KatieMcCoy@KennedyJenks.com

SERVICE | PURPOSE | TRUST KennedyJenks.com

From: Katie McCoy
Sent: Thursday, October 19, 2023 11:38 AM
To: Namiraj Jain - RWQCB - Los Angeles Region (Namiraj.Jain@waterboards.ca.gov) <Namiraj.Jain@waterboards.ca.gov>
Subject: RE: Tentative Waste Discharge Requirements, NPDES permit for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties

Hi Namiraj,
I hope you've been well
I wanted to ask if there is a red-line version of these tentative WDRs to make comparison of this with the 2018 version a little easier. I checked the website and didn't see it there.
Thank you.
Katie

Katie McCoy, PE/QSD/QISP | Project Manager
2882 Prospect Park Drive, Suite 240
Rancho Cordova, CA 95670
Direct: (916) 858-2767
Teams: KatieMcCoy@KennedyJenks.com

SERVICE | PURPOSE | TRUST KennedyJenks.com

From: Jain, Namiraj@Waterboards <Namiraj.Jain@waterboards.ca.gov>
Sent: Thursday, October 12, 2023 7:45 PM
To: Sybil.Shimazu@montage.com; info@elkdevelopment.com; pfischer@tishmanspeyer.com; Mike O'Grady <mogrady@cerritos.us>; bbarr@californianhoa.com; rlutes@douglasemmett.com; peter.cappel@aimco.com; helen.chau@aimco.com; connie.vohden@gmail.com; tjohnson@wrd.org; deveridge@hudsonppi.com; Beckie Delgado <bdelgado@jadeent.com>; Schoellerman, Randy <randy@wqa.com>; Rubin, Katherine <Katherine.Rubin@ladwp.com>; rfraussto@lapuntewater.com; Mark Scheuer <mark.scheuer@ametek.com>; Ramsey, Mary <Mary.Ramsey@molinahealthcare.com>; Garrett.Pender@cushwake.com; jgullixson@shvo.com; acct.pay@unitedwater.org; mauriciog@unitedwater.org; acct.pay@unitedwater.org; mauriciog@unitedwater.org; manderson@lpc; Drue Preissman <drue@ghpalmer.com>; Mike C Phillips <mike.phillips@amwater.com>; lbon@metabolicstudio.org; Joe Killefer <Joe@anejodev.com>; michael.taraszki@woodplc.com; sandy.lin@zgpusa.com; donya29@hotmail.com; oemrique@dwp.lacounty.gov;

oemrique@dwp.lacounty.gov; John Adler <john@faring.com>; mikecohanzad@gmail.com; Joseph Liles <jliles@wrd.org>; shaun.r.frost2@usace.army.mil; dchen@itsc.org; frank@afcodevelopment.com; matt@elkwood.com; kefalast@metro.net; Rubin, Katherine <Katherine.Rubin@ladwp.com>; vlad@beronre.com; george.ker@longbeach.gov; Choneybone@portla.org; Juri Ripinsky <JR@continentaldevelopmentgroup.com>
Cc: Anijielo, Augustine@Waterboards <Augustine.Anijielo@waterboards.ca.gov>; Lim, Jeong-Hee@Waterboards <Jeong-Hee.Lim@waterboards.ca.gov>
Subject: Tentative Waste Discharge Requirements, NPDES permit for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties

Hello,

Please find the attached transmittal letter and the tentative Order, *Waste Discharge Requirements and General National Pollutant Discharge Elimination System Permit for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties*, Order No. R4-2023-XXXX (NPDES No. CAG994004). The tentative Order is scheduled for a Board hearing to be held on December 21, 2023, at 9:00 a.m., at 320 W 4th Street, Carmel Room, Los Angeles, California, 90013. These documents are also available on the Los Angeles Water Board's website at the following location for review: https://www.waterboards.ca.gov/losangeles/board_decisions/tentative_orders/index.html#6

The last day to submit comments is by the close of business on November 13, 2023.

If you have any questions, please contact Namiraj.Jain@waterboards.ca.gov.

Thanks

Namiraj Jain, PE.
Water Resources Control Engineer
Los Angeles Water Quality Control Board
320 W. 4th St. Suite 200
Office: (213) 620-6003

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this email in error, any review, use, disclosure, distribution, or copying of this email is strictly prohibited. Please notify us immediately of the error by return email, and please delete this email from your system. Thank you for your cooperation.

From:	Nalinna Rasu
To:	WB-RB4-losangeles
Cc:	Jain, Namiraj@Waterboards
Subject:	Comments on tentative NPDES Permit, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, NPDES No. CAG994004
Date:	Monday, November 13, 2023 4:12:40 PM
Attachments:	image001.png image002.png

EXTERNAL:

The MDEL and AMEL for copper continues to be significantly lower than the MCL for copper in drinking water. What is the Water Board's justification in having a copper effluent limitation as low as 7 µg/L when the MCL for copper in drinking water is 1,300 µg/L? Treating groundwater to such low levels is not only extremely expensive, but in some instances unfeasible as the technology does not exist for remediating to such low levels. This places unnecessary burden on facilities to treat groundwater to standards far exceeding drinking water standards. In addition, dewatering projects in buildings with subterranean parking levels are not performing active construction improvements and dewatering is merely a consequence of maintaining the structural integrity of the building. These facilities should not be burdened with treating groundwater to standards that are 185 times more stringent than drinking water standards. I would argue that groundwater effluent limits should be similar to drinking water standards if groundwater is considered a potential drinking water source by the Water Board.

Thanks,

Nalinna Rasu, CAC, CDPH, CHMM, LEED AP
Principal, Environmental Compliance

CITADEL EHS
assess • resolve • strengthen

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