

Response to Comments
City of Santa Monica
Sustainable Water Infrastructure Project (SWIP)
Tentative Waste Discharge Requirements and Water Reclamation Requirements

This table describes all significant comments received from interested persons regarding the tentative permit described above. Each comment has a corresponding response and action taken.

Comments received from the City of Santa Monica on January 13, 2021

#	Comment	Response	Action Taken
1	<p>Section 1.2.1, page 3</p> <p>i) Change “1.38 mgd” to “up to 1.5 mgd” to correspond to values given in Section 2 (Table 2-3) of the submitted SWIP Recycled Water Engineering Report dated July 16, 2020.</p> <p>ii) Change “1 mgd” to “up to 1.2 mgd” to correspond to values given in Section 2 (Table 2-25) of the submitted SWIP Recycled Water Engineering Report dated July 16, 2020.</p>	Staff agreed.	Revisions were made to the permit.
2	<p>Section 1.3, page 4.</p> <p>Change “1.0 mgd” to “up to 1.2 mgd” to correspond to values give in Section 2 (Table 2-25) of the submitted SWIP Recycled Water Engineering Report dated July 16, 2020.</p>	Staff agreed.	Revisions were made to the permit.
3	<p>Section 2, Table 3, Page 6</p> <p>Add the following City use sites to Table 3 Tertiary-Treated Recycled Water Users; including the 5 City filling stations included in Section 4 (Table 4-1) of the SWIP Recycled Water Engineering Report dated July 16, 2020, and the additional City-owned irrigation sites listed below:</p>	Staff agreed.	Revisions were made to the permit.

#	Comment					Response	Action Taken
	Recycled Water User	Facility Owner	Use Type	Address	Land Use		
	Median at Olympic Boulevard	City	Irrigation	1000-2400 Olympic Boulevard Median	Public Right-Of-Way		
	I-10 Freeway Landscaping	State/ Caltrans District 07	Irrigation	1702 Santa Monica Freeway	State Right-Of-Way		
	Other/ Filling Station	City	Other/ Filling Station for Street Cleaning, Sewer Jetting	1000 Olympic Boulevard, 1300 Ocean Avenue, 1600 Delaware Avenue, 1600 Main Street, 300 Colorado Avenue	Public Right-Of-Way		
4	<p>Section 3.1, Table 6, Footnote b, page 21.</p> <p>Please change “treated effluent” to “MBR filtrate.”</p> <p>Title 22 CCR § 60301.320 references filtered wastewater requirement. Continuous turbidity monitoring is provided at the MBR filtrate to comply with the requirement. Grab sample turbidity monitoring is provided at EFF-001 in accordance with Table E3 of this Board Order.</p>					<p>The limitations for turbidity are based on the definition of filtered wastewater in Title 22 of the California Code of Regulations and apply to the Membrane Bioreactor (MBR) filtrate. The language in footnote b on page 21 has been revised from “treated</p>	<p>Revisions were made to the permit.</p>

#	Comment	Response	Action Taken
		effluent” to “MBR filtrate.” For consistency and clarity, the language “after MF and prior to RO” has been added to Table 6 on page 21 and Table E3 on page E-7 of the Monitoring and Reporting Program (MRP).	
5	<p>Attachment E, Section 3.3, Table E3, page E-7</p> <p>Type of sample for TSS, BOD, TDS, Sulfate, Chloride, Boron, Total Nitrogen, Nitrate-N + Nitrite-N, Nitrate-N, and Nitrite-N change “24-hour composite” to “24-hour composite or grab”</p> <p>(1) 24-hour composite will be the primary method of sampling, but grab sample is requested to be allowed as an alternative backup in the event of failures with the composite sampler.</p> <p>(2) TSS and BOD sample are particularly requested since these have weekly sampling frequency and the proposed change would allow the City flexibility to comply with the sampling requirements. TSS and BOD are not expected to vary diurnally in the treated effluent due to advanced treatment processes through MBR UF, RO, and UV AOP processes. If TSS or BOD were to vary, continuous online turbidity and TOC analyzers would provide indication of this first.</p>	<p>24-hour composite samples are required for these pollutants because 24-hour composites are more representative of the discharge. Grab samples are more appropriate for pollutants/parameters whose sample properties may be subject to change during storage, including volatile compounds. The referenced pollutants/parameters are relatively stable in solution, so 24-hour composites are more appropriate since they represent the discharge for an entire day. If there are failures with the composite sampler, the Discharger may reset the sampler or collect and composite the samples manually the following day. Since 24-hour composite samples are more appropriate for these pollutants/parameters and</p>	None necessary.

#	Comment	Response	Action Taken
		the Discharger has the flexibility to reset the sampler or collect and composite the samples manually the following day if there are failures, 24-hour composite samples will continue to be required for these pollutants/parameters.	
6	<p>Attachment E, Section 5.2.1, page E-13 Modify “Membrane Integrity Testing” to “Membrane Integrity Monitoring.”</p> <p>The MBR UF system for the SWIP AWTF differs from typical pressurized UF systems where membrane integrity testing is completed through pressure decay testing. The SWIP MBR UF system is a submerged system and its membrane integrity is monitored through continuous turbidity measurements will be seeking tier 1 log removal credits, the UF membrane system is submerged and membrane integrity is monitored through continuous turbidity monitoring. The MBR UF system for the SWIP does not have the capability to perform pressure decay testing.</p>	Staff agreed. The Log Reduction Value (LRV) credits for MBR are based on turbidity monitoring and not membrane integrity testing.	Revisions were made to the permit.
7	<p>Attachment E, Section 5.2.4, page E-13. Delete “Ultraviolet Intensity (UVI)” and “calculated UVI/Q.”</p> <p>We request a modification to the UV AOP monthly reporting in Section 5.2.4 to be consistent with the Phase 2 engineering report by removing UVI and UVI/Q from the monthly report. The draft permit language may have been based on typical UV disinfection requirements in non-potable reuse applications.</p>	The State Water Resources Control Board, Division of Drinking Water (DDW) is currently reviewing the Advanced Oxidation Process (AOP) testing protocol, so the operational parameters have not yet been approved. The reporting requirement has been	Revisions were made to the permit.

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	<p>However, the UV AOP system for the SWIP facility is designed for 0.5 log reduction of 1,4-dioxane, which necessitates higher UV doses than typically needed for disinfection only in order to facilitate advanced oxidation. The UV AOP performance is indicated by the flow, power, NDMA log reduction, UVT, calculated chlorine dose, and reactor failures. In addition, reporting these items are consistent with the reporting requirements for the UV AOP system at the Water Replenishment District of Southern California's Albert Robles Center for Water Recycling and Environmental Learning WRD ARC facility. Please note that UVI and flow (Q) will be monitored by the UV AOP system but not included in the monthly report. This deletion is consistent with the Phase 2 Engineering Report.</p>	<p>modified to indicate that the operational parameters accepted by DDW need to be reported and potential operational parameters are included in parentheses as examples only.</p>	
8	<p>Attachment E, Section 8, page E-18. Modify "90 Days" to "180 Days" to submit the Operations and Maintenance Manual (OMM) from the effective date of the Order. This is consistent with Section 9.1 DDW specifications and requirements of the submitted Board Order. Section 9.1 states OMM to be submitted prior to start of operation and delivery of recycled water.</p>	<p>Staff agreed.</p>	<p>Revisions were made to the permit.</p>