

**RESPONSE TO COMMENTS
CITY OF SIMI VALLEY
SIMI VALLEY WATER QUALITY CONTROL PLANT (WQCP)
TENTATIVE AMENDED WRRs, ORDER NO. 87-46-AYY,
AMENDED BY TENTATIVE ORDER NO. R4-2025-XXXX
FILE NO. 61-60**

Comments from City of Simi Valley dated September 24, 2025

No.	Comment	Response	Action Taken
A1	Discharger Name in Tentative Amended WRRs for Simi Valley WQCP The City of Simi Valley is no longer operating as Simi Valley County Sanitation District, and requests that all references reflect the City of Simi Valley as the responsible entity.	The Los Angeles Water Board agrees with the proposed changes.	Revisions have been made to the Tentative Amended WRRs for the Simi Valley WQCP.
A2	Tentative Amended WRRs for the Simi Valley WQCP, Finding 1; Update facility description The City of Simi Valley Water Quality Control Plant has a current design flow capacity of 12.5 million gallons per day (MGD). The City no longer discharges treated effluent to adjacent properties for irrigation. Additionally, the City no longer disposes of anaerobically digested sludge or separated supernatant by land application for soil amendment purposes.	The Los Angeles Water Board agrees to update the design flow in this section and to remove the discussion on discharging recycled water to adjacent properties and land application of anaerobically digested sludge since these activities no longer occur.	Revisions have been made to the Tentative Amended WRRs for the Simi Valley WQCP.

No.	Comment	Response	Action Taken
A3	Tentative Amended WRRs for the Simi Valley WQCP, Finding 5; Treatment process update City of Simi Valley requests Finding 5 be removed as it is no longer applicable. The City does not utilize these sludge disposal sites.	The Los Angeles Water Board agrees with the proposed changes since the City of Simi Valley no longer applies sludge to land.	Revisions have been made to the Tentative Amended WRRs for the Simi Valley WQCP.
A4	Tentative Amended WRRs, Provisions, Section E.5; Notification clarification The City of Simi Valley requests clarification on the requirement for notification within five days (business or calendar), and respectfully ask: Who is the Manager of the Watershed Regulatory Section to whom such notices should be addressed?	Jeong-Hee Lim is the current Manager of the Watershed Regulatory Section. Her email is jeong-hee.lim@waterboards.ca.gov and her phone number is (213) 576-6616.	None necessary.
A5	Tentative MRP, Section 1.5.; Monitoring requirement methods The City of Simi Valley requests the use of wastewater methods (40 CFR 136) for applicable monitoring requirements.	The Los Angeles Water Board agrees that wastewater methods can be used to monitor disinfected tertiary recycled water since regulations related to recycled water in California Code of Regulations title 17, sections 7583 – 7586, sections 7601 – 7605 (collectively, “17 CCR”), and California Code of Regulations, Title 22, sections 60001 – 60355 22 CCR (collectively, “22 CCR”) do not require use of the drinking water methods in Title 40 of the Code of Federal Regulations, section 141 (40 CFR 141) to monitor disinfected tertiary recycled water for non-potable uses and because the disinfected tertiary recycled water could	Revisions have been made to the Tentative MRP in the Tentative Amended WRRs for all facilities associated with this amendment.

No.	Comment	Response	Action Taken
		cause interference with the drinking water methods. The required methods have been changed from drinking water methods in 40 CFR 141 to wastewater methods in 40 CFR 136.	
A6	Tentative MRP, Section 1.11.; Removal of Bacterial monitoring The City of Simi Valley requests that monitoring for fecal coliform and <i>E. coli</i> be removed.	Section 60301.230 of the California Code of Regulations requires that disinfected tertiary recycled water does not exceed the following total coliform limits: 1. An MPN of 2.2 per 100 milliliters utilizing the bacteriological results of the last seven days for which analyses have been completed; 2. An MPN of 23 per 100 milliliters in more than one sample in any 30-day period; 3. An MPN of 240 total coliform bacteria per 100 milliliters in any sample. Since total coliform results are required to determine compliance with the Title 22 criteria for disinfected tertiary recycled water, total coliform monitoring is required to protect human health. This monitoring helps ensure that recycled water is properly disinfected to prevent exposure to harmful microorganisms in areas where human contact may occur. Monitoring for <i>E. coli</i> and fecal coliform are not required to be monitored in the amended MRP; however, there is a reference to <i>E. coli</i> and fecal	Revisions have been made to the Tentative MRP in the Tentative Amended WRRs for all facilities associated with this amendment.

No.	Comment	Response	Action Taken
		coliform in section 1.11 of the MRP, so those references have been removed for clarity.	
A7	Tentative MRP, Groundwater Monitoring (Section 2.3), Sewage Sludge Monitoring (Section 2.4), Soil Monitoring (Section 2.5), Crop Analysis (Section 2.6), Site Observation (Section 2.7). The City of Simi Valley requests removal of these requirements, as sludge is no longer applied at any site.	The Los Angeles Water Board agrees to the proposed changes since the City of Simi Valley no longer applies sewage sludge to land. Section 2.3 has also been replaced with the following to indicate why groundwater monitoring is not required: <u><i>This Order permits the use of recycled water for non-potable uses. Under section 7.4 of the Recycled Water Policy, groundwater monitoring is not required, provided certain criteria are met and there are no unique site-specific conditions that pose an unacceptable risk to groundwater quality. The Permittee plans to use recycled water for irrigation and is required to apply recycled water at reasonable agronomic rates and shall consider soil, climate, and nutrient demand. Since the Permittee has ceased land application of biosolid and there are no other unique site conditions that present an unacceptable risk to groundwater, the groundwater monitoring requirements have been removed.</i></u> Consistent with this change, the requirements for use of sewage sludge have also been removed in section C and E.14 of the Tentative Amended WRRs for the Simi Valley WQCP and Section 4.4 of the MRP.	Revisions have been made to the Tentative MRP and to the Tentative Amended WRRs for each facility associated with Tentative Order R4-2025-XXXX.

No.	Comment	Response	Action Taken
		Clarification is included in this section for all other WRRs associated with Order No. R4-2025-XXXX to indicate that there are no other unique site-specific conditions that present an acceptable risk to groundwater.	

**RESPONSE TO COMMENTS
LAS VIRGENES MUNICIPAL WATER DISTRICT
TAPIA WATER RECLAMATION FACILITY
TENTATIVE AMENDED WRRs, ORDER NO. 87-86-AYY,
AMENDED BY TENTATIVE ORDER NO. R4-2025-XXXX
FILE NO. 64-104**

B1	Tentative Order R4-2025-XXXX, Finding 12. Understanding that the intent of the Los Angeles Water Board is to enroll producers of recycled water for non-potable reuse under the General Order, making this Tentative Amendment a short-term resolution to compliance with the Recycled Water Policy. Staff request this Order not be adopted by the Los Angeles Water Board in favor of allowing the agencies who are in the process of updating their Title 22 Engineering Reports and Antidegradation Analysis for the purpose of enrolling under the General Order, continue to move forward with those efforts and make necessary monitoring and reporting changes after their enrollment in the General Order is approved. JPA staff submitted a Title 22 Engineering Report and Antidegradation Analysis in November 2022 for review by the Los Angeles Water Board and DDW. Comments were received from the Water Board in April 2024 and in July 2025 from DDW. A response to comments is being prepared for review by DDW.	The Los Angeles Water Board appreciates the Discharger's efforts to update its Title 22 Engineering Report and Antidegradation Analysis and acknowledges the progress made in coordination with the State Water Resources Control Board's Division of Drinking Water (DDW). However, the Los Angeles Water Board must ensure that existing Water Reclamation Requirements, last updated in 1987, are consistent with current regulations and protective of water quality per the Recycled Water Policy. Since Title 22 Engineering Reports take significant time to update, this amendment is intended as an interim step to align the WRRs with the Recycled Water Policy and 22 CCR until enrollment under the General Order is complete. Adoption of this amendment will not delay DDW's ongoing review of JPA's Engineering Report or enrollment in the General Order; rather, it establishes updated requirements to maintain compliance with 22 CCR for the protection of public health during the transition.	None necessary.
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		The Los Angeles Water Board therefore finds adoption of this amendment to be appropriate for the protection of public health.	
B2	Tentative Amended WRRs for the Tapia WRF, Finding 1. There have been several upgrades and treatment system changes to the Tapia Water Reclamation Facility since the WRR was first adopted in 1987. Current design flow is 12 million gallons per day.	The Los Angeles Water Board agrees to update the current plant design flow.	Revision has been made to the Tentative Amended WRRs for the Tapia WRF.
B3	Tentative Amended WRRs for Tapia WRF, Finding 7. Revise the text to be consistent with current Section 13523 language and acknowledge the change from State Department of Public Health to the Division of Drinking Water (DDW).	The Los Angeles Water Board agrees to make the following clarifying changes to this section since DDW now has regulatory authority over public water systems: <i>“Section 13523 of the California Water Code provides that a Regional Board, after consulting with and receiving the recommendations of the State Department of Health Services (now DDW) and any party who has requested in writing to be consulted, and after any necessary hearing, shall, if it determines such action to be necessary to protect the public health, safety, or welfare, prescribe water <u>recycling reclamation</u> requirements for water which is used or proposed to be used as <u>recycled reclaimed</u> water. Section 13523 further provides that such requirements shall include, or be in conformance with, the <u>uniform</u> statewide <u>recycling reclamation</u> criteria.”</i>	Revisions have been made to the Tentative Order No. R4-2025-XXX and the Tentative Amended WRRs for each facility associated with this amendment.

B4	Tentative Amended WRRs for the Tapia WRF, Section A, Recycled Water Limitations. Remove the limit for boron since it is not a listed parameter in the Monitoring and Reporting Program (MRP).	This amendment carries over the existing limitations for boron. The omission of boron from the MRP was a typographical error. Continued monitoring for boron is needed to ensure there is sufficient data to update the Salt and Nutrient Management Plan and antidegradation analyses in the future. Boron has been added to the Tentative amended MRP.	Revision was made to the Tentative MRP in the Tentative Amended WRRs for each facility associated with this amendment.
B5	Tentative Amended WRRs for the Tapia WRF, Section C.4, General Requirements. Revise a typo in the sentence: “moment” should be changed to “movement.”	The Los Angeles Water Board agrees to revise this typographic error.	Revision was made to the Tentative Amended WRRs for each facility associated with the amendment.
B6	Tentative Amended WRRs for the Tapia WRF, Section D.5, Provisions. Change “five days” to “five working days” to match the reporting requirement in the MRP.	The Los Angeles Water Board agrees to revise this section to make it consistent with section 1.4 of the MRP.	Revision was made to Tentative Order No. R4-2025-XXXX and to the Tentative Amended WRRs for each facility associated with the amendment.
B7	Tentative Amended WRRs for the Tapia WRF, Monitoring and Monitoring and Reporting Program, Attachment E, Section 1.2. ELAP certification is valid for one year. Require a copy of the ELAP certificate in the Annual Report only, not with all monitoring reports.	The Los Angeles Water Board agrees to move the requirement to provide ELAP certifications to the annual reporting section (section 4.3.1.f) of the MRP as follows: <i>A list of the analytical methods used for each test and associated laboratory quality assurance/quality control (QA/QC) procedures shall be included <u>in the annual</u></i>	Revision has been made to the Tentative MRP in the Tentative Amended WRRs for each facility associated with this amendment.

		<u>report. The annual report shall identify the laboratories used by the Permittee to monitor compliance with this Order, their status of certification, and provide a summary of their proficiency test and include a copy of laboratory certifications issued by the California State Water Resources Control Board, Division of Drinking Water's (DDW's) Environmental Laboratory Accreditation Program (ELAP).</u> The ELAP reporting requirement has also been removed from the Quarterly Reporting section 4.2.1.h.	
B8	Tentative Amended WRRs for the Tapia WRF, Monitoring and Reporting Program, Attachment E, Section 1.5. Order 87-086 states, "All sampling, sample preservation, and analyses shall be performed in accordance with the latest edition of "Guideline Establishing Test Procedures for Analysis of Pollutants", promulgated by the United States Environmental Protection Agency." Expand this provision to include EPA methods by referencing section 136 of title 40 of the Code of Federal Regulations (40 CFR § 136). This will allow time for agency laboratories to apply for the corresponding test methods in 40 CFR § 141 and receive ELAP certification and will also allow wastewater methodology to be used when appropriate.	See response to comment A5.	Revisions have been made to the Tentative MRP for the Tentative Amended WRRs for each facility associated with this amendment.

B9	Tentative Amended WRRs for the Tapia WRF, Monitoring and Reporting Program, Attachment E, Section 2.2.2, Table E-1. In Table E-1, pH, total coliform, and total chlorine residual (Grab) have daily monitoring frequencies. Only total coliform includes a footnote “samples shall be collected seven days a week unless otherwise specified.” Clarify whether pH and total chlorine residual can be Daily grab samples collected Monday through Friday only, except for holidays. Define the turbidity monitoring location as a point after filtration, prior to disinfection. This compliance location for turbidity is specified in Title 22 section 60301.320.	The Los Angeles Water Board agrees to revise this section to allow for pH and total chlorine residual to be monitored Monday through Friday and excluding holidays; however, total coliform is required to be monitored 7 days a week to evaluate compliance with the 7-day median concentration of total coliform specified in 22 CCR 60301.230. This section has also been revised to clarify that turbidity needs to be monitored continuously at a point after filtration but before disinfection, consistent with 22 CCR.	Revisions have been made to the Tentative MRP for the Tentative Amended WRRs for each facility associated with this amendment.
B10	Tentative Amended WRRs for the Tapia WRF, Monitoring and Reporting Program, Attachment E, Section 5, Table E-5. The Discharger requests that this permit effective date be January 1, 2026, with the first quarterly monitoring report due May 15, 2026.	The Los Angeles Water Board agrees to postpone the effective date of the amendment to ensure a smooth transition to the new requirements. A sentence was added to the Executive Officer declaration indicating the effective date.	Revisions have been made to the Tentative Order R4-2025-XXXX and the Tentative Amended WRRs for each facility associated with this amendment.

**RESPONSE TO COMMENTS
CITY OF VENTURA
VENTURA WATER RECLAMATION FACILITY (WRF)
TENTATIVE AMENDED WRRs, ORDER NO. 87-45-AYY,
AMENDED BY TENTATIVE ORDER NO. R4-2025-XXXX
FILE NO. 57-68**

Comment Email Dated September 25, 2025, from the City of Ventura

No.	Comment	Response	Action Taken
C1	Tentative Amended WRRs for Ventura WRF, Finding 1; Update facility description The City of Ventura requests that the facility description and average flow be updated to reflect current operations, including identifying discharge to the Santa Clara River Estuary (SCRE) and current recycled water users.	The Los Angeles Water Board agrees to update this section to reflect current operations, as follows: <i>The City of San Buenaventura (Permittee) owns and operates the Ventura Water Reclamation Facility, located at 1400 Spinnaker Drive, Ventura, California, with a dry weather design flow capacity of 14 million gallons per day (mgd). The Ventura Water Reclamation Facility currently discharges effluent to the Santa Clara River Estuary under NPDES No. CA0053651 and will begin discharging effluent to the Pacific Ocean by the end of 2025 under a separate Order. A portion of the effluent produced at the Ventura WRF supplies recycled water to the two municipal golf courses, Marina Park, and other industrial landscape areas within the City limits. The annual average treated effluent flow to the Santa Clara River Estuary in 2023 was 6.19 mgd and the annual average</i>	Revisions have been made to the Tentative Amended WRRs for the Ventura WRF.

No.	Comment	Response	Action Taken
		<i>recycled water flow delivered to end users in 2023 was 0.48 mgd.</i>	
C2	Tentative Amended WRRs for Ventura WRF, Finding 2; Update terminology Replace “Santa Clara Tidal Prism” with “Santa Clara River Estuary (SCRE).”	The Los Angeles Water Board agrees to replace “Santa Clara Tidal Prism” with “Santa Clara River Estuary.”	Revisions have been made to the Tentative Amended WRRs for the Ventura WRF.
C3	Tentative Amended WRRs for the Ventura WRF: Finding 3; Treatment process update Update recycled water treatment description to: <i>The VWRF treatment processes consists of primary sedimentation, activated sludge, secondary sedimentation, tertiary filtration, disinfection, dechlorination, and then flows via wildlife ponds to the SCRE. The recycled water flow is diverted after the disinfection treatment process, prior to dechlorination.</i>	The Los Angeles Water Board agrees to update the recycled water treatment description, as proposed.	Revisions have been made to the Tentative Amended WRRs for the Ventura WRF.
C4	Tentative Amended WRRs for Ventura WRF, Section B.2; Add allowable uses Add “Dust control” and “City of Ventura’s Mobile Reuse Recycled Water Program” to approved recycled water uses, noting that the Mobile Reuse Recycled Water Program provides training, permitting, and metered distribution of recycled water to residents for landscape irrigation.	The Los Angeles Water Board agrees to add dust control and the City’s Mobile Reuse Program to Section B.2. to indicate potential uses of recycled water; however, since the Discharger has not received approval from DDW to use the recycled water for these uses, no recycled water may be distributed for these uses until they are approved by DDW (as specified in Section B.2.). Section B.2 has also	Revisions have been made to the Tentative Amended WRRs for the Ventura WRF for the additional uses and to all WRRs associated with

No.	Comment	Response	Action Taken
		been revised to indicate that the uses may be approved through supplemental information submitted to DDW in addition to a revised Engineering Report.	this amendment for the clarification on DDW approval.
C5	Tentative MRP, Item 1.2; Laboratory Certifications and QA/QC The City requests that the language in this section be revised to require ELAP laboratory certifications to be submitted with the annual report or with the nearest quarterly report if revised. The City also requests that summary QC data and chain-of-custody (COC) available upon request instead of included with each monitoring report.	See response to comment B7. The Los Angeles Water Board agrees to move the requirement to provide a copy of ELAP laboratory certifications to the annual reporting section (section 4.3.1.f) of the MRP. However, the Los Angeles Water Board disagrees with revising the QA/QC data summary and chain-of-custody (COC) reporting requirement to be made available upon request from the Los Angeles Water Board without including in the monitoring reports. The QA/QC data summary provides important information to ensure data quality and validation of data, while the chain-of-custody (COC) provides documentation of the integrity of physical samples. The QA/QC data summary and the COC should both be reported, as they provide assurance that the reported data is accurate and reliable.	Revisions have been made to the Tentative MRP for each facility associated with this amendment.
C6	Tentative MRP, Table E-1; Monitoring frequency Align monitoring frequencies (pH, total coliform, total chlorine residual) with pending NPDES permit: Monday–Friday, excluding holidays to assist with weekend laboratory staffing needs.	See response to comment B9. The Los Angeles Water Board agrees to revise this section to allow for pH and total chlorine residual to be monitored Monday through Friday and excluding holidays; however total coliform is required to be monitored 7 days a week to evaluate compliance with the 7-day median concentration of total coliform specified in 22	Revisions have been made to the Tentative MRP for each facility associated with this amendment.

No.	Comment	Response	Action Taken
		CCR 60301.230, thus, no changes made to the total coliform monitoring schedule.	
C7	Tentative Amended MRP, Item 4.1.2; Terminology Revise how the “MDL” acronym is defined from “Minimum Detection Limit” to “Method Detection Limit” to be consistent with USEPA’s definition.	The Los Angeles Water Board agrees to the proposed revision.	Revisions have been made to the Tentative MRP for each facility associated with this amendment.
C8	Tentative Amended MRP, Item 4.3.1.f; ELAP Requirements The City is requesting removal of this section because the requirement is duplicative since the results are submitted to ELAP and an acceptable evaluation is required for each lab to maintain ELAP certification.	The Los Angeles Water Board agrees to revise this section to ensure the ELAP laboratory accreditation certificate is included with the annual report to ensure the laboratories that conduct the analyses are certified for each test method. Since the proficiency testing is submitted to ELAP for accreditation, the requirement to include this in the annual report has been removed. This section has been revised as follows: <i>A list of the analytical methods used for each test and associated laboratory quality assurance/quality control (QA/QC) procedures shall be included <u>in the annual report</u>. The <u>annual report</u> shall identify the laboratories used by the Permittee to monitor compliance with this Order, their status of certification, and provide a summary of their proficiency test <u>and include a copy of laboratory certifications issued by the California State Water Resources Control Board, Division of Drinking</u></i>	Revisions have been made to the Tentative MRPs for each facility associated with this amendment.

No.	Comment	Response	Action Taken
		<u>Water's (DDW's) Environmental Laboratory Accreditation Program (ELAP).</u>	

RESPONSE TO COMMENTS
LOS ANGELES COUNTY SANITATION DISTRICTS
LONG BEACH, SAN JOSE CREEK, SAUGUS, AND VALENCIA WRP
TENTATIVE AMENDED WRRS, ORDER NOS. 87-47-AYY, 87-48-AYY, 87-49-AYY, and 87-50-AYY AMENDED BY
TENTATIVE ORDER NO. R4-2025-XXXX
FILE NO. 69-80, 77-50, 61-30, 65-86

Comment Email Dated September 25, 2025, from the Los Angeles County Sanitation Districts (Sanitation Districts)

No.	Comment	Response	Action Taken
D1	Tentative Amended WRRs and Tentative MRPs; Update Permittee Name The Permittee name should be revised from "County Sanitation Districts of Los Angeles County" to "The Joint Outfall System" for the San Jose Creek WRP and Long Beach WRP, and "Santa Clarita Valley Sanitation District" for Saugus WRP and Valencia WRP throughout the WRRs, including the WRRs title, Finding 1 of the WRRs, the top of each page in the WRRs and Attachment E, and in the "IT IS HEREBY ORDERED" paragraph on page 2. This revision of the Order is needed to update the permittee as the Joint Outfall System for Long Beach WRP and San Jose Creek WRP. In 2005, the two Los Angeles County Sanitation Districts (No. 26 and 32) that	The Los Angeles Water Board agrees to revise the Permittee name from "County Sanitation Districts of Los Angeles County" to "The Joint Outfall System" for the Long Beach WRP and San Jose Creek WRP, and to the "Santa Clarita Valley Sanitation District" for the Valencia WRP and Saugus WRP throughout the Amended WRRs and MRP.	Revisions have been made to the Tentative Amended WRRs and Tentative MRP for Long Beach WRP San Jose Creek WRP, Saugus WRP, and Valencia WRP.

No.	Comment	Response	Action Taken
	initially served Valencia and Saugus WRP were consolidated into one district, named the Santa Clarita Valley Sanitation District for increased administrative efficiency. This revision of the Order is needed to update the permittee as the Santa Clarita Valley Sanitation District.		
D2	All Tentative Amended WRRs; Effective Date The Sanitation Districts request the Effective Date be January 1, 2026, to allow a clean transition for reporting, set-up of GeoTracker formats, implementation of new monitoring parameters, and coordination with purveyors.	See response to comment B10.	Revisions have been made to Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for all facilities associated with this amendment.
D3	All Tentative Amended WRRs; Include Attachments Please include Attachments A-D. MRP is included as Attachment E, but Attachments A-D were not provided.	There are no additional attachments besides Attachment E. For clarity, "Attachment E" has been renamed "Attachment A."	Revisions have been made to Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for all facilities associated with the amendment.
D4	Tentative Amended WRRs for Long Beach WRP, A.5; San Jose Creek WRP, A.5; Saugus WRP, A.5; and Valencia WRP, Section A.5; Revise radioactivity limits reference Update the Title 22 reference for radioactivity limits from §64441 to §64442.	In accordance with the Recycled Water Policy and the General Order, WQ-2016-0068-DDW, the Los Angeles Water Board reconsidered the narrative recycled water limitation for radioactivity included in the Tentative Amended WRRs for each facility, Section A.5, and removed this narrative effluent limit.	Revisions have been made to the Tentative Amended WRRs for all facilities associated with this amendment.

No.	Comment	Response	Action Taken
	Correct reference to Title 22 radioactivity limits are needed: Title 22 §64441 does not reference radioactivity limits, but Title 22 §64442 and §64443 do include radioactivity limits.	Tentative Order No. R4-2025-XXXX was revised accordingly.	
D5	Tentative Amended WRRs, Section B.2.a, B.6, D.3, D.5, D.12, E.13. The Permittee’s designee should also be allowed to submit notifications, reports, and as-built drawings to the Los Angeles Water Board and DDW and maintain User Agreements.	The Los Angeles Water Board agrees to revise these sections to allow for the Permittee’s designee to submit these documents to the Los Angeles Water Board or DDW.	Revisions have been made to Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for all facilities associated with this amendment.
D6	Tentative Order No. R4-2025-XXXX, Item No. 7, Section B.8; Use Area Requirements – Incidental Runoff This section currently prohibits any recycled water surface flow from use areas unless authorized under an NPDES permit, WDRs, or a waiver of WDRs. This is more restrictive than the original WRRs and Title 22 requirements, which allow incidental runoff confined to use areas if they do not pose a public health threat. The Sanitation Districts request the following revision to align with 22 CCR §60310(e)(1), clarifying that minor incidental runoff is not a violation when authorized by the regulatory agency:	The Los Angeles Water Board agrees to revise the language to be consistent with Title 22 as follows: “Recycled water shall not be allowed to escape from the use area(s) as surface flow that would either pond and/or enter surface waters, unless <u>the runoff does not pose a public health threat and is authorized by the regulatory agency through</u> an NPDES permit, Waste Discharge Requirements (WDRs), or a waiver of WDRs.	Revisions have been made to the Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for all facilities associated with the amendment.

No.	Comment	Response	Action Taken
	<i>Recycled water shall not be allowed to escape from the use area(s) as surface flow that would either pond and/or enter surface waters, unless <u>the runoff does not pose a public health threat and is authorized by the regulatory agency, authorized by an NPDES permit, waste discharge requirements (WDRs), or a waiver of WDRs.</u></i>		
D7	Tentative Order No. R4-2025-XXXX, Item No. 10, Section C.12 (Section D.12 in Order No. 87-46); Off-Spec Water and Bypass Flows This section requires that water not meeting disinfected tertiary standards be returned to headworks or discharged under an NPDES permit. The Sanitation Districts request this condition be expanded to also allow bypass of flows to downstream treatment plants during operational challenges and to clarify that disinfected secondary-2.2 and secondary-23 recycled water may be used for Title 22-approved applications without constituting a violation of the Order.	The Los Angeles Water Board agrees to make the following revision to this section to allow the Discharger to divert flows to downstream treatment plants since the off-spec water will undergo additional treatment at the downstream treatment plant before discharge: <i><u>“Water that does not meet disinfected tertiary recycled water requirements in accordance with 22 CCR (i.e. off-spec water) shall either be returned to the headworks for treatment or, <u>discharged to surface water in compliance with an NPDES permit, or conveyed via the sanitary sewer system to downstream treatment plants that have the capacity to receive such flows during operational challenges.</u></u></i> However, since the Discharger does not identify using off-spec water for uses identified in Title 22 for secondary-2.2 and secondary-23 recycled water in their contingency plans in	Revisions have been made to the Amended WRRs for the San Jose Creek WRP, Long Beach WRP, Saugus WRP, and Valencia WRP.

No.	Comment	Response	Action Taken
		the Engineering Report approved by DDW, the Los Angeles Water Board does not agree with adding this additional use in the permits for off-spec water. If the Discharger desires to pursue using off-spec water for secondary-2.2 and secondary-23 uses, the Discharger must submit a revised Engineering Report to DDW for approval.	
D8	Tentative Order No. R4-2025-XXXX, Item 11, Section D.3 (Section E.3 in Order 87-46); Engineering Report Recommend revising this section as follows, <i>“The engineering report shall follow DDW’s Guidelines for the Preparation of an Engineering Report for the Production, Distribution and Use of Recycled Water and also be consistent with the <u>2025 California Plumbing Code</u> American Water Works Association’s (AWWA’s) Guidelines for the Distribution of Non-Potable Water.”</i> The AWWA Guidelines for the Distribution of Non-Potable Water was published in 1992, over thirty years ago, making certain sections outdated. Additionally, certain provisions of the AWWA’s Guidelines for the Distribution of Non-Potable Water conflict with the 2025 edition of the California Plumbing Code. Therefore, this requirement should be consistent with state regulations.	The Los Angeles Water Board agrees to update this section to reference the 2025 California Plumbing Code while retaining reference to the AWWA guidelines since some requirements may still apply. The Los Angeles Water Board agrees to revise this section as follows: <i>“...The engineering report shall follow DDW’s Guidelines for the Preparation of an Engineering Report for the Production, Distribution and Use of Recycled Water and also be consistent with the <u>California Plumbing Code and the American Water Works Association’s (AWWA’s) Guidelines for the Distribution of Non-Potable Water. <u>If there is any conflict between any of these documents, the more stringent requirement shall apply....</u>”</u></i>	Revisions have been made to the Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for all facilities associated with the amendment.

No.	Comment	Response	Action Taken
D9	Tentative Order No. R4-2025-XXXX, Item No. 12, Section D.5 (Section E.5 in Order No. 87-46); Reporting Requirements Recommend revising this section as follows: "...Any such information shall be provided verbally <u>or electronically</u> to the Manager of the Watershed Regulatory Section within 24 hours from the time the Permittee becomes aware of the circumstances. A written submission shall also be provided within five <u>working</u> days of the time the Permittee becomes aware of the circumstances... The following occurrence(s) shall also be reported to the Manager of the Watershed Regulatory Section within 24 hours <u>when they cause the recycled water limitations of this order to be exceeded (CWC sections 13263 and 13267)</u>: a. Any bypass from any portion of the treatment facility; b. Any discharge of treated or untreated wastewater resulting from sewer line breaks, obstruction, surcharge or any other circumstances; and c. Any treatment plant upset which causes the recycled water limitation of this order to be exceeded (CWC sections 13263 and 13267)."	The Los Angeles Water Board agrees to update the reporting requirements to allow the Discharger to report any noncompliance that may endanger human health or the environment verbally or electronically to the Manager of the Watershed Regulatory Section to be consistent with section 1.4 of the MRP. In addition, the requirement to submit written notification has also been updated to five working days to be consistent with section 1.4 of the MRP. However, the Los Angeles Water Board does not agree to limit notification to instances where recycled water limitations have been exceeded because that would limit the Los Angeles Water Board's ability to respond to issues related to the treatment and maintenance of the facility and its collection/distribution system. In the event of a bypass or unpermitted discharges of treated/untreated recycled water, timely notification to the Los Angeles Water Board is essential to ensure appropriate oversight and protection of public health.	Revisions have been made to Tentative Order No. R4-2025-XXXXX, the Tentative Amended WRRs for all facilities associated with this amendment, and the Tentative MRP.

No.	Comment	Response	Action Taken
	The requested revision will provide consistency with the notification requirements specified in Section 1.4 of the MRP and will allow for extra notification time for weekends and holidays. Additionally, the added clarification of when bypasses and sewer lines breaks are to be reported will limit the number of unnecessary notifications to the Los Angeles Water Board, including bypasses for routine maintenance.		
D10	Tentative Order No. R4-2025-XXXX, Item No. 13, Section D.6 (Section E.6 in Order no. 87-46); Clarify Coliform Reporting Trigger Recommend revising this section as follows: the Permittee shall notify the Los Angeles Water Board and DDW <i>“immediately of any confirmed coliform counts that exceed the limitations could cause a violation to the requirements of this Order.”</i>	The Los Angeles Water Board agrees to revise this section to clarify the requirement. Since the Order does not explicitly state the total coliform limitations, this section has been revised as follows: <i>“immediately of any confirmed coliform counts that <u>may cause the recycled water to not meet the definition of disinfected tertiary recycled water in 22 CCR section 60301.230</u> could cause a violation to the requirements of this Order.”</i>	Revisions have been made to Tentative Order No. R4-2025-XXXX and in all Tentative Amended WRRs associated with this amendment.
D11	Tentative Order No. R4-2025-XXXX, Item No. 14, Section D.10 (Section D11 in Order No. 87-47 and Section E.10 in Order No. 87-46); Operator Certifications Recommend revising this section as follows:	The Los Angeles Water Board agrees to revise this section to be consistent with 23 CCR 3680.	Revisions have been made to Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for all facilities

No.	Comment	Response	Action Taken
	<i>“Supervisors and Operators of this publicly owned wastewater treatment plant shall possess a certificate of appropriate grade in accordance with 23 CCR 3680.”</i> 23 CCR 3680 specifically applies to operators, including chief plant operators and designated operators-in-charge, not “supervisors”. Furthermore, “supervisors” as defined in the General Order and as used in WRR Use Area Requirement Section E.12 of this Order differs from how it is used in WRR Section D.10.		associated with the amendment.
D12	Tentative Order No. R4-2025-XXXX, Item No. 15; Expansion of Use Areas This section requires engineering reports and multiple agency approvals prior to serving new use sites. The Discharger notes this language could be interpreted as applying to every new site, regardless of size or location, which could unnecessarily delay connections and conflict with Recycled Water Policy goals. The Discharger requests clarification that the requirement applies to “new use areas” rather than “new use sites,” consistent with the Water Board’s intent.	The Los Angeles Water Board agrees to use the term “Use Areas” in place of “Use Sites” for Item No. 15 in Order No. R4-2025-XXXX, Section D.12 (Section E.12 in Order No. 87-46).	Revisions have been made to the Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for all facilities associated with the amendment.
D13	Tentative Order No. R4-2025-XXXX, Item No. 20, Section E (Section F in Order No. 87-46); Definition of “Use Area”	Title 22 defines a “use area” as “an area of recycled water use with defined boundaries.” The Los Angeles Water Board disagrees with modifying the definition of a Use Area since	Revisions have been made to the Tentative Order No. R4-2025-XXXX and

No.	Comment	Response	Action Taken
	Recommend revising this section as follows: <i>“A “Use Area” is a <u>geographical</u> an area of recycled water use with defined boundaries...”</i> Per discussions with Los Angeles Water Board staff, it is our understanding that a “Use Area” in the WRRs is intended to define a geographic area of recycled water use and not a specific use site. Revising this definition in the Order will clarify this.	the current definition is consistent with 22 CCR section 60301.920; however, to provide additional clarity to the definition, this section has been revised as follows: “A “Use Area” is an area of recycled water use with defined boundaries, which may contain one or more facilities (<u>Use Sites</u>) where recycled water is used...”	the Tentative Amended WRRs for all facilities associated with the amendment.
D14	Tentative Order No. R4-2025-XXXX, Item 20, Section E.2 (Section F.2. in Order No. 87-46); Impoundment Setbacks This section prohibits impoundments of disinfected tertiary recycled water within 100 feet of domestic wells, potable water reservoirs, or streams used as sources of water supply. The Discharger notes this is more stringent than required in 22 CCR §60310(b), which only restricts impoundments near domestic wells. The Discharger requests that this section be revised to match existing regulatory requirements.	The Los Angeles Water Board agrees to revise the language in this requirement to be consistent with Title 22. 22 CCR §60310(b) establishes a 100-foot setback only for domestic water supply wells.	Revisions have been made to the Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for all facilities associated with the amendment.
D15	Tentative Order No. R4-2025-XXXX, Item No. 20, Section E.3.c (Section F.3.c. in Order No. 87-46); Drinking Water Fountain Protection This section requires fountains to be equipped with hoods or covers, a more	The Los Angeles Water Board agrees to revise this section to be consistent with 22 CCR Section 60310(e)(3), which states: “Drinking water fountains shall be protected against contact with recycled water spray, mist, or runoff.”	Revisions have been made to the Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for

No.	Comment	Response	Action Taken
	stringent requirement than 22 CCR §60310(e)(3). The Sanitation Districts request revision to maintain consistency with approved regulations, which mandate protection against recycled water spray, mist, or runoff but do not require drinking water fountains to be equipped with hood or covers.		all facilities associated with the amendment.
D16	Tentative Order No. R4-2025-XXXX, Item 20, Section E.4 (Section F.4. in Order No. 87-46); Alternative Signage Recommend revising this section as follows: “...Each sign shall display an international symbol similar to that shown in figure 60310-A of 22 CCR §60310. <u>DDW may accept alternative signage and wording, or an educational program, provided the applicant demonstrates to DDW that the alternative approach will assure an equivalent degree of public notification.</u>” The requested revision will provide consistency with the regulations.	The Los Angeles Water Board agrees that this revision is appropriate to be consistent with 22 CCR.	Revisions have been made to Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for all facilities associated with the amendment.
D17	Tentative Amended WRRs for Long Beach WRP, Section E.6; San Jose Creek, E.6; Saugus WRP, E.6; and Valencia WRP E.6; Consistency with 22 CCR Use Area Requirement Recommend correcting this section to be consistent with the Tentative Amendment	The Los Angeles Water Board agrees to make the suggested revision to align with 22 CCR §60310(i).	Revisions have been made to Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for all facilities

No.	Comment	Response	Action Taken
	and 22 CCR §60310(i), as follows: <u>“Except for use in a cemetery that complies with the requirements of section 8118 of the Health and Safety Code, t</u>t<u>The portions of the recycled water piping system that are in areas subject to access by the general public shall not include any hose bibs...”</u>. This use area requirement in the Tentative Amended Order differs from what is included in the Tentative Amendment.		associated with this amendment.
D18	Tentative Order No. R4-2025-XXXX, Item No. 20, Section E.13 (section F.13 in Order No. 87-46); User Agreements Recommend revising this section as follows: <u>“The Permittee or its designee shall maintain User Agreements and Ordinances with the potential agricultural, industrial, and recreational users of recycled water. Copies of existing User Agreements and Ordinances shall be provided to the Los Angeles Water Board and DDW upon request.”</u> As described above, the Sanitation Districts maintain agreements with the recycled water purveyors and not the individual users. Additionally, the purveyors have hundreds of User Agreements for each use site served from the WRPs, and the Los Angeles Water Board and DDW may not necessarily need	The Los Angeles Water Board agrees to make this revision to clarify that the Sanitation Districts maintain agreements with recycled water purveyors and to ensure that User Agreements and Ordinances will remain available for review by the Los Angeles Water Board and DDW upon request.	Revisions have been made to Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for all facilities associated with the amendment.

No.	Comment	Response	Action Taken
	or desire to review each individual agreement.		
D19	Tentative Order No. R4-2025-XXXX, Item No. 20, Section E.14 (section F.14 in Order No. 87-46); Cross-Connection Control – Pipelines Near Homes This section requires buffer zones, barriers, or relocation of recycled water laterals near homeowner property lines, along with public outreach. The Sanitation Districts request clarification of the regulatory basis for this requirement, noting no corresponding provisions in 22 CCR, the 2025 Cross-Connection Control Policy Handbook, the Recycled Water Policy, or the California Plumbing Code.	The Los Angeles Water Board agrees to remove this language since it is not specified in Title 22.	Revisions have been made to Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for all facilities associated with the amendment.
D20	Tentative Order No. R4-2025-XXXX, Item No. 20, Section E.16 (section F.16 in Order No. 87-46); Set Separation for New Installations Recommend revising this section as follows: “...<i>provided between recycled water lines and domestic potable water lines. <u>This condition applies to all new installations.</u></i>” It will be impractical to inspect and retrofit all recycled water pipelines and valves within the distribution system.	The Los Angeles Water Board agrees to revise this section as proposed for clarification.	Revisions have been made to Tentative Order No. R4-2025-XXXX and the Tentative Amended WRRs for all facilities associated with the amendment.
D21	Tentative MRP, Section 1.3; Sampling Protocols	The Los Angeles Water Board acknowledges that the Discharger does not purge lines for	Revisions have been made to all Tentative

No.	Comment	Response	Action Taken
	Recommend revising this section as follows: <i>“The Permittee shall have written sampling protocols in place. The sampling protocols shall also include the procedures for handling, storing, testing, and disposing of purge and decontamination waters generated from the sampling events.”</i> The Sanitation Districts do not purge lines for sample collection or generate decontamination water.	sample collection or generate decontamination waters. However, to maintain consistency across permits and ensure protective practices where applicable, the requirement for sampling protocols addressing purge and decontamination waters will remain, but with a minor clarification that this requirement applies only where applicable.	MRPs associated with this amendment.
D22	Tentative MRP, Section 1.5; Methods in Tentative Amended MRP The Discharger requests that the Tentative Amended MRP, Section 1.5, be revised to allow use of either 40 CFR §136 or §141 analytical methods, instead of requiring only §141 drinking water methods.	See response to comment A5.	Revisions have been made to the Tentative MRP in the Tentative Amended WRRs for all facilities associated with this amendment.
D23	Tentative MRP, Section 1.10; Waste Discharge Requirements Recommend revising this section as follows: <i>“Each monitoring report shall include a separate section titled “Summary of Noncompliance” which discusses the compliance record and corrective actions taken or planned that may be needed to bring the discharge into full compliance with waste discharge <u>water reclamation</u> requirements. This section shall clearly list</i>	The Los Angeles Water Board agrees with this revision, clarifying that this section pertains to water reclamation requirements.	Revisions have been made in all Tentative MRPs associated with this amendment.

No.	Comment	Response	Action Taken
	<i>all noncompliance with <u>discharge water reclamation</u> requirements as well as all excursions of the recycled water limitations.”</i> The Tentative Amendment includes water reclamation requirements and not waste discharge requirements. These edits will clarify that difference.		
D24	Tentative MRP, Table E-1; Units for Volume Reporting This table lists the required reporting units for recycled water volume to each end user as million gallons. Recommend revising these units to gallons. The users within the use areas covered by these Orders do not use more than a million gallons of recycled water in a day. The requested revision would provide recycled water usage at a more useful scale.	The Los Angeles Water Board acknowledges that some users do not use more than a million gallons of recycled water per day, therefore it would be more useful to require the units to be reported in gallons per day. The required units for reporting recycled water volume delivered to each end user has been revised to gallons.	Revisions have been made to all Tentative MRPs associated with this amendment.
D25	Tentative MRP, Section 2.2.2, Table E-1; Continuous Flow Monitoring Requirements The Discharger requests removal of the requirement for continuous flow monitoring for each recycled water end user.	The purpose of the flow monitoring requirement for each end user is to track the amount of recycled water being used for each end use. However, since this requirement is based on the volumetric reporting requirements in State Water Resources Control Board Order WQ 2019-0037-EXEC, reporting only volumes of recycled water delivered to each end user is necessary. The	Revisions have been made to Table E-1 of the Tentative MRP in the Tentative Amended WRRs for all facilities associated with this amendment.

No.	Comment	Response	Action Taken
		Los Angeles Water Board therefore agrees to remove the requirement in Table E-1 for continuous monitoring of recycled water flow to each end user.	
D26	Tentative MRP, Section 2.2.2, Table E-1; Total Coliform Reporting Units The Discharger requests that total coliform results be allowed to be reported as either CFU/100 mL (using membrane filtration) or MPN/100 mL (using multiple tube fermentation). The Discharger notes that they have historically used membrane filtration, which provides results up to 24 hours sooner, allowing operators to take corrective action more quickly. The Discharger adds that membrane filtration is more precise for disinfected tertiary-treated effluent. Requiring MPN results alone could delay detection of problems and reduce operational effectiveness.	The Los Angeles Water Board agrees that both membrane filtration (CFU/100 mL) and multiple tube fermentation (MPN/100 mL) are approved methods for total coliform analysis under 40 CFR §136. Consistent with federal regulations, the Tentative MRP has been revised to allow reporting of results using either method, and the following footnote has been revised in Table E-1 to clarify the relationship between the two units: <i>Samples shall be collected seven days a week unless otherwise specified. <u>The results for total coliform in CFU/100mL (membrane filtration method) and MPN/100 mL (multiple tube fermentation method) shall be considered functionally equivalent in terms of compliance with 22 CCR 60301.230(b).</u></i>	Revisions have been made to the Tentative MRP in the Tentative Amended WRRs for all facilities associated with this amendment.
D27	Tentative MRP, Section 2.5; Pond Monitoring This section states: <i>“In some cases, recycled water storage ponds may be used to store recycled water when it is not needed. These monitoring requirements apply only to ponds permitted through this Order...”</i> The Sanitation Districts request clarification as to if these monitoring	These monitoring requirements are intended to apply specifically to recycled water storage ponds permitted through this Order, and not to decorative or landscape ponds that are not used for recycled water storage. The monitoring requirement is meant to ensure recycled water from the storage ponds does not flow over the side of the pond and into a receiving water.	Revisions have been made to all Tentative MRPs in the Tentative Amended WRRs for all facilities associated with this amendment.

No.	Comment	Response	Action Taken
	requirements apply to only “storage ponds” and not landscape or decorative ponds, which are not used for recycled water storage as defined. Additionally, we request clarification as to the basis of these monitoring requirements. Clarification as to where this monitoring applies will help ensure consistent interpretation and compliance. Additionally, clarification as to the regulatory basis for the monitoring requirements, including the freeboard measurement to the nearest 0.1 foot, would assist in understanding the need for this requirement as this level of precision will be impractical for most impoundments.	The Los Angeles Water Board agrees to revise this section as follows for clarity: <i>“In some cases, recycled water storage ponds may be used to store recycled water when it is not needed. These monitoring requirements apply only to <u>storage ponds permitted through this Order. Storage Ponds covered by an existing waste discharge requirements (WDRs) and/or an NPDES order shall continue to be monitored in accordance with that order. Storage Pond(s) containing recycled water shall be monitored for the following:</u>”</i> Consistent with this change, the title of table E-3 has been revised from “Pond System Monitoring” to “<u>Storage Pond System Monitoring.</u>” In response to your comment regarding the freeboard measurement of 0.1 foot, please note that this requirement is derived from WQ-2016-0068-DDW. This Order implements the freeboard measurement to the nearest 0.1 foot to ensure the safety and structural integrity of impoundments. Such precision facilitates the prevention of overflow and ensures that recycled water from the storage ponds does not flow over the side of the pond and into a receiving water.	
D28	Tentative MRP, Section 2.6; Dual-Plumbed Monitoring	The Discharger references 22 CCR §§60313 through 60315; however, 60316 is also relevant here since this section applies to the	Revisions have been made to all Tentative MRPs in the

No.	Comment	Response	Action Taken
	Recommend revising as follows: <i>“For dual-plumbed systems, DDW and/or its delegated local agency shall be consulted for additional reporting, design, and operation requirements, in accordance with the requirements of 22 CCR §§60313 through 60315. The potential for cross-connections and backflow prevention devices shall be monitored as listed below, or more frequently if specified by DDW in 22 CCR.”</i> These edits would directly align the monitoring requirements in the Tentative Amended MRP with established regulatory requirements.	operation of a dual-plumbed system. The Los Angeles Water Board agrees to revise this section to reference 22 CCR §§60313 through 60316 to align with established reporting, design, and operation regulatory requirements for dual-plumbed systems. However, the Los Angeles Water Board does not agree with the proposed deletion of the phrase “if specified by DDW.” DDW retains the authority to require additional monitoring on a case-by-case basis, and this language is necessary to provide sufficient flexibility for oversight and consistency with DDW’s delegated authority.	Tentative Amended WRRs for all facilities associated with this amendment.
D29	Tentative MRP, Section 4.2.1.g; QA/QC Submittal Upon Request This section specifies that <i>“QA/QC documents shall be submitted with each quarterly report...”</i> The Sanitation Districts request that the requirement for submittal of QA/QC documents be upon request, consistent with Section 1.8 of the MRP, which states <i>“...The Permittee shall retain the QA/QC documentation in its files for three years and make available for inspection and/or submit them when requested by the Los Angeles Water Board or DDW...”</i> and that this quarterly submittal requirement be deleted.	See response to comment C5.	None necessary.

No.	Comment	Response	Action Taken
	The requested revision to submit QA/QC documents upon request of the Los Angeles Water Board or DDW instead of quarterly will minimize unnecessary submittals, as QA/QC documentation for all samples is extensive.		
D30	Tentative MRP, Section 4.3.1.h [sic]; ELAP Certifications This section specifies that <i>“The name(s) of the laboratory that conducted the analyses and a copy of laboratory certifications from DDW’s ELAP”</i> be submitted in the quarterly monitoring reports. The Sanitation Districts request that the requirement for submittal of ELAP certification documents be annual and not quarterly. The requested revision to submit the ELAP certification documents annual instead of quarterly will minimize unnecessary submittals, as laboratories are certified annually.	See response to comment B7.	Revisions have been made to all Tentative MRPs in the Tentative Amended WRRs for all facilities associated with this amendment.
D31	Tentative Amended MRP, Section 4.3.1.f; Remove Annual QA/QC Submittal This section specifies that “A list of the analytical methods used for each test and associated laboratory quality assurance/quality control procedures shall be included...” in the annual reports. The	See response to comment C5.	Revisions have been made to all Tentative Amended MRPs in the Tentative Amended WRRs for all facilities associated with this amendment.

No.	Comment	Response	Action Taken
	Sanitation Districts request that the requirement for submittal of QA/QC documents be upon request, consistent with Section 1.8 of the MRP, which states "...The Permittee shall retain the QA/QC documentation in its files for three years and make available for inspection and/or submit them when requested by the Los Angeles Water Board or DDW..." and that this annual submittal requirement be deleted. The requested revision to submit QA/QC documents upon request of the Los Angeles Water Board or DDW instead of annually will minimize unnecessary submittals, as QA/QC documentation for all samples is extensive.		

**RESPONSE TO COMMENTS
LOS ANGELES COUNTY SANITATION DISTRICTS
LONG BEACH WRP
TENTATIVE AMENDED WRRS, ORDER NO. 87-47-AYY,
AMENDED BY TENTATIVE ORDER NO. R4-2025-XXXX
FILE NO. 69-80**

Comment Email Dated September 25, 2025, from the Los Angeles County Sanitation Districts (Sanitation Districts)

No.	Comment	Response	Action Taken
E1	Tentative Amended WRRs for Long Beach WRP, Finding 3; Update Treatment Process “The treatment consists of primary sedimentation, activated sludge, secondary sedimentation, filtration, and chlorination. The sludge is piped to, and processed at the County Sanitation Districts’ Joint Water Pollution Control Plant in Carson.” Update to, “Treatment consists of primary sedimentation, activated sludge biological treatment with nitrification and denitrification (NDN), coagulation, secondary sedimentation, inert media filtration, chloramination (reactions between sodium hypochlorite and ammonia) for disinfection, and dechlorination. Treated wastewater discharged to Coyote Creek is dechlorinated.”	The Los Angeles Water Board agrees to update the recycled water treatment description, as proposed.	Revisions have been made to the Tentative Amended WRRs for Long Beach WRP.

No.	Comment	Response	Action Taken
	This revision is needed to accurately reflect the current treatment processes at the facility.		
E2	Tentative Amended WRRs for Long Beach WRP, Section A.2; Retain existing TDS and Boron limit	The TDS and boron limits in the Tentative Amended WRRs for the Long Beach WRP were typographical errors and not consistent with the most recent version of the WRRs. The Los Angeles Water Board agrees to update the TDS and boron limit in the Revised Tentative WRRs to be consistent with Order No. 87-47. In addition, revisions have been made to the tentative WRRs for the Long Beach WRP to make language that was not changed by the amendment to be consistent with the most recent version of the WRRs.	Revisions have been made to the Tentative Amended WRRs for Long Beach WRP.
E3	Tentative Amended WRRs for Long Beach WRP, Section D.10, Page 10; Remove D.10 Material-Change Text In accordance with Section 13260 of the Water Code, the Reclaimer shall file a report of any material change or proposed change in character, location or volume of the discharge. This language was not included in the previous permit, although the tentative permit markup suggests that it was. We request that this text be removed.	The Los Angeles Water Board declines the commenter's suggestion to remove this section, which was prescribed based on Water Code section 13260, subdivision (c). Any material change or proposed change in the character, location, or volume of the discharge is considered a substantial change, which will require reopening the permit to reassess the permit conditions and requirements.	None necessary.

No.	Comment	Response	Action Taken
E4	Tentative Amended WRRs for Long Beach MRP, Table E-1; Add Boron Monitoring Frequency Recommend providing monitoring frequency for boron. Given that a boron limit is specified, the MRP should define a monitoring frequency for this constituent.	The Los Angeles Water Board agrees to add boron to Table E-1 in all Tentative Amended MRPs.	Revisions have been made to the Tentative MRP for all WRRs associated with this amendment.

**RESPONSE TO COMMENTS
LOS ANGELES COUNTY SANITATION DISTRICTS
SAN JOSE CREEK WRP
TENTATIVE AMENDED WRRs, ORDER NO. 87-50-AYY,
AMENDED BY TENTATIVE ORDER NO. R4-2025-XXXX
FILE NO. 77-50**

Comment Email Dated September 25, 2025, from the Los Angeles County Sanitation Districts (Sanitation Districts)

No.	Comment	Response	Action Taken
F1	Tentative Amended WRRs for San Jose Creek WRP Finding 1; Facility Description Recommend revising as follows: <i><u>“The Joint Outfall System County Sanitation Districts of Los Angeles County (hereinafter referred to as “Permittee”) operates San Jose Creek Water Reclamation Plant, located at 1965 Workman Road, Whittier, California.. The plant is comprised of two facilities, the San Jose Creek East and San Jose Creek West WRPs with a combined design flow of 100 62.5 million gallons per day (mgd), and recycles all or a portion of its treated municipal wastewater under Waste Discharge Requirements contained in Order No. 81-33 adopted by this the Los Angeles Water Board on July 27, 1981.”</u></i> This revision is needed to accurately reflect the current capacity of the facility.	The Los Angeles Water Board agrees to update the facility description, as proposed.	Revisions have been made to the Tentative Amended WRRs for San Jose Creek WRP.

No.	Comment	Response	Action Taken
F2	Tentative Amended WRRs for San Jose Creek WRP, Finding 2; Recycled Water Uses Recommend revising as follows: <i>“Current use of recycled water <u>for direct non-potable applications</u> includes landscape irrigation <u>at of a golf courses in Industry Hills and ornamental plant irrigation at Arbor and Norman Nurseries</u>, <u>schools, cemeteries, parks, medians and freeways</u>, <u>residential developments, public facilities, and commercial facilities</u>, <u>ornamental plant irrigation at nurseries, cooling towers, dust control at construction sites, and toilet flushing at dual-plumbed facilities</u>.”</i> This revision is needed to accurately reflect the current uses of recycled water.	The Los Angeles Water Board agrees to update the recycled water uses, as proposed, to accurately reflect the current uses of recycled water.	Revisions have been made to the Tentative Amended WRRs for San Jose Creek WRP.
F3	Tentative Amended WRRs for San Jose Creek WRP, Finding 3; Facility Description Recommend revising as follows: <i>“The wastewater treatment consists of primary sedimentation, activated sludge <u>biological treatment with nitrification and denitrification</u>, secondary sedimentation, <u>coagulation, inert dual media filtration</u>, and chlorination. Sludge is diverted to <u>the A.K. Warren Water Resource Facility Joint Water Pollution Control Plant</u> for disposal.”</i>	The Los Angeles Water Board agrees to update the facility description, as proposed, to accurately reflect the current treatment processes at the facility.	Revisions have been made to the Tentative Amended WRRs for San Jose Creek WRP.

No.	Comment	Response	Action Taken
	This revision is needed to accurately reflect the current treatment processes at the facility.		
F4	Tentative Amended WRRs for San Jose Creek WRP, Finding 5; Add Reference to Additional Permits Recommend revising as follows: “<i>The treated wastewater may also be discharged to San Gabriel River under separate waste discharge requirements and National Pollution Discharge Elimination System permit (NPDES Permit No. CA0053911) adopted by this the Los Angeles Water Board. Also, a portion of this effluent is discharged for ground water recharge in the Montebello Forebay under separate Water Reclamation Requirement (Order Nos. 87-40, 91- 100, R4-2009-0048, and R4-2009-0048-A-01) adopted March 23, 1987, and for advanced treatment at the Water Replenishment District Albert Robles Center under separate Water Reclamation Requirement (R4-2018-0129) adopted September 13, 2018.</i> This revision will reference the additional Montebello Forebay permits and the Water Replenishment District Albert Robles Center reuse permit.	The Los Angeles Water Board agrees to update this section, as follows: <i>The treated wastewater may also be discharged to San Gabriel River under separate waste discharge requirements and National Pollution Discharge Elimination System permit (NPDES Permit No. CA0053911) adopted by this the Los Angeles Water Board. Also, a portion of this effluent is discharged for ground water recharge in the Montebello Forebay under separate Water Reclamation Requirement (Order No. 87-40), adopted March 23, 1987, as amended by Order Nos. 91- 100, R4-2009-0048, and R4-2009-0048-A-01, and for advanced treatment at the Water Replenishment District Albert Robles Center under separate Water Reclamation Requirement (R4-2018-0129) adopted September 13, 2018.</i>	Revisions have been made to the Tentative Amended WRRs for San Jose Creek WRP.

No.	Comment	Response	Action Taken
F5	Tentative Amended WRRs for San Jose Creek WRP, Section B.1; Treatment process update <i>Section B.1 (page 3) states: “Recycled water used and produced in compliance with this Order shall be limited to disinfected tertiary recycled water and comply with the definition of disinfected tertiary recycled water in 22 CCR (22 CCR) § 60301.230.”</i> The Tentative Amended WRRs for the San Jose Creek WRP should acknowledge DDW’s approval for the use of sequential chlorination at the San Jose Creek East WRP as an alternative Title 22 disinfection technology as documented in the letter “Conditional Acceptance of Sequential Chlorination at San Jose Creek East WRP to comply with California Water Recycling Criteria (1990005-709)” dated August 21, 2013. The associated Operations Plan for sequential chlorination was approved by DDW on April 22, 2015. Additionally, the Tentative Amended Order should acknowledge DDW’s approval for use of a higher filter loading rate of 7.5 gallons per minute per square foot at the San Jose Creek East WRP as documented in the letter “Filter Loading Evaluation for Water Reuse (FLEWR) Study – Los Angeles County Sanitation District, San Jose Creek East	The definition of Disinfected Tertiary Recycled Water at 22 CCR § 60301.230 includes two options for disinfection in addition to the total coliform requirements: 1. A chlorine disinfection process following filtration that provides a CT (the product of total chlorine residual and modal contact time measured at the same point) value of not less than 450 milligram-minutes per liter at all times with a modal contact time of at least 90 minutes, based on peak dry weather design flow; or 2. A disinfection process that, when combined with the filtration process, has been demonstrated to inactivate and/or remove 99.999 percent of the plaque-forming units of F-specific bacteriophage MS2, or polio virus in the wastewater. A virus that is at least as resistant to disinfection as polio virus may be used for purposes of the demonstration. The sequential chlorination process approved by DDW for the San Jose Creek East WRP is consistent with the second option and therefore no additional changes need to be made to this section to permit the Discharger to use sequential chlorination at the San Jose Creek WRP. However, for clarity and future reference, the Los Angeles Water Board agrees to acknowledge that sequential chlorination is acceptable to use	Revisions have been made to the Tentative Amended WRRs for San Jose Creek WRP.

No.	Comment	Response	Action Taken
	Water Reclamation Plant – Final Report” dated September 12, 2013.	at the San Jose Creek East WRP for compliance with 22 CCR § 60301.230(a) when following the <i>Operations Plan for Sequential Chlorination to Produce Title 22 Recycled Water at San Jose Creek East Water Reclamation Plant</i>. This section has been updated as follows: <i>Recycled water used and produced in compliance with this Order shall be limited to disinfected tertiary recycled water and comply with the definition of disinfected tertiary recycled water in 22 CCR (22 CCR) § 60301.230. On August 21, 2013, the California Department of Public Health (now DDW) conditionally accepted the use of sequential chlorination at the San Jose Creek East WRP for compliance with 22 CCR § 60301.230(a). When using sequential chlorination to comply with 22 CCR § 60301.230(a), the Discharger shall comply with the Operations Plan for Sequential Chlorination to Produce Title 22 Recycled Water at San Jose Creek East Water Reclamation Plant, accepted by DDW on April 22, 2015.</i> The Los Angeles Water Board acknowledges the California Department of Public Health conditionally accepted the higher filter loading rate for the San Jose Creek East WRP on September 12, 2013. The Los Angeles Water Board agrees to include the	

No.	Comment	Response	Action Taken
		higher filter loading rate in the WRRs for the San Jose Creek East WRP when the conditions included in CDPH's letter are met. Section B.4 has been revised in the San Jose Creek WRP Tentative Amended WRRs, as follows: The recycled water producer or distributor shall collectively provide all users recycled water meeting the minimum requirements for disinfected tertiary recycled water that meets the standards for recycled water, as defined in 22 CCR 60301.230 and filtered wastewater, as defined in 22 CCR 60301.320. <u>On September 12, 2013, the California Department of Public Health (now DDW) approved a filter loading rate of 7.5 gallons per minute per square foot (gal/ft²-min) for the San Jose Creek East WRP based on Recycled Water Production at High Filter Loading Rates at the San Jose Creek East Water Reclamation Plant. The filter loading rate at the San Jose Creek East WRP is therefore permitted to operate at a filter load rate of 7.5 gal/ft²-min in lieu of 5 gal/ft²-min to comply with 22 CCR 60301.320 under the following conditions:</u> <u>a. The maximum flow shall not exceed the current permitted flow of 62.5 million gallons per day and instantaneous filter rates shall not exceed 7.5 gal/ft²-min.</u>	

No.	Comment	Response	Action Taken
		<u>b. At loading rates above 5 gal/ft²-min, clarification shall be provided in the same manner as was practiced during the demonstration study to maintain the same range of turbidity levels at the filter influent (i.e. average of 1.0 NTU). The Discharger shall regularly evaluate the secondary effluent quality and filter influent turbidity.</u> <u>c. Combined filter effluent turbidity shall not exceed:</u> <u>1) an average of 1.0 NTU within a 24-hour period,</u> <u>2) 2.0 NTU more than 5 percent of the time within a 24-hour period, and</u> <u>3) 5 NTU at any time</u> <u>d. Turbidity performance compliance shall be determined using the levels of recorded turbidity collected at intervals of no more than 1.2 hours over a 24-hour period.</u> <u>e. The Discharger shall implement and maintain a Standard Operating Procedure (SOP) for operating the tertiary plant at filter loading rates of up to 5 gal/ft²-min and at rates greater than 5 gal/ft²-min. The Chief Plant Operator shall train control room operators on operating the tertiary filters using the high</u>	

No.	Comment	Response	Action Taken
		<u>loading rate SOP, and the SOP shall be available in the control room at all times.</u> The distributor may be a recycled water wholesaler, retail water supplier, or retailer as defined in CWC section 13575.	

**RESPONSE TO COMMENTS
LOS ANGELES COUNTY SANITATION DISTRICTS
SAUGUS WRP
TENTATIVE AMENDED WRRs, ORDER NO. 87-49-AYY,
AMENDED BY TENTATIVE ORDER NO. R4-2025-XXXX
FILE NO. 61-30**

Comment Email Dated September 25, 2025, from the Los Angeles County Sanitation Districts (Sanitation Districts)

No.	Comment	Response	Action Taken
G1	Tentative Amended WRRs for Saugus WRP, page 1, Finding 1; Design Flow Update Update the design flow to “6.5 MGD”. The Saugus WRP was expanded in 1991, and the design flow was upgraded from 5 to 6.5 MGD.	The Los Angeles Water Board agrees to revise this section to be consistent with current operations.	Revisions have been made to the Tentative Amended WRRs for Saugus WRP.
G2	Tentative Amended WRRs for Saugus WRP, page 1, Finding 2; Update Project History Recommend revising as follows: <i>“In 1986 1991 the Permittee completed a <u>flow equalization clean water grant</u> project which <u>expanded the design flow of</u> upgraded the Saugus Water Reclamation Plant (WRP) by adding filtration to the treatment process <u>from 5 mgd to 6.5 mgd</u>. In 2021 the Permittee completed a project at the Saugus WRP to <u>add ultraviolet light disinfection</u>.”</i>	The Los Angeles Water Board agrees to revise this section as proposed to be consistent with current operations.	Revisions have been made to the Tentative Amended WRRs for Saugus WRP.

No.	Comment	Response	Action Taken
	These revisions update the major construction projects at the plant.		
G3	Tentative Amended WRRs for Saugus WRP, page 1, Finding 3; Clarify Diversions & Biosolids Routing Recommend revising as follows: <i>“Influent flow in excess of 5 mgd is diverted to Valencia Water Reclamation Plant for treatment and disposal. The Permittee may divert flow from the Saugus WRP to the Valencia WRP. The Saugus and Valencia WRPs are part of an integrated sewer network which allows for the diversion of influent flow from the Saugus WRP to the Valencia WRP. Additionally, waste activated sludge from the Saugus WRP is routed to the Valencia WRP for biosolids processing.”</i> The Sanitation Districts recommend revising this finding to accurately describe how flow may be diverted from the Saugus WRP to the Valencia WRP.	The Los Angeles Water Board agrees to revise this section as proposed to clarify current operations.	Revisions have been made to the Tentative Amended WRRs for Saugus WRP and Valencia WRP.
G4	Tentative Amended WRRs for Saugus WRP, Finding 4; Treatment Process Update Recommend revising as follows: <i>“Wastewater treatment consists of primary sedimentation, activated sludge <u>biological treatment with nitrification and denitrification</u>, secondary sedimentation, <u>dual media pressure filtration</u>, <u>disinfection (UV and/or chlorination)</u>, and</i>	The Los Angeles Water Board agrees to revise this section as proposed to be consistent with the current treatment process.	Revisions have been made to the Tentative Amended WRRs for Saugus WRP.

No.	Comment	Response	Action Taken
	chlorination <u>dechlorination as needed</u>. The sludge is digested anaerobically and hauled away to a legal point of disposal." The Sanitation Districts recommend revising this finding to correctly describe the current treatment processes at the Saugus WRP.		
G5	Tentative Amended WRRs for Saugus WRP, Findings 7–9; Revise Basin Name Revise the basin name from “Eastern Hydrologic Subarea” to "Santa Clara River Valley East basin." Consistency with the basin name as reported in the most recent version of the Regional Board's Basin Plan.	The Los Angeles Water Board agrees to make this revision for consistency with the Basin Plan.	Revisions have been made to the Tentative Amended WRRs for Saugus WRP and Valencia WRP.
G6	Tentative Amended WRRs for Saugus WRP, Finding 8; Update Basin Plan Date Update when the Basin Plan was most recently revised. Regional Board adopted a Basin Plan in 2019.	The Los Angeles Water Board agrees to revise this section to indicate the purpose of the Basin Plan. Since the Basin Plan undergoes revisions over the years, the date has been removed. This section has been revised as follows: The Los Angeles Water Board adopted a Revised Water Quality Control Plan for the Santa Clara River Basin on March 27, 1978. The Plan contains water quality objectives for ground water in Eastern Hydrologic subarea. The Basin Plan <u>designates beneficial uses for surface and groundwater; establishes narrative and numeric water quality objectives that shall be attained or maintained to protect the</u>	Revision has been made to the Tentative Amended WRRs for all WRRs associated with this amendment.

No.	Comment	Response	Action Taken
		<u>designated (existing and potential) beneficial uses and conform to the State's antidegradation policy; and includes implementation provisions, programs, and policies to protect all waters in the region. In addition, the Basin Plan incorporates all applicable State Water Board and Los Angeles Water Board plans and policies and other pertinent water quality policies and regulations. The Basin Plan contains water quality objectives for ground water in the Santa Clara River Valley East basin Eastern Hydrologic subarea. The</u> requirements contained in this Order, as they are met, will be in conformance with the goals of the Water Quality Control Plan.	

**RESPONSE TO COMMENTS
LOS ANGELES COUNTY SANITATION DISTRICTS
VALENCIA WRP
TENTATIVE AMENDED WRRs, ORDER NO. 87-48-AYY,
AMENDED BY TENTATIVE ORDER NO. R4-2025-XXXX
FILE NO. 65-86**

Comment Email Dated September 25, 2025, from the Los Angeles County Sanitation Districts (Sanitation Districts)

No.	Comment	Response	Action Taken
H1	Tentative Amended WRRs for Valencia WRP, page 1, Finding 1; Design Flow & Reuse Status Update design flow to “21.6 MGD” and remove the statement that “Currently no recycled water is reused.” The Valencia WRP was expanded in 2003, and the design flow was upgraded from 12.6 to 21.6 MGD. Valencia WRP recycled water is currently reused.	The Los Angeles Water Board agrees to revise this section consistent with current operations.	Revision has been made to the Tentative Amended WRRs for Valencia WRP.
H2	Tentative Amended WRRs for Valencia WRP, page 1, Finding 2; Expansion & Timeline Recommend revising as follows: <i><u>“In 1986 2003 the Permittee completed a project that increased the plant’s capacity to 7.5 21.6 mgd. In 2021 the Permittee completed a project at the Valencia WRP to add ultraviolet light disinfection and in 2023</u></i>	The Los Angeles Water Board agrees to revise this section as proposed to be consistent with current operations.	Revision has been made to the Tentative Amended WRRs for Valencia WRP.

No.	Comment	Response	Action Taken
	<u>another project was completed to add advanced water treatment.</u>" The Valencia WRP was expanded in 2003, and the design flow was upgraded from 12.6 to 21.6 MGD.		
H3	Tentative Amended WRRs for Valencia WRP, page 1, Finding 3; Clarify Diversions & Biosolids Routing Recommend revising as follows: <i><u>"The Permittee diverts flows in excess of 5 mgd from the Saugus Water Reclamation Plant to the Valencia Water Reclamation Plant for treatment and disposal. The Permittee may divert flow from the Saugus WRP to the Valencia WRP. The Saugus and Valencia WRPs are part of an integrated sewer network which allows for the diversion of influent flow from the Saugus WRP to the Valencia WRP. Additionally, waste activated sludge from the Saugus WRP is routed to the Valencia WRP for biosolids processing."</u></i> The Sanitation Districts recommend revising this finding to accurately describe how flow may be diverted from the Saugus WRP to the Valencia WRP.	See response to G3.	Revision has been made to the Tentative Amended WRRs for Valencia WRP.
H4	Tentative Amended WRRs for Valencia WRP, Finding 4; Treatment & RO Discharge Recommend revising as follows: "Treatment at the Valencia WRP consists of influent	The Los Angeles Water Board agrees to revise this section as proposed to clarify the current treatment process.	Revision has been made to the Tentative Amended WRRs for Valencia WRP.

No.	Comment	Response	Action Taken
	screening, primary sedimentation, primary effluent equalization, activated sludge biological treatment with nitrification and denitrification, secondary sedimentation, inert media filtration, and disinfection (chlorination). Additionally, a portion of the water treated with inert media filtration undergoes advanced reverse osmosis treatment (for chloride removal). This water is primarily not provided for recycled water (it's discharged to the Santa Clara River after UV disinfection, subject to NPDES Permit No. CA0054216), but can be part of the recycled water treatment process." The Sanitation Districts recommend revising this finding to correctly describe the current treatment processes at the Valencia WRP.		
H5	Tentative Amended WRRs for Valencia WRP, Findings 7–9; Revise Basin Name Recommend revising the basin name to "Santa Clara River Valley East" Need consistency with the most recent version of the Los Angeles Region Basin Plan.	See response to comment G5.	Revision has been made to the Tentative Amended WRRs for Saugus WRP and Valencia WRP.
H6	Tentative Amended WRRs for Valencia WRP, page 1, Finding 8; Update Basin Plan Date Recommend updating when the Basin Plan was most recently revised.	See response to comment G6.	Revision has been made to the Tentative Amended WRRs for all WRRs

No.	Comment	Response	Action Taken
	Regional Board adopted a Basin Plan in 2019.		associated with this amendment.
H7	Tentative Amended WRRs for Valencia WRP, Sections D.15 & D.16; Global WRRs Recommend moving text to match the global WRRs. Proposed D.15.e text: "Except for material determined to be confidential in accordance with applicable law, all reports prepared in accordance with the terms of this Order shall be available for public inspection at the Los Angeles Water Board office. Data on waste discharges, water quality, geology, and hydrogeology shall not be considered confidential." Proposed D.16 text: "This Order includes the attached Monitoring and Reporting Program No. CI-6186. If there is any conflict between provisions stated in the Monitoring and Reporting Program and the Standard Provisions, those provisions stated in the Monitoring and Reporting Program prevail." Global WRRs states that Section D.15 is new with sub bullets "a" through "e", but the Valencia WRR has "e" shown in item "D.16".	The Los Angeles Water Board agrees to fix the formatting on sections D.15 and D.16.	Revision has been made to the Tentative Amended WRRs for Valencia WRP.