

RESPONSE TO COMMENTS

TENTATIVE WASTE DISCHARGE REQUIREMENTS AND WATER RECLAMATION REQUIREMENTS FOR METABOLIC STUDIO WATER TREATMENT PLANT

Commenter List

No.	Commenter	Received Date	Notes
1	Geosyntec Consultants, Inc. on behalf of Metabolic Studio, LLC	November 27, 2024	Comments on the tentative WDRs and WRRs

Comment and Response

No.	Comment Summary	Response to Comment
1-1	<p>On behalf of the Metabolic Studio, LLC (Metabolic Studio), Geosyntec Consultants, Inc. (Geosyntec) has prepared the following comments in response to the received tentative Waste Discharge Requirements (WDRs) and Water Reclamation Requirements (WRRs) package from the Los Angeles Regional Water Quality Control Board (LARWQCB) for the Metabolic Studio Water Treatment Plant Project (Project) located on 1745 North Spring Street and 1792 Baker Street in Los Angeles, California.</p> <p>Geosyntec has the following five comments. These comments are also included in the attachment redlined copy of the Tentative Order No. R4-2024-XXXX.</p>	The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) has reviewed your comments, and our responses to comments are provided below.
1-2	<p>Comment 1:</p> <p>The Metabolic Studios facility address is 1745 North Spring Street and 1792 North Baker Street, Los Angeles, CA 90012. Request to have all</p>	Facility's address is updated, as requested.

No.	Comment Summary	Response to Comment
	cases of the facility address changed from 1796 North Baker Street Los Angeles, CA 90012 to 1792 North Baker Street Los Angeles, CA 90012.	
1-3	<p>Comment 2 – Tentative Order No. R4-2024-XXXX, page 2:</p> <p>Under Background section, Item 1, the following text “...a parcel owned by the Los Angeles County Metropolitan Transportation Authority (LA Metro) ...” is requested to be revised to “...a parcel owned by Metabolic Studios...”.</p>	The subject sentence is revised, as requested.
1-4	<p>Comment 3 – Tentative Order No. R4-2024-XXXX, page 20:</p> <p>Under Effluent Limitations section, Item B.8. states the Title 22 requirements for chlorine disinfection. Note that the primary disinfection process for the Project is ultraviolet (UV) disinfection, which follows the requirements listed in Effluent Limitations section, Item B.6. The chlorination system at the Project is intended to be a secondary disinfection process with the purpose of maintaining a chlorine residual in the storage tank(s) and distribution pipeline(s). The request is to remove or revise Item B.8. accordingly.</p>	The Los Angeles Water Board noted that the primary disinfection process is ultraviolet (UV) disinfection, and the purpose of the chlorination process is to maintain a level of residual chlorine in the storage tank to inhibit microbial growth. The tentative Order requires that the UV disinfected effluent meet the bacteria criteria. Additionally, the final effluent shall meet the bacteria effluent limits set forth in Table 9 of the Order. Therefore, the chlorine disinfection criteria is deleted, as requested.
1-5	<p>Comment 4 – Tentative Order No. R4-2024-XXXX, page 21:</p> <p>Under Use Area Requirements section, Items E.1. and E.2. require minimum distances of 50 and 100 feet, respectively, between the Project’s irrigation areas and treated water storage/impoundment and domestic water supply wells. Similar requirements are noted under General Requirements section, Items F.5 and F.6, with different distance criteria of 600 feet. At this time the Project meets both sets of requirements, and it is requested that the applicable distance</p>	General Requirements F.5 and F.6 are revised to be consistent with the Use Area Requirements E.1 and E.2, as requested.

No.	Comment Summary	Response to Comment
	requirements be clarified as 50 and 100 feet for consistency across both Item E. and F.	
1-6	<p>Comment 5 – Tentative Order No. R4-2024-XXXX, pages 29 and 30:</p> <p>Under Provisions section, Items H.12 and H.16, “the City” should be updated to “the Discharger”.</p>	Provisions H.12 and H.16 are corrected, as requested.
1-7	If you have any questions in this regard, please contact the undersigned at <i>hamini@geosyntec.com</i> .	Noted.