RESPONSE TO COMMENTS
JOINT OUTFALL SYSTEM
JOINT WATER POLLUTION CONTROL PLANT
TENTATIVE ORDER NO. R4-2023-XXXX
NPDES NO. CA0053813

Comment Email dated April 12, 2023, from Joint Outfall System

No.	Comment	Response	Action Taken
A1	**Update the site layout in Attachment B.3 and the flow schematic in Attachment C.**	Los Angeles Water Board agrees.	The site layout in Attachment B.3 and the flow schematic in Attachment C were updated.

Comment Letter dated May 1, 2023, from Joint Outfall System

No.	Comment	Response	Action Taken
A2	**Section 8.1 (page E-38) states: The Discharger shall submit an annual receiving water summary report containing the shoreline microbiological monitoring results, using the Palos Verdes Peninsula and the Santa Monica JG7 Coordinated Integrated Monitoring Programs for Shoreline Stations of RW-SL-SB, RW-SL-SM, RW-SL-S1, RW-SL-S2, RW-SL-S3, RW-SL-S5, RW-SL-S6, and RW-SL-S7.**	Los Angeles Water Board acknowledges that the shoreline monitoring has been conducted by the Palos Verdes Peninsula and Santa Monica JG7 Coordinated Integrated Monitoring Programs and required under the Municipal Separate Storm Sewer System (MS4) NPDES permit for Los Angeles County since July 2018. Los Angeles Water Board removed the shoreline monitoring requirements in section 8.1 of the Monitoring and Reporting Program (MRP). However, to confirm the discharge from the Facility is not contributing to any shoreline exceedances, section 10.4.4. of the MRP is	Revisions have been made to the Order.

	The Sanitation Districts no longer collect or analyze microbiological samples from the shoreline stations. Monitoring and reporting are now the primary responsibility of the Palos Verdes Peninsula and the Santa Monica JG7 Coordinated Integrated Monitoring Programs. The Sanitation Districts respectfully request that the Regional Board modify the tentative permit to indicate that the annual receiving water summary report will be provided by the parties responsible for routine monitoring of these shoreline locations.	modified to include submittal of a summary of the shoreline monitoring data.	
A3	**Table E-18 of the MRP requires annual acute sediment toxicity testing. Footnote c to table E-18 (p. 113) also states: "The Discharger shall conduct acute sediment toxicity monitoring as described in Table E-18 at the bottom stations in Table E-17. This testing shall be conducted in year three."** The Sanitation Districts respectfully request that the Regional Board clarify the monitoring time frame and frequency for acute sediment toxicity testing. The Sanitation Districts are also requesting that the acute sediment toxicity testing frequency remain unchanged from current permit	Acute sediment toxicity is required in section 7.1 of Appendix III of the 2019 Ocean Plan. For discharges greater than 10 MGD in a low energy coastal environment with the likelihood of sediment deposition, core monitoring for acute sediment toxicity is required. Core acute sediment toxicity monitoring for similar facilities with greater than 10 MGD discharge flows in the Los Angeles region occurs annually. Acute sediment toxicity monitoring is required to determine if the concentrations of toxic pollutants not being monitored individually in the sediment are contributing to toxicity, or if the combined effect of toxic pollutants in the sediment is contributing to toxicity. Los Angeles Water Board staff have determined that annual acute sediment toxicity is appropriate for this	Revision was made to section 8.3.1.c. of the MRP to clarify the acute sediment toxicity requirement.

	requirements (once per permit cycle). All sediment toxicity results during the last permit cycle were non-toxic, and an unwarranted increase in sampling frequency would be a significant drain on Sanitation Districts' resources.	discharge because the permitted discharge flow rate is 400 MGD, occurs in a low energy coastal environment, and because the annual sediment chemistry monitoring does not reflect the toxic effect of pollutants not monitored or the combined toxic effect of multiple pollutants. The annual monitoring frequency for acute sediment toxicity testing is consistent with other ocean dischargers, such as the Hyperion WRP.	
A4	**Table E-18 of the MRP requires annual dissolved sulfide monitoring in sediment porewater.** The Sanitation Districts respectfully request that the Regional Board modify Table E-18 of the MRP to either remove or reduce dissolved sulfide monitoring in sediment porewater. Dissolved sulfides have not been detected in a majority of the locations as far back as 2015. The last detection was for one sample in 2019 (8C). There were only four other detections from 2015-2017 (locations 0A, 8C, 8A, and 7A). The reporting limit for the method used by the Sanitation Districts is lower than what most labs offer, and detections are all in the low ug/L (ppb) levels. If monitoring cannot be eliminated, the Sanitation Districts recommend monitoring only sites that had historical detections.	Section 6.1 of Appendix III of the 2019 Ocean Plan requires annual sediment monitoring of acid volatile sulfides for discharges greater than 10 MGD. Since dissolved sulfides are not required to be monitored under the 2019 Ocean Plan and acid volatile sulfides have not been monitored historically, acid volatile sulfides must be monitored in lieu of dissolved sulfides. Since acid volatile sulfides was not previously required to be monitored in the sediment, this requirement has been included in the permit to comply with the 2019 Ocean Plan requirements. As allowed in the 2019 Ocean Plan, if sufficient data is provided from previous water column monitoring for this parameter, the Los Angeles Water Board may reduce the monitoring frequency in the future at its discretion.	Revisions were made to the sediment chemistry monitoring requirements in Table E-18 of the MRP.

A5	**The definition of Chlordane in Attachment A of the Tentative Permit is "the sum of chlordane-alpha, chlordane-gamma, chlordene-alpha, chlordene-gamma, nonachlor-alpha, nonachlor-gamma, and oxychlordane."** Primary and secondary analytical standards for chlordene-alpha and chlordene gamma are currently not readily available from vendors, which makes it difficult if not impossible to comply with the monitoring of "chlordane," as defined in the permit. Compliance with this definition of "chlordane" has been an ongoing issue for other facilities with similar definitions in their permits. These compounds are not part of CA ELAP's approved fields of testing and there are no commercial laboratories currently offering these compounds for analysis. The Sanitation Districts recommend the following alternatives to monitor for "chlordane": a. Monitoring of "chlordane" as **technical chlordane** (CAS # 12789-03-6), defined as a mixture of chlordane and chlordane related compounds. Reporting technical	The definition of chlordane in Attachment A of the Tentative Order is the same definition included in Appendix I of the 2019 Ocean Plan; therefore, to be consistent with the Ocean Plan the definition in the Order cannot be changed. Requests for changes to the definition of chlordane in the Ocean Plan can be submitted during the public review process of the next rendition of the Ocean Plan. The Los Angeles Water Board recognizes certain standards may be difficult to attain, making the chlordane monitoring requirement difficult to achieve. If LACSD has difficulty attaining the appropriate standards for analysis in a given monitoring period, this should be clearly explained in the monitoring report. In addition, the following footnote has been included in the Order to recognize that it may not always be feasible to attain standards for chlordane-alpha and chlordene-gamma: *The standards required to analyze chlordene-alpha and chlordene-gamma may not always be readily available, therefore if the Discharger provides documentation in the self-monitoring report to the Los Angeles Water Board that the standards for these pollutants were not available during the monitoring period, monitoring results for chlordene-alpha and/or chlordene-gamma are waived for that monitoring period only. If monitoring for chlordene-alpha and/or chlordene-gamma is waived for a monitoring*	Revisions were made to Table E-9 and Table E-10 of the MRP.

	chlordane is consistent with the "chlordane" reported for other facilities. b. Monitoring of "chlordane" as the sum of 5 compounds (chlordane-alpha, chlordane-gamma, nonachlor-alpha, nonachlor-gamma, and oxychlordane). With the exception of year-3 of the current permit, this 5-compound definition was the required “chlordane” monitoring for JWPCP. c. If updating the permit definition of "chlordane" is not feasible, the Sanitation Districts respectfully requests for the addition of the following language in the permit: **The Discharger may temporarily suspend the monitoring requirements for alpha and gamma-chlordene if analytical standards for these compounds are not available. However, the Discharger is required to resume detection and quantification practices as soon as standards become available.** This language is included in Orange County Sanitation Districts' NDPES permit (ORDER NO. R8-2021-0010, NPDES NO. CA0110604, effective: August 1, 2021).	*period, all other components included in the definition of chlordane must still be analyzed.*	

	The Sanitation Districts will continue to monitor for the availability of chlordene alpha and gamma standards and can resume monitoring (if required) soon after primary **and** secondary analytical standards are routinely offered by vendors.		

A6	**Section 7.3.4.d states: The Permittee shall perform monthly maintenance and operational testing for all emergency infrastructure and equipment at the facility, including but not limited to any bypass gate/weir in the headworks, alarm systems, backup pumps, standby power generators, and other critical emergency pump station components. The Permittee shall update the Operation and Maintenance Plan to include monthly maintenance and operational testing of emergency infrastructure and equipment and shall keep the records of all operational testing for emergency systems, repairs, and modifications.** For certain bypass and discharge valves, monthly maintenance is not feasible due to safety concerns and the potential for accidental non-permitted discharges. The Sanitation Districts will comply with this requirement to the fullest extent possible but respectfully request the following revision to Section 7.3.4.d. The Permittee shall perform monthly maintenance ~~and operational testing~~ for all emergency infrastructure and	Los Angeles Water Board agrees to modify section 7.3.4.d as proposed, except that the frequency of operational testing of the emergency infrastructure and equipment remains as currently expressed, and must be conducted monthly.	Revisions have been made to the section 7.3.4.d of the Order.

	equipment at the facility, including but not limited to any bypass gate/weir in the headworks, alarm systems, backup pumps, standby power generators, and other critical emergency pump station components. The Permittee shall also perform operational testing of emergency infrastructure and equipment if operation of such infrastructure and equipment does not result in a violation of this permit or cause a safety hazard. The Permittee shall update the Operation and Maintenance Plan to include monthly maintenance and operational testing of emergency infrastructure and equipment and shall keep the records of all operational testing for emergency systems, repairs, and modifications.		

Attachment 1 – Comments on Tentative NPDES Permit for JWPCP (NPDES No. CA0053813)			
A7	**Add the following language from the current permit in permit sections 6.1.1.a and c:** During a wet-weather event, stormwater runoff will impact inshore and offshore stations. The day of rain (0.1 inch and greater), plus three following days' worth of bacteriology data, should be excluded from Single and Geometric mean limits.	The State Water Board Water-Contact Objectives are required in this permit based on section II.B.1.a. of the 2019 Ocean Plan. The 2019 Ocean Plan does not provide for an exclusion to rain or stormwater runoff. To be consistent with the Ocean Plan, no exception is provided for wet weather in this Order.	None necessary.
A8	**Permit section 6.1.1.a.ii states: "Enterococci: A six-week rolling GM of Enterococci not to exceed 30 colony forming units (cfu) or most probable number (MPN) per 100 mL, calculated weekly, and a statistical threshold value (STV) of 110 cfu/100 mL not to be exceeded by more than 10 percent of the samples collected in a calendar month, calculated in a static manner. USEPA recommends using USEPA Method 1600 or other equivalent method to measure culturable Enterococci."** The Sanitation Districts respectfully request the Regional Board to explain the basis of this new requirement, and to provide guidelines and examples on	The State Water Board Water-Contact Objectives are required in this permit based on section II.B.1.a.(1) of the 2019 California Ocean Plan. Compliance with this objective is required at monitoring stations bounded by the shoreline and a distance of 1,000 feet from the shoreline or the 30-foot contour, whichever is further from the shoreline, and in areas outside the zone used for water contact sports (waters designated as REC-1), but including all kelp beds. Section 8.17. of the Tentative Order describes how compliance is determined for bacterial standards. The geometric mean is calculated weekly on a rolling basis using the previous 6 weeks of *Enterococcus* data and the following equation: $GM = \sqrt[n]{(x_1)(x_2)(x_3)\cdots(x_n)}$	None necessary.

	how properly calculate/report/comply with this new requirement.	Where x is the sample value and n is the number of samples collected. The statistical threshold value (STV) is defined in Attachment A and is a set value that approximates the 90th percentile of the water quality distribution of a bacterial population. The STV is a predefined value equivalent to 110 cfu/100 mL. To determine compliance with the STV objective, no more than 10% of the *Enterococcus* samples collected in a given month may exceed 110 cfu/100 mL.	
A9	**Order Section 7.3.1. Include the following reopener provision included in the current permit:** The Regional Water Board will reconsider the ammonia performance goals and may reopen the Order if the Discharger has demonstrated that conservation efforts and recycling projects have caused an increase in the ammonia concentration, the plant is optimized with respect to ammonia control, and the Discharger provides justification that the proposed modification will not impact the beneficial uses of the receiving water.	If the Discharger can demonstrate to the satisfaction of the Los Angeles Water Board that a change to a performance goal is warranted, the Los Angeles Water Board will consider reopening the permit to update the performance goals. This is not specific to ammonia so the following reopener has been added to the Order: "<u>This Order may be reopened and modified to revise any of the performance goals or mass emission benchmarks if the Discharger submits a request and demonstrates to the satisfaction of the Los Angeles Water Board that the change is warranted, and will not adversely impact the beneficial uses of the receiving water.</u>"	Revision was made to section 7.3.1. of the Order.
A10	**Order Section 7.3.1. Include the following reopener provision included in the current permit:**	Santa Monica Bay (Offshore and Nearshore) is on the 303(d) list for the following pollutants/stressors from point and non-point sources: DDT (tissue & sediment), arsenic, mercury, PCBs (tissue & sediment), and trash.	None necessary.

	This Order may be reopened and modified, to revise effluent limitations as a result of the delisting of a pollutant from the 303(d) list.	The Order will not be reopened if a pollutant is delisted from the 303(d) list because the only pollutants on the 303(d) list that were also assigned effluent limitations include DDT and PCBs and both these pollutants have wasteload allocations assigned in the Santa Monica Bay TMDL for DDTs and PCBs. Since this TMDL has been adopted as a Basin Plan amendment, the effluent limitations in the Tentative Order cannot be modified unless the Basin Plan is further amended to remove these wasteload allocations. The reopener in section 7.3.1.m. of the Tentative Order already covers effluent limitations related to Basin Plan amendments and therefore no additional changes are necessary.	
A11	**Modify section 7.3.4.b of the Order as follows to remain consistent with the other Districts' NPDES permits:** The Discharger shall consider the impacts of climate change as they affect the operation of the treatment facility due to flooding, wildfires, or other climate related changes. The Discharger shall develop a Climate Change Effects Vulnerability Assessment and Mitigation Plan (Climate Change Plan) to assess and manage climate change-related effects that may impact the wastewater treatment facility's	The Climate Change Plan is required to mitigate the effects of climate change on water resources and its associated beneficial uses. The requirements for the Climate Change Plan have evolved since the adoption of the last permit issued to one of the Districts' NPDES permits, and therefore the language has changed in the most recently adopted NPDES permits in the Los Angeles region. The Los Angeles Water Board has identified threats to the sewer system and greenhouse gas emissions to be key components of a Climate Change Plan because they both have the potential to impact water quality and/or the beneficial uses of the receiving water body. Since these components	None necessary.

	operation, water supplies, its collection system, and water quality, including any projected changes to the influent water temperature and pollutant concentrations, and beneficial uses. For facilities that discharge to the ocean including desalination plants, the Climate Change Plan shall also include the impacts from sea level rise. The Climate Change Plan is due 12 months after effective date of this Order.	are directly related to water quality and the beneficial uses of the receiving water, no changes to the language are necessary.	
A12	**Section 7.3.6.a.ii. of the Order.** Extend the deadline to submit an emergency communications protocol to the Los Angeles Water Board from 30 days to 60 days.	Since this is a new requirement, Los Angeles Water Board agrees to extend this deadline.	Revision was made to the Order.
A13	**Modify MRP section 3.1 as follows:** Influent grab samples (except for <u>VOCs and</u> oil and grease) are collected from three influent sewers upstream of the bar screens, composited, and analyzed as a single grab sample. <u>Influent VOCs are collected from the three influent sewers upstream of the bar screens and analyzed as three separate grab samples.</u> Influent grab samples for oil and grease are collected from each of the five grit chambers and analyzed	Los Angeles Water Board agrees that the additional language helps clarify how samples are collected and the revisions are appropriate.	Revisions were made to the Order.

	as five separate grab samples. Individual VOC and Oil and Grease results are combined into one flow weighted value.		
A14	**MRP sections 3.1 and 4.1. Remove footnotes d and e for chromium VI and chromium (III) in Table E-9 and Table E-10, respectively.** Remove footnote d and e from Chromium-VI and Chromium-III. The method for Chromium VI requires filtration and results are not reported as a total recoverable value. Chromium III is a calculated value.	Los Angeles Water Board agrees to remove footnotes d and e from Table E-9 and Table E-10, respectively.	Revisions were made to the Order.
A15	**MRP sections 3.1 and 4.1, Table E-9 and Table E-10.** The monitoring frequency for chlordane, benzidine, toxaphene, hexachlorobenzene, and 3'3'-dichlorobenzidine are not consistent: semiannually in influent but quarterly in effluent. Recommend keeping the monitoring frequency on a semi-annual basis to keep the influent and effluent monitoring consistent with each other and also aligned with the monitoring frequency of other SVOCs.	The reasonable potential analyses for chlordane, benzidine, toxaphene, hexachlorobenzene, and 3,3'-dichlorobenzidine were inconclusive since there were no detections of these pollutants. Since these pollutants were not detected and the method detection limit for each of these pollutants exceeds the corresponding water quality objective for each pollutant, there is uncertainty as to whether these pollutants are present at concentrations above their respective water quality objectives. As a result, the effluent limitations and quarterly effluent monitoring frequency were carried over in the Tentative Order for these pollutants. The influent monitoring frequency for these pollutants does not need to be consistent with the effluent	None necessary.

		monitoring requirements. Monitoring the influent does provide valuable information regarding treatment plant performance and may provide insight on pollutants that may be passing through the treatment system, but the effluent is what ultimately makes its way to the receiving water so the increased effluent monitoring frequency is appropriate to ensure these pollutants are not exceeding the water quality objectives.	
A16	**MRP section 3.1, Footnote e, Table E-9.** **USEPA Method 1631E, with a quantification level of 0.5 ng/L, shall be used to analyze total mercury.** Historical influent data for mercury at JWPCP (2017-present) is in the range of 100-480 ng/L, at least two orders of magnitude greater than the required quantification level of 0.5 ng/L. EPA 1631E requires an ultra-clean sampling procedure coupled with a highly sensitive analytical method, and neither is appropriate for raw influent matrix with detectable levels of mercury at the ug/L level. Recommend adding language that allows for the use of 40-CFR-approved and ELAP accredited EPA Method 245.1 to monitor for influent mercury. The reporting limit of this method is 40 ng/L which is below the lowest mercury	Los Angeles Water Board agrees that it is unnecessary to use USEPA Method 1631E to analyze mercury if another sufficiently sensitive method exists. Footnote e of Table E-9 was revised as follows: "USEPA Method 1631E, with a quantification level of 0.5 ng/L, shall be used to analyze total mercury, unless another 40 CFR 136 method is sufficiently sensitive (ex. influent concentrations exceed the quantification level in the approved method)."	Revision was made to the Order.

	concentration detected in JWPCP influent.		
A17	**MRP section 4.1, Table E-10.** Spell out the compound name Hexachlorocyclohexanes (HCH) for clarity and consistency with the parameters listed in Table E-9.	Acronyms are spelled out the first time they are used in the MRP. Since HCH was spelled out and defined in Table E-9, no changes are necessary.	None necessary.
A18	**MRP section 4.1, Table E-10.** **Temperature sample type and minimum sampling frequency updated from grab/daily to recorder/continuous.** Request clarification on how to report temperature. There are no relevant footnotes to this change in the tentative permit. Footnote b for table E-10 has instructions on continuous flow monitoring but not temperature.	For continuous temperature monitoring, the minimum, maximum, and average temperatures recorded during the day and during the month should be reported. Footnote b has been added to temperature in the table and revised as follows: "When continuous monitoring of flow is required, total daily flow, monthly average flow, and instantaneous peak daily flow (24-hour basis) shall be reported. Actual monitored flow shall be reported (not design capacity). <u>When continuous monitoring of temperature is required, the daily minimum, maximum, and average temperatures recorded over the course of each day and month shall be reported.</u>"	Revision was made to the Order.
A19	**MRP section 4.1, Footnote d, Table E-10.** **Oil and Grease, and settleable solids monitoring shall consist of a single grab sample at peak flow over a 24-hour period.**	Additional settleable solids samples may be collected to confirm a potential daily effluent limit exceedance; however, all samples collected and analyzed using an approved analytical method will be subject to the applicable settleable solids effluent limitation.	None necessary.

	Request clarification if additional Settleable Solids samples can be collected over the same 24-hour period to confirm a potential daily effluent limit exceedance.		
A20	**MRP section 4.1, Table E-10.** **Reporting units for PCBs as congeners is in ug/L.** Change PCB congener reporting units from ug/L to pg/L. Results for these parameters are routinely reported in pg/L. Converting to ug/L can potentially create reporting errors (e.g. entering the wrong number of zeros after the decimal).	Los Angeles Water Board agrees. The concentrations reported for PCBs as congeners is more easily reported in pg/L.	Revision was made to the Order.
A21	**MRP section 4.1, Footnote f, Table E-10.** **USEPA Method 1631E, with a quantification level of 0.5 ng/L, shall be used to analyze total mercury.** The Ocean Plan water quality objective for mercury is 40 ng/L (0.04 ug/L) and the JWPCP effluent performance goal is 1000 ng/L (1 ug/L). The requested quantification level is significantly below the ocean plan objective and three orders of magnitude below the performance goal. Recommend adding language	The method detection limits the Discharger reported for total recoverable mercury in the effluent ranged from 0.004 ug/L (4 ng/L) to 0.019 ug/L (19 ng/L). The nineteen quarterly effluent samples collected in January, April, July, and November between November 2017 and April 2022 showed two DNQs reported as 0.01 ug/L (10 ng/L) and seventeen NDs (ranging from less than 0.008 ug/L (8 ng/L) to 0.019 ug/L (19 ng/L). All effluent results were lower than the most stringent 2019 California Ocean Plan mercury water quality objective of 0.04 ug/L (40 ng/L). Los Angeles Water Board agrees that it is unnecessary to use USEPA Method 1631E to	Revision has been made to the Order.

	that allows for the use of 40-CFR-approved and ELAP accredited EPA Method 245.1 to monitor for effluent mercury. The LACSD reporting limit for this method is 40 ng/L (0.04 ug/L) which is below the effluent performance goal of 1000 ng/L and also satisfies the Ocean Plan mercury water quality objective of 40 ng/L.	analyze mercury if another sufficiently sensitive method exists. Footnote e in Table E-9 was revised as follows: "USEPA Method 1631E, with a quantification level of 0.5 ng/L, shall be used to analyze total mercury, unless another 40 CFR 136 method is sufficiently sensitive (ex. the quantification limit is less than or equal to the most stringent water quality objective)."	
A22	**MRP section 4.1, Footnote l, Table E-10.** **"...permittees should use for discharge monitoring reports/State monitoring reports: (1) USEPA method 608 for monitoring data, reported as aroclor results."** Request to revise Method 608 to **608.3**.	Los Angeles Water Board agrees to require the more current version of Method 608.	Revision was made to the Order.
A23	**MRP section 5.4.** **As required in the test method for *Atherinops affinis* for off-site tests, a minimum of three samples shall be collected on days one, three, and five with a maximum holding time of 36 hours before the first use.** The current permit does not specify when the additional 2 samples have to be collected. The current language in	This sampling requirement is based on the test method required in the Order, method 1006.0 in *Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to West Coast Marine and Estuarine Organisms*. It is preferred to collect the test samples on days one, three, and five; however, it is not required. The language has been modified for clarification.	Revision was made to the Order.

	the Tentative Permit will pose logistical issues with collection and shipping of toxicity samples to contract laboratories. Request replacing the current language with the original language in the current permit: **As allowed under the test method for *Atherinops affinis*, a second and third sample may be collected for use as test solution renewal water as the seven-day toxicity test progresses.**		
A24	**MRP Section 8.2. Footnote a in Table E-14.** **a. Pollutants shall be analyzed using the analytical methods described in 40 CFR part 136; where no methods are specified for a given pollutant, by methods approved by this Los Angeles Water Board or State Water Board. The analytical method with the lowest ML must be selected.** This footnote is only applicable to ammonia and not the other parameters on table E-14. Revise to add *footnote* a on the Notes column for ammonia and remove the *footnote a* reference on other parameters.	The Los Angeles Water Board agrees to make the changes. Table E-14 includes nearshore and offshore monitoring requirements and continuous profiles are measured using sensors to monitor dissolved oxygen, temperature, salinity, transmissivity, chlorophyll a, and pH. Since these parameters are measured using sensors, the methods in 40 CFR 136 do not apply and footnote a is not applicable. Since ammonia is collected as a grab sample and analyzed in the lab, the methods at 40 CFR 136 do apply and footnote a is applicable.	Revisions were made to the Order.

A25	**MRP section 10.4.5 (E-59).** **All receiving water monitoring data shall be submitted in accordance with the California Environmental Data Exchange Network (CEDEN), when the system accepts data such as bioassessment /taxonomic data and continuous data. The Discharger shall submit all receiving water monitoring data in accordance with CEDEN, when feasible.** Integrated Report data are currently being pulled from CIWQS. Reporting these RSW data to CEDEN would result in duplicative Lines of Evidence which would require extensive QA from Water Boards and Districts staff. Districts' data should be reported to EITHER CIWQS or CEDEN, not both, so there should be no duplicative data submission. Request to revise the language to: Receiving water monitoring data shall be submitted in accordance with the California Environmental Data Exchange Network (CEDEN), when the system accepts data ***that are not already submitted in CIWQS*** such as toxicological/taxonomic data. **These** receiving water monitoring data shall	Data uploaded in CEDEN is used to determine the list of impaired water bodies in the State of California, so the data reported to CEDEN is vital in determining which water bodies should be priority when developing total maximum daily loads. The Los Angeles Water Board recognizes that data that is uploaded to CIWQS needs to be converted to another format to be recognized by CEDEN, so a CEDEN-compatible PET tool has been created to help make it easier to translate CIWQS data into CEDEN. Since the CEDEN-compatible PET tool is still difficult to use to upload data into CEDEN, the Los Angeles Water Board and State Water Board staff will work with the Discharger to make the PET tool more user friendly. Since receiving water quality data is crucial in determining impaired water bodies and CEDEN will not be able to extract data from CIWQS anytime in the near future, the commenter's suggested changes to this reporting requirement are not appropriate. However, since the data collected in compliance with this Order may not be able to be uploaded using the PET Tool, the requirement in section 10.4.5. of the MRP was modified to acknowledge that the data needs to be uploaded when feasible.	Revisions were made to section 10.4.5. of the MRP.

	be submitted in accordance with CEDEN, when feasible.		
A26	**Fact Sheet Section 5.1. Table F-14.** Request to review the MEC values used to calculate the performance goals for the following compounds: Cr-VI, copper, chlorinated/non-chlorinated phenols, chloroform, and dichloromethane. MECs on table F-14 for these parameters do not match the max values reported in the ROWD. For example, MEC for Cr-VI and copper on Table F-14 are 0.12 and 4.96 ug/L respectively. Cr-VI and copper max values in the ROWD are 0.08 and 4.36 ug/L respectively.	The MECs for all pollutants, including Chromium VI, copper, chlorinated/non-chlorinated phenols, chloroform, and dichloromethane, were based on effluent data collected between November 2017 and June 2022 that were uploaded to CIWQS by the Discharger. The date range for the data in the ROWD was November 2017 to December 2021, and therefore did not include the most recent data used in the RPA. The MEC of 0,12 ug/L for chromium VI was reported for March 3, 2022 and the MEC of 4.96 ug/L for copper was reported for April 5, 2022. The data used for RPA for the specified pollutants were emailed to the Discharger on May 5, 2023.	None necessary.
A27	**Attachment H - 3.4** **3.4. The biosolids shall be tested annually or more frequently, if necessary, to determine hazardousness in accordance with California Law.** Request clarification on the exact requirement or definition of hazardousness.	Hazardousness shall be determined based on the definition of Hazardous Waste in Title 22 of the California Code of Regulations Article 1, Chapter 11, Division 4.5 (section 66261.3). Section 3.4 of Attachment H has been revised to clarify this requirement.	None necessary.
A28	**7.3. Land Application Notification** **A reuse/disposal plan shall be submitted to USEPA Region 9**	Regarding the harvesting restrictions, a root crop (carrots, potatoes, radishes, etc.) cannot be harvested within 38 months of applying Class B biosolids (40 CFR 503.32(b)(5)(iii)). Most of the	None necessary.

	Coordinator and, in the absence of other state or regional reporting requirements, to the state permitting agency, prior to the use or disposal of any biosolids from this facility to a new or previously unreported site. The plan shall be submitted by the land applier of the biosolids and shall include a description and a topographic map of the proposed site(s) for reuse or disposal, names and addresses of the applier(s) and site owner(s), and a list of any state or local permits which must be obtained. For land application sites, the plan shall include a description of the crops or vegetation to be grown, proposed nitrogen loadings to be used for the crops, a determination of agronomic rates, and a groundwater monitoring plan or a description of why groundwater monitoring is not required. **If the biosolids do not meet 40 CFR § 503.13 Table 3 metals concentration limits, the Permittee must require their land applier to contact the state permitting authority to determine whether bulk biosolids subject to the cumulative pollutant loading rates in 40 CFR § 503.12(b)(2) have been applied to**	sites in Yuma and Maricopa Counties where the JWPCP biosolids are applied do not grow food crops. But if a farmer were to switch to food crops, the Joint Outfall System and their contractor for land application need to ensure that the farmer is informed that no root crops can be grown for 38 months following application.	

	the site since July 20, 1993, and, if so, the cumulative amount of pollutants applied to date, and background concentration, if known. The Permittee shall then notify USEPA Region 9 Coordinator of this information. **For biosolids that are land applied, the Permittee shall notify the applier in writing of the nitrogen content of the biosolids, and the applier's requirements under 40 CFR part 503, including the requirements that the applier certify that the requirement to obtain information in Subpart A, and that the management practices, site restrictions, and any applicable vector attraction reduction requirements Subpart D have been met. The Permittee shall require the applier to certify at the end of 38 months following application of Class B biosolids that those harvesting restrictions in effect for up to 38 months have been met.** The language above is a revision of the requirement for land application notification. The land applier would be responsible for notifying USEPA of new sites, instead of the Permittee. The land applier would also be		

	required to provide a groundwater monitoring plan or justification for exemption. The land applier will also have to certify that harvesting restrictions have been met after 38 months. Request clarification on the harvesting restrictions and the 38-month requirement.		
A29	The Discharger noted some typographical errors and requested that they be corrected.	The typographical errors pointed out by the Discharger have been corrected unless otherwise noted in the responses above.	Revisions have been made to the Order and Attachments in various places.

Comment Letter dated April 28, 2023, from Heal the Bay and Los Angeles Waterkeeper

No.	Comment	Response	Action Taken
B1	**If dilution credits apply to the chronic toxicity testing at Discharge Points 001 and 002, the Regional Board should require acute toxicity testing under the monitoring and reporting program.** The Tentative Permit states that dilution credits are applied at Discharge Points 001 and 002. If these dilution credits apply to the chronic toxicity testing, it would still be possible for acute toxicity testing to show toxicity in situations where chronic toxicity is not demonstrated. If the permittee is allowed to apply dilution credits to chronic toxicity testing, there should be requirements for acute testing without these credits applied. Dilution	Acute toxicity testing is conducted over a short time period and measures mortality whereas chronic toxicity is conducted over a longer time period and may measure mortality, reproduction, and growth. Since chronic toxicity testing occurs over a longer time period and still measures mortality, acute toxicity can still be inferred from the chronic toxicity tests by observing the toxic effect over the course of the first few days. Dilution credits are granted to this facility based on a dilution study conducted by the Discharger in 2016 using data collected	None necessary.

	credits should never be applied to acute toxicity because the toxicological effect of morbidity is too severe. We request that the Regional Board remove the dilution credits for the chronic toxicity testing, or alternatively maintain dilution credits for chronic toxicity and require acute toxicity testing without dilution credits under the monitoring and reporting program.	between 2001 and 2011. The dilution study considered many factors, such as the size of the mixing zone, ocean and effluent salinity and temperature, outfall design, diffusers, etc. Dilution credits are only granted within the mixing zone and outside the mixing zone water quality must meet the water quality objectives to protect the beneficial uses. The 2019 Ocean Plan requires compliance with the water quality objectives at stations representative of the area within the waste filed where initial dilution is completed (section II.A.3.) and therefore the dilution credits granted in the Tentative Order are appropriate. Section III.C.4.c. of the 2019 Ocean Plan also provides direction on when chronic and acute toxicity are required to be conducted based on the dilution applied to the discharge. Three dilution credits apply to this facility, depending on the discharge point: 166:1 for Discharge Point 001 and 002, 150:1 for Discharge Point 003, and 115:1 for Discharge Point 004. For dilution factors between 100:1 and 350:1 (which is applicable to dilution credits for all 4 discharge points), the 2019 Ocean Plan requires chronic toxicity to be conducted. However, the 2019 Ocean Plan leaves the application of acute toxicity testing to the discretion of the regional water boards as necessary for the protection of beneficial uses of the ocean waters. Since toxicity testing requirements in the Tentative Order follow the directives in the 2019 Ocean Plan and the	

		effects of acute toxicity can be inferred through the chronic toxicity results, the Los Angeles Water Board finds the acute toxicity testing is not necessary, and the chronic toxicity testing requirements in the Tentative Order are appropriate and protective of beneficial uses of ocean waters.	

B2	**Mass emission benchmarks should be replaced with enforceable effluent limitations.** Mass emission benchmarks are extremely poor regulatory mechanisms, and should be replaced with enforceable effluent limitations. The Tentative Permit argues that since "the mass emission benchmarks… do not exceed the water quality objectives for the receiving water, the increase of any mass emission benchmarks is not expected to result in additional degradation" and that "benchmarks are an additional incentive for the Discharger to maintain the current treatment quality" (Tentative Permit, Pg. 165). However, the Tentative Permit does not explain how these benchmarks will help to ensure that effluent water quality will not backslide or cause degradation of receiving water quality, since it also states that mass emissions benchmarks are based on performance, rather than health risk, and that "benchmarks for some constituents have increased" (Tentative Permit, Pg. 165). In fact, it appears that the performance goals provide an open invitation for the discharger to violate Ocean Plan water quality objectives: "If the exceedance persists in three successive monitoring periods, the Discharger shall submit a written report to the Regional Water Board on the nature of the exceedance, the results of the investigation as to the cause of the exceedance, and the corrective actions taken or proposed corrective measures with timetable for implementation, if necessary" (Tentative Permit,	Mass Emission Benchmarks as well as Performance Goals are included to encourage consistent treatment performance and maintain efficiency. Performance Goals and Mass Emission Benchmarks are only assigned to a pollutant if the pollutant did not have reasonable potential to exceed the water quality objectives during the preceding permit term, so the calculated Performance Goals and Mass Emission Benchmarks are always more stringent than the water quality objectives. As a result, an exceedance of a Performance Goal or Mass Emission Benchmark does not automatically indicate that there was an exceedance of the water quality objectives. In addition, since Mass Emission Benchmarks and Performance Goals are based on performance and performance may be impacted by many different factors (aging equipment, increased pollutant loads, maintenance schedules, etc.), it is expected that these values will increase or decrease as they are calculated every 5 years, but these values will always be below the water quality objectives, otherwise it will trigger reasonable potential and an effluent limitation for the pollutant would be included in the permit.	None necessary.

	Pg. F-51). If the Permittee exceeds a benchmark every other monitoring period, the Tentative Permit seemingly would not require the same investigation and corrective actions. Thus, under the Tentative Permit as written, the discharger may be exceeding Ocean Plan water quality objectives repeatedly without being held accountable. We urge the Regional Board to replace the benchmarks associated with discharge points 001 and 002 with enforceable effluent limits. At a minimum, we urge the Board to strengthen the benchmark trigger to ensure accountability by requiring reporting, investigation, and corrective action with any single benchmark exceedance.	This is consistent with the antidegradation policy because Mass Emission Benchmarks and Performance Goals encourage the Discharger to meet more stringent water quality requirements by requiring additional investigations if there are changes to the performance of the facility. No additional degradation is expected if the Discharger continues to closely monitor the treatment plant performance and investigates the cause of any excursions above the Mass Emission Benchmarks or Performance Goals because the water quality will continue to meet the water quality objectives, otherwise effluent limitations will be assigned to the discharge. If the Discharger does exceed the water quality objectives for any pollutant, Section 7.3.1. of the Tentative Order allows the Los Angeles Water Board to reopen the permit at any time to include new effluent limitations based on future reasonable potential analyses that are required to be conducted by the Discharger and submitted to the Los Angeles Water Board annually (Section 10.4.4. of the MRP of the Tentative Order). The Tentative Order also only requires an investigation if a Performance Goal is exceeded in two consecutive monitoring periods to ensure an investigation is only conducted when there are consistent exceedances and the exceedance was not an anomaly. Since treatment plant performance	

		slightly varies over time, it is not necessary to initiate an investigation immediately following a single exceedance of the Performance Goal or Mass Emission Benchmark. Consistent exceedance of a Mass Emission Benchmark or a Performance Goal is a better indicator of changes to treatment plant performance because the exceedance would be detected for an extended period of time.	
B3	**The Tentative Permit should include a detailed spill reporting protocol.** The Regional Board must enforce the sewage spill reporting requirements within the Tentative Permit, and the Board must enhance those reporting requirements where necessary to ensure timely and adequate public notice of spills. We offer the following examples of how spill-reporting requirements must be improved within the Tentative Permit, including the following actions: • In general, the Regional Board should require facility preparation to ensure adequate protection against high flow events, as a provision of the Tentative Permits and as a consideration within Climate Change Effects Vulnerability Assessment and Mitigation Plan. • The Tentative Permit should include the general public under the list of interested persons to be notified in the event of a spill (via sign posting, social media, and/or any other outreach tools that the permittee prefers), and notification of all interested persons must occur as soon as	• <u>Climate Change Plan</u> Section 7.1.2.c. of the Tentative Order already requires the Discharger to adequately protect all its facilities used for collection, transport, treatment, or disposal of wastes against damage resulting from overflow, washout, or inundation from a storm or flood having a 1-percent chance of occurring in a 24-hour period in any given year. The Tentative Order does not specify how the Discharger must achieve such protection because the Los Angeles Water Board is prohibited from specifying the manner of compliance per section 13360 of the California Water Code. In addition to this permit requirement, the Climate Change Plan required in section 7.3.4.b. of the Tentative Order also already requires the Discharger to identify new or increased threats to the sewer system resulting from climate change and the projected upgrades to the existing assets or new infrastructure projects, which although	None necessary.

	possible, but not later than two hours after becoming aware of the release. • The Tentative Permit should also include requirements for routine maintenance and operational testing of nonemergency infrastructure as well as emergency infrastructure. • In the event of a spill, the Regional Board should require immediate implementation of accelerated monitoring for spills of a certain size, without the need for Regional Board instruction. This monitoring should include the use of rapid fecal indicator bacteria testing, modeling and measurements of currents to predict plume pathway, and additional ambient monitoring where any sewage was released. The Tentative Permit should, therefore, identify a spill volume significant enough to require immediate accelerated monitoring, and include an accelerated monitoring plan that can be amended as necessary in the event of a spill, but provides initial guidance to allow implementation of monitoring immediately following a spill event, given safe monitoring conditions. • Further, shoreline monitoring should be included in all "geographical extent" monitoring post spill to ensure public health is protected.	not specifically identified, includes protection against high flow events. • Spill Reporting The Los Angeles Water Board agrees that the public needs to be notified as soon as possible following the release of reportable amounts of hazardous substances or sewage for the protection of public health. As such, individuals of the general public have the option of requesting spill notification from the Discharger to be included in the email list of interested persons. In addition, Section 7.3.6.a.ii of the tentative Order already requires the Discharger to include public outreach in its emergency communications protocols, which may include media updates, social media postings, and community notices. • Routine Maintenance Section 1.4 of Attachment D of the Tentative Order already requires the Discharger to properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Discharger to achieve compliance with the conditions of the Order. This section encompasses all non-emergency infrastructure in addition to emergency infrastructure. In addition, Section 7.3.4.d. of the Tentative Order is a more prescriptive requirement, requiring the	

		monthly maintenance and operational testing for all emergency infrastructure and equipment at the JWPCP, since emergency infrastructure may not be in operation on a regular basis. Since non-emergency infrastructure is used more regularly, maintenance may need to occur more or less frequently depending on the equipment. • Spill Monitoring Section 7.3.6.b of the Tentative Order already includes requirements for the Discharger to take actions to define the geographical extent of the spill's impact and to conduct immediate additional monitoring for ***all*** volumes of spills, overflows, and bypasses. If receiving water monitoring suggests the spill's impact reaches the shoreline, the Discharger is required to obtain grab samples at those shoreline locations to define the geographical extent of the spill's impact. The Discharger is also required to analyze the samples for total coliform, fecal coliform, *E. coli* (if fecal coliform tests positive), *Enterococcus*, and relevant pollutants of concern, upstream and downstream of the point of entry of the spill (if feasible, accessible, and safe). Rapid fecal monitoring is also identified as the preferred method of monitoring, but only if an ELAP-certified lab is available to conduct the analyses to ensure quality of the results as required in California Water Code section	

		13176. This daily monitoring is required to be conducted from the time the spill is known until the results of two consecutive sets of bacteriological monitoring indicate the return to the background level or the County Department of Public Health authorizes cessation of monitoring. In addition, the Southern California Coastal Ocean Observing System monitors ocean currents in southern California using High Frequency Radar. This information is already used for oil response and recovery, U.S. Coast Guard search and rescue operations, water quality tracking, and monitoring marine protected areas. Since High Frequency Radar data is already available to monitor ocean currents, this data can be used to model a discharge plume when a spill occurs. Section 7.3.6.d. of the Tentative Order already requires an evaluation of the plume pathway using this high frequency radar data in the 30-day report following a spill.	
B4	**We urge the Regional Board to exercise its authority to prevent waste and unreasonable use of water.** The Joint Water Pollution Control Plant (JWPCP) is currently pursuing facility expansion to produce 150 million gallons per day of treated wastewater for beneficial reuse including replenishing groundwater basins, industrial uses, and eventually direct potable reuse. The California Constitution requires the state's water resources	The question of what the water boards "must" do with respect to waste and unreasonable use is the subject of ongoing litigation. As a practical matter, however, the Los Angeles Water Board strongly encourages water recycling, water conservation, and use of stormwater and dry-weather urban runoff, consistent with the Water Quality Control Policy for Recycled Water (Recycled Water Policy) and Resolution Nos. 2017-0012 and	None necessary.

	be put to beneficial use and that the waste or unreasonable use of water be prevented. In December of 2018, the State Board adopted its revised Recycled Water Policy with the goal to recycle all dry-weather ocean wastewater discharges statewide. Locally, former Mayor Garcetti announced a goal for the City of Los Angeles to recycle 100% of its wastewater by 2035 to increase the amount of water we source locally. Therefore, the reuse of recycled water should remain the priority for JWPCP to increase local resilience through smart water practices. We support the efforts made towards recycled water reuse at the JWPCP facility and elsewhere in the region, but regional coordination is key to maximize the opportunity for wastewater recycling and minimize costs. Additionally, the Regional Board must exercise its authority to prevent waste and unreasonable use of water by conducting a waste and unreasonable use analysis in the Tentative Permit.	R18-004 that the Los Angeles Water Board and State Water Board have adopted on these subjects – recycling, climate change, etc. The current Order requires the Discharger to evaluate the feasibility of recycling, conservation, and/or alternative disposal methods of wastewater, and/or capture and treatment of dry weather urban runoff and stormwater. The Tentative Order carries over this requirement in section 4.3. Section 2.1.3 of the Fact Sheet of the Tentative Order also briefly discusses the Discharger's future plans for reusing the treated effluent. The Tentative Order describes the recycled water project of the Advanced Water Treatment Facility (AWTF) that will be constructed at the JWPCP. The AWTF will produce 100 million gallons per day (MGD) [112,000 acre-feet per year (AFY)] and 150 MGD (168,000 AFY) of purified water in 2032 and 2036, respectively. This highly purified water will be recharged at the Central, West Coast, Main San Gabriel, and Orange County Groundwater Basins.	
B5	**The Regional Board must ensure that the CIWQS is up to date and fully reflected in the Tentative Permit Compliance Summary.** The compliance summary in the Fact Sheet of the Tentative Permit states that there were no exceedances of effluent limitations during the permit term. There were deficient monitoring violations, and we appreciate the corrective action	The 09/27/2019 BMP violation is associated with the *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Order No. 2009-0009-DWQ) and is not related to the effluent discharged from the JWPCP in compliance with NPDES No. CA0053813. All violations reported in CIWQS for NPDES No.	None necessary.

	taken by the discharger that have addressed these issues. There was one violation listed on CIWQS that was not addressed in the Compliance Summary for "Deficient BMP Implementation / BMP Failure" on 09/27/2019 with no listed corrective action. We request that Regional Board staff explain this violation and any corrective action taken in the Compliance Summary. There are also multiple entries for this facility on CIWQS (see screenshot below), most of which do not contain any data, but which does add confusion for web users. We request that the Regional Board maintain CIWQS to ensure a user-friendly experience.	CA0053813 have been summarized in the Compliance Summary in section 2,4 of the Fact Sheet of the Tentative Order.	

Comment Letter dated May 1, 2023 from the Los Angeles Waterkeeper

#	Comments	Response	Action Taken
C1	The tentative permit is subject to Chapter 1 of CEQA and should include findings as to whether or not the project has significant and unavoidable impacts. If applicable, it should identify feasible alternatives or mitigation measures that would substantially lessen those impacts. Such an analysis will ensure that permitting decisions made now will make important progress toward maximizing wastewater recycling in the Los Angeles region. The LA Water Board didn't consider the potential environmental impacts of discharging millions of gallons of treated wastewater into the ocean everyday.	Title 23 of the California Code of Regulations (CCR) specifically addresses CEQA as it relates to waste discharge requirements that serve as NPDES permits. Section 3733 of Title 23 of the CCR states: "In accordance with Water Code section 13389, the boards shall not be required to comply with CEQA prior to the adoption of waste discharge requirements that serve as a National Pollutant Discharge Elimination System (NPDES) permit pursuant to	None necessary.

#	Comments	Response	Action Taken
		Water Code section 13377, except for new sources as defined in Title 40, Code of Federal Regulations, sections 122.2 and 122.29." New source is defined in sections 122.2 and 122.29 of Title 40 of the Code of Federal Regulations as: "any building, structure, facility or installation from which there is or may be a "discharge of pollutants," the construction of which commenced: (a) After promulgation of standards of performance under section 306 of CWA which are applicable to such source, or (b) After proposal of standards of performance in accordance with section 306 of CWA which are applicable to such source, but only if the standards are promulgated in accordance with section 306 within 120 days of their proposal." In addition, under California Water Code section 13389, the action to adopt an NPDES permit is exempt from the provisions of Chapter 3 of CEQA, which states: "Neither the state board nor the regional boards shall be required to	

#	Comments	Response	Action Taken
		comply with the provisions of chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code prior to the adoption of any waste discharge requirement, except requirements for new sources as defined in the Federal Water Pollution Control Act or acts amendatory thereof or supplementary thereto." The Federal Water Pollution Control Act defines new sources as: "any building, structure, facility or installation from which there is or may be the discharge of pollutants, the construction of which commenced after the publication of proposed regulations prescribing a standard of performance under this section which will be applicable to such sources, if such standard is thereafter promulgated in accordance with this section." Since the JWPCP is not considered a new source, the action to adopt the NPDES permit is exempt from Chapter 3 of CEQA according to California Water Code section 13389. Although Chapter 3 of CEQA only applies to the preparation of an EIR, section 13389 of the California Water Code further	

#	Comments	Response	Action Taken
		supports that this action is exempt from CEQA. Title 14 of the CCR section 15307 also states that actions taken by regulatory agencies as authorized by state law or local ordinance to assure the maintenance, restoration or enhancement of the environment where the regulatory process involves procedures for the protection of the environment are exempt from CEQA. Issuance of this Tentative Order is considered such an action and is thereby exempt from CEQA in Title 14 of the CCR. Furthermore, the California Environmental Quality Act defines a project as “an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment…”. The JWPCP is currently discharging secondary-treated water to the Santa Monica Bay under the current permit and has been discharging for years under previous permits. The renewal of the permit to allow continued discharge would not cause a direct or indirect physical change to the Santa Monica Bay.	

Comment Letter dated May 1, 2023 from the Los Angeles Waterkeeper and Heal the Bay

No.	Comment	Response	Action Taken
D1	The Tentative Permit continues the basic flaw of the prior permit authorization of an enormous discharge of water to convey waste without any consideration of whether that use of water is reasonable or wasteful, as required by the California Constitution and state law. We urge these agencies to collaborate now to conduct the required waste and unreasonable use analysis as part of the Tentative Permit, and to impose permit conditions to ensure that the use of water at JWPCP whether recycled and reused or discharged is reasonable and not wasteful.	See response to comment B4.	None necessary.