



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE
Chief Engineer and General Manager

April 18, 2019

File No. 98-50.15B SI

Ms. Renee Purdy, Executive Officer
California Regional Water Quality Control Board - Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Dear Ms. Renee Purdy:

Comments on Tentative Waste Discharge Requirements (WDRs) and National Pollutant Discharge Elimination System (NPDES) Permit for the Joint Outfall System, White Point Outfall Manifold Construction Dewatering Project Discharge to the Pacific Ocean NPDES No. CA0064661

The Joint Outfall System¹ (Sanitation Districts) appreciates the opportunity to provide comments on the Tentative Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) Permit (Tentative Permit) for the Joint Outfall System, White Point Outfall Manifold Construction Dewatering Project (Dewatering Project). The Sanitation Districts thank the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) staff for their assistance throughout the permit renewal process, and request modification of the Tentative Permit based on the two comments below.

Incorporate Two Mixing Events into Calculation of the Dilution Factor

The Sanitation Districts request consistency with the NPDES permit for the Juanita Millender-McDonald Carson Regional Water Recycling Plant (Carson Plant, Order No. R4-2018-0090), which also discharges to the Joint Water Pollution Control Plant (JWPCP) outfalls. Section IV.C.5 of the Fact Sheet of the Carson Plant permit clearly states that there are two mixing events (with dilution ratios for each event shown in Table F-2):

“Brine from the Facility undergoes two mixing events before it is discharged to the Pacific Ocean. The first mixing event occurs when the effluent from the Facility combines with effluent from Joint Water Pollution Control Plant (JWPCP). The second mixing event occurs during the actual discharge to the Pacific Ocean through the diffuser on the ocean outfall. Because the effluent from the Facility undergoes two mixing events during its discharge, both mixing events must be considered when determining reasonable potential and developing an effluent limitation.”

¹ Ownership and operation of the Joint Outfall System is proportionally shared among the signatory parties to the amended Joint Outfall Agreement effective July 1, 1995. These parties include County Sanitation Districts of Los Angeles County Nos. 1, 2, 3, 5, 8, 15, 16, 17, 18, 19, 21, 22, 23, 28, 29, and 34, and South Bay Cities Sanitation District of Los Angeles County.
DM #5008365

The Dewatering Project Tentative Permit considers only the second mixing event. However, both the Dewatering Project groundwater flow and brine from the Carson Plant are added to the JWPCP effluent prior to discharge from the outfalls and undergo the same two mixing events; therefore, it would be appropriate for the Dewatering Project Tentative Permit to apply the same dilution calculation methods, and to use similar language. Specifically, the Sanitation Districts request revision of the dilution value throughout the permit, including its use in the determination of the IWC in toxicity testing and in the RPA calculations. The table below highlights several sections of the Dewatering Project Tentative Permit that would need to be amended:

Page No.	Section	Tentative Draft Statement
15	VII.J	"Chronic toxicity for the discharge is evaluated at the IWC (0.60% effluent for Discharge Points 001 and 002)..."
E-8	MRP V.A.1	"The chronic toxicity IWC for Discharge Points...is 0.60 percent effluent."
F-18	Fact Sheet IV.C.2	"this order applies the same minimum probable initial dilution of 166:1 for discharges..."
F-19	Fact Sheet IV.C.3	"As discussed in section IV.C.2 of the Fact Sheet, this Order is incorporating a minimum probable initial dilution (D_m) of 166:1 for discharges through Discharge Points 001 and 002, consistent with the NPDES permit Order No. R4-2017-0180 for JWPCP. This D_m value for Discharge Points 001 and 002 is applied to the RPA and WQBELs established herein."

The Sanitation Districts also request two additions to the Fact Sheet:

- Section IV.C.4: Add relevant text from IV.C.5 of the Fact Sheet of the Carson Plant permit ("Brine from the Facility undergoes two mixing events...").
- Section I: Add a section on dilution credits, similar to Section I.F of the Carson Plant permit. Dilution ratios and groundwater percentages for the Dewatering Project are shown in the table below, assuming an estimated maximum Dewatering Project flow of 1.44 million gallons per day (MGD) and the combined flows from the JWPCP and the Carson Plant.

Flow	Parameter	Dilution Ratio*	Percentage Groundwater in Mixture
JWPCP Average design dry weather flow in 1997 (385 MGD) + Carson Plant design flow (1.2 MGD)	First Dilution: Dewatering flow combines with JWPCP secondary effluent + Carson Plant flow	1.44 MGD : 386.2 MGD (Total = 387.64 MGD)	0.37%
	Second Dilution: Combined outfall flow enters Pacific Ocean	1.44 MGD : [387.64 x (166+1)] = 1 : 45,000	0.0022%
JWPCP Minimum flow, 2014-2018 (239 MGD) + Carson Plant design flow (1.2 MGD)	First Dilution: Dewatering flow combines with JWPCP secondary effluent + Carson Plant flow	1.44 MGD : 240.2 MGD (Total = 241.64 MGD)	0.60%
	Second Dilution: Combined outfall flow enters Pacific Ocean	1.44 MGD : [241.64 x (166+1)] = 1 : 28,000	0.0036%

*Dilution ratio of 166:1 used in the second dilution calculation is consistent with the JWPCP permit and applies to Outfalls 001 and 002.

Allow Use of the JWPCP Most Sensitive Species for Toxicity Testing

The Tentative Permit specifies that a three species sensitivity screening for toxicity be conducted once every five years, to determine the most sensitive species, i.e., the species used for routine toxicity testing. The Sanitation Districts request the ability to use the species determined to be most sensitive under the JWPCP permit through their biennial species sensitivity screening, rather than conducting a separate screening test that includes the dewatering discharge. The dewatering discharge consists of groundwater and is relatively clean, as evidenced by the water quality analysis: the results met all California Ocean Plan Objectives, as well as the general permit limitations for all parameters except cyanide, which exceeded the objective of 1 µg/L in one of five groundwater samples (with concentrations of 1.1, 0.89, and 0.5 µg/L, and two non-detect results). In addition, as shown in the table above, the contribution of the dewatering flow to the outfall discharge is quite small (at most 0.0036% after both dilution events). In a 1,000 mL toxicity test, 0.036 mL of groundwater would be used; it seems highly unlikely that this very small amount of clean water would affect the results of the toxicity screening. Consequently, the Sanitation Districts request that the Dewatering Project permit specify use of the same species as the JWPCP for toxicity testing; conducting separate screening tests that include the dewatering water is unlikely to add significant value relative to the substantial cost of the screen (approximately \$18,000).

The Sanitation Districts thank you for your consideration of these comments. If you have any questions concerning this letter or need additional information, please contact Naoko Munakata at (562) 908-4288, extension 2830.

Very truly yours,



Naoko Munakata
Supervising Engineer
Reuse and Compliance Section

NM:RY:ep

cc: Cris Morris, Cassandra Owens, Ching Yin-To, CRWQCB – LA Region