

Response to Comments

Los Angeles County Sanitation Districts Joint Outfall System (JOS)

Los Coyotes Water Reclamation Plant (Los Coyotes WRP)

Tentative Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit

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

Comments of significance received from LACSD on November 8, 2021			
#	Comment	Response	Action Taken
1	<p>Throughout the Tentative Order: <i>Request to change most sensitive species throughout permit to reflect most recent screening results. Sections and pages listed in Attachment 2 (see section 15-07).</i></p> <p>The Sanitation Districts respectfully request that the Regional Board modify the Tentative Permit to specify that chronic toxicity limits be based on the current most sensitive species, <i>Pimephales promelas</i> (fathead minnows). Attachment 2 includes a list of occurrences throughout the permit where this change would be made.</p> <p>Chronic Toxicity effluent limitations are specified in the WDR and are currently based upon <i>Ceriodaphnia dubia</i> survival and reproduction endpoints. Section V.A.4 of the current 2015 Los Coyotes Water Reclamation Plant Monitoring and Reporting Program (MRP) specifies that species sensitivity rescreening is required every 24-months. Three valid suites of testing were completed in October 2021 using Los Coyotes WRP final effluent. Based on the results of these screens, <i>Pimephales promelas</i> (fathead minnows) were</p>	<p>The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) agrees to revise the most sensitive species for chronic toxicity testing to <i>Pimephales promelas</i> with the survival and growth endpoints.</p>	<p>Revisions have been made to the Revised Tentative Order.</p>

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	identified as the most sensitive species. Complete results for the sensitive species screening are tabulated in Attachment 3, with the most sensitive species of each valid suite highlighted.		
2	<p>Monitoring and Reporting Program (MRP), section 5.4, Page E-14.</p> <p>This section states “<i>The Permittee shall begin a species sensitivity screening for chronic aquatic toxicity within 18 months after the effective date of the Order...</i>”</p> <p>The Sanitation Districts respectfully request that the Regional Board modify this statement so that a species sensitivity screening for chronic aquatic toxicity may begin 18 months prior to the expiration date of the permit. The proposed revision to the date for the species sensitivity screening would allow more time to pass between screening events, while still allowing enough time to revise the most sensitive species, if necessary, in the next permit cycle.</p>	The Los Angeles Water Board agrees to revise the requirements for chronic toxicity species sensitivity screening so that a species sensitivity screening for chronic aquatic toxicity may begin 18 months prior to the expiration date of the permit.	Revisions have been made in the Revised Tentative Order
3	<p>MRP, Table E-3 and Table E-5 (pages E-10 and E-20)</p> <p><i>The Sanitation Districts request that the sample type for Organic Nitrogen be changed to “calculation.” The value for Organic Nitrogen is calculated by subtracting the ammonia result from the Total Kjeldahl Nitrogen (TKN).</i></p>	The Los Angeles Water Board agrees to revise the sample type for organic nitrogen to “calculated” in Table E-3 and Table E-5.	Revisions have been made in the Revised Tentative Order.