

Response to Comments

Newhall Ranch Sanitation District
Newhall Ranch Water Reclamation Plant (Newhall Ranch WRP)
Tentative Waste Discharge Requirements and NPDES Permit (dated January 16, 2019)

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

#	Comment	Response	Action Taken
Comments received from the Santa Clarita Valley Sanitation District who is staff to Newhall Ranch Sanitation District – Cover letter dated February 15, 2019			
1	<p>Page 7, Section IV.A.1.a, Table 4-Effluent Limitations:</p> <p><i>The Average Monthly Effluent Limitation (AMEL) for Mercury is listed as an annual average concentration of 0.012 ug/L, with a corresponding mass emission rate of 0.0002 pounds per day (lbs/day).</i></p> <p>The 2018 State mercury provisions stipulate that "A water quality-based effluent limitation is not required unless the highest observed annual effluent concentration is greater than C [the lowest (most stringent) mercury water quality objective applicable to the receiving water]."1 Per Table F-7, the highest observed annual average effluent mercury concentration at the Valencia WRP was less than C.</p> <p>The 2018 mercury provisions then stipulate that "if B [the highest observed annual average ambient background concentration] is greater than C, and mercury is detected in the effluent, effluent monitoring is required."1 Per Table F-7, B was greater than C and mercury was detected in the Valencia WRP effluent.</p> <p>Therefore, SCVSD requests that the mercury final effluent limitation be removed from Table 4 and that only monitoring requirements for mercury remain in the Monitoring and Reporting Program.</p>	<p>The Regional Water Board agrees to remove the WQBEL for mercury to be consistent with the reasonable potential procedures established in the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California (ISWEBE Plan), which differs slightly from the RPA procedure that had been established by the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (State Implementation Policy or SIP) for the implementation of the California Toxics Rule criteria. When implementing the ISWEBE Plan, an exceedance of the mercury water quality objective in the receiving water does not trigger the need for a final water quality-based effluent limitation. Therefore, an effluent limitation based on the ISWEBE Plan's mercury provisions is not required for the Newhall Ranch WRP.</p>	<p>Deleted the mercury final effluent limitations from the tentative permit.</p>

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2	<p>Page 21, Section VI.C.6.a.ii (Initial Notification):</p> <p>SCVSD requests that the following sentence be deleted: "In addition, the Permittee shall notify Heal the Bay of any such sewage spill" because they believe that requiring notification to a specific non-governmental organization is an inefficient use of limited resources that would be better spent on handling the spill and the many essential reporting requirements already specified in the permit. SCVSD is currently working to add Heal the Bay to its Spill Notification List.</p> <p>Heal the Bay is not a first responder, does not have the same mandate to protect public health, and already has access to spill information through the California Office of Emergency Services. Moreover, the Sanitation Districts already has a system in place that notifies relevant parties of spills reported to our Spill Hotline. Because these notifications include spills that are not the responsibility of the Sanitation Districts, use of this system would likely be more informative to Heal the Bay, while being less onerous to the Sanitation Districts. Consequently, the Sanitation Districts reached out to a Heal the Bay representative, who indicated that the process proposed here will meet their needs.</p>	The Regional Water Board agrees to remove the notification requirement from the NPDES permit since Newhall Ranch SD will still convey the spill information to multiple agencies, including the California Office of Emergency Services, which is the appropriate agency for centralized spill reporting. Additionally, Heal the Bay will be added to the Discharger's spill notification list.	Deleted language from the tentative permit.
Comments received from the Santa Clarita Valley Sanitation District who is staff to Newhall Ranch Sanitation District - ATTACHMENT 1			
A.1	<p>Table 4, Page 7, superscript 2</p> <p>SCVSD request that the superscript "2" be changed to "1", e.g. lbs/day¹ for Bis(2-ethylhexyl) phthalate; Iron; Total Trihalomethanes; and 2,3,7,8-TCDD.</p>	The correction will be made.	The correction was made.
A.2	<p>Section IV.C, Page 8</p> <p>SCVSD request that the following language:</p>	The change will be made.	The language was

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	<p>"The Discharger plans to use up to 478 acre-feet per month (February through November) and up to 340 acre-feet per month (December and January) of tertiary-treated effluent for landscape irrigation and other uses"</p> <p>be replaced with the following alternative language:</p> <p>"The Discharger plans to maximize the use of tertiary-treated effluent for landscape irrigation and other uses."</p>		modified as requested.
A.3	<p>Section IV.C, page 8</p> <p>SCVSD request that the "Valencia Water Company" should be replaced with "the Santa Clarita Valley Water Agency."</p>	The change will be made.	The language was modified as requested.
A.4	<p>Section VI.C.5.a – Biosolids Disposal, page 18</p> <p>SCVSD request that, as in the existing permit, the Biosolids section be labeled as "(NOT APPLICABLE)."</p>	The change will be made.	The language was modified as requested.
A.5	<p>Table E-2, Lindane, MRP page E-7</p> <p>SCVSD request that the minimum sampling frequency be adjusted to quarterly to reflect the removal of the lindane effluent limit.</p>	The change will be made.	The language was modified as requested.
A.6	<p>Table E-5, MRP page E-19</p> <p>SCVSD request that the units for Algal biomass (chlorophyll a) be changed from mg/L to mg/cm².</p>	The change will be made.	The language was modified as requested.
A.7	<p>Table E-5, Footnote 27, MRP page E-20</p>	The change will be made.	The language

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	SCVSD request that the reference to receiving water locations RSW-003 through RSW-005 be removed since they do not exist for this facility.		was modified as requested.
A.8	<p>Sections VIII.A.5 and VIII.A.6, MRP page E-21</p> <p>SCVSD request that the language in section VIII.A.6 be removed since there is no weekly receiving water frequency of sampling, and that Section VII.A.5 be modified as follows:</p> <p>"Receiving water samples shall not be taken during or within 48-hours following the flow of rainwater runoff into the Santa Clara River or during adverse flow conditions, unless it is safe to do so."</p>	The change will be made.	The language was modified as requested.
A.9	<p>Table E-7, CEC Monitoring, MRP page E-23</p> <p>SCVSD request that the column heading "Analytical Method" be replaced with "Compound class" since compound class is a more fitting description for the category of CEC pollutant.</p>	The change will be made.	The language was modified as requested.
A.10	<p>Section I.A.2, Fact Sheet page F-5</p> <p>SCVSD request that the month and year be added to reflect that SCVSD replaced LADWP as staff to Newhall Ranch SD in March 2014.</p>	The change will be made.	The language was modified as requested.
A.11	<p>Section I.A.3.d, Fact Sheet page F-5</p> <p>SCVSD request that the following language:</p> <p>"Any necessary pipelines to convey the brine waste stream from Interim Demineralization Facility to the deep-well injection system and the injection system itself, which will be permitted under a separate USEPA-issued Class I Non-hazardous Underground Injection Control (UIC) permit."</p>	The change will be made.	The language was modified as requested.

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	be replaced with the following to reflect consideration of multiple alternative disposal options: "Any infrastructure necessary to dispose of the brine waste stream."		
A.12	Section I.A.3., Fact Sheet page F-5 SCVSD request that the word brine be inserted to define the waste stream, as follows: "The concentrate waste stream (<u>brine</u>) is expected to be disposed of by either trucking it offsite, or in offsite injection wells."	The change will be made.	The language was modified as requested.
A.13	Section II.A.1., Fact Sheet page F-5 SCVSD request that the word "may" replace the word "will" to describe the intermittent discharge of wastewater from Discharge Point 001 to the Santa Clara River.	The change will be made.	The language was modified as requested.
A-14	Section II.A.2., Fact Sheet pages F-7 and F-8 SCVSD request that the entire section describing the treatment system be deleted because the level of detail was not included in the 2013 Order and the plant design has not been finalized yet.	The Regional Water Board disagrees with the removal of the description of the treatment system for the Newhall Ranch WRP. As the fact sheet states on page F-7, the language is a "brief description of the major unit processes, operations, and or equipment, based on the ROWD submittal and the Preliminary Design Report prepared by CH2MHill in 2003" for the Newhall Ranch WRP. If the design for the Newhall Ranch WRP is modified at a later date, then Newhall Ranch SD can submit the final design at that time.	None necessary.
A-15	Section II.B.1, Fact Sheet page F-8 SCVSD request that the language describing its plans for recycling tertiary treated effluent be modified as follows: "Newhall Ranch SD plans on applying for separate Water Reclamation Requirements to recycle tertiary treated effluent."	The change will be made.	The language was modified as requested.

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A-16	Section IV.C.2.b Fact Sheet page F-33 SCVSD request that the language describing reasonable potential for iron be modified to replace the phrase “cause to contribute” with “cause or contribute.”	The change will be made.	The language was modified as requested.
A-17	Table F-9, Fact Sheet page F-48 SCVSD request that the units for BOD be modified from “µg/L” to “mg/L.”	The change will be made.	The language was modified as requested.
A-18	Table F-10, Fact Sheet pages F-54 through F-56 Table F-10, Fact Sheet pages F-54 table heading “2018 Permit” be replaced with “2019 Permit”.	The correction will be made.	The language was modified as requested.
A-19	Table F-10, Fact Sheet page F-55 SCVSD request that the comparison of monitoring frequency between the 2013 Order and the 2019 tentative order be modified to reflect the quarterly monitoring frequency found in the tentative MRP section for: Antimony, Arsenic, Lead, Zinc, Acrylonitrile, p-dichlorobenzene, lindane (gamma-BHC), and 4,4-DDE.	The changes will be made to the comparison table. Nickel was also added at quarterly monitoring.	The language was modified as requested.
Comments received from the Santa Clarita Valley Sanitation District who is staff to Newhall Ranch Sanitation District - ATTACHMENT 2			
B-1	SCVSD submitted a Technical Report, dated February 15, 2019, in support of a Finding for Residential Salinity Control.	The Regional Water Board is in receipt of the technical report. No changes are necessary because the tentative order already contained a finding in section II.D. of the WDRs regarding self-regenerating water softeners.	None necessary.