



## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE  
Chief Engineer and General Manager

April 30, 2019  
File No. 36-01.02-55

***Via Electronic Mail***

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

Dear Ms. Purdy:

**Comments on Revised Tentative Waste Discharge Requirements (WDR) and  
National Pollutant Discharge Elimination System (NPDES) Permit for the  
Newhall Ranch Water Reclamation Plant, (NPDES No. CA0064556, CI No. 9322)**

The County Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to provide comments on the Revised Tentative Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) Permit (Revised Tentative Permit) for the Newhall Ranch Water Reclamation Plant (NRWRP). The Sanitation Districts also greatly appreciate the assistance from the Regional Water Quality Control Board, Los Angeles Region (Regional Board) staff in resolving our major concerns throughout the development of this permit; however, a few additional minor corrections are requested, as detailed in the attached table.

If you have any questions about this letter or require additional information, please contact the undersigned at (562) 908-4288, extension 2830.

Very truly yours,

Naoko Munakata  
Supervising Engineer  
Reuse and Compliance Section

NM:PN:nm  
Attachment

cc: Cris Morris, Jeong-Hee Lim, and Veronica Cuevas-Alpuche – LA Regional Board  
Matt Carpenter, Tom Mitchell – Newhall Land and Farming Company (Five Point Land, LLC)

Attachment 1 - Errata  
Comments on Revised Tentative NPDES Permit for NRWRP, (NPDES No. CA0064556, CI No. 9322)

Item	Page No.	Section	Existing Draft Language	Comment
1	16	Section VI.C.2.b	The Permittee shall prepare and submit a copy of the Permittee's initial investigation Toxicity Reduction Evaluation (TRE) workplan before May 31, 2023 (one year prior to the permit expiration date), in accordance with Monitoring and Reporting Program section V.A.6	Due to change in expiration date, change submittal date from "May 31, 2023" to "August 31, 2023"
2	E-15	Section V.A.6	he Permittee shall prepare and submit a copy of the Permittee's initial investigation Toxicity Reduction Evaluation (TRE) workplan before May 31, 2023 (one year prior to the permit expiration date),...	Due to change in expiration date, change submittal date from "May 31, 2023" to "August 31, 2023"
3	E-19	Table E-5	Algal biomass (Chlorophyll a) units are in mg/cm <sup>3</sup>	The units should be in mg/cm <sup>2</sup>
4	F-05	I.A.2	In March 2014, SCVSD replaced LADWP as staff to Newhall Ranch SD.	Replace "LADWP" with "LADPW"
5	F-44	Table F-8	Nitrate + Nitrite as N units are listed as µg/L.	The units should be in mg/L.
6	F-44	Table F-8	Nitrite as N units are listed as µg/L.	The units should be in mg/L.