

Response to Comments

Los Angeles County Sanitation Districts Joint Outfall System (JOS)

San Jose Creek Water Reclamation Plant (San Jose Creek 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 September 10, 2021			
#	Comment	Response	Action Taken
1	<p>Section 9.1.3, Page E-41:</p> <p>The section states (emphasis added in bold), “In coordination with the Los Angeles County Public Works and other interested stakeholders in the San Gabriel River Watershed, the Discharger shall conduct a bioassessment program annually in the spring/summer period (unless an alternate sampling period is approved by the Executive Officer) and include an analysis of the community structure of the instream macroinvertebrate assemblages, the community structure of the instream algal assemblages (benthic diatoms and soft-bodied algae), chlorophyll a and biomass for instream algae, and physical habitat assessment at the random monitoring stations designated by the San Gabriel River Watershed Monitoring Program. Over time, bioassessment monitoring will provide a measure of the physical condition of the water body and the integrity of its biological communities.”</p> <p>The Sanitation Districts respectfully request deleting the bolded language specifying algal assemblages as “benthic</p>	<p>The Los Angeles Regional Water Control Board (Los Angeles Water Board) agrees with the suggested language change to keep general descriptions for the instream algal assemblages to be monitored so that coordination and integration of monitoring programs can be maintained and run as efficiently as possible.</p>	<p>Revisions have been made to the Permit.</p>

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	<p>diatoms and soft-bodied algae.” The recommended language would be consistent with the recently adopted Pomona and Whittier Narrows permits and would maximize the ability of the San Gabriel Regional Monitoring Program (SGRRMP) to continue assessment of the ambient watershed conditions.</p> <p>The SGRRMP was developed in 2004 by a group of stakeholders representing major water quality permittees, regulatory and management agencies, and conservation groups. The objectives of the program are to increase awareness of issues at the watershed scale, and to improve the coordination and integration of monitoring efforts for both regulatory compliance and ambient watershed conditions. The SGRRMP works with their Technical Stakeholder Committee (TSG), as well as technical advisors (e.g., SCCWRP staff), and works to keep their monitoring program consistent with both the southern California Stormwater Monitoring Coalition (SMC) and the California Surface Water Ambient Monitoring Program (SWAMP). Based upon the dynamic nature of this program, the SMC, and SWAMP, we believe that specifying particular types of algae could hinder the program by requiring a regulatory action (e.g., permit amendment) each time the TSG opted to change the particular algal types in its instream assemblage monitoring.</p>		

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1	<p>Section 4.1.1.a. on Page 7:</p> <p>Although not listed in the table specifically, the limit for pH is listed in 4.1.1.c. Add "pH" so it reads: "...(temperature, residual chlorine, and pH measured at EFF-001X, EFF-001AX, EFF-001BX)"</p>	The Los Angeles Water Board agrees to include "pH" to add clarity since temperature, residual chlorine, and pH are measured at EFF-001X, EFF-001AX, and EFF-001BX.	The revision has been made to the permit.
2	<p>Table 6, footnote b; Table 7, footnote b; Table 8, footnote c; Table 9, footnote d on Pages 12, 13, 15, 18:</p> <p>Replace "flow" with "Maximum Daily Flow" as defined on page A-3 in the following language: "... when the flow in the San Gabriel River is greater than or equal to 260 cubic feet per second (cfs), measured at USGS flow gauging station 11087020, located above the Whittier Narrows dam."</p>	The Los Angeles Water Board agrees to clarify the language since "flow" can have multiple interpretations. The maximum daily flow means the maximum instantaneous flow of the day.	Revisions have been made to the permit.
3	<p>Section 4.1.2.a. on Page 13:</p> <p>Add "residual chlorine" so language reads: "...(temperature, residual chlorine, and pH measured at EFF-002X)"</p>	The Los Angeles Water Board agrees to add a correction since temperature, residual chlorine, and pH are measured at EFF-002X.	The revision has been made to the permit.
4	<p>Table 7 on Page 13:</p> <p>Change "Notes" column for Lead (wet weather) to reference footnote "b" instead of "a".</p>	The Los Angeles Water Board agrees to correct the table with the appropriate footnote.	Revisions have been made to the permit.
5	<p>Section 4.1.3.a. on Page 16:</p>	The Los Angeles Water Board agrees to include "pH" to add clarity since	The revision has been

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	Although not listed in the table specifically, the limit for pH is listed in 4.1.3.c. Add "pH" so language reads: "...(temperature, residual chlorine, and pH measured at EFF-003X)"	temperature, residual chlorine, and pH are measured at EFF-003X.	made to the permit.
6	Table 11 on Page 21: Add reference to footnote "a" in "Notes" column for lbs/day rows for TDS, chloride, sulfate, and boron.	The Los Angeles Water Board agrees to correct the table and include appropriate footnotes for the mass-based limitations.	The revision has been made to the permit.
7	Monitoring and Reporting Program, Attachment E, Section 1.2 on Page E-3: Request to add exception for field analyses as follows: "Pollutants, except those analyzed in the field, shall be analyzed using the analytical methods described in 40 CFR parts..." to be consistent with Whittier Narrows WRP and Pomona WRP NPDES permits.	The Los Angeles Water Board agrees to add the suggested language to align with other permits and to exempt field analyses from the requirement to use analytical methods in 40 CFR Part 136.	The revision has been made to the permit.
8	Monitoring and Reporting Program, Attachment E, Table E-2 on Page E-11: Request to change units from ug/L to pg/L for influent PCBs as Aroclors and PCBs as Congeners. The reported results for these parameters are small values that are easy to misread and are prone to decimal errors (entering the wrong number of zeroes after the decimal).	The Los Angeles Water Board agrees to change the units to help prevent errors in reporting.	The revision has been made to the permit.

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9	<p>Monitoring and Reporting Program, Attachment E, Tables E-3 through E-6 and E-8 on Pages E-14, E-18, E-22, E-27, and E-38:</p> <p>Change to "TCDD Equivalents" to clarify which compounds are required to be monitored.</p>	<p>The Los Angeles Water Board agrees to clarify the language. Although the effluent limitation is for 2,3,7,8-TCDD alone, TCDD Equivalents, which are 17 congeners that exhibit toxic effects similar to 2,3,7,8-TCDD, must also be monitored to assess the presence and amounts of the congeners being discharged.</p>	<p>The revision has been made to the permit.</p>
10	<p>Monitoring and Reporting Program, Attachment E, Tables E-4 through E-6 and E-8 footnotes n, m, and h on Pages E-20, E-25, E-29, E-40:</p> <p>Compliance with the dioxin limitation should be determined based on 2,3,7,8-TCDD only. Revise the last sentence to read:</p> <p>"TCDD equivalents concentration should be reported as the summation of the seventeen individual TEQs, or the following equation:..."</p>	<p>The Los Angeles Water Board agrees to clarify the language with a slight modification of the suggested language to be consistent with section 7.15. of the Order. The footnote will read (added language is underlined, deleted language is in strikethrough):</p> <p>"Compliance with the dioxin limitation shall be determined by <u>The Discharger shall report all measured values of individual congeners, including data qualifiers. TCDD equivalents concentration shall be reported as</u> the summation of the seventeen individual TEQs, or the following equation:"</p> <p>To add further clarification on TCDD compliance, the following language is added to section 7.15. of the Order on page 43:</p>	<p>The revision has been made to the permit.</p>

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		<p><u>“Compliance with the dioxin effluent limitation shall be determined based on 2,3,7,8-TCDD alone. However, TCDD equivalents shall be monitored and calculated using the following formula...”</u></p>	
11	<p>Monitoring and Reporting Program, Attachment E, Table E-5 on Page E-23:</p> <p>Change Table E-5 TCDD sample type to "24-hour Composite".</p>	<p>The Los Angeles Water Board agrees and has made the following revisions to the Permit:</p> <ol style="list-style-type: none"> 1. Revised the Sample Type of Parameter TCDD equivalents in Tables E-4, E-5, and E-6 to “grab <u>or 24-hour composite</u>”; 2. Revised the Sample Type of Parameter “Remaining EPA priority pollutants excluding asbestos” in Table E-2 to “24-hour composite; grab for VOCs, Cyanide, and grab or composite for bis(2-ethylhexyl)phthalate and <u>TCDD equivalents</u>”. 2. Revised footnote n for Table E-3 and footnote r for Tables E-4 through E-6 to be the following: “The 40 CFR Part 136 method for phthalate esters, including bis (2-ethylhexyl) phthalate, <u>and TCDD equivalents</u> requires samples to be collected 	<p>The revision has been made to the permit.</p>

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		in glass sample containers to avoid interference, which can lead to artifacts and/or elevated baselines in gas chromatograms. Sample collection must be done using glass sample containers for all phthalate esters, including bis (2-ethylhexyl) phthalate, and TCDD equivalents unless analytical methods for these pollutants in 40 CFR Part 136 specify that other means of sample collection are approved. Grab sample type is recommended, but an automatic sampler (composite sample) can be used to collect samples for all phthalate esters, including bis (2-ethylhexyl) phthalate, and TCDD equivalents as long as the sample bottles are glassware."	
12	Monitoring and Reporting Program, Attachment E, Table E-6 on Page E-28: Change Table E-6 TCDD sample type to "24-hour Composite".	The Los Angeles Water Board agrees to revise the table. Please see responses to comment #11 above.	The revision has been made to the permit.
13	Monitoring and Reporting Program, Attachment E, Section 8.1.1 on Page E-37: Suggest following clarification in bold: "Three samples are to be collected upstream of EFF-005 if	The Los Angeles Water Board agrees to clarify the language.	The revision has been made to the permit.

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	there is a discharge from either EFF-004 or EFF-005 during the permit term...."		
14	Monitoring and Reporting Program, Attachment E, Table E-8 on Page E-38: Change Total Nitrogen sample type method to "Calculated"	Since the total nitrogen is the sum of all nitrogen compounds, the Los Angeles Water Board agrees to change the sample type to "calculated."	The revision has been made to the permit.
15	Monitoring and Reporting Program, Attachment E, Section 10.2.2. on Page E-44: Revise (in bold) to be consistent with language from page E-5, Section 1.12: "If the Discharger monitors any pollutant more frequently than required by this Order, (other than for process/operational control, startup, research, or equipment testing) the results of this monitoring shall be included in the calculations and reporting of the data submitted in the SMR."	The Los Angeles Water Board agrees to add the suggested language, and the addition of this language is consistent with section 1.12 of the General Monitoring Provision in Attachment E.	The revision has been made to the permit.
16	Fact Sheet, Attachment F, Section 4.3.4 on Page F-56: The last sentence of the second to last paragraph "...for lead, selenium, copper, arsenic, benzo(a)pyrene, dieldrin, and cyanide." is incomplete. Add 2,3,7,8-TCDD and heptachlor to the list.	The Los Angeles Water Board agrees to make the correction.	The revision has been made to the permit.

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17	<p>Fact Sheet, Attachment F, Section 7.2. on Page F-101:</p> <p>Revise to reflect RPA results: "... dieldrin (reasonable potential for discharge points 002, 003, 004, and 005), and heptachlor and 2,3,7,8-TCDD (reasonable potential for discharge points 003, 004, and 005). The monitoring frequency for these constituents has increased to monthly."</p>	<p>The Los Angeles Water Board agrees to make the correction with the following language:</p> <p>"...benzo(a)pyrene (reasonable potential for discharge points <u>001,001A, 001B, and 002</u>), and dieldrin (<u>reasonable potential for all discharge points</u>), <u>and</u> heptachlor , and 2,3,7,8-TCDD (reasonable potential for discharge points <u>001, 001A, 001B, 002, 003, 004, and 005</u>)."</p>	<p>The revision has been made to the permit.</p>
18	<p>Various pages in the Order and Attachment E:</p> <p>Requested minor edits such as spacing between text or paragraphs, orphaned headers, section reference typo.</p>	<p>The Los Angeles Water Board agrees to make the corrections.</p>	<p>The revisions have been made to the permit.</p>