

**RESPONSE TO COMMENTS
SANTA CLARITA VALLEY SANITATION DISTRICT
VALENCIA WATER RECLAMATION PLANT
TENTATIVE ORDER NO. R4-2022-XXXX
NPDES NO. CA0054216**

Comment Letter dated April 18, 2022, from Santa Clarita Valley Sanitation District (SCVSD)

No.	Comment	Response	Action Taken
D1	<p>The Santa Clarita Valley Sanitation District (Sanitation District) appreciates the opportunity to provide comments on the Tentative Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) Permit (Tentative Permit) for the Saugus Water Reclamation Plant (Saugus WRP) and the Valencia Water Reclamation Plant (Valencia WRP), dated March 2022. Additionally, we appreciate the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) staff sharing comment letters received to date for the tentative permits for Saugus and Valencia WRPs. We are reviewing these letters and will submit a detailed response to the Regional Board by April 25th. We hereby request that our response to these letters be included in the administrative record for the permits.</p>	<p>The deadline for submitting written comments was April 18, 2022. The letter seeks to incorporate by reference a future response to other comment letters, and proposes to submit that future response on April 25, a week after the comment deadline. The decision to accept late comments is at the discretion of the Board Chair, but typically the Los Angeles Water Board does not accept late comments to prevent surprise, avoid an undue burden on Los Angeles Water Board, and as a matter of fairness to all parties. All parties may address the concerns of other commenters in oral comments at the Board hearing when the draft permit will be considered. This response to comments will therefore not respond to that future response.</p>	None necessary.
D2	<p>The Sanitation Districts greatly appreciate the effort and cooperation shown by the Regional Board staff in this permit renewal process. The Sanitation Districts also appreciate the inclusion of a 10-year compliance schedule in the Tentative Permits which are</p>	Comment noted.	None necessary.

Response to Comments
Valencia WRP

No.	Comment	Response	Action Taken
	<p>necessary to allow us to meet the newly interpreted temperature limitations in our effluent discharge and receiving waters. This timeframe is the shortest time possible for the Sanitation Districts to undertake significant study, planning, environmental review, design, construction and financing to comply with the new limitations and meet the localized needs of the environment. We look forward to working closely with the Regional Board and interested stakeholders throughout this study and compliance process.</p>		
D3	<p>On April 12, 2022, we provided a quarterly update to the Regional Board that provides an update on our chloride compliance project construction efforts including optimization of UV facilities (Attachment 3). We are in compliance with Time Schedule Orders (TSOs) R4-2019-0055-A02 (Valencia WRP) and R4-2019-0056-A02 (Saugus WRP) and are on track to complete the project by the current deadline. We look forward to providing an update on our efforts to the Regional Board at the May 12th permit adoption hearing.</p>	<p>The Los Angeles Water Board has received and reviewed the quarterly progress TSO reports from SCVSD and concur that SCVSD has complied with the TSO milestones and is on track to completing the scheduled plant upgrades by December 31, 2022.</p>	<p>None necessary.</p>
D4	<p>Attachment C, Pages C-1 to C-12: Valencia WRP Process Diagrams</p> <p>Diagrams C1a through C6b show various process schematics to include upcoming changes at the Valencia WRP such as Advanced Water Treatment and Newhall Land and Farming Company's (NLF) chloride removal facilities. NLF plans to send reverse osmosis (RO) permeate from their Interim</p>	<p>The process flow diagrams will be revised as requested.</p>	<p>Removed former diagrams C3a, C3b, C5a, and C5b, replaced updated</p>

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	<p>Demineralization Facility (IDF) to the sewer. Because of this, Diagrams C3a, C3b, C5a, and C5b are no longer needed. In addition, the process diagrams were updated to better reflect plant operations and simplified titles. The Sanitation District requests removing Diagrams C3a, C3b, C5a, and C5b from the permit and to incorporate updated diagrams. A summary of these changes is included below and the updated diagrams are attached.</p> <ul style="list-style-type: none"> • Diagram C1a and C1b: The lines showing the optional/standby sodium hypochlorite, ammonia, and sodium bisulfite additions after the UV reactors were changed to dashed lines. An updated diagram is attached. • Diagram C2a and C2b: The lines showing the optional/ standby sodium hypochlorite, ammonia, and sodium bisulfite additions after the UV reactors were changed to dashed lines. In addition, the title was updated to “PROPOSED PROPOSED PROCESS SCHEMATIC – UV DISINFECTION WITH NLF INTERIM DEMINERALIZATION FACILITY (AT WRP ADJACENT SITE).” An updated diagram is attached. • Diagram C3a and C3b: These diagrams should be removed. NLFC plans to send RO permeate from their facility to the sewer only. • Diagram C4a and C4b: The lines showing the optional/standby sodium hypochlorite, 		<p>diagrams, and renumbered the remaining diagrams.</p>

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	<p>ammonia, and sodium bisulfite additions after the UV reactors were changed to dashed lines. In addition, the title was updated to “PROPOSED PROCESS SCHEMATIC – UV DISINFECTION WITH NLF INTERIM DEMINERALIZATION FACILITY (AT WRP ADJACENT SITE).” An updated diagram is attached.</p> <ul style="list-style-type: none"> • Diagram C5a and C5b: These diagrams should be removed. NLF plans to send RO permeate from their facility to the sewer only. • Diagram C6a and C6b: The lines showing the optional/ standby sodium hypochlorite, ammonia, and sodium bisulfite additions after the UV reactors were changed to dashed lines. In addition, the title was updated to “PROPOSED PROCESS SCHEMATIC – ADVANCED WATER TREATMENT.” An updated diagram is attached. 		
D5	<p>MRP Table E-2, Page E-8: The sample type for cyanide is 24-hour composite but listed as a grab for priority pollutant monitoring.</p> <p>We suggest changing the sample type for influent cyanide to a grab sample due to analyte volatility and to be consistent with the priority pollutant sample type for cyanide.</p>	The sample type for influent cyanide monitoring was revised as requested.	Changed cyanide influent sample type to grab in the MRP
D6	MRP Table E-3 and E-5, Pages E-12 and E-22: The units for PCBs as aroclors are pg/L.	The units for PCBs as aroclors were revised as requested.	Changed units for

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	PCBs as aroclors have historically been reported in ug/L. We suggest changing the units for PCBs as aroclors to µg/L.		PCBs as aroclors to µg/L
D7	<p>Fact Sheet Section 2.4, Page F-9: “The Discharger also had a deficient monitoring report in November 2020, when they failed to collect a valid sample for bis(2-ethylhexyl)phthalate and another one in August 2021, when they failed to report valid results for the BOD effluent and influent samples. Makeup samples were collected in subsequent months to take the place of the samples that were not collected or were deemed invalid due to failure to meet quality assurance requirements.”</p> <p>The result from the November 2020 effluent bis(2-ethylhexyl) phthalate sample was invalidated due to blank contamination and the August 2021 influent/effluent BOD samples were invalidated due to failing quality assurance/quality control parameters. As a good faith effort, make-up samples were collected for these missing results and successfully analyzed and reported. We do not consider these issues reflective of deficient monitoring and suggest the following updates to this text.</p> <p>Proposed new text is in bold and removed text is in strikethrough: “The Discharger also had non-reportable results for required monitoring a deficient monitoring report in November 2020, when they failed to collect a valid sample for bis(2-ethylhexyl)phthalate and another one and in August</p>	<p>The Fact Sheet discussion was revised as follows:</p> <p>The Discharger also had non-reportable results for required monitoring in November 2020 and in August 2021 because quality assurance/quality control failures invalidated results for effluent bis(2-ethylhexyl) phthalate and influent and effluent BOD, respectively. Make-up samples were collected and successfully analyzed and reported in subsequent reporting periods.</p>	Revised the QA/QC discussion in the Fact Sheet

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	<p>2021 because quality assurance/quality control failures invalidated results for effluent bis(2-ethylhexyl) phthalate and influent and effluent BOD, respectively. when they failed to report valid results for the BOD effluent and influent samples. Make-up Makeup samples were collected and successfully analyzed and reported in subsequent reporting periods. months to take the place of the samples that were not collected or were deemed invalid due to failure to meet quality assurance requirements."</p>		

Comment Letter dated April 18, 2022, from Wishtoyo Foundation

No.	Comment	Response	Action Taken
W1	<p>Wishtoyo reviewed monitoring data found in monthly NPDES monitoring reports on the California Integrated Water Quality System Project (CIWQS) between January 2015 and December 2021. In their review, Wishtoyo found that of the 437 monitoring events in which both RSW-001U and RSW-002D temperatures were sampled, there were 366 data points in which the receiving water temperature was increased by more than 5°F. This is approximately 83.75% of the weekly monitoring data during this time period. Discharges from the Valencia WRP are consistently increasing receiving water temperatures much higher than the 5°F limit and having negative impacts on the beneficial uses of this reach of the Santa Clara River. The</p>	<p>The tentative permit contains a temperature effluent limit of 80°F to better ensure attainment of the permit's receiving water limits.</p> <p>The Santa Clarita Valley Sanitation District will be subject to a compliance schedule and an 86°F interim effluent limit because the Valencia WRP cannot consistently comply with the following Basin Plan temperature water quality objectives:</p> <p><i>The natural receiving water temperature of all regional waters shall not be altered unless it can be demonstrated to the satisfaction of the Regional Board that such alteration in temperature does not adversely affect beneficial uses.</i></p>	None necessary.

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	<p>perennial surface flows of the Santa Clara River upstream of the Valencia WRP support foraging and breeding habitat for unarmored threespine stickleback (federally endangered) and Least Bell's Vireo (federally endangered). This reach's surface waters also provide important habitat for a multitude of native tree frogs, toads, fishes, and bird species that rely on riparian habitat. The increase of water temperatures has sub lethal and even lethal impacts on aquatic species that are acclimated to lower surface water temperatures.</p>	<p><i>Alterations that are allowed must meet the requirements below.</i></p> <p><i>For waters designated WARM, water temperature shall not be altered by more than 5 °F above the natural temperature. At no time shall these WARM-designated waters be raised above 80 °F as a result of waste discharges.</i></p> <p>The cause of the five-degree temperature difference in the receiving water has not been identified conclusively and may be due to multiple factors. SCVSD will prepare and implement a technical workplan to evaluate the impact of the effluent on the receiving water temperature and potential management options as required in the compliance schedule.</p>	
W2	<p>Temperature increases also negatively impact dissolved oxygen concentration and increase the concentration of ammonia, which is acutely toxic to aquatic life, in surface waters.</p>	<p>The Los Angeles Water Board agrees that the elevated temperature can negatively impact certain water quality indicators such as dissolved oxygen (DO), and may impact the ammonia concentrations in the water. Considering the influence that high temperature may have on DO and ammonia, the Tentative Order prescribes separate final effluent limitations and monitoring and reporting requirements for ammonia, DO, biochemical oxygen demand, and toxicity for the protection of aquatic life.</p>	None necessary.

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W3	<p>The Santa Clarita Valley Sanitation District claims that these continuous temperature increases of the Santa Clara River do not violate their permit because the receiving waters are not representative of natural surface flows. Their reasoning follows: “The Sanitation District does not consider flow at upstream receiving water station RSW-001U (R-C) to be representative of natural conditions. Hyporheic Santa Clara River flow resurfaces closely upstream of monitoring station RSW-001U (R-C). As a result, flow upstream of RSW-002D (R-D) is atypically cold and unrepresentative of surface waters in this region. In recognition of this, Section V.A.1 of the WDR allows for a case-by-case determination of natural (i.e., baseline) conditions. Although the Sanitation District shall continue to report temperature increases of greater than 5°F at station RSW-002D (R-D), the increases are not considered exceedances of the receiving water objective.”</p> <p>This reasoning cited by the sanitation district immediately above makes no sense. Naturally occurring perennial surface flows of the upper Santa Clara River watershed have been and continue to be dependent on groundwater upwelling in tributaries and in the mainstem of the river. The upper Santa Clara River exists in a high desert/chaparral climate, where the river is naturally ephemeral, with gaining reaches that supply perennial surface flows that support aquatic wildlife</p>	<p>Regarding continued enforcement action, enforcement staff investigate exceedances of WQBELs and take appropriate enforcement action for violations of permit requirements as required by and consistent with the California Water Code and State Water Resources Control Board’s Water Quality Enforcement Policy.</p> <p>Any unresolved violations of Order No. R4-2015-0071 can still be addressed as appropriate after permit renewal. The Tentative Order states that “Order Number R4-2015-0071 is rescinded upon the effective date of this order <i>except for enforcement purposes....</i>”</p>	None necessary.

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Valencia WRP

No.	Comment	Response	Action Taken
	<p>like the unarmored threespine stickleback and healthy stands of willow and mulefat scrub that are essential for Least Bell's Vireo nesting. The reach upstream of the Valencia WRP discharge is no exception. A hydrological technical report on this reach of the Santa Clara River, conducted by Environmental Science Associates for the Santa Clara Valley Sanitation District, found "Stream flow from downstream of the McBean Dry Gap to the VWRP is nearly perennial, with groundwater upwelling occurring from the confluence of San Francisquito Creek to the VWRP" (SCVSD 20131). This is a groundwater dependent ecosystem where federally listed and native riparian species thrive in the perennial surface flows. The waters upstream of the Valencia WRP discharge are absolutely representative of natural conditions, as this gaining reach has supported perennial flows for far longer than the Valencia plant has discharged into the Santa Clara River. Despite the argument made concerning "natural conditions", the receiving waters in the Santa Clara River are Waters of the United States and are protected by the Clean Water Act and its permitting requirements.</p> <p>We ask that the Regional Board enforce water quality objectives for waters designated as warm freshwater habitat and require that "water temperature shall not be altered by more than 5°F above the natural temperature."</p>		

No.	Comment	Response	Action Taken
W4	<p>During Wishtoyo’s review of Valencia WRP’s NPDES monitoring reports, several significant inconsistencies were found concerning the temperature monitoring data.</p> <p>On October 13th, 2015, RSW-001U temperature was 72.4°F and RSW-002D temperature was 86.9°F. This is an increase of 14.5°F, almost three times the limit discussed above. Again, 86°F is the maximum effluent temperature. There is no effluent temperature data reported for 10/13/2015, but the report insists that this is “not a violation”. In order for 12.76 MGD of discharged water to change the temperature of 0.4 MGD of receiving water by 14.5°F to 86.9°F, the effluent temperature would have been at least 87.35°F.</p> <p>On August 7th, 2018, RSW-001U temperature was 80.5°F and RSW-002D temperature was 88.8°F. Effluent temperature was reported to be 84°F that day. The effluent temperature data reported is highly improbable. The path of the effluent is well shaded by thick stands of giant reed and willow scrub for the approximate 500 feet before it reaches the Santa Clara River. There are many data points from summer days in which effluent temperatures between 82 and 85°F did not manage to increase the receiving water temperature above 86°F. Ambient temperatures likely do not have significant effect on effluent temperatures in the summer months due to vegetation and shading, velocity of discharge, and the relatively high temperatures of</p>	<p>SCVSD uses an NIST-traceable thermometer and EPA Method 170.1 to measure temperature from grab samples for the effluent and receiving water stations and then submits results by uploading reports to the CIWQS database under the penalty of perjury. SCVSD properly maintains its equipment as required in the NPDES permit and calibrates its thermometers on an annual basis. SCVSD submitted the calibration logs for the temperature probes to the Los Angeles Water Board upon request on April 22, 2022 and they are attached.</p> <p>The effluent monitoring sample is also collected downstream of any in-plant return flows and after the final disinfection process at the Valencia WRP and is therefore representative of the discharge going to the Santa Clara River.</p> <p>The timing of sample collection at each location is also variable during each sampling event and monitoring is only required to be conducted on a weekly basis in the Monitoring and Reporting Program (MRP). If the discharger monitors a monitoring location more often than required in the permit using approved methods, the discharger is required to report those results, so the monitoring data on a single day may not include results for all monitoring locations (see results for October 7, 2020). The MRP does not require that the effluent and receiving water samples be collected on the same day, so in</p>	None necessary.

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	<p>the effluent when compared to ambient temperatures. In order for the discharge (16.6 CFS) to have increased the receiving water (0.4 CFS) temperature from 80.5°F to 88.8°F, the discharge would have been at least 89°F. The data from this particular day is also evidence that upstream receiving water temperatures fluctuate, and in some cases, reach 80°F. This directly contradicts the sanitation district's claim that the receiving waters are "atypically cold and unrepresentative of surface waters in this region."</p> <p>On August 14th, 2018, RSW-001U recorded temperature was 80.9°F and RSW-002D recorded temperature was 87.2°F. Effluent temperature was reported to be 84°F that day. For the same reasons discussed in the analysis of the August 7th reporting, this effluent temperature data reported is highly improbable. In order for 15.7 CFS of effluent to increase the temperature of 0.3 CFS of receiving surface water at 80.9°F to 87.2°F, the effluent would have been at least 87.32°F.</p> <p>On September 25th, 2018, RSW-001U recorded temperature was 72.6°F and the RSW-002D recorded temperature was 87°F. Effluent temperature was reported to be 83°F. This reported effluent temperature is improbable. This is an increase of 14.4°F, almost three times the limit for WARM beneficial use. In order for 20.4 CFS of effluent to increase the temperature of 0.6 CFS of</p>	<p>some cases the monitoring locations may be sampled on different days (see results for October 2015). However, much of the sampling is collected on the same day and as close in time as possible, considering the time it takes to travel between the sampling stations.</p> <p>The impact the canopy cover has on the temperature of the receiving water is variable because the path of the Santa Clara River is dynamic and the receiving water sample locations may not be constant throughout the year. Due to the natural dynamic state of the Santa Clara River, the canopy cover may also change throughout the year, impacting the temperature of the receiving water.</p> <p>The sampling events described in the comment are summarized in the table below and based on this summary, it is difficult to determine the cause of the data discrepancies described. The sample collection times are variable in each case and in most cases the downstream receiving water temperature is greater than the effluent temperature. Considering the variables described above and the language in the current permit for the receiving water limitations (see response to Comment W1), it is difficult to attribute the increase in the receiving water temperature between the upstream and downstream monitoring locations solely to the effluent discharge. Due to the number of variables</p>	

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	<p>receiving surface water at 72.6°F to 87°F, the effluent would have been at least 87.42°F.</p> <p>On October 1st, 2018, RSW-001U recorded temperature was 76°F and RSW-002D recorded temperature was 87.7°F. Effluent temperature reported to be 82.5°F. This reported effluent temperature is improbable. Effluent flow data from this date does not add up with flow reported at RSW-001U and RSW-002D. Flow at RSW-001U was 0.4 CFS and Flow at RSW-002D was 26 CFS. Effluent flow reported that day was 13.42 MGD or 20.76 CFS. These data points were likely recorded hours apart. If discharge at the time of temperature monitoring was 25.6 CFS, effluent temperature would have been at least 87.88°F in order to increase the temperature of the receiving water by 11.7°F to 87.7°F.</p> <p>On October 5th, 2020, RSW-001U recorded temperature was 66.2°F and RSW-002D recorded temperature was 85.6°F. The NPDES monitoring report does not include effluent temperature data for this day and does not include flow data for RSW-001U or RSW-002D. This is an increase of 19.4°F. If the upstream location had flows similar to what was recorded on the 6th (2 CFS), the effluent (12.89 MGD = 19.94 CFS) temperature would have had to be at least 87.55°F. This is of course impossible to know, because no temperature data was recorded at the effluent point that day and no flow data was recorded at the monitoring locations.</p>	<p>involved in assessing exceedances of the receiving water limitation in the current permit, the Tentative Order includes additional requirements in section 5.1.1. that all regional waters shall not be altered unless it can be demonstrated to the satisfaction of the Los Angeles Water Board that such alteration in temperature does not adversely affect the beneficial uses and that at no time shall these WARM-designated water be raised above 80°F as a result of the waste discharge. These receiving water limitations are consistent with the Basin Plan water quality objectives and will be in effect after the expiration of the interim limits in the compliance schedule.</p> <table border="1" data-bbox="1024 870 1724 1390"> <thead> <tr> <th data-bbox="1024 870 1234 976">Sampling Location</th> <th data-bbox="1234 870 1375 976">Temp. (°F)</th> <th data-bbox="1375 870 1564 976">Date</th> <th data-bbox="1564 870 1724 976">Time</th> </tr> </thead> <tbody> <tr> <td data-bbox="1024 976 1234 1081">Effluent</td> <td data-bbox="1234 976 1375 1081">83.8</td> <td data-bbox="1375 976 1564 1081">10/14/2015</td> <td data-bbox="1564 976 1724 1081">11:00 am</td> </tr> <tr> <td data-bbox="1024 1081 1234 1187">Upstream RSW001U</td> <td data-bbox="1234 1081 1375 1187">72.4</td> <td data-bbox="1375 1081 1564 1187">10/13/2015</td> <td data-bbox="1564 1081 1724 1187">11:08 am</td> </tr> <tr> <td data-bbox="1024 1187 1234 1317">Downstream RSW002D</td> <td data-bbox="1234 1187 1375 1317">86.9</td> <td data-bbox="1375 1187 1564 1317">10/14/2015</td> <td data-bbox="1564 1187 1724 1317">10:36 am</td> </tr> <tr> <td data-bbox="1024 1317 1234 1390">Effluent</td> <td data-bbox="1234 1317 1375 1390">84</td> <td data-bbox="1375 1317 1564 1390">08/07/2018</td> <td data-bbox="1564 1317 1724 1390">9:59 am</td> </tr> </tbody> </table>	Sampling Location	Temp. (°F)	Date	Time	Effluent	83.8	10/14/2015	11:00 am	Upstream RSW001U	72.4	10/13/2015	11:08 am	Downstream RSW002D	86.9	10/14/2015	10:36 am	Effluent	84	08/07/2018	9:59 am	
Sampling Location	Temp. (°F)	Date	Time																				
Effluent	83.8	10/14/2015	11:00 am																				
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No.	Comment	Response				Action Taken
		Sampling Location	Temp. (°F)	Date	Time	
	<p>Similarly, on October 7th, 2020, RSW-001U recorded temperature was 66.3°F and RSW-002D recorded temperature was 86.6°F. This is an increase of 20.3°F. The NPDES monitoring report does not include effluent temperature data for this day and does not include flow data for RSW-001U or RSW-002D. Because effluent temperature was not monitored this day and there is no flow data for the monitoring points, there is no way of knowing if this increase in temperature was in fact caused by effluent discharge reaching temperatures above 86°F.</p>	Upstream RSW001U	80.5	08/07/2018	10:50 am	
	<p>These temperature monitoring inconsistencies calls into question the accuracy of the Sanitation District's effluent temperature data reported in the NPDES monitoring reports. In every single case that downstream receiving waters reached temperatures above 86°F, effluent data reported was between 82 and 85°F, which is physically improbable considering the immense increases in temperature of receiving waters and the site conditions. LA County Sanitation District is not taking representative data of temperature conditions at the Valencia WRP. Temperature should be monitored at the effluent point continuously, at 15-minute intervals in order to capture accurate and representative effluent data at this site.</p>	Downstream RSW002D	88	08/07/2018	10:20 am	
		Effluent	84.0	08/14/2018	10:35 am	
		Upstream RSW001U	80.9	08/14/2018	11:45 am	
		Downstream RSW002D	87.2	8/14/2018	11:22 am	
		Effluent	83.0	09/25/2018	10:58 am	
		Upstream RSW001U	72.6	09/25/2018	10:41 am	
		Downstream RSW002D	87.0	09/25/2018	10:28 am	
		Effluent	82.5	10/01/2018	11:17 am	
		Upstream RSW001U	76.0	10/01/2018	11:30 am	

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		Sampling Location	Temp. (°F)	Date	Time	
		Downstream RSW002D	87.7	10/01/2018	10:57 am	
		Effluent	80.2	10/06/2020	10:00 am	
		Upstream RSW001U	64.7	10/06/2020	11:17 am	
		Downstream RSW002D	74.9	10/06/2020	10:46 am	
		Upstream RSW001U	66.3	10/07/2020	12:23 pm	
		Downstream RSW002D	86.6	10/07/2020	12:06 pm	
W5	These temperature monitoring inconsistencies calls into question the accuracy of the Sanitation District's effluent temperature data reported in the NPDES monitoring reports. In every single case that downstream receiving waters reached temperatures above 86°F, effluent data reported was between 82 and 85°F, which is physically improbable considering the immense increases in temperature of receiving waters and the site	See response to Comment W4. The NPDES permit doesn't require continuous effluent temperature readings because effluent temperature is not expected to fluctuate significantly since the source is municipal wastewater and the permit requires an extensive source control program.				None necessary.

Response to Comments
Valencia WRP

No.	Comment	Response	Action Taken
	<p>conditions. LA County Sanitation District is not taking representative data of temperature conditions at the Valencia WRP. Temperature should be monitored at the effluent point continuously, at 15-minute intervals in order to capture accurate and representative effluent data at this site.</p>		
W6	<p>Wishtoyo asks that the Los Angeles Water Board investigate the data inconsistencies in effluent temperature monitoring of the Valencia WRP. The receiving waters have been increased above 86°F multiple times and each time, the effluent temperature data does not add up; and each time the monitoring report suggests this event is “not a violation”.</p>	<p>Refer to response to Comment W4 above.</p>	<p>None necessary.</p>
W7	<p>We request that the regional board require a special study under this Tentative Permit, for the Permittee to collect continuous effluent temperature data during the summer and fall of 2022. There must be a formal presentation of this data back to the board during a publicly noticed meeting at the conclusion of this special study, and a written report must be made publicly available.</p>	<p>The compliance schedule in the tentative permit requires SCVSD to release a request for proposal to retain a consultant to evaluate temperature impacts in the watershed and management options by June 30, 2023. The Los Angeles Water Board staff will review the proposal after it is submitted and will provide comments before the Technical Workplan is finalized by June 30, 2024. The Los Angeles Water Board staff will consider the use of temperature probes to evaluate diurnal variations of effluent and receiving water temperatures when reviewing the work plan. The Los Angeles Water Board staff will also require a written report including the findings of SCVSD’s evaluation and</p>	<p>None necessary.</p>

No.	Comment	Response	Action Taken
		will consider having SCVSD present the findings to the Board as an information item at a regularly scheduled Board meeting.	
W8	Wishtoyo requests that the Regional Board remove the interim effluent limitation for water temperature, which allows effluent water temperatures up to 86° F.	<p>The interim limit provided in the Tentative Order is established consistent with Resolve 7.b of the State Water Board’s Resolution 2008-0025, Policy for Compliance Schedules in National Pollutant Discharge Elimination System Permits (Compliance Schedule Policy), which reads as follows:</p> <p>“If the compliance schedule exceeds one year, the Water Board shall establish interim numeric limitations for the pollutant in the permit; and may also impose interim requirements to control the pollutant, such as pollutant minimization and source control measures. Numeric interim limitations for the pollutant must, at a minimum, be based on current treatment facility performance or on existing permit limitations, whichever is more stringent. If the existing permit limitations are more stringent, and the discharger is not in compliance with those limitations, the noncompliance under the existing permit must be addressed through appropriate enforcement action before the permit can be reissued, unless the anti-backsliding</p>	None necessary.

Response to Comments
Valencia WRP

No.	Comment	Response	Action Taken
		provisions in Clean Water Act section 402(o) are met.”	
W9	The Valencia WRP cannot be allowed 10 additional years to reduce effluent maximum from 86° to 80°F. Valencia WRP needs to be placed on an accelerated schedule to reduce effluent temperature and reduce temperature impacts to receiving waters.	This schedule is as short as practicable based on the information that is currently available. As additional information is gathered, and prior to the expiration of the 2022 Order, the Los Angeles Water Board will reassess the length of the compliance schedule and the remaining tasks.	None necessary.

Comment Letter dated April 18, 2022, from Heal the Bay and Los Angeles Waterkeeper

No.	Comment	Response	Action Taken
H1	<p>The Regional Board must enforce that instream water temperature shall not exceed 80°F, or be raised by more than 5°F, as a result of waste discharge.</p> <p>Warmer water temperatures negatively affect the beneficial uses for humans as well as the organisms that rely on these water sources for survival. Water temperature influences the types of aquatic life that are able to survive and reproduce in the river. An increase in temperature also increases the rate of decaying organic matter, which then depletes the supply of oxygen. This could lead to hypoxic conditions as warm water also holds less dissolved oxygen.</p> <p>As stated on page F-31 of the Tentative Permit, the Los Angeles Basin Plan contains specific water quality</p>	Refer to the response to Comments W1, W2, and W3 above.	None necessary.

No.	Comment	Response	Action Taken
	<p>objectives for waters designated as warm freshwater habitat (WARM), such as the Santa Clara River, such that “water temperature shall not be altered by more than 5°F above the natural temperature. At no time shall these WARM-designated waters be raised above 80°F as a result of waste discharges.”</p>		
H2	<p>Exceedances of the temperature water quality objectives are not sufficiently addressed in the compliance summary of the Tentative Permit. We offer an additional temperature data summary.</p> <p>To better understand the temperature impacts of the Facility, we compiled all of the temperature data reported for 2021 through the California Integrated Water Quality System Project (CIWQS). The data covered 63 sampling events collected at Effluent Monitoring Station EFF-001 (effluent), Receiving Water Monitoring Station RSW-001U (directly upstream from effluent), Receiving Water Monitoring Station RSW-002D (directly downstream from effluent), and Receiving Water Monitoring Station RSW-003D (roughly 3 miles downstream from effluent). A copy of Figure E-1 of the Tentative Permit (Valencia WRP Receiving Water Stations) is included in Attachment 1 of this letter, for ease of reference. These 63 sampling events occurred throughout the year. With the exception of one sampling event, when one sample was collected the day after all the others were collected, all samples for each event were collected on the same day, allowing for reliable comparability. Unfortunately, data was missing for</p>	<p>The compliance summary discussion in the Fact Sheet focuses on compliance with the end of pipe final effluent limitations contained in the current permit, Order No. R4-2015-0071.</p> <p>The temperature effluent limitation in the current NPDES Order No. R4-2015-0071 contains the following effluent limitation in section IV.A.3.b. for temperature:</p> <p style="padding-left: 40px;">The temperature of wastes discharged shall not exceed 86 °F except as a result of external ambient temperature.</p> <p>Therefore, under the 2015 permit, final effluent temperature measurements above 80 °F but less than 86 °F were not exceedances of the permit limit and neither were measurements above 86 °F if they were due to high ambient temperature.</p> <p>Similarly, the current NPDES Order No. R4-2015-0071 also contains the following receiving water limitation in section V.A.1 for temperature:</p>	None necessary.

No.	Comment	Response	Action Taken
	<p>several of these sampling events either for the effluent (EFF-001), or for the site furthest downstream from the effluent (RSW-003D), both critical data points to fully understand the impacts of the Facility on the Santa Clara River. The complete 2021 temperature data set is shown in Attachment 2.</p>	<p>For waters designated with a warm freshwater habitat (WARM) beneficial use, the temperature of the receiving water at any time or place and within any given 24-hour period shall not be altered by more than 5 °F above the natural temperature due to the discharge of effluent at the receiving water station located downstream of the discharge. Natural conditions shall be determined on a case-by-case basis.</p> <p>If the receiving water temperature, downstream of the discharge, exceeds 86 °F as a result of the following:</p> <ul style="list-style-type: none"> a. High temperature in the ambient air; or, b. High temperature in the receiving water upstream of the discharge, then the exceedance shall not be considered a violation. <p>If the receiving water temperature deviates more than 5°F between the upstream and downstream monitoring location, the Los Angeles Water Board enforcement staff has discretion based on data and information specific to the monitoring event.</p> <p>The Tentative Order proposes a final effluent limitation of 80 °F and an interim effluent limitation of 86 °F. The interim effluent</p>	

No.	Comment	Response	Action Taken
		<p>limitation was included in the Tentative Order because based on past effluent temperature data, the discharge is not able to consistently meet the newly interpreted final effluent limitation of 80 °F. This provides the discharger with additional time it needs to come into compliance with this effluent limitation based on the newly interpreted water quality objective.</p> <p>Refer to the response to Comment W3 above regarding enforcement.</p>	
H3	<p>Unfortunately, data was missing for several of these sampling events either for the effluent (EFF-001), or for the site furthest downstream from the effluent (RSW-003D), both critical data points to fully understand the impacts of the Facility on the Santa Clara River.</p>	<p>Effluent temperature monitoring, which is conducted on a weekly basis, is not required to be conducted concurrently with the receiving water monitoring. Effluent temperature samples are not considered to be missing if they were collected on a separate day and time from the receiving water sample collection.</p>	None necessary.
H4	<p>Upstream of the Facility, the Santa Clara River becomes a gaining stream fed primarily by upwelling groundwater, as identified in an environmental impact report conducted in 2013 by the permittee. The permittee has posited that, owing to this groundwater upwelling, flow upstream of RSW-002D is atypically cold and unrepresentative of surface waters in this region. We disagree with this assumption entirely. If groundwater naturally and consistently upwells at this location along the Santa Clara River, that is the natural</p>	<p>Refer to the response to Comments W5 and W7 above.</p> <p>There is no definition for the term “natural conditions,” so it is subject to interpretation by enforcement staff based on data and information specific to the monitoring event.</p>	None necessary.

No.	Comment	Response	Action Taken
	<p>condition for this reach of the Santa Clara River. A sudden increase in water temperatures by more than 5°F above these natural conditions will negatively affect the ecological integrity of the Santa Clara River at this location.</p>		
H5	<p>Our analysis of the 2021 data for the Facility identified that temperatures recorded at the location just downstream from the effluent site (RSW-002D) were more than 5°F above temperatures recorded immediately upstream of the effluent (RSW-001U) 92% of the time -- during 58 of the 63 sampling events. This increase in the instream water temperature occurred year-round. Looking even further downstream, temperatures recorded at RSW-003D were more than 5°F above temperatures recorded at RSW-001U during 12 of the 63 sampling events. This downstream water temperature increase mainly occurred during the summer months, and some of these high temperature events were not accompanied by a temperature recording at EFF-001. A lack of effluent data is concerning, given the high instream temperature gradient during these sampling events.</p> <p>Additionally, temperatures recorded at EFF-001 exceeded the final WQBEL for discharge point 001 (80°F) during 15 of the 63 sampling events in 2021. We recognize that this does not constitute a violation owing to the interim effluent limit of 86°F, but we</p>	<p>See response to Comments H2 and W4. Effluent temperature monitoring, which is conducted on a weekly basis, is also not required to be conducted concurrently with the receiving water monitoring.</p>	<p>None necessary.</p>

No.	Comment	Response	Action Taken
	maintain that these exceedances are cause for concern.		
H6	<p>In addition, the overall impact of warm water discharge is much more severe throughout the full permit term. Looking back at additional data from this permit term reported on CIWQS, beginning in 2015, there have been at least five instances when receiving water temperature was above 86°F at RSW-002D, likely as a result from the discharge given the much lower temperatures upstream at RSW-001U. For example, on 10/13/2015, water temperature downstream of the effluent was 86.9°F, which was 14.5°F higher than upstream of the effluent. Unfortunately, there was no record of the effluent temperature that day. More recently, on 10/7/2020, water temperature downstream of the effluent was 86.6°F, which was 20.3°F higher than upstream of the effluent. Again, there was no record of the effluent temperature that day. On 9/25/2018, water temperature downstream of the effluent was 87°F, which was 14.4°F higher than upstream of the effluent. During this sampling event, there is effluent temperature data listed at 83°F, which does not explain the high temperature increase within the instream waters. Either there is an issue with the effluent reporting data, or there is another source of high temperature water located near EFF-001. Either way, the source of high temperature water must be identified and removed.</p>	<p>Refer to response to Comment W4 regarding these specific examples.</p> <p>Refer to response to Comment H4 regarding effluent temperature monitoring frequency.</p> <p>The Los Angeles Water Board will consider additional sources of high temperature to the receiving water when reviewing the technical work plan. Refer to the response to Comment W7.</p>	None necessary.

No.	Comment	Response	Action Taken
H7	<p>Although there have been clear exceedances of the Basin Plan requirement that “water temperature shall not be altered by more than 5°F above the natural temperature” and that at “no time shall these WARM-designated waters be raised above 80°F as a result of waste discharges,” no violations have been determined.</p> <p>The Regional Board must take immediate enforcement action in response to exceedances of the Los Angeles Basin Plan temperature requirements.</p> <p>Effluent from the Facility is negatively affecting the Santa Clara River, a water of the United States and habitat to 17 protected and/or endangered species. Therefore, the Regional Board must take immediate enforcement action in response to these exceedances to ensure that future effluent discharge does not increase instream water temperature by more than 5°F. The majority of sampling events from 2021 indicated that temperatures recorded at RSW-002D were more than 5°F above temperatures recorded at RSW-001U. A review of the complete data set since 2015 indicates that this trend has persisted throughout the permit term. This trend can no longer be allowed.</p>	<p>Refer to the response to Comment W3 regarding enforcement.</p>	<p>None necessary.</p>
H8	<p>The Regional Board must remove the interim effluent limitation for water temperature, and instead require a final effluent temperature limit of 80°F to protect the WARM-designated receiving water.</p> <p>The Regional Board must remove the interim effluent limitation for water temperature, which is currently</p>	<p>See Response to comment W8. The compliance schedule and the interim limit in section 4.1.2 of the 2022 Tentative Order are authorized under section 1.e. of the State Water Board’s Resolution 2008-0025, Policy for Compliance Schedules in National Pollutant</p>	<p>None necessary.</p>

No.	Comment	Response	Action Taken
	<p>allowing effluent water temperatures up to 86°F. We are already seeing that this effluent is consistently increasing instream temperatures by more than 5°F (sometimes as much as 20°F). It is unacceptable to allow the discharge of even hotter water, above 80°F, to the Santa Clara River. This is particularly important considering that there have been at least five instances when the discharge increased receiving water temperature above 86°F at RSW-002D. Allowing discharge that causes such an exceedance goes directly against the Basin Plan requirements.</p>	<p>Discharge Elimination System Permits (Compliance Schedule Policy), for the newly interpreted temperature final effluent limitation. Since the discharger is unable to immediately comply with the new final effluent limitation, the interim limit is necessary to give the discharger additional time to complete tasks that will bring the discharge into compliance with the final effluent limitation.</p>	
H9	<p>The Regional Board should require a special study for the Permittee to collect continuous effluent temperature data during summer 2022.</p> <p>Our analysis of the data additionally highlights a need for a more critical assessment of effluent water temperatures, particularly during the summer months. Several sampling events reported through CIWQS are missing data for EFF-001, including multiple sampling events when both RSW-002D and RSW-003D were more than 5°F above temperatures recorded at RSW-001U. For other sampling events, the effluent temperature data is inconsistent with the temperature increase recorded by the instream water temperature data. We therefore request that the Regional Board require a special study under this Tentative Permit, for the Permittee to collect continuous effluent temperature data during summer 2022. There must be a formal presentation of this data back to the board during a publicly noticed meeting at the conclusion of</p>	<p>Refer to the response to Comment W7.</p>	<p>None necessary.</p>

No.	Comment	Response	Action Taken
	<p>this special study, and a written report must be made publicly available.</p>		
H10	<p>We commend the Regional Board for utilizing numeric toxicity effluent limits, and support the updates made to the Tentative Permit, in alignment with the Statewide Toxicity Provisions.</p> <p>In humans, the short-term effects of acute toxicity (e.g., eye irritation, allergic reactions, skin burns, rashes, itchiness, vomiting, etc.) are seen almost immediately, whereas chronic symptoms (e.g., cancers; loss of hearing, eyesight, or memory; tumors; muscle pain; organ failure; etc.) build up and develop over a longer period of time due to continued exposure. With animal species, the effects of acute toxicity are significant when 50% of the test population die from a one-time or limited exposure to high concentrations of the pollutant (LC 50). The effects of chronic toxicity are due to long-term exposure to these pollutants that negatively impair growth, reproduction/offspring viability, biological functions, weight fluctuations, and survival. Toxicity testing identifies discharges with toxic effluent that have cumulative negative impacts on aquatic life, even though individual pollutants may meet requirements for the limited list of California Toxic Rule (CTR) priority pollutants. Toxicity limits are, therefore, an important safety net in discharge permits that serves to integrate the actual biological impacts of numerous pollutants.</p>	<p>Comment noted.</p>	<p>None necessary.</p>

No.	Comment	Response	Action Taken
	<p>We commend the Regional Board for including numeric toxicity effluent limits using the Test for Significant Toxicity (TST) even within the previous permit. The TST is based on sound science and provides a clear toxicity objective. We further support the removal of accelerated monitoring in this Tentative Permit and the inclusion of requirements to more quickly initiate a Toxicity Reduction Evaluation (TRE), as required by the Statewide Toxicity Provisions, to more quickly identify and remediate the cause of any chronic or acute toxic event. Incorporation of these Statewide Toxicity Provisions into the Tentative Permit effectively complements the chemical approach addressing individual CTR priority pollutants and is critical to protect the water quality and ecological integrity of the Santa Clara River.</p>		

Comment Letter dated April 18, 2022, from Santa Clarita Organization for Planning and the Environment (SCOPE)

No.	Comment	Response	Action Taken
S1	<p>Chloride TMDL</p> <p>We have been informed by staff that this permit will not extend the compliance time line for meeting the Chloride TMDL. We appreciate this decision, since it is already long past the original timeline for the reduction of chloride levels in effluent releases for compliance with the Clean Water Act.</p>	Comment noted.	None necessary.

No.	Comment	Response	Action Taken
S2	<p>In addition, we have long been concerned about the level of chlorides that may be released from the Chiquita Canyon landfill, located near two of your downstream monitoring stations. While the landfill has the required leachate system, (monitored by your Board) in the newer sections of the Landfill, the oldest cell, located closest to the Santa Clara River is unlined. We urge you to monitor for landfill contaminants and well as increased levels of Chlorides at the monitoring station locations near the landfill.</p>	<p>The Chiquita Canyon Landfill discharge is outside the scope of the SCVSD Valencia WRP NPDES permit renewal.</p> <p>The landfill is subject to separate Waste Discharge Requirements (WDRs), under Order R4-2018-0172, which includes groundwater monitoring using a network 14 monitoring wells. Comments regarding this facility may be submitted during the permit renewal process. In addition, stormwater runoff from the landfill is regulated under the State Water Board's General Industrial Storm Water Permit, Order 2014-0057-DWQ (4A 190359001, enrolled on August 2, 2005).</p>	None necessary.
S3	<p>Public Involvement - Public Availability of Reports and Documents</p> <p>The NPDES permit makes reference to the Board's intention to encourage public involvement in several places within the document. If the RWQCB truly intends this outcome, then it is imperative that documents be posted in a public place where they are accessible for review.</p> <p>This NPDES Permit requires several annual reports and other reports including monitoring and compliance reports, safety plans etc. These reports are all required to be submitted digitally and uploaded to the RWQCB website. They should also be made available to the public and posted on a website for public review as soon as</p>	<p>The public notice distributed with the Tentative Order describes the availability of documents related to the development of the Tentative Order. The Report of Waste Discharge, other documents relied upon, tentative effluent limitations and special provisions, comments received, and other information on file are available for inspection and copying between the hours of 8:00 a.m. and 4:30 p.m. by appointment at the following address:</p> <p>California Water Quality Control Board Los Angeles Region 320 W 4th Street, Suite 200 Los Angeles, CA 90013</p> <p>On Sunday, April 17, 2022, Ms. Plambeck sent an email to permitting staff asking if the TMDL groundwater trend monitoring reports were</p>	None necessary.

No.	Comment	Response	Action Taken
	<p>possible after their submittal due date. The location of that website should be indicated in the NPDES permit so that the website and the location of the documents can be easily located for public review.</p> <p>While the permit seems to refer to Geotracker as a library for this information, we could not locate any documents on that site or on your website. We understand this may be due to not being familiar with the site navigation, however, such an impediment to public review could be easily resolved by listing the document library location in the permit. Uploading the documents should be an easy matter since they are all required to be submitted digitally to your website, as indicated above.</p>	<p>available online, requesting copies of the 2019 and 2020 trend monitoring reports, and a copy of the map showing the location of the groundwater monitoring wells.</p> <p>On Monday, April 18, 2022, prior to receiving the comment letter from SCOPE, permitting staff replied to Ms. Plambeck’s email explaining that the TMDL reports are not available online because 3rd party reports are not compliant with the Americans with Disabilities Act (ADA) and, therefore, cannot be placed on our website. Nonetheless, permitting staff sent Ms. Plambeck all of the 2019 reports, the 2020 reports, and a map of the wells that she had requested.</p> <p>The 2015 NPDES permit required SCVSD to meet the TMDL requirements that were incorporated by reference in Attachment J. However, the 2015 permit did not require SCVSD to submit TMDL reports on CIWQS or GeoTracker. SCVSD was submitting TMDL reports to TMDL staff via email.</p> <p>In the 2022 Tentative Order, permitting staff included language in section 10.4.8 of the Monitoring and Reporting Program that will require SCVSD to electronically submit progress reports to the Los Angeles Water Board on a semiannual basis for Task 4 of the TMDL and on an annual basis using CIWQS. In addition, permitting staff included language in section 10.4.7 of the MRP that will require SCVSD to electronically submit annual volumetric reports of recycled water to the State</p>	

No.	Comment	Response	Action Taken
		<p>Water Board using the GeoTracker database website. For municipal NPDES permittees, the Geotracker database is only used to track volumetric reporting data and data submitted for Waste Discharge Requirements (WDRs) and Water Reclamation Requirements (WRRs). All other data in compliance with NPDES permits is submitted to the CIWQS database.</p>	
S4	<p>Changes to the Previous Permit – Anti backsliding.</p> <p><u>Copper</u></p> <p>This permit proposes to remove two pollutant limits previously included in the 2015 permit, copper limitations and bis(2-ethylhexyl)phthalate, applicable to the Santa Clara River discharges “included in the prior order are removed in this Order for the Santa Clara River because the discharge did not show reasonable potential to cause or contribute to an exceedance of the applicable water quality criteria for these pollutants, based on the most recent monitoring data.” (2015-21, see pdf page 140, F-44).</p> <p>For copper, monitoring is proposed to also be decreased in frequency from monthly to quarterly.</p> <p>We disagree with the adjustments to copper and assert that loosening restricts cannot be made</p>	<p>Section 303(d)(4)(B) of the Clean Water Act (CWA) allows relaxation of effluent limitations where the quality of the receiving water equals or exceeds the levels necessary to protect the designated uses of the water or otherwise required by applicable water quality standards, if the revision is subject to and consistent with the State’s Antidegradation Policy. The Santa Clara River is not impaired for copper or bis(2-ethylhexyl)phthalate because the concentrations of these pollutants in the receiving water do not exceed the applicable water quality standards in the water column. The monitoring data, collected from May 2015 to July 2021, showed that the copper concentrations ranged from 1.0 µg/L to 3.8 µg/L, below the CTR criterion for freshwater aquatic life (after translating for hardness) of 20 µg/L, and bis(2-ethylhexyl) phthalate concentrations ranged from <0.16 µg/L to 2 µg/L, below the 4 µg/L MCL. As described in section 4.4.2 of the Fact Sheet, relaxation or removal of effluent limitations for these pollutants is consistent with the state and federal</p>	None necessary.

No.	Comment	Response	Action Taken
	<p>under the anti-backsliding rule for the following reasons.</p> <p>The Santa Clara River, and particularly the reaches below this treatment plant are home the at least two species of rare fish which could be immediately harmed by an increase in copper in plant effluent as well as being harmful to the insects on which they feed.</p>	<p>antidegradation policies. Therefore, the exception to the prohibition on relaxation of effluent limitations found in section 303(d)(4)(B) of the CWA allows the removal of these effluent limitations.</p> <p>The reduction in monitoring frequency is warranted for copper because the discharge no longer has reasonable potential to contribute to or exceed a water quality objective.</p>	
S5	<p>According to the ND PES permit, two chronic toxicity exceedances occurred during the permit period, but the cause could not be determined:</p> <p>“These chronic toxicity exceedances were intermittent and the Discharger was unable to determine the cause of the toxicity. The effluent was back in compliance in January 2016. The Discharger also had a deficient monitoring report in November 2020, when they failed to collect a valid sample for bis(2-ethylhexyl)phthalate and another one in August 2021, when they failed to report valid results for the BOD effluent and influent samples. Makeup samples were collected in subsequent months to take the place of the samples that were not collected or were deemed invalid due to failure to meet quality assurance requirements. The Board should note that the public safety shut offs did not affect the areas where the Saugus and Valencia treatment plants are located, so we are unclear as to how this would have</p>	<p>For accuracy of the record, the last sentence regarding public safety shut offs, included in the quote referenced in this comment does not appear in the cited section of the Tentative Order, nor does it appear anywhere in the Tentative Order.</p> <p>Refer to response to comment S4 regarding the rationale for removing the copper final effluent limitations and reducing the monitoring frequency.</p> <p>The 2015 Order requires that after the monthly median chronic toxicity limitation is exceeded, the Discharger shall conduct up to four accelerated tests, prior to initiating a Toxicity Reduction Evaluation (TRE). SCVSD did conduct accelerated testing prior to initiating a TRE, as required under the 2015 Order. However, the chronic toxicity requirements in section 5.7 of the 2022 Order MRP have been revised to require a Toxicity Reduction Evaluation (TRE) when toxicity is persistent: if the Permittee has any combination of two or more Maximum Daily Effluent Limitation (MDEL) or Monthly Median Effluent Limitation (MMEL)</p>	None necessary.

No.	Comment	Response	Action Taken
	<p>interfered with completion of the required upgrades” (pdf page 105, Document page F-9)</p> <p>Given the unknown cause of these events, we ask the Board if it is wise to eliminate parameters and reduce monitoring frequency for one of the possible causes for such a toxic event.</p> <p>Levels of dissolved copper are often increased from anthropogenic origins such as mine washings and direct applications of algicides, molluscicides or antifouling agents. The most toxic form of copper is the cupric ion (Cu²⁺). Fish and crustacea are 10 to 100 times more sensitive to the toxicity of copper than mammals. For salmonids, the upper recommended limit is < 0.03 mg/l in hard water (>100 mg/l CaCO₃) while in soft water it is <0.0006 mg/l.¹ The Regional Board is aware of various endangers fish species on the Santa Clara River including salmonids. (Southern California Steelhead populations, now being proposed for CESA listing and the UTS, already listed under the ESA and CESA.</p> <p>As described above, copper is a treatment for mussel infestations and algae. Both are issues known to be occurring in greater frequency in State Water Project facilities. (Indeed, Quagga mussels, an invasive that clogs water pipes and pipelines, have recently been found as far south as Castaic Lake in the Santa Clarita Valley. We</p>	<p>violations within a single calendar month or within two successive calendar months. In those situations, the Discharger must begin investigating the cause of the toxicity sooner than what was required under the prior permit.</p> <p>In addition, section 6.3.1.d of the Tentative Order includes a reopener provisions that allows the Los Angeles Water Board to modify, or revoke and reissue the Order if present or future investigations demonstrate that the discharge governed by the Order have or will have reasonable potential to cause or contribute to adverse impacts on water quality or beneficial uses of the receiving waters.</p>	

No.	Comment	Response	Action Taken
	<p>do not know whether copper is being used to treat these issues, but it is one of the treatments listed as available by the Bureau of Land Management.</p> <p>Such problems were occurring with far less frequency during the previous permit period when copper readings seemed to indicate low concentrations. Since the Santa Clarita Valley receives much of its water from the State Water Project, it is possible that current and future attempts to treat these problems will result in higher levels of copper in water treatment effluent in the future.</p> <p>Therefore, it is important to continue to monitor copper at the 2015 permit requirements and not remove the limits.</p> <p>Last, regarding copper, since copper is known to be toxic to some fin fish and crustacea, we wonder why levels are not listed for fish toxicity in the permit (see pdf page 181).</p>		
S6	<p>Ammonium Perchlorate</p> <p>We believe that the Board should require increased monitoring for ammonium perchlorate to quarterly monitoring from semi-annual proposed for the current permit.</p> <p>As the RWQB is undoubtedly aware, the Santa Clarita Valley has closed many of its water supply wells due to ammonium perchlorate</p>	<p>There is no CTR criterion for freshwater aquatic life for perchlorate and monitoring data from the Valencia WRP did not exceed the 6 µg/L maximum contaminant level (MCL). Therefore, increasing the monitoring frequency is not warranted. Effluent perchlorate data ranged from <0.2 to 0.97 µg/L; upstream receiving water data ranged from 0.28 to 2.6 µg/L; and groundwater data ranged from 0.12 to 4.6 µg/L.</p>	None necessary.

No.	Comment	Response	Action Taken
	<p>pollution and is treating others. While this should ensure that this pollutant is not present in the District’s effluent from the Valencia plant, identification of its presence would be both protective of the Santa Clara River and of the community as it could serve as an early warning that the pollution plume had migrated to yet another water well or that a well head treatment system is not functioning properly. Of course, there could also be unintended “upsets” in the water system.</p> <p>Community groups in the Santa Clarita Valley have long objected to infrequent perchlorate monitoring of water supply wells because it could result in a lag of as much as a year before pollutant exceedances are identified and addressed. In the case of one Valencia water supply well, that is exactly what occurred.</p>	<p>Regulating perchlorate in the drinking water is outside the purview of the Los Angeles Water Board; however, the State Water Resources Control Board’s Division of Drinking Water does regulate perchlorate in drinking water. DDW is currently in the process of establishing a lower detection limit for the purposes of reporting by gathering additional occurrence data and then revising the MCL, if the new data support development of a new standard (Perchlorate in Drinking Water California State Water Quality Control Board, https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/Perchlorate.html)</p> <p>The public can access groundwater perchlorate data by going on the webpage for the State Board’s Groundwater Ambient Monitoring and Assessment (GAMA) Program and clicking on the GAMA Groundwater Information System’s hyperlink provided below GAMA Groundwater (ca.gov)(https://gamagroundwater.waterboards.ca.gov/gama/gamamap/public/).</p>	
S7	<p>PFAS/PFOA</p> <p>These new pollutants have recently (2019) been found to be prevalent in our ground water supply. They have been identified as carcinogens. While well head treatment has been added to some wells, and others closed, the agency is currently pumping from wells</p>	<p>On April 5, 2022, the State Water Board had an information item regarding PFAS to discuss upcoming actions for PFAS in Drinking Water and Groundwater. The recorded State Water Board Meeting can be viewed at the following hyperlink State Water Resources Control Board Meeting - April 5, 2022 - YouTube</p>	None necessary.

No.	Comment	Response	Action Taken
	<p>where the pollutant is present, but that test at below the State health goal. With possible additions of this chemical to the waste water from the use of other consumer products, it would be prudent to add testing requirements for these pollutants.</p>	<p>(https://www.youtube.com/watch?v=pGtg26tN4PM)</p> <p>SCVSD has complied with the State Water Resources Control Board's Order No. WQ 2020-0015-DWQ, which required certain POTWs to answer a questionnaire, submit a work plan, monitor for per- and polyfluoroalkyl substances (PFAS) for one year, and submit the results on the GeoTracker database. Influent and effluent data was monitored for PFAS from November 2020 to August 2021 and the results may be viewed on Geotracker under Global ID WDR100001103. Additional monitoring requirements will be consistent with the direction provided by the State Water Board.</p>	
S8	<p>Time Line for Meeting New Temperature</p> <p>We are discouraged by the long timeline that this NPDES permit allows for temperature compliance and ask that it be shortened.</p> <p>As we recall, we objected to the 86F degree temperature limit in the 2012 and 2015 permits, arguing that a lower limit was required to be protective of aquatic species and fish. Indeed, steam can be seen rising from the river in colder winter temperatures due to the difference in the temperature of the receiving water and the effluent releases. Although the current and previous NPDES permits promised that the permit could be re-opened and changes made if</p>	<p>Refer to the response to Comment H7 regarding the compliance schedule.</p> <p>In the past, SCOPE submitted comment letters regarding the temperature limitation for the Newhall Ranch WRP tentative NPDES permit and regarding the chloride compliance schedule for the Saugus and Valencia WRP TSOs, but not with respect to the temperature limitations for the previous Valencia WRP tentative permits.</p> <p>The temperature Basin Plan water quality objective (WQO) was not revised, but rather reinterpreted. Since the reopener language was not triggered, the NPDES permits were not reopened.</p>	None necessary.

No.	Comment	Response	Action Taken
	<p>rules changed, the permit was not re-opened and revised when the Basin Plan temperature level was reduced to 80 degrees. Thus, the Sanitation District has already been out of compliance with the Basin Plan and aware of its non-compliance for the last seven years. In spite of this, no one made any attempt to change the permit or otherwise compel compliance in spite of the danger the increased temperatures could pose to aquatic species.</p> <p>Thus, we ask that the timeline for compliance be shortened from ten years to five years, and that the initial step of hiring consultants be completed by the end of this year.</p>	<p>Refer to response to Comment H4 regarding compliance with the temperature limitation.</p> <p>The timeline will be reevaluated in 2027, prior to the expiration of the 2022 Order.</p>	
S9	<p>Treatment with Chloramine</p> <p>The permit states in several places that the District may switch its current disinfection treatment with chlorine to chloramine. It also states that any residual chlorine will be removed prior to effluent releases. We are sure that the Board is aware of the long-lasting retention of chlorine residual in chloramine and its high toxicity to fish. We ask that monitoring requirements be devised to ensure there are no toxicity events due to the use of chloramine as a disinfectant.</p>	<p>The process flow diagrams illustrate that SCVSD may use two different methods of disinfection. On August 30, 2021, SCVSD began using UV disinfection for the effluent that is discharged to the Santa Clara River. Chloramination is being used to disinfect the recycled water that is used for irrigation purposes. Since the water discharged to the Santa Clara River is being treated by UV disinfection and the Tentative Order includes toxicity monitoring requirements, no additional monitoring requirements related to chloramines is warranted.</p>	None necessary.
S10	Interim Valencia-Newhall Wastewater Treatment	The interim Reverse Osmosis (RO) plant has been built by Five Point (formerly known as Newhall Land and Farming) and is operating to remove chloride	None necessary.

No.	Comment	Response	Action Taken
	<p>The Valencia WRP will temporarily treat the sewage generated by the first 6,000 dwelling units of Newhall Ranch, until such time as the Newhall Ranch WRP is built, as described in the amendment to the Valencia WRP NPDES permit, R4-2009-0074-A01, adopted by the Los Angeles Water Board on December 5, 2013. (permit at pdf page 101)</p> <p>The interim Valencia-Newhall wastewater treatment scenario is described in further detail in a separate Los Angeles Water Board Order No. R4-2012-0139, Clean Water Act Section 401 Water Quality Certification and Waste Discharge Requirements (401 WDRs) for Newhall Land and Farming Company (File No. 11-168), adopted by the Los Angeles Water Board on September 14, 2012. Order No. R4-2012-0139, requires that: "For purposes of further treating wastewater (to a chloride level of 100 mg/l or less for up to 6000 equivalent dwelling units) from Newhall Ranch that will be sent to the Valencia WRP, Newhall Land, or its successor, shall complete construction of interim chloride and demineralization facilities to the satisfaction of the Los Angeles Water Board prior to discharging sewage from Newhall Land to the Valencia WRP or other publicly owned treatment works. The interim chloride and demineralization facilities shall be sufficient to ensure that any wastewater discharge attributable to Newhall Ranch does not result in</p>	<p>from a portion of treated effluent from the Valencia WRP before being conveyed back to the headworks of the Valencia WRP, as required by the non-NPDES WDR Order R4-2012-0139. The interim RO facility is located adjacent to the Valencia WRP on an easement property.</p> <p>Five Point determines the amount of sewage flow generated by the new homes in accordance with the Chloride Compliance Plan submitted to the Los Angeles Water Board, in association with the non-NPDES WDR Order R4-2012-0139. In the initial stages of home occupancy, when there is not sufficient flow generated by the homeowners, the sewage flow is calculated using a conservative factor from literature. Once additional homes are built and more sewage is generated, a meter will be used to quantify the flow. Five Point includes the chloride removal data in their Annual Report.</p> <p>Wastewater from the new development is temporarily being treated at the Valencia WRP. Five Point conveys the corresponding amount of tertiary treated effluent from the Valencia WRP and runs it through the interim demineralization RO unit to reduce the chloride concentrations in the permeate to well below 95 mg/L. The permeate is discharged back to the Valencia WRP influent headworks under a separate industrial permit issued by the SCVSD source control staff. The concentrated brine is trucked to the Joint Water Pollution Control Plant under a separate permit.</p>	

No.	Comment	Response	Action Taken
	<p>discharge to the Santa Clara River of effluent containing chloride in concentrations exceeding 100 mg/L. If sewage from Newhall Land does not already meet the chloride limit of 100 mg/L, an equivalent volume of effluent shall be removed from the combined Newhall/Valencia partially treated waste stream and shall be treated at the interim chloride and demineralization facility to meet 100 mg/L chloride prior to discharge.” Newhall Land will install temporary equipment and/or install facilities, at the Valencia WRP and/or adjacent to the Valencia WRP, to reduce chloride concentrations, as required by Los Angeles Water Board Order No. R4-2012-0139. Refer to the multiple Process Flow Diagrams in Attachment C to see the multiple treatment scenarios.</p> <p>Newhall may discharge the permeate (high quality product water) from the chloride reducing facility to (1) the Valencia WRP sewer system, authorized under a separate industrial user permit issued by SCVSD’s pretreatment program staff or (2) upstream of the UV disinfection process at the Valencia WRP. (pdf page, 101-102,) To our observation, the facilities outlined in the interim treatment plant schematics as referenced above as attachment C have not yet been built. However, Five Point/ Newhall/ Lennar is currently selling units in their</p>	<p>Five Point purchased the interim RO equipment, is paying for the monitoring associated with determining compliance with the chloride 100 mg/L WQO, and is paying a sewer fee to discharge the permeate to the Valencia WRP’s sewer system. Five Point customers are paying to treat the sewage from the new Five Point homes, not SCVSD customers.</p>	

Response to Comments
Valencia WRP

No.	Comment	Response	Action Taken
	<p>Mission Village/Newhall Ranch tract that must be served by those facilities.</p> <p>Please indicate how flow from this development is being monitored to meet the 100mg/l chloride limit.</p> <p>Also, we believe that the permit indicated these upgrades needed for compliance with interim waste processing were not to be paid for by Valencia Sanitation District customers. (Section E of the 2012 permit). Again, how is this requirement being monitored?</p>		
S11	<p>Errata -There appears to be a numbering error on page 61. Section 5.4.4, should be numbered as 5.3.4, unless it has been added to the wrong section?</p>	<p>The typographic error on page D-7 has been corrected.</p>	<p>Section 5.4.4 was renumbered as 5.3.4</p>

**Sanitation Districts of Los Angeles County
Thermometer Calibration Verification**

Valencia TPL

Thermometer # FE009

Usage: Effluent Sample (77 °F)

Type: LiG Spirit / Alcohol - Green

Date Issued: 12/14/2017

Calibration Valid To: 12/11/2018

Calibration Date: 12/11/2017

Calibrated By: Rachel Dominguez

Reference Thermometer Number: B55866

Reference Thermometer Reading	Tested Thermometer Reading	Correction Factor (Reference – Tested)
<hr/> 77.0° F	<hr/> 77.0° F	<hr/> 0.0°

- During daily use, add the correction factor to the reading temperature to obtain the actual temperature.

- This thermometer certification is valid up to one year from the calibration date.

- This thermometer has been calibrated by the QA group at San Jose Creek Water Quality Laboratory. Calibration was performed by comparison to a NIST traceable reference thermometer in a water bath.

- Note: This document has been hand produced by the San Jose Creek Quality Assurance group outside of the Thermometer Database.

Notify QA (Ext. 3524) of any thermometer problems. Return expired thermometers to QA for recalibration.

**Sanitation Districts of Los Angeles County
Thermometer Calibration Verification**

Valencia TPL

Thermometer # FE010

Usage: Effluent Sample (77 F)

Type: LiG Spirit / Alcohol - Green

Date Issued: 12/10/2018

Calibration Valid To: 11/27/2019

Calibration Date: 11/27/2018

Calibrated By: Jeanette Tang

Reference Thermometer Number: B55866

<u>Reference Thermometer Reading</u>	<u>Tested Thermometer Reading</u>	<u>Correction Factor (Reference - Tested)</u>
77.0° F	76.0° F	1.0

- During daily use, add the correction factor to the reading temperature to obtain the actual temperature

- This thermometer certification is valid up to one year from the calibration date.

- This thermometer has been calibrated by the QA group at the San Jose Creek Water Quality Laboratory. Calibration was accomplished by comparison to a NIST traceable reference thermometer in a water bath.

Notify QA (Ext. 3524) of any thermometer problems. Return expired thermometers to QA for recalibration.

**Sanitation Districts of Los Angeles County
Thermometer Calibration Verification Certificate**

Valencia TPL

Thermometer # FE016

Usage: Effluent Sample (77F)

Type: LiG Spirit/ Alcohol

Date Issued: 10/23/2019

Calibration Valid To: 10/18/2020

Calibration Date: 10/18/2019

Calibrated By: Leslie Raymond

Reference Thermometer Number: B55866

Reference Thermometer Reading	Tested Thermometer Reading	Correction Factor (Reference – Tested)
77.0 F	77.0 F	0.0

- During daily use, add the correction factor to the reading temperature to obtain the actual temperature.

- This verification certificate is valid up to one year from the verification date.

- This equipment has been verified by the QA group at San Jose Creek Water Quality Laboratory. Verification was done by comparing the measured digital read out temperature against a NIST traceable reference thermometer temperature reading.

- This document has been produced by the San Jose Creek Quality Assurance Group outside of the Thermometer Database.

Notify QA (Ext. 3077) for any thermometer issues. Return expired thermometers to QA for recalibration

Sanitation Districts of Los Angeles County

Thermometer Calibration Verification Certificate

Valencia Treatment Plant Laboratory

Thermometer # 181606586

Usage: Effluent Sample (77°F)

Type: Digital (Lollipop)

Date Issued: 01/15/2020

Calibration Valid To: 12/09/2020

Calibration Date: 12/09/2019

Calibrated By: Leslie Raymond

Reference Thermometer Number: B55866

Reference Thermometer Reading	Tested Thermometer Reading	Correction Factor (Reference temperature - Tested temperature)
77.0° F	77.0° F	0.0

- Upon daily use, add the correction factor to the reading temperature to obtain the actual temperature.
- This thermometer certificate is valid up to one year from the calibration date.
- This thermometer has been calibrated by the QA group at San Jose Creek Water Quality Laboratory. Calibration was accomplished by comparison of the digital read out to a NIST traceable reference thermometer.

Notify Quality Assurance at extension 3077 of any thermometer problems. Return expired thermometers to QA for recalibration.

**Sanitation Districts of Los Angeles County
Thermometer Calibration Verification**

Saugus TPL

Thermometer # FE002

Usage: Effluent Sample (77 °F)	Type: LiG Spirit / Alcohol - Green
Date Issued: 12/14/2017	Calibration Valid To: 12/11/2018
Calibration Date: 12/11/2017	Calibrated By: Rachel Dominguez
Reference Thermometer Number: B55866	

Reference Thermometer Reading	Tested Thermometer Reading	Correction Factor (Reference – Tested)
<hr/> 77.0° F	<hr/> 77.0° F	<hr/> 0.0°

- During daily use, add the correction factor to the reading temperature to obtain the actual temperature.
- This thermometer certification is valid up to one year from the calibration date.
- This thermometer has been calibrated by the QA group at San Jose Creek Water Quality Laboratory. Calibration was performed by comparison to a NIST traceable reference thermometer in a water bath.
- Note: This document has been hand produced by the San Jose Creek Quality Assurance group outside of the Thermometer Database.

Notify QA (Ext. 3524) of any thermometer problems. Return expired thermometers to QA for recalibration.

Sanitation Districts of Los Angeles County

Thermometer Calibration Verification

Saugus TPL

Thermometer # 192289346

Usage: Field Equipment (25C)

Type: Digital (Lollipop)

Date Issued: 10/23/2019

Calibration Valid To: 10/18/2020

Calibration Date: 10/18/2019

Calibrated By: Leslie Raymond

Reference Thermometer Number: B55866

<u>Reference Thermometer Reading</u>	<u>Tested Thermometer Reading</u>	<u>Correction Factor (Reference - Tested)</u>
77.0° F	77.3° F	-0.3

- During daily use, add the correction factor to the reading temperature to obtain the actual temperature

- This thermometer certification is valid up to one year from the calibration date.

- This thermometer has been calibrated by the QA group at the San Jose Creek Water Quality Laboratory. Calibration was accomplished by comparison to a NIST traceable reference thermometer in a water bath.

Notify QA (Ext. 3077) of any thermometer problems. Return expired thermometers to QA for recalibration.



LOS ANGELES COUNTY
SANITATION DISTRICTS
Converting Waste Into Resources

Thermometer Verification Certificate Saugus Treatment Plant Laboratory

QA0019

Usage: **77° F +/- 10°F**

Type: **LiG Alcohol**

Date Issued: **10/5/2020**

Verification Valid Until: **09/14/2021**

Verification Date: **09/14/2020**

Verified By: **Leslie Raymond**

Reference Thermometer Number: **B55866**

Reference Thermometer Reading	Tested Thermometer Reading	Correction Factor <small>(Reference temperature – Tested temperature)</small>
77.1° F	77.0° F	0.1

- Upon daily use add the correction factor to the thermometer reading temperature to obtain the actual temperature.
- This thermometer certificate is valid up to one year from the calibration date.
- This thermometer has been verified by the QA group at San Jose Creek Water Quality Laboratory. Verification was accomplished by comparison of thermometer temperature reading to temperature reading of reference thermometer traceable to the International Standards through the National Institute of Standards and Technology.

Notify QA (Ext. 3077) for inquiries regarding the QA Thermometer Verification Program.