

**Attachment B - WRD's Comments on Tentative NPDES Permit for GRIP-AWTF (Order No. R4-2017-xxx, NPDES No. CA0064645; CI-10317)**

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1	Various (see Attachment A)	Various (see Attachment A)	<p>In addition to referring to the GRIP-AWTF and its advanced treated recycled water as “advanced water treatment facility”, “advanced treated water”, “advanced treated recycled water”, and “advanced treated effluent”, the tentative Order also uses phrases such as “waste,” “wastewater treatment facilities”, “waste treatment and/or disposal facilities”, “wastes discharged”, and “wastewater” to characterize them. WRD requests that the tentative Order be revised to consistently refer to the GRIP-AWTF as an “advanced water treatment facility” and its discharge as “advanced treated recycled water”. In addition, many of the requirements based on wastewater treatment facilities or publicly-owned treatment works (POTWs) do not apply to GRIP-AWTF, as further elaborated in the remainder of this document. WRD respectfully requests that the provisions specifically based on and/or referencing the discharge of “waste”, wastewater treatment facilities, or treating the GRIP-AWTF as a POTW be revised or removed, if appropriate. Modifications consistent with this comment are reflected in Attachment A – Redlined Word document of the Tentative Order.</p> <p>While WRD recognizes that the form of the permit may need to be initially phrased as a “waste discharge requirement” to avoid confusion with the Regional Water Board’s authorizing statute, in this case Water Code section 13377 (authorizing issuance of NPDES permit as “waste discharge requirements”), WRD requests that the provisions avoid further characterization of the water produced as “waste,” and instead base regulatory requirements on the more applicable statutory framework for “water reclamation requirements” governing the use of “recycled water.”</p> <p>In addition, and as detailed further in this comment below, WRD would like to underscore the fact that the primary purpose of the GRIP-AWTF project is to support the beneficial use of groundwater recharge in the Central Basin by producing advanced treated recycled water for injection and spreading for groundwater replenishment purposes. Similar to a drinking water treatment plant whose source water may consist of a wastewater effluent-dominated supply but its purified product water would be referred to as drinking water, not wastewater, GRIP-AWTF’s advanced treated recycled water should not be regarded as wastewater, though its source water consists of the title 22 recycled water (tertiary treated recycled water) from the San Jose Creek Water Reclamation Plant (SJCWRP or San Jose Creek WRP).</p> <p>By way of further background, the State of California, through its repeated Legislative and regulatory mandates, has made clear that substantially augmenting the use of recycled water in California is crucial to providing for and sustaining local water supplies. Increasing the acceptance, and promoting the use, of recycled water is a recognized means for achieving those sustainable local water supplies; thus, the State, the State and Regional Water Boards, and local governments all share the same duty to promote recycled water use via protective, but <i>reasonable</i>, requirements. (See Water Code §13000) In this case, however, the tentative Order fails to further</p>

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			<p>the goals of the State as the tentative Order proposes to regulate the GRIP-ATWF as one that involves the disposal of “waste,” a characterization that will likely have a chilling effect on recycled water projects throughout the region at a time when recycled water use has the ability to substantially decrease the impact of drought conditions and improve water supply sustainability. Though State law, regulations, and policies related to recycled water require only the issuance of “water reclamation requirements” to regulate its beneficial reuse, the tentative Order is presented as “waste discharge requirements,” perhaps due to Water Code section 13377’s reference to the issuance of “waste discharge requirements” as interchangeable with issuance of a federal NPDES permit. While some use of the term “waste discharge requirements” may provide administrative ease and familiarity in the NPDES permit context, the use of the term, along with the terms “waste” and “wastewater,” when describing WRD’s recycled water, should not continue throughout the document or as a basis to impose inapplicable requirements. Given disposal of “waste” and the beneficial reuse of “recycled water” are mutually exclusive activities as defined by the Water Code, WRD seeks to minimize confusion as to the type of water being introduced for purposes of replenishing local water supplies. As such, WRD objects to the characterization of the project as one that involves the disposal of “waste,” rather than the beneficial use of “recycled water.” All references to “waste,” “wastewater,” and “waste discharge requirements” (save for a few necessary references related to the NPDES aspect of the permit), should be removed from the tentative Order, as they are not appropriate or necessary to regulate the beneficial reuse of “high quality advanced-treated recycled water.”</p> <p>While the Fact Sheet describes the GRIP-AWTF as one involving beneficial reuse of high quality recycled water, the tentative Order nonetheless includes the provisions noted in Attachment A, that instead attempt to regulate the project as the disposal of “waste.” Curiously, though, the tentative Order never specifically identifies how or why the recycled water could be or is considered a “waste,” or attempts to explain why waste discharge requirements or “waste”-related provisions are included. The tentative Order simply assumes, without justification or explanation, that the form of the permit and the references below are supported when, in fact, legal, technical and/or factual basis is lacking. Orders adopted by the Regional Water Board not supported by the findings, or findings not supported by the evidence, constitute an abuse of discretion. <i>Topanga Association for a Scenic Community v. County of Los Angeles</i>, 11 Cal.3d 506, 515; <i>California Edison v. SWRCB</i>, 116 Cal. App.3d 751, 761 (4th Dt. 1981); see also <i>In the Matter of the Petition of City and County of San Francisco, et al.</i>, State Board Order No. WQ-95-4 at page 10 (Sept. 21, 1995).</p> <p>In California, “waste” is defined as “sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation, including waste placed in containers of whatever nature prior to, and for purposes of, disposal.” (Cal. Water Code §13050(d)). “Recycled water” is defined as “water which, <b>as a result of treatment of waste</b>, is suitable for a direct beneficial use or a controlled use that would not otherwise occur and is therefore <b>considered a valuable resource</b>.” (Cal. Water Code §13050(n) (emphasis added).) Importantly, “waste” cannot</p>

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			<p>be “recycled water,” and “recycled water” by definition is not a “waste.” Therefore, for purposes of regulatory actions, the Regional Water Board must define the activity as one or the other, and regulate accordingly.</p> <p>The Water Code creates two distinct regulatory schemes for regulating “waste” disposal and the beneficial reuse of “recycled water.” “Waste” disposal is regulated by Chapter 4, Article 4 of the Porter-Cologne Water Quality Control Act (Water Code sections 13260 – 13275), with Water Code section 13263 prescribing the issuance of “waste discharge requirements” (“WDRs”) for regulation and control. Beneficial reuse of “recycled water” is regulated by an entirely separate section of Porter-Cologne; specifically, Chapter 7, Article 7 (amongst other articles), with Water Code section 13523 prescribing the issuance of “water reclamation requirements” for recycled water projects. A significant difference between the two schemes is that the Division of Drinking Water (DDW) (formerly the California Department of Public Health) plays a major role in the definition of what constitutes “recycled water,” and the regulation of recycled water projects, as DDW is the state agency charged with adopting regulations to address all aspects of recycled water conditions, treatment, operations, and use restrictions. (See Water Code §§ 13520, 13521 (authorizing DDW to establish uniform statewide recycling criteria), 13523 (requiring water reclamation requirements be in conformance with DDW’s recycling criteria), 13562 (authorizing DDW to establish uniform water recycling criteria for indirect potable reuse for groundwater recharge), and 13563-13566 (authorizing DDW to investigate the feasibility of developing uniform water recycling criteria for direct potable reuse).) It is the prescribed level of treatment required by DDW pursuant to the uniform recycling criteria that transforms domestic wastewater from being legally considered a “waste” to being considered “recycled water” for regulatory purposes. In this case, WRD will be employing such a high level of treatment, the water produced is clearly “recycled water” as that term is defined in the Water Code.</p> <p>Per the Legislature’s expressly adopted language, if a recycled water project meets DDW’s requirements and is acceptable based on protection of human health, the recycled water project should proceed without obstacle; in fact, water reclamation requirements may not even be required if both agencies (DDW and the Regional Water Board) see no need to add to the existing regulatory requirements imposed by DDW on a specific project. (See Water Code §13523(b) (“each regional board, after ... [consulting with DDW] ... shall, if in the judgment of the board, it is necessary to protect the public health, safety, or welfare, prescribe water reclamation requirements for water that is used or proposed to be used for recycled water.”); see also State Water Resources Control Board’s Recycled Water Policy, Resolution No. 2009-0011, (“Regional Water Boards shall appropriately rely on the expertise of DDW for the establishment or permit conditions needed to protect human health.”) Troubling, then, is the tentative Order, which conflicts with the Legislature’s clear distinction between the regulation of “waste” disposal and beneficial use of “recycled water,” and uses the concept of regulating “waste” as a justification for additional, unnecessary layers of regulatory requirements. WRD presumes the Legislature’s repeated proclamations of the safety of recycled water (see, e.g., Water Code § 13576) and the</p>

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			<p>regulatory/permitting distinctions between “waste” disposal and “recycled water” use, are meaningful and should be respected.</p> <p>Moreover, the distinction between “waste” disposal and beneficial reuse of “recycled water” is critical to securing public acceptability of increased recycled water use. Given previous Legislative goals for water recycling, and the State Water Resources Control Board’s recently enunciated goal, as stated in the Recycled Water Policy, to increase the use of recycled water in the state over 2002 levels by at least 1,000,000 acre-feet per year by 2020 and by at least 2,000,000 acre-feet per year by 2030, promoting the safety and acceptability of recycled water is crucial. (See Water Code §§13560(a), 13577.) Refraining from calling recycled water a “waste” would aid in the pursuit of the State Water Resources Control Board’s goals, while at the same time ensuring consistency with law.</p> <p>Other relevant Water Code provisions support the WRD’s position:</p> <ul style="list-style-type: none"> <li>• Water Code section 13511 states “[t]he Legislature finds and declares that a substantial portion of the future water requirements of this state may be economically met by beneficial reuse of <i>recycled water</i>.” (emphasis added) Water Code section 13512 declares that “[i]t is the intention of the Legislature that the state undertakes all possible steps to encourage development of water recycling facilities so that <i>recycled water</i> may be made available to help meet the growing water requirements of the state.” (emphasis added).</li> <li>• As early as 1974, California law provided that the State’s interest in conservation of water resources required the maximum reuse of reclaimed water<sup>1</sup> in the satisfaction of requirements for beneficial uses of water. (Water Reuse Law, Water Code Sections 461-465.) Under this law, the Department of Water Resources (“DWR”) was instructed to study the availability and quality of wastewater and the uses of reclaimed water for beneficial purposes, including, but not limited to, groundwater recharge, municipal and industrial use, irrigation use, and cooling for thermal electric power plants. (Water Code §462.) In 1977, the State Water Resources Control Board adopted Resolution 77-1, which echoed the findings set forth in Water Code section 13512 related to the State’s primary interest in the development of facilities to reclaim water containing waste to supplement existing surface and underground water supplies.</li> <li>• In 1996, CDPH (now DDW) and the State Water Resources Control Board entered into a Memorandum of Agreement (MOA) regarding the use of reclaimed water. One of the primary missions of CDPH was “advising RWQCBs in the drafting of water reclamation requirements (permits),” and regional water boards were charged with the “issuance and enforcement of water reclamation requirements to producers and users of reclaimed water.” (See MOA at pg. 2.) This MOA stated that “[p]lanned indirect potable reuse of</li> </ul>

<sup>1</sup> Under Water Code section 26, “recycled water” and “reclaimed water” have the same meaning as “recycled water” in Water Code section 13050(n).

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			<p>reclaimed water is commonly practiced in California through artificial ground water recharge with reclaimed water.” (See MOA at pg. 4.) Notably, the issuance of waste discharge requirements was not discussed.</p> <ul style="list-style-type: none"> <li>• The State Water Resources Control Board adopted a Strategic Plan Update for 2008-2012, which included a priority to increase, by 2015, the amount of sustainable local water supplies (e.g., recycled water) available for meeting existing and future beneficial uses by 1,725,000 acre-feet per year.</li> <li>• In 2009, the State Water Resources Control Board adopted a statewide Recycled Water Policy (State Water Board Resolution No. 2009-0011) intended to ensure statewide regulatory consistency for recycled water projects and support the recycled water priorities set forth in the Strategic Plan. The Recycled Water Policy declares that “when used in compliance with this Policy, Title 22 and all applicable state and federal water quality laws, <b>the State Water Board finds that recycled water is safe for approved uses, and strongly supports recycled water as a safe alternative to potable water for such approved uses.</b>” (See State Water Board Resolution No. 2009-0011) (emphasis added)</li> <li>• The Recycled Water Policy expressly states that: “<b>Groundwater recharge with recycled water</b> for later extraction and use in accordance with this Policy and state and federal water quality law <b>is to the benefit of the people of the state of California.</b>”</li> <li>• In 2010, the Legislature adopted the Direct and Indirect Potable Reuse Law. (Water Code §§ 13560, <i>et seq.</i>) This law determined that the “use of recycled water for indirect potable reuse [IPR] is critical to achieving the state board’s goals for increased use of recycled water in the state” and that if “direct potable reuse [DPR] can be demonstrated to be safe and feasible, implementing direct potable reuse would further aid in achieving the state board’s recycling goals.” (Water Code §13560(c).) As a result, uniform recycling water recycling criteria were adopted and effective on June 18, 2014 for indirect potable reuse for groundwater recharge, which are the applicable state-law requirements in this case.</li> </ul>
2	Table 2		<p>In Table 2, “tertiary treated effluent” appears under the effluent description (second column). This is inaccurate and should be changed to “advanced treated recycled water”. Tertiary treated recycled water will be blended with GRIP-AWTF’s “advanced treated recycled water” prior to discharge, as noted in the Fact Sheet; however, the generation of that tertiary treated water is not regulated by the GRIP-AWTF’s tentative Order (or treated by the GRIP-AWTF treatment system). Instead, the Regional Water Board has issued separate permit requirements to County Sanitation Districts of Los Angeles County (LACSD) for the San Jose Creek WRP that authorize and regulate that discharge. As such, “tertiary treated effluent” should not be considered the “Effluent Description” in the context of the tentative Order for the GRIP-AWTF produced advanced treated recycled water.</p> <p>Further, the discharge regulated by the tentative Order is not of “effluent,” but rather, is “recycled water.” (Effluent is defined by the United States Environmental Protection Agency (USEPA) as “wastewater - treated or untreated - that flows out of a treatment plant, sewer, or industrial outfall.”)</p>

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			<p><i>Generally refers to wastes discharged into surface waters".</i>) If the Regional Water Board prefers to characterize the discharge from the GRIP-AWTF as a "blend of tertiary treated recycled water and advanced treated recycled water", WRD could accept that description. Regardless, the heading of the second column should be changed from "Effluent Description" to "Discharge Description". Modifications consistent with this comment are reflected in Attachment A.</p>
3	Table 3, VI.C.3.b, and MRP	2, 17, E-2, and E-18	<p>The second row under Table 3 states "This Order shall become effective on: November 1, 2017". Since the GRIP-AWTF will not be constructed by then, WRD requests the following modifications:</p> <p>1) Please add the following language at the beginning of Attachment E, section I: <u>"a. The provisions of this monitoring and reporting program become applicable once the GRIP-ATWF becomes operational and produces a discharge. Until that time, the Discharger shall submit monthly reports indicating no discharge."</u></p> <p>2) Please modify the first sentence of the second paragraph under section VI.C.3.c, as follows: <u>As of the effective date of the monitoring and reporting program, tThe Permittee shall develop and conduct a PMP..."</u></p> <p>3) Please modify the first sentence under Attachment E, section V.A.6, as follows: "The Permittee shall prepare and submit a copy of the Permittee's initial investigation TRE work plan to the Executive Officer of the Regional Water Board for approval within 90 days of the effective date of this <u>permit monitoring and reporting program.</u>" Modifications consistent with these comments are reflected in Attachment A.</p>
4	IV.A.1.a Table 4 (and Fact Sheet sections III.C.6., III.E.3.,IV.B., and IV.C.)	5, F-10, F-12, F-15 to F-34, F-49	<p>WRD requests the removal of the technology-based effluent limitations ("TBELs") for BOD<sub>5</sub>, total suspended solids, turbidity, pH, settleable solids, oil &amp; grease, and total coliform, which are TBELs based on secondary and/or tertiary treatment technology, or derived from "best professional judgment." As noted in the Fact Sheet, at sections III.C., III.E.3, IV.B., and IV.C., the Regional Water Board is imposing these inapplicable technology-based limitations on the flawed basis that because the GRIP-AWTF's source water is tertiary treated recycled water (once derived from municipal wastewater) from the San Jose Creek WRP, which is a "publicly owned treatment works" ("POTW"), the GRIP-AWTF must be considered "part of the POTW" and therefore, subject to all the TBELs and other restrictions applicable to a POTW. This rationale is not factually supported and unreasonable, in contravention of Water Code section 13000. The Regional Water Board is basing the imposition of TBELs as follows: (1) for BOD<sub>5</sub> and TSS, the limitations are based on the minimum level of effluent quality attainable by secondary treatment and values associated with tertiary treatment. See Fact Sheet at IV.B. (p. F-14-15) (with the tertiary treatment-related requirements being imposed on the incorrect basis that the GRIP-AWTF is "similar" to a tertiary treatment wastewater treatment system; notwithstanding these findings, the Regional Water Board later states that removal efficiency requirements for BOD<sub>5</sub> and TSS applicable to POTWs do "not apply to GRIP-AWTF" since "the BOD<sub>5</sub> and TSS have already been removed and the effluent limitations have consistently been met at the San Jose Creek WRPs..." see Fact Sheet at IV.D.3 (p. F-43)); (2) for pH, the limitations are based on the same technology-based standards as cited for BOD<sub>5</sub> and TSS; later discussion of the Basin Plan's water quality objective for pH does not justify the limitations because the tentative Order already contains a receiving water limitation to protect surface waters consistent with the water</p>

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			<p>quality objective (see Fact Sheet at IV.C.2.b.ii. (p. F-16)); (3) for total coliform, the limitations are based on the performance of a POTW implementing tertiary treatment-related requirements, established by the now Division of Drinking Water (see Fact Sheet at IV.C.2.x.a. (p. F-26-27)) (where the Regional Water Board incorrectly characterizes the GRIP-AWTF as a “wastewater treatment plant,” where “pathogens are likely to be present in the effluent in cases where the disinfection process is not operating adequately.”); (4) for turbidity, the limitations are based on the same Division of Drinking Water regulations associated with the performance of tertiary-treatment technology at a POTW (see Fact Sheet at IV.C.2.xii (p. F-28)), and (5) for oil &amp; grease and settleable solids, the limitations are referenced repeatedly as TBELs, yet no technology-based derivation exists to impose such limitations; receiving water limitations at Section V.A. adequately protect the receiving waters from the concerns expressed by Regional Water Board staff at Fact Sheet page F-17 as a basis for imposing effluent limitations, and discharge limitations are unnecessary. None of the bases for imposing the proposed TBELs are appropriate, as discussed below, and WRD requests that these effluent limitations and all associated references be removed from the tentative Order prior to adoption.</p> <p>Contrary to Regional Water Board staff’s statements, the GRIP-AWTF is not a part of the Los Angeles County Sanitation District’s POTW system, and technology-based requirements related to secondary (Clean Water Act) and/or tertiary (Title 22, otherwise) treatment applicable to the POTW in this case (LACSD via the San Jose Creek WRP), are not automatically applicable to the GRIP-AWTF project simply because it seeks to access the finished tertiary treated recycled water so as to treat it further for enhanced beneficial use (groundwater recharge and/or indirect potable reuse). WRD’s proposed activity does not legally transform WRD into a POTW, as that term is defined in federal law at 40 C.F.R. §§122.2 and 403.3, because the water WRD is accessing is no longer “municipal sewage or industrial waste.” Technology-based requirements applicable to POTWs do not spring into applicability simply because WRD further handles water that has already been subject to such technology-based requirements at the appropriate location (collection system and the NPDES permit applicable to the San Jose Creek WRP). In other areas of the tentative Order, the Regional Water Board appears to recognize this (see Fact Sheet at VI.B.5., noting that special provisions for POTWs are not applicable, “since GRIP-AWTF is not a POTW.”)</p> <p>Further, 40 C.F.R. § 122.44(a)(1) requires NPDES permits to include “applicable” technology-based requirements; there are no applicable technology-based requirements (promulgated under Clean Water Act section 301(b)) applicable to the activities undertaken by WRD; those that may have applied earlier in the treatment process have already been satisfied via the NPDES permit issued for the San Jose Creek WRP. For this reason, WRD requests that all technology-based effluent limitations or other requirements related to operation of a POTW be removed. In their place, Regional Water Board staff can indicate in appropriate sections of the tentative Order that the treatment employed as required by the San Jose Creek WRP NPDES Permit and Monitoring and Reporting Program (MRP) previously satisfied any such requirements. Of course, the</p>

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			tentative Order can continue imposing relevant water quality-based requirements. Modifications consistent with this comment are reflected in Attachment A.
5	IV.A.1.a, Table 4 (Chronic Toxicity)	7	Numeric effluent limitations are included in Table 4 for chronic toxicity, based on Pass/Fail and % Effect (Test of Significant Toxicity), none of which are authorized. Given the complexity of the issues and the comment length, please see WRD's comments on the tentative Order's proposed requirements for chronic toxicity in the enclosed Attachment C. Other tentative Order provisions relevant to WRD's comments are sections V.A.19. (receiving water limitations), VII.J. (compliance determination), Attachment E (chronic toxicity monitoring requirements), and Attachment F. Modifications consistent with the comments in Attachment C are reflected in Attachment A.
6	IV.A.1.a.1., Table 4 (Mass Limits)	5 to 9, F-38	The tentative Order prescribes effluent limitations in both mass and concentration for a variety of constituents set forth in Table 4. The mass limitations are based on the plant design flow rate of 14.8 mgd and the prescribed concentration limit. Federal regulations state that mass limits are not required "when applicable standards and limitations are expressed in terms of other units of measurement," such as concentration. (See 40 C.F.R. §§122.45(f)(1)(ii) and (f)(2)) Given the type of project involved here (contrary to the Fact Sheet at p. F-37, mass limitations are not necessary here to ensure proper treatment like for a POTW), and the fact that the constituents are already regulated by concentration (and the plant design flow rate), WRD requests the Regional Water Board elect to decline to impose dual mass limitations as unnecessary to regulate the facility. If the Regional Water Board is concerned about mass loading, the monitoring and reporting program could require WRD to submit the calculated mass result for each constituent, so that the information is available. Modifications consistent with the comments in Attachment C are reflected in Attachment A.
7	VI.A.2.a; VI.A.2.b ~ VI.A.2.e; VI.A.2.i, VI.A.2.k.	12 to 13	<p>The provision at section VI.A.2.a., which states, "Neither the treatment nor the discharge or pollutants shall create a pollution, contamination, or nuisance as defined by section 13050 of the CWC," should be removed. This provision is entirely duplicative of Discharge Prohibition III.E. Similarly, the provision at VI.A.2.i. is entirely duplicative of Discharge Prohibition III.A; therefore, section VI.A.2.i. should be removed. The following statements under section VI.A.2 apply specifically to POTWs that operate collection systems and are not relevant to the GRIP-AWTF. WRD requests the deletion of the following provisions:</p> <ul style="list-style-type: none"> <li>b. Odors, vectors, and other nuisances of sewage or sludge origin beyond the limits of the treatment plant site or the sewage collection system due to improper operation of facilities, as determined by the Regional Water Board, are prohibited.</li> <li>c. All facilities used for collection, transport, treatment, or disposal of wastes shall be adequately protected against damage resulting from overflow, washout, or inundation from a storm or flood having a recurrence interval of once in 100 years.</li> <li>d. Collection, treatment, and disposal systems shall be operated in a manner that precludes or impedes public contact with wastewater.</li> <li>e. Collected screenings, sludges, and other solids removed from liquid wastes shall be disposed of in a manner approved by the Executive Officer of the Regional Water Board.</li> </ul>

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			<p>Provision VI.A.2.k. makes reference to operation of a “waste disposal facility,” which the GRIP-AWTF is not. If the Regional Water Board wants to retain this provision, WRD requests that this section be re-phrased as follows: “These requirements do not exempt the operator of the <del>waste disposal</del> facility from compliance with any other laws, regulations, or ordinances which may be applicable; they do not legalize this <del>waste disposal</del> facility; and they leave unaffected any further restraints on the <del>disposal of wastes</del> <u>treatment of water</u> at this site which may be contained in other statutes or required by other agencies.” Modifications consistent with this comment are reflected in Attachment A.</p>
8	VI.C.1	16	<p>The Fact Sheet states that once the GRIP-AWTF has established its own dataset, the effluent limitations may be recalculated using the GRIP-AWTF data and the permit may be reopened to incorporate the new effluent limitations for GRIP-AWTF, if warranted. In light of that statement, WRD requests that the following provision be added to the very end of section VI.C.1: “This Order may be reopened or modified, to revise effluent limitations once the GRIP-AWTF has established its own dataset sufficient to allow recalculation of the CTR-based effluent limitations, which are currently based on the SJCWRP’s discharge data.” Modifications consistent with this comment are reflected in Attachment A.</p>
9	VI.C.2.b	16	<p>WRD requests that the heading for section VI.C.2.b be revised to “b. Treatment Plant Capacity – <u>Not Applicable</u>” and that all of the language under this heading be removed, for reasons discussed herein regarding WRD and the GRIP-AWTF being treated as a POTW, and below. The provision states, “The Permittee shall submit a written report to the Executive Officer of the Regional Water Board within 90 days after the “30-day (monthly) average” daily dry-weather flow equals or exceeds 75 percent of the design capacity of waste treatment and/or disposal facilities...” This provision applies specifically to POTWs and should not apply to GRIP AWTF. POTWs are considered “critical facilities” in that they represent man-made structures which because of their function, size, service area, or uniqueness have the potential to cause serious bodily harm, extensive property damage, or disruption of vital socioeconomic activities if they are destroyed, damaged, or if their services are repeatedly interrupted. Ensuring adequate treatment plant capacity of POTW is necessary to prevent potential detrimental impacts to public health and safety resulting from discharge of inadequately treated sewage. A POTW must be designed with sufficient treatment capacity to be able to fully accommodate all wastewater flows from a sewershed area under reasonable conditions, with sufficient available capacity to consider various factors that could potentially lead to an increased influent volume, such as projected population growth.</p> <p>GRIP-AWTF does not fall into the “critical facilities” category. First, the interruption in or shut down of GRIP-AWTF operation will not result in: the discharge of inadequately treated water, impairment of receiving water, or detrimental impact on public health or safety. GRIP AWTF’s source water, which is SJCWRP’s tertiary treated effluent, is currently regulated under a separate NPDES permit and separate Water Recycling Requirements (WRRs). GRIP-AWTF provides additional treatment to further purify the quality of this source water so as to beneficially reuse the resource. However, even without this additional treatment, the source water is already adequately treated for surface water discharge and for decades has been used safely for</p>

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			<p>groundwater recharge. Second, GRIP-AWTF has full control over and could limit the amount of source water that comes into the facility to ensure that the design treatment capacity is not exceeded. Therefore, the planning for plant treatment capacity should not be based on the “75 percent of the design capacity of waste treatment and/or disposal facilities” but should be left to WRD’s discretion and its groundwater replenishment goals and needs.</p> <p>Furthermore, WRD would like to note that this provision on the treatment plant capacity study is not found in the West Basin Municipal Water District (WBMWD)’s Juanita Millender-McDonald Carson Regional Water Recycling Plant’s NPDES permit (Order No. R4-2013-0046; NPDES No. CA0064246) and is noted as “Not Applicable” in the WBMWD’s Edward C. Little Water Recycling Plant’s NPDES permit ((R4-2012-0026; NPDES No. CA0063401). Both of these water recycling plants produce purified recycled water for various beneficial uses. Modifications consistent with this comment are reflected in Attachment A.</p>
10	VI.C.3.a	17 and Attachment H	<p>WRD has sought coverage for the GRIP-AWTF under the statewide General Construction Activities Stormwater Permit (WDID No. 4 19C373780), and as part of the permit requirements, has prepared a Storm Water Pollution Prevention Plan (SWPPP). Once the construction is completed and prior to the facility operation, WRD will seek coverage for the GRIP-AWTF under the statewide General Industrial Activities Stormwater Permit and will comply with the necessary requirements, including preparation of a SWPPP. As such, the inclusion of the SWPPP requirement in this Order is deemed redundant and unnecessary. Therefore, WRD requests that the heading for this section be revised to read, “Storm Water Pollution Prevention Plan (SWPPP) – <u>Not Applicable</u>” and that all associated languages under this provision and Attachment H (Storm Water Pollution Prevention Plan Requirements) be removed. Modifications consistent with this comment are reflected in Attachment A.</p>
11	VI.C.3.b	17	<p>WRD requests that the heading for this section be revised to read “Spill Clean-up Contingency Plan (SCCP) - <u>Not Applicable</u>”, and that all associated languages under this section be removed because the requirements under this section are intended to apply to POTWs and not an advanced treatment water facility, such as the GRIP-AWTF. This provision states, “Within 90 days of the effective date of this Order, the Permittee is required to submit a SCCP, which describes the activities and protocols to address clean-up of spills, overflows, and bypasses of untreated or partially treated wastewater from the Permittee’s treatment facilities that reach water bodies, including dry channels and beach sands. At a minimum, the plan shall include sections on spill clean-up and containment measures, public notification, and monitoring.” As mentioned in comment #9, GRIP AWTF’s source water will consist of the SJCWRP’s tertiary treated recycled water, which is currently regulated under a separate NPDES permit and separate Water Recycling Requirements (WRRs). GRIP-AWTF provides additional treatment to further purify the recycled water. However, even without this additional treatment, the source water is already adequately treated for surface water discharge and for decades has been used safely for groundwater recharge. Therefore, any spill or overflow of this source water should not be considered “untreated or partially treated wastewater” and should not trigger spill clean-up and containment measure, public notification and monitoring requirements. Therefore, the</p>

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			requirements of this provision are considered not applicable to GRIP-AWTF. Modifications consistent with these comments are reflected in Attachment A.
12	VI.C.4.b & c	18	WRD requests the deletion of these provisions (VI.C.4.b & c), which are deemed not applicable to GRIP-AWTF, as further explained below. Section VI.C.4.b states, "The Permittee shall maintain in good working order a sufficient alternate power source for operating the wastewater treatment and disposal facilities." As previously stated, GRIP-AWTF is not a wastewater treatment and disposal facility. Also, since it does not fall into the "critical facilities" category, having sufficient alternate power and standby or emergency power facilities is not as critical as it is for a POTW. Also, Section VI.C.4.c states, "The Permittee shall provide standby or emergency power facilities and/or storage capacity or other means so that in the event of plant upset or outage due to power failure or other cause, discharge of raw or inadequately treated sewage does not occur." Since the GRIP-AWTF's source water consists of tertiary treated recycled water, any potential power outage or failure will not result in a discharge of raw or inadequately treated sewage. In place of the deleted provisions, WRD recommends the inclusion of the following language found in the WBMWD's Edward C. Little Water Recycling Plant's NPDES permit ((R4-2012-0026; NPDES No. CA0063401): " <u>The Discharger shall provide safeguards to assure that, should there be a reduction, loss, or failure of electric power, the Discharger shall comply with the terms and conditions of this Order/Permit. Such safeguards may include alternate power sources, standby generators, retention capacity, operating procedures, or other means.</u> " Modifications consistent with this comment are reflected in Attachment A.
13	VI.C.6.a	19	With respect to the provision requiring notification of "Regional Water Board and County Health or the local health department, if applicable, by telephone or electronic means of an unauthorized discharge of more than fifty thousand (>50,000) gallons of tertiary recycled water," WRD seeks clarity as to when this provision is triggered. The Fact Sheet, sections II.A and II.B, specifically state that the discharge from GRIP-AWTF will consist of advanced treated recycled water that is blended with tertiary treated recycled water from the equalization tank that flows over a weir back into the 66-inch pipeline. Therefore, WRD's understanding is that discharge of tertiary treated recycled water from the equalization tank is allowed by this Order and not subject to the requirements of this provision.
14	VI.C.6.b	19	WRD requests the deletion of this provision, as further explained below. This provision on Minor Spills (less than 50,000 gallons) states, "The Permittee shall immediately (but no later than two hours) notify the Regional Water Board of an unauthorized discharge of less than fifty thousand (<50,000) gallons of tertiary recycled water. Written confirmation must be provided electronically (e.g., email or fax) to all agencies within three (3) business days from the date of notification...." Water Code section 13529.2 specifies that notification requirements for unauthorized discharges of tertiary-treated recycled water apply when the volume of recycled water reaches 50,000 gallons or more (the volume is set at 50,000 gallons or more given the high quality of the water). Thus, there is no basis for requiring notification for volumes less than 50,000 gallons, and imposing such a requirement for such high quality discharges is unreasonable and inconsistent with the mandates of Water Code section 13000 (requiring that all terms of orders issued by the Regional Water Board be "reasonable.") Such notification is an unnecessary burden, and

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			inconsistent with the Legislature's mandate. Modifications consistent with this comment are reflected in Attachment A.
15	Attachment D, Various	D-4, D-6	Attachment D includes references to 40 C.F.R. part 136. WRD would like to incorporate by reference comment #17, which requests to add the option of utilizing 40 CFR part 141 to conduct the required water quality analyses, in addition to 40 CFR part 136. Modifications consistent with this comment are reflected in Attachment A.
16	Attachment D, Various	D-6, D-7, D-9	WRD understands that Standard Provisions are general requirements and may contain information that may not pertain to a particular facility. At the same time, for the record, WRD would like to note that Attachment D contains requirements that relate to combined sewer overflows, sanitary sewer overflows, sludge, or POTWs, which are not applicable to GRIP-AWTF, and therefore recommend their deletion to avoid potential confusion. Modifications consistent with this comment are reflected in Attachment A.
<b>Attachment E</b>			
17	I.B and various	E-2 and various	WRD requests that the existing language be revised to read, "Pollutants shall be analyzed using the analytical methods described in 40 CFR parts 136.3, 136.4, 136.5 or 141; or where no methods are specified for a given pollutant, by methods approved by this Regional Water Board or the State Water Board." in order to also add the option of utilizing part 141 to conduct the required analyses. WRD recognizes that NPDES permitting falls under the Clean Water Act regulations, which require the use of wastewater analytical methods. However, we would like to underscore the fact that the discharge from GRIP AWTF will also be regulated under the Waste Discharge Requirements/Water Recycling Requirements (WDRs/WRRs), which will contain DDW's requirements for using drinking water methods for the same constituents required to be monitored under this Order. For example, please refer to the Alamitos Barrier WDRs/WRRs Order No. 2014-0111 - see language under MRP.II.5 and also DDW's condition #10. As such, WRD would like to request a more flexible language that allows the use of either 40 CFR part 136 or part 141 methods, in order to avoid potential costly redundancy. WRD will ensure that any drinking water analytical methods used for analysis will meet the SWRCB's MLs specified for the wastewater analytical methods. This comment also applies to all other reference to 40 CFR part 136 in this order. Modifications consistent with this comment are reflected in Attachment A.
18	I.M	E-4	WRD requests that the recycled water flow from the equalization tank to the diversion structure, which is specifically authorized by this Order, not be considered an overflow, spill, or bypass for purposes of enforcement and implementation of provisions under this Order. The Equalization tank has been designed to allow the release of a certain volume of tertiary treated recycled water so that it may be blended with the advanced treated recycled water to achieve a desired blend ratio (e.g., 25% tertiary treated recycled water vs. 75% advanced treated recycled water). As such, WRD requests that the language in Attachment E, section I.M be modified as follows: "The Permittee shall develop and maintain a record of all spills or bypasses of tertiary treated recycled water from GRIP-AWTF and its conveyance pipeline according to the requirements in the WDR section of this Order. This record shall be made available to the Regional Water Board upon request and a spill summary shall be included in the annual summary report. <u>For the purpose of implementing this provision, the flow of tertiary treated recycled water from the equalization tank</u>

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			to the diversion structure, which is specifically authorized by this Order, will not be considered an overflow, spill, or bypass." On the other hand, if the Regional Water Board wishes the total monthly flow of the tertiary treated recycled water discharged from the equalization tank to be reported in the monthly reports, WRD could agree to reporting this data as part of flow (and not spill) monitoring.
19	II. Table E-1	E-5	Per comment #20, WRD requests that, in order to avoid duplicative reporting, the statement associated with INF-001 in Table E-1 should be modified as follows: "The calculated flow-weighted concentrations of the effluent reported for EFF-001, EFF001A, and EFF-001B <u>from the San Jose Creek WRP Order No. R4-2015-0070 (NPDES Permit No. CA0053911) is the influent concentration that will be reported for the GRIP-AWTF.</u> " In addition, per comment #22, WRD requests the deletion of the receiving water monitoring stations and the TMDL stream flow monitoring stations from Table E-1. Modifications consistent with this comment are reflected in Attachment A.
20	III.A.1 Table E-2	E-10	<p>WRD requests the deletion of all constituents other than flow in Table E-2 (Influent Monitoring). As acknowledged in the paragraph preceding Table E-2, the water quality of the GRIP-AWTF influent is equivalent to the SJCWRP's tertiary treated recycled water, which is routinely monitored and reported by LACSD under SJCWRP's Order No. R4-2015-0070 (NPDES Permit No. CA0053911). LACSD's reporting includes the data for the SJCWRP-East discharge, SJCWRP-West discharge, and their flow-weighted calculations for the combined discharge to Discharge Outfalls 001A, 001B, or 001. If WRD has to also report the same calculated flow-weighted concentration data, it runs the risk of late reporting since the data has to be first received from the LACSD, which will happen either on or very close to the submission due date. WRD respectfully requests that the requirement for this duplicative reporting be removed. Accordingly, WRD recommends that the language preceding Table E-2 be modified as follows: "The Discharger shall monitor influent <u>flow</u> to the facility at INF-001 described in Table E-1. <del>Monitoring requirements listed below may duplicate existing requirements under Waste Discharge Requirements Order No. R4-2015-0070 (NPDES Permit No. CA0053911) for the San Jose Creek WRPs. The San Jose Creek WRPs combined effluent tertiary treated recycled water is the influent water going to for the GRIP-AWTF. Therefore, the effluent results from SJCWRP will be accepted as equivalent to the influent monitoring requirements of the GRIP-AWTF for the parameters listed below. the discharge monitoring results generated and submitted by LACSD under SJCWRP's Order No. R4-2015-0070 (NPDES Permit No. CA0053911) is deemed representative of the GRIP-AWTF's influent water quality, and therefore a separate pollutant monitoring and reporting is not prescribed for the GRIP-AWTF's influent.</del>" The Regional Water Board took a similar action in Order No. 2014-0111 (Alamitos Barrier permit). The MRP associated with the Order only required influent flow monitoring and reporting since the source water, Long Beach Water Reclamation Plant's tertiary treated water, is routinely monitored by LACSD under a separate NPDES permit. Modifications consistent with this comment are reflected in Attachment A.</p> <p>Should the influent pollutant monitoring/reporting requirements be retained notwithstanding WRD's request above, WRD asks that the Regional Water Board allow additional 30 days for</p>

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			influent data reporting, beyond the due dates specified in Table E-8, to allow sufficient time for WRD to receive the required data from the LACSD, which could be easily accomplished by adding a clarifying footnote to Table E-8. The suggested footnote language is reflected in Attachment A. Also, since this influent data comes from the flow weighted data for the SJC Outfall, the constituents listed as "24-hour composites" should instead be listed as "calculated".
21	IV.B, Table E-3; VIII.A, Table E-5	E-11, E-12, E-22	Per comment #4 (in which WRD requests the removal of the TBELs for BOD <sub>5</sub> , total suspended solids, turbidity, pH, settleable solids, oil and grease, and total coliform), please remove BOD <sub>5</sub> , total suspended solids, turbidity, pH, settleable solids, oil and grease, and total coliform from effluent monitoring in Table E-3 and (should receiving water monitoring and reporting requirements be retained notwithstanding WRD's comment #23) receiving water monitoring in Table E-5.
21.5	IV.B.1 Table E-3	E-12	<p>WRD requests the removal of the requirement for a continuous total residual chlorine recorder of the final product water prior to blending with tertiary. Since the daily grab samples are to be used for compliance and follow-up purposes, and to eliminate potential data discrepancies between the recorder and grab samples, and because of the strict total chlorine residual control processes being implemented at GRIP to ensure low total chlorine residual (see next paragraph), the additional continuous recorder should not be required and would cause an unnecessary burden on the project.</p> <p>As will be described Section 3.2.2 of the re-submitted Title 22 Engineering Report, at the GRIP site the dosing rate of sodium bisulfate will be automatically controlled through the plant control system. The chlorine residual is monitored just prior to the UV system. The target free chlorine residual is 2.0 mg/L. The flow from the UV system then moves to the post treatment area where a portion of the flow is sent through the decarbonator and the remainder bypasses the decarbonator. Calcium Hydroxide and Sodium Hydroxide are then added to the combined flow before it enters the Product Water Tank. In order to prevent bio growth in the Product Tank, the chlorine residual is maintained in the tank. Because the Product Pumps, which pump water to the Supplemental Recharge Wells (SRW), are located on the top of the Product Tank, the product water to these SRW wells will also have a chlorine residual of approximately 1.0 to 2.0 mg/L. Product water delivered to the spreading basins flows over the weir in the Product Water Tank then flows by gravity pipeline to the diversion structure where it mixes with tertiary water and subsequently goes to the San Gabriel River or spreading basins. As the Product Water flows over the weir, sodium bisulfite (NaHSO<sub>3</sub>) is added to dechlorinate the water. The dechlorination reactions, using sodium bisulfite proceeds very rapidly to completion and follows the equation: <b>NaHSO<sub>3</sub> + HOCl → 2H<sup>+</sup> + SO<sub>4</sub><sup>=</sup> + Cl<sup>-</sup> + Na<sup>+</sup></b>. On a weigh-to-weigh basis, approximately 1.5 mg of sodium bisulfite is required to dechlorinate 1.0 mg of free chlorine. The sodium bisulfite dose rate will be controlled automatically using flow and influent UVAOP chlorine residual values at a minimum of a 1.5:1 weight ratio. Daily grab samples of dechlorinated effluent will be performed to verify that chlorine residual is consistently less than 0.1 mg/L.</p>
22	IV.B.1 Table E-3, Footnote 6	E-12	Should the continuous monitoring of total residual chlorine using an online analyzer be required notwithstanding WRD's request for its deletion in comment #21.5, WRD has the following

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			<p>additional comment. The fourth sentence in Footnote 6 of Table E-3 states, "In addition, calibration records for the TRC analyzer shall be submitted quarterly." Typically, calibration records are required to be maintained at a facility, to be made available to the Regional Water Board staff during an inspection, and/or to be submitted upon request from the Regional Water Board. WRD would appreciate an explanation as to why the calibration records for the analyzer are being required to be submitted quarterly.</p>
23	VIII and IX	E-21 to E-25	<p>WRD appreciates the Regional Water Board's intent to avoid duplicative monitoring efforts between permits with overlapping receiving monitoring stations. As noted in the MRP, the receiving water monitoring is already being performed by LACSD under the SJCWRP's NPDES Permit Order No. 2015-0070 and WNWRP's NPDES Permit Order No. R4-2014-0213-A01. These requirements may change when those permits are renewed in the future. Therefore, to avoid potential confusion, discrepancy, and duplication in monitoring and reporting, WRD recommends that the receiving water monitoring provision be revised, such that the section VIII heading reads, "Receiving Water Monitoring Requirements – <u>Not Applicable</u>", and that all associated languages provided in this section be replaced with the following language, which is similar to that found in the WBMWD's Juanita Millender-McDonald Carson Regional Water Recycling Plant's NPDES permit (Order No. R4-2013-0046; NPDES No. CA0064246) and the WBMWD's Edward C. Little Water Recycling Plant's NPDES permit ((R4-2012-0026; NPDES No. CA0063401): "<u>A receiving water monitoring and reporting program is not prescribed in this Order/Permit because receiving water monitoring for the Discharge Points 001, 001A, and 001B is covered under the SJCWRP's NPDES permit Order No. R4-2015-0070 (NPDES No. CA0053911), Monitoring and Reporting Program CI-5542 and the WNWRP's NPDES Permit Order No. R4-2014-0213-A01, Monitoring and Reporting Program CI-2848.</u>"</p> <p>Similarly, WRD recommends that section IX on "Other Monitoring Requirements" (i.e., watershed monitoring) be revised, such that the section heading reads, "IX. Other Monitoring Requirements – <u>Not Applicable</u>", and that all associated languages provided in this section be replaced with the following language: "<u>A. Watershed Monitoring (Not Applicable). Watershed monitoring and reporting program is not prescribed in this Order/Permit because Watershed-wide Monitoring Program for the San Gabriel River, which was approved by the Regional Water Board on September 25, 2006, which includes an instream bioassessment monitoring for the reaches to be affected by the GRIP-AWTF's discharge, is already being conducted by LACSD as required under the San Jose Creek WRP NPDES Order No.R4-2015-0070. (NPDES No. CA0053911), Monitoring and Reporting Program CI-5542, and the WNWRP's NPDES Permit Order No. R4-2014-0213-A01, Monitoring and Reporting Program CI-2848.</u>" Modifications consistent with this comment are reflected in Attachment A. Should the receiving water monitoring requirements be retained notwithstanding WRD's request above, WRD ask that the due dates for the receiving water monitoring data be extended for an additional 30 days beyond the dates specified in Table E-8, to allow sufficient time for WRD to receive the required data from the LACSD, which could be easily accomplished by adding a clarifying footnote to Table E-8. The suggested footnote language is reflected in Attachment A.</p>

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24	X.D.5	E-29	<p>This provision states that, "The Regional Water Board requires the Permittee to file with the Regional Water Board, within 90 days after the effective date of this Order, a technical report on his preventive (failsafe) and contingency (cleanup) plans for controlling accidental discharges, and for minimizing the effect of such events." Based on the comments provided under sections VI.C.6.a and VI.C.6.b, which are incorporated herein by reference, the discharge of tertiary treated water should not trigger the need for cleanup plans for controlling accidental discharges and for minimizing the effect of such events because it is the same water that is discharged from the SJCWRP under an existing NPDES permit Order No. R4-2015-0070. Therefore, WRD recommends the deletion of this provision. Please note that a contingency plan for GRIP-AWTF will be prepared under the future Waste Discharge Requirements/Water Recycling Requirements to be issued for GRIP-AWTF's injection and spreading operations. The purpose of the contingency plan will be to address any discharge of recycled water that does not meet the State requirements associated with groundwater discharge and replenishment activities. Modifications consistent with this comment are reflected in Attachment A.</p>
<b>Attachment F</b>			
25	III.C.6.	F-10	<p>Based on WRD's objection to the inclusion of specified TBELs, this section of the Fact Sheet must be revised. Further, the statement that "[c]ollectively, this Order's restrictions on individual pollutants are no more stringent than required to implement the requirements of the CWA." is not accurate. Most of the TBELs are based on state law provisions in Title 22 of the California Code of Regulations/Division of Drinking Water that are separate and apart from any requirements imposed under federal law (and the tentative Order recognizes this when referencing that the TBELs imposed are more stringent than the secondary-treatment based requirements applicable to POTWs). For this reason, WRD requests this phrase be removed. Modifications consistent with this comment are reflected in Attachment A.</p>
26	IV.B.1	F-14, F-15	<p>WRD objects to inclusion of the POTW-related findings regarding technology-based requirements, and the following language and its conclusion: "The San Jose Creek WRP, a POTW, supplies the tertiary treated effluent water to the GRIP-AWTF. The GRIP-AWTF further treats this influent water using an advanced treatment system (i.e., ultrafiltration and reverse osmosis). Since the GRIP-AWTF is connected to the overall POTW treatment system and the origin of waste that will be treated by GRIP-AWTF comes from a POTW, the technology-based regulation is applicable to the GRIP-AWTF." Contrary to Regional Water Board staff's statements, the GRIP-AWTF is not a part of the Los Angeles County Sanitation District's POTW system, and technology-based requirements related to secondary (Clean Water Act) and/or tertiary (Title 22, otherwise) treatment applicable to the POTW in this case (Los Angeles County Sanitation Districts via the San Jose Creek WRP), are not automatically applicable to the GRIP-AWTF project simply because it seeks to access the finished tertiary treated recycled water so as to treat it further for enhanced beneficial use (groundwater recharge and/or indirect potable reuse). WRD's proposed activity does not legally transform WRD into a POTW, as that term is defined in federal law at 40 C.F.R. §§122.2 and 403.3, because the water WRD is accessing is no longer "municipal sewage or industrial waste." Technology-based requirements applicable to POTWs do not spring into applicability simply because WRD further handles water that has already been subject to such technology-based requirements at the appropriate location</p>

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			<p>(collection system and the NPDES permit applicable to the San Jose Creek WRP). Further, 40 C.F.R. § 122.44(a)(1) requires NPDES permits to include “applicable” technology-based requirements; there are no applicable technology-based requirements (promulgated under Clean Water Act section 301(b)) applicable to the activities undertaken by WRD; those that may have applied earlier in the treatment process have already been satisfied. For this reason, WRD requests that all technology-based requirements related to operation of the POTW be removed. In their place, Regional Water Board staff can indicate in appropriate sections of the tentative Order that the work performed as required by the San Jose Creek WRP NPDES Permit and MRP previously satisfied any such requirements; the tentative Order can continue imposing relevant water quality-based requirements. Modifications consistent with this comment are reflected in Attachment A.</p>
27	IV.B.2	F-15	<p>The tentative Order states, “This Facility is also subject to TBELs contained in similar NPDES permits, for similar facilities, based on the treatment level achievable by tertiary-treated wastewater treatment systems. These effluent limitations are consistent with the State Water Board precedential decision, State Water Board Order No. WQ 2004-0010 (City of Woodland).” WRD objects to this provision because POTWs and the GRIP AWTF are not similar facilities, they have different purposes, and their permits should reflect such differences. As noted above, TBELs applicable to the POTW (San Jose Creek WRP) are not appropriate to apply to WRD’s activities, and the WRD has requested that they be removed along with findings that support their imposition. Further, this section misapplies the State Water Board’s precedential decision in the City of Woodland matter, which affirmed the imposition of tertiary-treatment requirements to address virus and pathogen removal; the State Water Board’s decision does not support the imposition of technology based-requirements on WRD, after the water has already been subject to such treatment at the San Jose Creek WRP.</p>
28	IV.C.2.	F-16, F-17	<p>As noted above, WRD objects to the inclusion of specified TBELs, and requests that they be removed from the tentative Order, along with the associated discussions in the Fact Sheet cited in comment #4. Modifications consistent with this comment are reflected in Attachment A.</p>
29	IV.C.2.b.vii	F-18, F-19	<p>WRD objects to the rationale/description used to establish the MBAS limit, as provided in the first paragraph of section IV.C.2 (shown below) and recommends the deletion of the rationale provided: “...Given the fact that the source water of the GRIP-AWTF is from San Jose Creek WRP) which accepts domestic wastewater into the sewer system and treatment plant, and the characteristics of the treated wastewater discharged, the discharge has reasonable potential to exceed both the numeric MBAS WQO and the narrative WQO for the prohibition of floating material such as foams and scums. This treated wastewater from the San Jose Creek WRP will become the influent water to the GRIP-AWTF. Therefore an effluent limitation for MBAS is required.”</p> <p>In particular, the statement “the discharge has reasonable potential to exceed both the numeric MBAS WQO and the narrative WQO” is problematic for several reasons. First, the rationale provided does not appear to take into consideration the long history of compliance of the GRIP-AWTF’s source water, <i>i.e.</i>, SJCWRP’s tertiary treated recycled water, with the MBAS limit. For instance, based on WRD’s review of the last six years (2011 to 2016) of MBAS data associated</p>

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			<p>with the San Jose Creek WRP's tertiary treated recycled water, MBAS was consistently not detected (i.e., below the method detection limit of 0.1 mg/L) in the SJCWRP East and West plants' tertiary treated recycled water, with the exception of 11/5/2014 samples, which were measured at 0.15 mg/L (SJCWRP East) and 0.11 mg/L (SJCWRP West), both below the SJCWRP's NPDES permit limit of 0.5 mg/L. The Regional Water Board failed to provide its quantitative rationale in the tentative Order for determining "reasonable potential" for this constituent as required, and WRD's own analysis of influent data does not support such a finding. Also, WRD's review of the reasonable potential analysis worksheet (file name – "GRIP RPA Discharge Point 001 and RSW-007 (4-13-2017).xism"), provided on 8/1/2017 by the Regional Water Board staff at WRD's request, did not indicate a reasonable potential for MBAS. Second, GRIP-AWTF is an advanced water treatment facility, and its advanced treated recycled water will be very similar to that produced by WRD's Leo J. Vander Lans Water Treatment Facility (LVLWTF), an advanced water treatment facility with a treatment train very similar to that proposed for the GRIP AWTF. Based on the data for the most recent five years, the LVLWTF has produced an advanced treated recycled water that is consistently below the reporting level of 0.05 mg/L. The rationale provided in section IV.C.2 does not appear to take into consideration the fact that the advanced water treatment to be provided at GRIP-AWTF has shown to be capable of producing an advanced treated recycled water with MBAS concentrations consistently below the reporting level and therefore, does not pose a reasonable potential. For these reasons, WRD recommends the removal from the tentative Order the MBAS limit, associated rationale provided in section IV.C.2, MBAS effluent and receiving water monitoring. Modifications consistent with this comment are reflected in Attachment A.</p>
30	IV.C.2.b.	F-18 to F-27	<p>Based on WRD's review of the reasonable potential analysis worksheet (file name – "GRIP RPA Discharge Point 001 and RSW-007 (4-13-2017).xism"), provided on 8/1/2017 by the Regional Water Board staff at WRD's request, indicated that there was no reasonable potential for ammonia, nitrate, nitrite, sulfate, and total phosphorus. The reasonable potential analysis for these constituents was performed using SJCWRP's discharge data and water quality criteria either lower than or the same as the numerical effluent limits imposed by this tentative Order (Note: No limit was assigned for total phosphorus). Therefore, since there was no reasonable potential demonstrated, WRD recommends the removal from the tentative Order the effluent limits for ammonia, nitrite, nitrite + nitrate, and sulfate, the associated rationale provided in section IV.C.2, associated receiving water monitoring and sulfate effluent monitoring. WRD agrees to perform effluent monitoring for ammonia, nitrite and nitrate. In addition, phosphorus has no associated water quality criteria. Therefore, WRD requests that total phosphorus be removed from influent, effluent, and receiving water monitoring. Modifications consistent with these comments are reflected in Attachment A.</p>
31	IV.C.3	F-30	<p>The fourth paragraph of section IV.C.3 contains the following statement: "Since the combined effluent from the San Jose Creek WRP (East and West) will be the same quality of water that is delivered to the GRIP-AWTF as influent water, during this permit cycle only, this permit will assume for the purposes of determining RPA, and based on best professional judgment, the data established for Discharge Points 001, 001A and 001B for the San Jose Creek WRP will be the same for the GRIP-AWTF." While it is true that the GRIP-AWTF is a new facility, and</p>

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			therefore, no effluent data is available, WRD does not believe that the SJCWRP's discharge data are reasonably representative of the GRIP-AWTF's future discharge water quality. In fact, using the SJCWRP's discharge data for the purpose of determining reasonable potential for the GRIP-AWTF is essentially assuming the worst-case scenario, where no treatment is provided by the GRIP-AWTF. GRIP-AWTF is an advanced water treatment facility, and its advanced treated recycled water will be very similar to that produced by WRD's Leo J. Vander Lans Water Treatment Facility (LVLWTF), an advanced water treatment facility with a treatment train very similar to that proposed for the GRIP AWTF. No changes are proposed.
<b>Attachment G</b>			
32	Attachment G	G-1 to G-3	WRD would like to highlight that fact that most of the requirements contained in Attachment G are written specifically for POTWs, and as such, do not pertain to an advanced water treatment facility, such as GRIP AWTF. For instance, sections A.2.c (biodegradation kinetics calculations/assumptions), A.4 (primary sedimentation, activated sludge, and secondary clarification), A.6 (sludge processing, tertiary filter backwash, cooling water), A.7 (combined sewer overflow bypass data), A.8.a (use of polymer), A.8.c (use of alum), all of C (sewage residuals), and all of D (industrial waste survey) are not applicable to GRIP-AWTF. WRD requests that the provisions not relevant to the GRIP-AWTF be removed from Attachment G. Modifications consistent with this comment are reflected in Attachment A.
<b>Minor Edits for Clarification, Typographical/Factual Errors, and Inconsistencies</b>			
33	I	4	Under Facility Information, please incorporate the following editorial correction: "Groundwater Reliability Improvement <del>Program</del> <u>Project</u> – Advanced Water Treatment Facility..." Modifications consistent with this comment are reflected in Attachment A.
34	III.D.	5	Please revise "State Water Board Resolution No. 68-16" to " <u>State Water Resources Control Board (State Water Board)</u> Resolution No. 68-16", since the abbreviation is used for the first time in the tentative Order. Modifications consistent with this comment are reflected in Attachment A.
35	IV.A.1.a Table 4, footnote 6	7	As stated in the Fact Sheet, there is no discharge data for GRIP-AWTF because it is a new discharger. As such, the Regional Water Board performed reasonable potential analyses based on the water quality data associated with the San Jose Creek WRP's tertiary treated recycled water, which is the influent to the GRIP-AWTF. Therefore, please revise the statement in footnote 6 of Table 4 to reflect that any reasonable potential is based on the source water to be used by GRIP-AWTF, as follows: " <u>A numeric narrative</u> <del>WQBEL</del> <u>is established because effluent influent data, which were used in the absence of discharge data, showed that there is reasonable potential for the effluent influent to cause or contribute to an exceedance of the chronic toxicity water quality objective. Once sufficient discharge data from the GRIP-AWTF is generated, this reasonable potential analysis can be revisited and the permit modified accordingly.</u> " While WRD is willing to accept use of the influent source water to conduct the reasonable potential analysis, WRD would like to note that federal regulations pertaining to "new dischargers," authorize the use of estimated pollutant values based on expected performance for purposes of the reasonable potential analysis and permit issuance, and provide for two (2) years of data collection post-NPDES permit issuance to refine and establish any necessary effluent limitations. See 40 C.F.R. §122.21(k). The suggested edit from "numeric" to "narrative" is based on the

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			rationales provided in Attachment C. Modifications consistent with this comment are reflected in Attachment A.
36	V.B	11	For consistency, please incorporate the following editorial correction: "State Water Board Resolution No. 68-16". Modifications consistent with this comment are reflected in Attachment A.
37	VII.P	24	Since CIWQS only contains units of pCi/L, not millirem/year, WRD recommends that the first two sentences of section VII.P be modified as follows: "The monthly average effluent limitation for gross beta/photon is equal to 4 millirem/year. If the results of testing for all beta and photon emitters is less than or equal to 50 picoCuries per liter (pCi/L), the facility is in compliance and the value shall be reported as <del>4 millirem/year</del> <del><50 pCi/L.</del>" Modifications consistent with this comment are reflected in Attachment A.
38	VII.R.2	27	The sentence under this section, which currently reads, "For bacterial analyses, sample dilutions should be performed so the expected range of values is bracketed (for example, with multiple tube fermentation method or membrane filtration method, 2 to 16,000 per 100 ml for total and fecal coliform, at a minimum, and 1 to 1000 per 100 ml for enterococcus)." Please modify the above sentence by adding the acceptable dilution for E. coli, which is required to be monitored, and removing the information on enterococcus, which is not required to be monitored.
39	VII.R.4	27	The sentence under this section should be revised to read, "Detection methods used for <del>enterococcus</del> <i>E.Coli</i> shall be those presented in Table 1A of 40 CFR part 136..." since the tentative Order requires monitoring of <i>E. Coli</i> , not enterococcus. Modifications consistent with this comment are reflected in Attachment A.
<b>Attachment C</b>			
40	Attachment C	C-1	In Attachment C, please revise the description below the diagram to "Attachment C- <u>Advanced Treated Recycled Water Wastewater</u> Flow Schematic...". Modifications consistent with this comment are reflected in Attachment A.
<b>Attachment D</b>			
41	V.C.2	D-6	Please correct the typographical error in the first sentence as shown: "...Regional Water Board <del>Name</del> or State Water Board..." Modifications consistent with this comment are reflected in Attachment A.
<b>Attachment E</b>			
42	Table of contents	E-1	For consistency with the remainder of the table of contents, WRD recommends the following edit: "VII. Recycling Monitoring Requirements ( <del>NOT APPLICABLE</del> Not Applicable)". Modifications consistent with this comment are reflected in Attachment A.
43	Attachments E and F, Various sections	Various	According to Attachment F, II.A.1, "SJCWRP" is the acronym for the San Jose Creek Water Reclamation Plants. However, Attachments E and F of this Order use both "SJCWRP" and "San Jose Creek WRP" to refer to the San Jose Creek Water Reclamation Plants. For clarity, please streamline the use of the acronyms by redefining or removing one of the acronyms.
44	I.H	E-3	The provision states, "The monitoring report shall specify the USEPA analytical method used, the Method Detection Limit (MDL), and the Reporting Level (RL) [the applicable minimum level (ML) or reported Minimum Level (RML)] for each pollutant..." ML, MDL, and RL are defined in Attachment A. However, the tentative Order does not define the terms "reported Minimum Level (RML)". WRD requests that a definition for RML be provided in Attachment A.

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45	I.I	E-3	Please incorporate the following editorial correction to this provision: “unless the Permittee ... obtains approval for a higher ML from the Executive Officer, as provided for in section JK, below.” Section K (and not section J) states that the Regional Water Board Executive Officer, in consultation with the State Water Board’s Quality Assurance Program Manager, may establish an ML that is not contained in Appendix 4 of the SIP to be included in the Permittee’s permit. Modifications consistent with this comment are reflected in Attachment A.
46	II. Table E-1	E-4	Should the influent flow-weighted concentration reporting requirement be retained notwithstanding WRD’s request for its deletion (comment #20), WRD recommends that the following editorial correction be incorporated into the second sentence under the Monitoring Location Description associated with INF-001 in Table E-1: “The calculated flow-weighted concentrations of the effluent reported for EFF-001, EFF001A, and EFF-001B <u>from the San Jose Creek WRP Order No. R4-2015-0070 (NPDES Permit No. CA0053911)</u> is the influent concentration that will be reported for the GRIP-AWTF.”
47	II. Table E-1	E-5	Should the receiving water monitoring requirements be retained notwithstanding WRD’s request for their deletion (comment #23), WRD has the following additional comments. The first paragraph in Section VIII of Attachment E states that, “GRIP-AWTF’s receiving water monitoring station RSW-001 is also the same receiving water monitoring station for the Whittier Narrows WRP’s RSW-002 (RA).” For clarity and consistency with the rest of Table E-1, please revise the description of RSW-001 in Table E-1 to read, “San Gabriel River, 100 feet downstream of the Whittier Narrows WRP Discharge Point 001 (R-A). This existing station (aka RSW-002 (RA) of Whittier Narrows WRP) will serve as the upstream monitoring station for the GRIP-AWTF.”
48	II. Table E-1	E-5	<p>Per the comment provided under Attachment E, section VIII (comment #23), WRD recommends the removal of the receiving water monitoring stations and TMDL stream flow monitoring stations from Table E-1 Should the receiving water monitoring requirements be retained notwithstanding WRD’s request, WRD has the following additional comments. According to Table E-1, receiving water station RSW-001 is equivalent to WNWRP’s receiving water station RSW-002 (RA), and RSW-002, RSW-003, and RSW-004 are equivalent to the SJCWRP’s receiving water stations RSW-006 (R12), RSW-007 (R13), and RSW-005 (R2), respectively. The latitude and longitude provided in Table E-1 for the four receiving water monitoring stations do not match the latitude and longitude for these same stations as verified by LACSD and as stated in the SJCWRP Order No. R4-2015-0070, as further discussed below:</p> <p><u>WNWRP’s RSW-002 (RA)</u> - Latitude: 34.0223611° Longitude: -118.054833° (verified by LACSD via email)  However, the latitude/longitude for RSW-002 in this tentative Order is shown as: Latitude: 33.02453° Longitude: -118.05322°.</p> <p><u>SJCWRP’s RSW-006</u> - Latitude 33.993862 N and Longitude -118.073457 W.  However, the latitude/longitude for RSW-002 in this tentative Order is shown as: Latitude: 33.96972° Longitude: -118.088612°.</p> <p><u>SJCWRP’s RSW-007</u> - Latitude 33.969472 N and Longitude -118.088778 W.  However, the latitude/longitude for RSW-003 in this tentative Order is shown as: Latitude:</p>

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			33.96972° Longitude: -118.08861°. SJCWRP's RSW-005 - Latitude 33.9295278 N and Longitude -118.1078056 W. However, the latitude/longitude for RSW-003 in this tentative Order is shown as: Latitude: 33.93056° Longitude: -118.10778° WRD recognizes that the latitude/longitude information associated with the receiving water stations in the tentative Order may have been based on the approximate data provided by the District. WRD requests that the receiving water station latitude/longitude in Table E-1 be updated to make them consistent with the WNWRP's RSW-002 and SJCWRP's RSW-006, 007, and 005.
49	II. Figure E-1	E-6	WRD recommends that the title of Figure E-1 be modified as follows: "GRIP-AWTF <u>Outfalls and Receiving Water Stations</u> ", and any references to Figure E-1 be updated appropriately. Modifications consistent with this comment are reflected in Attachment A.
50	II. Figures E-2 and E-3	E-7, E-8	Since the tentative Order regulates surface discharge only, the groundwater recharge reference on Figures E-2 and E-3 should be removed. The text at the bottom of these figures should be revised to read, "When open, discharges to the unlined San Gabriel River"
51	IV. Table E-3, footnote 4	E-11	Should the effluent turbidity limit be retained notwithstanding WRD's comment #4 regarding the inapplicability of TBELs and request for removal of the effluent turbidity limit, WRD has the following additional comments. For turbidity monitoring, the continuous sampling is for compliance with the 72 minutes above 5 NTU limit, the flow proportioned average daily value is for compliance with the 2 NTU limit, and the grab sample is for compliance with the 10 NTU limit. The SJCWRP's NPDES permit allows grab samples to be used as an option. Therefore, WRD recommends footnote 4 to be revised as follows: "...Grab sample <del>may shall</del> be collected at <del>monitoring location EFF-001. It shall be used to determine compliance with the 10 5 NTU limit...</del> "
52	IV.B.1 Table E-3, Footnote 7	E-12	Please incorporate the following editorial correction to the last sentence in Footnote 7 to Table E-3: "Furthermore, additional monitoring requirements specified in section <del>IV.A.4</del> <u>IV.B.2</u> , shall be followed." There is no section IV.A.4. The Total Residual Chlorine Additional Monitoring appears under section IV.B.2. Modifications consistent with this comment are reflected in Attachment A.
53	IV.B.1 Table E-3	E-13, E-14	The effluent monitoring frequency of many constituents is more stringent than that found in the 2015 SJCWRP NPDES permit Order No. R4-2015-0070. Since the GRIP AWTF advanced treated recycled water will have water quality that is far superior to the SJCWRP's tertiary treated recycled water, WRD requests modifications to at least match the effluent monitoring frequency to that in Order No. R4-2015-0070, as shown in Attachment A. Further, the word "waste" should be removed from the phrase "total waste flow" for the reasons set forth above. Modifications consistent with this comment are reflected in Attachment A.
54	IV.B.1 Table E-3, Footnote 8	E-12	Per the effluent monitoring frequency modification requested in comment #53, please revise the references to "daily" in footnote 8 to "weekly". Modifications consistent with this comment are reflected in Attachment A.
55	V.A.3	E-16	Please define or spell out "ppt" referenced in the first sentence of Attachment E, section V.A.3.
56	V.A.4	E-16	The effective date of the tentative Order is November 1, 2017. The facility will not be in operation when the Order takes effect. Therefore, for clarity, please revise the first sentence of Attachment

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			E, V.A.4., to read, "Species sensitivity screening shall be conducted beginning the first month the permit is in effect or the facility's first month of operation." Modifications consistent with this comment are reflected in Attachment A.
57	V.A.6	E-18	WRD requests that the fourth sentence in Attachment E, section V.A.6, be revised to read, "At a minimum, the TRE Work Plan must contain the provisions in Attachment G <u>that are relevant to the GRIP-AWTF.</u> " WRD would like to highlight that fact that most of the requirements contained in Attachment G are written specifically for POTWs, and as such, do not pertain to an advanced water treatment facility, such as GRIP AWTF. For instance, sections A.2.c (biodegradation kinetics calculations/assumptions), A.4 (primary sedimentation, activated sludge, and secondary clarification), A.6 (sludge processing, tertiary filter backwash, cooling water), A.7 (combined sewer overflow bypass data), A.8.a (use of polymer), A.8.c (use of alum), all of C (sewage residuals), and all of D (industrial waste survey) are not applicable to GRIP-AWTF. As further detailed in the comments provided under Attachment G, WRD requests the removal of POTW-related provisions in Attachment G.
58	V.A.6	E-18	WRD recommends that the third sentence in Attachment E, section V.A.6, be modified as follows: "The Permittee shall use USEPA manual EPA/833B-99/002 (municipal) as guidance, or most current version or EPA manual <i>Generalized Methodology for Conducting Industrial Toxicity Reduction Evaluations</i> (EPA/600/2-88/070, April 1989)". The recommended language is consistent with that found in the WBMWD's Edward C. Little Water Recycling Plant's NPDES permit (R4-2012-0026; NPDES No. CA0063401) and will provide the GRIP-AWTF, which is not a municipal wastewater treatment plant, greater options and flexibility when preparing the initial investigation toxicity reduction evaluation (TRE) work plan. (According to section V.A.8.a, EPA/833B-99/002 (municipal) refers to USEPA manual <i>Toxicity Reduction Evaluation Guidance for Municipal Wastewater Treatment Plants.</i> ) Modifications consistent with this comment are reflected in Attachment A.
59	V.A.8.a	E-19	For the same reason as that stated in comment #58, WRD recommends that the first sentence in section V.A.8.a, be revised as follows: "The Permittee shall immediately initiate a TRE using, according to the type of treatment facility, USEPA manual <i>Toxicity Reduction Evaluation Guidance for Municipal Wastewater Treatment Plants</i> (EPA/833/B-99/002, 1999) or EPA manual <i>Generalized Methodology for Conducting Industrial Toxicity Reduction Evaluations</i> (EPA/600/2-88/070, April 1989)". Modifications consistent with this comment are reflected in Attachment A.
60	V.A.9.a	E-20	Should the chronic toxicity testing requirements be retained, as is, notwithstanding WRD's request for revision per Attachment C, WRD has the following additional comment. The second sentence in section V.A.9.a states, "All toxicity test results ...shall be reported on the SMR due date specified in Table E-7." The SMR due dates are contained in Table E-8, not Table E-7. Please revise accordingly. Modifications consistent with this comment are reflected in Attachment A.
61	VIII	E-21	Should the receiving water monitoring requirements be retained notwithstanding WRD's comment #23, WRD requests that the following clarifying edits be provided to the first paragraph under section VIII: "Monitoring requirements listed below may duplicate existing requirements under Waste Discharge Requirements <u>Order No. R4-2015-0070</u> (NPDES Permit No. CA0053911) for the San Jose Creek WRPs--and <u>Order No. R4-2014-0213-A01</u> (NPDES Permit

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			<p>No. CA0053716) for the Whittier Narrows WRP. The San Jose Creek WRPs receiving water monitoring stations (RSW-005(R2), RSW-006 (R12), and RSW-007 (R13)) for Discharge Points 001, 001A, and 001B are identical to the receiving water monitoring stations (RSW-004, RSW-002, and RSW-003) in this for the GRIP-AWTF permit. GRIP-AWTF's receiving water monitoring station RSW-001 is also the same receiving water monitoring station for the Whittier Narrows WRP's RSW-002 (RA). To avoid duplication, of receiving water sampling and monitoring activities are not required if the monitoring activities performed under San Jose Creek WRP's Order No. R4-2015-0070 and Whittier Narrows WRP's Order No. Order R4-2014-0213-A01 satisfies the requirements of this Order. The Permittee is required to complete shall ensure that the required receiving water monitoring required requirements in by this permit Order is completed. In addition to submitting the results under another order, the The results of all required receiving water monitoring, whether conducted by the Permittee or another agency, shall be submitted in the reports required by this Order. However, monitoring does not need to be conducted at RSW-001, RSW-002, RSW-003, and RSW-004 if there is no discharge through Discharge Point Nos. 001A, 001B, and 001."</p>
62	VIII, Table E-5	E-21	<p>Should the receiving water monitoring requirements be retained notwithstanding WRD's comment #23, WRD has the following additional comments. Currently, Table E-5 on receiving water monitoring requirements specifies the same monitoring frequency for RSW-001, RSW-002, RSW-003, and RSW-004. However, the receiving water monitoring frequency specified in the WNWRP's Order No. R4-2014-0213-A01 is not identical to those specified in the SJCWRP's Order No. R4-2015-0070. WRD requests that separate receiving water monitoring requirement tables be provided for RSW-001 to reflect the monitoring frequency consistent with the WNWRP's Order No. R4-2014-0213-A01 and for RSW-002, RSW-003, and RSW-004 to reflect the monitoring frequency consistent with the SJCWRP's Order No. R4-2015-0070.</p>
63	VIII.A. Table E-5, Footnotes 20 & 21	E-22	<p>Should the receiving water monitoring requirements be retained notwithstanding WRD's request for their deletion (comment #23), WRD has the following additional comments. Table E-5 includes references to "PCBs as aroclors<sup>20</sup>" and "PCBs as congeners<sup>21</sup>". However, footnote 20 is missing and should be provided. Footnote 21 pertains to the use of analytical methods described in 40 CFR 136 and is not related to PCBs as congeners. Please review footnote 21 and provide necessary revisions.</p>
64	VIII.B.1	E-24	<p>Should the receiving water monitoring requirements be retained notwithstanding WRD's request for their deletion (comment #23), for clarity and to avoid duplication in monitoring activities, please modify the first sentence under section VIII.B.1, as follows: "To ensure ..., the Discharger shall monitor the ensure that ammonia concentrations are monitored at RSW-002, RSW-003, and RSW-004..." This section on ammonia receiving water monitoring requirements applies to RSW-002, RSW-003, and RSW-004. To reflect the fact that there are multiple receiving water monitoring stations, please modify the second sentence to "The purpose of the monitoring locations are is to ensure...", and the third sentence to "Concurrent sampling ... will be required at these monitoring locations."</p>
65	VIII.B.2	E-24	<p>Should the receiving water monitoring requirements be retained notwithstanding WRD's request for their deletion (comment #23), for clarity and to avoid duplication in monitoring activities, please modify the language in this section as follows: "The Discharger shall monitor-ensure that</p>

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			San Gabriel River at RSW-002, RSW-003, and RSW-004 is monitored, depending on ....”
66	VIII.C	E-25	Should the receiving water monitoring requirements be retained notwithstanding WRD’s request for their deletion (comment #23), for consistency with the SJCRWP’s NPDES Permit Order R4-2015-0070, please change the reference to TMDL Stream Flow Monitoring Station from “RSW-003D” to “RSW-004D”.
67	X.B.4.b	E-27	WRD requests that the language provided in this provision be modified, as shown below, to also allow the reporting of the detected but not quantified results by J-flagging, which is used by WRD’s commercial laboratory: “Sample results less than the RL, but greater than or equal to the laboratory’s MDL, shall be reported as “Detected, but Not Quantified,” or “DNQ” or “J”.” Modifications consistent with this comment are reflected in Attachment A.
68	X.B.5	E-27	WRD requests that the language under this provision be modified to read, “Compliance with effluent limitations for priority pollutants shall be determined using sample reporting protocols defined above and Attachment A section VII of this Order.” Please note that Attachment A is a list of definitions. Section VII of the tentative Order addresses compliance determination. Modifications consistent with this comment are reflected in Attachment A.
69	X.D.4	E-29	GRIP-AWTF will not be operational for months after the Order takes effect. Therefore, WRD requests that the monitoring and reporting requirements be deferred until when the GRIP-AWTF starts its operation. In light of this request, WRD asks that the language in this provision be modified to read, “The Permittee shall submit to the Regional Water Board, together with the first monitoring report required by this permit <u>after the facility becomes operational</u> , a list of all chemicals and proprietary additives which could affect this waste discharge, including quantities of each....” As it gets much closer to the facility operation date, WRD will have more accurate estimates of the required chemicals and additives and their volume. Modifications consistent with this comment are reflected in Attachment A.
<b>Attachment F</b>			
70	Table of Contents	F-1	In the Table of Contents, please insert the phrase “Not Applicable” next to “Interim Effluent Limitations” and “Recycling Specifications”. Modifications consistent with this comment are reflected in Attachment A.
71	I.D	F-4	Some of the dates included in this section are inconsistent with WRD’s records. Therefore, WRD recommends the following updated language (The submittal and receipt dates are based on email transmittal dates.): “The Discharger filed a report of waste discharge and submitted an application for a waste discharge requirements (WDRs) and NPDES permit on January 4 <del>0</del> <u>11</u> , 2017. Supplemental information was requested on February 4 <del>0</del> <u>2</u> , 2017, and received on February 24 <del>17</del> , 2017. The application was deemed complete on March 13, 2017. A site visit was conducted on May 22, 2017, to observe operations and collect additional data to develop permit limitations and requirements for waste discharge.” Modifications consistent with this comment are reflected in Attachment A.
72	I, Table F-1	F-3	In the third row of Table F-1, please correct the project name as follows: “Groundwater Reliability Improvement Project – Advanced Water Treatment Facility (GRIP-AWTF), <del>Pico Rivera</del> ”.
			Modifications consistent with this comment are reflected in Attachment A.

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73	I.A	F-3	The GRIP-AWTF will not be in operation when the permit is issued. Therefore, WRD requests that the second sentence of this section be modified as follows: " <del>At the time of permit issuance</del> <u>During the initial phase following the Facility startup, the Facility is</u> will be operated by JF Shea Construction." Modifications consistent with this comment are reflected in Attachment A.
74	II.A.2	F-4	For clarity, please revise the first sentence as follows: "The GRIP-AWTF will receive <u>tertiary treated recycled water flow</u> from SJCWRP through a 66-inch pipeline that is located just east of the GRIP-AWTF site. Modifications consistent with this comment are reflected in Attachment A.
75	II.A.3	F-4, F-5	The treatment description should be edited to include chlorination and dechlorination. Chlorination will be provided to prevent biofouling of the supplemental recharge wells. Dechlorination will ensure that flows intended for discharge to the San Gabriel River will be able to meet the total residual chlorine limit in this tentative Order. Modifications consistent with this comment are reflected in Attachment A.
76	II.A.1	F-4 and various	To be more accurate, WRD recommends that the third sentence of this section be revised as follows: "The GRIP-AWTF receives <u>tertiary treated recycled wastewater, which is also Title 22 recycled water, <del>of from</del></u> the San Jose Creek Water Reclamation Plants (SJCWRP), East and/or West facilities, <u>owned and operated by the County Sanitation Districts of Los Angeles County (LACSD). Depending on the availability of the recycled water and operational conditions, the influent to the GRIP-AWTF may consist entirely of the SJCWRP East <del>effluent</del> tertiary treated recycled water, SJCWRP West <del>effluent</del> tertiary treated recycled water, or the combined <del>effluent</del> recycled water from the SJCWRP East and West.</u> " Also, where appropriate, references to the SJCWRP East and West should be changed to SJCWRP East and/or West. In addition, references to "combined tertiary treated effluent" appears in various places in the Order, MRP, and Fact Sheet. WRD recommends that the word "combined" be removed, with the exception of the above edits, for reasons described above. Modifications consistent with these comments are reflected in Attachment A.
77	II.A.5	F-5	Once the tertiary treated recycled water reaches GRIP-AWTF, it should no longer be referred to as effluent to avoid potential confusion. WRD recommends that the second sentence be modified as follows: "The UF feed pumps transfer the tertiary <del>effluent</del> treated recycled water to the treatment train consisting of UF, RO, <del>and</del> UVAOP, <u>chlorination and dechlorination.</u> " Modifications consistent with this comment are reflected in Attachment A.
78	II.A.5	F-5	To be more factually accurate, WRD recommends that the language under this provision be revised as follows: "During normal operation, the main line slide gate to the Montebello Forebay Spreading Grounds is closed and all of the flow is diverted to the influent equalization basin. The UF feed pumps transfer the tertiary <u>treated recycled water <del>effluent</del></u> to the treatment train consisting of UF, RO, <del>and</del> UVAOP, <u>chlorination and dechlorination. Secondary UF filtrate, which is the water recovered from the UF backwash water for the purpose of achieving a higher plant recovery rate, is returned to the equalization tank.</u> The fully advanced treated water, <u>which has undergone UF, RO, UVAOP and chlorination</u> <del>then</del> flows into the product water storage tank from which some of the fully advanced treated water is pumped to the supplemental recharge wells, which will be covered under a separate permit. The fully advanced treated water that is not pumped to the supplemental recharge wells <u>is dechlorinated and</u> flows by gravity to the diversion structure through the open advanced treated water gate. <u>The equalization tank has been</u>

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			<u>purposely designed to allow a certain volume of its water (i.e., tertiary treated recycled water and secondary UF filtrate) to be conveyed. Any excess flows from the equalization tank go over a weir from the equalization tank to the diversion structure where it is blended with the fully advanced treated water. The blended water will then flow back into the 66-inch pipe to the unlined portions of the San Gabriel River adjacent to and downgradient from the Montebello Forebay Spreading Grounds. The flow schematic diagram of the treatment is located in Attachment C. The flows from the equalization tank to the diversion structure, which is specifically authorized by this Order and will not be considered an overflow, spill, or bypass for purposes of enforcement and implementation of provisions under this Order, will be referred to as tertiary treated recycled water in the remainder of this Order for simplicity and since the volume of the secondary UF filtrate is insignificant compared to the tertiary treated recycled water in the equalization tank.</u> Modifications consistent with this comment are reflected in Attachment A.
79	II.A.7	F-5	WRD recommends that the language under this section be modified as follows: <u>“GRIP-AWTF’s brine wastes and other AWTF-similar waste streams (e.g., ultra-filtration UF backwash) will be discharged via LACSD’s Los Angeles County Sanitation District’s sewer system”</u> . Modifications consistent with this comment are reflected in Attachment A.
80	II.B.1.a, II.B.1.b, II.B.1.c	F-5, F-6	WRD requests that the first sentence of sections II.B.1.a, II.B.1.b, and II.B.1.c, which refers to the GRIP-AWTF discharges, be modified to read: <u>“Discharge to San Gabriel River of the blended tertiary treated recycled water from the San Jose Creek WRPs (East and/or West) and the GRIP-AWTF advanced treated recycled water...”</u> Modifications consistent with this comment are reflected in Attachment A.
81	II.B.1.a	F-5	For consistency, insert a dash between “GRIP” and “AWTF” in the first sentence. Also, the same error is noted in various places in the permit, which should be corrected. Modifications consistent with this comment are reflected in Attachment A.
82	II.B.1.a	F-6	For additional clarity, WRD requests that the following sentence be added to the end of section II.B.1.a: <u>“Typically, the GRIP-AWTF discharge is expected to flow into the San Gabriel River via Discharge Points 001A and/or 001B and fully percolate into the unlined portions of the San Gabriel River prior to reaching the lined portion, where Discharge Point 001 is located. The GRIP-AWTF’s discharge via Discharge Point 001 is expected to be infrequent and small in volume, if any.”</u> Modifications consistent with this comment are reflected in Attachment A.
83	II.B.1	F-6	For accuracy, WRD requests that the sentence following section II.B.1.c be modified as follows: <u>“During dry weather (May 1 – October 31), the primary sources of water flow in San Gabriel River, downstream of the discharge outfalls, are the San Jose Creek WRP effluent, GRIP-AWTF’s advanced treated recycled water, and other NPDES-permitted discharges, including urban runoff conveyed through the municipal separate storm sewer systems (MS4).”</u> Modifications consistent with this comment are reflected in Attachment A.
84	II.B.1	F-6	For clarity, WRD requests that the second to the last paragraph in section II.B.1, be revised as follows: <u>“The San Gabriel River <del>are</del> is unlined near the points of discharge, except at Discharge Point 001. Groundwater recharge occurs, both incidentally and through separate WRRs, in these unlined areas of the San Gabriel River where the underlying sediments are highly transmissive to water and pollutants conducive to percolation and groundwater recharge. The Water</u>

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			<p>Replenishment District of Southern California recharges <u>the aquifers beneath</u> the Rio Hondo and San Gabriel Spreading Grounds, located in the Montebello Forebay, <del>with</del> using the Title 22 recycled water purchased from <del>JOS's LACSD's Whittier Narrows WRP, Pomona WRP, and San Jose Creek WRP,</del> <u>imported water (when available) purchased from the Metropolitan Water District of Southern California, stormwater, and local urban runoff.</u> The recharge activity is regulated under WRRs Order No. 91-100, adopted by the Regional Water Board on September 9, 1991, <del>- This order was</del> <u>and amended on April 2, 2009, by Order No. R4-2009-0048 and on April 10, 2014, by Order No. R4-2009-0048-A-01.</u> WRD recommends revising the phrase "highly transmissive to water and pollutants" to "highly conducive to percolation and groundwater recharge" because the former does not account for the pollutant attenuation that occurs as a result of soil aquifer treatment process as the water travels through the aquifers, while the latter is more factually accurate. Modifications consistent with this comment are reflected in Attachment A.</p>
85	II.C	F-7	<p>For clarity, WRD recommends that the language under this section be revised to read, "The discharged <del>effluent at</del> <u>via</u> Discharge Points 001, 001A, 001B is <del>either a blend of the SJCWRPs' tertiary treated effluent recycled water from the SJCWRPs or a blend of the tertiary treated effluent with</del> <u>and the GRIP-AWTF's fully advanced treated recycled water from the AWTF..</u></p> <p>Since the GRIP-AWTF is a new facility, there is no existing <del>effluent</del> <u>data available to reflect the quality of the advanced treated recycled water...</u>" Modifications consistent with this comment are reflected in Attachment A.</p>
86	III.C, Table F-2	F-8, F-9	<p>In Table F-2, for clarity, please add the river reach number and the WBD (watershed boundary database) No. to the receiving water name as shown below:  <u>Receiving water name for Discharge Points 001A and 001B:</u>  "San Gabriel Rive Reach 2 (Whittier Narrows Dam – Firestone Boulevard (Hydro Unit No. 405.15; WBD No. 180701060606)"  <u>Receiving water name for Discharge Points 001:</u>  "San Gabriel Rive Reach 1 (Firestone Boulevard – Estuary) (Hydro Unit No. 405.15; WBD No. 180701060606)"  <u>Receiving water name for Discharge Points 001:</u>  "San Gabriel River Estuary (Hydro Unit No. 405.15; WBD No. 180701060606)"  Table 2-1 of the Basin Plan, which details the beneficial uses of a particular water body, refers to the WBD No. associated with the water body. Therefore, the addition of the WBD in Table F-2 would be helpful. Modifications consistent with this comment are reflected in Attachment A.</p>
87	III.C, Table F-2	F-9	<p>For consistency with the rest of Table F-2, for Discharge Point 001, San Gabriel River Estuary, under existing uses, please insert footnote 1 after REC-1 as shown below:  <u>"Existing:</u>  IND, navigation (NAV), REC-1<sup>1</sup>..."  Modifications consistent with this comment are reflected in Attachment A.</p>

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88	III.C.6	F-10	Should the TBELs be retained notwithstanding WRD's request for their removal (comment #4), WRD has the following additional comment. As stated in the Fact Sheet, section IV.C.2.b.1, the percent removal for BOD and TSS is not applicable to GRIP-AWTF. Therefore, the second sentence of the first paragraph should be modified to remove the reference to percent removal of BOD and TSS, as follows: "The TBELs consist of restrictions on BOD, TSS, oil and grease, settleable solids, turbidity, and pH, <del>and percent removal of BOD and TSS.</del> "
89	III.C.10	F-11	WRD requests that this section be amended as follows to recognize that the Water Code section 1211 process is not an NPDES permit requirement (but rather, a state law requirement): "...and receive approval for such a change <u>outside of the NPDES permit context.</u> The State Water Board retains the jurisdictional authority to enforce such requirements under CWC Section 1211. <u>This is not an NPDES permit requirement.</u> " Modifications consistent with this comment are reflected in Attachment A.
90	III.C.11	F-11	The first sentence, which states, "In accordance with statewide policies concerning water reclamation..." appears to be missing a footnote associated with "water reclamation" that provides the citations for relevant policies and regulations. For clarity, please insert the following footnote (found in the 2015 SJCWRP NPDES Permit, page F-26) next to "water reclamation": " <u>See, e.g., CWC sections 13000 and 13550-13557, State Water Board Resolution No. 77-1 (Policy with Respect to Water Reclamation in California), and State Water Board Resolution No. 2009-0011 (Recycled Water Policy).</u> " Modifications consistent with this comment are reflected in Attachment A.
91	III.D.	F-11, F-12	This section contains references to the Calwater Watershed number (8-digit), which are not found in the latest version of the electronic copy of the Basin Plan available from the Regional Water Board's website. The current version of the Basin Plan seems to refer to the WBD no. instead. To avoid potential confusion, WRD requests that the Calwater Watershed number be replaced with WBD no. as shown below: <u>"San Gabriel River Reach 1 (Estuary to Firestone Blvd.) Hydrologic unit 405.15, WBD No. 180701060606"</u> <u>"San Gabriel River Reach 2 (Firestone Blvd. to Whittier Narrows Dam) Hydrologic unit 405.15, WBD No. 180701060606"</u> <u>San Gabriel River Estuary Hydrologic unit 405.15, WBD No. 180701060606"</u> Modifications consistent with this comment are reflected in Attachment A.
92	IV (Intro)	F-14	WRD requests that the following phrase be added to the last sentence of the first paragraph under this section, to accurately reflect federal regulations, "...;and 40 C.F.R. section 122.44(d) requires that, <u>where reasonable potential is demonstrated,</u> permits include water quality-based effluent limitations..." Modifications consistent with this comment are reflected in Attachment A.
93	IV	F-14	Since the GRIP-AWTF is a new facility with no prior or existing discharge, please modify the first sentence of the second paragraph, as follows: "The variety of potential pollutants <u>expected to be</u> found in discharges from the Facility <u>may</u> presents a potential for aggregate toxic effects to occur." Modifications consistent with this comment are reflected in Attachment A.
94	IV.A.	F-14	For accuracy, WRD requests that the second and third sentences of this section be modified, as follows: "This <del>o</del> Order authorizes the discharge of tertiary treated <del>wastewater</del> <u>recycled water</u> and <u>advanced treated recycled water</u> from Discharge Points 001, 001A, and 001B. It does not

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			authorize any other types of discharges.” Modifications consistent with this comment are reflected in Attachment A.
95	IV.B.1.	F-15	Please modify the first sentence of the second paragraph as follows: “The San Jose Creek WRP, a POTW, supplies the tertiary treated <del>effluent recycled</del> water to the GRIP-AWTF. The GRIP-AWTF further treats this influent water using an advanced treatment system (i.e., ultrafiltration, <del>and reverse osmosis, ultraviolet advanced oxidation, chlorination and dechlorination</del> ). Modifications consistent with this comment are reflected in Attachment A.
96	IV.C.2.b.i	F-16, F-17	Should the TBELs be retained notwithstanding WRD’s request for their removal (comment #4), to be more accurate, WRD requests that the last sentence of the second paragraph of this section be modified as follows: “ <u>The GRIP-AWTF’s source water, i.e., SJCWRP’s tertiary treated recycled water, has consistently complied with the numerical limits for both BOD<sub>5</sub>20°C and TSS, where applicable, at the POTW. The GRIP-AWTF facility is expected to achieve significant, additional solids removal that are better than secondary-treated wastewater by using through its use of ultrafiltration and reverse osmosis systems.</u> ” Modifications consistent with this comment are reflected in Attachment A.
97	IV.C.2.b.v	F-18	The paragraphs under section IV.C.2.b.v contain repeated references to the chlorine toxicity to aquatic life and a minor grammatical error (incorrectly uses “exposure of chlorine” instead of “exposure to chlorine”). WRD recommends the following editorial modifications to the paragraphs to read: “Disinfection of wastewaters with chlorine produces a chlorine residual. Chlorine and its reaction products are toxic to aquatic life, <u>and short term exposure to chlorine may cause fish kills</u> . The limit for residual chlorine is based on the Basin Plan water quality objective, “Chlorine residual shall not be present in surface water discharges at concentrations that exceed 0.1 mg/L and shall not persist in receiving waters at any concentration that causes impairment of beneficial uses..... <del>Chlorine is very toxic to aquatic life and short term exposure of chlorine may cause fish kills.</del> ” Modifications consistent with this comment are reflected in Attachment A.
98	IV.C.2.b.vi	F-18	Per comment #30 (request for deletion of the effluent limit for sulfate), and for clarity, WRD requests that the second sentence of the first paragraph be modified as follows: “ <del>The TDS = 750 mg/L; Sulfate = 300 mg/L and Boron = 1.0 mg/L.</del> <u>The effluent limitations for TDS and boron are 750 mg/L and 1.0 mg/L, respectively.</u> ” Modifications consistent with this comment are reflected in Attachment A.
99	IV.C.2.b.ix.(a)(1)	F-21	To be more accurate and complete, WRD recommends that the language under this section be edited as follows: “...The San Jose Creek WRP and the GRIP-AWTF shares the same discharge outfalls, namely, Discharge Points 001, 001A and 001B.”
100	IV.C.3	F-29	WRD recommends editing the first sentence of this section as follows: “The Regional Water Board developed WQBELs <u>for</u> copper...” Modifications consistent with this comment are reflected in Attachment A.
101	IV.C.4.b	F-34	For clarity, WRD recommends the following minor edits to the language under this section: “Section 7- (Implementation Recommendations) of the <del>EPA-established metals TMDLs</del> <u>USEPA’s report on Total Maximum Daily Load for Metals and Selenium for San Gabriel River and Impaired Tributaries</u> describes the implementation procedures and regulatory mechanisms that could be used to provide reasonable assurances that water quality standards will be met. For POTWs

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			NPDES permits, USEPA suggest that permit writers could translate waste load allocations (WLAs) into effluent limits by applying the SIP procedures or other applicable engineering practices authorized under federal regulations.” Also it is unclear why the reference to USEPA’s suggestion for POTWs NPDES is included, since an AWTF is not a POTW. Please either delete the reference or explain how it is relevant to the GRIP-AWTF.
102	IV.C.4.b	F-35	The first sentence of the first paragraph under the heading “Discharge Point 001, Reach 1” states, “According to Table 2-9, Summary of dry-weather and wet weather impairments, San Gabriel River Estuary has only a dry-weather impairment for copper.” As written, it is unclear what document is being referenced in the sentence. For clarity, WRD requests that the sentence be modified slightly, as follows: “According to Table 2-9 (Summary of dry-weather and wet weather impairments) of the USEPA’s San Gabriel River Metals TMDLs report, San Gabriel River Estuary has only a dry-weather impairment for copper.” Also, WRD requests that the first sentence in the first paragraph under the heading “Discharge Point 001A and 001B, Reach 1” be revised in a similar manner. Modifications consistent with this comment are reflected in Attachment A.
103	IV.C.4.d	F-37	Please correct the typographical error in the first sentence of this section, as follows: “Federal NPDES regulations contained in 40 CFR part 122.45 <del>continuous Permittees</del> , states that all permit limitations...”. Modifications consistent with this comment are reflected in Attachment A.
104	IV.C.4.e, Table F-8, footnote 6	F-39	Should the chronic toxicity effluent limit be retained, as is, notwithstanding WRD’s request for its revision (Attachment C), WRD has the following additional comments. In light of the fact that the GRIP-AWTF is a proposed facility and that the Regional Water Board used the influent data for all reasonable potential analyses, WRD requests that footnote 6 associated with Table F-8 be modified, as follows: “A numeric WQBEL is established because <u>SJCWRP’s effluent discharge data showed that there is reasonable potential...</u> ”
105	IV.D.1	F-43	The last two sentences in the first paragraph of section IV.D.1 states, “The GRIP-AWTF is a new discharge. However, the effluent limitations in this Order are based on TBELs and WQBELs that are protective of the receiving water beneficial uses.” For clarity, please delete the word “However”, which does not seem to make sense in the context presented. Also, since WRD is requesting the removal of TBELs from the tentative Order (comment #4), please delete the words “ <del>TBELs and</del> ” from the above sentence. Modifications consistent with this comment are reflected in Attachment A.
106	IV.D.2	F-43	For clarity, the second, third, and fourth sentences in the second paragraph of section IV.D.2 should be revised as follows: “The influent to the GRIP-AWTF <del>comes from</del> <u>consists of the San Jose Creek WRPs tertiary treated effluent that is already complying recycled water from the San Jose Creek WRPs, which has consistently complied with its own NPDES permit (CA0053911, Order No. R4-2015-0070).</u> The tertiary treated <del>effluent</del> <u>recycled water</u> is further treated by the GRIP-AWTF. Further treatment at the GRIP-AWTF will produce <u>an advanced treated recycled water of superior much higher water quality than the San Jose Creek WRP and will only further assure the attainment of the water quality standards in the receiving water.</u> ” Modifications consistent with this comment are reflected in Attachment A.
107	IV.D.2	F-44	Please revise the second sentence in the third paragraph, as follows: “The Regional Water Board may modify the terms of this Order to prevent degradation of high quality waters based on

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			any change in the concentration of these constituents in the effluent or receiving water that indicates that a degradation of high quality waters may occur.” Since there are no specific constituents referenced in the preceding paragraphs, the phrase “these constituents” should be changed to “the constituents”. Modifications consistent with this comment are reflected in Attachment A.
108	IV.D.3, Table F-9	F-44 to F-47	Should mass limits be retained notwithstanding WRD’s request in comment #6, to be consistent with the information presented in Table 4, the average weekly BOD <sub>5</sub> 20°C mass-based limit should be 3,703 lb/day, not 3,704 lb/day as shown in Table F-9.
109	IV.D.3, Table F-9, footnote 3	F-44 to F-47	Under the column for units, footnote 3 is shown adjacent to lb/day. However, footnote 3 is not defined. Please add a definition for footnote 3.
110	IV.E	F-47	For consistency, please edit the heading of section IV.E, as follows: “Interim Effluent Limitations – Not Applicable”. Modifications consistent with this comment are reflected in Attachment A.
111	IV.G	F-48	For consistency, please edit the heading of section IV.G, as follows: “Recycling Specifications – Not Applicable”. Modifications consistent with this comment are reflected in Attachment A.
112	V.B	F-48	Since multiple discharge points are associated with the GRIP-AWTF, for clarity, WRD recommends that the second sentence be modified, as follows: “Sections of the San Gabriel River, near the points of discharge, are designated as GWR beneficial use.” Modifications consistent with this comment are reflected in Attachment A.
113	VI.B.2.a	F-49	For clarity, WRD requests that the fifth sentence of this section be modified as follows: “Prior to <u>discharging pursuant to any plant expansion</u> , this provision requires the Permittee to submit the Antidegradation Analysis and Engineering Report for the proposed Plant Expansion to the Regional Water Board for approval.” Modifications consistent with this comment are reflected in Attachment A.
114	VI.B.2.c	F-49	Per the comment provided under section VI.C.2.b of the tentative Order, WRD believes that provision VI.B.2.c of the Fact Sheet is not applicable to the GRIP-AWTF and therefore requests that the phrase “Not Applicable” be added to the section heading and the language following the section heading be removed, as follows: “c. Treatment Plant Capacity (Not Applicable)”.
115	VI.B.5	F-49	For consistency with the rest of the tentative Order, please add the phrase “Not Applicable” next to the heading for section VI.B.5 and remove the statement in VI.B.5.a, as follows: “5. Special Provisions for Publicly-Owned Treatment Works (POTWs) (Not Applicable)”
116	VIII.A.	F-51	WRD request that the reference to sanitary sewer overflow reporting, and requirements for standby or emergency power be deleted from the last sentence of section VIII.A., as they should not apply to the GRIP-AWTF, as previously explained. Modifications consistent with this comment are reflected in Attachment A.
117	VIII.G	F-52, F-53	The GRIP-AWTF is being constructed solely for the purpose of producing high quality recycled water to replenish the Central Basin. Therefore, WRD recommends the following edits to the last sentence of section VIII.G: “ <del>To encourage recycling, the Permittee is required by this Order to continue to explore the feasibility of recycling to maximize the beneficial reuse of tertiary treated effluent. Most of the effluent to be discharged under this Order will be reused for beneficial purposes.</del> The GRIP-AWTF is constructed specifically for the purpose of producing advanced treated recycled water to replenish the Central Basin and to help improve the water quality of the

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			groundwater resources in the area. <u>As such, the GRIP-AWTF clearly and effectively advances the goals of the Recycled Water Policy.</u> Modifications consistent with this comment are reflected in Attachment A.
118	IX.E	F-54	The first sentence states, "The Report of Waste Discharge, other supporting documents, and comments received are on file and may be inspected at the address above...". However, the address of the Regional Water Board is not provided. In fact the only addresses provided "above" are for City of Simi Valley Council Chamber (the proposed location for the public hearing) and the PO Box address for the State Water Board (for reconsideration of WDRs). Therefore, for clarity, WRD request that the sentence be modified appropriately to include the address of the Regional Water Board.