

Heal the Bay

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February 6, 2017

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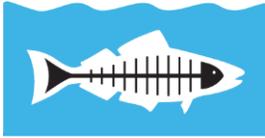
VIA EMAIL

Re: Tentative Waste Discharge Requirements / National Pollutant Discharge Elimination System Permit – City of Burbank, Burbank Water Reclamation Plant (CA0055531, CI-4424); City of Los Angeles, Los Angeles-Glendale Water Reclamation Plant (CA0053953, CI-5675); and City of Los Angeles, Donald C. Tillman Water Reclamation Plant (CA0056227, CI-5695)

Dear Ms. Cuevas, Mr. Medina, Ms. Erickson, and Ms. Morris,

On behalf of Heal the Bay, we submit the following comments on the *Tentative Waste Discharge Requirements / National Pollutant Discharge Elimination System Permit – City of Burbank, Burbank Water Reclamation Plant; City of Los Angeles, Los Angeles-Glendale Water Reclamation Plant; and City of Los Angeles, Donald C. Tillman Water Reclamation Plant* (Tentative WDRs). Heal the Bay is an environmental organization with over 15,000 members dedicated to making the coastal waters and watersheds of greater Los Angeles safe, healthy, and clean. We appreciate the opportunity to provide comments on these Tentative WDRs.

It has been promising, especially considering the region's multi-year drought, to see the Los Angeles Regional Water Quality Control Board (Regional Board) and local treatment plants actively including water recycling as a key part of future plans. We noticed and are pleased to see that Donald C. Tillman Water Reclamation Plant (WRP) who currently treats their effluent to tertiary standards, is adding the additional steps to purify their effluent further, in order to recharge groundwater within the San Fernando Basin (**Table F-4, p. F-15**).



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In order to help all three WRPs' recycling efforts in a similar way to what was done in the Monitoring and Reporting Program in the latest permit for Hyperion Treatment Plant (effective April 1, 2017; **Sec. X.C.4**), we request that the Tentative WDRs include a requirement for all three WRPs to submit a "recycled water progress report" along with each NPDES Annual Summary Report to the Regional Board. As the Regional Board mentions in its response to Hyperion Treatment Plant's comments (response to Los Angeles Waterkeeper's first comment, p. 57 of "Response to Comments," January 20, 2017), it will serve the purpose to "encourage water recycling and to communicate progress on the Permittee's recycling program."

Considering reporting, within Hyperion's recent WDR permit that becomes effective on April 1, 2017, the plant's supervisors were asked to report to Heal the Bay (in addition to local public and environmental health officers) if and when any unauthorized discharge of sewage occurs in an amount greater than 1000 gallons (**Section VI.C.6.c.i.** of all three permits). We request that a similar requirement be included in the Tentative WDRs so that Heal the Bay can continue to be an effective partner in public notification about these issues.

Finally there are some minor type errors: there is an unnecessary red six at the top of page 3 of the Fact Sheet for the Tillman WRP WDR (F-3). Also the date for the Public Hearing for the Tillman WDR is *November 10, 2016* instead of *March 2, 2017*.

Thank you for your consideration of these comments. If you have any questions please feel free to contact us at (310) 451-1500.

Sincerely,

Steven Johnson
Water Resources Policy Analyst
Heal the Bay