



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
www.lacsd.org

GRACE ROBINSON HYDE  
Chief Engineer and General Manager

March 17, 2014  
File No. 31-370-40.4A



Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 958812-0100

Dear Ms. Townsend:

### **Comment on California Department of Transportation Municipal Separate Storm Sewer System Permit Proposed Permit Amendment to Incorporate Implementation Requirements for Total Maximum Daily Loads**

The Santa Clarita Valley Sanitation District of Los Angeles County (Sanitation District) appreciates the opportunity to comment on the proposed Municipal Separate Storm Sewer System Permit Amendment (Permit Amendment) to incorporate implementation requirements for Total Maximum Daily Loads (TMDLs). The Sanitation District operates the Valencia and Saugus Water Reclamation Plants, which provide primary, secondary, and tertiary treatment to produce recycled water that is reused or discharged to the Upper Santa Clara River.

The Sanitation District would like to provide clarification regarding the Upper Santa Clara River Chloride TMDL, which is described on page 150 of the Permit Amendment. The Final Chloride Waste Load Allocations (WLAs) described in the Permit Amendment are conditional WLAs that would apply and supersede the existing WLA of 100 mg/L Cl only when chloride load reductions and/or chloride export projects are in operation by the Sanitation District. On October 28, 2013 the Sanitation District's Board of Directors approved a project to comply with the existing WLA of 100 mg/L Cl, which effectively discontinued efforts to comply with the conditional WLAs. To reflect the existing WLA of 100 mg/L Cl, the Sanitation District respectfully requests that the following modifications be made to page 150 of the Permit Amendment:

#### **Final Chloride WLA**

*Other minor NPDES discharges receive ~~conditional~~ WLAs shown below*

<b>Reach</b>	<b>Concentration-based <del>Conditional</del> WLA for Chloride (mg/L)</b>
6	<del>100 150 (12-month Average)</del>
	<del>230 (Daily Maximum)</del>
5	<del>100 150 (12-month Average)</del>
	<del>230 (Daily Maximum)</del>
4B	<del>n/a 117 (3-month Average)</del>
	<del>230 (Daily Maximum)</del>

**Final Chloride WLA Specific to the Department**

*The Department is assigned the above concentration based WLAs.*

**Final Chloride Deadlines**

*The ~~interim and~~ final WLAs for TDS and sulfate contained in this Basin Plan Amendment are essentially established for the principal sources. The Department does not import water and does not use self-generating water softeners. The Department is expected to be in compliance with the Chloride WLA without any additional control actions as long as the Department is in compliance with this Order.*

The Sanitation Districts thank you in advance for your consideration of this comment. If you have any questions concerning this letter or need additional information, please contact Mike Sullivan at (562) 908-4288, extension 2801.

Very truly yours,  
Grace Robinson Hyde



Mike Sullivan  
Section Head  
Monitoring Section

MS:AH:MB:lmb

cc: Samuel Unger, Los Angeles RWQCB