



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE
Chief Engineer and General Manager

August 28, 2015
File No. 31-370-40.4A

Via Electronic Mail

Mr. Samuel Unger
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Dear Mr. Unger:

Comment Letter – LA County MS4 Permit EWMPs

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to provide comments on the draft Enhanced Watershed Management Programs (EWMPs) submitted pursuant to the Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit. The Sanitation Districts are a confederation of 24 independent special districts that provide for the water pollution control and solid waste management needs of approximately five million people in 78 cities and unincorporated areas of Los Angeles County. The Sanitation Districts own and operate 11 wastewater treatment plants and maintain approximately 1,400 miles of sewer lines, which convey flows from industries and municipalities within service areas to the aforementioned wastewater treatment plants. The Sanitation Districts have reviewed the various draft EWMPs as they pertain to our facilities. Specifically, we have comments regarding the Palos Verdes Peninsula Water Management Group (PV Group) EWMP relating to two of our facilities: the Joint Water Pollution Control Plant (JWPCP) and the Palos Verdes Landfill Main Site (PVLf Main Site), which are described below.

Joint Water Pollution Control Plant

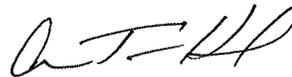
As part of the water quality priority analysis, the PV Group EWMP completed a source assessment for the watershed management area. The source assessment identifies and describes various National Pollutant Discharge Elimination System (NPDES) sources and non-point sources. The Sanitation Districts' JWPCP is included in the NPDES sources discussion and is described as "...the Los Angeles County Joint Water Pollution Control Plant and discharges into the Santa Monica Bay." (page 2-33). The JWPCP discharges to the Palos Verdes Shelf; however, not the Santa Monica Bay as stated in the PV Group EWMP. As such, we request that the PV Group EWMP is amended to state "...the Los Angeles County Joint Water Pollution Control Plant and discharges ~~into to the coastal waters of the Santa Monica Bay~~ Palos Verdes Shelf." to accurately describe the discharge location.

Palos Verdes Landfill

The PV Group EWMP includes a section explaining the selection of water quality control measures, one of which is structural regional best management practices (BMPs). The PV Group EWMP identifies existing, planned, and proposed regional BMPs within the watershed management area. More specifically, the Machado Lake Watershed area includes a proposal to place treatment BMPs on or adjacent to the closed PVLf Main Site. We appreciate that the PV Group recognizes significant work is needed to investigate the feasibility of this proposal. If a BMP is considered on the PVLf Main Site, either a storage-and-treatment facility or a subsurface flow lined-wetland, implementation of the BMP will need to overcome significant land use and technical challenges. The Sanitation Districts are currently responsible for the operation and maintenance of the environmental control systems at PVLf Main Site under a Joint Powers Agreement with the County of Los Angeles. Additionally, the County of Los Angeles is ultimately responsible for the recreational development and use of the PVLf Main Site. As such, any project encompassing jurisdictional land use changes will require involvement and approval from the County of Los Angeles. Moreover, if implementation of the regional BMP results in interruption of the environmental control system or disturbance of the final landfill cover at the PVLf Main Site, all related geotechnical and environmental issues will require review and approval from the Department of Toxic Substances Control (DTSC) that provides regulatory oversight of the closed Palos Verdes Landfill. For the aforementioned reasons, the Sanitation Districts recommend that the PV Group coordinate with our agency as well as Los Angeles County, DTSC, and other pertinent agencies if the feasibility of PVLf Main Site Regional BMP is going to be further evaluated.

If you have any questions or need further information, please contact Shannon Bishop at (562) 908-4288, extension 2843 or sbishop@lacsdsd.org.

Very truly yours,



Ann T. Heil
Section Head
Monitoring Section

ATH:SAB:lmb

cc: Renee Purdy, Ivar Ridgeway