



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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Via Electronic Mail

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear Ms. Townsend:

Comment Letter – Desalination Amendments

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to provide comments on the July 2014 Proposed Amendments to the Water Quality Control Plan for Ocean Waters of California (Ocean Plan) Addressing Desalination Facility Intake, Brine Discharges, and the Incorporation of Other Nonsubstantive Changes (Desalination Amendments). The Sanitation Districts are a confederation of 23 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, CA. The Sanitation Districts own and operate 11 wastewater treatment plants, one of which discharges to the Pacific Ocean one and a half miles offshore of Palos Verdes at a depth of approximately 200 feet. The Sanitation Districts have conducted extensive monitoring of coastal conditions near our ocean outfall for more than 35 years and have considerable experience and knowledge in the assessment of water and sediment quality impacts on coastal conditions. The following comments are respectfully submitted based upon this expertise and with the intent to clarify the intent of the Desalination Amendments.

Our primary concern is that the Desalination Amendments and the associated Draft Staff Report do not adequately distinguish between seawater desalination and non-seawater desalination, such as desalination of recycled water and brackish groundwater. Brines from non-seawater desalination are significantly less saline than brines from seawater desalination, and therefore have positive buoyancy. It is our understanding that the State Water Resources Control Board considered the need for additional regulation of non-seawater desalination brines during the early stages of development of the Desalination Amendments, but found that additional regulation was not warranted. The Scientific Advisory Panel formed to examine brine discharges found that the regulatory approach in the existing Ocean Plan is adequate for positively buoyant plumes, as documented in the “Management of Brine Discharges to Coastal Waters - Recommendations of a Scientific Advisory Panel” prepared by SCCWRP in 2012.

The proposed addition to the Ocean Plan of implementation provisions for desalination facilities is specifically limited to desalination facilities using seawater, and the Sanitation Districts support this limitation. Inappropriate regulation of non-seawater desalination brines could impact our ability to beneficially reuse over 250 million gallons per day of recycled water produced at our Joint Water Pollution Control Plant, hindering the state’s goals of improving the reliability and sustainability of its water supply. However, the Draft Staff Report is confusing with respect to seawater and non-seawater desalination. In many places it uses the general terms “desalination” and “brine” when referring only to seawater

desalination and brines generated from such desalination. This could lead readers to incorrect conclusions regarding the nature of non-seawater desalination and brines, which in turn could have adverse consequences relating to recycled water projects that discharge brine from advanced treatment processes. To provide more clarity in the Draft Staff Report, we recommend specifically using the term “seawater” with the terms “desalination” and “brine” when referring to seawater desalination and seawater desalination brines. The following sections may need to be revised to provide this clarity: Section 2.1 (Page 12), Section 7.1.6 (Page 36), Section 8.6.5 (Page 93), and Section 8.7 (Page 93).

Additionally, the proposed amendments to the Ocean Plan, as indicated in the appendix to the Draft Staff Report, could be interpreted as unintentionally requiring that the new salinity monitoring and reporting provisions apply to all brine discharges, not just those from seawater desalination facilities. Imposition of additional monitoring requirements on brine discharges from water recycling facilities has not been justified, particularly in light of the Science Advisory Panel findings mentioned above. Any imposition of new monitoring requirements on brine discharges from water recycling projects should be carefully considered, given the critical need to increase recycled water usage in the state. We therefore recommend the following revision, to eliminate any ambiguity in the monitoring and reporting requirements:

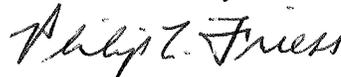
- Appendix III, page 67: “Seawater dDesalination facilities discharging brine into ocean waters shall monitor salinity as described in chapter III.L.4.”

Finally, the current version of the Ocean Plan contains a typographical error in Figure VIII-5 on Page 86 of Appendix VIII. The Sanitation Districts’ facility should be labeled “LA County Sanitation Districts JWPCP” instead of “Los Angeles County JWPCP Carson NP.” We would like to request correction of this as part of the non-substantive changes made during this reopening of the Ocean Plan.

If you have any questions or need additional information, please contact Lysa Gaboudian at (562) 908-4288, extension 2811 or lgaboudian@lacsdsd.org.

Very truly yours,

Grace Robinson Hyde



Philip L. Friess

Department Head

Technical Services

PLF:LG:nm