Message

**From**: Stuber, Robyn [Stuber.Robyn@epa.gov]
**Sent**: 8/6/2018 12:23:39 AM
**To**: Morris, Cris@Waterboards [Cris.Morris@waterboards.ca.gov]
**CC**: Owens, Cassandra@Waterboards [Cassandra.Owens@waterboards.ca.gov]; Aston, Rosario@Waterboards [Rosario.Aston@waterboards.ca.gov]; Smith, DavidW [Smith.DavidW@epa.gov]
**Subject**: RE: Castaic

Thank you!

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**From:** Morris, Cris@Waterboards [mailto:Cris.Morris@waterboards.ca.gov]
**Sent:** Friday, August 03, 2018 6:44 PM
**To:** Stuber, Robyn <Stuber.Robyn@epa.gov>
**Cc:** Owens, Cassandra@Waterboards <Cassandra.Owens@waterboards.ca.gov>; Aston, Rosario@Waterboards <Rosario.Aston@waterboards.ca.gov>; Smith, DavidW <Smith.DavidW@epa.gov>; Stuber, Robyn <Stuber.Robyn@epa.gov>
**Subject:** RE: Castaic

Interesting note regarding the NDMA.

Cassandra is back and Rosario has requested the detailed lab reports for the Bis-2 and the NDMA. After we receive the info, then we will schedule a meeting with LADWP to discuss. I don't think the Tentative is going out any time soon. We will keep you in the loop.

Cris

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**From:** Stuber, Robyn <Stuber.Robyn@epa.gov>
**Sent:** Friday, August 3, 2018 4:24 PM
**To:** Morris, Cris@Waterboards <cris.morris@waterboards.ca.gov>
**Cc:** Owens, Cassandra@Waterboards <cassandra.owens@waterboards.ca.gov>; Aston, Rosario@Waterboards <rosario.aston@waterboards.ca.gov>; David W. Smith <smith.davidw@epa.gov>; Robyn Stuber <Stuber.Robyn@epa.gov>
**Subject:** FW: Castaic

Hi Cris,

I wanted to follow-up with where you are on Bis-2 and NDMA for Castaic, as we talked about this past Tuesday. Let's talk next week before the permit is public noticed.

As an aside, in addition to the production of rocket fuels which we discussed, I was reading that NDMA can be found in some cutting oils used for machining metals. This could be a possible way NDMA entered the effluent.

Thanks
Robyn

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**From:** Stuber, Robyn
**Sent:** Monday, July 30, 2018 10:30 AM
**To:** 'Morris, Cris@Waterboards' <Cris.Morris@waterboards.ca.gov>
**Cc:** Aston, Rosario@Waterboards <Rosario.Aston@waterboards.ca.gov>; Chen, Jau Ren@Waterboards <Jauren.chen@waterboards.ca.gov>; 'Owens, Cassandra@Waterboards' <Cassandra.Owens@waterboards.ca.gov>;

Smith, DavidW <smith.davidw@epa.gov>
**Subject:** RE: Castaic

Hi Cris,

Thanks for flagging this again for me. Let's reach a conclusion for you on this during our call tomorrow at 1.

Generally, I believe our office's advice to permitting authorities on this topic has been that if data are acceptable for NPDES reporting from a QA/QC standpoint, the data are acceptable for supporting an affirmative RP decision and the resulting WQBEL. As a permit writer, myself, prefer to not get drawn down into the rabbit hole "representative", particularly where permit writers considering "representative" and using the same information can reach different conclusions. This type of terminology—applied to the RPA—can become a rather gaping loophole in the WQBEL-setting process, depending on how permitting authorities exercise their discretion (e.g., RB5).

As a result, where data meeting QA/QC suggest that a pollutant is greater than the water quality criterion/objective, I typically support a conservative approach to an RP determination and setting a WQBEL. If effluent concentrations for the pollutant are truly low (i.e., the monitored result represents a drastically atypical condition for the effluent), a permittee should be able to meet the new WQBEL. I think this is a solid approach to follow, particularly, when monitoring costs are low and you are looking for consistency across permits issued by the Board.

That said, I'm open to discussing all options for this particular case. I may call Rosario today to get a better understanding of the particulars and be better prepared for our call tomorrow.

Robyn

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**From:** Morris, Cris@Waterboards [mailto:Cris.Morris@waterboards.ca.gov]
**Sent:** Monday, July 30, 2018 9:08 AM
**To:** Stuber, Robyn <Stuber.Robyn@epa.gov>
**Cc:** Aston, Rosario@Waterboards <Rosario.Aston@waterboards.ca.gov>; Chen, Jau Ren@Waterboards <Jauren.chen@waterboards.ca.gov>
**Subject:** RE: Castaic

Robyn, we are trying to move ahead on the Castaic permit. Have you had a chance to look at these Discharger's requests. We have and we propose accepting their recommendations. We are finalizing the draft and will send a copy for your review this week. If you do have reservations about accepting any of these recommendations, please let us know right away.

Thanks much,
Cris

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**From:** Morris, Cris@Waterboards
**Sent:** Wednesday, July 18, 2018 12:40 PM
**To:** Robyn Stuber (Stuber.Robyn@epamail.epa.gov) <Stuber.Robyn@epamail.epa.gov>
**Cc:** Owens, Cassandra <Cassandra.Owens@waterboards.ca.gov>; Chen, Jau Ren@Waterboards <Jauren.chen@waterboards.ca.gov>; Aston, Rosario@Waterboards <rosario.aston@waterboards.ca.gov>; Aston, Rosario@Waterboards <rosario.aston@waterboards.ca.gov>
**Subject:** FW: Castaic

Robyn, LADWP has requested that we take a closer look at some of the data that was used for the Castaic RPA (letter dated June 25, 2018). As a follow-up, we asked for some QA/QC backup for the lab data. The letters are attached. We have looked at the proposed modifications to the data used for the RPA and the submitted QA/QC information and we are inclined to accept their recommendations. What are your thoughts? Please let us know so we can move forward with this permit.

Cris

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**From:** Aston, Rosario@Waterboards
**Sent:** Wednesday, July 18, 2018 8:33 AM
**To:** Morris, Cris@Waterboards <cris.morris@waterboards.ca.gov>
**Cc:** Chen, Jau Ren@Waterboards <Jauren.chen@waterboards.ca.gov>
**Subject:** RE: Castaic

Hi Cris,
Here are the letters,

Thanks,
Rosario

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**From:** Morris, Cris@Waterboards
**Sent:** Wednesday, July 18, 2018 8:16 AM
**To:** Aston, Rosario@Waterboards <Rosario.Aston@waterboards.ca.gov>
**Cc:** Chen, Jau Ren@Waterboards <Jauren.chen@waterboards.ca.gov>
**Subject:** Castaic

Rosario, could you please send me the request letter from LADWP concerning relaxing the limits in the draft permit? I would like to see it and to share it with Robyn.

Thanks,

*Cris*