From:	Stuber, Robyn
To:	Engle, Kelly
Subject:	FW: Review of draft NPDES permit for LACSD Whittier Narrows WRP
Date:	Wednesday, April 29, 2015 10:42:00 AM
Attachments:	Legal review request LACSD Whittier Narrows.xls Whittier Narrows WRP Working Draft NPDES Permit 7-02-2014 (with TOX as Trigger).docm WNWRP CA0053716 NH3 Limits for SG River and Rio Hondo (5-20-14) Used 1-hr TMDL WLA.xlsx Whittier Narrows WRP - Limit Comparison Table (preliminary with Tox narrative).docx

---

Robyn A. Stuber ● (415) 972-3524
U.S. EPA Region 9 ● NPDES Permits Section (WTR-2-3)
75 Hawthorne Street ● San Francisco, CA 94105

From: Hung, David@Waterboards [mailto:David.Hung@waterboards.ca.gov]
Sent: Thursday, July 03, 2014 9:34 AM
To: McChesney, Frances@Waterboards; Fordyce, Jennifer@Waterboards; Kuenzi, Nicole@Waterboards; Stuber, Robyn
Cc: Medina, Raul@Waterboards; Morris, Cris@Waterboards
Subject: Review of draft NPDES permit for LACSD Whittier Narrows WRP

Hi all,

Please find the draft NPDES permit for Whittier Narrows WRP and attachments for your review. Raul did a great job on this and summarized some pertinent facts and issues are highlighted below. Your review and comments by 7/18 is very much appreciated. Please feel free to contact Raul, Cris or me any time during your review if you have any questions. Thanks in advance for your time and review.

Robyn: I would like to brief you after you return to the office on 7/9 re our approach for chronic toxicity approach (trigger) and ammonia SSO we applied to this permit.

Draft Permit highlights:

1. This draft permit used the recently adopted Simi Valley Permit as a template.
2. Whittier discharges into two watersheds; (a) San Gabriel River and (b) Rio Hondo/Los Angeles River.
3. Whittier recycles/reuse 1% of the effluent and the remaining discharge goes to the Montebello Forebay for groundwater recharge.
4. New effluent limitations for 2,3,7,8-TCDD, benzo(k) fluoranthene, dibenzo(a,h) anthracene, and indeno(1,2,3-cd)pyrene.
5. Implements the Ammonia 30-day SSO, per resolution no. R12-010. (in anticipation that the resolution would be approved by USEPA before this permit goes out for public review or adoption). However, this draft does not incorporate the PBEL/performance based component of the resolution because the methodology on how to calculate PBEL has not been derived by the LA River stakeholder group. This draft permit implements the chronic toxicity 1.0 TUc as a trigger for accelerated monitoring.
6. This draft permit has no TST-related monitoring requirements.

Legal review list:

1. The permittee requested to remove section VI.A.2.l, page 13 of the Order. The deletion is requested because this requirement is already covered by the general permit for storm water discharges associated with industrial activities, where the Whittier Narrows WRP is enrolled under WDID No. 419I007151.
2. The Permittee requested to insert a provision in section VI.C.5.b. (Pretreatment), page 22 of the Order and 5d (Bypass), page 22,23 of the Order. The pretreatment proposed language was previously used in the 2004 San Jose Creek WRP NPDES permit (R4-2004-0097). The Bypass language is requested to provide clarification for filter bypass conditions. This language was previously used in the 2002 NPDES permit for the Long Beach WRP but it was inadvertently not included in later permits.
3. The Permittee requested to insert a finding regarding "Performance Goals" on page F-17. This finding was included in the 2002 WDR, Order No. R4-2002-0142 but was not carried forward in the current permit.
4. Anti-backsliding and antidegradation discussions.

-

<u>USEPA review list:</u>

1. Ammonia effluent limitation
    a. San Gabriel River Discharge (Discharge Point 001) – applies Basin Plan amendment 30-day SSO objective in the calculation of ammonia limits. Current permit effluent limitations were calculated in the same manner as this draft permit.
    b. Rio Hondo/Los Angeles River (Discharge Points 002, 003, & 004) – applies the 30-day SSO objective per resolution R12-010. (See also item #5, Draft Permit highlights). Only 1% of the discharge will go to LA River.
    c. Metals TMDLs (San Gabriel and LA River) calculations yield very similar effluent limitations as compared to the current permit.
    d. Chronic toxicity 1.0 TUc implemented as a trigger for accelerated monitoring.
    e. TST methodology is not implemented in this draft permit.