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Public Comment
Statewide Bacteria Objectives- Scoping
Deadline: 2/20/15 by 12:00 noon

COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

GRACE ROBINSON HYDE
Chief Engineer and General Manager

February 20, 2015
File No. 31-370-40.4A



VIA ELECTRONIC MAIL

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

Dear Townsend,

Comment Letter - Statewide Bacteria Objectives – Scoping Comments.

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to provide comments on the Amendments to Water Quality Control Plans for Inland Surface Waters, Enclosed Bays and Estuaries and Ocean Waters of California for Statewide Water Contact Recreation Bacteria Objectives (2015 Statewide Bacteria Objectives). The Sanitation Districts are a confederation of 24 independent special districts that provide for the wastewater treatment 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, including the Joint Water Pollution Control Plant (JWPCP) that discharges treated and disinfected effluent to the Pacific Ocean one and a half miles offshore of Palos Verdes at a depth of approximately 200 feet. Sanitation Districts' staff attended the February 10th public scoping meeting for the 2015 Statewide Bacteria Objectives. The Sanitation Districts thank the State Water Resources Control Board (State Water Board) for their work on revising these objectives.

Under the NPDES permit for the JWPCP, the Sanitation Districts conduct bacteriological monitoring of the shoreline and inshore waters, and provide results of the shoreline monitoring to the Los Angeles County Department of Public Health (LACDPH) for purposes of public health assessment and to ensure protection for public recreational use of coastal ocean waters. The LACDPH is guided by AB411 legislation for beach management, which includes single sample maximum (SSM) limits for three indicators. Under AB411, the LACDPH posts advisories against water contact and initiates repeat sampling at beaches when a SSM level is exceeded. When the subsequent sample result is below the SSM level, the advisory is lifted.

Our primary concern is that there is potential for an unnecessary increase in sampling work and confusion if the statistical threshold value (STV) is adopted in place of the SSM for beach monitoring. Specifically, the majority of beach sampling in LA County is conducted once weekly. Under the existing legislation, when a sample exceeds the SSM (e.g. 104 CFU/100 ml for enterococcus), the LACDPH is alerted so they can post an advisory at the beach, and accelerated sampling is initiated by the Sanitation Districts. Typically, a repeat sample is available within 72 hours. If the sample is below the SSM, the LACDPH removes the advisory and sampling returns to weekly. By comparison, using a STV (e.g. 130

CFU/100 ml for enterococcus) and a permitted exceedance level of 10% in a 30 day period, one sample above the STV would immediately increase the STV exceedance from 0% to 20% or 25%, since only 4-5 samples are taken per month. The State Water Board does not have authority over the LACDPH and could not require that this method be used to post an advisory at the beach. However, if LACDPH follows this method, accelerated sampling would need to be continued for at least five consecutive days regardless of the result to bring the moving 30-day STV exceedance rate back below 10%. This would require significant additional sampling, and might also extend the advisory posting period for the beach at least four to five days longer than the current approach despite "clean" samples being reported on the additional sampling days. This may not be an issue immediately because the LACDPH and other health agencies in California will likely continue to abide by AB411. A practical solution would be to specify that, for beach advisory postings, a single accelerated sample below the STV is adequate to lift the advisory and return sampling to normal frequency.

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

Very truly yours,

Grace Robinson Hyde



Ann T. Heil

Supervising Engineer

Technical Services Department

ATH:LG:lmb