

RESPONSE TO COMMENTS

Tentative WDRs/NPDES Permit General NPDES Permit for Discharges of Treated Groundwater from Investigation and/or Cleanup of Volatile Organic Compounds-Contaminated Sites to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties
Tentative Order No. R4-2024-XXXX
NPDES No. CAG914001

Comment Letter dated January 16, 2024, from Sierra Club Angeles Chapter and Heal the Bay,

#	Comments	Response	Action Taken
A1	The Regional Board shall provide publicly accessible data for the total volume of water loss authorized under the Tentative permit, to be updated annually and provided in coordination with volume reports provided for the WDR for Discharges of Groundwater from Construction and Project Dewatering.	<p>The Los Angeles Water Board appreciates the commenters' efforts to ensure that water quality is protected and that pumped groundwater discharges from general permit covered activities are put to proper reuse. As we responded to the commenters' comment on the same issue for Order No. R4-2023-0429, General NPDES permit for <i>Discharges of Groundwater From Construction and Project Dewatering to Surface Waters</i>, all dischargers are required to monitor their discharge volume during their enrollment periods under this General Order. The dischargers have been reporting the discharge volumes in their quarterly self-monitoring reports. The reports are available to the public upon request.</p> <p>However, in consideration of the commenters' concern, Table G-2 of the sample monitoring and reporting program (MRP) is revised during issuance of Notice of Applicability to require dischargers to submit the total annual discharge volumes in their</p>	Revisions were made.

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		<p>annual report at the end of each year or at the end of investigation and/or cleanup activities.</p> <p>In addition, the Los Angeles Water Board will initiate the process of compiling the discharge volumes from the facilities enrolled in this General Order and in the future will make it available on our website of the total annual volume of discharges from all enrollees under this general order as well as construction dewatering general permit enrollees.</p> <p>In the interim, as a pilot effort, Los Angeles Water Board staff reviewed the reported volumes of treated water discharges from all seven enrollees under this General Order. In 2023, three out of seven enrollees were active and discharged their treated water to surface water. The combined reported average daily discharge rate was about 0.16 million gallons per day (MGD) from the three active enrollees for the period from January to September 2023. For the year 2022, there were five active enrollees out of seven, and the reported average daily discharge rate was 0.20 MGD.</p>	
A2	We thank the Regional Board for acknowledging the importance of groundwater regulation and management during the December Board Hearing;	As the Los Angeles Water Board directed to staff during the December 2023 Board meeting regarding the same issue on beneficial reuse of extracted and treated groundwater and	No action was taken.

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	<p>unfortunately, many of the sub-basins in the Los Angeles area are considered low priority under the Sustainable Water Management Act (SGMA), and local action on dewatering is unlikely to take precedence with this statewide program until that designation is changed. We therefore urge the Regional Board to take leadership in this local groundwater management issue, and reconsider requirements for beneficial reuse of all groundwater extracted from investigation and/or cleanup sites, once properly remediated.</p>	<p>groundwater basin management, Los Angeles Water Board staff will reach out to other state agencies that oversee groundwater management and bring their attention to the commenters' concern. Further, the Los Angeles Water Board will consider bringing this concern to the Regional Oversight Committee of the Safe Clean Water Program and may form a sub-committee to actively engage with agencies that are responsible for groundwater management to manage groundwater quantity.</p> <p>In addition, the Los Angeles Water Board strongly encourages water recycling, water conservation, and reuse of extracted/treated groundwater. The tentative Order requires the dischargers to evaluate the feasibility of recycling, conservation, and/or other alternative disposal methods, and submit the feasibility study with their Notice of Intent (NOI) (section II.D.2.d & e of WDR).</p>	
A3	<p>Staff correction of typographical on the NOI Form</p>	<p>On page C-1 of the NOI Form, Section C, typographic errors were corrected to change contact address to facility address to make it clear that it is only facility specific information that is required, therein.</p>	<p>Revisions were made.</p>