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Department of Water and Power



the City of Los Angeles

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December 28, 2010

Mr. Samuel Unger, Executive Officer California Regional Water Quality Control Board Los Angeles Region 320 West 4TH Street, Suite 200 Los Angeles, California 90013

Attention: Ms. Brandy Outwin-Beals

Mr. Don Tsai

Dear Mr. Unger:

Subject: Tentative Order No. R4-2011-XXXX Amending Waste Discharge Requirements and Water Recycling Requirements in Order No. R4-2003-0134 for the Harbor Water Recycling Project – Dominguez Gap Barrier Project (File No. 97-208)

On behalf of the Los Angeles Department of Water and Power, the Water Replenishment District of Southern California, the City of Los Angeles Department of Public Works and the County of Los Angeles Department of Public Works, we would like to thank you and your staff for finalizing the amendment for modifying the Harbor Water Recycling Project (HWRP) permit, Order No. R4-2003-0134 regarding the blending station requirements.

The co-permittees are in support of the proposed amendment as written, with the exception of Requirement 4 and request that the wording be modified to delete the reference to the "draft" regulations.

Requirement 4 specifies that at such time that the Advance Water Treatment Facility (AWTF) would undergo any modifications or expansions that these modifications would be subject to the <u>draft</u> or final groundwater recharge regulations (GRR). Draft regulations are subject to change and capital improvements or other expenditures for compliance with draft requirements have the potential to be unnecessary costs.

Even though the HWRP currently incorporates many of the sections of the draft GRR, it is our understanding that the California Department of Public Health (CDPH) is required, per Senate Bill 918, to finalize the draft GRR no later than December 31, 2013. Therefore; the

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co-permittees request that the word "draft" be eliminated from Requirement 4. If any modifications were to take place to the AWTF before 2014, they would be subject to CDPH and Regional Board approval.

Again, the co-permittees want to express their thanks to Regional Board staff for their time and look forward to working with them, the CDPH and Heal the Bay as we move forward to more effectively use recycled water.

If you need additional information, please contact Mr. Michael Hanson of the Wastewater Quality and Compliance Group at (213) 367-0634.

Sincerely,

Katherine Rubin

Manager, Wastewater Quality and Compliance Group

MH:db

c: Ms. Deborah Smith - RWQCB

Ms. Brandi Outwin-Beals - RWQCB

Catheri Pali

Mr. Don Tsai – RWQCB

Mr. Kurt Souza - CDPH

Mr. Jeff O'Keefe - CDPH

Mr. Chi Diep - CDPH

Mr. Eric Batman - LA County Department of Public Works (LACDPW)

Mr. Adam Lee - LCDPW

Mr. Ted Johnson – Water Replenishment District (WRD)

Mr. Theresa Wu - WRD

Ms. Traci Minamide.LA City Bureau of Sanitation (LACBS)

Mr. Hassan Rad - LACBS

Mr. Roshan Aflaki - LACBS

Mr. Adel Hagekhalil - LACBS

Mr. Ali Poosti - LACBS

Mr. Doug Walters - LACBS

Mr. Ken Redd - LA City Bureau of Engineering

Mr. Mark Gold – Heal the Bay

Ms. Kristen James – Heal the Bay

Ms. Susie Santilena - Heal the Bay