

**RESPONSE TO COMMENTS
SANTA CLARITA VALLEY SANITATION DISTRICT
SAUGUS WATER RECLAMATION PLANT
TENTATIVE ORDER NO. R4-2022-XXXX
NPDES NO. CA0054313**

Comment Letter dated April 18, 2022, from Santa Clarita Valley Sanitation District (SCVSD)

No.	Comment	Response	Action Taken
D1	The Santa Clarita Valley Sanitation District (Sanitation District) appreciates the opportunity to provide comments on the Tentative Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) Permit (Tentative Permit) for the Saugus Water Reclamation Plant (Saugus WRP) and the Valencia Water Reclamation Plant (Valencia WRP), dated March 2022. Additionally, we appreciate the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) staff sharing comment letters received to date for the tentative permits for Saugus and Valencia WRPs. We are reviewing these letters and will submit a detailed response to the Regional Board by April 25th. We hereby request that our response to these letters be included in the administrative record for the permits.	The deadline for submitting written comments was April 18, 2022. The letter seeks to incorporate by reference a future response to other comment letters, and proposes to submit that future response on April 25, a week after the comment deadline. The decision to accept late comments is at the discretion of the Board Chair, but typically the Los Angeles Water Board does not accept late comments to prevent surprise, avoid an undue burden on the Los Angeles Water Board, and as a matter of fairness to all parties. All parties may address the concerns of other commenters in oral comments at the Board hearing when the draft permit will be considered. This response to comments will therefore not respond to that future response.	None necessary.
D2	The Sanitation Districts greatly appreciate the effort and cooperation shown by the Regional Board staff in this permit renewal process. The Sanitation Districts also appreciate the	Comment noted.	None necessary.

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	inclusion of a 10-year compliance schedule in the Tentative Permits which are necessary to allow us to meet the newly interpreted temperature limitations in our effluent discharge and receiving waters. This timeframe is the shortest time possible for the Sanitation Districts to undertake significant study, planning, environmental review, design, construction and financing to comply with the new limitations and meet the localized needs of the environment. We look forward to working closely with the Regional Board and interested stakeholders throughout this study and compliance process.		
D3	On April 12, 2022, we provided a quarterly update to the Regional Board that provides an update on our chloride compliance project construction efforts including optimization of UV facilities (Attachment 3). We are in compliance with Time Schedule Orders (TSOs) R4-2019-0055-A02 (Valencia WRP) and R4-2019-0056-A02 (Saugus WRP) and are on track to complete the project by the current deadline. We look forward to providing an update on our efforts to the Regional Board at the May 12th permit adoption hearing.	The Los Angeles Water Board has received and reviewed the quarterly progress TSO reports from SCVSD and concur that SCVSD has complied with the TSO milestones and is on track to completing the scheduled plant upgrades by December 31, 2022.	None necessary.
D4	Attachment C, Pages C-1 Saugus WRP Process Diagram The process flow diagram was updated to better reflect plant operations. The updated diagram is attached. The active and alternative flows from the Backwash Recovery Tank were changed. Currently, backwash recovery flow is sent just after the Activated Sludge Aeration with Nitrogen Removal process. The backwash recovery flow to the influent remains available as an alternative route. The flow path after Dual-Media Pressure Filtration was updated to reflect operating the UV reactors in-series with	The process flow diagram was revised as requested.	Replaced former diagram with the updated diagram.

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	the Chlorine Contact Tanks. The lines showing ammonia and sodium hypochlorite doses after the UV reactors were changed to solid lines because a small dose is currently being added. In addition, the location of the sodium hypochlorite dose point was moved because it is downstream of the ammonia dose point. Changed "IRRIGATION" TO "IN-PLANT IRRIGATION." Updated title to " PROPOSED PROCESS SCHEMATIC – UV DISINFECTION."		
D5	MRP Table E-2 and E-3, Pages E-7 and E-11: PCBs as congeners reporting units are ug/L. PCBs as congeners have historically been reported in pg/L. We suggest changing the units for PCBs as congeners to pg/L.	The units for PCBs as congeners were revised as requested.	Changed units for PCBs as congeners to pg/L
D6	MRP Table E-5, Page E-21: PCBs as aroclors reporting units are pg/L. PCBs as aroclors have historically been reported in ug/L. We suggest changing the units for PCBs as aroclors to ug/L.	The units for PCBs as aroclors were revised as requested.	Changed units for PCBs as aroclors to µg/L

Comment Letter dated April 18, 2022, from Heal the Bay and Los Angeles Waterkeeper

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H1	The compliance history at the Facility indicates the need for a more protective permit and continued enforcement action. As stated above, the Facility discharges wastewater to the Santa Clara River, with the reasonable potential	With regards to prescribing a more protective permit, the Tentative Order is protective of human health, aquatic life, and wildlife. It includes strict limits for those pollutants where monitoring data demonstrate there is	None necessary.

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	<p>for the effluent to cause or contribute to an exceedance of WQBELs. In fact, downstream of the Saugus effluent discharge location, the Santa Clara River becomes a gaining stream fed by groundwater, but at the point of discharge, the Santa Clara River is often dry; therefore, the discharge from the Facility heavily influences downstream water quality and habitat suitability. The Santa Clara River habitat and its surrounding areas are home to 17 protected and/or endangered species, but the Santa Clara River just downstream of the Facility has, instead, become more suitable to invasive species. As discussed below, the data record for the Facility demonstrates a history of WQBEL exceedances, potentially contributing to this shift in habitat suitability. There is also a record at this Facility of visible floating particulates in the effluent, missed sampling events, and various other quality control issues. It is critical that the Regional Board ensure the protection of the Santa Clara River's ecological integrity through the adoption of a more protective permit, pursuant to the following recommendations, accompanied by continued enforcement action.</p>	<p>reasonable potential for the discharge to cause or contribute to an exceedance of the applicable water quality objective. The effluent limitations in the Tentative Order are as stringent as those in the prior permit, Order Number R4-2015-0072, with the exception of the limitations for copper, mercury, nickel, zinc, cyanide, and benzo(a)anthracene. The final effluent limitations for these pollutants are removed in the Tentative Order because the discharge did not show reasonable potential to cause or contribute to an exceedance of the applicable water quality objective for these pollutants based on the most recent monitoring data. Specifically, six and a half years of monitoring data, collected from May 2015 to October 2021, indicate the effluent concentrations of these pollutants are two to 20 times lower than corresponding water quality objectives, which were established for the protection of the beneficial uses of the Santa Clara River.</p> <p>Regarding continued enforcement action, enforcement staff investigate exceedances of WQBELs and take appropriate enforcement action for violations of permit requirements as required by and consistent with the California Water Code and State Water Resources Control Board's Water Quality Enforcement Policy.</p>	

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		Any unresolved violations of Order No. R4-2015-0072 can still be addressed as appropriate after permit renewal. The Tentative Order states that "Order Number R4-2015-0072 is rescinded upon the effective date of this order <i>except for enforcement purposes...</i> " Additionally, any WQBEL exceedances are considered in the reasonable potential analysis conducted as part of the permit renewal process to determine what effluent limitations are included in the renewed permit, as discussed above.	
H2	<p>The Regional Board must enforce that instream water temperature shall not exceed 80°F, or be raised by more than 5°F, as a result of waste discharge. Warmer water temperatures negatively affect the beneficial uses for humans as well as the organisms that rely on these water sources for survival. Water temperature influences the types of aquatic life that are able to survive and reproduce in the river. An increase in temperature also increases the rate of decaying organic matter, which then depletes the supply of oxygen. This could lead to hypoxic conditions as warm water also holds less dissolved oxygen.</p> <p>As stated on page F-31 of the Tentative Permit, the Los Angeles Basin Plan contains specific water quality objectives for waters designated as warm freshwater habitat (WARM), such as the Santa Clara River, such that "water temperature shall not be altered by more</p>	<p>The Santa Clarita Valley Sanitation District will be subject to a compliance schedule and an 86°F interim effluent limit because the Saugus WRP cannot consistently comply with the following Basin Plan temperature water quality objectives:</p> <p><i>The natural receiving water temperature of all regional waters shall not be altered unless it can be demonstrated to the satisfaction of the Regional Board that such alteration in temperature does not adversely affect beneficial uses. Alterations that are allowed must meet the requirements below.</i></p> <p><i>For waters designated WARM, water temperature shall not be altered by more than 5 °F above the natural temperature. At no time shall these WARM-designated</i></p>	None necessary.

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	<p>than 5°F above the natural temperature. At no time shall these WARM-designated waters be raised above 80°F as a result of waste discharges.”</p>	<p><i>waters be raised above 80 °F as a result of waste discharges.</i></p> <p>The cause of the five-degree temperature difference in the receiving water has not been identified conclusively and may be due to multiple factors. SCVSD will prepare and implement a technical workplan to evaluate the impact of the effluent on the receiving water temperature and potential management options as required in the compliance schedule.</p> <p>The Tentative Order also contains separate final effluent limitations and monitoring and reporting requirements for biochemical oxygen demand and dissolved oxygen for the protection of aquatic life. These requirements address concerns related to depletion of dissolved oxygen in the receiving water.</p> <p>Refer to the response to Comment H1 above regarding enforcement.</p>	
H3	<p>Exceedances of the temperature water quality objectives are not sufficiently addressed in the compliance summary of the Tentative Permit. We offer an additional temperature data summary.</p> <p>To better understand the temperature impacts of the Facility, we compiled all of the temperature data reported for 2021 through the California Integrated Water Quality System Project (CIWQS). We have done this to provide examples, and we urge the</p>	<p>The compliance summary discussion in the Fact Sheet focuses on compliance with the “end of pipe” final effluent limitations contained in the current permit, Order No. R4-2015-0072.</p> <p>The temperature effluent limitation in the current permit, Order No. R4-2015-0072, is different than the one proposed in the Tentative Order. Specifically, Order No. R4-</p>	<p>Remove temperature exceedances from the Compliance Summary.</p>

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	<p>Regional Board to re-examine previous years' data, as well. Although there have only been 2 violations of the interim effluent of 86°F, as reported in the compliance summary for the Tentative permit, data from June through October of 2021 reveal that the effluent temperature exceeded 80°F on 16 occasions over a 5-month period. Discharge during these months also resulted in receiving water temperatures above 80°F at RSW-002D on 7 occasions over this same 5-month period. The complete 2021 temperature data set is shown in Attachment 1.</p> <p>Although there have been clear exceedances just within this past year of the Basin Plan requirement that "at no time shall these WARM-designated waters be raised above 80°F as a result of waste discharges," only 2 violations have been determined for the entire permit term. Regardless of the interim effluent limit allowed in this permit, the 7 instream exceedances (in 2021 alone) are clear violations of the Basin Plan requirements.</p>	<p>2015-0072 contains the following effluent limitation in section IV.A.3.a. for temperature: The temperature of wastes discharged shall not exceed 86°F except as a result of external ambient temperature.</p> <p>Therefore, under the 2015 permit, final effluent temperature measurements above 80°F but less than 86°F were not exceedances of the permit limit and neither were measurements above 86°F if they were due to high ambient temperature. The two exceedances noted on page F-9 of the Compliance Summary of the Tentative Order are not reported violations because they were both recorded on days with high ambient air temperature. Since these exceedances are not considered violations, they were removed in the Revised Tentative Order.</p> <p>Similarly, the current NPDES Order No. R4-2015-0072 also contains the following receiving water limitation in section V.A.1 for temperature: For waters designated with a warm freshwater habitat (WARM) beneficial use, the temperature of the receiving water at any time or place and within any given 24-hour period shall not be altered by more than 5°F above the natural temperature due to the discharge of effluent at the receiving water station located downstream of the discharge.</p>	

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		<p>Natural conditions shall be determined on a case-by-case basis.</p> <p>If the receiving water temperature, downstream of the discharge, exceeds 86°F as a result of the following:</p> <ul style="list-style-type: none"> a. High temperature in the ambient air; or, b. High temperature in the receiving water upstream of the discharge, then the exceedance shall not be considered a violation. <p>The cause of the five-degree temperature difference in the receiving water has not been identified conclusively and may be due to multiple factors. SCVSD will prepare and implement a technical workplan to evaluate the impact of the effluent on the receiving water temperature and potential management options as required in the compliance schedule.</p> <p>The Tentative Order proposes a final effluent limitation of 80 °F and an interim effluent limitation of 86 °F. The interim effluent limitation is included in the Tentative Order because based on past effluent temperature data, the discharge is not able to consistently meet the newly interpreted final effluent limitation of 80 °F. This provides the discharger with additional time it needs to come into compliance with this new effluent</p>	

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		<p>limitation based on the newly interpreted water quality objective.</p> <p>Refer to the response to Comment H1 above regarding enforcement.</p>	
H4	<p>The Regional Board must take immediate enforcement action in response to exceedances of the Los Angeles Basin Plan temperature requirements, and remove the interim effluent limitation for water temperature.</p> <p>Upstream of the Facility's effluent discharge, the Santa Clara River is often dry. Therefore, the discharge from the Facility heavily influences downstream water quality and habitat. The data from 2021 indicate that effluent temperatures frequently exceeded 80°F during the summer months, and that the receiving waters were frequently raised above 80°F as a result of waste discharges. This can no longer be allowed.</p> <p>The Regional Board must take immediate enforcement action in response to the exceedances discussed above to ensure that future effluent discharge does not increase instream water temperature above 80°F, thereby creating conditions suitable for invasive species. At a minimum, the Regional Board must address the 7 instream violations identified in 2021, as well as any other event when instream water temperature exceeded 80°F as a result of waste discharge throughout the permit term. The Regional Board must also remove the interim effluent limitation for water temperature, which is currently allowing effluent water temperatures up to 86°F, far above what</p>	<p>Refer to the response to Comments H1, H2, and H3 above.</p>	<p>None necessary.</p>

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	is necessary to protect this section of the Santa Clara River.		
H5	<p>Given the impacts of chloride exceedances, and the 26 reported chloride violations, the transition to UV disinfection must be completed as soon as possible. Several aquatic organisms have a low tolerance or sensitivity toward chloride, which puts them at risk for chloride toxicity. Therefore, high concentrations of chloride in freshwater ecosystems can significantly harm aquatic organisms by affecting their reproduction, limiting plant growth, and decreasing the biodiversity of these habitats. High concentrations of chloride and its dissolved chloride ions also increase corrosivity of water. Additionally, chloride in concentrations higher than 250 mg/L affects the quality and human confidence in drinking water by making it taste salty. Given that Reach 5 of the Santa Clara River is used for agricultural, domestic, and municipal water supply, non-contact water recreation, water contact recreation, and warm freshwater habitat, all impacts of chloride exceedances must be considered.</p> <p>We appreciate that the Facility is transitioning from using chlorination as the final disinfection process to using UV disinfection to address the 26 chloride violations reported on CIWQS. We request an update on the implementation of this transition, and we encourage the Regional Board and the Permittee to complete this transition as soon as possible.</p>	<p>SCVSD started operating the UV disinfection system at the Saugus WRP on July 20, 2021, and has been optimizing operation of the UV disinfection system since that time. SCVSD is also on track to complete the microfiltration and reverse osmosis facilities at the Valencia WRP by the TSO expiration date on December 31, 2022.</p> <p>As background, the current NPDES permit, Order No. R4-2015-0072, for the Saugus WRP includes a 3-month rolling average final chloride effluent limitation of 100 mg/L and a daily maximum final chloride effluent limitation of 230 mg/L. A compliance schedule was included in this permit that established a 12-month rolling average chloride interim limitation equal to the sum of the chloride concentration in the potable water supply plus 88 mg/L not to exceed a daily maximum of 230 mg/L, and a schedule of milestones the discharger must meet to achieve compliance with the 3-month rolling average final effluent limitation of 100 mg/L. The 12-month rolling average interim effluent limitation expired on July 1, 2019. SCVSD was unable to meet this deadline due to litigation-related issues and requested a Time Schedule Order (TSO). The Los Angeles Water Board issued TSO No. R4-</p>	None necessary.

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		<p>2019-0056 on May 9, 2019, extending the expiration date of the 12-month rolling average interim effluent limitation for chloride until January 31, 2021. SCVSD also requested two extensions of the TSO due to COVID 19-related delays. The Los Angeles Water Board issued two TSO amendments in response. The first amendment extended the expiration date of the interim effluent limitation for chloride until January 31, 2022. The second amendment extended the expiration date of the interim effluent limitation to December 31, 2022.</p> <p>Excursions above the final chloride effluent limitations in the permit are not considered violations as long as the Discharger is complying with the interim effluent limitations and other requirements set forth in the TSO, which it has been.</p>	
H6	<p>We commend the Regional Board for utilizing numeric toxicity effluent limits, and support the updates made to the Tentative Permit, in alignment with the Statewide Toxicity Provisions.</p> <p>In humans, the short-term effects of acute toxicity (e.g., eye irritation, allergic reactions, skin burns, rashes, itchiness, vomiting, etc.) are seen almost immediately, whereas chronic symptoms (e.g., cancers; loss of hearing, eyesight, or memory; tumors; muscle pain; organ failure; etc.) build up and develop over a longer period of time due to continued exposure. With animal species, the effects of acute</p>	Comment noted.	None necessary.

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	<p>toxicity are significant when 50% of the test population die from a one-time or limited exposure to high concentrations of the pollutant (LC 50). The effects of chronic toxicity are due to long-term exposure to these pollutants that negatively impair growth, reproduction/offspring viability, biological functions, weight fluctuations, and survival. Toxicity testing identifies discharges with toxic effluent that have cumulative negative impacts on aquatic life, even though individual pollutants may meet requirements for the limited list of California Toxic Rule (CTR) priority pollutants. Toxicity limits are, therefore, an important safety net in discharge permits that serves to integrate the actual biological impacts of numerous pollutants.</p> <p>We commend the Regional Board for including numeric toxicity effluent limits using the Test for Significant Toxicity (TST) even within the previous permit. The TST is based on sound science and provides a clear toxicity objective. We further support the removal of accelerated monitoring in this Tentative Permit and the inclusion of requirements to more quickly initiate a Toxicity Reduction Evaluation (TRE), as required by the Statewide Toxicity Provisions. Incorporation of these Statewide Toxicity Provisions into the Tentative Permit effectively complements the chemical approach addressing individual CTR priority pollutants and is critical to protect the water quality and ecological integrity of the Santa Clara River.</p> <p>To better understand the toxicity impacts of the Facility, given the 10 violations during the previous</p>		

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	<p>permit term reported in the compliance summary of the Tentative Permit, we compiled all of the chronic toxicity data reported for 2021 through CIWQS. In 2021 alone, 9 samples failed the TST, including two failing samples as late as July 2021. Although the toxicity event in July 2021 did not result in a violation of the permit terms, it does indicate a continued trend of chronic toxicity at the Facility. The complete 2021 chronic toxicity data set is shown in Attachment 2. The new requirement to more quickly initiate a TRE will help to identify and remediate the cause of any future chronic or acute toxic event.</p>		