

Response to Comments

Water Replenishment District (WRD)

Albert Robles Center for Water Recycling & Environmental Learning – Advanced Water Treatment Facility (ARC-AWTF)
Tentative Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit (Tentative)
NPDES No. CA0064645

Comment Letter dated September 11, 2023 from the Water Replenishment District of Southern California (WRD)

#	Comments	Response	Action Taken
A1	Table 2 of the Order. For consistency with the water produced at the ARC-AWTF and other references in the permit consider changing effluent description listed in the table to “Advanced Treated <u>Recycled Water</u> ” for discharge points 001, 001A, and 001B.	Los Angeles Water Board agrees.	Revisions have been made to the Tentative Order.
A2	Table 3 of the Order. WRD would prefer to avoid the holidays and hope the agency can understand the associated logistical challenges of implementing a new permit in December. We request the agency consider changing the effective date to January 8, 2024. This will allow time to update our sampling plans, coordinate with our contract laboratory, and train personnel responsible for operating the ARC-AWTF.	Los Angeles Water Board agrees.	Revisions have been made to the Tentative Order.

#	Comments	Response	Action Taken
A3	<p>Table 6, section 5.1.1. of the Order and Section 4.5 of the Fact Sheet. Consider adding the underlined text after "...except as a result of external ambient temperature <u>and/or when high temperature is recorded in the influent delivered to ARC-AWTF</u>". This provides clarification for the influent we anticipate receiving from LACSD.</p>	<p>The Los Angeles Water Board agrees that the temperature of the influent to the ARC-AWTF is beyond WRD's control because the Los Angeles County Sanitation Districts owns and operates the San Jose Creek Water Reclamation Plant and the sewer collection system. Since WRD has little control over the temperature of the influent, language has been added to the interim effluent and receiving water limitations in section 4.1.2. and 5.1.1 of the Tentative Order and section 4.5 of the Fact Sheet. However, the final effluent limitation for temperature remains the same and is not changed in response to this comment because the final effluent limitation does not become immediately effective. As explained in Section 6.2.7 of the Fact Sheet, the Tentative Order includes a compliance schedule to allow WRD time to work with LACSD to develop strategies to meet the final effluent limitation.</p>	<p>Revisions were made to the Tentative Order.</p>

#	Comments	Response	Action Taken
A4	<p>Section 4.3 of the Order. WRD understands this is standard permit language and as we discussed with regional board staff the core mission of our agency is to maximize groundwater recharge, which is primarily accomplished through the use of recycled water as available including Los Angeles County Sanitation Districts (LACSD) and stormwater capture managed by the Los Angeles County Public Works (LACPW). WRD anticipates this requirement will not require much effort and our planned submittal will be commensurate with maximizing the use of recycling at the ARC-AWTF.</p>	<p>The Recycling Specifications in Section 4.3 of the Tentative Order are not meant to require an extensive report. The purpose of this requirement is to encourage dischargers to investigate the feasibility of recycling more water and to determine strategies to use water more efficiently. The ARC-AWTF is a water recycling facility, but the Los Angeles Water Board expects WRD to limit discharges to the concrete-lined portion of the San Gabriel River and to continue working with other agencies to develop additional strategies to recycle/reuse additional water.</p>	<p>None necessary.</p>

#	Comments	Response	Action Taken
A5	<p>Section 6.1.c of the Order. WRD requests the agency remove this condition or provide additional clarification as to why a storm or flood condition applies to the ARC-AWTF. It appears to be more applicable to a water reclamation plant (WRP).</p>	<p>The commenter appears to be referencing Section 6.1.2.c of the Tentative Order, which requires adequate protection against damage resulting from overflow, washout or inundation in certain circumstances. The ARC-AWTF conveys several types of liquid streams including tertiary-treated effluent from the San Jose Creek WRP, advanced-treated recycled water, and waste products that could potentially be released if a storm inundates the facility that renders any systems inoperable. In addition, chemicals are stored on-site that could be released to the environment if the facility becomes inundated with water. This requirement is in place to prevent any accidental release of pollutants to the receiving water, and it is applicable to the ARC-AWTF because the facility stores chemicals and conveys liquid streams that contain pollutants that may impact the beneficial uses of the receiving water if released during a flood.</p>	None necessary.

#	Comments	Response	Action Taken
A6	<p>Section 6.3.2.c section 10.4.8 of MRP, and section 6.2.2.d of Fact Sheet of the Order. Products used to clean the filtration system meet health-based standards for drinking water application and are certified by NSF. WRD requests the removal of this condition based on the supporting information enclosed in this response to the RWQCB.</p>	<p>Section 6.3.2.c of the Tentative Order requires a UF Filtrate Special Study. Since the UF filtrate contains added chemicals and the effluent monitoring location is upstream of where the UF filtrate combines with the advanced treated recycled water before being discharged to the receiving water, this special study is required to ensure the concentrations of pollutants in the UF filtrate do not cause an exceedance of the water quality objectives in the receiving water. As provided in Attachment C of the Discharger's comment letter, there are several pollutants added to the UF to control biofouling. This special study should focus on the chemicals added during the UF process to determine the concentrations in the UF filtrate and how these pollutant streams may impact the quality of the wastes discharged. This study is also anticipated to be short and should only need to include a couple sampling events to ensure the UF filtrate has minimal impact on the quality of the discharge. This section has been modified to clarify the requirements of this study.</p>	<p>Revisions were made to the Tentative Order.</p>

#	Comments	Response	Action Taken
A7	<p>Section 6.3.4.c. of the Order. Remove this condition from the permit as the facility is not a critical infrastructure and can be turned off at any time by WRD. The facility also has sufficient existing safeguards in the operation plan that are regularly tested and are inspected periodically by the RWQCB.</p>	<p>The influent and effluent to the ARC-AWTF can be controlled because the Facility takes in tertiary-treated effluent only when needed. The requirement for a backup power supply is meant to prevent spills due to uncontrolled flows throughout the treatment process. Since the ARC-AWTF can be turned off at any time (particularly during emergencies), the risk of untreated or partially treated waste being discharged to a surface water is minimal. The Los Angeles Water Board agrees to remove this requirement from the Tentative Order. Corresponding changes to section 10.1.3 of the MRP and 6.2.4. of the Fact Sheet of the Tentative Order were also made.</p>	<p>Revision has been made to the Tentative Order.</p>
A8	<p>Section 6.3.4.d. of the Order. Remove any reference specified as or related to “standby power generators”.</p>	<p>The Los Angeles Water Board agrees to remove reference to “standby power generators” for the same reasons discussed in our response to Comment A7.</p>	<p>Revisions have been made to the Tentative Order.</p>

#	Comments	Response	Action Taken
A9	<p>Table 7 of the Order. Change completion date to submit and begin implementation of the PPP to February 15, 2024. WRD appreciates the agency adopting the proposed compliance schedule and milestone dates in our letter submitted to the agency on June 6, 2023. However, a note was included in the letter indicating the proposed dates were contingent upon a board meeting being held on September 28, 2023. WRD is simply requesting an extra month to account for the board meeting being held one month later on October 19, 2023.</p>	<p>Los Angeles Water Board agrees to change the completion date to submit and begin implementation of the PPP. Since consideration of this permit was postponed from the October 19, 2023, Board meeting to the November 16, 2023, Board meeting, the due date for the PPP has been shifted to March 15, 2024. This change will not impact the overall timeline for completion of the Compliance Schedule.</p>	<p>Revisions have been made to the Tentative Order.</p>

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A10	<p>Section 3.1 of the MRP. WRD appreciates the agency decision to not require duplicate sampling, which as you know samples are already being collected, analyzed, reported for the same discharge points by LACSD. However, to avoid any confusion we request the agency replace the second sentence with “Monitoring requirements listed below <u>are already included in the</u> existing requirements under Waste Discharge Requirements Order No. R4-2021-0131 (NPDES Permit No. CA0053911) for the SJC WRP”. WRD believes the agency intent is for us to not collect any additional samples already being collected and reported by LACSD at monitoring locations INF-001, RSW-001, RSW-002, RSW-003, RSW-004, and RSW-004D.</p>	<p>This section already indicates that the influent monitoring requirements may duplicate existing requirements under the San Jose Creek WRP NPDES permit No. CA0053911, and further indicates that effluent data reported under NPDES permit No. CA0053911 will be accepted as equivalent to the influent monitoring requirements for the ARC-AWTF. This means WRD is not required to analyze influent data if LACSD has already analyzed the pollutant/parameter in the San Jose Creek WRP effluent; however, WRD is still required to report the results.</p>	None necessary.

A11	<p>Table E-3: WRD understands after discussing this item with agency staff there is very little flexibility regarding the testing of certain constituents such as the priority pollutants listed in Appendix A of 40 CFR part 136. However, there is flexibility in the minimum sampling frequency when supported by historical data gathered for the ARC-AWTF. WRD is providing for agency consideration an updated table with supporting details to replace Table E-3. If adopted, the minimum sampling frequency may need to be updated in other areas of the permit including Table 10 (pages F-67 to F-69). We hope agency staff in reviewing the proposed reductions can appreciate the amount of treatment that occurs and process redundancy that naturally addresses most constituents and based on the historical analytical record there is sufficient support to remove many constituents and grant significant reductions in sampling frequency. WRD has successfully demonstrated that the treated effluent poses no harm to the environment and has consistently demonstrated compliance with the agency's Basin Plan. Furthermore, the permit already recognizes the highly treated water from our facility is placed directly into a pipeline containing tertiary</p>	<p>The Los Angeles Water Board reviewed the proposed effluent monitoring frequency reductions and have made some monitoring reductions in response to this comment where appropriate. Although the Los Angeles County Sanitation Districts (LACSD) monitors the effluent from the San Jose Creek WRP, WRD processes the effluent from the San Jose Creek WRP prior to discharge. Since the ARC-AWTF further treats the San Jose Creek WRP effluent, the quality of the discharge from the ARC-AWTF is not captured through LACSD's effluent monitoring at the San Jose Creek WRP. As a result, eliminating effluent monitoring for the ARC-AWTF is not appropriate for most pollutants to ensure water quality objectives continue to be met. Please see our responses to the proposed effluent monitoring reductions for each pollutant below:</p> <ol style="list-style-type: none"> Total Coliform: To evaluate whether total coliform bacteria meet the effluent limits in Table 4 of the Tentative Order, daily monitoring is necessary. In addition, the Discharger already monitors total coliform daily in their recycled water permit (Order No. R4-2018-0129). The Discharger may comply with this NPDES monitoring requirement by submitting the data already collected for Order No. R4-2018-0129. <i>E. coli</i>: Since compliance with water quality objectives for indicator bacteria is determined through effluent limitations for total coliform, the monitoring frequency for <i>E. coli</i> has been reduced from weekly to monthly. Footnote "f" of Table E-3 was also revised since the monitoring frequency for <i>E. coli</i> has been reduced. Biochemical Oxygen Demand (BOD₅20°C), Cobalt Thiocyanate Active Substances (CTAS), Methylene Blue 	<p>Revisions were made to the Tentative Order.</p>
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	<p>treated water, which is subsequently discharged to the San Gabriel River. The actual discharge point is already sampled for the same constituents by LACSD. The redundant sampling does not appear to be needed anymore now that we have multiple years of operational data for the ARC-AWTF.</p> <p>Data collection where historical results indicate there is very little risk to the environment results is wasted public funds that could be better utilized by our agency elsewhere including basin cleanup, regional groundwater monitoring, identifying potentially responsible parties (PRPs), and providing support for disadvantaged communities (DACs). If the agency disagrees with our assessment, we respectfully request a followup meeting with the Executive Officer.</p>	<p>Active Substances (MBAS), Oil and Grease (O&G) Total Suspended Solids (TSS), and Settleable Solids: The Basin Plan has narrative water quality objectives (WQOs) for these parameters. The Los Angeles Water Board understands that the ARC-AWTF is designed and operated to provide advanced treatment, but regular monitoring is required to verify compliance with the WQOs for these parameters. Considering the type of facility and that the low concentrations of these parameters observed in the effluent confirm that the narrative water quality objectives have been met during the previous permit cycle, Los Angeles Water Board agrees to reduce the monitoring frequency of BOD₅20°C, CTAS, MBAS, TSS, and settleable solids to “semiannually.” There are no changes to the O&G monitoring frequency to ensure the Discharger continues to meet the narrative water quality objective in the Basin Plan for oil and grease.</p> <p>4. Dissolved Oxygen (DO), Total Dissolved Solids (TDS), sulfate, chloride, boron, ammonia, nitrate, nitrite, nitrate+nitrite, organic nitrogen, Total Kjeldahl Nitrogen (TKN), total nitrogen, total phosphorus, orthophosphate: The Basin Plan includes narrative and numeric WQOs for these parameters. The Los Angeles Water Board understands that the ARC-AWTF is designed and operated to provide advanced treatment, but regular monitoring of these pollutants/parameters is required to verify compliance with the narrative and numeric WQOs for these pollutants/parameters. Considering the type of facility and that the low concentrations (or in the case of DO, high concentrations) of these parameters observed in the effluent confirm that the narrative and numeric water quality objectives have been met during the previous permit cycle,</p>	
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		<p>the Los Angeles Water Board agrees to reduce the monitoring frequency for these pollutants/parameters to “quarterly.”</p> <p>5. Chronic Toxicity: The discharge has reasonable potential to cause or contribute to the exceedance of the water quality objectives for chronic aquatic toxicity because there were failed chronic aquatic toxicity tests during the previous permit term. In addition, since the Facility is authorized to discharge at a rate of 5.0 MGD or greater, monthly chronic aquatic toxicity monitoring is required consistent with Section III.C.4.b.i(A) of the <i>State Policy for Water Quality Control: Toxicity Provisions</i>.</p> <p>6. Radioactivity: Monitoring for radioactive substances is required to ensure the discharge does not exceed the narrative prohibition on radioactive substances in the Basin Plan, therefore reducing monitoring frequencies of these pollutants from semiannual to annual is inappropriate at this time.</p> <p>7. Chromium III, chromium VI, total trihalomethanes, and remaining USEPA priority pollutants excluding asbestos: These parameters are priority pollutants and sufficient monitoring data are needed to perform a robust reasonable potential analysis to ensure that beneficial uses of the receiving water are protected. Therefore, less frequent monitoring for these pollutants is inappropriate at this time.</p> <p>8. Fluoride and iron: The Los Angeles Water Board agrees to reduce the monitoring frequency for fluoride and iron to annually since the concentrations of these two pollutants in</p>	
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		<p>the effluent were below the concentrations expected to impact beneficial uses.</p> <p>9. Copper and Lead: The San Gabriel River is impaired for copper and lead; therefore, there is a TMDL for these parameters. During the 2017 permit cycle, these pollutants were detected in the ARC-AWTF discharge at concentrations higher than the water quality objectives, which indicates that the discharge has reasonable potential to cause or contribute to an exceedance of the corresponding water quality objectives. Since the receiving water is impaired for copper and lead, and the discharge has reasonable potential to cause or contribute to an exceedance of the water quality objectives in the receiving water during the 2017 permit cycle, less frequent monitoring for these pollutants is inappropriate at this time.</p> <p>10. Total Chromium: Total chromium analysis is required to calculate the chromium III concentration, which is a priority pollutant and needs to be monitored semiannually as explained above in item 7. Therefore, less frequent monitoring for this pollutant is inappropriate at this time.</p> <p>9. Mercury, selenium, and thallium: These pollutants were detected in the ARC-AWTF discharge at concentrations exceeding the water quality objectives during the 2017 permit cycle, which indicates that there is reasonable potential for the discharge to cause or contribute to exceedances of the corresponding water quality objectives for these pollutants. The Tentative Order establishes new effluent limitations for these pollutants, thus, less frequent monitoring for these pollutants is inappropriate at this time.</p> <p>10. Methyl Tert-Butyl Ether (MTBE): MTBE was used most prevalently in the past as a gasoline additive and has</p>	
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		<p>since been banned in California for that use; however, MTBE continues to be a concern in groundwater and has a primary maximum contaminant level (MCL). Since MTBE has not been detected in effluent during the past permit cycle and the Discharger will continue monitoring for MTBE through the WDRs/WRRs (Order No. R4-2018-0129) for indirect potable reuse for this facility, the Los Angeles Water Board agrees to remove effluent monitoring for this pollutant in the Tentative NPDES permit.</p> <p>Chlorpyrifos and diazinon: Both chlorpyrifos and diazinon are pesticides that have been banned in the United States and were not detected in the influent to or the effluent from the ARC-AWTF during the past permit cycle. The Los Angeles County Sanitation Districts also manages a pretreatment program to ensure pollutants such as these two pollutants do not cause interference or pass through at the San Jose Creek WRP, thereby also ensuring these pollutants do not cause toxicity in the influent to the ARC-AWTF. The Discharger is also required to conduct routine toxicity testing on the effluent from the ARC-AWTF to monitor for any impacts from pollutants such as pesticides in the receiving water. Therefore, the Los Angeles Water Board agrees to remove the monitoring requirements for these two compounds in the effluent of ARC-AWTF.</p> <p>11. Per- and Poly-fluoroalkyl substances (PFAS): The new PFAS monitoring requirement is consistent with USEPA's PFAS action plan. In addition, the Discharger already monitors PFAS in compliance with their recycled water permit (Order No. R4-2018-0129). The Discharger may comply with this NPDES monitoring requirement by</p>	
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#	Comments	Response	Action Taken
		<p>submitting the data already collected for Order No. R4-2018-0129.</p> <p>12. Total hardness (CaCO₃): The water quality objectives for metals are dependent on hardness and pH. Effluent hardness is needed to evaluate the water quality objectives for metals if upstream receiving water hardness data are unavailable. Due to variable flow management upstream throughout the year, there may not be flow in the San Gabriel River at the upstream monitoring location. If no upstream receiving water hardness data is available, the effluent data may be used since most of water that makes up the San Gabriel River in these reaches consists of treatment plant effluent. Therefore, minimum of semiannual monitoring of effluent hardness is necessary.</p>	

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A12	<p>Section 8.1 of the MRP. WRD appreciates the agency's decision to not require duplicate sampling, which as you know samples are already being collected, analyzed, reported for the same discharge points by LACSD. However, to avoid any confusion we request the agency replace the first sentence with "Monitoring requirements listed below <u>are already included in</u> existing requirements under Waste Discharge Requirements Order No. R4-2021-0131 (NPDES Permit No. CA0053911) for the SJC WRP <u>and Whittier Narrow WRP's Order No. Order R4-2021-0096</u>". WRD believes the agency intent is for us to not collect any additional samples already being collected and reported by LACSD at monitoring locations INF-001, RSW-001, RSW-002, RSW-003, RSW-004, and RSW-004D.</p>	<p>This section already indicates that the influent monitoring requirements may duplicate existing requirements under the San Jose Creek WRP NPDES permit No. CA0053911, and further indicates that effluent data reported under NPDES permit No. CA0053911 will be accepted as equivalent to the influent monitoring requirements for the ARC-AWTF. Since the Whittier Narrows NPDES permit was not referenced here, it was added for clarity.</p>	<p>Revisions were made to the Tentative Order.</p>

A13	<p>Attachment E, Section 8.1. The timing of NPDES permit renewal cycles are not the same as ARC NPDES permit renewal schedule. Since the goal is to ensure that the same monitoring requirements are in place for all three permits, WRD suggests removing the reference of "Order No." and adopting the NPDES permit number instead to avoid confusion. The suggested statement is included below: Monitoring requirements listed below may duplicate the existing requirements under Waste Discharge Requirements under NPDES Permit No. CA0053911 for the SJC WRP. ARC-AWTF's water monitoring stations RSW-002, RSW-003, and RSW-004 are identical to the SJC WRP's receiving water monitoring stations RSW-006 (R12), RSW-007 (R13), and RSW-005 (R2), respectively. ARC-AWTF's water monitoring station RSW-001 is also the same receiving water monitoring station for the WN WRP's RSW-002 (RA). To avoid duplication of sampling and monitoring activities, the receiving water monitoring activities for ARC-AWTF are not required if the activities performed under SJC WRP's NPDES Permit No. CA0053911 and Whittier Narrows WRP's NPDES Permit No. CA0053716 satisfy the</p>	<p>Los Angeles Water Board agrees with the suggested revisions.</p>	<p>Revisions were made to the Tentative Order.</p>
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#	Comments	Response	Action Taken
	requirements of this Order. The Permittee shall ensure that the receiving water monitoring required by this Order is completed and reported in the monitoring reports submitted in compliance with this Order. whether conducted by the Permittee or the Joint Outfall System.		

A14	<p>Attachment E, Table E-5 and E-6, pages E-27-E-34. WRD requests the agency revisit the listed parameters and minimum sampling frequency for potential inconsistencies with Order No. R4-2021-0131 (SJC WRP) and Order No. Order R4-2021-0096 (WN WRP) issued to LACSD. WRD believes the agency's intent is to not require us to collect any samples beyond those required for EFF-001 and as required in the permit we will be referencing compliance data already submitted by LACSD. This will help to avoid any confusion and duplicate sampling already performed and reported by LACSD. The list of concern is summarized below:</p>		<p>Chronic toxicity: The most sensitive species for the ARC-AWTF effluent is <i>Pimephales promelas</i> based on the most recent species sensitivity screenings conducted. To evaluate the impact the ARC-AWTF effluent has on the aquatic toxicity of the receiving water, the species used for chronic toxicity testing in effluent and receiving water must be consistent. Invertebrates and vertebrates have different sensitivities to pollutants, so if a pollutant at a certain concentration is toxic to <i>Ceriodaphnia dubia</i>, it does not confirm the same sample would also be toxic to <i>Pimephales promelas</i>. Therefore, the species for chronic toxicity test in Table E-5 and E-6 is retained.</p> <p>Total chromium: Since there is no approved method to analyze chromium III, total chromium is required to be analyzed to calculate the chromium III concentrations and therefore the monitoring frequency for total chromium needs to be consistent with that of chromium III.</p> <p>Mercury: The ARC-AWTF discharge has reasonable potential to cause or contribute to the exceedance of mercury WQO, therefore frequent monitoring of mercury is needed in both the effluent and receiving water.</p> <p>The descriptions in Table E-5 and Table E-6 of the Tentative Order for the remaining priority pollutants already exclude PCBs since PCBs are identified earlier in the table with an annual monitoring frequency. No change is necessary.</p>	None necessary.	
	Parameter	Table			Issue
	Chronic toxicity <i>Pimephales promelas</i> Survival and Growth endpoints	E-5			SJC 2021 permit states <i>Ceriodaphnia</i> as the species to test for chronic tox. Suggest removing reference to specific species.
	Total Chromium	E-5			Not required under SJC 2021 permit
Mercury	E-5	Does not match with SJC 2021 permit requirement (listed as semiannual under priority pollutant list but quarterly for ARC)			

#	Comments	Response	Action Taken						
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Total Chromium	E-6	Not required under WN 2021 permit							
A15	<p data-bbox="275 662 858 883">Attachment E, Section 8.1.3, page E-34. Both SJC and WN 021 permits state 48 hours instead of 72 hours. WRD relies on LACSD to collect receiving water samples and suggests having consistent requirements across all three permits.</p>	<p data-bbox="879 737 1726 802">The Los Angeles Water Board agrees with the suggested revision.</p>	<p data-bbox="1747 662 1896 883">The revision was made to the Tentative Order.</p>						
A16	<p data-bbox="275 922 858 1175">Attachment E, Section 9.2, page E-35. Currently, there is no volumetric reporting tab for submittal under ARC WDR GeoTracker account. WRD suggests RWQCB to facilitate the compliance process by reviewing the account setting accordingly.</p>	<p data-bbox="879 906 1726 1192">The Los Angeles Water Board will work with WRD to ensure they are able to properly report the volumetric data for the Facility. More detailed instructions for annual volumetric reporting were provided in section 10.4.6 of the MRP of this Tentative Order and at the State Water Board's Volumetric Annual Report web page (www.waterboards.ca.gov/water_issues/programs/recycled_water/volumetric_annual_reporting.html).</p>	<p data-bbox="1747 1013 1896 1078">No necessary.</p>						

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A17	Attachment F, section 4.3.4, page F-45. The tentative order did not include Attachment H. Please delete the reference if Attachment H is no longer applicable for this order.	Los Angeles Water Board agrees. There is no Attachment H, so reference to the attachment was removed.	Revisions were made to the Tentative Order.