

## ATTACHMENT F

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION  
320 West 4<sup>th</sup> Street, Suite 200, Los Angeles**

### FACT SHEET

**WASTE DISCHARGE REQUIREMENTS  
FOR  
CITY OF LOS ANGELES  
(LOS ANGELES-GLENDALE WATER RECLAMATION PLANT)**

NPDES No. CA0053953

Public Notice No. : **R4-2006-05510-009**

#### FACILITY ADDRESS

Los Angeles-Glendale Water Reclamation Plant  
4600 Colorado Boulevard  
Los Angeles, California

Contact: Mr. Hiddo Netto

Title: Plant Manager

Telephone: (310) 864-9292

#### FACILITY MAILING ADDRESS

City of Los Angeles  
433 S. Spring Street, 4<sup>th</sup> Floor  
Los Angeles, CA 90013

Contact Person: **Rita L. Robinson****Enrique C. Zaldivar**

Title: Director, Bureau of Sanitation

Phone: (213) 473-7999

### **I. Public Participation**

1. The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is considering the issuance of waste discharge requirements (WDRs) that will serve as a National Pollutant Discharge Elimination System (NPDES) permit for the above-referenced facility. As an initial step in the WDR process, the Regional Board staff has developed tentative WDRs. The Regional Board encourages public participation in the WDR adoption process.

#### **A. Public Comment Period**

The staff determinations are tentative. Interested persons are invited to submit written comments only on the **changes contained within the** tentative WDRs, **MRP, and Fact Sheet** for the City of Los Angeles (the City or Discharger), Los Angeles-Glendale Water Reclamation Plant (LAG WRP). **The added text is underlined and the deleted text is in strikethrough.**

Comments should be submitted either in person or by mail to:

Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013  
**ATTN: Raul Medina**

determined that there is a reasonable potential that the discharge will cause toxicity in the receiving water and, consistent with SIP section 4, the Order contains a narrative effluent limitation for Chronic Toxicity. The circumstances warranting a numeric Chronic Toxicity effluent limitation were reviewed by the State Board in SWRCB/OCC Files A-1496 & A-1496(a) [Los Coyotes/Long Beach Petitions]. On September 16, 2003, the State Board adopted Order No. WQO 2003-0012, deferring the numeric chronic toxicity effluent limitation issue until a subsequent phase of the SIP is adopted, and replaced the numeric chronic toxicity effluent limitation with a narrative effluent limitation for the time being.

2. Nitrate plus nitrite as nitrogen and other constituents with non-CTR based ~~limits~~limitations – RPA was conducted for Nitrate plus Nitrite as Nitrogen and other constituents (Table R2 of the accompanying Fact Sheet) using the Discharger's effluent data from their self monitoring reports. The effluent data for Non-priority pollutants is summarized in Table D2 of the accompanying Fact Sheet. The TSD RPA procedure compares the effluent data with the Basin Plan water quality objectives (WQOs) and other applicable criteria, and uses statistics to predict a receiving water concentration. Based on information submitted to the Regional Board by the Discharger, and using the TSD RPA procedure, the Regional Board has determined that there is a reasonable potential that the discharge will cause or contribute to an exceedance of the applicable criteria for: Nitrate plus Nitrite as Nitrogen, nitrite nitrogen, ~~tetrachloroethylene~~ and bis(2-ethylhexyl)phthalate. During the settlement negotiations preceding the January 25, 2010 settlement agreement, a new reasonable potential analysis was conducted in February 2009, using available data that was representative of the treated effluent following the NDN upgrade and the ammonia add-back process change (Table D1r of the accompanying Fact Sheet). In response to comments received, the dataset was expanded to include data from 2009; spreadsheets in this Fact Sheet were revised; and an updated reasonable potential analysis was conducted on March 1, 2010, yielding similar results. Therefore, the Order contains numeric effluent limitations for Nitrate plus Nitrite as Nitrogen, nitrate nitrogen, ~~tetrachloroethylene~~, and bis(2-ethylhexyl)phthalate, as reasonable potential continues to exist for the discharge to cause or contribute to excursions above criteria for these constituents.

- B. Using the method described in the SIP, the Regional Board has conducted RPA for priority pollutants using the discharger's effluent data contained in Table D1 and receiving water data contained in Table D3. The RPA compares the effluent data with water quality objectives in the Basin Plan and CTR.

1. **Reasonable Potential Determination** - The RPA (per the SIP) involves identifying the observed maximum pollutant concentration



contribute to excursions of water quality standards. However, if the constituent had a limit in the previous permit, and if none of the Antibacksliding exceptions apply, then the limit will be retained. A narrative limit to comply with all water quality objectives is provided in *Standard Provisions* for the priority pollutants, which have no available numeric criteria.

2. **RPA Data** - The RPA conducted in 2006 was based on effluent monitoring data for January 1998 through August 2005. During the settlement negotiations preceding the January 25, 2010 settlement agreement, an updated RPA was conducted in February 2009, using available data that was representative of the treated effluent following the NDN upgrade and ammonia add-back process change. Effluent monitoring data was collected between June 1, 2007 and December 31, 2008 (see Table D1r). In response to comments received, the dataset was expanded to include data from 2009; spreadsheets in this Fact Sheet were revised; and an updated reasonable potential analysis was conducted on March 1, 2010, yielding similar results. Effluent limitations for cyanide, tetrachloroethylene, benzo(a)anthracene, chrysene, and N-Nitrosodi-n-Propylamine are removed in this Order for constituents that no longer have reasonable potential, as required by the State Board Order WQ 2003-0009. Table R1 of theis Fact Sheet summarizes the RPA, lists the constituents, and where available, the lowest, adjusted WQO, the MEC, the "Reasonable Potential" result, and the limitslimitations from the previous permit.

**Metals Water Quality Objective** - For metals, the lowest applicable WQO was expressed as total recoverable, and where applicable, adjusted for hardness. A spreadsheet (Table R3) was used to calculate the total recoverable CTR criteria. Hardness values from samples collected in the receiving water upstream of the discharge point are averaged and used to determine the appropriate CTR WQO for those hardness-dependent metals. The average hardness values at (R2) were used to determine the appropriate CTR WQO for hardness-dependent metals. In the determination of criteria for the metals TMDL constituents, the hardness was set at the hardness determined by the TMDL. Individual hardness values greater than 400 mg/L were capped at 400 prior to calculating the average hardness of 261 mg/L. This is consistent with the preamble to the CTR, contained in Federal Register Section E.f. *Hardness* (p.31692), 40 CFR Part 131.

A reopener provision is included in this Order that allows the permit to be reopened to allow the inclusion of new numeric limitations for any constituent that exhibits reasonable potential to cause or contribute to exceedance of applicable water quality objectives.

The Basin Plan lists temperature requirements for the receiving waters. Based on the requirements of the Basin Plan and a white paper developed by Regional Water Board staff entitled *Temperature and Dissolved Oxygen Impacts on Biota in Tidal Estuaries and Enclosed Bays in the Los Angeles Region*, a maximum effluent temperature limitation of 86 °F is included in the Order. The white paper evaluated the optimum temperatures for steelhead, topsmelt, ghost shrimp, brown rock crab, jackknife clam, and blue mussel. The new temperature effluent limitation is reflective of new information available that indicates that the 100°F temperature is not protective of aquatic organisms. A survey was completed for several kinds of fish and the 86°F temperature was found to be protective. It is impracticable to use a 7-day average or a 30-day average limitation for temperature, because it is not as protective as of beneficial uses as a daily maximum limitation is. A daily maximum limit is necessary to protect aquatic life and is consistent with the fishable/swimmable goals of the CWA.

Section I.1.D. of the WDR contains the following effluent limitation for temperature:

"The effluent temperature shall not exceed 86°F, except as a result of external ambient temperature."

Section IV.5.E. of the WDR explains how compliance with the receiving water temperature limitation will be determined.

C. Toxicity.

Ambient monitoring data indicates that the background concentration in the lower Los Angeles River is toxic to aquatic organisms, and therefore exceeds water quality standards. Final effluent water quality data, contained in the Discharger's monitoring reports, also shows that chronic toxicity in the effluent has exceeded 1TUc (EPA WQO) several times. Therefore, pursuant to the TSD, reasonable potential exists for toxicity. As such, the permit should contain a numeric effluent limitation for toxicity.

The following support the inclusion of toxicity numeric effluent limitations for chronic toxicity:

- a. 40 CFR 122.2 (Definition of Effluent Limitation);
- b. 40 CFR 122.44(d)(v) – ~~limits~~limitations on whole effluent toxicity are necessary when chemical-specific ~~limits~~limitations are not sufficient to attain and maintain applicable numeric or narrative water quality standards;
- c. 40 CFR 122.44(d)(vi)(A) – where a State has not developed a water quality criterion for a specific pollutant that is present in the effluent and has reasonable potential, the permitting authority can establish effluent ~~limits~~limitations using numeric water quality criterion;