Heal the Bay

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February 8, 2010

Ms. Rebecca E. Christmann
Unit Lead, Municipal Permitting Unit (NPDES)
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

Re: Comments on AMENDMENT OF WASTE DISCHARGE REQUIREMENTS AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT – CITY OF OXNARD, OXNARD WASTEWATER TREATMENT PLANT (NPDES NO. CA0054097, CI NO. 2022)

Dear Ms. Rebecca E. Christmann:

On behalf of Heal the Bay, we submit the following comments on the Regional Water Quality Control Board ("Regional Board") Amendment of Waste Discharge Requirements ("Amendment") and National Pollutant Discharge Elimination System ("NPDES") Permit for Oxnard Wastewater Treatment Plant in the City of Oxnard (NPDES No. CA0054097, CI No. 2022). We appreciate the opportunity to provide these comments.

We would first like to commend the City of Oxnard for their efforts to develop the Groundwater Enhancement and Treatment Program. The City of Oxnard's efforts to recycle water are a vital component of establishing sustainable water resources for California's future. We strongly support local and regional water agencies that are moving toward clean, abundant, local water for California by performing water recycling. These sources of supply are drought-proof, reliable, minimize our carbon footprint and can be sustained over the long-term.

Despite these benefits, we are concerned with one aspect of the Amendment as currently written. The Amendment bases permit limits off of inappropriate flow rates. Each mass loading effluent limitation in the Amendment includes two values. One is the effluent limit based on the plant design flow rate of the treatment plant (Page 11 footnote 5), which is the maximum outflow possible for the plant. The other value applies when 6.25 MGD of water is diverted from the plant for advanced water treatment. As mentioned in the permit, 6.25 MGD is the maximum amount of water that can be diverted. In reality, the plant most likely will not consistently redirect this maximal amount and outfall flows will fluctuate. Hence, we do not understand why these values were used to calculate effluent limits. Instead, due to the fact that discharges from the treatment plant are likely to fluctuate, the effluent limitations should vary based on the real flow of the plant rather than the maximum design flow. To base these limits on maximum flow instead of real flow provides that higher concentrations may be discharged during low flows, which would not be a protective approach. Hence, Staff should revise the Amendment to base the mass loading effluent limits off of the actual flow coming out of the outfall. Staff mentioned that revisions will be made to the Amendment that may address this concern. Will these revisions be open for public comment?

Again, we commend the City of Oxnard for developing a project to recycle water in order to secure reliable water supply amidst California's ongoing water crisis. However, we feel that the issue discussed above must be addressed. If you have any questions or would like to discuss any of these comments, please feel free to contact us at (310) 451-1500.

Sincerely,

W. Susie Santilena
Water Quality Scientist

Kirsten James
Water Quality Director