**RESPONSE TO COMMENTS**
**CITY OF THOUSAND OAKS**
**HILL CANYON TREATMENT PLANT (Hill Canyon TP)**
**TENTATIVE ORDER NO. R4-2026-XXXX**
**NPDES NO. CA0056294**

**Comment Letter Email dated April 8, 2026, from the City of Thousand Oaks (Discharger)**

| No. | Comment | Response | Action Taken |
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| 1 | WDRs Section 4.4.1, Table 4 - Cyanide Effluent Limits The City requests retaining the cyanide Maximum Daily Effluent Limits (MDELs) of 8.5 µg/L and 0.99 lbs/day, contained in the 2019 Order because the Fact Sheet calculation in the 2026 Tentative Order supports the older limit. No explanation is provided for the new 8.1 µg/L and 0.95 lbs/day MDELs. | The Los Angeles Water Board agrees to revise the cyanide MDELs in Table 4 to coincide with the cyanide calculations provided in Section 4.3.5.b of the Fact Sheet, which reflect the results for the expanded dataset spanning from July 1, 2019, to November 30, 2025. The 8.1 µg/L and 0.95 lbs/day cyanide MDELs, which were calculated using a smaller dataset, spanning January 1, 2020, to July 31, 2024, will be replaced with the 8.5 µg/L and 0.99 lbs/day cyanide MDELs. The 2026 Revised Tentative Order now reflects the corrected MDELs for cyanide, consistent with the values discussed in the Fact Sheet. | Revised the cyanide MDELs in Table 4 (page 8) of the WDRs and Tables F-9 (page F-56) and F-10 (page F-66) of the Fact Sheet. |
| 2a | WDRs Section 4.4.1, Table 4 - Selenium Effluent Limits<br>The City requests removing the selenium 3 µg/L Average Monthly Effluent Limit (AMEL) and the 5 µg/L MDEL because based on data from July 2019 to July 2025, there is no reasonable potential for the effluent to exceed the selenium criteria. The City's letter included the following graph of the effluent selenium concentrations. | The State Water Resources Control Board's (State Water Board) Policy for Implementation of Toxic Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California ("State Implementation Policy" or SIP) establishes the procedures for determining when priority pollutants, like selenium, require water quality based effluent limitations (WQBELs). This analysis is often referred to as a "reasonable potential analysis." The reasonable potential analysis has three tiers. | None necessary. |

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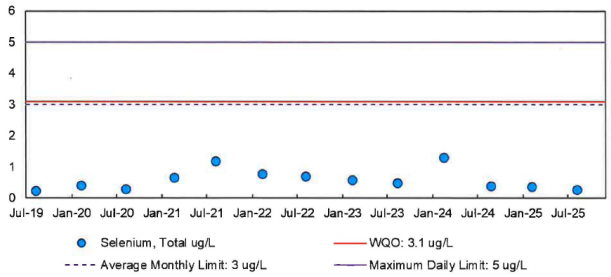
| |  | Under the first tier, reasonable potential exists when the maximum effluent concentration (MEC) exceeds the California Toxics Rule (CTR) water quality objective (WQO, or "C"), i.e., when MEC>C. In the second tier, reasonable potential exists when the receiving water (also referred to as the ambient background concentration, or "B") exceeds the WQO and the effluent discharges any quantity of the pollutant, thereby contributing to the exceedance (i.e., when B>C). In the third tier, other information can be used to determine if the discharge has reasonable potential. While the Facility does not exhibit reasonable potential under Tier 1, it does exhibit reasonable potential under Tier 2. This is because the maximum receiving water concentration of 4.4 µg/L exceeds the 3.1 µg/L WQO and selenium was present in the effluent, as documented in Table F-8 of the Fact Sheet. Consistent with Section 1.3, Steps 5 and 6 of the State Implementation Policy, the effluent therefore contributes to an exceedance of the selenium WQO and requires effluent limitations. The following graph of the selenium receiving water concentrations demonstrates that the upstream receiving water exceeded the 3.1 µg/L selenium WQO twice during the review period of July 2019 to November 2025. | |

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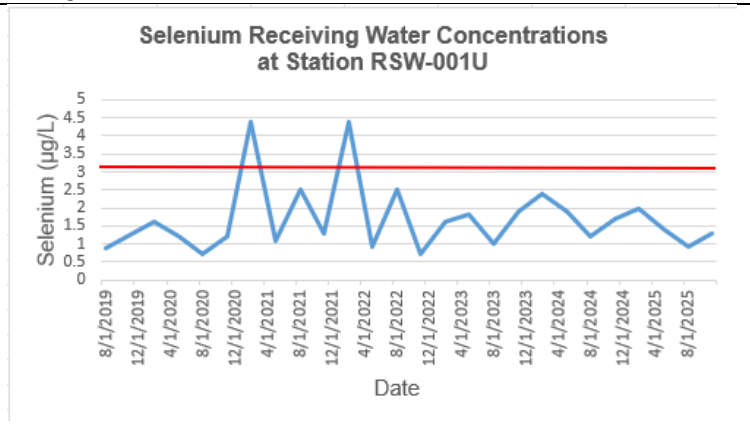
| | |  | |
| 2b | <u>Monitoring and Reporting Program – Table E-3.</u> The City requests reducing the frequency of selenium effluent monitoring, from monthly to semi-annually, after removing the selenium effluent limit. | The frequency of monitoring will remain as monthly, since the selenium effluent limitations are retained for reasons explained in response 2a (see above). | None necessary. |
| 3a | <u>WDRs Section 6.3.2.d – Temperature Fluctuation Study Requirement</u><br>The City requests removal of the requirement to submit, within 120 days after effective date of the Order, a workplan for a Temperature Fluctuation Study because: The permit already includes numeric effluent limitations for temperature and the Fact Sheet does not include any justification or indication that the discharges from the Hill Canyon TP are impacting beneficial uses or that the included numeric effluent limitations for temperature are insufficient to meet the water quality | The Los Angeles Water Board declines the City's request to remove the temperature fluctuation study because information gathered from this study will quantify the diurnal temperature change in the upstream and downstream receiving water stations and correlate the relationships between the Hill Canyon TP's discharge, the downstream temperature, and/or other factors.<br>The purpose and justification for the Temperature Fluctuation Study is stated in Section 6.2.2.d of the 2026 Fact Sheet, as follows: "The Temperature Fluctuation Study is required to investigate the impact the temperature of the effluent has on the natural receiving water temperature. Although the | Modified the language in Section 6.3.2.d of WDRs and the Fact Sheet to include continuous monitoring. |

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| | objectives and protect beneficial uses, particularly in a waterbody such as the North Fork Arroyo Conejo where the Hill Canyon TP effluent makes up ~95% of the flow.<br>The City acknowledged that the Fact Sheet provided the need to evaluate if additional requirements are necessary to meet the following portion of the temperature objective, as a rationale for including the temperature study:<br>*For waters designated WARM, water temperature shall not be altered by more than 5 °F above the natural temperature.* | effluent has been able to meet the 80°F water quality objective in the Basin Plan, historical data indicate that the effluent may be causing a temperature difference of more than 5°F between the upstream and downstream monitoring locations. Since the water quality objective for temperature in the Basin Plan requires that the discharge does not cause the temperature of the natural receiving water to be altered by more than 5°F, **the results from this study will be used to determine whether a potential revision of the temperature effluent limitation or other discharge requirements are necessary to ensure that the discharge does not cause the natural temperature of the receiving water to be altered by more than 5°F**. (emphasis added) The Temperature Fluctuation Study will at a minimum include the collection of flow and temperature measurements in the effluent and receiving water upstream and downstream of the Facility. The monitoring frequency and duration shall be adequate to assess seasonal and diurnal effects of the effluent on temperature in the receiving water for at least one year."<br><br>As explained in the Fact Sheet, the Basin Plan requires that the water temperature in water bodies with a WARM beneficial use "shall not be altered by more than 5 °F above the natural temperature" (Basin Plan, Chapter 3, p. 3-45). The Los Angeles Water Board commonly refers to this water quality objective as the "delta 5 objective." | |

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| | | The receiving waters for this discharge are designated with a WARM beneficial use and are therefore subject to the delta 5 objective for temperature. As acknowledged in the City's comment letter, the Fact Sheet cites the delta 5 objective as part of its rationale for the Temperature Fluctuation Study. This is because Hill Canyon TP's compliance with the temperature effluent limitation of 80 °F may not be sufficient to ensure compliance with the delta 5 objective, particularly in winter months when the natural receiving water temperature may be lower than the documented range of 69°F to 73 °F. Prior iterations of Hill Canyon TP's NPDES permit included receiving water limitations for temperature to address the delta 5 objective. However, the Tentative Permit removes all receiving water limitations to address the U.S. Supreme Court's decision in *City and County of San Francisco, California v. Environmental Protection Agency,* 145 S.Ct. 704 (2025).<br><br>In lieu of receiving water limitations, the Los Angeles Water Board evaluated whether additional permit requirements or changes to the existing effluent limitation (e.g., seasonal effluent limitations for temperature) are needed to ensure that the discharge does not cause or contribute to an excursion of the delta 5 objective—i.e., whether the discharge has reasonable potential to cause or contribute to an exceedance of the delta 5 objective. At this time, however, there is insufficient information to determine reasonable potential | |

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| | | because monthly discrete grab temperature samples are insufficient to ascertain the range of diurnal fluctuations in the receiving water or whether a delta 5 temperature change in the downstream receiving water was attributed to the discharge. Thus, the Temperature Fluctuation Study results, including the continuous temperature and flow readings that will be compiled, will provide essential data to conduct future reasonable potential analysis.<br><br>The Los Angeles Water Board has revised the WDRs and Fact Sheet to clarify that the Temperature Fluctuation Study will include continuous flow and temperature monitoring data as follows:<br><br>"The Temperature Fluctuation Study is required to investigate the impact the temperature of the effluent has on the natural receiving water temperature. Although the effluent has been able to meet the 80°F water quality objective in the Basin Plan, historical data indicate that the effluent may be causing a temperature difference of more than 5°F between the upstream and downstream monitoring locations. Since the water quality objective for temperature in the Basin Plan requires that the discharge does not cause the temperature of the natural receiving water to be altered by more than 5°F, the results from this study will be used to determine whether a potential revision of the temperature effluent limitation or other discharge requirements are necessary to ensure that the | |

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| | | discharge does not cause the natural temperature of the receiving water to be altered by more than 5°F. The Temperature Fluctuation Study will at a minimum include the collection of continuous flow and temperature measurements in the effluent and receiving water upstream and downstream of the Facility, collected as concurrently as possible. The monitoring frequency and duration shall be adequate to assess seasonal and diurnal effects of the effluent on temperature in the receiving water for at least one year." | |
| 3b | WDRs Section 6.3.2.e – pH Fluctuation Study Requirement<br>The City requests removal of the requirement to submit, within 120 days after effective date of the Order, a workplan for a pH Fluctuation Study because:<br>The permit already includes numeric effluent limitations for pH and<br>the Fact Sheet does not include any justification or indication that the discharges from the Hill Canyon TP are impacting beneficial uses or that the included numeric effluent limitations for pH are insufficient to meet the water quality objectives and protect beneficial uses, particularly in a waterbody such as the North Fork Arroyo Conejo where the Hill Canyon TP effluent makes up ~95% of the flow.<br>The City acknowledged the Fact Sheet provided as rationale for including the pH | The Los Angeles Water Board declines the City's request to remove the pH fluctuation study because information gathered will quantify the diurnal pH change in the upstream and downstream receiving water stations and correlate if there is a relationship between the Hill Canyon TP's discharge, the downstream pH, and/or other factors. The purpose and justification of the pH Fluctuation Study is stated in Section 6.2.2.e of the 2026 Fact Sheet, as follows:<br>"The pH Fluctuation Study is required to investigate the impact the pH of the effluent has on the receiving water pH. Although the effluent has been able to meet the 6.5-8.5 pH water quality objective in the Basin Plan, historic data indicate that the effluent may be causing a pH difference of more than 0.5 units between the upstream and downstream monitoring location. Since the water quality objective for pH in the Basin Plan for this receiving water also requires | Modified the language in Section 6.3.2.e of WDRs and the Fact Sheet to include continuous monitoring. |

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| | study, the need to evaluate if additional requirements are necessary to meet the following portion of the pH objective:<br>*Ambient pH levels shall not be changed more than 0. 5 units from natural conditions as a result of waste discharge.*<br>The City referenced Section 4.3.4.b.i of the Fact Sheet states that "the Los Angeles Water Board does not have sufficient ambient data (specifically the extent of diurnal pH fluctuations and flow regime variations of the receiving water) to determine the impact of the discharge on the pH of the receiving water, the RPA is inconclusive and this Order requires the discharger to investigate how the effluent discharge impacts the pH in the downstream receiving water," but added the following:<br>HillCanyon TP continually tracks influent and effluent pH using meters that are equipped with high and low level alarms. Effluent pH monitoring results indicate pH levels are consistently within the range of 6.9 to 7.2 and, therefore, do not fluctuate. Hill Canyon TP processes include flow equalization that allow fairly consistent flow rates to the North Fork Arroyo Conejo. Because the Hill Canyon TP effluent accounts for ~ 95% of the flow in the North Fork, it follows that there is no significant | that the discharge does not change the pH by more than 0.5 units from natural conditions**, the results from this study will be used to determine whether a potential revision of the pH effluent limitation or other discharge requirements are necessary to ensure that the discharge does not cause the natural pH of the receiving water to be altered by more than 0.5** (emphasis added)." The pH Fluctuation Study will at a minimum include the collection of flow and pH measurements in the effluent and receiving water upstream and downstream of the Facility. The monitoring frequency and duration shall be adequate to assess seasonal and diurnal effects of the effluent on pH in the receiving water for at least one year."<br><br>As explained in the Fact Sheet, the Basin Plan requires that "[a]mbient pH levels shall not be changed more than 0.5 units from natural conditions as a result of waste discharge" (Basin Plan, Chapter 3, p. 3-40).<br><br>Prior iterations of Hill Canyon TP's NPDES permit included receiving water limitations for pH to address the 0.5 unit change objective. However, the Tentative Permit removes all receiving water limitations to address the U.S. Supreme Court's decision in *City and County of San Francisco, California v. Environmental Protection Agency,* 145 S.Ct. 704 (2025). In lieu of receiving water limitations, the Los Angeles Water Board evaluated whether additional permit requirements or changes | |

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| | "diurnal" variation in pH consistent with the values seen in the effluent. | to the existing effluent limitation (e.g., effluent limitations for pH) are needed to ensure that the discharge does not cause or contribute to a change of pH of more than 0.5 units—i.e., whether the discharge has reasonable potential to cause or contribute to an exceedance of the 0.5 unit change objective. At this time, the Los Angeles Water Board does not have sufficient information to make this determination. As stated in response to Comment 2a above, a reasonable potential analysis is not based solely on effluent data, and the Los Angeles Water Board considers both effluent and receiving water data when conducting reasonable potential analyses. Although Hill Canyon TP continuously tracks influent and effluent pH levels, it does not continuously track the receiving water pH levels. Instead, the City gathers one discrete pH receiving water measurement per month for the upstream and downstream receiving water stations. Since the receiving water pH is only measured once per month, there is not enough data to fully confirm the absence of diurnal fluctuations or to distinguish whether observed changes are caused by the discharge or by natural factors.<br><br>Furthermore, the City commented that effluent pH is stable and does not fluctuate, largely due to the Hill Canyon TP's flow equalization and the effluent dominant flow in the North Fork. It should be affirmed that current operational practices at Hill Canyon TP are expected to maintain steady pH levels in both effluent and receiving water, | |

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| | | minimizing the likelihood of significant diurnal pH changes. The pH Fluctuation Study is essential for verifying these expectations and to determine compliance with the water quality objective for pH.<br><br>Thus, this study will provide a more comprehensive understanding of pH behavior in the receiving water, help clarify the natural conditions versus any impact from the effluent, and support a future reasonable potential analysis. The Los Angeles Water Board revised the WDRs and Fact Sheet to clarify that the pH Fluctuation Study will include continuous flow and pH measurements in the effluent and receiving water upstream and downstream of the Facility, collected as concurrently as possible. | |
| 4 | WDRs Section 4.3 Recycling Specifications<br>The City requests removing the Recycled Water Feasibility Investigation in Section 4.3.1 and the Volumetric Reporting Requirement in Section 4.3.2 because Camrosa Water District, not the City, manages recycled water operations, based on agreement between the two agencies from 2013. | The Los Angeles Water Board acknowledges that the Discharger does not manage recycled water operations for their discharges, but declines the City's request to remove the volumetric reporting requirement. Although the Camrosa Water District will report the amount of effluent that was recycled, Camrosa Water District cannot satisfy the requirement to report influent and effluent produced at the Hill Canyon TP on the City's behalf. The Water Quality Control Policy for Recycled Water (Recycled Water Policy), as amended in 2018, requires wastewater dischargers (including dischargers that do not produce any recycled water) to annually report monthly volumes of influent, wastewater produced, and effluent, along with treatment level and discharge type, as | None necessary. |

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| | | described in Section 9.3 of the Monitoring and Reporting Program (MRP). As specified in the Frequently Asked Questions (FAQs) regarding the volumetric annual reporting of wastewater and recycled water in the Recycled Water Policy, the Fact Sheet clarifies that the requirements apply to permittees covered by NPDES permits, WDRs and WRRs. It further states that "[t]he reporting requirements apply to dischargers that: (a) have facility design flow of more than 20,000 gallons per day that treat wastewater or recycled water from sources that contain domestic waste, in whole or in part; and (b) are not considered an Onsite Wastewater Treatment System (OWTS) per Water Code section 13290." (State Water Board FAQ: Volumetric Annual Reporting, last updated April 17, 2026.) Dischargers are additionally required to annually report recycled water use by volume and category of reuse.<br><br>The Los Angeles Water Board also declines the City's request to remove the Recycled Water Feasibility Investigation requirement because data generated by the annual volumetric report and the feasibility study will assist the State Water Board in tracking progress towards the current recycled water goals in the Recycled Water Policy and the Water Resilience Portfolio in response to Executive Order N-10-19 (2020) and California's Water Supply Strategy: Adapting to a Hotter, Drier Future (2022); evaluating the potential for increased | |

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| | | recycled water use; and assisting with statewide water supply planning efforts.<br><br>Additionally, the recycled water feasibility investigation, required in section 4.3.1 of the WDRs, will provide valuable information for utilizing available water sources for beneficial reuse. Moreover, compliance with the above requirements are not expected to be burdensome to the Discharger because this information is readily available at the Facility and already tracked as part of the Discharger's operation and annual summary monitoring requirements. Additionally, nothing in the volumetric reporting requirements is intended to change the Discharger's and the Camrosa Water District's water recycling obligations on the 2013 Agreement.<br><br>Therefore, the Recycling Specifications in Section 4.3 of the WDRs, including Sections 4.3.1 and 4.3.2, as well as monitoring and reporting requirements provided in the MRP sections 9.3.4, 10.5.7 and 10.5.10 will remain. | |
| 5 | <u>WDR Section 6.3.6.a.ii – Spill Notifications</u><br>The City requests modifying spill notification requirements by extending notification time to 5 hours and changing specific agency notifications to "other interested parties upon request." | California Water Code section 13271 (a)(1) requires notification by a person as soon as that person has knowledge of the discharge or deposit of any hazardous substance or sewage, in or on any waters of the state. The two-hour notification requirement included in the MRP is standard language for Publicly Owned Treatment Works (POTWs) to quantify spills "as soon as possible" to protect human health by minimizing exposure to | Modified language to Order section 6.3.6.a.ii |

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| | | pathogens contained in untreated wastewater. The 2-hour notification requirement in Section 6.3.6.a.ii is also consistent with the spill notification requirements in section 1.1. of Attachment E1 of the Statewide General Order for Sanitary Sewer Systems (Order WQ 2022-0103-DWQ; WDID 4SSO10449), which the City is enrolled in. Thus, the 2-hour notification time for spill notification requirements will remain.<br><br>While the Los Angeles Water Board declines to revise the 2-hour notification, the Los Angeles Water Board agrees to modify the language requiring the Discharger to notify the South Coast Air Quality Management District (AQMD), cities within the jurisdiction of the spill, and Heal the Bay. Individual agencies and persons would need to contact the City to request being placed on the City's interested person's list for spill notifications. The agency specific notification requirements in section 6.3.6.a.ii is revised as follows:<br><br>"In addition, the Discharger shall notify other interested persons <u>who have requested notification</u> of any such sewage spill~~,including but not limited to the South Coast Air Quality Management District (AQMD), cities within the jurisdiction of the spill, and Heal the Bay, by maintaining an email list of those interested persons that have requested such notification~~." | |
| 6a | <u>Fact Sheet Section 3.5.8.a - Calleguas Creek Salts TMDL Discussion</u> | The Los Angeles Water Board does not agree that the Hill Canyon TP has been fully in compliance with its effluent limitations for salts since the | Add language to Fact Sheet section 3.5.8.a. |

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| | The City refers to the section of the Fact Sheet which lists a number of actions that had been included as potential implementation actions in the Salts TMDL and states that Hill Canyon did not implement any of the actions. The City comments that the language in this section implies that Hill Canyon did not take actions to comply with the Salts TMDL, while neglecting to include any discussion of the history of the permit limitations. The City claims that Hill Canyon has been in compliance with their salts permit limitations since the adoption of the 2014 NPDES permit and requests adding clarifying language that as a result of maintaining compliance, the City did not pursue implementation actions. | adoption of the 2014 NPDES permit. As documented in Table F-3 of the Fact Sheet, the Hill Canyon TP experienced an exceedance for sulfate on February 15, 2024. Nevertheless, Section 3.5.8 acknowledges the Facility is currently in compliance with its effluent limitations for salts, stating "The Hill Canyon TP is also currently meeting the effluent limitations for salts." The Los Angeles Water Board also agrees to revise the last paragraph in Section 3.5.8.a of the Fact Sheet as follows:<br><br>"The City of Thousand Oaks did not complete any of these projects <u>because it determined that the discharge could comply with the parameters associated with the Calleguas Creek Salts TMDL, based on existing data</u>. <u>Nevertheless, the City prepared and implemented a Pollution Prevention Plan (PPP) for chloride, implemented water conservation measures, and participates in the Calleguas Creek Stakeholder Watershed group meetings.</u> <u>The City also supported the North Pleasant Valley Desalter Project by co-funding its planning phase, conducted a feasibility study of using Conejo Valley groundwater basin as an alternative potable water supply in 2016, and performed a study that identified contribution of sodium hypochlorite and ferric chloride as sources of excess chloride concentration in effluent.</u> Hill Canyon TP is currently not connected to the ~~Brine Line or the~~ Calleguas Municipal Water District Regional Salinity Management Pipeline, which is owned | |

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| | | and operated by the Calleguas Municipal Water District under a separate order, NPDES permit No. CA006452. Although the application of Q as flow at the time of water quality measurement in the calculation of mass-based effluent limitation for salts might lower the salt limitations, Hill Canyon TP is expected to comply with their salts limitations in this Order."<br><br> | |
| 6b | Fact Sheet – mass-based salts limits<br>The City commented that the Fact Sheet neglects to discuss the fact that this Tentative Order includes lower salts limitations and Hill Canyon is still in compliance with the limitations. | The 2019 Order contained the standard footnote language for calculating mass-based limits using the design capacity of the POTW, expressed as million gallons per day, the concentration expressed in mg/L, and an 8.34 conversion factor.<br><br>However, the Calleguas Creek Watershed Salts TMDL specifies that the flow term Q represents the POTW flow at the time the water quality measurement is collected (refer to footnote d of Section 7-22 of the Basin Plan, pg. 7-272).<br><br>Therefore, for consistency with the Calleguas Creek Watershed Salts TMDL, the 2026 Tentative Order includes Q as flow at the time of water quality measurement.<br><br>Although the application of Q as flow at the time of the water quality measurement in the mass-based effluent limit calculation might lower the salts limitations, the City's effluent is projected to be in compliance with these new salt effluent limitations.<br><br>The Fact Sheet was revised to state that the application of different definition of Q may lower the | Add language to Fact Sheet section 3.5.8.a |

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| | | salts limits, and the Discharger is expected to be in compliance with the updated salts limit. | |
| 6c | Compliance History for Salts<br>The City requests that the Fact Sheet includes a complete and accurate history of the Salts TMDL limitations in Hill Canyon's permit and the compliance history. The City believed that there was no need to pursue any of the implementation actions outlined in the Salts TMDL since they were maintaining compliance with the salt limitations. | Although section 3.5.8 of the Fact Sheet is intended to provide background on the applicable TMDLs and to explain how the Salt TMDL waste load allocations have been implemented in the permit, the Los Angeles Water Board agrees to include a discussion of the City's efforts taken to comply with the salts limitations (See response to comment 6a).<br>Section 2.4 of the Fact Sheet includes a Compliance Summary for all constituents from July 1, 2019, through November 30, 2025. | Add language to Fact Sheet section 3.5.8.a. |
| 6d | Interim Limits for Salts<br>The City requests that the Fact Sheet include the fact that Hill Canyon was never provided with a compliance schedule for the Salt limitations because they were deemed to be meeting the limitations in every permit that included the Salts TMDL. Per the 2014 permit which was the first permit that incorporated the Salts TMDL: "However, interim limits based on the interim WLAs have not been incorporated into this NPDES Order because existing data indicates that the Facility can consistently meet the final WLAs for the aforementioned parameters. Therefore, no interim effluent limitations will be applied in this permit for TDS, chloride, | The interim effluent limits based on the interim wasteload allocations (interim WLAs) are not discussed in the 2026 Tentative Order because the interim WLAs expired on December 2, 2023, fifteen years after the effective date of the Calleguas Creek Salts TMDL.<br>The Los Angeles Water Board also notes that while a compliance schedule was not included for any of the salt parameters (TDS, chloride, or sulfate) in the 2014 or 2019 permits, the City was granted interim effluent limits for chloride, which were higher than the final effluent limitations, under Time Schedule Order (TSO) No. R4-2014-0065, adopted on May 8, 2014, and its Amendment TSO No. R4-2014-006-A01, administratively issued on January 30, 2015. The TSO was granted in consideration of changes in the City's potable water supply and the | None necessary. |

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| | or sulfate." (page 10). Similar language was included in the 2019 permit. | subsequent higher salt content of that water supply. | |
| 6e | On page F-7, the Fact Sheet discusses the Conejo Creek Diversion project through which the Camrosa Water District diverts water from Conejo Creek to be used for recycled water. The water diverted from Conejo Creek includes Hill Canyon effluent, but the water is not used as recycled water by the City of Thousand Oaks or Hill Canyon. Please revise this section to clarify that the Camrosa Water District, not the Hill Canyon TP reuses effluent through the Water Rights Permit and that the Camrosa Water District diverts the water from Conejo Creek, not the City of Thousand Oaks. | The Los Angeles Water Board agrees. The language was modified as follows:<br>The Discharger does not hold separate individual WDRs for water recycling. Instead, the ~~Hill Canyon TP~~Camrosa Water District reuses disinfected tertiary-treated water that was discharged from the Hill Canyon TP to North Fork Arroyo Conejo, through a separate Water Rights Permit No. 20952, issued by the State ~~of California's~~Water Board Division of Water Rights on February 6, 1998, to the City of Thousand Oaks. This Water Rights permit allows~~granted~~ the City of Thousand Oaks to provide water for delivery to the Camrosa Water District for subsequent use; allows Camrosa Water District ~~request~~ to divert water from Conejo Creek and after subsequent treatment, use it for irrigation purposes within the service areas of Camrosa Water District and Pleasant Valley County Water District (PVCWD); approves~~d~~ the use of 21.7 cubic feet per second (cfs), up to a maximum annual quantity of 15,683 acre-feet, of diverted water for irrigation use; and, specifies~~d~~ that 2.0 cfs must be left in the creek to account for channel losses and another 2 cfs must be left in the creek for maintenance and protection of fish and wildlife under Waste Water Change Petition WW-6. On May 18, 2012, the State Water Board's Division of Water Rights issued | Revised section 2.2 (page F-7) of the Fact Sheet to clarify that Camrosa Water District is the agency that diverts water for recycling purposes. |

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| | | Amended Permit for Diversion and Use of Water Permit 20952, allowing an additional 4 cfs, by direct diversion from January 1 through December 31, until December 31, 2025, as long as the flow in the creek is 6 ~~cubic feet per second~~ cfs or more (including the 2 ~~cubic feet per second~~ cfs dedicated to fish and wildlife). On May 28, 2013, the Discharger entered into the Agreement Between the City of Thousand Oaks and the Camrosa Water District for the Beneficial Use of Water Pursuant to State Water Resources Control Board Water Right Decision 1638 (Agreement). Some of the terms of Agreement include: a term of forty years beginning on the effective date of the agreement; the City of Thousand Oaks agrees to operate the city measurement station at its sole expense; Camrosa Water District agrees to operate and maintain the Camrosa Diversion. | |
| 7a | Monitoring Frequency for BOD, TSS, and Settleable solids<br>The City requests reducing the monitoring frequency from weekly to monthly for BOD, TSS, and Settleable solids. The City commented that the request is justified because the levels of these parameters are consistently below the effluent limits listed in Table 4 of the 2026 Tentative Order. | The limits for BOD and TSS are technology-based and reflect the minimum level of effluent quality attainable by secondary treatment. Weekly monitoring is required to ensure that the Facility is operating properly in compliance with the requirements of 40 CFR Part 133. Additionally, since receiving water requirements for the parameters have been removed from the Tentative Order in response to the decision in *City and County of San Francisco, California v. Environmental Protection Agency,* 145 S. Ct. 704 (2025), the weekly monitoring for BOD, TSS and settleable solids will provide information to evaluate | None necessary. |

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| | | whether or not the effluent will not have adverse effects on the receiving water. | |
| 7b | Influent Monitoring for Total Chromium, TKN, and Temperature.<br>In Table E-2, influent monitoring requirements have been added for TKN, Total Chromium, and Temperature. There are no effluent limits for these constituents indicating that there is no reasonable potential for effluent levels of these constituents to exceed water quality objectives. As such, monitoring in the effluent will provide adequate information regarding the presence of these constituents in discharges at levels of concern. Therefore, the City requests that influent monitoring requirements for TKN, Total Chromium, and temperature be removed. | The Los Angeles Water Board does not agree to remove the influent monitoring. The Clean Water Act requires monitoring to be sufficient to determine compliance with the relevant NPDES permit. (33 U.S.C. § 1342(a)(2); 40 C.F.R. § 122.44(i)(1).) Federal guidance recommends influent monitoring should be required when "characterization of the influent is needed to determine compliance with a permit condition." (NPDES Permit Writers' Manual, EPA-833-K-10-001, Sept. 2010, Chapter 8, p. 8-3.)<br><br>Here, influent monitoring for TKN, Total Chromium and Temperature are necessary to determine compliance with permit limitations and to provide information that may inform development of future permit requirements. TKN influent monitoring was added to quantify the total amount of nitrogen that is available in a sample, including both organic and inorganic nitrogen, in the raw sewage entering the POTW. By comparing the influent and effluent TKN results, staff can determine the efficiency of the nitrification and denitrification process. High levels of TKN may also produce harmful algal blooms in the receiving water. TKN monitoring will provide information to the Los Angeles Water Board on whether POTW is causing or contributing to conditions that promote harmful algal blooms (HABs) in the receiving water. Influent monitoring | None necessary. |

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| | | for total chromium is required so that the result for chromium III can be calculated by subtracting the amount of chromium VI from total chromium. Influent monitoring for temperature was added to compare the temperature of the wastewater entering the Hill Canyon TP with the temperature of the treated effluent leaving the POTW, to determine if the treatment process increases the water temperature. This information is necessary to evaluate reasonable potential for the discharge to change the temperature of the receiving water and to help determine the contribution of treatment processes, any increases in temperature to the effluent and eventually to the receiving water, which can be used to help determine compliance with the delta 5 objective. | |
| 7c | <u>Pesticide Monitoring</u><br>The effluent monitoring frequency is quarterly in Table E-3 for Diazinon, Chlordane, 4-4'DDD, 4-4' DDE, 4-4' DDT, or Dieldrin. However, these constituents are consistently below detection levels. Therefore, the City requests the monitoring frequency be changed to semi-annually. These constituents are only included as effluent limitations because they have TMDL wasteload allocations. The TMDL monitoring program recently modified the dry weather monitoring frequency for these constituents to semi-annual. Making this | The Los Angeles Water Board does not agree to reduce the monitoring frequencies for these organochlorine pesticides (OC Pesticides), including Chlordane, 4-4'DDD, 4-4' DDE, 4-4' DDT, or Dieldrin. These requirements are maintained to be consistent with the approved Revision (No. 4) of the Calleguas Creek Watershed Management Plan Quality Assurance Project Plan (QAPP) for Calleguas Creek Watershed TMDL Monitoring Program (CCWTMP). Although the CCWTMP dry-weather monitoring frequency was recently proposed for modification, Revision No. 6 of the CCWTMP QAPP dated December 2025, that proposal is still being reviewed and has not been approved by the Executive Officer. | None necessary. |

<table>
<tr><th>No.</th><th>Comment</th><th>Response</th><th>Action Taken</th></tr>
<tr><td></td><td>change will be consistent with the new TMDL monitoring program.</td><td>Revision 4 of the CCWTMP QAPP lists the following monitoring frequencies for OC Pesticides:<br><table><tr><th>Conejo</th><th>Sampling Frequency Per Year</th></tr><tr><td>10D_HILL</td><td>4 quarterly samples</td></tr><tr><td>9B_ADOLF</td><td>4 quarterly (dry-weather) samples<br>2 wet-weather samples</td></tr><tr><td>13_SB_HILL</td><td>4 quarterly (dry-weather) samples<br>2 wet-weather samples</td></tr><tr><td>9BD_GERRY</td><td>4 quarterly (dry-weather) samples<br>2 wet-weather samples</td></tr></table><br>Notably, Revision 6 of the CCWTMP QAPP proposed two wet-weather and two dry-weather pesticide sampling events per year for 9BD_GERRY and MO-THO/12D_THO, which are representative sampling locations for agricultural land use and urban discharges, respectively. While the monitoring results for OC Pesticides were reported as non-detect during this period, the method detection level (MDL) for the analytical test method is not sensitive enough to determine with certainty that these pesticides are not truly present at levels below the effluent limitations for these pesticides.<br><br>Chlorpyrifos and diazinon have WQBELs consistent with the assumptions and requirements of the Calleguas Creek Watershed Toxicity Total</td><td></td></tr>
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| | | Maximum Daily Load (Calleguas Creek Watershed Toxicity TMDL) in chapter 7-16 of the Basin Plan. Chlordane, 4-4'DDD, 4-4' DDE, 4-4' DDT, and Dieldrin have WQBELs consistent with the assumptions and requirements of the Calleguas Creek Watershed Organochlorine Pesticides, Polychlorinated Biphenyls, and Siltation TMDL (chapter 7-17 of the Basin Plan).<br><br>Therefore, continued quarterly monitoring for Chlordane, 4-4'DDD, 4-4' DDE, 4-4' DDT is included in the Tentative Order to determine if the Hill Canyon TP remains in compliance with the WQBELs for OC Pesticides.<br><br>The frequency of monitoring for organophosphorus Pesticides (OP Pesticides), including Diazinon and Chlorpyrifos, does not require a change because it is already listed as semiannually in Table E-3 of the MRP. Since the MDL and RL for these OP Pesticides are sufficiently sensitive, and the data was reported as non-detect, it is appropriate to monitor the effluent semiannually. | |
| 7d | <u>PFAS Monitoring</u><br>Table E-3 includes new quarterly monitoring requirements for PFAS. Based on previous monitoring, and discussions with the City's Pretreatment staff, there are no apparent industrial sources of PFAS and residential sources are not easily controlled. This new monitoring requirement will add approximately $2500/year (i.e., quarterly | Section 7.2 of the Fact Sheet states that the new quarterly PFAS monitoring requirement is consistent with the United States Environmental Protection Agency's (USEPA's) PFAS Action Plan. A memorandum dated April 28, 2022, from USEPA, addressed to EPA Regional Water Division Directors in Regions 1-10, recommends that POTWs with an approved pretreatment program conduct quarterly PFAS monitoring in | None necessary. |

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| | sampling equipment and analytical costs). While the City recognizes the importance of characterizing PFAS levels, the same information will be obtained through semi-annual monitoring. Therefore, the City requests that the monitoring frequency be changed from quarterly to semi-annually. | effluent, influent and biosolids. Since the Hill Canyon TP implements an approved pretreatment program, the 2026 Order incorporates the quarterly PFAS monitoring requirement, as recommended by USEPA. | |
| 7e | <u>Dissolved sulfide Monitoring</u><br>Tables E-3 and E-6 includes new requirements to monitor for dissolved sulfide in the effluent and receiving water. The rationale for including this monitoring is noted in Table F-11 stating:<br>*This receiving water limitation implemented the water quality objective for solid, suspended, or settleable materials in Chapter 3 of the Basin Plan. Sulfide forms under reducing (anaerobic) conditions, such* as *in sediments or oxygen-depleted water. Reasonable potential* is *inconclusive since there* is *no monitoring data to determine how dissolved sulfide or other constituents in the effluent are impacting the dissolved sulfide in the receiving water. New dissolved sulfide effluent and receiving water monitoring* is *therefore included in this Order to conduct future reasonable potential analyses.*<br>As stated, dissolved sulfide is associated with impacts from solid, suspended or settleable materials in the receiving water. Because the levels for total suspended and | Since the narrative receiving water requirement for dissolved sulfide was removed, dissolved sulfide data is needed to conduct future reasonable potential analysis and determine if degradation is taking place in the receiving water. Although the Hill Canyon TP has monitoring requirements for suspended solids and settleable solids, the results of those pollutants do not directly translate to a specific concentration of dissolved sulfide. Nevertheless, because dissolved sulfide does not have effluent limits, the Los Angeles Water Board proposes to reduce the monitoring frequency from monthly to quarterly for dissolved sulfide for both effluent and receiving water. | Changes made in the MRP Tables E-3 and E-6. |

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| | settleable solids in Hill Canyon TP effluent are consistently below MDL and effluent limits, there is no reasonable potential for the receiving waters to be impacted by their discharge and generate sulfide. Therefore, the City requests that the monitoring requirements for sulfide in effluent and receiving water be removed since the suspended and settleable solids analyses already provide the information needed. | | |
| 7f | <u>TCDD equivalents Monitoring</u><br>Tables E-2, E-3 and E-6 also include monitoring requirements for TCDD equivalents. TCDD equivalents have not been detected in influent, effluent or receiving waters. Therefore, the City requests that the monitoring requirement be removed or reduced to once per permit period. | 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD) is a priority pollutant and along with its equivalent dioxins and congeners form the basis for regulating this compound, so they need to be monitored at least semiannually, for pretreatment purposes. Therefore, the frequency of monitoring will not be reduced. | None necessary. |
| 7g | <u>Permethrin, bifenthrin, cyfluthrin Monitoring</u><br>In addition, Tables E-3 and E-6, include monitoring requirements for pyrethroids (permethrin, bifenthrin, cyfluthrin), However, these constituents are currently monitored in the Hill Canyon TP effluent and in the receiving water through the Calleguas Creek Watershed (CCW)TMDL monitoring program. The new permit monitoring requirements are redundant of this program. Based on data collected between 2009 - 2024, permethrin, bifenthrin and cyfluthrin are infrequently detected in the effluent | The Los Angeles Water Board declines the City's request to remove the pyrethroids monitoring requirements. As stated in section 7.2 of the Fact Sheet, the pyrethroid semiannual effluent monitoring requirement is required to determine whether the effluent from the Facility is a source of pyrethroids, given that the receiving water has been included on the recent 303(d) list. The Los Angeles Water Board acknowledges that Hill Canyon TP is conducting effluent and receiving water monitoring as part of the CCW TMDL monitoring program. Since the effluent monitoring location aligns with the monitoring location | Added Footnote o in MRP Table E-3. |

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| | (<5% of samples). Because they are rarely detected and monitoring is already occurring under the CCW TMDL monitoring program, the City requests that this monitoring requirement be removed. | designated under the Tentative, the City may submit the results of the semiannual CCWMP sampling for station 10D_HILL in lieu of duplicative effluent sampling. However, the receiving water monitoring location is more than 6 miles downstream from the discharge point and cannot be considered as immediately downstream for evaluating water quality impact of waste discharge from the Facility. Therefore, receiving water monitoring results collected through the CCW TMDL monitoring program cannot be used as a substitute for the required receiving water monitoring. | |
| 8 | <u>Cost of Monitoring</u><br>Overall, the cost associated with the monitoring requirements has increased substantially. In addition to the $2500/year noted above for the new PFAS monitoring requirements, Whole Effluent Toxicity (WET) testing is estimated to cost $1300/sample or ~$15,600/year based on monthly sampling. Additional monitoring required for the pH and Temperature fluctuation studies is estimated to cost $20,000 to $40,000. The City requests that the monitoring frequency for WET testing be reduced to quarterly. | Monitoring is required to determine compliance with the prescribed effluent limitations and the results are used to determine future reasonable potential analysis. The Los Angeles Water Board understands that monitoring costs can be significant and rise as a result of inflation and other external factors. Nonetheless, the monitoring program in the Tentative Order has been reasonably considered to ensure consistency with applicable State Plans and policies and is established to determine compliance with existing permit requirements, evaluate whether new or modified permit requirements are necessary, and to understand the discharge's impact to receiving waters.<br><br>The cost of Toxicity testing and PFAS sampling can vary depending on the contract laboratory. For instance, there is a laboratory within the Ventura | None necessary. |

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| | | County service area that quotes just $455 per sample to test PFAS. At roughly $1,820 per year, this option would represent an annual savings of $680 compared to the City's estimate.<br><br>Additionally, in an effort to streamline the monitoring program where appropriate, the Los Angeles Water Board decreased the frequency of effluent hardness testing from monthly to quarterly, representing an additional cost savings.<br><br>With respect to the frequency of WET testing, the frequency is consistent the State Policy for Water Quality Control: Toxicity Provisions, adopted by the State Water Board on December 1, 2020, and revised on October 5, 2021. Section III.C.4.b.i(A) (at page 21) specifies the following frequency of routine monitoring for chronic aquatic toxicity in for dischargers required to comply with numeric aquatic toxicity effluent limitations:<br><br>"For Non-storm water NPDES Dischargers authorized to discharge at a rate equal to or greater than 5.0 MGD, the frequency of Routine Monitoring shall be specified in the NPDES permit as follows:<br><br>'The discharger shall conduct at least one Chronic Aquatic Toxicity Test every Calendar Month during which there is expected to be at least 15 days of discharge. Initiation of the Routine Monitoring test shall be at a time that would allow any required MMEL Compliance Tests to be initiated within the same Calendar Month as the Routine Monitoring test.'" | |

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| | | Since the Hill Canyon TP is required to comply with an effluent limitation for chronic toxicity, is authorized to discharge more than 5 MGD, and discharges more than 15 days in a calendar month, it is required to conduct at least one effluent chronic toxicity test per calendar month. Therefore, the frequency of monitoring will not be revised. | |
| 9 | Section 7.14 -Date Correction<br>The City requests correcting the year referenced in the following section regarding Compliance with Calleguas Creek Watershed TMDL WLAs, on p. 31: "Beginning in 2026, the Discharger shall consult with the Los Angeles Water Board by February 15th of every year to discuss the current status of the Facility ... ". Because the permit will not be effective until 8/31/26 and the first full year of operation will end in August 2027, please revise to "Beginning in 2028." | The Los Angeles Water Board agrees. The language will be revised to "Beginning in 2027" because the February 15th consultation is supposed to evaluate data from the previous calendar year. | Change the year from 2026 to 2027 in section 7.14 (page 31) of the WDRs. |
| 10 | Update staff change<br>Table F-1 lists Clifford G. Finley as the Authorized Person to Sign and Submit Reports. He no longer works for the City. Please, change this to Tim Mooney, Plant Superintendent (currently also listed as Facility Contact in Table F-1 ). | The Los Angeles Water Board acknowledges the changes in staffing and will incorporate the changes into the Tentative. | Updated the name of the LRO in Table F-1 (page F-3) of the Fact Sheet. |
| 11 | Section 9.1.1 lists the goals of the Calleguas Creek TMDL monitoring program. The listed goals do not match the approved QAPP for that monitoring program. | The overall goals of monitoring through the CCWTMP may differ from what the goals of the NPDES permit. The goals listed in section 9.1.1. of the MRP are to determine any water quality | None necessary. |

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| | Please change the goals to the following to match the QAPP in both this section and the Fact Sheet:<br>o To assess progress towards TMDL numeric targets.<br>o To test for sediment toxicity at sediment monitoring stations.<br>o To identify causes of unknown toxicity.<br>o To generate additional land use runoff data to better understand pollutant sources and proportional contributions from various land use types.<br>o To monitor the effect of implementation actions by urban, POTW, and agricultural dischargers on in-stream water, sediment, and fish tissue quality, and watershed balances (salts).<br>To implement the program consistent with other regulatory actions within the CCW. | impacts from Hill Canyon TP's discharge on the receiving water and its beneficial uses, as they relate to the Hill Canyon TP individual NPDES permit. In contrast, the goals of the CCWTMP are those of the following stakeholder parties who are regulated under multiple NPDES and Non-NPDES Orders, which entered into a Memorandum of Agreement to pool monitoring resources:<br>• POTWs - Camrosa Water District, Camarillo Sanitary District, Ventura County Waterworks District No. 1, and the Cities of Simi Valley and Thousand Oaks;<br>• Urban Dischargers - Cities of Simi Valley, Thousand Oaks, Camarillo, Moorpark and Oxnard and the County of Ventura Public Works Agency;<br>• Agricultural Dischargers consisting of the entities represented by the Ventura County Agricultural Irrigated Lands Group (VCAILG) within the Calleguas Creek Watershed, a subdivision of the Farm Bureau of Ventura County; and<br>• Other dischargers consisting of U.S. Department of Navy and Caltrans.<br>Thus, the language in section 9.1.1. will remain unchanged. | |

* Staff initiated change: Los Angeles Water Board staff noticed a typographical error regarding the requirement in section 6.3.6.a of the Order that was not incorporated into the MRP. MRP section 10.5.13 is added as a reminder of the requirements detailed in section 6.3.6.a of the Order.