

APPENDIX I

- **Division of Drinking Water Correspondence**



August 30, 2024

SENT VIA EMAIL: [chau.tran@waterboards.ca.gov]

Chau Tran, P.E.
State Water Resource Control Board
Division of Drinking Water
500 North Central Ave., Suite 500
Gendale, CA 91203

Subject: System NO. 1910240, Response to the Division of Drinking Water Comment Letter for the Well V201 Technical Report

Dear Ms. Tran,

The Division of Drinking Water (DDW) provided an additional set of Comments on the Well V201 Technical Report on August 21, 2024. In the email, DDW requested further information and clarification from the second comment letter, dated February 22, 2024, regarding the submitted V201 Technical Report, dated December 22, 2022.

If DDW deems that these responses adequately address the comments, then SCVWA will incorporate the responses and submit finalized document ahead of a draft permit.

If you have any questions, please contact me at (661) 259-1635 or janderson@scvwa.org.

Sincerely,

A handwritten signature in blue ink that reads "Jenny Anderson".

Jenny Anderson
Water Quality Specialist
Santa Clarita Valley Water Agency

The following responses are prepared and submitted by Santa Clarita Valley Water Agency (SCVWA) in response to an emailed received in August 2024 from the Division of Drinking Water (DDW) on the Drinking Water Guideline 97-005 Documentation Report for Well V201 dated 22 December 2022 (Report).

Following DDW review of this response to comments and subsequent discussion, SCVWA anticipates the Report will be updated, and resubmitted to DDW. If you have any questions regarding the SCVWA responses to the DDW comments, please contact us.

The numbered DDW comments are listed below, with responses from SCVWA provided for each of the DDW comments. Table 6-9 will be incorporated into the 97-005 document once approved.

(Comment #8, previously #26c) Table 6-9, Proposed Surveillance Well Monitoring Program, should be updated to include the following information:

1. DDW Comment: Analytical methods and detection limits for reporting for all the listed monitoring parameters.

SCVWA Response: Enclosed are the analytical methods and detection limits for the listed parameters on Table 6-9.

2. DDW Comment: Please clarify if the monitoring parameter listed as “Hydrocarbon” for Wells V201 and V205 includes both total petroleum hydrocarbon (TPH) gasoline and diesel fractions. If not, please include both as monitoring parameters for Wells V201 and V205.

SCVWA Response: Table 6-9 has been updated to include both total petroleum hydrocarbon (TPH) gasoline and diesel fractions.

3. DDW Comment: For Wells V-201 and V-205: please add explosive compounds (e.g., HMX, RDX, and 2,4,6-TNT) to the list of monitoring parameters, with a monitoring frequency of annually. Please collect one set of samples for these explosive compounds, TPHg, TPHd, and fuel oxygenates and include a discussion of the results in the revised report (if any additional compounds were detected).

SCVWA Response: Table 6-9 has been updated to include annual monitoring for explosives HMX, RDX and 2,4,6-TNT to Wells 201 and 205. As part of the construction of the treatment facility for Well 201 and Well 205, each well is in the process of being rehabbed and unable to collect samples at this time. Samples will be collected during the start up for each well. If there are any positive detections, a summary of the results will be provided to DDW as a separate document. SCVWA may request a reduction in monitoring after two annual samples have been collected with non-detect results.

4. DDW Comment: For Library and Mall wells: Please add TPH gasoline and diesel fractions, and explosive compounds to the list of monitoring parameters, with monitoring frequencies of annually. Please also collect one set of samples for these parameters and include a discussion of the results in the revised report (if any additional parameters were detected).

SCVWA Response: Total Petroleum Hydrocarbons (TPH), Total Petroleum Hydrocarbons (gasoline fraction), Total Petroleum Hydrocarbons (diesel fraction), HMX, RDX, and 2,4,6-

TNT have been included in the annual frequency monitoring for the Library and Mall monitoring wells. SCVWA will collect the hydrocarbons and explosives discussed at the library and mall wells towards the end of September or early October. The laboratory report will be provided to DDW once available, and a summary will be included if there are any positive detections. SCVWA may request a reduction in monitoring after two annual samples have been collected with favorable, or non-detect results.

Table 6-9: Proposed Surveillance Well Monitoring Program

Well Name	Well Type	Screened Interval, feet bgs ^(c)	Parameter ^(a,b)								
			Water Level	General Mineral/General Physical	Inorganic ^(d)	Perchlorate	Radiological	VOCs ^(e)	SOC ^(f)	Hydrocarbons ^(g)	Explosives ^(h)
Well V-201	Supply	Multiple	No	Annual	Annual	Monthly	Annual	Quarterly	Annual	Quarterly	Annual
Well V-205	Supply	Multiple	No	Annual	Annual	Monthly	Annual	Quarterly	Annual	Quarterly	Annual
DW-1A	Monitoring	780 - 800	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual		
DW-1B	Monitoring	985 - 1005	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual		
DW-1C	Monitoring	1180 - 1200	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual		
Library A	Monitoring	662 - 642	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	Annual	Annual
Library B	Monitoring	722 - 742	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	Annual	Annual
Library C	Monitoring	832 - 852	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	Annual	Annual
Mall A	Monitoring	785 - 805	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	Annual	Annual
Mall B	Monitoring	885 - 905	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	Annual	Annual
Mall C	Monitoring	1070 - 1090	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	Annual	Annual

Notes:

- (a) SCVWA will propose reduced monitoring frequency for certain parameters.
- (b) Water quality parameters for each category are defined as per California Code Regulations, Title 22 requirements.
- (c) Feet bgs denotes feet below ground surface.
- (d) Excludes analysis for asbestos.
- (e) VOC denotes Volatile Organic Compounds.
- (f) SOC denotes Synthetic Organic Compounds.
- (g) Includes Total Petroleum Hydrocarbons (TPH), Total Petroleum Hydrocarbons (gasoline fraction) and Total Petroleum Hydrocarbons (diesel fraction)
- (h) Includes explosive compounds HMX, RDX, and 2,4,6-TNT.

Analysis Group	Method Description	Method Code	Prep Method	Analyte Description	CAS Number	RL	MDL	LOD	Units	LCS - Low	LCS - High	LCS - RPD %	MS - Low	MS - High	MS - RPD %	Surrogate Low	Surrogate High
Perchlorate	Perchlorate (LC/MS/MS)	331.0 PREC CA		Perchlorate	14797-73-0	1.00	0.0861		ug/L	80	120	20	80	120	20		
VOC	Volatile Organic Compounds (GC/MS)	524.2 Pres PREC		Dichlorodifluoromethane	75-71-8	0.500	0.0990		ug/L								
				Chloromethane (methyl chloride)	74-87-3	0.500	0.113		ug/L								
				Vinyl Chloride (VC)	75-01-4	0.300	0.0770		ug/L	70	130	20	70	130	20		
				Bromomethane (Methyl Bromide)	74-83-9	0.500	0.118		ug/L	70	130	20	70	130	20		
				Chloroethane	75-00-3	0.500	0.0780		ug/L								
				Trichlorofluoromethane (Freon 11)	75-69-4	0.500	0.183		ug/L	70	130	20	70	130	20		
				1,1-Dichloroethylene	75-35-4	0.500	0.110		ug/L	70	130	20	70	130	20		
				Bromoethane	74-96-4	0.500	0.182		ug/L	70	130	20	70	130	20		
				Trichlorotrifluoroethane	76-13-1	0.500	0.140		ug/L	70	130	20	70	130	20		
				Carbon disulfide	75-15-0	0.500	0.0850		ug/L	70	130	20	70	130	20		
				Dichloromethane	75-09-2	0.500	0.0740		ug/L	70	130	20	70	130	20		
				trans-1,2-Dichloroethylene	156-60-5	0.500	0.105		ug/L	70	130	20	70	130	20		
				Methyl-tert-butyl Ether (MTBE)	1634-04-4	0.500	0.0740		ug/L	70	130	20	70	130	20		
				1,1-Dichloroethane	75-34-3	0.500	0.133		ug/L	70	130	20	70	130	20		
				2-Butanone (MEK)	78-93-3	5.00	1.06		ug/L	70	130	20	70	130	20		
				Diisopropyl ether	108-20-3	3.00	0.107		ug/L	70	130	20	70	130	20		
				cis-1,2-Dichloroethylene	156-59-2	0.500	0.138		ug/L								
				2,2-Dichloropropane	594-20-7	0.500	0.154		ug/L	70	130	20	70	130	20		
				Bromochloromethane	74-97-5	0.500	0.177		ug/L	70	130	20	70	130	20		
				Chloroform (Trichloromethane)	67-66-3	0.500	0.113		ug/L								
				Tert-butyl ethyl ether	637-92-3	3.00	0.171		ug/L	70	130	20	70	130	20		
				1,1,1-Trichloroethane	71-55-6	0.500	0.0790		ug/L	70	130	20	70	130	20		
				1,2-Dichloroethane	107-06-2	0.500	0.119		ug/L	70	130	20	70	130	20		
				1,1-Dichloropropene	563-58-6	0.500	0.113		ug/L	70	130	20	70	130	20		
				Benzene	71-43-2	0.500	0.117		ug/L	70	130	20	70	130	20		
				Carbon tetrachloride	56-23-5	0.500	0.0870		ug/L	70	130	20	70	130	20		
				Tert-amyl methyl ether	994-05-8	3.00	0.112		ug/L	70	130	20	70	130	20		
				Trichloroethylene (TCE)	79-01-6	0.500	0.0970		ug/L	70	130	20	70	130	20		
				1,2-Dichloropropane	78-87-5	0.500	0.0710		ug/L	70	130	20	70	130	20		
				Dibromomethane	74-95-3	0.500	0.0990		ug/L								
				Bromodichloromethane	75-27-4	0.500	0.117		ug/L	70	130	20	70	130	20		
				cis-1,3-Dichloropropene	10061-01-5	0.500	0.108		ug/L	70	130	20	70	130	20		
				trans-1,3-Dichloropropene	10061-02-6	0.500	0.135		ug/L	70	130	20	70	130	20		
				Toluene	108-88-3	0.500	0.0570		ug/L	70	130	20	70	130	20		
				1,1,2-Trichloroethane	79-00-5	0.500	0.0750		ug/L	70	130	20	70	130	20		
				2-Hexanone	591-78-6	10.0	3.34		ug/L	70	130	20	70	130	20		
				1,3-Dichloropropane	142-28-9	0.500	0.101		ug/L	70	130	20	70	130	20		
				Dibromochloromethane	124-48-1	0.500	0.0620		ug/L	70	130	20	70	130	20		
				Tetrachloroethene (PCE)	127-18-4	0.500	0.276		ug/L	70	130	20	70	130	20		
				Chlorobenzene	108-90-7	0.500	0.0666		ug/L	70	130	20	70	130	20		
				1,1,1,2-Tetrachloroethane	630-20-6	0.500	0.149		ug/L	70	130	20	70	130	20		
				Ethylbenzene	100-41-4	0.500	0.112		ug/L	70	130	20	70	130	20		
				m,p-Xylenes	179601-23-1	0.500	0.226		ug/L	70	130	20	70	130	20		
				Styrene	100-42-5	0.500	0.114		ug/L	70	130	20	70	130	20		
				o-Xylene	95-47-6	0.500	0.0720		ug/L	70	130	20	70	130	20		
				Bromoform	75-25-2	0.500	0.142		ug/L	70	130	20	70	130	20		
				1,1,2,2-Tetrachloroethane	79-34-5	0.500	0.101		ug/L	70	130	20	70	130	20		
				1,2,3-Trichloropropane	96-18-4	0.500	0.0540		ug/L	70	130	20	70	130	20		
				Isopropylbenzene	98-82-8	0.500	0.0840		ug/L	70	130	20	70	130	20		
				Bromobenzene	108-86-1	0.500	0.0860		ug/L	70	130	20	70	130	20		
				N-Propylbenzene	103-65-1	0.500	0.0880		ug/L	70	130	20	70	130	20		
				o-Chlorotoluene	95-49-8	0.500	0.0570		ug/L	70	130	20	70	130	20		
				p-Chlorotoluene	106-43-4	0.500	0.122		ug/L	70	130	20	70	130	20		
				1,3,5-Trimethylbenzene	108-67-8	0.500	0.0680		ug/L	70	130	20	70	130	20		
				tert-Butylbenzene	98-06-6	0.500	0.0940		ug/L	70	130	20	70	130	20		
				1,2,4-Trimethylbenzene	95-63-6	0.500	0.112		ug/L	70	130	20	70	130	20		
				sec-Butylbenzene	135-98-8	0.500	0.102		ug/L	70	130	20	70	130	20		
				m-Dichlorobenzene (1,3-DCB)	541-73-1	0.500	0.0840		ug/L	70	130	20	70	130	20		
				p-Dichlorobenzene (1,4-DCB)	106-46-7	0.500	0.0920		ug/L	70	130	20	70	130	20		
				p-Isopropyltoluene	99-87-6	0.500	0.0990		ug/L	70	130	20	70	130	20		
				o-Dichlorobenzene (1,2-DCB)	95-50-1	0.500	0.0760		ug/L	70	130	20	70	130	20		
				n-Butylbenzene	104-51-8	0.500	0.0560		ug/L	70	130	20	70	130	20		
				1,2,4-Trichlorobenzene	120-82-1	0.500	0.0700		ug/L	70	130	20	70	130	20		
				Naphthalene	91-20-3	0.500	0.146		ug/L	70	130	20	70	130	20		
				Xylenes, Total	1330-20-7	0.500	0.298		ug/L	70	130	20	70	130	20		
				Hexachlorobutadiene	87-68-3	0.500	0.0850		ug/L	70	130	20	70	130	20		
				1,3-Dichloropropene, Total	542-75-6	0.500	0.108		ug/L	70	130	20	70	130	20		
				1,2,3-Trichlorobenzene	87-61-6	0.500	0.105		ug/L	70	130	20	70	130	20		
				1,2-Dichloroethane-d4 (Surr)	17060-07-0				ug/L	70	130	20	70	130	20	70	130
				4-Bromofluorobenzene (Surr)	460-00-4				ug/L	70	130	20	70	130	20	70	130
				Toluene-d8 (Surr)	2037-26-5				ug/L	70	130	20	70	130	20	70	130
GP-GM-IO	pH	ISM4500 H+		pH	STL00204	0.0100			SU	98	102	2					
	Conductivity, Specific Conductance	2510B		Specific Conductance	STL00244	2.00	0.598		umhos/cm	90	110	10					

	Fluoride	4500 F_C		Fluoride	16984-48-8	0.0500	0.0135		mg/L	90	110	10	80	120	20		
	Solids, Total Dissolved (TDS)	2540C Calcd		Total Dissolved Solids	STL00242	10.0	4.22		mg/L	80	114	10					
GP-GM-IO	Alkalinity	2320B		Alkalinity as CaCO3	STL00171	2.00	0.493		mg/L	90	110	20	80	120	20		
				Bicarbonate Alkalinity as CaCO3	STL00138	2.00	0.493		mg/L								
				Carbonate Alkalinity as CaCO3	STL00154	2.00	0.493		mg/L								
				Hydroxide Alkalinity as CaCO3	STL00127	2.00	0.493		mg/L								
				Phenolphthalein Alkalinity	STL00188	2.00	0.493		mg/L								
GP-GM-IO	Anions, Ion Chromatography	300 OF 28D PREC		Chloride	16887-00-6	0.500	0.0147		mg/L	90	110	20	80	120	20		
				Sulfate	14808-79-8	0.250	0.0273		mg/L	90	110	20	80	120	20		
GP-GM-IO	Anions, Ion Chromatography	300 OF 48H PREC		Nitrate as N	14797-55-8	0.0500	0.00307		mg/L	90	110	20	80	120	20		
				Nitrite as N	14797-65-0	0.0500	0.00283		mg/L	90	110	20	80	120	20		
GP-GM-IO	Nitrogen, Nitrate-Nitrite	Nitrate Calc		Nitrate as N	14797-55-8	0.0300	0.0300		mg/L								
				Nitrate Nitrite as N	STL00217	0.0300	0.0120		mg/L								
				Nitrite as N	14797-65-0	0.0100	0.00300		mg/L								
GP-GM-IO	Cation Anion Balance	Cat Anion Mon		Total Cations	STL00474												
				Total Anions	STL00473												
				Percent Difference	STL00633												
				Anion/Cation Balance	STL00809												
				Ca	7440-70-2												
				Mg	7439-95-4												
				Na	7440-23-5												
				K	7440-09-7												
				Nitrate as N	14797-55-8												
				Sulfate	14808-79-8												
				Chloride	16887-00-6												
				Fluoride	16984-48-8												
				Carbonate Alkalinity as CaCO3	STL00154												
				Bicarbonate Alkalinity as CaCO3	STL00138												
				Total Dissolved Solids	STL00242												
				Calculated TDS	STL01010												
				TDS Ratio	STL01011												
GP-GM-IO	Langelier Index at 25C	Lang Index 25C		Calcium	7440-70-2	1.0			mg/L								
				Bicarbonate Alkalinity as CaCO3	STL00138	2.0			mg/L								
				pH of CaCO3 saturation (25C)	STL03081	0.01			SU								
				Langelier Index at 25C	STL03085	-1.0			LangSU								
				Field pH	STL00199	0.01			SU								
				pH	STL00204	0.01			SU								
GP-GM-IO	Langelier Index at 60C	Lang Index 60C		Calcium	7440-70-2	1.0			mg/L								
				pH of CaCO3 saturation (60C)	STL03082	0.01			SU								
				Langelier Index at 60C	STL03086	-1.0			LangSU								
				Alkalinity	STL00171	2.0			mg/L								
				Field pH	STL00199	0.01			SU								
				pH	STL00204	0.01			SU								
GP-GM-IO	Aggressive Index	Agress Index		Aggressive Index	STL01528	0.100			SU								
				pH	STL00204	0.100			S.U.								
				Alkalinity	STL00171	2.00			mg/L								
				Ca	7440-70-2	1.00			mg/L								
GP-GM-IO	Mercury (ICP/MS)	200.8 Hg	Auto ME NoPrep	Hg	7439-97-6	0.200	0.0790		ug/L	85	115	20	70	130	20		
GP-GM-IO	Metals (ICP/MS)	200.8	Auto ME NoPrep	Aluminum	7429-90-5	20.0	10.5		ug/L	85	115	20	70	130	20		
				Antimony	7440-36-0	1.00	0.479		ug/L	85	115	20	70	130	20		
				Arsenic	7440-38-2	1.00	0.491		ug/L	85	115	20	70	130	20		
				Beryllium	7440-41-7	1.00	0.177		ug/L	85	115	20	70	130	20		
				Selenium	7782-49-2	5.00	1.03		ug/L	85	115	20	70	130	20		
				Silver	7440-22-4	0.500	0.400		ug/L	85	115	20	70	130	20		
				Barium	7440-39-3	2.00	0.215		ug/L	85	115	20	70	130	20		
				Nickel	7440-02-0	5.00	0.378		ug/L	85	115	20	70	130	20		
				Cadmium	7440-43-9	0.500	0.0811		ug/L	85	115	20	70	130	20		
				Manganese	7439-96-5	2.00	0.410		ug/L	85	115	20	70	130	20		
				Chromium	7440-47-3	1.00	0.801		ug/L	85	115	20	70	130	20		
				Molybdenum	7439-98-7	2.00	0.219		ug/L	85	115	20	70	130	20		
				Thallium	7440-28-0	1.00	0.323		ug/L	85	115	20	70	130	20		
				Zinc	7440-66-6	20.0	4.28		ug/L	85	115	20	70	130	20		
				Copper	7440-50-8	2.00	0.275		ug/L	85	115	20	70	130	20		
				Uranium	7440-61-1	1.00	0.116		ug/L	85	115	20	70	130	20		
				Vanadium	7440-62-2	3.00	0.623		ug/L	85	115	20	70	130	20		
GP-GM-IO	Metals (ICP)	200.7	Auto ME NoPrep	Iron	7439-89-6	0.0100	0.00217		mg/L	85	115	20	70	130	20		
				Boron	7440-42-8	0.0500	0.00480		mg/L	85	115	20	70	130	20		

				Calcium	7440-70-2	1.00	0.0705	mg/L	85	115	20	70	130	20		
				Magnesium	7439-95-4	0.100	0.00994	mg/L	85	115	20	70	130	20		
				Potassium	7440-09-7	1.00	0.120	mg/L	85	115	20	70	130	20		
				Sodium	7440-23-5	1.00	0.410	mg/L	85	115	20	70	130	20		
GP-GM-IO	Carbon Dioxide and Forms of Alkalinity by Calculation	SM4500 CO2 D		pH	STL00204	1.00		SU								
				Bicarbonate Alkalinity as CaCO3	STL00138	2.00		mg/L								
				Carbon Dioxide, Free	STL00334	2.00		mg/L								
				Hydroxide as OH	STL01742	2.00		mg/L								
				Carbonate as CO3	STL01743	2.00		mg/L								
				Bicarbonate ion as HCO3	STL01745	2.00		mg/L								
GP-GM-IO	Methylene Blue Active Substances (MBAS)	5540C		Methylene Blue Active Substances	STL00077	0.100	0.0299	mg/L	90	110	20	80	120	20		
GP-GM-IO	Color, Colorimetric	2120B		Color, Apparent	STL01619	2.00		Color Units								
GP-GM-IO	Odor	SM2150 Odor B		Odor	STL00201	1.00		T.O.N.								
GP-GM-IO	Turbidity, Nephelometric	180.1		Turbidity	STL00189	0.100	0.0500	NTU	90	110	20					
GP-GM-IO	Cyanide, Total	335.4	Distill CN	Cyanide, Total	57-12-5	0.00500	0.00200	mg/L	90	110	20	90	110	20		
SOC	EDB, DBCP and 1,2,3-TCP (GC)	504.1 PREC	504.1 Prep	1,2-Dibromoethane	106-93-4	0.0100	0.00400	ug/L	70	130		65	135	20		
				1,2-Dibromo-3-Chloropropane	96-12-8	0.0100	0.00200	ug/L	70	130		65	135	20		
				1,2-Dibromopropane (Surr)	78-75-1			ug/L	70	130		65	135	20	60	140
SOC	Organochlorine Pesticides/PCBs (GC)	505 PREC	505 Prep	Chlordane	57-74-9	0.100	0.0320	ug/L	70	130	20	65	135	20		
				Endrin	72-20-8	0.0100	0.00500	ug/L	70	130	20	65	135	20		
				Heptachlor epoxide (isomer B)	1024-57-3	0.0100	0.00500	ug/L	70	130	20	65	135	20		
				Methoxychlor	72-43-5	0.0500	0.0220	ug/L	70	130	20	65	135	20		
				Lindane	58-89-9	0.0100	0.00700	ug/L	70	130	20	65	135	20		
				Alachlor (Alanex)	15972-60-8	0.100	0.0410	ug/L	70	130	20	65	135	20		
				Toxaphene	8001-35-2	0.500	0.0830	ug/L	70	130	20	65	135	20		
				PCB-1016	12674-11-2	0.0700	0.0220	ug/L	70	130	20	65	135	20		
				PCB-1221	11104-28-2	0.100	0.0790	ug/L	70	130	20	65	135	20		
				PCB-1232	11141-16-5	0.100	0.0850	ug/L	70	130	20	65	135	20		
				PCB-1242	53469-21-9	0.100	0.0720	ug/L	70	130	20	65	135	20		
				PCB-1248	12672-29-6	0.100	0.0230	ug/L	70	130	20	65	135	20		
				PCB-1254	11097-69-1	0.100	0.0350	ug/L	70	130	20	65	135	20		
				PCB-1260	11096-82-5	0.0700	0.0330	ug/L	70	130	20	65	135	20		
				Polychlorinated biphenyls, Total	1336-36-3	0.100	0.0850	ug/L	70	130	20	65	135	20		
				Aldrin	309-00-2	0.0100	0.00200	ug/L	70	130	20	65	135	20		
				Dieldrin	60-57-1	0.0100	0.00500	ug/L	70	130	20	65	135	20		
				Tetrachloro-m-xylene	877-09-8			ug/L	70	130		70	130		70	130
SOC	Herbicides (GC)	515.4 PREC	515.4 Prep	2,4,5-TP (Silvex)	93-72-1	0.200	0.0220	ug/L	70	130	30	70	130	30		
				2,4,5-T	93-76-5	0.200	0.0300	ug/L	70	130	30	70	130	30		
				Dinoseb	88-85-7	0.200	0.0240	ug/L	70	130	30	70	130	30		
				2,4-D	94-75-7	0.100	0.0280	ug/L	70	130	30	70	130	30		
				2,4-DB	94-82-6	2.00	0.524	ug/L	70	130	30	70	130	30		
				Bentazon	25057-89-0	0.500	0.0630	ug/L	70	130	30	70	130	30		
				Pentachlorophenol	87-86-5	0.0400	0.00500	ug/L	70	130	30	70	130	30		
				Dalapon	75-99-0	1.00	0.122	ug/L	70	130	30	70	130	30		
				3,5-Dichlorobenzoic acid	51-36-5	0.500	0.0690	ug/L	70	130	30	70	130	30		
				Picloram	1918-02-1	0.100	0.0150	ug/L	70	130	30	70	130	30		
				Acifluorfen	50594-66-6	0.200	0.0350	ug/L	70	130	30	70	130	30		
				Dicamba	1918-00-9	0.100	0.0170	ug/L	70	130	30	70	130	30		
				Dichlorprop	120-36-5	0.500	0.0560	ug/L	70	130	30	70	130	30		
				DCPA Mon/Di-Acid Degradates	STL00697	0.100	0.0440	ug/L	70	130	30	70	130	30		
				2,4-Dichlorophenylacetic acid (Surr)	19719-28-9			ug/L							70	130
SOC	Carbamate Pesticides (HPLC)	531.2 PREC	Filtration IC	3-Hydroxycarbofuran	16655-82-6	0.500	0.143	ug/L	70	130	30	70	130	30		
				Aldicarb	116-06-3	0.500	0.160	ug/L	70	130	30	70	130	30		
				Aldicarb sulfone	1646-88-4	0.500	0.172	ug/L	70	130	30	70	130	30		
				Aldicarb sulfoxide	1646-87-3	0.500	0.142	ug/L	70	130	30	70	130	30		
				Baygon	114-26-1	0.500	0.247	ug/L	70	130	30	70	130	30		
				Carbaryl	63-25-2	0.500	0.160	ug/L	70	130	30	70	130	30		
				Carbofuran	1563-66-2	0.500	0.104	ug/L	70	130	30	70	130	30		
				Methiocarb	2032-65-7	0.500	0.114	ug/L	70	130	30	70	130	30		
				Methomyl	16752-77-5	0.500	0.174	ug/L	70	130	30	70	130	30		
				Oxamyl	23135-22-0	0.500	0.173	ug/L	70	130	30	70	130	30		
				BDMC	672-99-1			ug/L							70	130
SOC	Glyphosate (DAI HPLC)	547 PREC	Filtration IC	Glyphosate	1071-83-6	6.00	1.60	ug/L	80	120	20	80	120	20		
SOC	Endothall (GC/MS)	548.1 PREC	548.1 P	Endothall	145-73-3	5.00	2.65	ug/L	80	120	30	80.0	120	30		
SOC	Diquat and Paraquat (HPLC)	549.2 PREC	549.2 P	Diquat	2764-72-9	0.400	0.344	ug/L	70	130	20	70	130	20		
				Paraquat	4685-14-7	2.00	0.180	ug/L	70	130	20	70	130	20		

SOC	Semivolatile Organic Compounds (GC/MS)	525.2 PREC	525.2 Prep	2,4-Dinitrotoluene	121-14-2	0.100	0.0560		ug/L	70	130	20	70	130	20		
				Acenaphthylene	208-96-8	0.100	0.0100		ug/L	70	130	20	70	130	20		
				Alachlor (Alanex)	15972-60-8	0.0500	0.0240		ug/L	70	130	20	70	130	20		
				alpha-Chlordane	5103-71-9	0.0500	0.00600		ug/L	70	130	20	70	130	20		
				Anthracene	120-12-7	0.0200	0.00400		ug/L	70	130	20	70	130	20		
				Atrazine	1912-24-9	0.0500	0.0130		ug/L	70	130	20	70	130	20		
				Benz(a)anthracene	56-55-3	0.0500	0.0100		ug/L	70	130	20	70	130	20		
				Benzo(a)pyrene	50-32-8	0.0200	0.00400		ug/L	70	130	20	70	130	20		
				Benzo(b)fluoranthene	205-99-2	0.0200	0.00400		ug/L	70	130	20	70	130	20		
				Benzo(g,h,i)perylene	191-24-2	0.0500	0.0240		ug/L	70	130	20	70	130	20		
				Benzo(k)fluoranthene	207-08-9	0.0200	0.00500		ug/L	70	130	20	70	130	20		
				Bromacil	314-40-9	0.100	0.0350		ug/L	70	130	20	70	130	20		
				Butachlor	23184-66-9	0.0500	0.0120		ug/L	70	130	20	70	130	20		
				Butylbenzylphthalate	85-68-7	0.500	0.111		ug/L	70	130	20	70	130	20		
				Caffeine	58-08-2	0.0500	0.00800		ug/L	45	137	20	46	144	20		
				Chrysene	218-01-9	0.0200	0.00300		ug/L	70	130	20	70	130	20		
				Di(2-ethylhexyl)adipate	103-23-1	0.600	0.0630		ug/L	70	130	20	70	130	20		
				Bis(2-ethylhexyl) phthalate	117-81-7	0.600	0.190		ug/L	70	130	20	70	130	20		
				Diazinon (Qualitative)	333-41-5	0.100	0.0250		ug/L	15	132	20	15	132	20		
				Dibenz(a,h)anthracene	53-70-3	0.0500	0.0240		ug/L	70	130	20	70	130	20		
				Dieldrin	60-57-1	0.0100	0.00700		ug/L	70	130	20	70	130	20		
				Diethylphthalate	84-66-2	0.500	0.0440		ug/L	70	130	20	70	130	20		
				Dimethoate	60-51-5	0.100	0.0350		ug/L	11	110	20	11	110	20		
				Dimethylphthalate	131-11-3	0.500	0.0280		ug/L	70	130	20	70	130	20		
				Di-n-butyl phthalate	84-74-2	1.00	0.174		ug/L	70	130	20	70	130	20		
				Endrin	72-20-8	0.0100	0.00500		ug/L	70	130	20	70	130	20		
				Fluoranthene	206-44-0	0.100	0.00600		ug/L	70	130	20	70	130	20		
				Fluorene	86-73-7	0.0500	0.00800		ug/L	70	130	20	70	130	20		
				gamma-Chlordane	5103-74-2	0.0500	0.00500		ug/L	70	130	20	70	130	20		
				Hexachlorobenzene	118-74-1	0.0500	0.0150		ug/L	70	130	20	70	130	20		
				Hexachlorocyclopentadiene	77-47-4	0.0500	0.0100		ug/L	70	130	20	70	130	20		
				Indeno[1,2,3-cd]pyrene	193-39-5	0.0500	0.0320		ug/L	70	130	20	70	130	20		
				Isophorone	78-59-1	0.100	0.0180		ug/L	70	130	20	70	130	20		
				Lindane	58-89-9	0.0100	0.00300		ug/L	70	130	20	70	130	20		
				Methoxychlor	72-43-5	0.0500	0.0440		ug/L	70	130	20	70	130	20		
				Metolachlor	51218-45-2	0.0500	0.0130		ug/L	70	130	20	70	130	20		
				Metribuzin	21087-64-9	0.0500	0.0340		ug/L	70	130	20	70	130	20		
				Molinate	2212-67-1	0.100	0.0360		ug/L	70	130	20	70	130	20		
				Phenanthrene	85-01-8	0.0400	0.00600		ug/L	70	130	20	70	130	20		
				Propachlor	1918-16-7	0.0500	0.0400		ug/L	70	130	20	70	130	20		
				Pyrene	129-00-0	0.0500	0.00800		ug/L	70	130	20	70	130	20		
				Simazine	122-34-9	0.0500	0.0160		ug/L	70	130	20	70	130	20		
				Thiobencarb	28249-77-6	0.100	0.0440		ug/L	70	130	20	70	130	20		
				trans-Nonachlor	39765-80-5	0.0500	0.00500		ug/L	70	130	20	70	130	20		
				Trifluralin	1582-09-8	0.100	0.0520		ug/L	70	130	20	70	130	20		
				2-Nitro-m-xylene	81-20-9				ug/L				70	130		70	130
				Triphenylphosphate	115-86-6				ug/L							70	130
				Perylene-d12	1520-96-3				ug/L							70	130
SOC	Tetra Chlorinated Dioxin (GC/MS/MS)	1613B IDA	1613B P. SPE	2,3,7,8-TCDD	1746-01-6	5.00	2.10		pg/L	73	146	20	73	146	20		
				13C-2,3,7,8-TCDD	76523-40-5				pg/L	25	141		25	141			
SOC	Volatile Organic Compounds (GC/MS)	CA SRL 524M SIM		1,2,3-Trichloropropane	96-18-4	0.00500	0.000684		ug/L	80	120	20	70	130	20		
				Toluene-d8 (Surr)	2037-26-5				ug/L	70	130	20	70	130	20	70	130
Radchem	Gross Alpha and Gross Beta Radioactivity	900.0	Evaporation	Gross Beta	12587-47-2	4.00			pCi/L	75	125	25	60	140	25		
Radchem	Gross Alpha by Co-Precipitation	SM7110C	COPRECIP	Gross Alpha	12587-46-1	3.00			pCi/L	75	125	25	60	140	25		
Radchem	Radium-226 (GFPC)	903.0	PrecSep 21	Radium-226	13982-63-3	1.00			pCi/L	75	125	25	60	140	25		
				Ba Carrier	7440-39-3	1.00			g							30	110
Radchem	Radium-228 (GFPC)	904.0	PrecSep 0	Radium-228	15262-20-1	1.00			pCi/L	75	125	25	60	140	25		
				Ba Carrier	7440-39-3				g							30	110
				Y Carrier	7440-65-5				g							30	110
Radchem	Strontium-90 (GFPC)	905 Sr90	PrecSep 7	Strontium-90	10098-97-2	3.00			pCi/L	75	125	25	60	140	25		
				Sr Carrier	STL01827				g							30	110
				Y Carrier	7440-65-5				g							30	110
Radchem	Tritium, Total (LSC)	906.0	LSC Dist Susp	Tritium	10028-17-8	500			pCi/L	75	125	25	60	140	25		
Radchem	Metals (ICP/MS)	200.8	Auto ME NoPrep	Uranium	7440-61-1	1.00	0.116		ug/L	85	115	20	70	130	20		
Explosives	Nitroaromatics and Nitramines (LC/MS)	8321B Exp	3535	TNT	118-96-7	0.100	0.0300	0.0600	ug/L	10	145	68	10	145	70		
				HMX	2691-41-0	0.100	0.0330	0.0600	ug/L	63	119	34	63	119	48		
				RDX	121-82-4	0.100	0.0270	0.0600	ug/L	71	127	25	71	127	26		
				1,3-Dinitrobenzene-d4	54247-05-1				ug/L								
				2,4-dinitrotoluene-d3	93951-68-9				ug/L								
				Nitrobenzene-d5 (Surr)	4165-60-0	0.100	0.0500	0.0600	ug/L							48	130

8015	Diesel Range Organics (DRO) (GC)	8015B_DRO	3510C_LVI	C13-C22	STL00402	50.0	36.0		ug/L								
				C23-C40	STL00625	50.0	36.0		ug/L								
				Diesel Range Organics [C10-C28]	STL00143	50.0	36.0	40.0	ug/L	65	129	30	33	160	40		
				n-Octacosane (Surr)	630-02-4				ug/L						53		151
8015	Gasoline Range Organics - (GC)	8015B_GRO	5030C	Gasoline Range Organics	STL00215	50.0	29.5	60.0	ug/L								
				Gasoline Range Organics (C4-C13)	STL01719	50.0	29.5	60.0	ug/L	71	120	20	54	125	20		
				4-Bromofluorobenzene (Surr)	460-00-4				ug/L						20		144
1664A	HEM and SGT-HEM	1664A	1664A P W	Total Petroleum Hydrocarbons (SGT-HEM)	STL00240	1.00	0.636		mg/L	64	132	34	64	132	34		



May 13, 2024

SENT VIA EMAIL: [dwpdist22@waterboards.ca.gov]

Bill Liang, P.E.
State Water Resource Control Board
Division of Drinking Water
500 North Central Ave., Suite 500
Gendale, CA 91203

Subject: System NO. 1910240, Response to the Division of Drinking Water Comment Letter for the Well V201 Technical Report

Dear Mr. Liang,

The Division of Drinking Water (DDW) provided an additional set of Comments on the Well V201 Technical Report on February 22, 2024. In the letter, DDW requested further information and clarification from the first comment letter, dated October 16, 2023, regarding the submitted V201 Technical Report, dated December 22, 2022. SCVWA reviewed the letter and retained Jennifer Nyman, Senior Environmental Engineer, from Geosyntec Consultants and John Porcello, Principal Groundwater Hydrologist, from GSI Water Solutions to assist with addressing the comments from DDW.

Some of the comments requested additional or edited figures. SCVWA has completed the figures, and they are included in this response letter. If DDW deems that these responses adequately address the comments, then SCVWA will incorporate the responses and submit finalized document ahead of a draft permit.

If you have any questions, please contact me at (661) 259-1635 or janderson@scvwa.org.

Sincerely,

A handwritten signature in blue ink that reads "Jenny Anderson".

Jenny Anderson
Water Quality Specialist
Santa Clarita Valley Water Agency

The following responses are prepared and submitted by Santa Clarita Valley Water Agency (SCVWA) in response to draft comments received in February 2024 from the Division of Drinking Water (DDW) on the Drinking Water Guideline 97-005 Documentation Report for Well V201 dated 22 December 2022 (Report). DDW subsequently provided comments on the Report in a letter to Mr. Keith Abercrombie at SCVWA dated 16 October 2023. SCVWA provided responses to the comments on 15 November 2023 and DDW followed-up with additional questions on 22 February 2024.

Following DDW review of this response to comments and subsequent discussion, SCVWA anticipates the Report will be updated, and resubmitted to DDW. If you have any questions regarding the SCVWA responses to the DDW comments, please contact us.

The numbered DDW comments are listed below, with responses from SCVWA provided for each of the DDW comments. The figure and table numbers will be updated once approved and incorporated into the 97-005 document.

1. DDW Comment: (Combined Comments #1 and #2) Please identify and provide a list of known or suspected contaminated sites, including the contaminants at these sites and their associated concentrations (e.g., starting, and current concentrations), along with the contaminants of concern (COC) concentrations within and near the Whittaker-Bermite site. At a minimum, this should include the SIC, and the LARWQCB and DTSC cleanup sites within the capture zones of Well V201.

SCVWA Response: Attached Table 1: Potential Contaminant Sources in Well V201 Capture Zone provides a list of known or suspected contaminated sites, including the contaminants at these sites and their associated concentrations (e.g., starting, and current concentrations), along with the contaminants of concern (COC) concentrations within and near the Whittaker-Bermite site.

2. DDW Comment: (Comment #3) Please include all known or suspected contaminated areas and plumes identified in Comment #1 into the revised Figure X provided in the Comment Response Submittal. The Figure should not only include the Whittaker-Bermite site, but also include the SIC, and the LARWQCB and DTSC cleanup sites within the capture zones of Well V201.

SCVWA Response: Figure X includes a map of the potential or suspected known contaminated sites within the capture zone of Well V201 that are described in Table 1.

3. DDW Comment: (Comment #4)
 - a. Besides perchlorate and TCE (VOC), please identify the other known COCs and the potential COCs for Well V201. This should include the potential COCs from the known or suspected contaminated sites identified in Comments #1, #2, and #3.

SCVWA Response: SCV Water has not identified other known COCs or potential COCs in Saugus Formation groundwater for Well V201. Contaminants at known contaminated sites, as identified in Comment #1, were evaluated, and were not determined to be COCs or potential COCs.

In this area the hydraulic communication between the Alluvial Aquifer (nearest the groundwater surface) and the Saugus Formation (from which Well V201 extracts) is limited. The Saugus Formation is confined, with the S-II aquitard (approximately 85 feet thick) providing vertical separation from the Alluvial Aquifer and other shallow groundwater in the area of its deep subsurface capture zones. The top well screen of Well V201 is at approximately 540 feet below ground surface, with an annular seal of 460 feet below ground surface, which means there is a significant vertical distance between the Alluvial Aquifer and the zones from which Well V201 extracts.

Furthermore, analysis of each individual site within the two-dimensional footprint of the Well V201 capture zones and their use (Sections 3.3.2 to 3.3.4) did not identify potential adverse impacts to Saugus Formation groundwater. Groundwater monitoring data from Well V201 also does not indicate contributions of COCs from these sites to Well V201. Any Alluvial Aquifer water captured by Well V201 is from distant areas, with long travel times for migration to Well V201 (greater than 15 years).

Even though potential COCs were not identified, Table 6-9, Proposed Surveillance Well Monitoring Program, has been updated to include analysis of hydrocarbons and fuel oxygenates at V201 and V205.”

- b. The response for Comment #4 states that “... SCVWA expects to continue sampling many, if not all, of its water supply wells for PFOS and PFOA.” Please clarify if the samples include all the PFAS chemicals from USEPA Method 533 or if they only include PFOS and PFOA at all its water supply wells.

SCVWA Response: SCVWA will collect samples with EPA Method 533 or current DDW method that includes all analyzed PFAS constituents.

4. DDW Comment: (Comment #7) Please identify the monitoring wells intended for Well V201.

SCVWA Response: The wells proposed as monitoring wells for V201 are outlined and discussed in section 6.6. The monitoring wells include DW-1, Library wells, and mall wells. In addition, water supply wells V205 and Saugus wells 1 and 2 provide data that are relevant to the Saugus formation and nearby to V201.

5. DDW Comment: (Comment #9a) Please include the results of the groundwater flow model that were presented in the October 2022 Containment Evaluation report to demonstrate comparable results with the 2012 to 2014 groundwater flow model.

SCVWA Response: In comment 9a, SCV noted that a recent (October 2022) Containment Evaluation Report presented a model-derived groundwater capture zone for well V201 (under future operations) that was similar to the capture zone simulated for the future

operation of this well using an older model for an analysis that SCV Water conducted in 2013.

The 2013 figure presented a composite capture zone for the multiple depths zones in the Saugus Formation, whereas the 2022 analysis examined capture by initiating particles separately for the two primary water-bearing Saugus Formation HSUs that are screened by production wells and have had detectable levels of perchlorate (HSU-SIIIc and HSU-SVa). Despite the differences in the presentation of particle-tracking results, it is still possible to compare the capture zones for V201 from the 2013 and 2022 analyses. Under the highest-pumping scenarios for both V201 and V205, the attached figure compares the time-related V201 capture areas from the 2013 analyses with a capture area from the 2022 analyses that encompasses longer time frames than analyzed in 2013. The comparison shows that the footprints are similar, though in areas east of V201 the 2022 capture area extends a bit further east than the 2013 capture area. Note that the V201 capture zone in the 2022 analysis extends further to the north and south than is shown for the view frame displayed on Figure Y.

6. DDW Comment: (Comment #21) Please collect one set of samples at Well V201 for PFAS using USEPA Method 533 and include a discussion of the results in the revised report (if any additional PFAS chemicals were detected).

SCVWA Response: Well V201 is not currently equipped with a pump and motor and is currently under construction to add GAC treatment. Before placing the well online, SCVWA will collect PFAS samples under EPA method 533 and will provide laboratory results to DDW.

7. DDW Comment: (Comment #25) Please provide the breakthrough curve(s) for the GAC vessels or other supporting documents/data to support the responses provided in Comment #25.

SCVWA Response: NSF, throughput curves and approximate bed volumes before a media change out will be incorporated into the 97-005 document, Appendix H, NSF Certification and Supporting Permit Amendment Documents.

8. DDW Comment: (Comment #26c) The surveillance plan should also include the potential COCs identified from the sites from Comments #1 to #3.

SCVWA Response: Table 6-9, Proposed Surveillance Well Monitoring Program has been updated to include hydrocarbons and fuel oxygenates at V201 and V205. SCVWA intends to request a reduction in monitoring for certain parameters at the water supply wells and monitoring wells.

Comment #1

**Table 1
Potential Contaminant Sources in Well V201 Capture Zone
Santa Clarita Valley Water Agency**

Site ID	Site Name	Site Address	Site Status	Site Activities	Matrices Impacted	Potential Chemicals		Maximum Concentrations			Groundwater Monitoring	Remedial Actions
						General Category	Specific	Starting	Most Recent	Matrix		
Geotracker ID: T060379630	Shell Service Station	24301 Valencia Boulevard Valencia, CA 91355	Closed	Gas station with USTs	Soil and groundwater	TPH, VOCs, fuel oxygenates	TPHg	1,400 µg/L	<50 µg/L	Groundwater	Quarterly Monitoring; groundwater monitoring wells last sampled on April 5, 2017.	Soil remediation measures include soil excavation and the implementation of an SVE system (March 2014 through November 2014). Groundwater remediation measures include a DPE pilot test (March 2009), an aquifer pump test (January through August 2010), and air sparging (April through November 2014).
							TPHd	N/A	58 µg/L			
							MTBE	1,700 µg/L	<0.50 µg/L			
							ETBE	3.4 µg/L	<0.50 µg/L			
							TAME	3.9 µg/L	<0.50 µg/L			
							TBA	590 µg/L	<10 µg/L			
Geotracker ID: T0603732554	Newhall Land and Farming CO	23823 W. Valencia Boulevard Valencia, CA 91355	Closed	N/A	Soil	TPH, VOCs	TPHg	Non-detect	N/A	Soil	N/A	A Phase II assessment was performed; there were no detections of the listed compounds.
							BTEX	Non-detect	N/A			
							Oxygenate compounds	Non-detect	N/A			
Geotracker ID: T0603704904	LA CO Sheriff Station	23740 Magic Mountain Parkway Santa Clarita, CA 91355	Open - Remediation	Fueling station for sheriff station	Soil and groundwater	TPH, VOCs, fuel oxygenates	TPHg	41 µg/L	14,000 µg/L	Groundwater	Groundwater monitoring was conducted semiannually. Groundwater monitoring wells last sampled in November, 2023.	SVE between July 1999 through December 2003; Oxygen release compound groundwater injections in December 1999; DPE system through October 2005 to February 2010; three HVDE remediation events between June 2013 and November 2014.
							Benzene	6,300 µg/L	7,600 µg/L			
							Toluene	11,000 µg/L	820 µg/L			
							Ethylbenzene	780 µg/L	180 µg/L			
							Xylenes, Total	4,500 µg/L	570 µg/L			
							MTBE	130,000 µg/L	1,200 µg/L			
							TBA	<50 µg/L	110 µg/L			
							TAME	<20 µg/L	<3.9 µg/L			
							Ethanol	<250 µg/L	<520 µg/L			
							PCE	N/A	9.3 µg/L			
Geotracker ID: T0603782642	Terry York Chevrolet, Inc.	23649 Creekside Road Valencia, CA 91355	Closed	Former car dealership with leaking USTs	Soil	VOCs, fuel oxygenates	TPHg	2.1 mg/kg	8,310 mg/kg	Soil	N/A	USTs removed with surrounding soil excavated and samples collected from the bottom of excavations.
							Benzene	0.047 mg/kg	<0.001 mg/kg			
							Ethylbenzene	0.12 mg/kg	389 mg/kg			
							Xylenes, Total	0.062 mg/kg	1,600 mg/kg			
							MTBE	0.68 mg/kg	<0.001 mg/kg			
Geotracker ID: T0603703248	Frontier Toyota	23621 Creekside Road Valencia, CA 91355	Closed	Former car dealership with leaking USTs	Groundwater	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Geotracker ID: T0603702927	Scott Irwine Chevrolet	23649 Valencia Boulevard Valencia, CA 91355	Closed	Leaking Tank(s)	Soil	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Geotracker ID: T0603704775	Ferguson BMW	24030 Creekside Road Valencia, CA 91355	Closed	Leaking Tank(s)	Soil	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Geotracker ID: SL204BV2362	Dry Cleaners at Granary Square	25840 McBean Parkway Valencia, CA	Closed	Former dry cleaner with a waste solvent aboveground storage tank	Soil	VOCs	N/A	N/A	N/A	N/A	Subsurface investigations of soil and soil vapor were conducted in 2000 and 2001.	SVE operated between December 2001 and March 2002 with subsequent soil confirmation samples.
EnviroStor ID: 19281087	Whittaker Bermite	22116 Soledad Canyon RD Santa Clarita, CA 91350	Open - Remediation	Former explosives manufacturing, storage, and testing facility	Soil, soil vapor, and groundwater	Perchlorate VOCs	Perchlorate	254,000 µg/L	48,000 µg/L	Groundwater	Quarterly groundwater monitoring.	Groundwater extraction and treatment (startup in August 2017), permeable reactive zone; SVE (historical); soil excavation and treatment
							Chlorate	24,000 µg/L	N/A			
							TCE	17,000 µg/L	4,800 µg/L			
							PCE	48,000 µg/L	37,000 µg/L			
							cis -1,2-DCE	89 µg/L	570 µg/L			
							1,1-DCE	29,000 µg/L	1,100 µg/L			
							1,1,1-TCA	2,200 µg/L	880 µg/L			
							PFAS	N/A	up to 600 ng/L (PFOA)			
EnviroStor ID: 19550031	Terry York Chrysler	23923 Creekside Road Valencia, CA 91350	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EnviroStor ID: 19550032	Terry York Honda	23901 Creekside Road Valencia, CA 91350	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Table 1
Potential Contaminant Sources in Well V201 Capture Zone
Santa Clarita Valley Water Agency**

Site ID	Site Name	Site Address	Site Status	Site Activities	Matrices Impacted	Potential Chemicals		Maximum Concentrations			Groundwater Monitoring	Remedial Actions
						General Category	Specific	Starting	Most Recent	Matrix		
EnviroStor ID: 80001118	Newhall Airfield	Newhall, CA	Inactive	Former landing field	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EnviroStor ID: 19280025	Saugus Industrial Center	26000 Springbrook Avenue Saugus, CA	Open - Remediation	Former polyvinyl chloride processing facility	Soil, soil vapor, and groundwater	VOCs, fuel oxygenates	1,2-DCA	2,500 µg/L	3,700 µg/L	Groundwater	Quarterly groundwater monitoring and SVE progress reporting.	SVE and enhanced in-situ bioremediation has been on- going since 2016.
							Acetone	N/A	780 µg/L			
							MEK	N/A	700 µg/L			
							MBK	N/A	730 µg/L			
							MIBK	N/A	120 µg/L			
							Benzene	N/A	0.86 µg/L			
							Carbon Disulfide	N/A	2.8 µg/L			
							Carbon Tetrachloride	N/A	1.0 µg/L			
							Chloroethane	16 µg/L	13 µg/L			
							Chloroform	7.7 µg/L	840 µg/L			
							Chloromethane	N/A	2.6 µg/L			
							<i>cis</i> -1,2-DCE	9.9 µg/L	290 µg/L			
							PCE	0.98 µg/L	1.4 µg/L			
							Toluene	N/A	360,000 µg/L			
TCE	N/A	280 µg/L										
Vinyl chloride	52 µg/L	330 µg/L										

Acronyms:

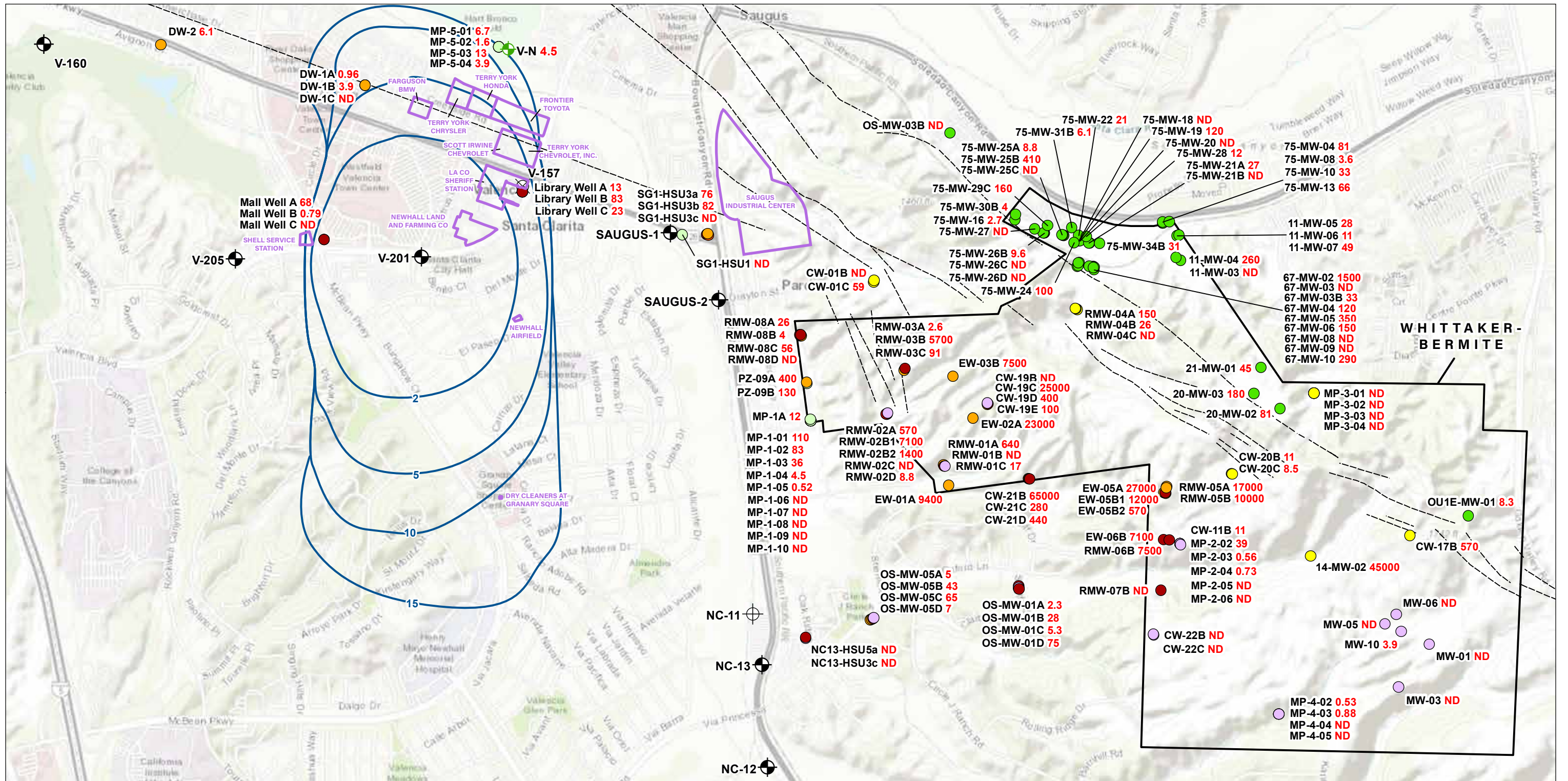
< = less than
 µg/L = micrograms per liter
 1,1-DCE = 1,1-dichloroethene
 1,1,1-TCA = 1,1,1-trichloroethane
 BTEX = benzene, toluene, ethylbenzene, and xylenes
 CA = California
cis -1,2-DCE = *cis* -1,2-dichloroethene
 DCA = dichloroethane
 DCE = dichloroethene

DPE = dual phase extraction
 ETBE = Ethyl tertiary-butyl ether
 HVDE = high-vacuum dual phase extraction
 ID = Identification
 J = estimated concentration
 MBK = methyl butyl ketone
 MEK = methyl ethyl ketone
 mg/kg = milligrams per kilogram
 mg/L = milligrams per liter

MIBK = methyl isobutyl ketone
 MTBE = methyl tertiary butyl ether
 N/A = not applicable or not available
 ng/L = nanograms per liter
 PCE = tetrachloroethene
 PFAS = per- and polyfluoroalkyl substances
 PFOA = perfluorooctanoic acid
 PRP = potentially responsible party
 SVE = soil vapor extraction

TAME = Tertiary-amyl methyl ether
 TBA = tertiary butyl alcohol
 TCE = trichloroethene
 TPH = total petroleum hydrocarbons
 TPHg = total petroleum hydrocarbons (gasoline fraction)
 TPHd = total petroleum hydrocarbons (diesel fraction)
 UST = underground storage tank
 VOCs = volatile organic compounds

Comment #2



LEGEND

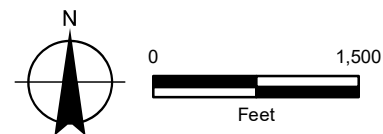
- Saugus Production Wells
- Alluvial/Saugus Production Well
- Saugus S-III
- Saugus S-Va
- Inactive Well
- Saugus
- Saugus S-IIIa
- Saugus S-Vc
- Destroyed Well
- Saugus S-I
- Saugus S-IIIb
- Saugus S-VII
- Former Whittaker-Bermite Facility
- Capture Zone with Travel Time in Years
- Potential Contaminant Sites

NOTE

Onsite Whittaker monitoring well concentration values are from May-June 2019.

FIGURE X

Well V201 Capture Zones and May-June 2021 Perchlorate Concentrations in All Saugus Formation HSUs



Comment #5

Comment #8

Table 6-9: Proposed Surveillance Well Monitoring Program

Well Name	Well Type	Screened Interval, feet bgs ^(c)	Water Level	Parameter ^(a,b)						
				General Mineral/General Physical	Inorganic ^(d)	Perchlorate	Radiological	VOCs ^(e)	SOC ^(f)	Hydrocarbons, Fuel Oxygenates
Well V-201	Supply	Multiple	No	Annual	Annual	Monthly	Annual	Quarterly	Annual	Quarterly
Well V-205	Supply	Multiple	No	Annual	Annual	Monthly	Annual	Quarterly	Annual	Quarterly
DW-1A	Monitoring	780 - 800	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	
DW-1B	Monitoring	985 - 1005	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	
DW-1C	Monitoring	1180 - 1200	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	
Library A	Monitoring	662 - 642	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	
Library B	Monitoring	722 - 742	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	
Library C	Monitoring	832 - 852	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	
Mall A	Monitoring	785 - 805	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	
Mall B	Monitoring	885 - 905	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	
Mall C	Monitoring	1070 - 1090	Yes	Annual	Annual	Monthly	Annual	Quarterly	Annual	

Notes:

- (a) SCVWA will propose reduced monitoring frequency for certain parameters.
- (b) Water quality parameters for each category are defined as per California Code Regulations, Title 22 requirements.
- (c) Feet bgs denotes feet below ground surface.
- (d) Excludes analysis for asbestos.
- (e) VOC denotes Volatile Organic Compounds.
- (f) SOC denotes Synthetic Organic Compounds.



November 15, 2023

SENT VIA EMAIL: [\[dwpdist22@waterboards.ca.gov\]](mailto:dwpdist22@waterboards.ca.gov)

Bill Liang, P.E.
State Water Resource Control Board
Division of Drinking Water
500 North Central Ave., Suite 500
Glendale, CA 91203

Subject: System NO. 1910240, Response to the Division of Drinking Water Comment Letter for the Well V201 Technical Report

Dear Mr. Liang,

The Division of Drinking Water (DDW) provided Comments for Well V201 Technical on October 16, 2023. In the letter, DDW requested further information and clarification regarding the submitted V201 Technical Report, dated December 2022. SCVWA reviewed the letter and has addressed the comments from DDW.

Some of the comments requested additional or edited figures. SCVWA has completed many of the figures which are included in this response letter. There are a few figures that will take longer to create and will be provided at a future date. If DDW deems that these responses adequately address the comments, then SCVWA will incorporate the responses and submit finalized document ahead of a draft permit.

If you have any questions, please contact me at (661) 259-1635 or janderson@scvwa.org.

Sincerely,

A handwritten signature in cursive script that reads "Jenny Anderson".

Jenny Anderson
Water Quality Specialist
Santa Clarita Valley Water Agency – Valencia Water Division

The following responses are prepared and submitted by Santa Clarita Valley Water Agency (SCVWA) in response to draft comments received in June 2023 from the Division of Drinking Water (DDW) on the *Drinking Water Guideline 97-005 Documentation Report for Well V201* dated December 2022 (Report). DDW subsequently provided comments on the Report in a letter to Mr. Keith Abercrombie of SCVWA dated 16 October 2023.

Following DDW review of this response to comments and subsequent discussion, SCVWA anticipates the Report will be revised, updated, and resubmitted to DDW. If you have any questions regarding the SCVWA responses to the DDW comments, please contact us.

The numbered DDW comments are listed below, with responses from SCVWA provided for each of the DDW comments.

1. DDW Comment: Please present map(s) showing the locations of the known or suspected contaminating activities, including the spill or disposal sites in accordance with Section 1.a. Drinking Water Source Assessment of the Process Memo.

SCVWA Response: Using information obtained from a formal environmental database records search, chemical use sites located within the estimated capture zones of Well V201 are shown on Figure 3-1 of the Report. Figure 3-1 will be modified, or a new figure displaying known or suspected contaminating activities will be added to the Report. The figure will focus on sources potentially contributing chemicals of concern (COCs) to Saugus Formation groundwater within the estimated capture zone of Well V201 and will include the locations of the Whittaker-Bermite and SIC (Saugus Industrial Center) sites.

Sites with potential chemical impacts overlying the capture zones of Well V201 will also be included on the figure, noting, however, that in this area the hydraulic communication between the Alluvial Aquifer (nearest the groundwater surface) and the Saugus Formation (from which Well V201 extracts) is extremely limited, if existing at all. The Saugus Formation is confined, with the S-II aquitard (approximately 85 feet thick) providing vertical separation from the Alluvial Aquifer and other shallow groundwater in the area of its deep subsurface capture zones. The top well screen of Well V201 is at approximately 540 feet below ground surface, with an annular seal of 460 feet below ground surface, which means there is a significant vertical distance between the Alluvial Aquifer and the zones from which Well V201 extracts. Furthermore, analysis of each individual site within the two-dimensional footprint of the Well V201 capture zones and their use (Sections 3.3.2 to 3.3.4) did not identify potential adverse impacts to Saugus Formation groundwater. Groundwater monitoring data from Well V201 also does not indicate contributions of COCs from these sites to Well V201. Any Alluvial Aquifer water captured by Well V201 is from distant areas, with long travel times for migration to Well V201 (greater than 15 years).

2. DDW Comment: Please include the concentrations (e.g., starting and current concentrations) in soil and groundwater at and near the contaminated sites in accordance with Section 1.b. Contaminant Assessment of the Process Memo.

SCVWA Response: Section 3.4 of the Report presents the Contaminant Assessment and evaluates sources or potential source facilities located within the two-dimensional footprint of the estimated capture zone and upgradient of Well V201. Three potentially relevant

contaminated sites have been identified, with the Whittaker-Bermite site being the known source of perchlorate contamination and the primary source of TCE contamination detected in Well V201. Initial and recent COC concentration data for soil and groundwater within and near the Whittaker-Bermite site will be added to Section 3 of the revised Report.

3. DDW Comment: Please present a map showing the intersection of the proposed water source capture zones with the contaminated areas and plumes.

SCVWA Response: This map has been prepared and added to Section 3 of the revised Report. The Figure is attached for your review.

4. DDW Comment: Please identify the list of contaminants of concern (COCs) and the potential contaminants of concern for Well V201.

SCVWA Response: Based upon data obtained during operation of Well V201, and summarized in Tables 4-1, 4-2, and 4-4 of the Report, the documented contaminant of concern in Well V201 is perchlorate. Trichloroethene (TCE) was detected at concentrations above the detection limit for reporting (DLR) but less than the maximum contaminant level (MCL) in samples collected during Well V201 operation from 2017 - 2021. TCE is considered a potential contaminant of concern for Well V201.

SCVWA operates two existing Saugus Formation water supply wells, Saugus 1 and Saugus 2, that are located generally upgradient of Well V201. These two wells are permitted and regulated by DDW, subject to conditions including a specified sampling and analysis program, which includes annual analysis of samples for VOCs, synthetic organic compounds (SOCs), metals, other inorganics, explosives, bacteria, and radionuclides, as well as other constituents. In addition, SCVWA expects to continue sampling many, if not all, of its water supply wells for PFOS and PFOA. Finally, SCVWA intends to continue to sample a specified set of sentinel wells for perchlorate and VOCs. SCVWA expects to evaluate data obtained from the regular sampling of these other water supply wells and sentinel wells to identify any additional potential COCs which may be present in Saugus Formation groundwater flowing toward Well V201.

Section 4 of the Report has been revised to clarify this point.

5. DDW Comment: Please include relevant information from the recent containment evaluation to supplement this report.

SCVWA Response: The Containment Evaluation, which addresses groundwater impacted by chemicals released from the Whittaker-Bermite site, has been updated and was submitted to the Department of Toxic Substances Control in October 2022. Although the Containment Evaluation addresses a much larger geographic area than the estimated capture zones for Well V201, the data evaluations and groundwater modeling described in the Containment Evaluation were used in developing the proposed plan for operation of Well V201. Regarding Well V201's operation, the earlier groundwater and recent modeling evaluations provided consistent conclusions. Additional details are presented below.

For the purposes of understanding the conditions that will arise upon returning Well V201 to service, the primary relevant information from the recent (October 2022) Containment

Evaluation is the modeling analysis of projected future groundwater capture, which is presented in Section 6 of that report. Four future scenarios are described in that report: a near-term scenario in which Well V201 returns to service under present-day groundwater pumping rates, and three longer-term scenarios in which Well V201 returns to service and basin-wide groundwater pumping is occurring at higher rates under full build-out conditions for land and water uses in the SCVWA service area as described in the Groundwater Sustainability Plan (GSP) for the basin. The particle-tracking analyses for HSU S-IIIc that were conducted for the recent containment evaluation are particularly useful for showing that the more recent analyses of Well V201 capture are similar to those from the 2013 modeling analyses that are described in the Report. In particular:

- For both the single near-term future scenario and the three long-term future scenarios, Figure 6-40 of the October 2022 Containment Evaluation shows capture zones for Saugus 1 and Saugus 2 that encompass the area along the western boundary of the Whittaker-Bermite site, while the Well V201 capture zones extend to the north, south, and west of Well V201, plus a limited area to the east of Well V201.
- Similarly, Figure 6-45 of the October 2022 Containment Evaluation shows that groundwater at the DW-1 and MP-5 monitoring locations is ultimately captured by Well V201, while groundwater at DW-2 may or may not be captured by Well V201 (depending on how other wells – particularly Well V205 – are being operated).

These modeling interpretations from the October 2022 Containment Evaluation are consistent with Figure 3-1 of the Report and were supported by an in-depth assessment of field data collected in recent years, as presented in Sections 2 through 5 of the Containment Evaluation.

The Containment Evaluation presents data on the long-term trends in water levels, perchlorate, and VOCs in the Saugus Formation. SCVWA will provide the Containment Evaluation report to DDW as a companion document to the revised Report.

6. DDW Comment: Page 3-1, Section 3 of the Report states that the intent of the project is to return Well V201 to service following “installation of a treatment system to remove perchlorate”. Please complete this statement by mentioning Volatile Organic Chemical (VOC) treatment using GAC.

SCVWA Response: The Report has been revised in multiple locations to incorporate the planned unit treatment process to remove VOCs.

7. DDW Comment: Figure 3-1, Section 3.2 shows the estimated capture zone for various years and the potential surface sources of chemical impacts within the footprint of each capture zone. However, not all monitoring wells listed on page 3-5 are shown on Figure 3-1. Please revise this figure or add a new figure showing the location of all listed monitoring wells.

SCVWA Response: Figure 3-1 shows the estimated capture zones associated with operation of Well V201. The text on page 3-5 addresses the larger picture of perchlorate in groundwater. Four of the monitoring wells (i.e., AL-12B, MP-5, SG1-HSU1, and SG1-HSU3) listed on page 3-5 are regularly monitored by SCVWA as part of surveillance well program for the Saugus 1 and 2 water

supply wells. Moreover, these four monitoring wells are not located within the estimated capture zones for Well V201.

However, in response to the request from DDW, a figure displaying the surveillance wells, listed on page 3-5, monitored by SCVWA will be prepared and added to the Report.

8. DDW Comment: Page 3-2, Section 3.2.1 of the Report refers to a “regional groundwater model”. However, it is not clear whether this model has been used for capture zone delineations presented in the Report, such as what is presented on Figure 3-1. Please clarify whether the model development has been completed and used for this Report.

SCVWA Response: The regional groundwater model described in the December 2022 version of the 97-005 Documentation Report for Well V201 was used to generate the capture zones shown on Figure 3-1 of that Report. The technical details of the delineation process are presented in Section 4.3 of Appendix B of the December 2022 97-005 Documentation Report. As appropriate, text and references to Appendices will be included in the revised Report.

9. DDW Comment: Page 3-3, Section 3.2.2 of the Report refers to:

- (a) An update and calibration of the groundwater model that was conducted through the year 2011. Please provide further information on why the calibration was only conducted through 2011 and why more recent data was not used.

SCVWA Response: The groundwater model update and calibration activities were conducted in 2012 and early 2013, before data for all of calendar year 2012 became available. Use of the model to evaluate alternatives for perchlorate containment and V201 operations began in late 2012, and all modeling activities were completed in 2013 (with a report issued in March 2014). The October 2022 Containment Evaluation report (which used more recent data and an updated version of the groundwater flow model) showed comparable results with respect to the groundwater capture zone for Well V201 under its future operations.

- (b) Appendix B, which contains a technical memorandum that describes the details of the modeling work and the findings regarding the evaluation of the model’s calibration quality. Please provide Appendix B.

SCVWA Response: The March 2014 report included in Appendix B provided the details of the predictive modeling work that evaluated alternatives for perchlorate containment and V201 operations. The March 2014 report was previously submitted to DDW. However, an earlier technical memorandum discussing the update of the model, its calibration, and its calibration quality was inadvertently not included in Appendix B. That earlier technical memorandum was prepared by GSI Water Solutions and Luhdorff & Scalmanini Consulting Engineers in December 2013, was previously submitted to DDW, and is added to Appendix B.

10. DDW Comment: Page 3-4, Section 3.2.4 of the Report states that a 20-year capture zone was delineated. However, Figure 3-1 shows a 15-year capture zone instead. Please address the discrepancy.

SCVWA Response: The Report text will be revised to reference a 15-year capture zone.

11. DDW Comment: Please show the location of Well V201 on Figure 3-2, Section 3.3.1.1 of the Report.

SCVWA Response: The purpose of Figure 3-2 was to display areas within the Whittaker-Bermite site that were/are impacted by perchlorate and/or VOCs. In response to the DDW comment, a revised Figure 3-2 will be included in the revised Report.

12. DDW Comment: Section 3.3.1.1 of the Report presents the offsite monitoring wells located downgradient of the Whittaker-Bermite site and nearby impacted Saugus Formation production wells Saugus 1, Saugus 2, and V201. Please provide a table listing the offsite monitoring wells and the estimated time of travel from each monitoring well to Well V201, based on the groundwater modeling results, if available. Please indicate which wells are upgradient and which are downgradient of Well V201.

SCVWA Response: For each of the offsite groundwater monitoring wells discussed in Section 3.3.1.1, the table provided below first identifies; (1) whether groundwater at that monitoring well lies upgradient, downgradient, or cross-gradient from Well V201 under ambient (non-pumping) conditions in the Saugus Formation, and (2) whether water at that monitoring well would be captured by Well V201 under the planned program for returning Well V201 to service. For those wells within the capture influence of Well V201, the table also provides estimates of the groundwater travel time. This information is developed using both Figure 3-1 of the Report and also by considering the interpretations of future groundwater capture that were described in the recent Containment Evaluation report (October 2022), which shows results and interpretations regarding Well V201 capture that are similar to what was described in the March 2014 modeling analysis report. The information summarized below is included in the revised Report.

Monitoring Well	Is this Well Upgradient, Downgradient, or Cross-Gradient of V201 under Ambient (Non-Pumping) Conditions?	Does Groundwater at this Well Flow to V201 When V201 Operates?	Travel Time to V201
AL-12A and -12B	Upgradient	No	---
DW-1A, -1B, -1C	Cross-gradient	Yes	Approx. 7 years
DW-2	Downgradient	Yes, unless V205 is off	More than 15 years
Library A, B, C	Upgradient/ Cross-Gradient	Yes	Approx. 4 years
Mall A, B, C	Downgradient	Yes	Less than 2 years
MP-5 (ports 1, 2, 3, 4)	Cross-Gradient	Yes	More than 15 years for ports 1 and 2, 15 years for ports 3 and 4
SG1-HSU1	Upgradient	No	---
SG1-HSU3 (wells A, B, C)	Upgradient	No	---

13. DDW Comment: Section 3.3.1.1 of the Report refers to Table 6-10, which includes time series graphs of perchlorate concentrations at the monitoring wells through the year 2017. Why was more recent data not used? Please also provide Table 6-10.

SCVWA Response: This is a reference error because there is no Table 6-10 in the Report. Section 3, page 39 of the Report refers to monitoring wells AL-12, DW-1A, B, and C, DW-2, Library A, B, and C, Mall A, B, and C, MP-5 (port 1-5), SG1-HSU1, SG1-HSU3 a, b, and c. The reference to Table 6-10 is removed from the Report.

14. DDW Comment: Please show the location of Well V201 on Figure 3-3, Section 3.3.1.2.

SCVWA Response: In response to the DDW comment, a revised Figure 3-3 will be included in the revised Report.

15. DDW Comment: Page 3-7, Section 3.3.1.2 of the Report states that trichloroethylene (TCE) concentration at AL-12B monitoring well, which is screened in the Alluvial aquifer, ranges up to a maximum of 240 µg/L. However, previous sections allude to the possibility of some vertical movement between the Alluvial and Saugus formations. Please elaborate further on the high concentrations of TCE detected at AL-12B monitoring well and provide information as to if these levels could potentially pose a threat to Well V201.

SCVWA Response: As discussed in the response to Comment #1, an aquitard layer separates the screened intervals of Well V201 from the Alluvial Aquifer and other shallow groundwater zones in the study area, including near AL-12B. Furthermore, AL-12B is located just west of the Whittaker-Bermite site, near the Saugus 1 production well. Saugus 1 is operated continuously in the Saugus Formation. Groundwater in deeper parts of the Saugus Formation (i.e., below the S-II aquitard layer) in the vicinity of AL-12B is being captured by Saugus 1 and would not migrate to Well V201.

16. DDW Comment: Page 3-8, Section 3.3.2 of the Report states that capture zone assessments are “two dimensional aerial assessments only”. However, previous sections seem to suggest that capture zone delineations were based on groundwater modeling. Please clarify the discrepancy.

SCVWA Response: The capture zones were calculated in three dimensions, using the three-dimensional multi-layered numerical groundwater flow model. The capture zones shown on Figure 3-1 are two-dimensional projections (in map view) of the three-dimensional capture zones that were delineated using the model. SCVWA will clarify this two-dimensional presentation of the three-dimensional capture zones in the revised Report in Section 3.3.2.

17. DDW Comment: Page 3-20, Section 3.4.1.2 of the Report refers to the remedial investigation for the Whittaker-Bermite site. For the groundwater samples collected during the remedial investigation, please provide the list of:

- (a) the fifteen inorganic compounds at concentrations exceeding the primary or secondary maximum contaminant levels (MCLs).
- (b) the eleven VOCs detected at concentrations exceeding their respective MCLs.

SCVWA Response: This list is updated in the revised Report in Section 3.4.1.2.

18. DDW Comment: Page 1-3, Section 1.3 of the Report acknowledges that the actual extent of the perchlorate plume has not been delineated and remains undefined. Page 3-20, Section 3.4.1.2 of the Report also agrees with CH2M Hill that VOCs in the Saugus Formation had not been adequately characterized and identified additional areas for investigation. What is currently being done to evaluate the offsite perchlorate and VOC plume boundaries?

SCVWA Response: On July 14, 2023, DTSC issued a letter to Whittaker that requires additional action to delineate the extent of the COC plume in offsite groundwater. DTSC directed Whittaker to submit a work plan regarding the proposed installation of an estimated 16 additional groundwater monitoring wells for the purpose of COC plume delineation. DTSC also directed Whittaker to expand and increase its onsite remedial measures for groundwater. The Whittaker work plan is due to DTSC by mid-October 2023.

Although the delineation of the COC plume boundaries is incomplete, the COC distribution within the capture zone of Well V201 is sufficiently well-characterized for the purposes of treatment system design. Perchlorate concentrations measured in the most recent years of Well V201 operation were relatively steady (Figure 4-1). The DW-1, Library, Mall, and MP-5 monitoring wells are located within the estimated hydraulic capture zone or are near Well V201. Perchlorate concentrations in these monitoring wells have ranged from non-detect to 83 micrograms per liter ($\mu\text{g/L}$) (in Library Well B). Although perchlorate concentrations have fluctuated at some locations, they have been stable at most locations, indicating that the perchlorate concentration at Well V201 should also remain relatively stable when the well is returned to service for water supply. Monitoring these wells will continue to predict future perchlorate concentration trends in Well V201.

19. DDW Comment: Section 4 of the Report must have a table with the final estimated design concentrations for the constituents of concern at the treatment plant influent in addition to discussions on the projection of concentrations over time, uncertainty in the data used for making the estimations, and safety factors applied to these concentrations to address the uncertainties. Please refer to Process Memo on the full characterization of raw water quality.

SCVWA Response: A table will be added to Section 4 of the Report to summarize the water quality constituents in the raw water pumped from Well V201. The table will summarize the basis of treatment system design and will include statistics for cations, anions, contaminants, aggregate properties, solids, and metals based on monitoring data from 2010 (when perchlorate was first detected in Well V201) to 2021. The treatment system basis of design is the 90th percentile of concentrations of perchlorate and TCE measured at Well V201 over the period of 2010 to 2021. For perchlorate, the treatment system design concentration is 15 $\mu\text{g/L}$ versus an average concentration of 8.3 $\mu\text{g/L}$, providing a significant safety factor.

Based on the design criteria and perchlorate concentrations, the ion exchange resin for is anticipated to require change-out approximately every 12 months. The ion exchange treatment system can remove higher perchlorate concentrations with more frequent change-out of resin, adding significant operational flexibility and safety margin. If perchlorate concentrations in Well V201 increase in the future, the only modification would be the increased frequency of the single-pass ion exchange resin replacement. Similarly, if TCE concentrations increase in

groundwater pumped from Well V201, more frequent replacement of the spent GAC can be performed to address the higher concentrations. The frequency of GAC replacement will be determined through sampling during operation of Well V201.

Perchlorate concentrations measured in the most recent years of well operation were relatively steady (Figure 4-1). The DW-1, Library, Mall, and MP-5 monitoring wells are located within the estimated hydraulic capture zone or are near Well V201. The monitoring wells are screened over much shorter intervals than the production wells and may be intercepting thin zones of groundwater with higher contaminant concentrations. Perchlorate concentrations in these wells have ranged from non-detect to 83 µg/L (in the Library B well). Although perchlorate concentrations have fluctuated at some locations, they have been stable or within historical ranges at nearly all locations. One exception is Mall A well, where perchlorate concentrations increased until 2021 and have since been decreasing. Taken together, concentration trends indicate that the perchlorate concentration at Well V201 should also remain relatively stable when the well is returned to service for water supply. Monitoring of these wells will continue to predict future perchlorate and VOC concentration trends in Well V201.

As allowed by available data, a description will be added to the revised Report regarding the extent to which constituent concentrations in Well V201 are influenced by seasonality, groundwater elevations, and pumping rate.

Additional potential contaminants associated with the contaminating activities will be listed in the table created in response to DDW Comment #2. The source of the contamination (i.e., the Whittaker-Bermite site) is located a significant distance outside the 15-year capture zone for Well V201, so these additional contaminants are not anticipated to reach Well V201 within the next 15 years. Groundwater in the intervening distance is routinely monitored with multiple groundwater wells. Furthermore, there are two Saugus Formation groundwater extraction systems which each provide some degree of contaminant capture and removal (i.e., Whittaker's onsite Saugus Formation extraction wells, and SCVWA's Saugus 1 and 2 water supply wells) located between the Whittaker-Bermite site, and Well V201.

20. DDW Comment: Please revise Table 4-1, Section 4.5.1 of the Report by color coding it to highlight the detected constituents as well as constituents that have an exceedance of MCLs or notification levels (NLs).

SCVWA Response: Table 4-1 has been revised to include color coding, relative to the most recent MCLs and NLs issued by DDW. Constituents with NLs, PHGs, and MCLs were added to the list.

21. DDW Comment: Page 4-8, Section 4.10 of the Report states that fourteen per- and polyfluoroalkyl substances (PFAS) were sampled from Well V201 in August 2019 and analyzed using EPA Method 537. PFAS sampling needs to be repeated using EPA Method 533.

SCVWA Response: The samples collected from Well V201 in 2019 were submitted to Eurofins/Eaton Analytical for analysis of PFAS using the (then) required USEPA Method 537. In 2023, the required analytical method for drinking water was revised to USEPA Method 533. In the future, samples collected from Well V201 will be analyzed for PFAS using EPA Method 533, or

other required EPA Method. The resulting data will be compared with MCLs and NLs, where available.

22. DDW Comment: It is not clear whether Table 4-2, Section 4.5.2 of the Report includes all constituents with MCLs and NLs. Please clarify what specific suite of chemicals was monitored in this period.

SCVWA Response: Table 4-2 presents data from two sampling events performed for Well V201 between August and November 2017 as pumping of the well resumed following a hiatus in operation for several years. Some water quality constituents that currently have MCLs and NLs were not sampled and analyzed in 2017. An updated version of Table 4-2, with current MCLs and NLs for the constituents analyzed in 2017, is included in the revised Report.

23. DDW Comment: Please add information to Section 5 of the Report on which staff or what roles within the agency will be designated as the liaisons tasked with monitoring and coordinating with the other agencies involved with the source protection permits and activities.

SCVWA Response:

The SCVWA Director of Operations along with staff including Water System Supervisor, Water Quality Specialists, and Water System Technicians are responsible for performing the required water quality monitoring of SCVWA groundwater supply and monitoring wells. The SCVWA Director of Water Resources and Water Resource Planners will coordinate with other agencies regarding planned development activities that could potentially impact the local water supply.

In accordance with the 2007 Settlement Agreement, monthly technical meetings are conducted to discuss, monitor, and track the progress of onsite contaminant removal and treatment activities, potable groundwater treatment, trends in plume migration and other activities associated with the Whittaker-Bermite property. SCVWA staff from the Engineering Services Section, Water Resources Section, Operations Section, representatives from the Whittaker-Bermite responsible parties, and staff from the Department of Toxic Substances Control and Division of Drinking Water regulatory agencies are all in attendance at these meetings.

Section 5 of the Report will be updated to identify the SCVWA staff responsible for water quality monitoring and local coordination to maintain a safe local water supply.

24. DDW Comment: Sections 6.1.3 and 6.2.2 of the Report provide information on the operation of perchlorate treatment using ion exchange. Please elaborate on how the entire treatment system shuts down and restarts when the exhausted resin from the lead IX vessel needs to be changed out.

SCVWA Response: The information summarized below has been added to Section 6.2.2 of the Report.

- Operational and monitoring guidelines include the following:
- All water produced from SCVWA's Well V201 will be treated with ion exchange (IX) to remove perchlorate.
- SCVWA's target for the Well V201 treatment facility is to treat the flow of groundwater so that perchlorate concentration remains below the current DLR of 2 µg/L for

perchlorate. Note, SCVWA understands that the DLR will be lowered for perchlorate, effective on January 1, 2024.

- The effluent water treated by the IX Treatment System for perchlorate removal at V201 will be continuously and reliably chlorinated. The target disinfectant residual is 3.0 - 3.5 milligrams per liter (mg/L) as total chlorine but may be adjusted. The system will be monitored through the SCVWA SCADA system and SCVWA operators will ensure a minimum disinfectant residual of 1.0 mg/L and a maximum of 4.0 mg/L total chlorine from the treated effluent (finished water) is achieved at all times. Total chlorine concentrations will be tested daily at the Well V201 Disinfection Facility and continuously from an online chlorine analyzer communicating via SCADA.
- The IX system will be operated and monitored according to the manufacturer's specifications.
- The IX resin will be scheduled for replacement in the lead vessel when the effluent perchlorate concentration reaches the MCL of 6 µg/L. During an individual change, the lead vessel will be taken offline, and new resin will be loaded into the vessel. The vessel containing the new resin will be placed in the lag (polishing) position. Valving will be adjusted so that the former lag vessel will take the lead position. This approach ensures that the newest IX resin is always in the lag (polishing) position.
- Water quality must be monitored in the raw influent water and the treated effluent water on a routine basis. The proposed monitoring plan is provided in Table 6-2.
- A detailed plan regarding total coliform (TC) and heterotrophic plate count (HPC) monitoring is outlined in the Monitoring and Action Plan for Positive TC and High HPC Sample Results in the Operations Maintenance Manual Plan (OMMP).
- Operational records will be submitted to the DDW by the 25th day of each month. These records will include analytical results, flow rates, total treated volume, chlorine residual measurements, bacteriological sampling results, operational modifications (if applicable), and any occurrence considered out of the ordinary.
- All water treatment plant operators will be certified in accordance with the regulations relating to certification of water treatment facility operation per California Code of Regulations, Title 22, Division 4, Chapter 13.

25. DDW Comment: Page 6-4, Section 6.2.3 of the Report states that after two consecutive detections of VOCs at the 50% sample port the GAC change-out is triggered.

(a) Please provide supporting data to demonstrate whether the proposed GAC change-out criteria will be able to meet SCVWA's VOC treatment goal.

SCVWA Response: The available monitoring data from Well V201 indicates that TCE is the only VOC that has been detected at concentrations above the DLR in samples of untreated groundwater from Well V201. The detected concentration of TCE in the untreated groundwater has typically been less than 1 µg/L, and has not exceeded the drinking water MCL of 5 µg/L. It is anticipated that when VOCs (TCE) are detected at concentrations above the DLR in the 50% sample port, the GAC above the 50% sample port will continue to remove TCE for a period of time similar to the time period between system start-up and detection of TCE in the 50% sample port. As samples are collected and analyzed during full-time operation of the treatment system, the actual performance of the GAC can be evaluated and then the system-specific longevity of

the GAC can be better predicted. Each pre-approved GAC vendor will provide throughput curves that describe the anticipated approximate bed volume longevity of the GAC based upon the water quality data from V201. By using the 50% sample port as a trigger to schedule a GAC change out, SCVWA provides the safeguard that 50% of the GAC media above the sample port is not exhausted and therefore no detections of VOCs (TCE) should occur in the treated ion exchange effluent.

- (b) Once the supporting data is provided and reviewed by the Division, please note that after the first detection at the 50% port, the sampling frequency may be increased from monthly to weekly, and if detected again, the media change-out must be triggered. The information provided in footnote (d) of Table 6-2 may need to be changed as well.

SCVWA Response: SCVWA will collect monthly samples at the 50% sample port and at the lag ion exchange vessel. Once the 50% sample port has a VOC detection above the DLR, SCVWA will increase the monitoring frequency from monthly to weekly. The footnote in Table 6-2 of the Report has been revised to increase the frequency of monitoring from monthly to weekly once the TCE concentration at the 50% sample port is greater than the DLR. Laboratory turnaround time for VOC analysis is approximately one week.

- (c) Please provide information on how long it will take from the second detection at the 50% sample port and the new media being installed.

SCVWA Response: Once a second positive detection is confirmed, SCVWA will contact the list of pre-approved GAC vendors and will use a vendor that is able to provide replacement GAC within 2-3 weeks. Because the GAC will be approximately 50% spent, or exhausted, the remaining unused GAC is expected to remove TCE during the time interval between the second detection in the 50% sample port and completion of the GAC change out.

- (d) Please provide contingency planning in case the media change-out takes longer than the anticipated turnaround time. What actions will be taken by the agency?

SCVWA Response: As part of its contingency planning, SCVWA plans to retain multiple GAC vendors that can be utilized in the event that one or more vendors cannot meet the 2-3 weeks anticipated schedule between order placement and GAC replacement. In addition, VOC samples will be collected on a weekly basis from the lag ion exchange vessel (during triggered monitoring of the VOC removal process), which will provide data to confirm that the water entering the distribution system maintains VOC concentrations below the DLR of 0.5 µg/L. The effluent from the lag ion exchange vessel is a combined flow from both GAC vessels and is representative of the finished treated water prior to disinfection. Following replacement of the GAC, the sampling frequency will revert to the original schedule.

The anticipated operating and management procedures summarized above are included in Section 6 of the revised Report.

26. DDW Comment: Section 6.8 and Table 6-9, Section 6.8:

- (a) As a supplemental table to Table 6-9, please include the complete list of constituents and analytical methods used for surveillance well monitoring.

SCVWA Response: A list, titled Surveillance Monitoring Wells EPA Methods, and List of Analytes, has been prepared and is included in Section 6 of the revised Report.

(b) Please also add tentative identified compounds (TIC) analysis for VOCs and semi-volatile organic compounds (SVOCs) at an annual frequency.

SCVWA Response: The monitoring plan for Well V201 during its future operation will include the annual collection and analysis of raw water samples for TICs and SVOCs. A table has been prepared to identify and document TICs in samples collected from Well V201 during its future operation. This table is included in Section 6 of the revised Report.

(c) Please include the potential COCs in the proposed monitoring plan.

SCVWA Response: Based upon years of monitoring and analyzing a robust historical database for any potential trends, the identified COC for Well V201 is perchlorate, with TCE identified as a potential COC. Although, TCE has been detected above the DLR, it has never exceeded the MCL of 5 µg/L in groundwater pumped from Well V201. Future routine monitoring of Well V201 and the designated surveillance wells will evaluate whether there is a new potential COC that has not yet been identified.

(d) The footnote (b) of Table 6-9 is referring to Appendix C which seems to be a typo.

SCVWA Response: The footnote in Table 6-9 of the revised Report has been edited to remove the reference to Appendix C.

27. DDW Comment: Section 6-9 seems to be a better fit for Section 5 of the Report.

SCVWA Response: Relocation of the current Section 6-9 will be considered in revising the Report.

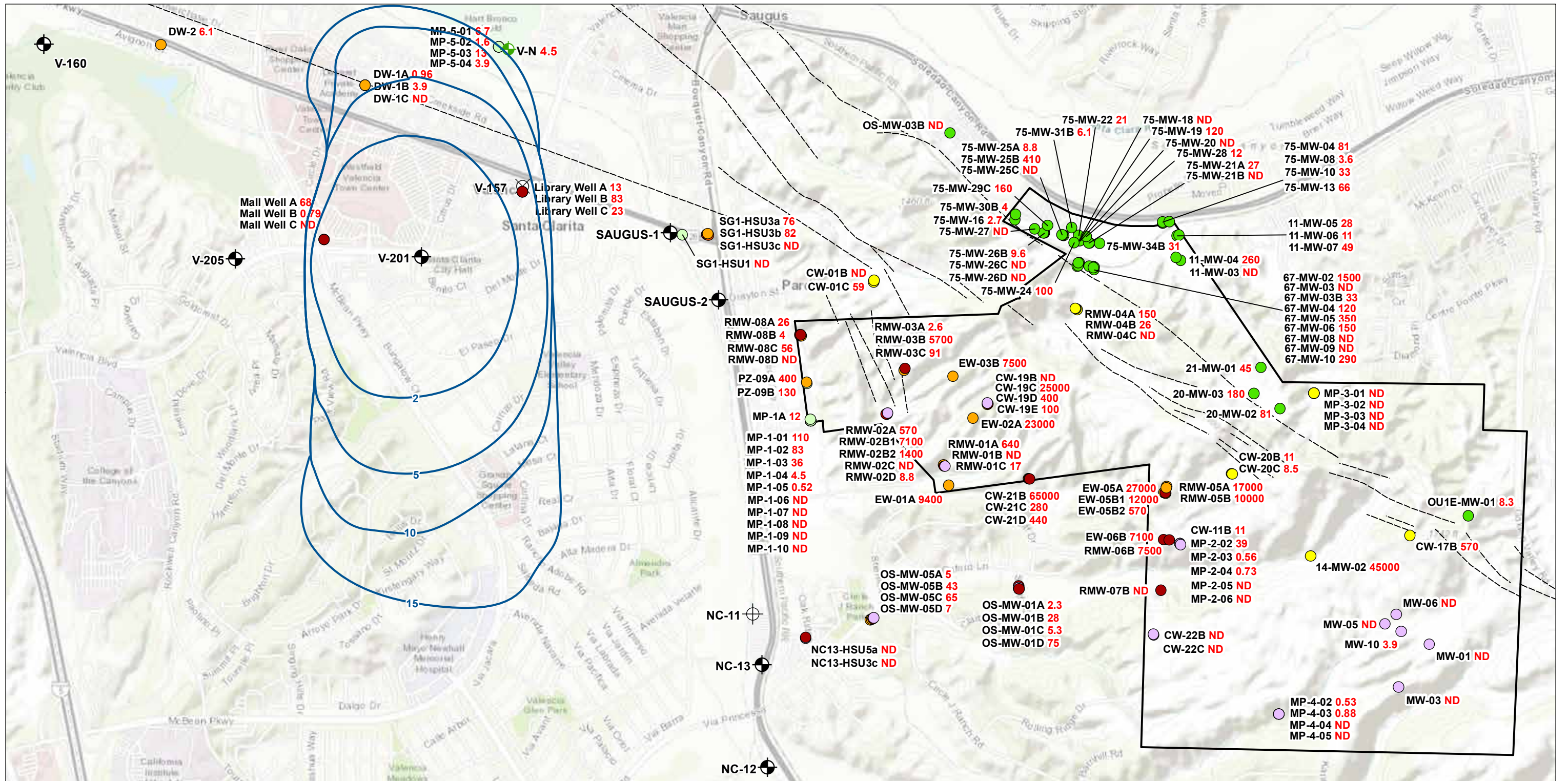
28. DDW Comment: Page 7-2, Section 7.3 of the Report refers to constituents such as vanadium and boron as acute, which is incorrect. Please replace acute with chronic, non-cancer.

SCVWA Response: Table 7-1 is accurate. The text in Section 7 of the Report has been updated to be consistent with Table 7-1.

29. DDW Comment: Section 7.5 and Table 7-1 of the Report refers to the MCL-equivalent calculations. If the project is designed for GAC to remove TCE to below the detection limit for reporting (DLR) level, then the maximum TCE concentration listed in Table 7-1 must be non-detect (ND, or zero) and the sum of the MCL-equivalents for chronic carcinogenic contaminants would be 0.6. Please explain why a TCE concentration of 1.3 µg/L is used in the current calculations.

SCVWA Response: When the Report was submitted to DDW in December 2022, treatment to remove VOCs using GAC was not included in the planned Well V201 wellhead treatment system and therefore, VOCs were included in the MCL-equivalent calculations. Since December 2022, SCVWA has decided to include a GAC treatment process to provide VOC removal at Well V201. Therefore, the MCL-equivalent calculations have been updated to remove VOCs and is included in Section 7 of the revised Report.

Comment #3



LEGEND

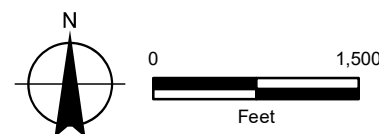
- Saugus Production Wells
- Alluvial/Saugus Production Well
- Saugus S-III
- Saugus S-Va
- Inactive Well
- Saugus
- Saugus S-IIIa
- Saugus S-Vc
- Destroyed Well
- Saugus S-I
- Saugus S-IIIb
- Saugus S-VII
- Saugus S-IIIc
- Former Whittaker-Bermite Facility
- Capture Zone with Travel Time in Years

NOTE

Onsite Whittaker monitoring well concentration values are from May-June 2019.

FIGURE X

Well V201 Capture Zones and May-June 2021 Perchlorate Concentrations in All Saugus Formation HSUs
 Subtitle



Comment #20

Table 4-1: Summary of Water Quality for Valencia Water Division Well V201 (1989- April 2021)

	Well V201 ¹						Maximum Contaminant Level (MCL), Secondary MCL, Detection limits for reporting (DLR), Public Health Goal (PHG), Notification Level (NL)						US EPA Priority Pollutants ⁴ Prop 65 ⁵	
	Method	Samples	Average	Median	Max	Min	Units	MCL/ RL	SMCL	DLR	PHG (as of Aug. 2023) ^{2,3}	Date of PHG		NL mg/L
GENERAL PHYSICAL														
COLOR	SM 2120B	35	3.69	<5	100.00	<3	Units		15	3				
ODOR THRESHOLD @ 60 C	EPA 140.1	41	1.00	1	2.00	<1	TON		3	1				
PH, LABORATORY	SM 4500H+-B	37	7.60	7.60	8.20	7.33	Units							
SOURCE TEMPERATURE, C		1	17.00	17	17.00	17	C							
SPECIFIC CONDUCTANCE	SM 2510B	61	1179.00	1200.00	1600.00	710.00	µmhos/cm		900	2				
TOTAL DISSOLVED SOLIDS	SM 2540C	48	856.00	820.00	1200.00	590	mg/L		500	5				
TURBIDITY, LABORATORY	EPA 180.1	39	5.65	0.35	190.00	<0.1	NTU	TT	5	0.1				
PH, FIELD		1	7.50	7.50	7.50	7.50	Units							
MAJOR CATIONS														
CALCIUM	EPA 200.7	41	156.00	160.00	221.00	88.00	mg/L			1				
MAGNESIUM	EPA 200.7	41	44.90	45.00	63.00	25.60	mg/L			1				
POTASSIUM	EPA 200.7	28	2.95	2.90	4.70	0.9	mg/L			1				
SODIUM	EPA 200.7	41	68.70	68.00	98.00	54.50	mg/L			1				
MAJOR ANIONS														
ALKALINITY (TOTAL) as CaCO ₃	SM 2320B	38	222.40	212.5	620.00	187.00	mg/L			5				
BICARBONATE ALKALINITY	SM 2320B	25	273.80	250.00	760.00	228.00	mg/L			5				
SULFATE	EPA 300.0	120	388.14	370.00	600.00	4.00	mg/L		250	0.5				
CHLORIDE	EPA 300.0	46	33.70	33.05	56.00	23.90	mg/L		250	1				
NITRATE (as NO ₃)		27	16.18	15.00	24.60	10.10	mg/L	40		2				
INORGANICS														
LANGELIER INDEX AT SOURCE TEMP.		1	0.25	0.25	0.25	0.25								
ASBESTOS	EPA 100.2	13	<0.2	0.20	0.20	<0.2	MFL	7		0.2	7	2003	Yes	Yes
NITRATE + NITRITE (as N)	EPA 353.2	22	3.50	3.80	4.20	2.40	mg/L	10			10	2018		
NITRITE (as N)	EPA 353.2	11	<0.400	<0.400	<0.400	<0.400	mg/L	1		0.4	1	2018		
CARBONATE ALKALINITY	SM 2320B	25	<1	<1	3.90	<1	mg/L			5				
HYDROXIDE ALKALINITY	SM 2320B	25	<1	<1	<1	<1	mg/L			5				
HARDNESS (TOTAL) as CaCO ₃	EPA 200.7	39	584.00	615.00	811.00	340	mg/L			5				
CYANIDE	EPA 335.4	6	<0.100	<0.100	<0.100	<0.100	mg/L	0.15		0.1	0.15	1997	Yes	
FLUORIDE (F) (NATURAL-SOURCE)	EPA 300.0	24	0.41	0.40	0.90	0.25	mg/L	2	2	0.1	1	1997		
FOAMING AGENTS (MBAS)	SM 5540C	20	<0.05	<0.05	<0.086	<0.02	mg/L		0.5	0.1				
AGGRESSIVE INDEX (CORROSIVITY)	AWWA	17	13.00	13.00	13.40	12.3	N/A							
LANGELIER INDEX @ 60 C	SM 2330B	26	1.38	1.40	1.82	0.4	N/A							
PERCHLORATE	EPA 314.0	277	0.01	0.01	0.02	<4	mg/L	0.006		0.002	0.001	2015		
CARBON DISULFIDE		219	<0.0005	<0.0005	<0.0005	<0.0005								
METALS														
ALUMINUM	EPA 200.8	25	0.200	<DLR	4.800	<DLR	mg/L	1	0.2	0.05	0.6	2001		
ANTIMONY	EPA 200.8	21	<DLR	<DLR	<DLR	<DLR	mg/L	0.006		0.006	0.001	2016	Yes	
ARSENIC	EPA 200.8	24	<DLR	<DLR	0.006	<DLR	mg/L	0.01		0.002	0.000004	2004	Yes	Yes

Table 4-1: Summary of Water Quality for Valencia Water Division Well V201 (1989- April 2021)

	Well V201 ¹							Maximum Contaminant Level (MCL), Secondary MCL, Detection limits for reporting (DLR), Public Health Goal (PHG), Notification Level (NL)					US EPA Priority Pollutants ⁴	Prop 65 ⁵	
	Method	Samples	Average	Median	Max	Min	Units	MCL/ RL	SMCL	DLR	PHG (as of Aug. 2023) ^{2,3}	Date of PHG			NL mg/L
BARIUM	EPA 200.8	25	<DLR	<DLR	0.024	<DLR	mg/L	1		0.1	2	2003			
BERYLLIUM	EPA 200.8	22	<DLR	<DLR	<DLR	<DLR	mg/L	0.004		0.001	0.001	2003		Yes	
BORON	EPA 200.8	14	292	290	350	250	mg/L			0.1			1		
CADMIUM	EPA 200.8	25	<DLR	<DLR	<DLR	<DLR	mg/L	0.005		0.001	0.00004	2006		Yes	
CHROMIUM (TOTAL)	EPA 200.8	26	<DLR	<DLR	0.03	<DLR	mg/L	0.05		0.01				Yes	
CHROMIUM, HEXAVALENT	EPA 218.6	11	1.16	1.15	1.40	1.00	mg/L			0.001	0.00002	2011		Yes	
COPPER	EPA 200.8	25	<DLR	<DLR	<DLR	<DLR	mg/L	1.3	1	<DLR	0.3	2008		Yes	
IRON	EPA 200.7	25	1.16	0.00	29.00	0.00	mg/L		0.3	0.1					
LEAD	EPA 200.8	17	<DLR	<DLR	<DLR	<DLR	mg/L	0.015		0.005	0.0002	2009		Yes	
MANGANESE	EPA 200.8	27	0.33	<DLR	<DLR	<DLR	<DLR		0.05	0.02			0.5		
MERCURY	EPA 245.1	20	<DLR	<DLR	<DLR	<DLR	mg/L	0.002		0.001	0.0012	2005		Yes	
NICKEL	EPA 200.8	22	<DLR	<DLR	0.012	<DLR	mg/L	0.1		0.01	0.012	2001		Yes	
SELENIUM	EPA 200.8	24	0.001	<DLR	0.007	<DLR	mg/L	0.05		0.005	0.03	2010		Yes	
SILVER	EPA 200.8	24	<DLR	<DLR	<DLR	<DLR	mg/L		0.1	0.01				Yes	
THALLIUM	EPA 200.8	21	<DLR	<DLR	<DLR	<DLR	mg/L	0.002		0.001	0.0001	2004		Yes	
VANADIUM	EPA 200.8	2	0.007	0.007	0.008	0.006	mg/L			0.003			0.05		
ZINC	EPA 200.8	25	<DLR	<DLR	<DLR	<DLR	mg/L		5	0.02				Yes	
BTEX AND FUEL OXYGENATES															
M-XYLENE	EPA 524.2	2	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005					
BENZENE	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.001		0.0005	0.00015	2001		Yes	
TOLUENE	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.15		0.0005	0.15	1999		Yes	
ETHYLBENZENE	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.3		0.0005	0.3	1997		Yes	
M,P-XYLENE	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	1.75		0.0005	1.8	1997			
O-XYLENE	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	1.75		0.0005	1.8	1997			
P-XYLENE	EPA 524.2	2	<DLR	<DLR	<DLR	<DLR	mg/L	1.75		0.0005	1.8	1997			
XYLENES (TOTAL)	EPA 524.2	41	<DLR	<DLR	<DLR	<DLR	mg/L	1.75		0.0005	1.8	1997			
METHYL TERT-BUTYL ETHER (MTBE)	EPA 524.2	190	<DLR	<DLR	<DLR	<DLR	mg/L	0.013	0.005	0.003	0.013	1999			
TERT-AMYL-METHYL ETHER	EPA 524.2	26	<DLR	<DLR	<DLR	<DLR	mg/L			0.003					
ETHYL TERT-BUTYL ETHER	EPA 524.2	25	<DLR	<DLR	<DLR	<DLR	mg/L			0.003					
TRIALOMETHANES															
BROMODICHLOROMETHANE (THM)	EPA 524.2	189	<DLR	<DLR	<DLR	<DLR	mg/L			0.001				Yes	
BROMOFORM (THM)	EPA 524.2	189	<DLR	<DLR	0.002	<DLR	mg/L			0.001				Yes	
CHLOROFORM (THM)	EPA 524.2	189	<DLR	<DLR	0.001	<DLR	mg/L			0.001				Yes	
DIBROMOCHLOROMETHANE (THM)	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.001					
TOTAL TRIHALOMETHANES	EPA 524.2	189	<DLR	<DLR	0.003	<DLR	mg/L	0.08							
RADIONUCLIDES															
COMBINED RA 226 + RA 228		2	0.22	0.22	0.34	0.10	pCi/L								
GROSS ALPHA	EPA 900.0	32	<DLR	<DLR	5.60	<DLR	pCi/L	15		3		n/a			
GROSS BETA	EPA 900.0	15	<DLR	<DLR	7.40	<DLR	pCi/L	50		4					
RADIUM 226	EPA 903.1	2	2.65	2.65	4.50	<DLR	pCi/L			1	0.05	2006			

Table 4-1: Summary of Water Quality for Valencia Water Division Well V201 (1989- April 2021)

	Method	Well V201 ¹						Maximum Contaminant Level (MCL), Secondary MCL, Detection limits for reporting (DLR), Public Health Goal (PHG), Notification Level (NL)					US EPA Priority Pollutants ⁴	Prop 65 ⁵	
		Samples	Average	Median	Max	Min	Units	MCL/ RL	SMCL	DLR	PHG (as of Aug. 2023) ^{2/3}	Date of PHG			NL mg/L
RADIUM 228	EPA Ra-05	4	<DLR	<DLR	<DLR	<DLR	pCi/L			1	0.019	2006			
STRONTIUM-90	EPA E905.0	23	<DLR	<DLR	<DLR	<DLR	pCi/L	8		2	0.35	2006			
TRITIUM	EPA 906.0	10	<DLR	<DLR	<DLR	<DLR	pCi/L	20,000		1,000	400	2006			
URANIUM (PCI/L)	EPA 200.8	14	4.42	4.30	6.00	1.00	pCi/L	20		1	0.43	2001			
URANIUM (UG/L)	EPA 200.8	2	6.30	6.30	6.40	6.20	mg/L			1					
VOLATILE ORGANICS															
1,1,1,2-TETRACHLOROETHANE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L	0.2		0.0005					
1,1,1-TRICHLOROETHANE (1,1,1-TCA)	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.2		0.0005	1	2006	Yes		
1,1,2,2-TETRACHLOROETHANE	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.001		0.0005	0.0001	2003	Yes	Yes	
1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE (FREON 113)	EPA 524.2	154	<DLR	<DLR	<DLR	<DLR	mg/L	1.2		0.01	4	2011			
1,1,2-TRICHLOROETHANE (1,1,2-TCA)	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.005		0.0005	0.0003	2006	Yes		
1,1-DICHLOROETHANE (1,1-DCA)	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.005		0.0005	0.003	2003	Yes	Yes	
1,1-DICHLOROETHYLENE (1,1-DCE)	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.006		0.0005	0.01	1999	Yes		
1,1-DICHLOROPROPENE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005					
1,2,3-TRICHLOROBENZENE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005					
1,2,4-TRICHLOROBENZENE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L	0.005		0.0005	0.005	1999	Yes		
1,2,3-TRICHLOROPROPANE (1,2,3-TCP)	EPA 524.2	21	<DLR	<DLR	<DLR	<DLR	mg/L	0.005		0.005	0.0007	2009			
1,2,4-TRIMETHYLBENZENE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005					
1,2-DICHLOROBENZENE	EPA 524.2	194	<DLR	<DLR	<DLR	<DLR	mg/L	0.6		0.0005	0.6	1997	Yes		
1,2-DICHLOROETHANE (1,2-DCA)	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.0005		0.0005	0.0004	1999-a	Yes		
1,2-DICHLOROPROPANE	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.005		0.0005	0.0005	1999	Yes	Yes	
1,3,5-TRIMETHYLBENZENE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005				0.33	
1,3-DICHLOROBENZENE	EPA 524.2	187	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005			Yes		
1,3-DICHLOROPROPANE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L	0.0005		0.0005	0.0002	1999-c			
1,3-DICHLOROPROPENE (TOTAL)	EPA 524.2	40	<DLR	<DLR	<DLR	<DLR	mg/L	0.2		0.0005			Yes		
1,4-DICHLOROBENZENE	EPA 524.2	194	<DLR	<DLR	<DLR	<DLR	mg/L	0.005		0.0005	0.006	1997	Yes		
1-PHENYLPROPANE (N-PROPYLBENZENE)	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005				0.26	
2,2-DICHLOROPROPANE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005					
2-CHLOROTOLUENE	EPA 524.2	187	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005				0.14	
4-CHLOROTOLUENE	EPA 524.2	187	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005				0.14	
BROMOBENZENE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005					
BROMOCHLOROMETHANE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005					
BROMOMETHANE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005			Yes	Yes	
CARBON TETRACHLORIDE	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.0005		0.0005	0.0001	2000	Yes	Yes	
CHLOROETHANE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005			Yes	Yes	
CHLOROMETHANE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005			Yes		
CIS-1,2-DICHLOROETHYLENE	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.006		0.0005	0.1	2006			
CIS-1,3-DICHLOROPROPENE	EPA 524.2	176	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005					
DIBROMOMETHANE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L	0.005		0.0005	0.004	2000			
ETHYLENE DIBROMIDE (EDB)	EPA 524.2	5	<DLR	<DLR	<DLR	<DLR	mg/L	0.00005		0.00002	0.00001	2003			

Table 4-1: Summary of Water Quality for Valencia Water Division Well V201 (1989- April 2021)

	Method	Well V201 ¹						Maximum Contaminant Level (MCL), Secondary MCL, Detection limits for reporting (DLR), Public Health Goal (PHG), Notification Level (NL)						US EPA Priority Pollutants ⁴	Prop 65 ⁵	
		Samples	Average	Median	Max	Min	Units	MCL/ RL	SMCL	DLR	PHG (as of Aug. 2023) ^{2/3}	Date of PHG	NL mg/L			
DICHLORODIFLUOROMETHANE (FREON 12)	EPA 524.2	190	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005			1			
DICHLOROMETHANE	EPA 524.2	42	<DLR	<DLR	0.0019	<DLR	mg/L			0.0005				Yes	yes	
METHYL ETHYL KETONE	EPA 524.2	27	<DLR	<DLR	<DLR	<DLR	mg/L			0.005			0.12			
METHYL ISOBUTYL KETONE	EPA 524.2	27	<DLR	<DLR	<DLR	<DLR	mg/L			0.005						
MONOCHLOROBENZENE	EPA 524.2	41	<DLR	<DLR	<DLR	<DLR	mg/L	0.07		0.0007	0.2	2003				
N-BUTYLBENZENE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005			0.26			
STYRENE	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.1		0.0005	0.0005	2010				
TETRACHLOROETHYLENE (PCE)	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.005		0.0005	0.00006	2001		Yes	Yes	
TRANS-1,2-DICHLOROETHYLENE	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.01		0.0005	0.06	2006				
TRANS-1,3-DICHLOROPROPENE	EPA 524.2	176	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005						
TRICHLOROETHYLENE (TCE)	EPA 524.2	195	0.003	<DLR	0.001	<DLR	mg/L	0.005		0.0005	0.0017	2009		Yes	Yes	
TRICHLOROFLUOROMETHANE (Freon 11)	EPA 524.2	153	<DLR	<DLR	<DLR	<DLR	mg/L	0.15		0.005	1.3	2014				
VINYL CHLORIDE	EPA 524.2	195	<DLR	<DLR	<DLR	<DLR	mg/L	0.0005		0.0005	0.00005	2000		Yes	Yes	
SEMI-VOLATILE ORGANICS																
1,4-DIOXANE	EPA 8270M	11	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005			0.003		Yes	
2-CHLOROETHYL VINYL ETHER	EPA 524.2	4	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005				Yes		
DI(2-ETHYLHEXYL)ADIPATE	EPA 525.2	13	<DLR	<DLR	<DLR	<DLR	mg/L	0.4		0.005	0.2	2003				
DI(2-ETHYLHEXYL)PHTHALATE (DEHP)	EPA 525.2	16	<DLR	<DLR	<DLR	<DLR	mg/L	0.004		0.003	0.012	1997			Yes	
DIISOPROPYL ETHER	EPA 524.2	26	<DLR	<DLR	<DLR	<DLR	mg/L			0.003						
EPTC	EPA 525.2	12	<DLR	<DLR	<DLR	<DLR	mg/L	0.0002		0.0001						
HEXACHLOROBENZENE	EPA 508	16	<DLR	<DLR	<DLR	<DLR	mg/L	0.001		0.0005	0.00003	2003		Yes	Yes	
HEXACHLOROBUTADIENE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005				Yes		
HEXACHLOROCYCLOPENTADIENE	EPA 508	16	<DLR	<DLR	<DLR	<DLR	mg/L	0.05		0.001	0.002	2014		Yes		
ISOPROPYLBENZENE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005			0.77			
NAPHTHALENE	EPA 525.2	190	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005			0.017	Yes	Yes	
PENTACHLOROPHENOL	EPA 515.3	5	<DLR	<DLR	<DLR	<DLR	mg/L	0.001		0.0002	0.0003	2009		Yes	Yes	
P-ISOPROPYLTOLUENE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005						
SEC-BUTYLBENZENE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005			0.26			
TERBACIL	EPA 525.2	12	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005						
TERT-BUTYLBENZENE	EPA 524.2	188	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005			0.26			
NITROBENZENE	EPA 8260B	2	<DLR	<DLR	<DLR	<DLR	mg/L			0.005						
N-NITROSODIMETHYLAMINE (NDMA)	EPA 521	12	<DLR	<DLR	<DLR	<DLR	mg/L			0.002	0.003	2006				
2,4-DINITROTOLUENE	EPA 524.2	12	<DLR	<DLR	<DLR	<DLR	mg/L			0.005						
2,6-DINITROTOLUENE	EPA 524.2	12	<DLR	<DLR	<DLR	<DLR	mg/L			0.005						
PERFLUOROOCCTANE SULFONIC ACID (PFOS)	EPA 537.1	3	<MRL	<MRL	<MRL	<MRL	ng/L			2.00			6.5			
PERFLUOROOCCTANOIC ACID (PFOA)	EPA 537.1	3	<MRL	<MRL	<MRL	<MRL	ng/L			2.00			5.1			
PERFLUOROBUTANESULFONIC ACID (PFBS)	EPA 537.1	3	<MRL	<MRL	<MRL	<MRL	ng/L			2.00			500			
PERFLUOROHEXANE SULFONIC ACID (PFHxS)	EPA 537.1	3	3.77	3.80	3.90	3.60	ng/L			2.00			3			
BENZO (A) PYRENE	EPA 525.2	13	<DLR	<DLR	<DLR	<DLR	mg/L	0.0002		0.0001	0.000007	2010		Yes	Yes	
PESTICIDES																

Table 4-1: Summary of Water Quality for Valencia Water Division Well V201 (1989- April 2021)

	Method	Well V201 ¹						Maximum Contaminant Level (MCL), Secondary MCL, Detection limits for reporting (DLR), Public Health Goal (PHG), Notification Level (NL)					US EPA Priority Pollutants ⁴	Prop 65 ⁵	
		Samples	Average	Median	Max	Min	Units	MCL/ RL	SMCL	DLR	PHG (as of Aug. 2023) ^{2,3}	Date of PHG			NL mg/L
4,4-DDE	EPA 508	3	<DLR	<DLR	<DLR	<DLR	mg/L			0.005					
ACETOCHLOR	EPA 525.2	12	<DLR	<DLR	<DLR	<DLR	mg/L			0.005					
ALACHLOR	EPA 525.2	18	<DLR	<DLR	<DLR	<DLR	mg/L	0.002		0.001	0.004	1997			Yes
ALDRIN	EPA 508	14	<DLR	<DLR	<DLR	<DLR	mg/L			0.000075				Yes	Yes
BROMACIL	EPA 525.2	18	<DLR	<DLR	<DLR	<DLR	mg/L			0.01					Yes
CARBARYL	EPA 531.1	6	<DLR	<DLR	<DLR	<DLR	mg/L			0.005					
CARBOFURAN	EPA 531.1	6	<DLR	<DLR	<DLR	<DLR	mg/L	0.018		0.005	0.0007	2016			
CHLORDANE	EPA 508	6	<DLR	<DLR	<DLR	<DLR	mg/L	0.0001		0.0001	0.00003	2006	Yes	Yes	
CHLOROTHALONIL	EPA 508	1	<DLR	<DLR	<DLR	<DLR	mg/L			0.005					Yes
DALAPON	EPA 515.3	5	<DLR	<DLR	<DLR	<DLR	mg/L	0.2		0.01	0.79	2009			
DIAZINON	EPA 525.2	17	<DLR	<DLR	<DLR	<DLR	mg/L			0.00025					
1,2-DIBROMO-3-CHLOROPROPANE (DBCP)	EPA 504.1	5	<DLR	<DLR	<DLR	<DLR	mg/L	0.0002		0.00001	0.000003	2020			Yes
DIELDRIN	EPA 508	5	<DLR	<DLR	<DLR	<DLR	mg/L			0.00002				Yes	Yes
DIMETHOATE	EPA 525.2	14	<DLR	<DLR	<DLR	<DLR	mg/L			0.01					
DINOSEB	EPA 515.3	5	<DLR	<DLR	<DLR	<DLR	mg/L	0.007		0.002	0.014	2010			Yes
DIQUAT	EPA 549.2	7	<DLR	<DLR	<DLR	<DLR	mg/L	0.02		0.004	0.006	2016			
DIURON	EPA 632	4	<DLR	<DLR	<DLR	<DLR	mg/L			0.001					Yes
ENDRIN	EPA 508	10	<DLR	<DLR	<DLR	<DLR	mg/L	0.002		0.0001	0.0018	2016	Yes	Yes	
HEPTACHLOR	EPA 508	8	<DLR	<DLR	<DLR	<DLR	mg/L	0.00001		0.00001	0.000008	1999	Yes	Yes	
HEPTACHLOR EPOXIDE	EPA 508	8	<DLR	<DLR	<DLR	<DLR	mg/L	0.00001		0.00001	0.000006	1999	Yes	Yes	
LINDANE	EPA 508	19	<DLR	<DLR	<DLR	<DLR	mg/L	0.0002		0.0002	0.000032	2005	Yes	Yes	
METHOXYCHLOR	EPA 508	19	<DLR	<DLR	<DLR	<DLR	mg/L	0.03		0.0002	0.00009	2010			
METRIBUZIN	EPA 525.2	12	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005					
MOLINATE	EPA 525.2	21	<DLR	<DLR	<DLR	<DLR	mg/L	0.02		0.002	0.001	2008			
OXAMYL	EPA 531.1	6	<DLR	<DLR	<DLR	<DLR	mg/L	0.05		0.02	0.026	2009			
PROMETRYN	EPA 525.2	5	<DLR	<DLR	<DLR	<DLR	mg/L			0.002					
PROPACHLOR	EPA 508	12	<DLR	<DLR	<DLR	<DLR	mg/L			0.0005			0.09		Yes
THIOBENCARB	EPA 525.2	20	<DLR	<DLR	<DLR	<DLR	mg/L	0.07		0.001	0.042	2016			
HERBICIDES															
2,4,5-TP (SILVEX)	EPA 515.3	6	<DLR	<DLR	<DLR	<DLR	mg/L	0.05		0.001	0.025	2003			
2,4-DICHLOROPHOXYACETIC ACID (2,4-D)	EPA 515.3	6	<DLR	<DLR	<DLR	<DLR	mg/L	0.07		0.01	0.02	2009			Yes
ATRAZINE	EPA 525.2	21	<DLR	<DLR	<DLR	<DLR	mg/L	0.001		0.0005	0.00015	1999			
BENTAZON	EPA 515.3	6	<DLR	<DLR	<DLR	<DLR	mg/L	0.018		0.002	0.2	2009			
BUTACHLOR	EPA 525.2	12	<DLR	<DLR	<DLR	<DLR	mg/L			0.00038					
DCPA (TOTAL DI & MONO ACID DEGRADATES)	EPA 515.3	3	<DLR	<DLR	<DLR	<DLR	mg/L			0.0001					
DICAMBA	EPA 515.3	2	<DLR	<DLR	<DLR	<DLR	mg/L			0.0015					
2,3,7,8-TCDD (DIOXIN)	EPA 1613B	1	<DLR	<DLR	<DLR	<DLR	mg/L	0.00003		0.000005	5x10-11	2010			
ENDOTHAL	EPA 548	1	<DLR	<DLR	<DLR	<DLR	mg/L	100		45	94	2014			
GLYPHOSATE	EPA 547	7	<DLR	<DLR	<DLR	<DLR	mg/L	0.7		0.025	0.9	2007			
METOLACHLOR	EPA 525.2	12	<DLR	<DLR	<DLR	<DLR	mg/L			0.001					

Table 4-1: Summary of Water Quality for Valencia Water Division Well V201 (1989- April 2021)

	Method	Well V201 ¹						Maximum Contaminant Level (MCL), Secondary MCL, Detection limits for reporting (DLR), Public Health Goal (PHG), Notification Level (NL)						US EPA Priority Pollutants ⁴	Prop 65 ⁵
		Samples	Average	Median	Max	Min	Units	MCL/ RL	SMCL	DLR	PHG (as of Aug. 2023) ^{2,3}	Date of PHG	NL mg/L		
PICLORAM	EPA 515.4	5	<DLR	<DLR	<DLR	<DLR	mg/L	0.5	0.001	0.166	0.166	2016			
SIMAZINE	EPA 525.2	21	<DLR	<DLR	<DLR	<DLR	mg/L	0.004		0.004	0.004	2001			
TOXAPHENE	EPA 505	7	<DLR	<DLR	<DLR	<DLR	mg/L	70		1	0.03	2003			
POLYCHLORINATED BIPHENYLS															
POLYCHLORINATED BIPHENYLS, TOTAL, AS DCB	EPA 508	6	<DLR	<DLR	<DLR	<DLR	mg/L	0.0005		0.0005	0.00009	2007		Yes	

Notes:

1 = Data downloaded from DDW WQM database in April 2021.

2 = PHG units as indicated for each analyte.

3 = PHG data accessed at: <http://oehha.ca.gov/water/public-health-goals-phgs>.

4 = Priority pollutant list accessed at: <https://www.epa.gov/eg/toxic-and-priority-pollutants-under-clean-water-act#priority>

5 = Prop 65 data accessed at: <https://oehha.ca.gov/proposition-65/proposition-65-list>

TT = Treatment Technology

Comment #22

Table 4-2: Summary of Water Quality for Valencia Water Division Well V201 (Aug-Nov 2017)

PARAMETER	Analytical Method	Well V201 ¹ (Refer to Notes Below the Table)						Maximum Contaminant Level (MCL), Secondary MCL, Detection Limits for Reporting (DLR), Public Health Goal (PHG), Notification Level (NL)					US EPA Priority Pollutants ⁵	Prop 65 ⁶	US EPA's List 2 UCMR ⁷	Notes
		Samples	Average	Median	Max	Min	Units	MCL	SMCL	DLR ²	PHG (as of Aug 2023) ^{3,4}	Date of PHG or Revision				
GENERAL PHYSICAL																
COLOR, APPARENT	SM 2120B	2	<3	<3	<3	<3	Units		15							
ODOR THRESHOLD @ 60 C	EPA 140.1	2	<1	<1	<1	<1	TON		3	1						
pH, LABORATORY	SM 4500H+-B	2	7.65	7.65	7.7	7.6	Units									
SPECIFIC CONDUCTANCE	SM 2510B	2	1500	1500	1500	1500	umho/cm		900							Upper Secondary MCL
TOTAL DISSOLVED SOLIDS	SM 2540C	2	1150	1150	1200	1100	mg/L		500							Upper Secondary MCL
TURBIDITY, LABORATORY	EPA 180.1	2			0.52	ND	NTU		5							
MAJOR CATIONS																
HARDNESS (TOTAL) as CaCO ₃	EPA 200.7	2	670	670	670	670	mg/L									
CALCIUM	EPA 200.7	2	180	180	180	180	mg/L									
MAGNESIUM	EPA 200.7	2	53.5	53.5	54	53	mg/L									
SODIUM	EPA 200.7	2	73	73	74	72	mg/L									
POTASSIUM	EPA 200.7	2	3.05	3.05	3.1	3	mg/L									
TOTAL CATIONS		2	17	17	17	17	meq/L									
MAJOR ANIONS																
ALKALINITY (TOTAL) as CaCO ₃	SM 2320B	2	215	215	220	210	mg/L			5						
HYDROXIDE ALKALINITY		2	<2	<2	0	0										
CARBONATE ALKALINITY		2	<2	<2	0	0										
BICARBONATE ALKALINITY	SM 2320B	2	265	265	270	260	mg/L			5						
SULFATE	EPA 300.0	3	523	520	530	520	mg/L		250	0.5						Upper Secondary MCL
CHLORIDE	EPA 300.0	2	36	35.5	36	35	mg/L		250							Upper Secondary MCL
FLUORIDE (F) (NATURAL-SOURCE)		2	0.23	0.23	0.41	<0.05	mg/L	2	2	0.1	1	1997				
TOTAL ANIONS		2	16.5	16.5	17	16	meq/L									
INORGANICS																
LANGELIER INDEX @ 25 °C	SM 2330B	2			0.96	ND	N/A									
LANGELIER INDEX @ 60 °C	SM 2330B	2	1.35	1.35	1.4	1.3	N/A									
PHOSPHATE, ORTHO (as PO ₄)	EPA 365.3	2	0.092	0.092	0.095	0.089	mg/L	45		0.031						
ASBESTOS	EPA 100.2	2	<0.2	<0.2	<0.2	<0.2	MFL	7		0.2	7	2003	Yes	Yes		
NITRATE + NITRITE (as N)	EPA 353.2	2	3.8	3.8	3.8	3.8	mg/L	10			10	2018				
NITRITE (as N)	EPA 353.2	2	<0.4	<0.4	<0.4	<0.4	mg/L	1		0.4	1	2018				
AGGRESSIVENESS INDEX (CORROSIVITY)	AWWA	2	13	13	13	13	N/A									
PERCHLORATE	EPA 314.0	38	8.7	8.1	16	6.7	µg/L	6		2	1	2015				
INORGANICS (METALS)																
ALUMINUM	EPA 200.8	2	<50	<50	4800	<50	µg/L	1000	200	50	0.6	2001				
ANTIMONY	EPA 200.8	2	<6	<6	<6	<6	µg/L	6		6	0.001 (1 ppb)	2016	Yes			
ARSENIC	EPA 200.8	2	<2	<2	6	<2	µg/L	10		2	0.004	2004	Yes	Yes		
BARIUM	EPA 200.8	2	<100	<100	<100	<100	µg/L	1000		100	2000	2003				
BERYLLIUM	EPA 200.8	2	<1	<1	<1	<1	µg/L	4		1	1	2003	Yes			
BORON	EPA 200.8	2	345	345	350	340	µg/L			100						
CADMIUM	EPA 200.8	2	<1	<1	<1	<1	µg/L	5		1	0.04	2006	Yes	Yes		
CHROMIUM (HEXAVALENT) (Cr(VI))			0.98	0.98	1	0.96	µg/L	10		1	0.02	2011	Yes	Yes		
CHROMIUM (TOTAL)	EPA 200.8	2	<10	<10	<10	<10	µg/L	50		10			Yes	Yes		
COPPER	EPA 200.8	2	<50	<50	<50	<50	µg/L		1000	50	300	2008				
IRON	EPA 200.7	2	<100	<100	<100	<100	µg/L		300	100						
LEAD	EPA 200.8	2	<5	<5	<5	<5	µg/L				0.2	2009	Yes	Yes		
MANGANESE	EPA 200.8	2	<20	<20	<20	<20	µg/L		50	20						
MERCURY	EPA 245.1	2	<1	<1	<1	<1	µg/L	2		1	1.2	2005	Yes	Yes		
NICKEL	EPA 200.8	2	<10	<10	12	<10	µg/L	100		10	12	2001				
SELENIUM	EPA 200.8	2	6.6	6.6	7.1	6.1	µg/L	50		5	30	2010	Yes	Yes		
SILVER	EPA 200.8	3	<6.8	<10	<10	<0.5	µg/L		100	10						
THALLIUM	EPA 200.8	2	<1	<1	<1	<1	µg/L				0.1	2004				
ZINC	EPA 200.8	2	<50	<50	<50	<50	µg/L		5000	50						

Table 4-2: Summary of Water Quality for Valencia Water Division Well V201 (Aug-Nov 2017)

PARAMETER	Analytical Method	Well V201 ¹ (Refer to Notes Below the Table)						Maximum Contaminant Level (MCL), Secondary MCL, Detection Limits for Reporting (DLR), Public Health Goal (PHG), Notification Level (NL)					US EPA Priority Pollutants ⁵	Prop 65 ⁶	US EPA's List 2 UCMR ⁷	Notes	
		Samples	Average	Median	Max	Min	Units	MCL	SMCL	DLR ²	PHG (as of Aug 2023) ^{3,4}	Date of PHG or Revision					NL (µg/L)
BTEX, OTHER BENZENE DERIVATIVES AND FUEL OXYGENATES																	
BENZENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	1		0.5	0.15	2001		Yes	Yes		
TOLUENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	150		0.5	150	1999		Yes	Yes		
M,P-XYLENES	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
O-XYLENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
XYLENES (TOTAL)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	1750			1800	1997					
ETHYLBENZENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	300		0.5	300	1997		Yes	Yes		
METHYL TERT-BUTYL ETHER (MTBE)	EPA 524.2	7	<3.0	<3.0	<3.0	<3.0	µg/L	13	5	3	13	1999					
TERT-AMYL-METHYL ETHER (TAME)	EPA 524.2	7	<3.0	<3.0	<3.0	<3.0	µg/L			3							
DI-ISOPROPYL ETHER (DIPE)	EPA 524.2	7	<3.0	<3.0	<3.0	<3.0	µg/L			3							
ISOPROPYLBENZENE (CUMENE)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							0.77
ETHYL TERT-BUTYL ETHER	EPA 524.2	7	<3.0	<3.0	<3.0	<3.0	µg/L			3							
TRIALOMETHANES																	
BROMODICHLOROMETHANE (THM)	EPA 524.2	7	<1.0	<1.0	<1.0	<1.0	µg/L			1					Yes		
BROMOFORM (THM)	EPA 524.2	7	<1.0	<1.0	<1.0	<1.0	µg/L			1				Yes	Yes		
CHLOROFORM (THM)	EPA 524.2	7	<1.0	<1.0	<1.0	<1.0	µg/L			1				Yes	Yes		
DIBROMOCHLOROMETHANE (THM)	EPA 524.2	7	<1.0	<1.0	<1.0	<1.0	µg/L			1							
TOTAL TRIHALOMETHANES	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	80									
VOLATILE ORGANICS																	
1,1,1,2-TETRACHLOROETHANE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
1,1,1-TRICHLOROETHANE (1,1,1-TCA)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	200		0.5	100	2006		Yes			
1,1,2,2-TETRACHLOROETHANE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	1		0.5	0.1	2003		Yes	Yes		
1,1,2-TRICHLOROETHANE (1,1,2-TCA)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	5		0.5	0.3	2006		Yes			
1,1-DICHLOROETHANE (1,1-DCA)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	5		0.5	3	2003		Yes	Yes		
1,1-DICHLOROETHYLENE (1,1-DCE)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	6		0.5	10	1999		Yes			
1,1-DICHLOROPROPENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
1,2,3-TRICHLOROBENZENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
1,2,4-TRICHLOROBENZENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	5		0.5	5	1999		Yes			
1,2,4-TRIMETHYLBENZENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5			330				
1,2-DICHLOROBENZENE (O-DCB)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	600		0.5				Yes			
1,2-DICHLOROETHANE (1,2-DCA)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	0.5		0.5	0.4	2005		Yes			
1,2-DICHLOROPROPANE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	0.5		0.5	0.5	1999		Yes	Yes		
1,3,5-TRIMETHYLBENZENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5			330				
1,3-DICHLOROBENZENE (m-DCB)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5				Yes			
1,3-DICHLOROPROPANE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
TRANS-1,3-DICHLOROPROPENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	0.5		0.5							
CIS-1,3-DICHLOROPROPENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	0.5		0.5							
1,3-DICHLOROPROPENE (TOTAL)	EPA 524.2	9	<0.5	<0.5	<0.5	<0.5	µg/L	0.5		0.5				Yes			
1-PHENYLPROPANE (N-PROPYLBENZENE)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
2,2-DICHLOROPROPANE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
2-CHLOROTOLUENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5			140				
4-CHLOROTOLUENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
BROMOBENZENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
BROMOCHLOROMETHANE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
BROMOMETHANE (METHYL BROMIDE)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
CARBON TETRACHLORIDE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	0.5		0.5	0.1	2000					
CARBON DISULFIDE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5			160		Yes		
CHLOROETHANE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5				Yes	Yes		
CHLOROMETHANE (METHYL CHLORIDE)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5				Yes			
CIS-1,2-DICHLOROETHYLENE (c-1,2-DCE)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	6		0.5	0.1	2006					
DIBROMOMETHANE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	5		0.5	0.004	2000					
DICHLORODIFLUOROMETHANE (FREON 12)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5			1				
DICHLOROMETHANE (METHYLENE CHLORIDE)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	5		0.5				Yes	Yes		
METHYL ETHYL KETONE (2-BUTANONE)	EPA 524.2	7	<5.0	<5.0	<5.0	<0.5	µg/L			5			0.12				
METHYL ISOBUTYL KETONE (4-METHYL-2-PENTANONE Or MIBK)	EPA 524.2	7	<5.0	<5.0	<5.0	<0.5	µg/L			5			120		Yes		
MONOCHLOROBENZENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	70		0.5	70	2014		Yes			
N-BUTYLBENZENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
STYRENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	100		0.5	0.5	2010			Yes		

Table 4-2: Summary of Water Quality for Valencia Water Division Well V201 (Aug-Nov 2017)

PARAMETER	Analytical Method	Well V201 ¹ (Refer to Notes Below the Table)						Maximum Contaminant Level (MCL), Secondary MCL, Detection Limits for Reporting (DLR), Public Health Goal (PHG), Notification Level (NL)					US EPA Priority Pollutants ⁵	Prop 65 ⁶	US EPA's List 2 UCMR ⁷	Notes	
		Samples	Average	Median	Max	Min	Units	MCL	SMCL	DLR ²	PHG (as of Aug 2023) ^{3,4}	Date of PHG or Revision					NL (µg/L)
TETRACHLOROETHYLENE (PCE)	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	5		0.5	0.06	2001		Yes	Yes		
TRANS-1,2-DICHLOROETHYLENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	10		0.5	60	2006		Yes			
TRICHLOROETHYLENE (TCE)	EPA 524.2	40	0.72	0.7	1	<0.5	µg/L	5		0.5	1.7	2009		Yes	Yes		
TRICHLOROFLUOROMETHANE (FREON 11)	EPA 524.2	7	<5	<5	<5	<5	µg/L	150		5	1300	2014					
TRICHLOROTRIFLUOROETHANE (FREON 113)	EPA 524.2	7	<10	<10	<10	<5	µg/L	150		10	4000	2011					
VINYL CHLORIDE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L	0.5		0.5	0.05	2000		Yes	Yes		
SEMI-VOLATILE ORGANICS																	
DI(2-ETHYLHEXYL)ADIPATE	EPA 525.2	2	<5	<5	<5	<5	µg/L	400		5	200	2003					
DI(2-ETHYLHEXYL)PHTHALATE	EPA 525.2	2	<3	<3	<3	<3	µg/L	4		3	12	1997		Yes	Yes		
EPTC	EPA 525.2	2	<0.1	<0.1	<0.1	<0.1	µg/L	0.2		0.1					Yes		
HEXACHLOROENZENE	EPA 508	2	<0.5	<0.5	<0.5	<0.5	µg/L	1		0.5	0.03	2003		Yes	Yes		
HEXACHLOROBUTADIENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5				Yes	Yes		
HEXACHLOROCYCLOPENTADIENE	EPA 508	2	<1.0	<1.0	<1.0	<1.0	µg/L	50		1	2	2014		Yes			
NAPHTHALENE	EPA 525.2	8	<0.5	<0.5	<0.5	<0.5	µg/L			0.5			17	Yes	Yes		
PENTACHLOROPHENOL	EPA 515.3	2	<0.2	<0.2	<0.2	<0.2	µg/L	1		0.2	0.3	2009		Yes	Yes		
P-ISOPROPYLTOLUENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5							
SEC-BUTYLBENZENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5			260				
TERT-BUTYLBENZENE	EPA 524.2	7	<0.5	<0.5	<0.5	<0.5	µg/L			0.5			260				
ACETOCHLOR	EPA 525.2	2	<0.1	<0.1	<0.1	<0.1	µg/L			0.1						Yes	
ALACHLOR (ALANEX)	EPA 525.2	2	<0.1	<0.1	<0.1	<0.1	µg/L	2		1	4	1997			Yes		
ALDRIN	EPA 508	2	<0.075	<0.075	<0.075	<0.075	µg/L			0.075				Yes	Yes		
BROMACIL (HYVAR)	EPA 525.2	2	<10	<10	<10	<10	µg/L			10							
CHLOROTHALONIL	EPA 508	2	<0.1	<0.1	<0.1	<0.1	µg/L			0.1						Yes	
DIAZINON	EPA 525.2	2	<0.1	<0.1	<0.1	<0.1	µg/L			0.1							
DIMETHOATE (CYGON)	EPA 525.2	2	<0.1	<0.1	<0.1	<0.1	µg/L			10						Considered, but not listed	
HEPTACHLOR	EPA 508	2	<0.04	<0.04	<0.04	<0.04	µg/L	0.01		0.04	0.008	1999		Yes	Yes		
HEPTACHLOR EPOXIDE	EPA 508	2	<0.05	<0.05	<0.05	<0.05	µg/L	0.01		0.05	0.006	1999		Yes	Yes		
LINDANE (gamma-BHC)	EPA 508	2	<0.2	<0.2	<0.2	<0.2	µg/L	0.2		0.04	0.032	2005		Yes	Yes		
METHOXYCHLOR	EPA 508	2	<10	<10	<10	<10	µg/L	30		10	0.09	2010					
METRIBUZIN	EPA 525.2	2	<0.1	<0.1	<0.1	<0.1	µg/L			0.05						Considered, but not listed	
MOLINATE (ORDRAM)	EPA 525.2	2	<2	<2	<2	<2	µg/L	20		2	1	2008			Yes		
PROPACHLOR	EPA 508	2	<0.5	<0.5	<0.5	<0.5	µg/L			0.5			90		Yes		
TERBACIL	EPA 525.2	2	<0.1	<0.1	<0.1	<0.1	µg/L			0.5					Yes		
THIOBENCARB (BOLERO)	EPA 525.2	2	<1.0	<1.0	<1.0	<1.0	µg/L	70		1	42	2016					Also has a secondary MCL of 1 µg/L
HERBICIDES																	
ATRAZINE (AATREX)	EPA 525.2	2	<0.5	<0.5	<0.5	<0.5	µg/L	1		0.5	0.15	1999			Yes		
BUTACHLOR	EPA 525.2	2	<0.38	<0.38	<0.38	<0.38	µg/L			0.38							
METOLACHLOR	EPA 525.2	2	<0.1	<0.1	<0.1	<0.1	µg/L			0.05							
SIMAZINE (PRINCEP)	EPA 525.2	2	<1	<1	<1	<1	µg/L	4		1	4	2001			Yes		
PHARMACEUTICALS AND SURROGATES																	
CAFFEINE	EPA 525.2	2	<0.1	<0.1	<0.1	<0.1	µg/L										
RADIONUCLIDES																	
GROSS ALPHA	EPA 900.0	2	3.45	3.45	3.9	3	pCi/L	15		3	N/A						
GROSS ALPHA MDA95 ⁸	EPA 900.0	2	0.14	0.14	0.15	0.13		50		4	N/A						
GROSS BETA	EPA 900.0	2	4.25	4.25	4.5	<4	pCi/L	50		4							
GROSS BETA MDA95 ⁸	EPA 900.0	2	2.25	2.25	2.7	1.8											
URANIUM (PCI/L)	EPA 200.8	2	5.5	5.5	5.7	5.3	pCi/L	20		1	0.43	2001					

ND value indicates that parameter not detected at the indicated reporting limit.

Notes:

1 = Data obtained from Valencia Water Company for samples collected during limited pumping of Well V201 in August through November 2017. Complete analytical data reports are included in Appendix E.

2 = MRLs where DLR is not available

3 = PHG units as indicated for each analyte

4 = PHG data accessed at: <https://oehha.ca.gov/water/public-health-goals-phgs>

5 = Priority pollutant list accessed at: <https://www.epa.gov/sites/production/files/2015-09/documents/priority-pollutant-list-epa.pdf>

6 = Prop 65 data accessed at: <https://oehha.ca.gov/proposition-65/proposition-65-list>

7 = EPA List 2 UCMR accessed at: <https://www.epa.gov/dwucmr/second-unregulated-contaminant-monitoring-rule>

8 = Minimum Detectable Activity at the 95% confidence level, per 22 CCR 64442 and 64443.

Comment #25

Table 6-2: Parameters and Sample Locations for Compliance Monitoring at V201 Wellhead Treatment Facility

Parameter ^(a)	Untreated V201	GAC Vessels ^(b)	Lead IX Vessel Effluent	Lag IX Vessel Effluent	Finished (chloraminated) Water
Perchlorate	Weekly	--	Weekly	Weekly	--
VOCs ^(c)	Weekly	Monthly ^(d)	--	Monthly	--
Total Coliform	Monthly	Monthly ^(e)	--	Monthly	Monthly
Heterotrophic Plate Count	Monthly	Monthly ^(e)	--	Monthly	Monthly
Total Dissolved Solids	Monthly	--	--	--	--
Specific Conductance	Monthly	--	--	--	--
Title 22 and Other Constituents, Non-Toxic VOCs ^(a, b)	Annual	--	--	--	--

Abbreviations:

DLR = detection limit for reporting
GAC = granular activated carbon
IX = ion exchange
VOCs = volatile organic compounds
TCE = Trichloroethylene
PCE = Tetrachloroethylene

Notes:

- (a) Water quality parameters are defined as per DDW Metropolitan District letter dated 31 December 2013 to Valencia Water Company regarding “System No 1919240: Second Period Vulnerability Assessments January 1, 2014, through December 31, 2016” (Appendix E).
- (b) GAC vessels equipped with sampling ports at 25%, 50% and 75% of volume. Replacement of GAC will be scheduled when TCE or PCE concentrations in sample collected at 50% sampling port exceeds the DLR.
- (c) VOCs analyzed using USEPA Method 524.2.
- (d) SCVWA will collect monthly samples at the 50% sample port and at the lag ion exchange vessel. Once the 50% sample port has a VOC detection above the DLR, SCVWA will increase the monitoring frequency from monthly to weekly. Once a second positive detection is confirmed at the 50% port, a GAC change out will be scheduled.

Comment #26

Well 201 Tentatively Identified Compounds (TICs)								
	Location	Report #	Date	524.2 TICs Analyte	524.2 result (Est. Conc.)	525.2 TICs Analyte	525.2 Result (Est. Conc.)	Units
1	raw 201	648806	4/3/2017	ND		Nonanal	0.6	ug/L
						n-Hexadecanoic acid	1	ug/L
						unknown amide	0.7	ug/L
2	raw 201	660519	5/16/2017	1-Butene	0.5	n-Hexadecanoic acid	2.1	ug/L
						n-octadecanoic acid	1.3	ug/L
						unknown amide	1.8, 2.8	ug/L
3	raw 201	680464	8/17/2017	ND		n-octadecanoic acid	0.7	ug/L
4	raw 201	683341	8/31/2017	ND		Unknown acid	1.0, 0.8, 2.5, 1.2, 0.6, 1.8	ug/L
5	raw 201	720050	2/22/2018	ND		ND		ug/L
6	raw 201	736251	5/7/2018	Unknown compound	0.9	ND		ug/L
7	raw 201	752905	9/24/2018	ND		ND		ug/L
8	NPDES 201	665312	6/8/2017	acetaldehyde	4			ug/L
				furfural	5			ug/L
				acetone	64			ug/L

Surveillance Well Monitoring EPA Methods and Analyte Description

Method Description	Method Code	Analyte Description	RL	Units
Gross Alpha and Gross Beta Radioactivity	900.0	Gross Beta	4.00	pCi/L
Gross Alpha by Co-Precipitation	SM7110C	Gross Alpha	3.00	pCi/L
Radium-226 (GFPC)	903.0	Radium-226	1.00	pCi/L
		Ba Carrier		g
Radium-228 (GFPC)	904.0	Radium-228	1.00	pCi/L
		Ba Carrier		g
		Y Carrier		g
Strontium-90 (GFPC)	905_Sr90	Strontium-90	3.00	pCi/L
		Sr Carrier		g
		Y Carrier		g
Tritium, Total (LSC)	906.0	Tritium	500	pCi/L
Nitroaromatics and Nitramines (LC/MS)	8321B_Exp	2,4,6-Trinitrotoluene	0.100	ug/L
		HMX	0.100	ug/L
		RDX	0.100	ug/L
		1,3-Dinitrobenzene-d4		ug/L
		2,4-dinitrotoluene-d3		ug/L
		Nitrobenzene-d5 (Surr)	0.100	ug/L
Mercury (ICP/MS)	200.8_Hg	Hg	0.200	ug/L
Chromium, Hexavalent (Ion Chromatography)	218.6_Pres_ORGF	Hexavalent Chromium (CrVI)	0.0200	ug/L
Perchlorate (IC)	314_PREC	Perchlorate	2.00	ug/L
Organochlorine Pesticides/PCBs (GC)	505_PREC	Chlordane	0.100	ug/L
		Endrin	0.0100	ug/L
		Heptachlor epoxide (isomer B)	0.0100	ug/L
		Methoxychlor	0.0500	ug/L
		Lindane	0.0100	ug/L
		Alachlor (Alanex)	0.100	ug/L
		Toxaphene	0.500	ug/L
		PCB-1016	0.0700	ug/L
		PCB-1221	0.100	ug/L
		PCB-1232	0.100	ug/L
		PCB-1242	0.100	ug/L
		PCB-1248	0.100	ug/L
		PCB-1254	0.100	ug/L
		PCB-1260	0.0700	ug/L
		Polychlorinated biphenyls, Total	0.100	ug/L
		Aldrin	0.0100	ug/L
Dieldrin	0.0100	ug/L		
Tetrachloro-m-xylene		ug/L		
Herbicides (GC)	515.4_PREC	2,4,5-TP (Silvex)	0.200	ug/L
		2,4,5-T	0.200	ug/L
		Dinoseb	0.200	ug/L
		2,4-D	0.100	ug/L
		2,4-DB	2.00	ug/L
		Bentazon	0.500	ug/L
		Pentachlorophenol	0.0400	ug/L
		Dalapon	1.00	ug/L
		3,5-Dichlorobenzoic acid	0.500	ug/L
		Picloram	0.100	ug/L
		Acifluorfen	0.200	ug/L
		Dicamba	0.100	ug/L
Dichlorprop	0.500	ug/L		
2,4-Dichlorophenylacetic acid (Surr)		ug/L		
Nitrosoamines (GC/MS/MS)	521.1	N-Nitrosodimethylamine (NDMA)	2.00	ng/L
		N-Nitrosodi-n-butylamine (NDBA)	2.00	ng/L
		N-Nitrosodiethylamine (NDEA)	2.00	ng/L
		N-Nitrosodi-n-propylamine (NDPA)	2.00	ng/L
		N-Nitrosomethylethylamine (NMEA)	2.00	ng/L
		N-Nitrosomorpholine (NMOR)	2.00	ng/L
		N-Nitrosopiperidine (NPIP)	2.00	ng/L
		N-Nitrosopyrrolidine (NPYR)	2.00	ng/L
		N-Nitrosodimethylamine-d6 (Surr)		ng/L

Volatile Organic Compounds (GC/MS)	524.2_Pres_PREC	Dichlorodifluoromethane	0.500	ug/L
		Chloromethane (methyl chloride)	0.500	ug/L
		Vinyl Chloride (VC)	0.300	ug/L
		Bromomethane (Methyl Bromide)	0.500	ug/L
		Chloroethane	0.500	ug/L
		Trichlorofluoromethane (Freon 11)	0.500	ug/L
		1,1-Dichloroethylene	0.500	ug/L
		Bromoethane	0.500	ug/L
		Trichlorotrifluoroethane	0.500	ug/L
		Carbon disulfide	0.500	ug/L
		Dichloromethane	0.500	ug/L
		trans-1,2-Dichloroethylene	0.500	ug/L
		Methyl-tert-butyl Ether (MTBE)	0.500	ug/L
		1,1-Dichloroethane	0.500	ug/L
		2-Butanone (MEK)	5.00	ug/L
		Diisopropyl ether	3.00	ug/L
		cis-1,2-Dichloroethylene	0.500	ug/L
		2,2-Dichloropropane	0.500	ug/L
		Bromochloromethane	0.500	ug/L
		Chloroform (Trichloromethane)	0.500	ug/L
		Tert-butyl ethyl ether	3.00	ug/L
		1,1,1-Trichloroethane	0.500	ug/L
		1,2-Dichloroethane	0.500	ug/L
		1,1-Dichloropropene	0.500	ug/L
		Benzene	0.500	ug/L
		Carbon tetrachloride	0.500	ug/L
		Tert-amyl methyl ether	3.00	ug/L
		Trichloroethylene (TCE)	0.500	ug/L
		1,2-Dichloropropane	0.500	ug/L
		Dibromomethane	0.500	ug/L
		Bromodichloromethane	0.500	ug/L
		cis-1,3-Dichloropropene	0.500	ug/L
		trans-1,3-Dichloropropene	0.500	ug/L
		Toluene	0.500	ug/L
		1,1,2-Trichloroethane	0.500	ug/L
		2-Hexanone	10.0	ug/L
		1,3-Dichloropropane	0.500	ug/L
		Dibromochloromethane	0.500	ug/L
		Tetrachloroethene (PCE)	0.500	ug/L
		Chlorobenzene	0.500	ug/L
		1,1,1,2-Tetrachloroethane	0.500	ug/L
		Ethylbenzene	0.500	ug/L
		m,p-Xylenes	0.500	ug/L
		Styrene	0.500	ug/L
		o-Xylene	0.500	ug/L
		Bromoform	0.500	ug/L
		1,1,2,2-Tetrachloroethane	0.500	ug/L
		1,2,3-Trichloropropane	0.500	ug/L
		Isopropylbenzene	0.500	ug/L
		Bromobenzene	0.500	ug/L
		N-Propylbenzene	0.500	ug/L
		o-Chlorotoluene	0.500	ug/L
		p-Chlorotoluene	0.500	ug/L
		1,3,5-Trimethylbenzene	0.500	ug/L
		tert-Butylbenzene	0.500	ug/L
		1,2,4-Trimethylbenzene	0.500	ug/L
		sec-Butylbenzene	0.500	ug/L
		m-Dichlorobenzene (1,3-DCB)	0.500	ug/L
		p-Dichlorobenzene (1,4-DCB)	0.500	ug/L
		p-Isopropyltoluene	0.500	ug/L
		o-Dichlorobenzene (1,2-DCB)	0.500	ug/L
		n-Butylbenzene	0.500	ug/L
		1,2,4-Trichlorobenzene	0.500	ug/L
		Naphthalene	0.500	ug/L
		Hexachlorobutadiene	0.500	ug/L
		1,2,3-Trichlorobenzene	0.500	ug/L
		1,2-Dichloroethane-d4 (Surr)		ug/L
		4-Bromofluorobenzene (Surr)		ug/L
		Toluene-d8 (Surr)		ug/L
Semivolatile Organic Compounds (GC/MS)	525.2_PREC	2,4-Dinitrotoluene	0.100	ug/L
		Acenaphthylene	0.100	ug/L
		Alachlor (Alanex)	0.0500	ug/L
		alpha-Chlordane	0.0500	ug/L
		Anthracene	0.0200	ug/L
		Atrazine	0.0500	ug/L

		Benz(a)anthracene	0.0500	ug/L
		Benzo[a]pyrene	0.0200	ug/L
		Benzo[b]fluoranthene	0.0200	ug/L
		Benzo[g,h,i]perylene	0.0500	ug/L
		Benzo[k]fluoranthene	0.0200	ug/L
		Bromacil	0.100	ug/L
		Butachlor	0.0500	ug/L
		Butylbenzylphthalate	0.500	ug/L
		Caffeine	0.0500	ug/L
		Chrysene	0.0200	ug/L
		Di(2-ethylhexyl)adipate	0.600	ug/L
		Bis(2-ethylhexyl) phthalate	0.600	ug/L
		Diazinon (Qualitative)	0.100	ug/L
		Dibenz(a,h)anthracene	0.0500	ug/L
		Dieldrin	0.200	ug/L
		Diethylphthalate	0.500	ug/L
		Dimethoate	0.100	ug/L
		Dimethylphthalate	0.500	ug/L
		Di-n-butyl phthalate	1.00	ug/L
		Endrin	0.100	ug/L
		Fluoranthene	0.100	ug/L
		Fluorene	0.0500	ug/L
		gamma-Chlordane	0.0500	ug/L
		Hexachlorobenzene	0.0500	ug/L
		Hexachlorocyclopentadiene	0.0500	ug/L
		Indeno[1,2,3-cd]pyrene	0.0500	ug/L
		Isophorone	0.500	ug/L
		Lindane	0.0400	ug/L
		Methoxychlor	0.100	ug/L
		Metolachlor	0.0500	ug/L
		Metribuzin	0.0500	ug/L
		Molinate	0.100	ug/L
		Phenanthrene	0.0400	ug/L
		Propachlor	0.0500	ug/L
		Pyrene	0.0500	ug/L
		Simazine	0.0500	ug/L
		Thiobencarb	0.200	ug/L
		trans-Nonachlor	0.0500	ug/L
		Trifluralin	0.100	ug/L
		2-Nitro-m-xylene		ug/L
		Triphenylphosphate		ug/L
		Perylene-d12		ug/L
Carbamate Pesticides (HPLC)	531.2_PREC	3-Hydroxycarbofuran	0.500	ug/L
		Aldicarb	0.500	ug/L
		Aldicarb sulfone	0.500	ug/L
		Aldicarb sulfoxide	0.500	ug/L
		Baygon	0.500	ug/L
		Carbaryl	0.500	ug/L
		Carbofuran	0.500	ug/L
		Methiocarb	0.500	ug/L
		Methomyl	0.500	ug/L
		Oxamyl	0.500	ug/L
		BDMC		ug/L
Glyphosate (DAI HPLC)	547_PREC	Glyphosate	6.00	ug/L
Endothall (GC/MS)	548.1_PREC	Endothall	5.00	ug/L
Diquat and Paraquat (HPLC)	549.2_PREC	Diquat	0.400	ug/L
		Paraquat	2.00	ug/L
Volatile Organic Compounds (GC/MS)	CA_SRL_524M_SIM	1,2,3-Trichloropropane	0.00500	ug/L
		Toluene-d8 (Surr)		ug/L

Comment #29

Table 7-1: Initial MCL-Equivalent Calculation for Well V201

Endpoint	Contaminant, units	Maximum Concentration (a)	CA MCL/NL	Concentration / MCL	Ratio (b)
Acute					
	Perchlorate, µg/L ^(c)	ND	6	0/6	0
	Nitrate as N, mg/L	4.2	10	4.2/10	0.4
Sum: MCL-Equivalents (acute)					0.4
Chronic					
Non-Cancer Health Risk^(d)					
	Boron, µg/L ^(e)	350	1,000	350/1,000	0.4
	Fluoride, mg/L	0.9	2	0.90/2	0.5
	Selenium, µg/L	7.5	50	7.5/50	0.2
	Vanadium, µg/L ^(f)	8.4	50	8.4/50	0.2
Sum: MCL-Equivalents (non-cancer risk)					1.3
Cancer Health Risk					
	Hexavalent chromium, µg/L ^(g)	1.5	10	1.5/10	0.2
	NDMA, ng/L ^(h)	2.4	30	2.4/30	0.1
	Toluene, µg/L	0.51	150	0.51/150	0
	TCE, µg/L ^(a)	ND	5	0/5	0.0
	Uranium, pCi/L	6	20	6/20	0.3
	Gross Alpha, pCi/L ⁽ⁱ⁾	0.1	15	0.1/15	0
Sum: MCL-Equivalents (cancer risk)					0.6

Abbreviations:

MCL = California maximum contaminant level
mg/L = milligrams per liter
NDMA = N-Nitrosodimethylamine
ng/L = nanograms per liter

NL= California notification level
pCi/L= picocuries per liter
TCE= trichloroethane
µg/L= micrograms per liter

Notes:

- (a) Data for chromium and uranium date to early 2000s and include recent samples.
(b) Reported to one significant digit per DDW Process Memo 97-005-R2020.
(c) Perchlorate and TCE concentration measured in effluent from the lag ion exchange vessel.
(d) List of non-cancer health risk constituents per request and guidance from DDW.
(e) Ratio for Boron is calculated using the NL of 1,000 µg/L because there is no MCL.
(f) Ratio for Vanadium is calculated using the NL of 50 µg/L because there is no MCL.
(g) Withdrawn MCL of 10 µg/L for hexavalent chromium is considered conservative and is used for purposes of calculation of ratios and MCL-equivalent.
(h) Surrogate MCL for a constituent with cancer risk is the response level x 0.1. Therefore, the surrogate NDMA MCL is (300 ng/L x 0.1) = 30 ng/L. Note, the notification level is used as the surrogate MCL for the non-cancer risk constituents.
(i) Deduct the gross alpha concentration from the uranium concentration when calculating the MCL equivalent ratio to ensure no double counting. Highest gross alpha by coprecipitation concentration was 6.1 pCi/L on 11/12/2019.