

**RESPONSE TO COMMENTS  
UNIVERSITY OF SOUTHERN CALIFORNIA  
WRIGLEY MARINE SCIENCE CENTER  
TENTATIVE ORDER NO. R4-2024-XXXX  
NPDES NO. CA0056651, CI NO. 6068**

**Comment Letter dated April 22, 2024, from Annelisa Ehret Moe, Heal the Bay**

<b>No.</b>	<b>Comment</b>	<b>Response</b>	<b>Action Taken</b>
1.	<p>Heal the Bay supports the mission of the Wrigley Institute to create a more sustainable and environmentally just future for our planet and all who live on it, as well as the work done at the Wrigley Marine Science Center (WMSC) satellite location for research and education. We also support the WMSC action on climate and carbon management including continued efforts to install a planned solar panel farm that will also provide cover for equipment in the storage area as an additional on-site best management practice (BMP). Considering that the WMSC discharges to the Pacific Ocean within the Southern California Bight, which is highly impacted section of coastline, due at least in part to pollution from human activity, it is critical that discharges to these waters do not contribute to the existing pollution burden.</p>	<p>The Los Angeles Water Board agrees with the efforts to date by the Discharger to address stormwater runoff from the Facility and that impacts from human activity shall not contribute to the existing pollution burden. Staff have been working with the Discharger to address the ongoing exceedances.</p>	None
2.	<p>We are concerned about the long list of effluent violations associated with various pollutants discharged from the WMSC during the previous permit term ... We recognize that the frequency of violations has diminished significantly since 2019, as a result of the BMPs implemented by the discharger including scrap metal removal, erosion control, and the use of nature-based stormwater capture solutions like vegetated swales.</p>	<p>As noted in the response to comment No. 1, staff have been working with the Discharger to understand and address ongoing exceedances. Significant decreases have been observed through the implementation of BMPs. Additional implementation measures are included in the draft tentative for the stormwater pollution prevention program to address exceedances in stormwater runoff. The Discharger</p>	Revision has been made to the Tentative Order.

Response to Comments  
 The University of Southern California  
 Wrigley Marine Science Center

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	<p>However, there have still been recent violations for beryllium, zinc, and bacteria. As currently written in the proposed issuance of waste discharge requirements (WDRs) and National Pollutant Discharge Elimination System (NPDES) Permit for the University of Southern California (USC) WMSC, “the Discharger does not anticipate any significant changes during the permit term of this Order”. <u>We request an explanation of how the remaining water quality exceedances for beryllium, zinc, and bacteria have been, or will be, addressed.”</u></p>	<p>continues to conduct studies from the Facility and surrounding area to identify sources of zinc, beryllium, and bacteria. Continued monitoring and additional investigations are underway in order to provide direction on implementation measures to address the exceedances in stormwater runoff from the Facility.</p> <p>It should be noted that the reference in the Fact Sheet, under Facility Description, section 2.5, for Planned Changes, which stated that “the Discharger does not anticipate any significant changes during the permit term of this Order”, was intended to address any modifications to the operation of the Facility and or the Facility’s treatment of the use of seawater and the discharge of the waste seawater. BMP implementation to address exceedances stormwater runoff is expected to continue on an ongoing basis. This section has been updated to reflect this clarification.</p>	