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Los Angeles Regional Water Quality Control Board

October 22, 2014

Mr. Frank Senteno, City Engineer
City of El Monte
Department of Public Works
11333 Valley Blvd.
El Monte, CA 91731

REVIEW OF THE CITY OF EL MONTE'S DRAFT WATERSHED MANAGEMENT PROGRAM, PURSUANT TO PART VI.C OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Mr. Senteno:

The Regional Water Board has reviewed the draft Watershed Management Program (WMP) submitted on June 26, 2014 by the City of El Monte. This program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop either a Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP) to implement permit requirements on a watershed scale through customized strategies, control measures, and best management practices (BMPs). Development of a WMP or EWMP is voluntary and may be developed individually or collaboratively.

The purpose of a WMP or EWMP is for a Permittee to develop and implement a comprehensive and customized program to control pollutants in MS4 discharges of stormwater and non-stormwater to address the highest water quality priorities. These include complying with the required water quality outcomes of Part V.A (Receiving Water Limitations) and Part VI.E and Attachments L through R (Total Maximum Daily Load (TMDL) Provisions) of the LA County MS4 Permit. If a Permittee opts to develop a WMP or EWMP, the WMP or EWMP must meet the requirements, including conducting a Reasonable Assurance Analysis (RAA), of Part VI.C (Watershed Management Programs) of the LA County Permit and must be approved by the Regional Water Board.

As stated above, on June 26, 2014, the City of El Monte submitted a draft Watershed Management Program (WMP) for their entire jurisdiction to the Regional Water Board pursuant to Part VI.C.4.c of the LA County MS4 Permit.

The Regional Water Board has reviewed the draft WMP and has determined that, for the most part, the draft WMP includes the elements and analysis required in Part VI.C of the LA County

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MS4 Permit. However, some revisions to the City's draft WMP are necessary. The Regional Water Board's comments on the draft WMP, including detailed information concerning necessary revisions to the draft WMP, are found in Enclosure 1 and Enclosure 2, respectively. The specific Permit provisions cited in the enclosures refer to provisions in the LA County MS4 Permit. The LA County MS4 Permit includes a process through which necessary revisions to the draft WMP can be made (Part VI.C.4 in the LA County MS4 Permit). The process requires that a final WMP, revised to address Regional Board comments identified in the enclosures, must be submitted to the Regional Water Board not later than three months after comments are received by the Permittees on the draft program. Please make the necessary revisions to the draft WMP as identified in the enclosures to this letter and submit the revised WMP as soon as possible and no later than **January 22, 2015**.

The revised WMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised Draft El Monte WMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov.

If the necessary revisions are not made, the City of El Monte will be subject to the baseline requirements in Part VI.D of the Order and shall demonstrate compliance with receiving water limitations pursuant to Part V.A and with applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachments O and P pursuant to subparts VI.E.2.d.i.(1)-(3) and VI.E.2.e.i.(1)-(3), respectively.

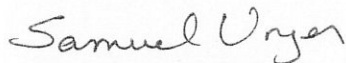
Until the draft WMP is approved, the City of El Monte is required to:

- (a) Continue to implement all watershed control measures in its existing storm water management programs, including actions within each of the six categories of minimum control measures consistent with Title 40, Code of Federal Regulations, section 122.26(d)(2)(iv);
- (b) Continue to implement watershed control measures to eliminate non-storm water discharges through the MS4 that are a source of pollutants to receiving waters consistent with Clean Water Act section 402(p)(3)(B)(ii); and
- (c) Target implementation of watershed control measures in (a) and (b) above to address known contributions of pollutants from MS4 discharges to receiving waters.

In addition on June 26, 2014, the City of El Monte submitted a draft Coordinated Integrated Monitoring Program (CIMP) to the Regional Water Board pursuant to Part IV.C of Attachment E of the LA County MS4 Permit. The Regional Water Board review and comments on the draft CIMP will be provided under separate cover.

If you have any questions, please contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosures:

- Attachment 1 Comments and Necessary Revisions to Draft WMP
- Attachment 2 Comments on Reasonable Assurance Analysis for the City of El Monte

cc: Jesus Gomez, Assistant City Manager
Edmond Suher, Senior Project Engineer, CASC Engineering and Consulting

Los Angeles Regional Water Quality Control Board

Attachment to October 22, 2014 Letter Regarding the City of El Monte's Draft Watershed Management Program (WMP) Submittal Pursuant to Part VI.C of the LA County MS4 Permit (Order No. R4-2012-0175)

Comments and Necessary Revisions to Draft WMP

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment
<p>Part VI.C.5.a.i. Water Quality Characterization (p. 58)</p>	<ul style="list-style-type: none"> • The Regional Board staff acknowledges the City's initiative in conducting outfall monitoring to characterize their storm water and non-storm water discharges at two outfalls, one in the Rio Hondo subwatershed and one in the San Gabriel River watershed. The City states that, "the drainage(s) to the selected outfall(s) are representative of the land uses within the City's jurisdiction. The City's land use is: <ul style="list-style-type: none"> ○ 7% office ○ 10% industrial/commercial ○ 11% retail ○ 58% residential ○ 14% other amenities" Corresponding land use for the drainage areas associated with Outfalls 5 and 7 should be presented for comparison. • At a minimum, the last five years of Mass Emissions data for S10 (LA River) and S14 (SG River) should be considered. Additionally, applicable tributary monitoring data (such as for Rio Hondo @ TS06 conducted from 2002-04) should be considered as well as data collected during TMDL development for Legg Lake (and Peck Road Park Lake, if applicable).
<p>Part VI.C.5.a.ii. Waterbody-Pollutant Classification (page 59)</p>	<p><u>Category 1 Waterbody-Pollutant Combinations:</u></p> <ul style="list-style-type: none"> • The City's draft WMP lists Category 1 pollutants but did not include cadmium, for which there is a WQBEL applicable to storm water per the LA River Metals TMDL. • Cadmium is omitted from the RAA, as are dry weather WQBELs for Cu, Pb, and Zn in the LA River, as well as interim bacteria WQBELs. All WQBELs should be included in the RAA or should be accounted for using a surrogate pollutant. <p><u>Category 2 Waterbody-Pollutant Combinations:</u></p> <ul style="list-style-type: none"> • The draft WMP should be revised to identify the applicable Receiving Water Limitations for Category 2 pollutants that are required to be addressed by the draft WMP. • Indicator Bacteria for San Gabriel River Reach 3 should be included as a Category 2 pollutant in accordance with the 2010 303(d) list. • Toxicity and pH for Rio Hondo should be included as Category 2 Pollutants in accordance with the 2010 303(d) list. • The draft WMP does not include Cyanide as a Category 2 pollutant though the WMP acknowledges water quality has been identified as having been impaired by Cyanide. The WMP needs to include Cyanide or explain why it was not included. • Lead, Odor, and Organic Enrichment/Low Dissolved Oxygen should be included as Category 2 pollutants for Peck Road Park Lake in accordance with the 2010 303(d) list, unless documentation confirming that there are no discharges from the City's

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment
	<p>MS4 to Peck Road Park Lake is included in the revised WMP.</p> <ul style="list-style-type: none"> • Trash for Legg Lake and Peck Road Park Lake don't need to be included as Category 2 pollutants as they are already included as Category 1 pollutants. <p><u>Category 3 Waterbody-Pollutant Combinations:</u></p> <ul style="list-style-type: none"> • The City's submittal does not summarize the findings from the review of Annual Reports, IC/ID reports, SWAMP, Industrial/Commercial Facility baseline exceedances information from SMARTS, which are data sources listed in Section 1.7.3 as being used by the City to identify waterbody-pollutant combinations with exceedances of water quality objectives. The WMP should be revised to include the findings from the review of these data sources. • The draft WMP should be revised to identify the applicable Receiving Water Limitations for Category 3 pollutants that are required to be addressed by the draft WMP. • The WMP should also potentially include diazinon and arsenic as Category 3 pollutants for Rio Hondo based on the tributary monitoring data from TS06. • Copper and Zinc for the Los Angeles River do not need to be included as Category 3 pollutants since they are already in Category 1. • Lead in the San Gabriel River does not need to be included as a Category 3 pollutant as it is already included as a Category 1 pollutant.
<p>Part VI.C.5.a.iii. Source Assessment (page 59-60)</p>	<ul style="list-style-type: none"> • The City's draft WMP lists a variety of data sources used in developing the source assessment but does not present the findings from these data sources. The WMP should be revised to present the findings from the review of the data sources identified in Section 1.6. • The draft WMP did not include data and conclusions from TMDL source investigations regarding known and suspected stormwater and non-stormwater pollutant sources in discharges to the MS4 and from the MS4 to receiving waters. The data and conclusions from TMDL source investigations regarding known and suspected stormwater and non-stormwater pollutant sources should be included in the draft WMP's source assessment.

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment
<p>Part VI.C.5.b. Selection of Watershed Control Measures (pages 61-64)</p>	<ul style="list-style-type: none"> • Section 1.8 of the draft WMP lists a general strategy to implement pollutant controls but few details are included and watershed control measures are not presented for the City's MS4 discharges to the San Gabriel River. Regional Board staff acknowledges that to a large degree the selection of watershed controls is based on the City's RAA, which indicates no pollutant reduction is required for the following pollutants: <ul style="list-style-type: none"> ○ Nitrogen-Peck Rd Park Lake ○ Lead-San Gabriel River ○ Copper, Zinc, and Lead-LA River ○ Nitrogen Compounds-LA River <p>However, some waterbody-pollutant combinations were omitted from the RAA, including cadmium in the LA River, non-stormwater discharges of copper, lead and zinc to the LA River, bacteria in the LA River and San Gabriel River, etc. Detailed comments on the City's RAA are provided in a separate memorandum.</p> • The draft WMP needs to include greater specificity in detailing how non-stormwater discharges will be identified and what measures will be taken to eliminate them, particularly in order to achieve applicable WQBELs for bacteria, copper, lead and zinc for non-stormwater discharges to the LA River per applicable interim and final compliance deadlines in the LA County MS4 Permit. • The draft WMP needs to include greater specificity on watershed control measures including how the pollutants identified in Categories 1, 2 and 3 are each addressed by the proposed control measures. • The draft WMP needs to include documentation demonstrating that the City's MS4 does not discharge to Peck Road Park Lake. • The draft WMP references trash control BMPs (full capture inserts) but does not reference any other control measures identified in TMDLs and corresponding TMDL implementation plans, specifically the Los Angeles River & Tributaries Total Maximum Daily Loads for Metals Final Implementation Plan for Reach 2 Participating Jurisdictions. • The draft WMP needs to ensure controls identified in TMDLs and TMDL Implementation plans are incorporated in the WMP. • Figure 1-7 in the draft WMP is fairly detailed; listing the location and type of structural controls proposed for implementation but the narrative language in the WMP is fairly general and does not match up with Figure 1-7. The WMP should be revised to include specific narrative language that is consistent with Figure 1-7. • Interim milestones for BMP implementation were only included for trash for the LA River and trash and nutrients for Legg Lake (Section 1.10). The WMP needs to be revised to include interim milestones for the implementation of each structural control and non-structural best management practice identified in Sections 1.8.3 and 1.8.4 and on Figure 1.7 to comply with interim and final compliance deadlines for the LA River metals and bacteria TMDLs as well as interim milestones for addressing pollutants in Categories 2 and 3. • The draft WMP needs to include documentation that the City has the necessary legal authority to implement the Watershed Control Measures identified in the WMP, or that other legal authority exists to compel implementation of the Watershed Control Measures. • The WMP does not specify a strategy for pollutants in Categories 2 and 3. Section 1.8 lists a general strategy that concludes with the statement, "The City will implement Watershed Control Measures based on the results of its watershed modeling and the necessary pollutant reductions." The WMP needs to be revised to specify a strategy for pollutants in Categories 2 and 3.

Issue and MS4 Permit Provision (Permit Page Number)	Regional Water Board Staff Comment
<p><i>Part VI.C.5.b. Selection of Watershed Control Measures (pages 61-64) continued</i></p>	<ul style="list-style-type: none"> As stated above, the RAA did not include all pollutants identified in Categories 1, 2 and 3, as required. The RAA needs to include these other pollutants and the City needs to propose appropriate BMPs in the WMP where the RAA indicates that load reductions for these pollutants are required.
<p>Reasonable Assurance Analysis – Category 1 Pollutants</p> <p>Part VI.C.5.b.iv.(5)</p>	<p>Not all Category 1 pollutants were included in the RAA. All Category 1 pollutants or surrogates need to be included in the RAA.</p>
<p>Reasonable Assurance Analysis – Categories 2 and 3 Pollutants</p> <p>Part VI.C.5.b.iv.(5)</p>	<p>The WMP did not model any pollutants in Categories 2 and 3. These pollutants or surrogates need to be included in the RAA.</p>

Los Angeles Regional Water Quality Control Board

TO: Mr. Frank Senteno, City Engineer
City of El Monte

FROM: C.P. Lai, Ph.D., P.E. and Thanhloan Nguyen
LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD

DATE: October 22, 2014

SUBJECT: COMMENTS ON DRAFT WATERSHED MANAGEMENT PROGRAM, SECTION 1.9, REASONABLE ASSURANCE ANALYSIS

This memorandum contains comments on Section 1.9 of the City of El Monte's Draft Watershed Management Program, "Reasonable Assurance Analysis" (RAA), dated June 2014, which was submitted by the City of El Monte.

- A. General comments on the draft Reasonable Assurance Analysis section of the Watershed Management Program.
1. Pursuant to Part VI.C.5.a.iv(1) and VI.C.5.b.iv.(3)-(4), pages 60 and 62-63 of the MS4 Permit, the City is subject to final water quality-based effluent limitations pursuant to (i) Attachment O, Part A "Los Angeles River Watershed Trash TMDL", Part B "Los Angeles River Nitrogen Compounds and Related Effects TMDL", Part C "Los Angeles River and Tributaries Metals TMDL", Part D "Los Angeles River Watershed Bacteria TMDL", Part E "Legg Lake Trash TMDL", Part G.7 "Legg lake System Nutrient TMDL, Part G.8 to 13 "Peck Road Park Lake Nutrient, PCBs, Chlordane, DDT, Dieldrin, and and Trash TMDLs", and (ii) Attachment P, Part A "San Gabriel River and Impaired Tributaries Metals and Selenium TMDL." As identified below, some pollutants with applicable water quality-based effluent limitations (WQBELs) appear to have been omitted from the RAA, including bacteria in the Los Angeles River and non-stormwater discharges of copper, lead and zinc to the Los Angeles River.
 2. The City has provided an evaluation of the existing water quality conditions for receiving water to which the City's MS4 discharges, including the Los Angeles River and San Gabriel River. However, lead for San Gabriel River and cadmium and nitrogen compounds for Los Angeles River were not summarized and included the receiving water characterization section (Section 1.2 of the draft Watershed Management Program). A summary of water quality conditions for these pollutants should be added to the revised WMP.
 3. The City has estimated nutrient baseline loading and the required reduction for Peck Road Park Lake. However, the City did not include any pollutant reduction plan to reduce nutrient loading to the lake based on the review of the City and LACFCD that

there is no direct or indirect discharge from the City to the Lake (Section 1.8.3 *TMDL Control Measures* of the draft WMP). The City must submit the record and evidence to support the City's conclusion that there are no MS4 discharges from the City to Peck Road Park Lake.

4. Model simulation for pollutants in Categories 2 and 3 was not included in the RAA.
- B. Modeling comments regarding analysis of dissolved copper, dissolved lead, dissolved zinc, and nitrogen loads for Los Angeles River; nitrogen and phosphorous loads for Legg Lake and Peck Road Park Lake; and dissolved lead loads for San Gabriel River:
1. The model predicted mass contributions of pollutants from the City shown in Table 1-6 through Table 1-14 and Figure 1-8 through Figure 1-11 are not consistent with those values directly from the model output (see attached Figure A. and Figure B. for an example) . As such, the conclusion that no pollutant reduction is required should be re-evaluated.
 2. The RAA did not include the model results for cadmium, nitrogen compounds and bacteria for Los Angeles River. There are too many uncertainties involved in converting modeled TSS concentrations to predicted concentrations of nitrate + nitrite as nitrogen, as presented in Table 1-9. The RAA should present instead the directly modeled concentrations of nitrate + nitrite as nitrogen. Additionally, the RAA should include model output for cadmium loading as is done for copper, lead and zinc loading to the Los Angeles River or alternatively, include the rationale on how cadmium loading will be addressed by addressing the other metals.
 3. Section 1.9 of the draft WMP did not describe how the model was calibrated, including calibration results compared to calibration criteria in Table 3.0 of the RAA Guidelines, and no historical hydrology and water quality monitoring data were used for comparison with the model results for the baseline prediction. According to Part G, pages 12-13 of the RAA Guidelines, model calibration is necessary to ensure that the model can properly assess all the variables and conditions in a watershed system.
 4. The 90th percentile wet year was selected. However, the report did not present the precipitation data and frequency analysis used to select the critical condition for the modeling. The input rainfall should be presented in the report and explain what the modeling periods are that are being simulated for the critical condition. Pursuant to Part B on pages 2-4 of the RAA Guidelines, a presentation of the process and data used for identifying critical conditions is needed prior to the modeling analysis. A summary of TMDL critical conditions relevant to MS4 discharges was provided in Appendix B of the RAA Guidelines for Permittees' reference.
 5. The report presents mass contributions of copper, lead and zinc, but does not present the runoff volumes and concentrations of those pollutants under the critical condition.
 6. The ID number for each of the 313 subwatersheds from the model input file must be provided and be shown in the simulation domain to present the geographic relationship of these subwatersheds within the surrounding watershed area and within the City's boundaries, which are simulated in the LSPC model.

7. Where pollutant reductions are necessary, the model output should include the storm water runoff volume, flow, water quality concentration and pollutant loads in time series at the jurisdictional boundary of each subwatershed for each BMP scenario as well (See Table 5. Model Output for Both Process-based BMP Models and Empirically-based BMP Models, pages 20-22 of the RAA Guidelines).
8. Per the RAA Guidelines, the required load reduction should be evaluated at the jurisdictional boundary of each subwatershed to demonstrate that the proposed control measures will ensure that the City's MS4 discharges achieve effluent limitations and do not cause or contribute to exceedances of receiving water limitations. The BMP performance model proposed in the RAA Guidelines should be used to predict the pollutant reduction for the proposed BMPs.
9. Model simulation under the dry weather condition for dissolved copper, lead and zinc for Los Angeles River and for bacteria in the Los Angeles River was not included in the RAA.

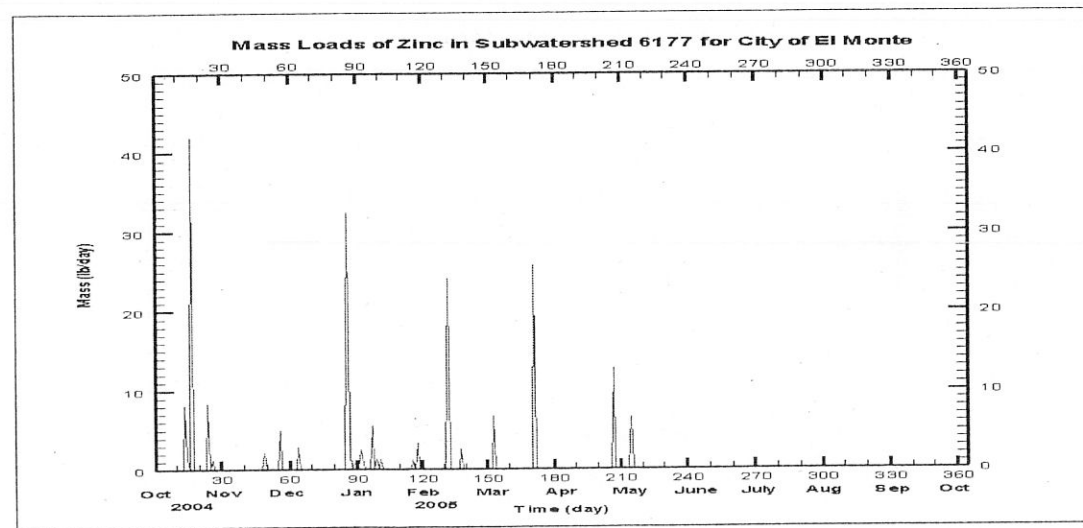
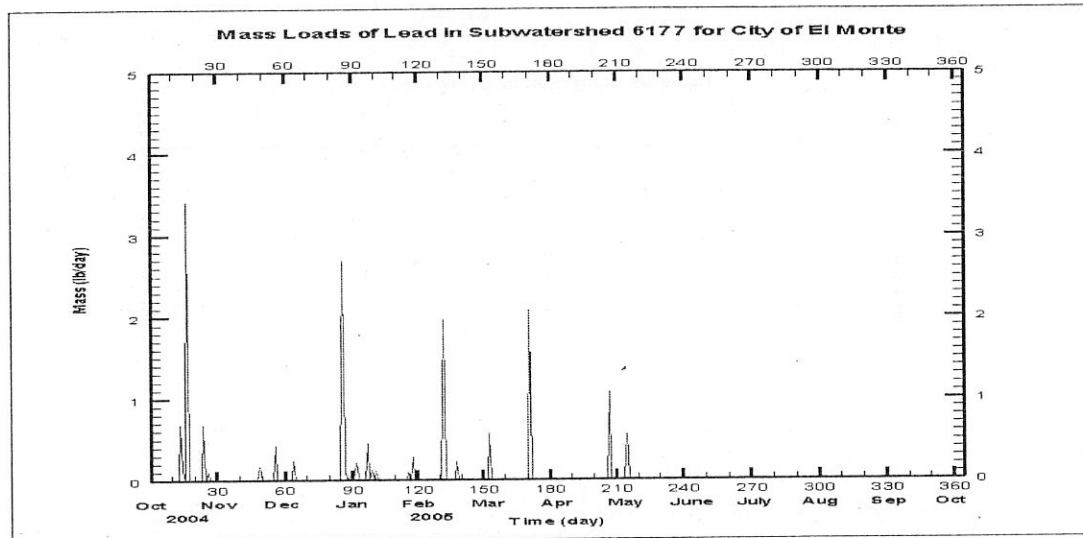
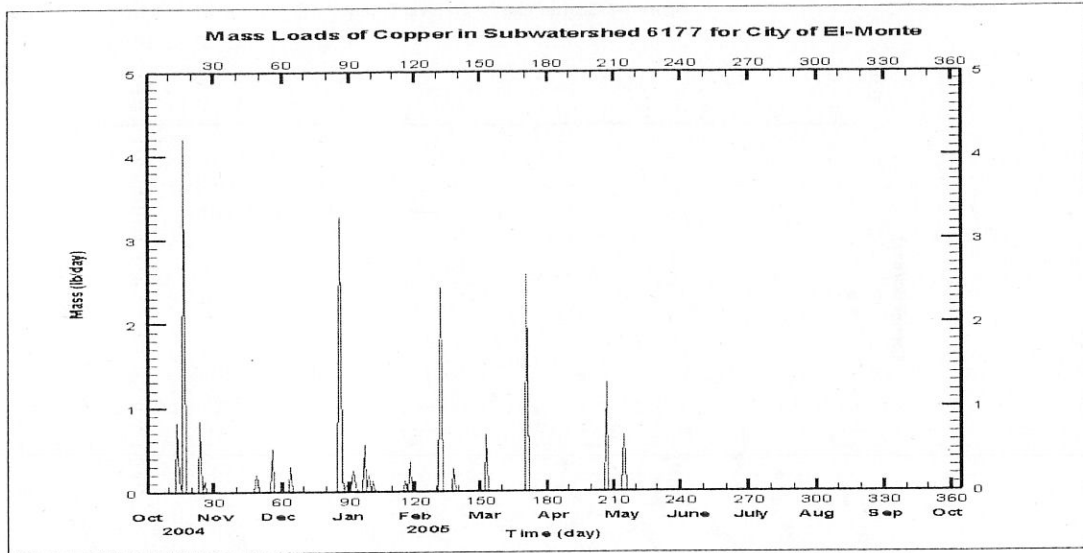


Figure B. Model predicted results directly from the output file for City of El Monte