
Los Angeles Regional Water Quality Control Board

December 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 INTEGRATED MONITORING PROGRAM, PURSUANT TO PART VI.B AND ATTACHMENT E PART IV.B 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 Integrated Monitoring Program (IMP) 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 and implement, in coordination with an approved Watershed Management Program per Part VI.C, a customized monitoring program that achieves the five Primary Objectives set forth in Part II.A of Attachment E and includes the elements set forth in Part II.E of Attachment E. Customized monitoring programs may be developed on an individual jurisdictional basis, referred to as an Integrated Monitoring Program (IMP). These programs must be approved by the Executive Officer of the Regional Water Board.

The Regional Water Board has reviewed the draft IMP and has determined that, for the most part, the IMP includes the elements set forth in Part II.E and will achieve the Primary Objectives set forth in Part II.A of Attachment E of the LA County MS4 Permit. However, some additions and revisions to the IMP are necessary. The Regional Water Board's comments on the IMP, including detailed information concerning necessary additions and revisions to the IMP, are found in Enclosure 1 and Enclosure 2.

Regional Board staff review of the draft IMP reveals that the City states that it will be participating with four other groups on CIMPs to meet its obligations to conduct receiving water monitoring, including TMDL monitoring requirements in the receiving waters to which its MS4 discharges. The City's IMP cannot be approved without the Regional Board having copies of the final agreement between the City and those other groups to collaborate on the CIMPs, so

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

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that it is clear that the City is meeting all of the requirements of Attachment E through the combination of its IMP and the 4 CIMPs it is participating in.


Please make the necessary additions and revisions to the IMP as identified in the enclosures to this letter and submit the revised CIMP as soon as possible and no later than **March 22, 2015**. The revised IMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised El Monte IMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov.

Upon approval of the revised IMP by the Executive Officer, the Permittees must prepare to commence their monitoring program within 90 days. If the necessary revisions are not made, the Permittees must comply with the Monitoring and Reporting Program (MRP) and future revisions thereto, in Attachment E of the LA County MS4 Permit.

Until the IMP is approved by the Executive Officer, the monitoring requirements pursuant to Order No. 01-182 and MRP CI 6948, and pursuant to approved TMDL monitoring plans shall remain in effect for the Permittees.

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:

Enclosure 1 – Summary of Comments and Necessary Revisions to Draft IMP

Enclosure 1 to December 22, 2014 Letter Regarding the City of El Monte's Draft Integrated Monitoring Program

Summary of Comments and Required Revisions to the Draft Integrated Monitoring Program

IMP Reference	MRP Element/ Reference (Attachment #)	Comment and Necessary Revision
Section 1.3.4.10	Analysis Methods Att. D Part III.B page D-5	<p>The draft IMP references methods set forth in 40 CFR Part 136 consistent with requirements in Attachment E but does not specify that PCB analysis should be for congeners (and arachlors if following Table E-2). Monitoring for PCBs in sediment or water should be reported as the summation of aroclors and a minimum of 40 (and preferably at least 50) congeners. See Table C8 in the state's Surface Water Ambient Monitoring Program's Quality Assurance Program Plan (Page 72 of Appendix C), which can be downloaded at http://www.waterboards.ca.gov/water_issues/programs/swamp/docs/qapp/qaprp082209.pdf for guidance. It is preferable samples be analyzed using EPA Methods 8270 or 1668C (as appropriate), and High Resolution Mass Spectrometry.</p> <p>Note that for mercury, Method 245.7 or 1631E should be utilized (not 245.1) to get sufficiently sensitive minimum levels for analytical results to be compared with the water quality objective.</p> <p>In addition the draft IMP relies upon two adjacent CIMPs (USGR EWMP Group and Rio Hondo/SGR WQ Group) and two downstream CIMPs (Lower LAR and Lower SGR) to fulfill Receiving Water Monitoring and TMDL monitoring requirements. The draft IMP needs to be revised to include a demonstration that the Receiving Water monitoring sites and TMDL monitoring sites listed in the adjacent CIMPs are appropriate for the City of El Monte to use for those purposes.</p>
Section 1.3.3	Outfall Monitoring Att. E Part II.E.2 page E-4	<p>The draft IMP notes,</p> <p><i>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:</i></p> <ul style="list-style-type: none"> • <i>7% office</i> • <i>10% industrial/commercial</i> • <i>11% retail</i> • <i>58% residential</i> • <i>14% other amenities</i> <p><i>The selected outfalls are exclusive to the City. The selected outfalls will not receive drainage from another jurisdiction so the City will not have to conduct "upstream" and "downstream" monitoring as the system enters and exits the City's jurisdiction.</i></p> <p>Though HUC 12 boundaries are included on the maps of the outfall locations there was no land use overlay on the outfall location maps, or more importantly a tabular comparison of the land use breakdown within the drainages specific to the outfall locations and the larger HUC-12 drainage area(s) within the City that the outfall location is intended to represent. This tabular comparison should be provided for each of the proposed outfall monitoring locations to validate the statement that the outfall locations are appropriately representative.</p>

Enclosure 1 to December 22, 2014 Letter Regarding the City of El Monte's Draft Integrated Monitoring Program

Summary of Comments and Required Revisions to the Draft Integrated Monitoring Program

Section 1.3.1	Receiving Water Monitoring Att. E Part VI.A.1.a page E-13	The IMP does not include Receiving Water monitoring but states, <i>The City will collaborate with the Upper San Gabriel River EWMP Group on the RW/TMDL monitoring in the San Gabriel River. The City will also collaborate with the Rio Hondo/San Gabriel River Water Quality Group on RW/TMDL monitoring in the Rio Hondo (tributary to the LA River).</i> It should be noted that approval of these Plans is pending and should either of these Plans not receive an approval, the City of El Monte would be responsible for complying with all Receiving Water monitoring requirements.
Section 1.3.1	TMDL Monitoring Att. E Parts VI.A.1.b.iii and VI.B.2.a page E-14	While the IMP identifies applicable TMDLs, the IMP does not propose Receiving Water monitoring but states, <i>The City will collaborate with the Upper San Gabriel River EWMP Group on the RW/TMDL monitoring in the San Gabriel River. The City will also collaborate with the Rio Hondo/San Gabriel River Water Quality Group on RW/TMDL monitoring in the Rio Hondo (tributary to the LA River).</i>
Section 1.3.1	Receiving Water Monitoring Att. E Part VI.C.1.b.i & VI.C.1.b.ii page E-15	The draft CIMP does not clearly state what wet-weather conditions trigger receiving water monitoring. The IMP does not include Receiving Water monitoring but states, <i>The City will collaborate with the Upper San Gabriel River EWMP Group on the RW/TMDL monitoring in the San Gabriel River. The City will also collaborate with the Rio Hondo/San Gabriel River Water Quality Group on RW/TMDL monitoring in the Rio Hondo (tributary to the LA River).</i>
Section 1.3.4.9	Dry Weather Outfall Monitoring Att. E Part VI.D.1.a page E-16	The draft IMP did not specify that one dry weather monitoring event occur during the month with the historically lowest instream flows, or where instream flow data are not available, during the historically driest month for outfall monitoring. The draft IMP needs to be revised to comply with that requirement.
Section 1.3.4.10	Analytical Parameters Att. E Parts VIII.B.1.c & VIII.B.1.d pp. E-22 & E-23	While the IMP states, <i>The IMP will incorporate all the requirements of Attachment E of the Order regarding the Minimum Storm Water Outfall based Monitoring Requirements,</i> the monitoring parameters for each outfall monitoring location need to be clearly specified. The draft CIMP needs to require monitoring of pollutants identified in a TIE conducted at the downstream receiving water monitoring station during the most recent sample event, or where the TIE conducted on the receiving water sample was inconclusive, aquatic toxicity. If the discharge exhibits aquatic toxicity, then a TIE shall be conducted. In addition to that requirement, The draft CIMP needs to require monitoring of Other parameters in Table E-2 identified as exceeding the lowest applicable water quality objective in the nearest downstream receiving water monitoring station. The draft CIMP needs to specify the process that will be used to ensure these requirements are met.
Section 1.3.3 & Section	Outfall Monitoring Att. E	While the IMP states, <i>The IMP will incorporate all the requirements of Attachment E of the Order regarding the Minimum Storm Water Outfall based Monitoring Requirements,</i> the wet weather conditions

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1.3.4.9	Parts VIII.B.1.b.i & VIII.B.1.b.ii page E-22	that trigger outfall monitoring need to be clearly specified (i.e. When the receiving water body is a river, stream or creek, wet weather shall be defined as when the flow within the receiving water is at least 20 percent greater than the base flow or an alternative threshold as provided for in an approved IMP or CIMP, or as defined by effective TMDLs within the watershed.).
Section 1.3.3	Outfall Monitoring Att. E Part VIII.C.1 page E-23	The IMP states, <i>grab samples will be collected for all outfall monitoring. It is not anticipated that composite sampling at the outfall monitoring locations is warranted.</i> No rationale was provided why compositing would not be necessary in wet weather. The draft IMP needs to be revised to include a rationale on why compositing is not necessary during wet weather monitoring.
Section 1.3.4	Non-Storm Water Outfall Monitoring Att. E Part IX.H.2 page E-28	The IMP states, <i>grab samples will be collected for all outfall monitoring. It is not anticipated that composite sampling at the outfall monitoring locations is warranted.</i> The draft IMP needs to be revised to include a rationale on why compositing is not necessary.
Section 1.3.1 & Section 1.3.4.9	Toxicity Monitoring	The IMP states, <i>Aquatic toxicity will be monitored in accordance with Part XI of the MRP.</i> Additionally, <i>the IMP states, The IMP will incorporate all the requirements of Attachment E of the Order regarding the Minimum Storm Water Outfall based Monitoring Requirements.</i> As stated in the comment above regarding Analytical parameters, the draft CIMP needs to require monitoring of pollutants identified in a TIE conducted at the downstream receiving water monitoring station during the most recent sample event, or where the TIE conducted on the receiving water sample was inconclusive, aquatic toxicity. If the discharge exhibits aquatic toxicity, then a TIE shall be conducted.