

Los Angeles Regional Water Quality Control Board

January 22, 2016

Mr. Mitchell G. Lansdell
City Manager
1700 W. 162nd St., Room 112
P.O. Box 47003
Gardena, CA 90247

APPROVAL, WITH CONDITIONS, OF THE CITY OF GARDENA'S INTEGRATED MONITORING PROGRAM, PURSUANT TO ATTACHMENT E, PART IV.A OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Mr. Lansdell:

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board) has reviewed the 2nd revised monitoring program submitted on September 23, 2015 by the City of Gardena (City). This monitoring 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 an integrated monitoring program (IMP) 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. These programs must be approved by the Executive Officer of the Los Angeles Water Board.

The Los Angeles Water Board has reviewed the City's 2nd revised IMP and has determined that, once modified per the conditions below and as detailed in the attachment to this letter, the IMP will include the elements set forth in Part II.E of Attachment E and will achieve the Primary Objectives set forth in Part II.A of Attachment E of the LA County MS4 Permit.

Public Review and Comment

On July 3, 2014, the Board provided public notice and a 46-day period to allow for public review and comment on the City's draft IMP. A separate notice of availability regarding the draft IMPs, including the City's IMP, was directed to State Senators and Assembly Members within the Coastal Watersheds of Los Angeles County. The Board received three comment letters that had comments applicable to the City's draft IMP. One joint letter was from the Natural Resources Defense Council (NRDC), Heal the Bay, and Los Angeles Waterkeeper, and the other letters were from the Construction Industry Coalition on Water Quality (CICWQ), and Joyce Dillard, a private citizen. During the review of the draft and revised IMP, the Los Angeles Water Board considered those comments applicable to the City's proposed IMP.

Los Angeles Water Board Review

Concurrent with the public review, the Los Angeles Water Board, along with U.S. EPA Region IX staff, reviewed the draft IMPs. On January 16, 2015 and August 10, 2015, the Los Angeles Water Board sent a letter to the City detailing the Board's comments on the draft and revised IMP, respectively, and identifying the revisions that needed to be addressed prior to the Board's approval of the City's IMP. The letters directed the City to submit a revised and 2nd revised IMP, respectively, addressing the Los Angeles Water Board's comments. The City submitted its revised and 2nd revised IMPs on February 17, 2015 and September 23, 2015, respectively, for Los Angeles Water Board review and approval. Subsequent to the City's submittal of its 2nd revised IMP, the Los Angeles Water Board staff had telephone and email exchanges with the City's representatives and consultants to discuss the Board's remaining comments and necessary revisions to the IMP.

The Los Angeles Water Board hereby approves, subject to the following conditions, the City's September 23, 2015 revised IMP¹. The Board may rescind this approval if all of the following conditions are not met to the satisfaction of the Board within the timeframe provided below.

1. Attached to this letter is the City's IMP with the Los Angeles Water Board Executive Officer's conditions of approval shown in tracked changes and comment balloons. Accept all changes and revise the IMP to address all comments in the comment balloons.
 - a. These conditions include, but are not limited to, ensuring that the final IMP addresses the monitoring and reporting requirements (including data collection and analysis) for the Dominguez Channel and Dominguez Channel Estuary per Section C of Part XIX. This requirement was previously discussed in the Los Angeles Water Board's comment letter dated August 10, 2015 (see pgs. 7-9), and is again identified in comment balloons [ER3] and [PR20] of Attachment 1.

In separate correspondence dated August 07, 2015, to all Permittees developing Coordinated Integrated Monitoring Programs (CIMPs) and IMPs, the Los Angeles Water Board provided clarification of requirements for toxicity monitoring – specifically regarding additional toxicity monitoring upstream and at outfalls where toxicity is identified during a sampling event at a receiving water monitoring site. This previous correspondence is attached.

The City shall submit a final IMP to the Los Angeles Water Board that satisfies all of the above conditions no later than **February 22, 2016**. Pursuant to Attachment E, Part IV.C.6 of the LA County MS4 Permit, the City must commence implementing its monitoring program within 30 days after this approval of the final IMP (i.e. no later than February 21, 2016). Please note that the City is responsible for complying with all reporting provisions included in Attachment E, Part XIV – XVIII, Section C of Part XIX, "Reporting Requirements for Dominguez Channel and Greater Harbors Waters WMA TMDLs", and Attachment D, Sections IV, V, and VII.A of the LA County MS4 Permit. Additionally, the City is also responsible for complying with the following requirements under Annual Reporting and Adaptive Management.

Annual Reporting

¹ Note that the 2nd Revised IMP reflects a date of 6/28/14 in the footer, but was submitted by the City as its 2nd Revised IMP on 9/23/15.

The Annual Report shall provide an Integrated Monitoring Report that summarizes all identified exceedances of:

- outfall-based stormwater monitoring data,
- wet weather receiving water monitoring data,
- dry weather receiving water monitoring data, and
- non-storm water outfall monitoring data

against all applicable receiving water limitations, water quality-based effluent limitations, non-storm water action levels, and aquatic toxicity thresholds as defined in Sections XII.F and G of this MRP. All sample results that exceeded one or more applicable thresholds shall be readily identified.

The Annual Report shall also include a Municipal Action Level (MAL) Assessment Report, which shall present the stormwater outfall monitoring data in comparison to the applicable MALs, and identify those subwatersheds with a running average of twenty percent or greater of exceedances of the MALs in discharges of stormwater from the MS4. Please note that beginning in Year 3 after the effective date of the LA County MS4 Permit, each Permittee or City of Permittees shall submit a MAL Action Plan with the Annual Report to the Los Angeles Water Board Executive Officer, for those subwatersheds with a running average of twenty percent or greater of exceedances of the MALs in any discharge of storm water from the MS4.

Adaptive Management

The Los Angeles Water Board or its Executive Officer, consistent with 40 CFR section 122.41, may approve changes to the Monitoring and Reporting Program, after providing the opportunity for public comment, either:

1. By request of the City or by an interested person after submittal of the Monitoring Report. Such request shall be in writing and filed not later than 60 days after the Monitoring Report submittal date, or
2. As deemed necessary by the Los Angeles Water Board Executive Officer, following notice to the City.

As part of the adaptive management process, any modifications to the IMP must be submitted to the Los Angeles Water Board for review and approval. The City must implement any modifications to the IMP upon approval by the Los Angeles Water Board or its Executive Officer, or within 60 days of submittal of modifications if the Los Angeles Water Board or its Executive Officer expresses no objections. Note that the City's Report of Waste Discharge (ROWD) is due no later than July 1, 2017. To align any modifications to the IMP proposed through the adaptive management process with permit reissuance, results of the first adaptive management cycle should be submitted in conjunction with the City's ROWD.

If you have any questions, please contact Ms. Erum Razzak of the Storm Water Permitting Unit by electronic mail at Erum.Razzak@waterboards.ca.gov or by phone at (213) 620-2095. Alternatively, you may also 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 - City of Gardena's Revised IMP with the Executive Officer's Conditions of Approval Shown in Tracked Changes and Comment Balloons

Attachment 2 - Memorandum from Executive Officer to LA County MS4 Permittees Clarifying Aquatic Toxicity Monitoring Requirements

cc: Mr. John Felix, City of Gardena
Mr. Ray Tahir, TECS Environmental Inc.

Section One Monitoring and Reporting Program (MRP)

1.0 Summary

The Los Angeles County MS4 permit (Order R4-2012-0175) includes compliance with a Monitoring and Reporting Program (No. CI-6948), (MRP). The MRP addresses the several types of monitoring tasks required by the permit. The City intends to meet these requirements through its **Integrated Monitoring Program** (IMP) submittal.

~~In addition to the above monitoring tasks, the City is also subject to monitoring tasks required by the Stormwater Management Program (SWMP), which is not referenced in the MRP section. Essentially, these provisions require monitoring of stormwater discharges against water quality standards that are not TMDLs either contained in the basin plan or based on federal regulations.~~ The purpose of the monitoring is to facilitate an evaluation of the adequacy of control measures in meeting the specified limitations. The LA County MS4 Permit Attachment E Table E-2 as well as Attachment L-R specifies the applicable receiving water limitations and water quality based effluent limitations to which MS4 discharges are subject. They can be taken from the current permit 'The LA County MS4 permit No. R4-2012-0175' under the MS4 permit's MRP under Attachment E.

All pollutants subject to monitoring will be loaded into the RAA/Water Quality Model to evaluate to what extent the City is persistently exceeding TMDLs and other water quality standards and identify BMPs that are necessary to preventing such exceedances.

~~As is explained in the IMP, there are several provisions of the permit reflected in the MRP and IMP that the City cannot comply with because the City has challenged them in its administrative petition. These include, most notably, non-storm water action levels. The City expects these issues to be~~



resolved through a State Board order in response to an administrative petition it filed challenging this and other MS4 permit requirements.

1.1 Integrated Monitoring Program

The City is subject to an Integrated Monitoring Program (IMP) to comply with monitoring ~~and SWMPAWMP~~ requirements under the MS4 permit. In accordance with the MRP, the IMP includes the following elements: (1) receiving water monitoring; (2) storm water outfall based monitoring; (3) non-storm water outfall based monitoring; ~~and (4) new development/re-development effectiveness tracking; (4) compliance with municipal action level (MAL) parameters;~~ and (5) regional studies.

It is important to note that the City has gone on record and argued in its administrative petition about the permit's excessive monitoring requirements which it argues are arbitrary and capricious and exceed federal stormwater regulations. These include any monitoring activity that is located outside an MS4 [toxicity, wet weather TMDL WLAs, regional studies, toxic investigation evaluation (TIE), etc.]; and dry weather monitoring (dry weather minimum levels, non-stormwater outfall monitoring, and non-stormwater action levels). In the alternative, the City will comply with federal field screening requirements for non-stormwater discharges, the purpose of which are to detect and eliminate illicit discharges and illicit connections.

1.2 IMP Requirements

Through the **Integrated Monitoring Program** the City proposes to consolidate applicable monitoring program requirements as specified in Attachment E of the MS4 permit, which *provides flexibility to allow Permittees to coordinate monitoring efforts on a watershed or sub-watershed basis to leverage monitoring resources in an effort to increase cost-efficiency and*



effectiveness and to closely align monitoring with TMDL monitoring requirements and Watershed Management Programs.

Table I – Cost Sharing Participation

Watershed/Sub-watershed	Participating MS4s
<ul style="list-style-type: none"> • Dominguez Channel (unlined portion below Vermont) 	<ul style="list-style-type: none"> • City of Compton • City of Gardena

Comment [ER1]: If cities listed here are not cost sharing on monitoring, omit Table I to avoid confusion on formal cost sharing by the cities versus cost savings realized by using a single consultant.

~~Though the SWAMP should be responsible for performing ambient monitoring, it is not known when, if ever, it intends to conduct ambient monitoring in these reaches. In the meantime, the City recognizes that the ambient monitoring approach will yield accurate data needed to evaluate the beneficial uses and facilitate compliance with ambient TMDL WLAs and other water quality standards.~~

~~The City does not plan to use a collaborative approach to pay for monitoring in the receiving water to determine compliance with wet weather TMDLs. This is because it opposes having to comply with wet weather standards in the receiving water. TMDLs and other water quality standards are ambient, dry weather standards, not wet weather standards, the latter of which are not required to determine compliance under federal and state law.~~

GIS maps have been developed to depict the geographic boundaries of the monitoring plan including the receiving waters, the MS4 catchment drainages, storm drains, and outfalls, sub-watershed boundaries, political boundaries, land use, and the proposed receiving water monitoring stations for both dry weather and wet weather ~~receiving water~~ monitoring (see **Appendix A, Maps**).

1.3 Receiving Water Monitoring



The MS4 permit requires receiving water monitoring to be performed at in-stream mass emissions stations; additional receiving water compliance points approved by the Regional Board's Executive Officer; and additional locations that are representative of impacts from MS4 discharges. The objectives of receiving water monitoring are:(1) determine if receiving water limitations are being achieved; (2) assess trends in pollutant concentrations over time; and (3) determine whether the designated beneficial uses are fully supported based on water chemistry, as aquatic toxicity and bio-assessment monitoring.

~~The City's receiving water monitoring plan shall be limited to utilizing existing ambient water quality data developed by the Regional Board's Surface Water Ambient Monitoring Program (SWAMP) and data generated by other agencies including, but not limited to, the Council for Watershed Health (CWH) and the Sanitation Districts of Los Angeles County (SDLAC).~~

~~The City cannot participate in any receiving water monitoring activity or action that takes place outside of its MS4. As the City's administrative petition and Writ of Mandate effectively argue, the receiving water is not part of the MS4. The City's responsibility for monitoring ends at the discharge from the outfall before it reaches the receiving water.~~

~~The City has also argued in its petition and writ that federal storm water regulations and judicial decisions affirm that MS4 permit compliance with water quality standards (WQS) is determined at the outfall — not in the receiving water. In other words, the regulatory "range" of an MS4 permit ends in storm water discharge from the outfall before it reaches the receiving water.~~

~~It should be noted that the 9th Circuit Court of Appeal in NRDC v. LAGFCD made it very clear that the compliance determinant for MS4 discharges is at the outfall — not the receiving water. The 9th Circuit agreed with a lower federal court ruling that held violations cannot be determined in~~



~~the receiving water because of evidentiary challenges — how can one prove that a permittee caused exceedances in receiving waters that these waters also receive stormwater discharges from other sources? The 9th Circuit also said if a violation is to be determined it must be based on discharges from the outfall.~~


~~Further, there is nothing in federal law or USEPA guidance, or state law that authorizes compliance with TMDL WLAs or other water quality standards based on wet weather monitoring of receiving waters. According to State Water Quality Order 2001-0015: *There is no provision in state or federal law that mandates the adoption of separate water quality standards for wet weather conditions.* TMDLS and water quality standards are not and cannot be wet weather standards — they are ambient (dry weather) standards. Sampling a wet weather discharge from a receiving water (not be confused with an outfall) against an ambient standard is unrealistic and serves no purpose.~~

~~There is also no benefit to performing receiving water monitoring to determine compliance with wet weather TMDL WLAs or to assess the health of the receiving water. Pollutants during a storm event emanate from a variety of sources including but not limited to: permitted facilities such as industrial and construction sites; various municipal point sources; non-municipal point sources (e.g., sewage treatment plants) and non-point sources including atmospheric deposition. It would be impossible to determine which of these dischargers was responsible for exceeding a wet weather WLA, which again is not legally valid in any case. It should be clear that monitoring during a significant storm event would be of no value in assessing the health of the receiving water. In fact, it is the worst time to monitor. The City will, nevertheless, rely on in-stream ambient monitoring to assess the impact of the SWMP/WMP on beneficial uses of the receiving waters into which it discharges.~~



However, The Regional Board states in their comments (received on January 16, 2015) that data from the SWAMP and the aforementioned agencies are not sufficient to fulfill the requirements of the LA County MS4 Permit. Therefore, The City will conduct wet and dry weather Ambient monitoring from receiving water from Dominguez Channel and at South Vermont Avenue. The Upstream tributary area is 14.6 square miles and is located in a concrete-lined rectangular channel. All analyses required by the NPDES permit (including relevant TMDLs) would will be monitored at this site.

Table II – Summary of NPDES Receiving Water (Ambient) Monitoring Sites

Site ID	Site	Coordinates	Catchment Area (square miles)	City's Area (square miles)	Picture
R1	Dominguez Channel @ Vermont Ave.	33.871472, -118.290794	14.58	5.87	

Comment [ER2]: Alternatively, the City can use data (free and readily available to any city) from the LA County Mass Emissions station S28 which is located on Dominguez Channel at Artesia Blvd. If the City chooses to do so, update Table II and the text above.

Comment [ER3]: As per the Harbor Toxics TMDL, the City is required to do TMDL monitoring in Dominguez Channel Estuary. The City can individually do the monitoring (as stated in the TMDL and also specified in the Regional Board's last letter to the City dated 8/10/15 (see p. 6-9)). Propose a TMDL compliance monitoring site for Dominguez Channel Estuary in proximity to the City's point of discharge (such as downstream of BI0074 storm drain discharge point to the Dominguez Channel Estuary). Alternatively, the City should cost/data share with the Dominguez Channel EWMP Group who has an approved CIMP and will be conducting the required monitoring. If the City chooses to do the latter, the City must provide a copy of the cost/data share agreement between the City and the Dominguez Channel EWMP Group.

1.4 Storm Water Outfall-Based Monitoring

The City is committed to stormwater monitoring at the outfall in accordance with federal stormwater regulations. Outfall monitoring will be limited-used to: (1) aiding in determining determine compliance with WQBELs (TMDL WLAs and other water quality standards measured against ambient standards); and (2) evaluating evaluate stormwater discharges against Municipal Action Levels (MALs); and (3) determine wither the City's discharge causes or contributes to an exceedance of receiving water limitations. Once again, there is no support for the legitimate existence of a wet weather TMDL or any water quality standard and the purpose of the MALs is unclear and appears to be superfluous. However, The City would be willing to comply with MAL monitoring if offered as an alternative to conventional monitoring for compliance purposes.



The City has identified one outfall from which discharges are released to Dominguez Channel. However, the City cannot sample from outfalls because: (1) they are located on property owned and operated by County of Los Angeles Flood Control District (LACFCD); and (2) it would be physically impossible to draw a grab sample from them.

Federal regulations allow monitoring to be conducted at representative field screening points which, along with outfalls, are illustrated on **Appendix A-1**. ~~Four~~Three screening points have been selected for Dominguez Channel (above Vermont Avenue). Each located upstream of five outfalls. Ordinarily, each of the outfalls would be sampled from upstream storm drain locations. However, two of the outfalls cannot be accessed to serve as field screening points. No outfall prioritization of the field screening points is necessary because all of them are upstream of the outfalls from which the City discharges to Dominguez Channel.

Outfall Discharging into Receiving Water



The field screening points are representative of discharges from the City which are a mix of residential, commercial, and industrial land uses. Stormwater discharges from the outfall field screening points will be measured against ~~ambient TMDL standards~~ WQBELs and MALs. ~~The ambient standard is one that is required to assure that beneficial uses of receiving waters are protected against impairment.~~ Sampling results will be reported to the

Comment [ER4]: Although the IMP claims that each of the field screening points is representative of land uses within the City's jurisdiction, there is insufficient justification for selection of the points. To provide sufficient justification that the field screening points are representative of the City's land use, the City must provide a land use map that shows the catchment area (also known as the drainage area) for each field screening point. Additionally, a brief written justification should be given on why each of the field screening points best represent the City's land use using Table III, IV, and V as justification.



Regional Board ~~semi-annually. If persistent exceedances of the ambient standards are detected, the iterative process will be triggered.~~

Comment [PR5]: See Part XIV.L of Attachment E. Note, however, that in light of the Board's paperless office protocols, the results should be transmitted to losangeles@waterboards.ca.gov with the subject line: LA County MS4 Permit – Gardena IMP Monitoring Data Submittal, NOT to MS4stormwaterRB4@waterboards.ca.gov

The City plans to conduct stormwater outfall monitoring three times a year during the wet ~~weatherseason (October 1 through May 15), with at least one month in between~~ in accordance with 40 CFR §122.21(g)(7). The City falls within two HUC 12 drainage area, Upper Dominguez Channel and Lower Dominguez Channel. There ~~areis only one field screening point located in Upper Dominguez Channel HUC 12 drainage area and another two field screening points are located in lower Dominguez channel HUC 12 drainage area.~~ City will conduct sampling from each field screening points ~~located in each of the HUC 12 drainage areas~~ to provide a representative characterization of City stormwater outflows ~~measured against ambient standards~~. At the end of the 5 year term of the permit, the City will be able to evaluate ~~persistent~~ exceedances of ~~TMDLs-WQBELs~~ and other water quality standards and propose adjustments to BMPs and other actions in the Report of Waste Discharge (ROWD). The MS4 permit reapplication is due to the Regional Board 180 days prior to the expiration of the current permit (~~May of July 1, 2017~~).

~~Although the City will use the data to determine compliance with WQBELs, expressed as ambient TMDL WLAs and to measure stormwater discharges against municipal action levels (MALs), it cannot sanction the use of the data to determine compliance with TMDL WLAs in the receiving water. As mentioned, the City is not responsible for conducting any monitoring or any activity outside the realm of its MS4. Further, as also mentioned, the City cannot measure stormwater discharges from the outfall against wet weather water quality standards because they are not legally valid.~~

Comment [ER6]: The regional board will determine compliance based on the evaluation of monitoring data as per the LA County MS4 Permit. For Dominguez Channel TMDL compliance determination, refer to Attachment N Part E.4 – page N-8 to N-9.

Table III provides Land Use the Breakdown for the City of Gardena. Table IV provides land use breakdown for the HUC-12 drainage area. Table V



shows the drainage area of land use that each outfall area covers. The City has chosen to use ~~a total twofour~~ field screening points for monitoring purposes. The City of Gardena falls into two HUC 12 Upper Dominguez Channel and Lower Dominguez Channel. There is only one field screening point located in upper Dominguez Channel drainage area. There are 3 field screening points located in lower Dominguez Channel. The City will choose two sampling locations ~~in each HUC 12 drainage area every year for monitoring purpose.~~ Hence, Field Screening points #3 and 41 will be sampled three times a year, every year, ~~and Field Screening Points #2, #3, and #4 will be sampled three times a year on a rotating basis.~~ Table VI shows the land use breakdown for each outfall drainage area.

Comment [ER7]: It appears that field screening point # 1 captures too much industrial land use from outside the City's jurisdiction. Hence, omit this field screening point. Note that field screening points # 3 and 4 will capture similar land uses to the City's jurisdictional area in the Upper Dominguez Channel HUC-12, and therefore may be used to represent the City's area in the Upper Dominguez Channel HUC-12.

Comment [ER8]: Omit field screening points # 1 and 2. Sample field screening points 3 and 4 three times per year every year.

The City does not have any open channels other than the Dominguez Channel or underground pipes 18 inches or greater in diameter. Furthermore, the City does not have any dry weather diversions within its' jurisdiction.

Table III – Land Use Breakdown

Land Use Category	Area (Acre)	Percentage
Residential	1593.2	42.5%
Mixed-Use (Residential/Commercial)	37.3	1%
Commercial	454.3	12.1 %
Industrial	550	14.7 %
Agriculture	47.6	1.3%
Transportation	809.9	21.6 %
Public	211.7	5.6 %
Vacant	44.8	1.2%
Total	3749	100%

Table IV – Land Use Breakdowns for HUC 12 Drainage Areas

Land Use Type	Drainage Area (Acres & Percentage)	
	HUC 12 Drainage area (Upper Dominguez Channel)	HUC 12 Drainage area (Lower Dominguez Channel)
	576 Acre	3173 Acre
Residential	156.8 (4.2%)	1436.4 (38.3%)
Agriculture	0.4 (0.01%)	47.5 (1.29%)



Commercial	62.5 (0.2%)	391.8 (11.9%)
Industrial	176.3 (4.7%)	373.7 (10%)
Transportation	155 (4.1%)	654.9 (17.5%)
Vacant	0 (0%)	44.8 (1.2%)
Public	25 (0.7%)	186.7 (4.9%)
Mixed-Use (Residential/Commercial)	0 (0%)	37.3 (1%)

Table V – Land use breakdown of Field Screening Points Drainage area

Land Use Type	M1 Drainage Area(Acre)	M2 Drainage Area(Acre)	M3 Drainage Area(Acre)	M4 Drainage Area(Acre)
Residential	156.8 (4.2%)	359.1 (9.6%)	502.74 (13.4%)	574.6 (15.3%)
Agriculture	0.4 (0.01%)	9.5 (0.26%)	16.6 (0.45%)	21.4 (0.58%)
Commercial	62.5 (0.2%)	97.9 (3%)	137.13 (4.2%)	156.8 (4.5%)
Industrial	176.3 (4.7%)	93.3 (2.5%)	130.8 (3.5%)	149.6 (4%)
Transportation	155 (4.1%)	163.7 (4.4%)	229.2 (6.1%)	261.9 (7%)
Vacant	0 (0%)	0 (0%)	14.9 (0.39%)	29.9 (0.81%)
Public	25 (0.7%)	46.7 (1.2%)	65.3 (1.7%)	74.7 (2%)
Mixed-Use (Residential/Commercial)	0 (0%)	0 (0%)	11.8 (0.31%)	25.5 (0.69%)
Total				



Comment [ER9]: Does M1 correspond to field screening point # 1? Table V references M1, M2, M3, M4, and M5 but there are only 4 field screening points proposed. Clarify by providing a table that relates outfall #, field screening point #, and drainage area #.

Comment [ER10]: Does M5 correspond to field screening point # 4? If so, clarify. See comment above.

*M4 drainage area covers very less drainage area of city therefore not added in table V

Comment [ER11]: Add total land use acreage for each of the 2 drainage areas listed on this table.

Table VI - Summary of Outfall and Field Screening Points

Outfall #	Coordinates	Outlet Location	Ownership	Size (in)	Outlet material	Picture
1	33.9090167, -118.32568	132 nd Street	LACFCD	42	Reinforced Channel Pipe (RCP)	
2	33.909458, -118.325608	W 135 th St.	LACFCD	168	Reinforced Cement Concrete (RCC)	
3	33.901283, -118.326691	Rosecrans Ave.	LACFCD	87	Reinforced Concrete Box (RCB)	
4	33.871158, -118.306413	Hollyhock Way (Gardena Drain)	LACFCD	48	Reinforced Channel Pipe (RCP)	

Comment [ER12]: Which outfall corresponds to which field screening point? Additionally, in Section 1.4, include a discussion on how each of the 2 proposed field screening points best represents the City's land use with reference to Tables III, IV, and V.

Comment [ER13]: Storm drain outfall catchment area (drainage area) maps for each major outfall within the City's jurisdiction are missing, but seem to be referenced in Section 1.2. The IMP needs to include storm drain outfall catchment areas for each major outfall. If these are not currently available, provide a schedule for delineating the catchment areas and submitting the delineations to the Regional Water Board.



5	33.8712527, - 118.882141	S Normandi e Ave.	LACFCD	117	Reinforced Concrete Box (RCB)	
Field Screening point No.	Field Screening Coordinates	Field Screening Location	Ownership	Size (in)	Field Screening material	Picture
1	33.9090147, - 118.32588	W-EI Segundo Blvd	LACFCD	36	Concrete Pipe	
2	33.909201, - 118.32121	135 th street	LACFCD	36	Concrete Box	
3	33.901836, - 118.324964	Rosecrans avenue	LACFCD	36	Concrete Box	
4	33.872029, - 118.298876	S Normandi e Ave.	LACFCD	36	Concrete Box	

1.5 Non-Storm Water Outfall-Based Monitoring

~~The City will not perform non-stormwater outfall monitoring to determine compliance with TMDLs, other water quality standards, and action levels. Such requirements exceed federal stormwater regulations. As already explained, MS4 permittees are required to control pollutants in stormwater discharges from the outfall through BMPs and other actions. For non-stormwater discharges no such requirement is mandated. MS4 permittees are required only to prohibit impermissible (i.e., non-exempt) non-stormwater discharges into the MS4. If a permittee does not succeed in getting the discharger to prohibit the non-stormwater discharge, it must require the discharger to obtain a separate discharge permit. This is an argument that was raised in the City's~~



~~administrative petition and is supported by federal statute and State Board water quality orders.~~

However, ~~t~~The City will perform visual outfall and sampling monitoring in connection with illicit connection and discharge elimination requirements in keeping with federal stormwater regulations and USEPA guidance. Non-stormwater discharge monitoring will conform to 122.26(d)(1)(D) for the purpose of screening for illicit connections and dumping, which specifies visual monitoring at outfalls for dry weather (non-stormwater discharges). Visual monitoring shall be performed twice a year during dry periods. If flow is observed samples for the outfall (or field screening points):

...samples shall be collected during a 24 hour period with a minimum period of four hours between samples. For all such samples, a narrative description of the color, odor, turbidity, the presence of an oil sheen or surface scum as well as any other relevant observations regarding the potential presence of non-storm water discharges or illegal dumping shall be provided.

In addition, regulations require a narrative description of the results from sampling for fecal coliform, fecal streptococcus, surfactants (MBAS), residual chlorine, fluorides and potassium; pH, total chlorine, total copper, total phenol, and detergents (or surfactants) shall be provided along with a description of the flow rate. These analytes will be used as potential indicators of illicit discharges, which would trigger an up-stream investigation to identify the source of the suspected illicit discharge or connection. If the source of the illicit discharge/connection and discharger is identified, the City shall notify the discharger that it will need to halt the discharge and, if not feasible, will require the discharger to obtain a discharge permit.

As per the LA County MS4 Permit, non-stormwater outfall based monitoring must be included in the IMP as outlined in Part IX of Attachment E.



The City's non-stormwater outfall based screening and monitoring process is outlined below:

- Field Screening – Outfalls greater than or equal to 36 inches or for ~~an~~ MS4 outfalls that discharge from a single pipe with an inside diameter of 12 inches or more or from its equivalent in diameter that receives storm water from lands zoned for industrial activity ~~and an outfall that discharges from a single pipe with an inside diameter of 12 inches or more or from its equivalent in diameter~~ will be located and mapped using GIS. Field screening events will take place during dry weather, i.e., on days with <0.1 inch of rain and no less than 72 hours after a rain event. An observation will be conducted during working hours. During observations staff will complete an **Outfall Screening Form** containing information such as date, time, weather, flow amount, visual turbidity, and trash odor. Photographs will also be taken during the inspection.
- Inventory of Screening Points: An inventory will be developed for major MS4 outfalls with known significant non-stormwater discharges and those requiring no further assessment. This inventory will be updated annually.
- No further Assessment: No further Assessment will be reported in the inventory database if no flow is observed. However, where changes are needed, the City will make the changes in its written program documents, implement these changes in practice, and describe the changes within the next annual report.
- Prioritization Criteria & Source Investigation: Based on data collected during the screening process, the City will identify screening points with significant non-stormwater discharges and those requiring no further action. The data collected as part of the outfall screening process will be used to prioritize outfalls for source investigation. The City will complete 25% of source

Comment [PR14]: As per Part IX.B.2 of Attachment E of the LA County MS4 Permit, the City must conduct at least one re-assessment of its non-stormwater outfall-based screening and monitoring program during the term of the LA County MS4 Permit. Add this commitment to the bulleted list, below.

Comment [ER15]: How many screening events will there be and what is the criteria to determine which outfalls have significant non-stormwater discharge?



identification inventory by December 28th, 2015 and 100% by December 28, 2017.

- Implement Source Identification: If necessary, the City will implement source identification in prioritized order, consistent with the City's IC/ID Program. The City's contribution will be quantified if the discharge is comprised of multiple sources. Upstream jurisdictions and the Regional Board will be notified if the source originates outside the City's jurisdictional area.
- Monitor Non-storm Water Discharge Exceedance Criteria: The City will monitor outfall screening points conveying significant discharges comprised of unknown or conditionally exempt non-stormwater discharges, or continuing illicit discharges. In addition, an outfall subject to an approved dry weather TMDL will be monitored per the TMDL Monitoring Plan. The City will monitor non-stormwater discharge four times per year. Monitoring frequency will be reduced to twice per year beginning the second year of monitoring if pollutant concentration during the first year do not exceed WQBELs, Non-stormwater Action Levels, or water quality standards for pollutants on the 303(d) list ~~or Non-stormwater Action Levels for the receiving water.~~ After 1 year of monitoring, the City may submit a written request to the Executive Officer of the Regional Water Board to reduce or eliminate monitoring of specified pollutants, based on an evaluation of the monitoring data. Outfall(s) will be monitored for the flow, constituents identified in Attachment N of MS4 permit, Table E-2 constituents that are found exceeding the lowest water quality objective in the downstream receiving water, and other pollutants identified in 303(d) list. Pollutants identified in a TIE conducted in response to observed aquatic toxicity during dry weather at the nearest downstream receiving water monitoring station or, where the TIE conducted on the receiving water sample was

Comment [ER16]: The IMP should be more specific on how a significant non-stormwater discharge will be determined. In particular, it should provide greater specificity on thresholds for field measurements, including flow and water quality data that will be used to determine whether a non-stormwater discharge is significant (i.e., flow greater a garden hose).



inconclusive that non-stormwater outfall monitoring will include aquatic toxicity monitoring. If the discharge exhibits aquatic toxicity, then a TIE shall be conducted.

1.6 ~~Municipal Action Levels~~

Comment [ER17]: Already covered in Section 1.11.

~~The purpose of municipal action levels (MALs) is not clear and appears to be superfluous given the permit's other monitoring requirements. All of the MAL constituents are already addressed by TMDLs and federally mandated monitoring for certain constituents¹. The MS4 Permit's fact sheet mentions that the purpose of MAL monitoring is to evaluate the effectiveness of a Permittee's stormwater management program in reducing pollutant loads from drainage areas as a means of determining compliance with the maximum extent practical (MEP) standard. There is no guidance in the permit to explain how this task is to be accomplished. MAL monitoring is also intended to evaluate the effectiveness of post-construction BMPs. It is not clear, however, how MALs can evaluate post-construction BMPs. One basic question is where would MAL monitoring be performed, a development or new development site or down stream from it, for which post-construction BMPs have been prescribed?~~

~~The City has challenged the MAL monitoring requirement in its administrative petition, based on these and other concerns. MAL monitoring represents an unnecessary cost that accomplishes nothing beneficial. Nevertheless, because MAL constituents are included in other stormwater monitoring requirements, the City will effectively be meeting this monitoring requirement. The permit's monitoring program also requires non-stormwater Action Levels (NSAL) applies to non-stormwater discharges for compliance.~~

¹Total nitrogen, total phosphorous, Ammonia-N, TKN, Total PCBs, Chlordane, Dieldrin, 1,1- DDD, 1,1- DDE, 1,1- DDT, Cadmium, Chromium, copper, lead, zinc, E-Coli, fecal coliform.



As mentioned, the City has challenged all non-stormwater monitoring tasks that are intended to determine compliance with TMDLs and other water quality standards.

1.7 New Development/Redevelopment Tracking

The Planning and Land Development Program (PLDP) requires tracking new development and redevelopment projects within 60 days after the permit's adoption (~~unless a permittee chooses to participate in watershed management program by February 26, 2013~~). Although not a monitoring requirement per se, permittees are nevertheless required to maintain a database containing the following information:

- name of the project and developer,
- project location and map (preferably linked to the GIS storm drain map),
- date of Certificate of Occupancy,
- 85th percentile storm event for the project design (inches per 24 hours),
- 95th percentile storm event for projects draining to natural water bodies (inches per 24 hours), related to hydromodification
- other design criteria required to meet hydromodification requirements for drainages to natural water bodies,
- project design storm (inches per 24-hours),
- project design storm volume (gallons or MGD),
- percent of design storm volume to be retained on site
- design volume for water quality mitigation treatment BMPs, if any.
- If flow through, water quality treatment BMPs are approved, provide the one year, one-hour storm intensity as depicted on the most recently issued isohyetal map published by the Los Angeles County Hydrologist,
- percent of design storm volume to be infiltrated at an off-site mitigation or groundwater replenishment project site
- percent of design storm volume to be retained or treated with bio-filtration at an off-site retrofit project,
- location and maps (preferably linked to the GIS storm drain map required in Part VII.A of this MRP) of off-site mitigation, groundwater replenishment, or retrofit sites documentation of issuance of requirements to the developer.



The City intends to meet this requirement through a revised SUSMP evaluation form (see **Section Two, SUSMP Appendix B-4**).

Comment [PR18]: Submit this form for Board review.

1.8 Regional/Special Studies

The Southern California Stormwater Monitoring Coalition (SMC) Regional Watershed Monitoring Program was initiated in 2008. This program is conducted in collaboration with the Southern California Coastal Water Research Project (SCCWRP), State Water Board's Surface Water Ambient Monitoring Program, three Southern California Regional Water Quality Control Boards (Los Angeles, Santa Ana, and San Diego) and several county storm water agencies (Los Angeles, Ventura, Orange, Riverside, San Bernardino and San Diego). SCCWRP acts as the facilitator to organize the program and completes data analysis and report preparation. The SMC monitoring program seeks to coordinate and leverage existing monitoring efforts to produce regional estimates of condition, improve data comparability and quality assurance, and maximize data availability, while conserving monitoring expenditures. The primary goal of this program is to implement an ongoing, large - scale regional monitoring program for southern California's coastal streams and rivers. The monitoring program addresses three main questions:

- What is the condition of streams in southern California?
- What are the stressors that affect stream condition?; and
- Are conditions getting better or worse?

In order to continue the implementation efforts of the SMC monitoring program, the City will support or provide monitoring data as described at the SMC sites within the watershed management area(s) that overlap with the City's jurisdictional area.

1.9 Toxicity Monitoring

Comment [PR19]: Align this section with the clarification memo on toxicity monitoring issued in August 2015 (attached).



The MRP of the MS4 permit requires toxicity testing at the outfall and in the receiving water. The City will collect and analyze grab samples taken from receiving water monitoring locations to evaluate the extent and cause of toxicity in the receiving water. Receiving water monitoring station (Dominguez Channel and Vermont Ave.) will be used to test for aquatic toxicity. If toxicity is present in the receiving water, the City will perform toxicity testing on water samples taken from field screening points to make sure that the toxicity is coming from City's jurisdictional area. A sufficient number of samples specified in the MRP shall be collected to perform both the required toxicity test and TIE studies.

1.9.1 Sensitive Species Selection

The MRP states that a sensitivity screening is required to select the most sensitive test species unless "a sensitive test species has already been determined, or if there is prior knowledge of potential toxicant(s) and a test species is sensitive to such toxicant(s), then monitoring shall be conducted using only that test species." Previous relevant studies conducted in the watershed should be considered. Such studies may have been completed via previous MS4 sampling, wastewater NPDES sampling, or special studies conducted within the watershed. The following sub-sections discuss the species selection process for assessing aquatic toxicity in receiving waters.

1.9.2 Freshwater Sensitive Species Selection

As described in the MRP, samples collected in receiving waters with salinity less than or equal to 1 ppt or from outfalls discharging to receiving waters with salinity less than or equal to 1 ppt, the Marine and Estuarine Test Species and Methods would be used. Toxicity tests should be conducted on the most sensitive test species in accordance with species and short-term test



methods in *Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms*. The freshwater test species identified in the MRP are:

- A static renewal toxicity test with the fathead minnow, *Pimephales promelas* (Larval Survival and Growth Test Method 1000.04).
- A static renewal toxicity test with the daphnid, *Ceriodaphnia dubia* (Survival and Reproduction Test Method 1002.05).
- A static non-renewal toxicity test with the green alga, *Selenastrum capricornutum* (also named *Raphidocelis subcapitata*) (Growth Test Method 1003.0).

The three test species were evaluated to determine if either a sensitive test species had already been determined, or if there is prior knowledge of potential toxicant(s) and a test species is sensitive to such toxicant(s). In reviewing the available data in the Dominguez Channel watershed, metals, historical organics, and pyrethroids have been identified as problematic and are generally considered the primary aquatic life toxicants of concern found in urban runoff. Given the knowledge of the presence of these potential toxicants in the watershed, the sensitivities of each of the three species were considered to evaluate which is the most sensitive to the potential toxicants in the watersheds.

As *C. dubia* is identified as the most sensitive to known potential toxicant(s) typically found in receiving waters and urban runoff in the freshwater portions of the watershed, *C. dubia* is selected as the most sensitive species. The species also has the advantage of being easily maintained by means of in-house mass cultures. The simplicity of the test, the ease of interpreting results, and the smaller volume necessary to run the test, make the test a valuable screening tool. The ease of sample collection and



higher sensitivity will support assessing the presence of ambient receiving water toxicity or long term effects of toxic storm water over time.

As such, toxicity testing in the freshwater portions of the watershed will be conducted using *C. dubia*. However, *C. dubia* test organisms are typically cultured in moderately hard waters and can have increased sensitivity to elevated water hardness greater than 400 mg/L CaCO₃, which is beyond their typical habitat range. Because of this, in instances where hardness in site waters exceeds 400 mg/L (CaCO₃), an alternative test species may be used. *Daphnia magna* is more tolerant to high hardness levels and is a suitable substitution for *C. dubia* in these instances.

1.9.3 Toxicity Identification Evaluation (TIE)

A toxicity test sample is immediately subject to TIE procedures to identify the toxic chemical(s), if either the survival or sub-lethal endpoint demonstrates a Percent Effect value equal to or greater than 50% at the Instream Waste Concentration (IWC). Percent Effect is defined as the effect value denoted as the difference between the mean control response and the mean IWC response, divided by the mean control response - multiplied by 100. A TIE shall be performed to identify the causes of toxicity using the same species and test method and, as guidance, U.S. EPA manuals: Toxicity Identification Evaluation: Characterization of Chronically Toxic Effluents, Phase I (EPA/600/6 - 91/005F, 1992); Methods for Aquatic Toxicity Identification *Evaluations, Phase II* Toxicity Identification Procedures for Samples Exhibiting Acute and Chronic Toxicity (EPA/600/R - 92/081, 1993); Methods for Aquatic Toxicity Identification *Evaluations, Phase III* Toxicity Confirmation Procedures for Samples Exhibiting Acute and Chronic Toxicity (EPA/600/R - 92/081, 1993) and Marine Toxicity Identification Evaluation (TIE): Phase I Guidance Document (EPA/600/R - 96 - 054, 1996).



The TIE should be conducted on the test species demonstrating the most sensitive toxicity response at a sampling station. A TIE may be conducted on a different test species demonstrating a toxicity response with the caveat that once the toxicant(s) are identified, the most sensitive test species triggering the TIE shall be further tested to verify that the toxicant has been identified and addressed. A TIE Prioritization Metric (see Appendix 5 in SMC Model Monitoring Program) may be utilized to rank sites for TIEs.

1.9.4 Toxicity Reduction Evaluation (TRE)

If a toxicant or class of toxicants could not be conclusively identified through a TIE conducted on the receiving water sample, the City will conduct toxicity testing at the outfall at the next sampling event during the same condition (i.e., either wet weather or dry weather) in which the toxicity was observed in the receiving water. When a toxicant or class of toxicants is identified through a TIE conducted at a receiving water monitoring station, the City shall analyze for the toxicant(s) during the next scheduled sampling event in the discharge from the outfall(s) upstream of the receiving water location. If the toxicant is present in the discharge from the outfall at levels above the applicable receiving water limitation, a TRE shall be performed for that toxicant. The TRE shall include all reasonable steps to identify the source(s) of toxicity and discuss appropriate BMPs are identified; the City Permittee(s) shall submit a TRE Corrective Action Plan to the Regional Water Board Executive Officer for approval. At a minimum, the plan shall include a discussion of the following:

- The potential sources of pollutant(s) causing toxicity.
- A list of municipalities and agencies that may have jurisdiction over sources of pollutant(s) causing toxicity.
- Recommended BMPs to reduce the pollutants(s) causing toxicity.
- Proposed post - construction control measures to reduce the pollutant(s) causing toxicity.



- Follow - up monitoring to demonstrate that the toxicants have been reduced or eliminated.

1.10 Chemical TMDL Monitoring and Compliance Schedule

Chemical TMDL sampling will be performed at field screening points from stormwater discharges at least three times a year. Sampling and analysis will be in keeping with USEPA guidance. The table below specifies interim and final TMDL WLAs and compliance deadline dates to which the City is subject. Table VII below is a summarize list of constituents for MS4 and TMDL storm water outfall, receiving water, and non-stormwater outfall based monitoring. In addition, non-stormwater outfall based, receiving water and stormwater outfall-based monitoring will include testing for 303(d) listed pollutants that are not addressed by TMDLs.

Table VII – List of Constituents

Upper Dominguez Channel (Upper HUC 12)	Lower Dominguez Channel (Lower HUC 12)
Flow, hardness, pH, dissolved oxygen, temperature, specific conductivity, TSS & SSC	Flow, hardness, pH, dissolved oxygen, temperature, specific conductivity, TSS & SSC
Table E-2 Pollutants	Table E-2 Pollutants
Copper, Lead, Zinc	Copper, Lead, Zinc
Toxicity - Chlordane, DDT, PCBs, & PAHs	Toxicity - Chlordane, DDT, PCBs, & PAHs
Suspended Sediment: Copper, Lead, Silver, Zinc, Chlordane, DDT, PCBs & PAHs	Suspended Sediment: Copper, Lead, Silver, Zinc, <u>Cadmium</u> , Chlordane, DDT, PCBs & PAHs
TIE	TIE
303(d) List – Ammonia, Copper, Indicator bacteria, Lead, Toxicity, Zinc, Diazinon	303(d) List – Ammonia, BMB, Benzo Pyrene, benzo Anthracene, Chlordane (tissue), Chrysene(C1-C4), Coliform Bacteria, DDT(tissue & sediment), Dieldrin(tissue), Lead(tissue), PCBs, Phenanthrene, Pyrene, Zinc(sediment), Sediment toxicity

Table VIII – Dominguez Channel Freshwater TMDL

Toxics TMDL	Wet Weather Interim WLA	Deadline	Wet Weather Final WLA	Deadline
• Total Copper	207.51 µg/L	December 28, 2012	1300.3 g/day	March 23, 2032
• Total Lead	122.88 µg/L	December 28,	5733.7 g/day	March 23,



		2012		2032
• Total Zinc	898.87 µg/L	December 28, 2012	9355.5 g/day	March 23, 2032
• Toxicity	2 TUc	December 28, 2012	1 TUc	March 23, 2032

Table IX – Dominguez Channel Estuary TMDL

Pollutant	Interim Sediment	Compliance Schedule	Final Sediment	Compliance Schedule
• Copper	220 mg/kg	December 28, 2012	22.4 kg/year	March 23, 2032
• Lead	510 mg/kg	December 28, 2012	54.2 kg/year	March 23, 2032
• Zinc	789 mg/kg	December 28, 2012	271.8 kg/year	March 23, 2032
• DDT	1.727 mg/kg	December 28, 2012	<u>0.25 g/year</u>	March 23, 2032
• PAHs	31.60 mg/kg	December 28, 2012	0.134 kg/year	March 23, 2032
• PCBs	1.490 mg/kg	December 28, 2012	<u>0.207 g/year</u>	March 23, 2032
• Cadmium	--	--	1.2 mg/kg	March 23, 2032
• Chromium	--	--	81 mg/kg	March 23, 2032
• Mercury	--	--	0.15 mg/kg	March 23, 2032

The City will additionally monitor fish tissue and sediment samples from Dominguez Channel Estuary as required by the TMDL.

Comment [PR20]: Include detail on TMDL monitoring requirements for water, sediment, and fish tissue monitoring as set forth in the Board's August 10, 2015 comment letter, Enclosure 1, pgs. 7-9.

1.11 MAL Monitoring

Stormwater sampling against MAL analytes shall be performed at the same time stormwater monitoring is performed for other purposes and with the same frequency – three times during ~~the wet~~ season weather. The table below identifies the MAL analytes and their numeric limitations.

Table X - Municipal Action Levels

Metals	Unit	Total
Cadmium	ug/l	2.52
Chromium	ug/l	20.2
Copper	ug/l	71.12
Lead	ug/l	102



Zinc	ug/l	641.3
Nickel	ug/l	27.43
Mercury	ug/l	0.32
Conventional Pollutants	Unit	MAL
Total Phosphorus	mg/l	0.80
Nitrate & Nitrite	mg/l	1.85
Kjedahl Nitrogen (TKN)	mg/l	4.59
COD	mg/l	247.5
TSS	mg/l	264.1
pH	-	6 -9

1.12 Action Level Monitoring

The tables below lists non-stormwater action level analytes for the Dominguez Channel. ~~As mentioned, the City shall not conduct outfall monitoring for compliance purposes. Such monitoring is not authorized under the Clean Water Act and is contrary to State Board water quality orders. Because non-stormwater discharges are not subject to an iterative process, an exceedance would place a permittee in violation. Nevertheless, t~~The City permittee shall conduct non-stormwater monitoring for non-stormwater action levels to detect and eliminate illicit discharges and connections (see below Section 1.14).

Table XI – Action Levels (Non-Stormwater) for Dominguez Channel (with receiving water salinity equal to or less than 1 ppt)

Analyte	Units	Average Monthly	Daily Maximum
pH	Standard units	6.5-8.5 ²	
<i>E. coli</i> Bacteria	#/100 ml	126 ³	235 ⁴
Cyanide, Total Recoverable	µg/l	4.3	8.5
Copper, Total Recoverable	µg/l	7	14
Lead, Total Recoverable	µg/l	2.6	5.2
Mercury, Total Recoverable	µg/l	0.051	0.10
Selenium, Total Recoverable	µg/l	4.1	8.2

¹Within the range of 6.5 to 8.5 at all times

²E.coli density shall not exceed a geometric mean of 126/200 ml

³E.coli density in a single sample shall not exceed shall not exceed 235/100 ml

⁴In accordance with applicable water quality objectives contained in Chapter 3 of the Basin Plan

⁵Same as Chloride (see footnote 13)



Table XII – Action Levels (Non-Stormwater) for Dominguez Channel Estuary (with receiving water salinity equal to or greater than 10 ppt 95% or more of the time^{35-ppt})

Analyte	Units	Average Monthly	Daily Maximum
pH	Standard units	6.5-8.5 ¹	
Total Coliform bacteria	#/100 ml	1000 ^{2,3}	10,000 ^{3,4}
Fecal Coliform Bacteria	#/100 ml	200 ²	400 ⁴
Enterococcus Bacteria	#/100 ml	35 ²	104 ⁴
Cyanide, Total Recoverable	ug/L	0.5	1
Copper, Total Recoverable	ug/L	2.9	5.8
Lead, Total Recoverable	ug/L	7	14
Mercury, Total Recoverable	ug/L	0.051	0.1
Selenium, Total Recoverable	ug/L	58	117

¹ Within the range of 6.5 to 8.5 at all times.

² Total coliform density shall not exceed a geometric mean of 1,000/100 ml. Fecal coliform density shall not exceed a geometric mean of 200/100 ml. Enterococcus density shall not exceed a geometric mean of 35/100 ml.

³ In areas where shellfish may be harvested for human consumption, as determined by the Regional Water Board, the median total coliform density shall not exceed 70/100 ml and not more than 10 percent of the samples shall exceed 230/100 ml.

⁴ Total coliform density in a single sample shall not exceed 10,000/100 ml. Fecal coliform density in a single sample shall not exceed 400/100 ml. Enterococcus density shall not exceed a geometric mean of 104/100 ml.

1.13 Additional Monitoring Required for IMP Compliance

MRP section VI.C.2.a.i and ii requires additional outfall monitoring tasks for permittees ~~that are subject to the SWMP~~. They include pollutants that are currently not TMDLs but are nevertheless 303(d) listed (e.g., cyanide). ~~Regional Board staff has suggested that other water quality standards be included that can be found in the previous MS4 in attachment U of the Monitoring Program.~~

The purpose of this monitoring task is to identify non-TMDL pollutants that are causing impairments to beneficial uses of receiving waters and to evaluate the effectiveness of BMPs implemented through the SWMPA/WMP. They are also included to determine if non-TMDL pollutants are causing or contributing to exceedances of receiving water limitations. ~~The City takes the position that the detection of an exceedance does not constitute a violation. Any persistent exceedance of a TMDL or water quality standard monitored over the term of the permit would not constitute a violation provided that (1) the~~



SWMP/WMP is being implemented in a timely and complete manner; and (2) complies with the iterative process described in MS4 permit section V.A.1-4.

Resulting data generated from SWMP-related monitoring will be, along with TMDL monitoring, loaded into the water quality model. These pollutants will be added to the stormwater outfall sampling list. Monitoring for all the constituents that will be tested will be conducted according to test procedures approved under 40 CFR Part 136 for the analysis of the pollutants. Suspended Sediment Concentration (SSC) shall be analyzed per American Society for Testing and Materials (ASTM) Standard Test Method D-3977-97.

Table XIII - Monitoring for Non-TMDL Water Quality Standards

CONSTITUENTS	USEPA METHOD	MLs
CONVENTIONAL POLLUTANTS		
		mg/L
Oil and Grease	EPA 1664	5
Total Phenols	EPA 420.1	0.1
Cyanide	EPA 4500-CNC	0.005
pH	EPA 150.1	0 – 14
Temperature	NA	None
Dissolved Oxygen	NA	Sensitivity to 5 mg/L
BACTERIA (single sample limits)		
		MPN/100ml
Total Coliform (marine waters)	SM 9221B	10,000
Fecal Coliform (marine & fresh waters)	SM 9222 B	400
Enterococcus (marine waters)	SM 9230 B	104
E-Coli	SM 9230 B	235
GENERAL		
		mg/L
Dissolved Phosphorus	SM 4500-PC	0.05
Total Phosphorus	SM 4500-PC	0.05
Turbidity	EPA 180.1	0.1NTU
Total Suspended Solids	EPA 160.2	2
Total Dissolved Solids	EPA 160.1	2
Volatile Suspended Solids	EPA 160.4	2
Total Organic Carbon	SM 5310 B	1
Total Petroleum Hydrocarbon	EPA 1664	5
Biochemical Oxygen Demand	SMOL-5210	2
Chemical Oxygen Demand	SM 5220D	20-900
Total Ammonia-Nitrogen	EPA 350.2	0.1
Total Kjeldahl Nitrogen	EPA 351.2	0.1
Nitrate-Nitrite	EPA 4110	0.1
Alkalinity	EPA 310.1	2
Specific Conductance	EPA 120.1	1umho/cm



Total Hardness	EPA 130.2	2
MBAS	SM 5540 C	0.5
Chloride	EPA 300	2
Fluoride	EPA 300	0.1
Methyl tertiary butyl ether (MTBE)	EPA 4110	1
Perchlorate	EPA 314.0	4 ug/l
METALS (Dissolved & Total)		µg/L
Aluminum	EPA 200.8	100
Antimony	EPA 200.8	0.5
Arsenic	EPA 200.8	1
Beryllium	EPA 200.8	0.5
Cadmium	EPA 200.8	0.25
Chromium (total)	EPA 200.8	0.5
Chromium (Hexavalent)	EPA 200.8	5
Copper	EPA 200.8	0.5
Iron	EPA 200.8	100
Lead	EPA 200.8	0.5
Mercury	EPA 1631E	0.5
Nickel	EPA 200.8	1
Selenium	EPA 200.8	1
Silver	EPA 200.8	0.25
Thallium	EPA 200.8	1
zinc	EPA 200.8	1
SEMIVOLATILE ORGANIC COMPOUNDS		
ACIDS		µg/L
2-Chlorophenol	EPA 625	2
4-Chloro-3-methylphenol	EPA 625	1
2,4-Dichlorophenol	EPA 625	1
2,4-Dimethylphenol	EPA 625	2
2,4-Dinitrophenol	EPA 625	5
2-Nitrophenol	EPA 625	10
4-Nitrophenol	EPA 625	5
Pentachlorophenol	EPA 625	2
Phenol	EPA 625	1
2,4,6-Trichlorophenol	EPA 625	10
BASE/NEUTRAL		µg/L
Acenaphthene	EPA 625	1
Acenaphthylene	EPA 625	2
Anthracene	EPA 625	2
Benzedine	EPA 625	5
1,2 Benzantracene	EPA 625	5
Benzo(a)pyrene	EPA 625	2
Benzo(g,h,i)perylene	EPA 625	5
3,4 Benzoflouranthene	EPA 625	10
Benzo(k)flouranthene	EPA 625	2
Bis(2-Chloroethoxy) methane	EPA 625	5
Bis(2-Chloroisopropyl) ether	EPA 625	2
Bis(2-Chloroethyl) ether	EPA 625	1



Bis(2-Ethylhexyl) phthalate	EPA 625	5
4-Bromophenyl Phenyl ether	EPA 625	5
Butyl benzyl phthalate	EPA 625	10
2-Chloroethyl vinyl ether	EPA 625	1
2-Chloronaphthalene	EPA 625	10
4-Chlorophenyl phenyl ether	EPA 625	5
Chrysene	EPA 625	5
Dibenzo(a,h)anthracene	EPA 625	0.1
1,3-Dichlorobenzene	EPA 625	1
1,4-Dichlorobenzene	EPA 625	1
1,2-Dichlorobenzene	EPA 625	1
3,3-Dichlorobenzidine	EPA 625	5
Diethyl phthalate	EPA 625	2
Dimethyl phthalate	EPA 625	2
di-n-Butyl phthalate	EPA 625	10
2,4-Dinitrotoluene	EPA 625	5
2,6-Dinitrotoluene	EPA 625	5
4,6 Dinitro-2-methylphenol	EPA 625	5
1,2-Diphenylhydrazine	EPA 625	1
di-n-Octyl phthalate	EPA 625	10
Fluoranthene	EPA 625	0.05
Fluorene	EPA 625	0.1
Hexachlorobenzene	EPA 625	1
Hexachlorobutadiene	EPA 625	1
Hexachloro-cyclopentadiene	EPA 625	5
Hexachloroethane	EPA 625	1
Indeno(1,2,3-cd)pyrene	EPA 625	0.05
Isophorone	EPA 625	1
Naphthalene	EPA 625	0.2
Nitrobenzene	EPA 625	1
N-Nitroso-dimethyl amine	EPA 625	5
N-Nitroso-diphenyl amine	EPA 625	1
N-Nitroso-di-n-propyl amine	EPA 625	5
Phenanthrene	EPA 625	0.05
Pyrene	EPA 625	0.05
1,2,4-Trichlorobenzene	EPA 625	1
CHLORINATED PESTICIDES		µg/L
Aldrin	EPA 608	0.005
alpha-BHC	EPA 608	0.01
beta-BHC	EPA 608	0.005
delta-BHC	EPA 608	0.005
gamma-BHC (lindane)	EPA 608	0.02
alpha-chlordane	EPA 8270	0.1
gamma-chlordane	EPA 8270	0.1
4,4'-DDD	EPA 8270	0.05
4,4'-DDE	EPA 8270	0.05
4,4'-DDT	EPA 8270	0.01
Dieldrin	EPA 608	0.01



alpha-Endosulfan	EPA 608	0.02
beta-Endosulfan	EPA 608	0.01
Endosulfan sulfate	EPA 608	0.05
Endrin	EPA 608	0.01
Endrin aldehyde	EPA 608	0.01
Heptachlor	EPA 608	0.01
Heptachlor epoxide	EPA 608	0.01
Toxaphene	EPA 608	0.5
POLYCHLORINATED BIPHENYLS		µg/L
Aroclor-1016	EPA 8270	0.5
Aroclor-1221	EPA 8270	0.5
Aroclor-1232	EPA 8270	0.5
Aroclor-1242	EPA 8270	0.5
Aroclor-1248	EPA 8270	0.5
Aroclor-1254	EPA 8270	0.5
Aroclor-1260	EPA 8270	0.5
ORGANOPHOSPHATE PESTICIDES		µg/L
Atrazine	EPA 8141A/B	2
Chlorpyrifos	EPA 8141A/B	0.05
Cyanazine	EPA 8141A/B	2
Diazinon	EPA 8141A/B	0.01
Malathion	EPA 8141A/B	1
Prometryn	EPA 8141A/B	2
Simazine	EPA 8141A/B	2
HERBICIDES		µg/L
2,4-D	EPA 8151A	10
Glyphosate	EPA 8151A	5
2,4,5-TP-SILVEX	EPA 8151A	0.5
SOLIDS		mg/L
Total Suspended Solids (TSS)	SM 2540D	2
Suspended Sediment Concentration (SSC)	ASTM D3977-97C	NA
Volatile Suspended Solids	EPA 1684	2

Comment [ER21]: Monitoring for PCBs in sediment or water should be reported as the summation of aroclors and, separately, the summation of 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/pr ograms/swamp/docs/qapp/qappr082209.pdf for guidance. For specificity on how data for aroclors will be reported, add a footnote here and specify which and how many congeners will be used.

1.14 Non-stormwater Monitoring for ICID

As mentioned above, the City proposes to perform non-stormwater monitoring to detect and eliminate illicit connections and discharges in accordance with 40 CFR 122.26(d)(1)(D). Monitoring will consist of dry weather visual observations at outfalls or field screening points that shall be conducted monthly during the dry season (May 1 to September 30)-see **Appendix A-1** for field screening locations. If flow is detected, grab samples are to be taken within a 24 hour period and measured against fecal coliform,



fecal streptococcus, surfactants (MBAS), residual chlorine, fluorides, and potassium. Other constituents may be added later based on USEPA's ICID-DE guidance manual.

Comment [PR22]: Align this section with Section 1.5, or clarify the distinction between the two sections.

1.15 Reporting Requirements

The City shall comply with all reporting requirements specified in the MRP/IMP. The City expects to conduct monitoring effective October 1, 2015 and monitoring to be reported in the Annual Report due to the Regional Board on or before December 15, 2016.

1.16 Monitoring Protocols

The MRP requires a variety of monitoring requirements that are governed by monitoring protocols established by USEPA, which are summarized below.

I. Receiving Monitoring Protocol

Minimum required receiving water monitoring frequencies are defined in section VI.C of Attachment E in the MS4 Permit. Wet weather is defined as when the flow with the receiving water is at least 20% greater than the base flow. In an effort to simplify the wet weather definition, the City will utilize the definition in Attachment A of the MS4 Permit, which defines the wet season as the time period between October 1st and April 15th unless a storm event that is qualified to be targeted as the first event of the year is forecasted within a reasonable amount of time prior to October 1st. The City will ~~conduct~~ comply with Ambient Monitoring which will occur during wet ~~weather~~ season after 48 to 72 hours of storm period. ~~Ambient m~~Monitoring will occur at least three times per year ~~during of the wet~~ season for all applicable parameters with the exception for aquatic toxicity, which will be monitored twice per year



~~during wet weather.~~ The first ~~ambient~~ monitoring event will occur ~~during~~ after 48 to 72 hours of a predicted rainfall of .25 inches with a 70% probability of rain fall ~~will be targeted for monitoring.~~ At a minimum, two additional ~~ambient~~ events within the same wet weather season with a minimum separation of three dry days between monitoring will be monitored to meet the minimum requirement of three storm events per year.

TMDL ~~WLA~~ WQBELs, 303(d) List parameters s will be sampled during monitoring events. Parameters in Table E-2 (Table – XIII) of the LA County MS4 Permit will be monitored in the first year of monitoring during the first ~~ambient monitoring~~ significant rain event of the storm year.

Dry weather monitoring requirements are defined in section VI.D of Attachment E in the MS4 Permit. Dry weather is defined as when the flow is less than 20% than the base flow. Monitoring shall take place a minimum of two times per year for all parameters, or more if required by a TMDL monitoring plan. Parameters in Table E-2 (Table – XIII) of the LA County MS4 Permit will be monitored in the first year during the critical dry weather event. At least one of the monitoring events shall take place during the historically driest month of the year. Based on precipitation data and graph, July is the driest month of the year. This data can be seen in Appendix C.

II. *Non-storm water outfall based sampling Protocol*

Non-storm water outfall based samples will be collected on days when precipitations is <0.1 inch and those days not less than 3 days after a rain day. Flow-weighted composite samples shall be taken for a non-stormwater discharge using a continuous sampler or it shall be taken as a combination of a minimum of 3 sample aliquots, taken in each hour during a 24-hour period. Grab samples will be taken for constituents that are required to be collected by grab sampling. If the City cannot install an automated sampler then an alternate protocol (grab sampling) ~~is~~ will be proposed with justification and



submitted ultimately for approved approval by the Regional Board. Non-stormwater outfall monitoring of significant non-stormwater discharges that cannot be eliminated will occur 4 times during the year following source identification, or at the frequency identified in a TMDL Monitoring Plan if an outfall is subject to dry weather TMDLs. ~~Flow will be estimated for storm water outfall monitoring sites based on drainage area, impervious cover, and precipitation data.~~ Sample collection for non-stormwater outfall monitoring will occur concurrently with receiving water dry weather monitoring.

Comment [PR23]: This appears to relate to stormwater outfall monitoring, not non-stormwater outfall monitoring and, therefore, should be moved to the section below.

III. *Outfall Based sampling protocol*

For each field screening point, samples shall be collected of storm water discharge from three storm events, within the same wet weather season, occurring at least one month apart in accordance with the requirements indicated below:

- ~~Flow will be estimated for storm water outfall monitoring sites based on drainage area, impervious cover, and precipitation data.~~
- For storm water discharges, all samples shall be collected from the discharge resulting flow with the receiving water is at least 20% greater than the base flow. For Dominguez Channel, wet weather is defined as any day when the maximum daily flow measured at a location within the Dominguez Channel is equal to or greater than 62.7 cfs, a flow-weighted composite shall be taken each hour of discharge for the first 24 hours of the discharge or for the entire discharge if the storm event is less than 24 hours. The flow-weighted composite sample for a storm water discharge may be taken with a continuous sampler or as a combination of a minimum of three sample aliquots taken in each hour of discharge for the first 24 hours of the

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discharge or for the entire discharge if the storm event is less than 24 hours, with each aliquot being separated by a minimum period of twenty minutes. In addition, the City will target the first storm event of the storm year with a predicted rainfall of at least 0.25 inch at a 70% probability of rainfall at least 24 hours prior to the event start time. Another two wet weather monitoring sampling event will happen when the predicted rain is equal to or more than 0.1 inches and minimum 3 consecutive days of dry weather.

- List of constituents described in Table VII will be monitored from outfall. For stormwater outfall monitoring, other parameters in Table E-2 identified as exceeding the lowest applicable water quality objective in the nearest downstream receiving water monitoring station will be monitored.
- Sample collection of stormwater outfall monitoring shall occur concurrently with receiving water wet weather monitoring.

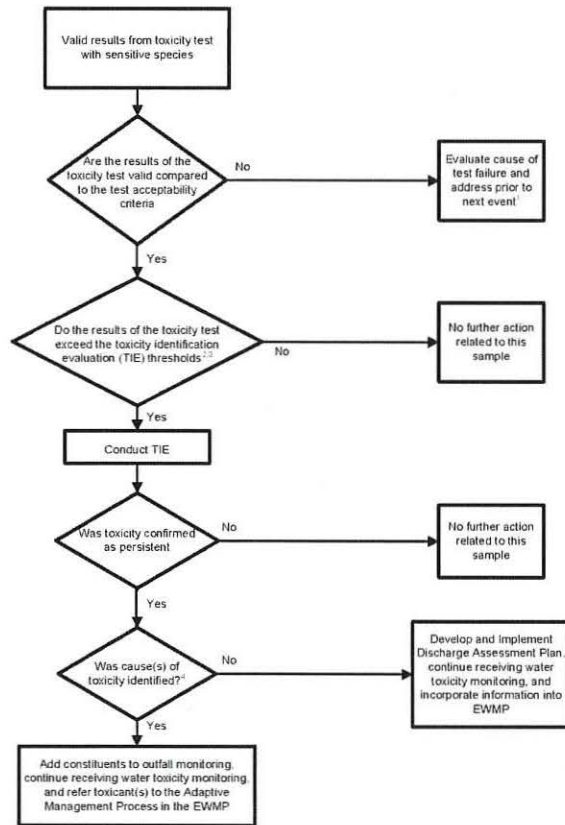
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IV. Toxicity Monitoring/Testing Protocol

The approach to conducting aquatic toxicity monitoring is presented in Figure C-1, which describes a general evaluation process for each sample collected as part of routine sampling conducted twice per year in wet weather and once per year in dry weather. Monitoring begins in the receiving water and the information gained is used to identify constituents for monitoring at outfalls to support the identification of pollutants.



Comment [ER24]: Refer to the Toxicity Memo dated August 7, 2015 that was sent to the City.



Footnotes

1. Test failure includes pathogen or epibiont interference, which should be addressed prior to the next toxicity sampling event. Additionally, lab control organisms may fail to meet test standards. As a result of test failure, toxicity samples will be collected during the next wet weather event, or as soon as possible following notification of test failure for dry event samples.
2. For freshwater, the TIE threshold is equal to or greater than 50% (≥50%) mortality in an acute (wet weather) or chronic (dry weather) test. If a ≥50% effect in a sub-lethal endpoint for chronic test is observed during dry weather, a follow up sample will be collected within two weeks of the completion of the initial sample collection. If the follow up sample exhibits a ≥50% effect, a TIE will be initiated.
3. For marine waters and estuarine waters, the TIE threshold is the percent effect value ≥50%. If a ≥50% or greater effect is observed during dry weather a follow up sample will be collected within two weeks of the initial sample collection and if the follow up sample exhibits a ≥50% effect, a TIE will be initiated.
4. The goal of conducting Phase I TIEs is to identify the cause of toxicity so that outfall monitoring can incorporate the toxicant(s) into the list of constituents monitored during outfall monitoring. Thus, if specific toxicant(s) or the analytical class of toxicants (i.e., metals that are analyzed via EPA Method 200.8) are identified, sufficient information is available to inform the addition of pollutants to the list of pollutants monitored during outfall monitoring.



1.17 Implementation Schedule (Milestones)

The table below provides a schedule for implementing MRP/IMP tasks.

Table XIV – Implementation Schedule

Task	Deadline Date
<ul style="list-style-type: none"> Using GIS mapping, provide land use overlay of City's storm drain system 	No later than June 28, 2014
<ul style="list-style-type: none"> Using GIS mapping, show City's storm drain system including catch basins and connections to receiving waters 	No later than June 28, 2014
<ul style="list-style-type: none"> Using GIS mapping, identify watershed and sub-watershed based on Los Angeles County's HUC 12 equivalent boundaries 	No later than June 28, 2014
<ul style="list-style-type: none"> Using GIS mapping, identify: stormwater outfalls and field screening points; mass emission and other in-stream monitoring points/stations; and ambient monitoring locations established by the Regional Board's Surface Water Ambient Monitoring Program (SWAMP); and locations established by the Council for Watershed Health. 	No later than June 28, 2014
<ul style="list-style-type: none"> Conduct outfall monitoring for stormwater discharges for TMDLs<u>TMDL</u> WQBELs, other water quality standards, MALs, and toxicity during three times-storm events beginning during 2015-2016 wet seasons and three times per year in every year annually thereafter. 	Beginning no later than October 4, 2015
<ul style="list-style-type: none"> During the dry season, conduct monthly non-stormwater visual observations and grab sampling if flow is detected. 	No later than May 1, 2016
<ul style="list-style-type: none"> Conduct receiving water<u>ambient</u> monitoring 	No later than October 1, 2015
<ul style="list-style-type: none"> Submit annual monitoring reports to the Regional Board of any available TMDL or other water quality standards data generated through outfall and receiving water monitoring, including required TMDL monitoring in Dominguez Channel and Dominguez Channel Estuary. 	Beginning no later than December of 2015
<ul style="list-style-type: none"> Submit new development/redevelopment tracking form. 	No later than one month following the Regional Board's approval of the IMP

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End Section One



Appendix A

Maps

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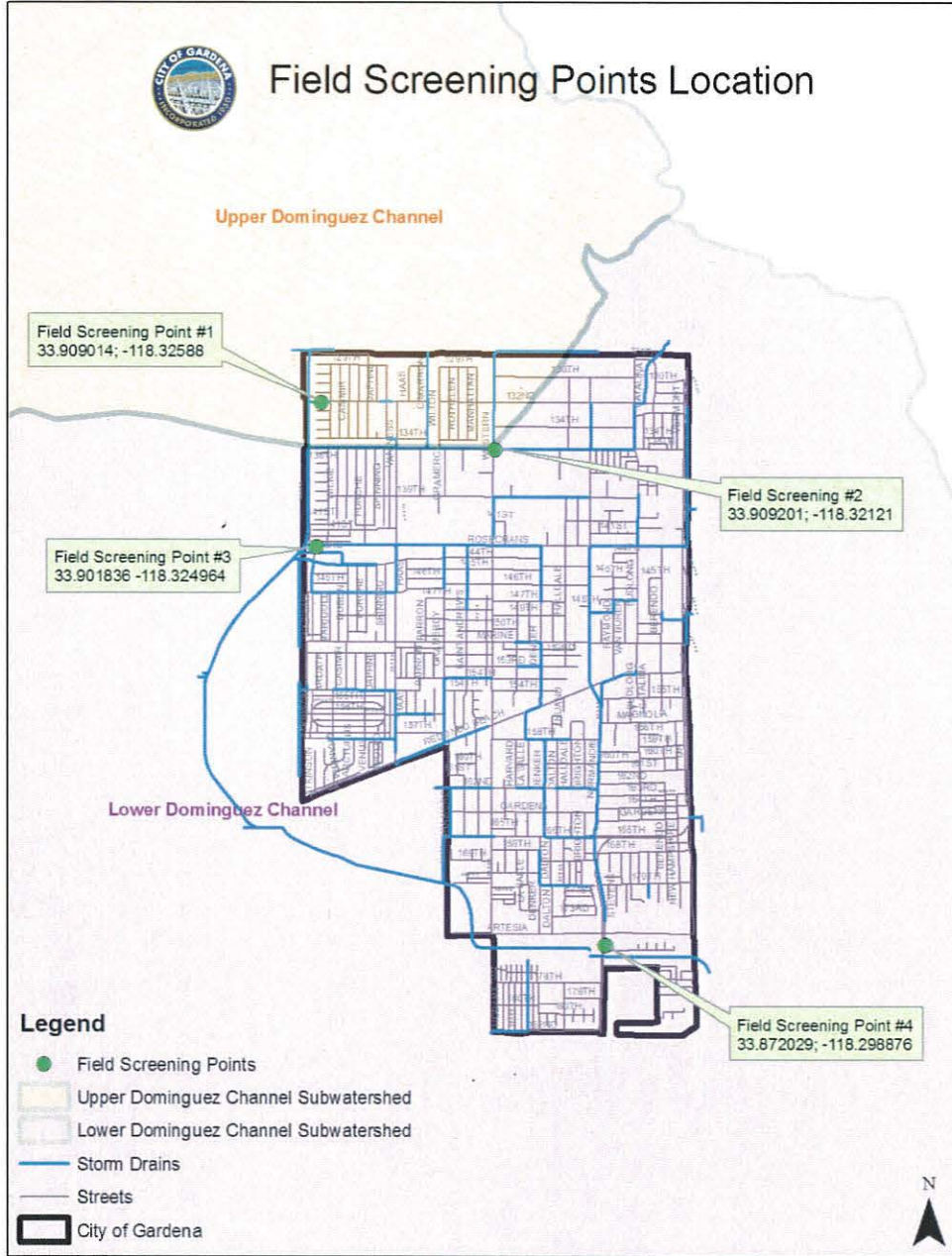


Appendix A-1
Field Screening – HUC 12
Location Map





Field Screening Points Location



Comment [ER25]: Provide a map of the drainage areas for each of the 2 proposed field screening points. Also, update this map to show only field screening points # 3 and 4.



Appendix A-2
Outfall & Receiving Water
Monitoring Location

DRAFT





Outfall & Receiving Water Monitoring Locations

Upper Dominguez Channel

Lower Dominguez Channel

Outfall 1
33.909017; -118.32568

Outfall 2
33.909458; -118.325608

Outfall 3
33.901283; -118.3266917

Outfall 4
33.871158; -118.3064139

R1
33.871472; -118.290794

Outfall 5
33.87125278; -118.882141

Legend

- ★ Receiving Water Monitoring Location
- Upper Dominguez Channel Subwatershed
- Lower Dominguez Channel Subwatershed
- MS4_Outfall
- Storm Drains
- Streets
- City of Gardena



Comment [ER26]: If mass emissions station will be used instead of R1, update map. Also update map if additional receiving water stations are proposed to address TMDL monitoring requirements in Dominguez Channel Estuary.



Appendix A-3

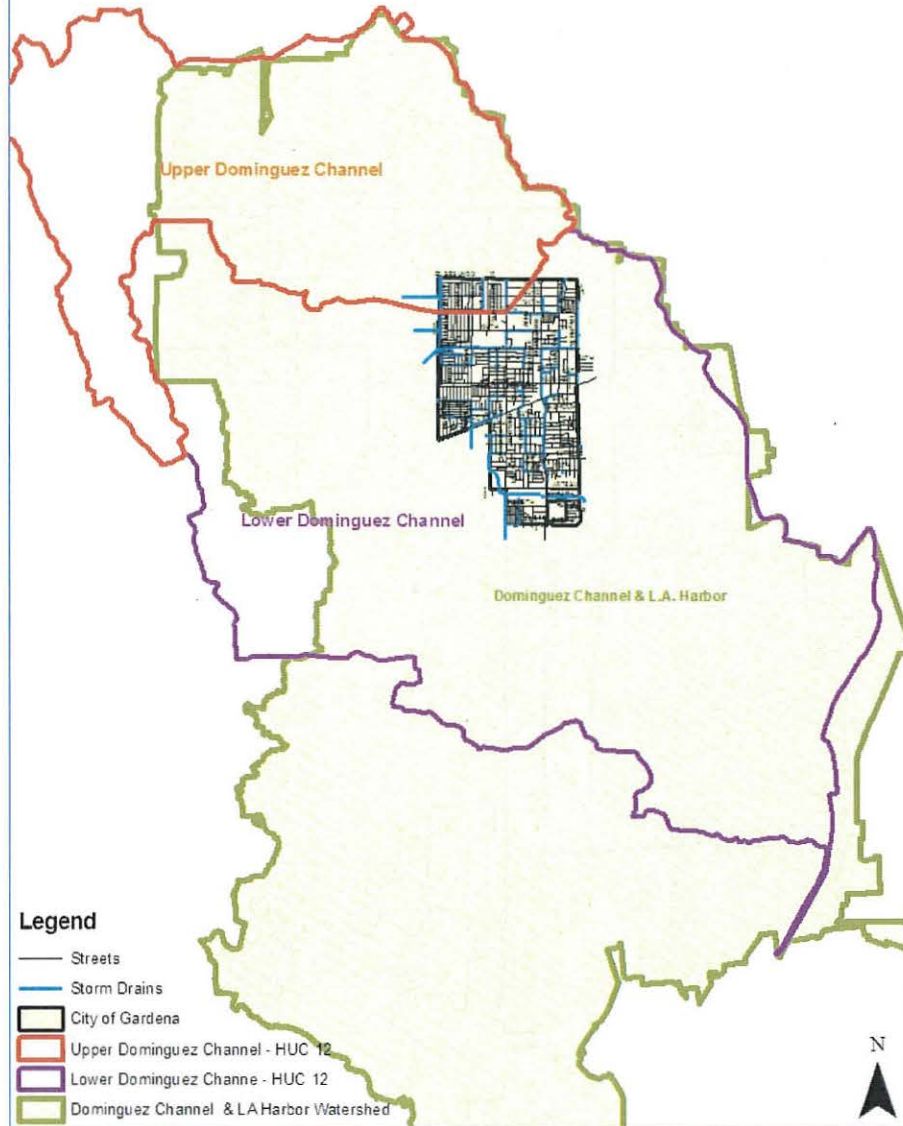
Watershed/Sub-watershed & City Boundary Map

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Watershed/Sub-Watershed & City Boundaries HUC - 12



Appendix A- 4

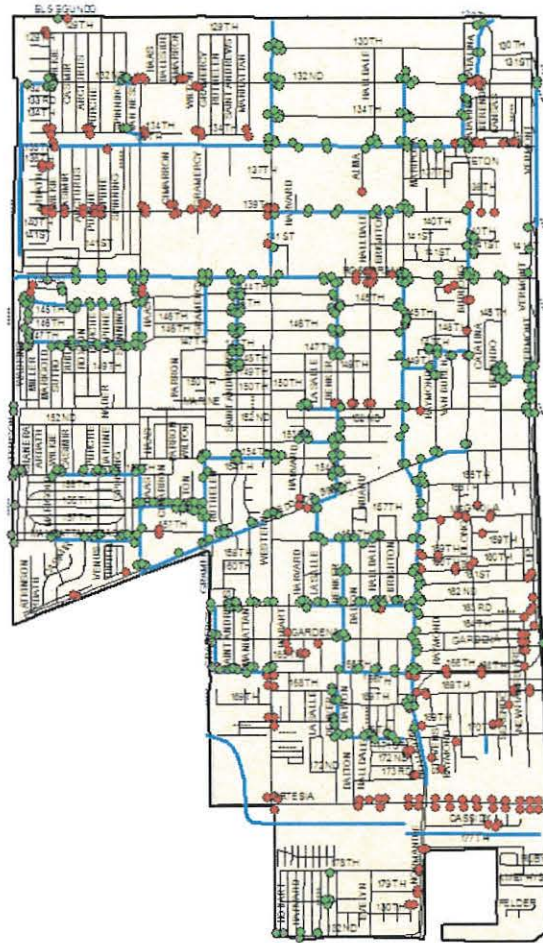
Storm Drain/Catch Basin Map

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City of Gardena Catch Basins



Legend

Catch Basin

OWNERSHIP

-  CITY
-  LACFCD
-  Storm Drains
-  Streets
-  Gardena



Appendix A-5

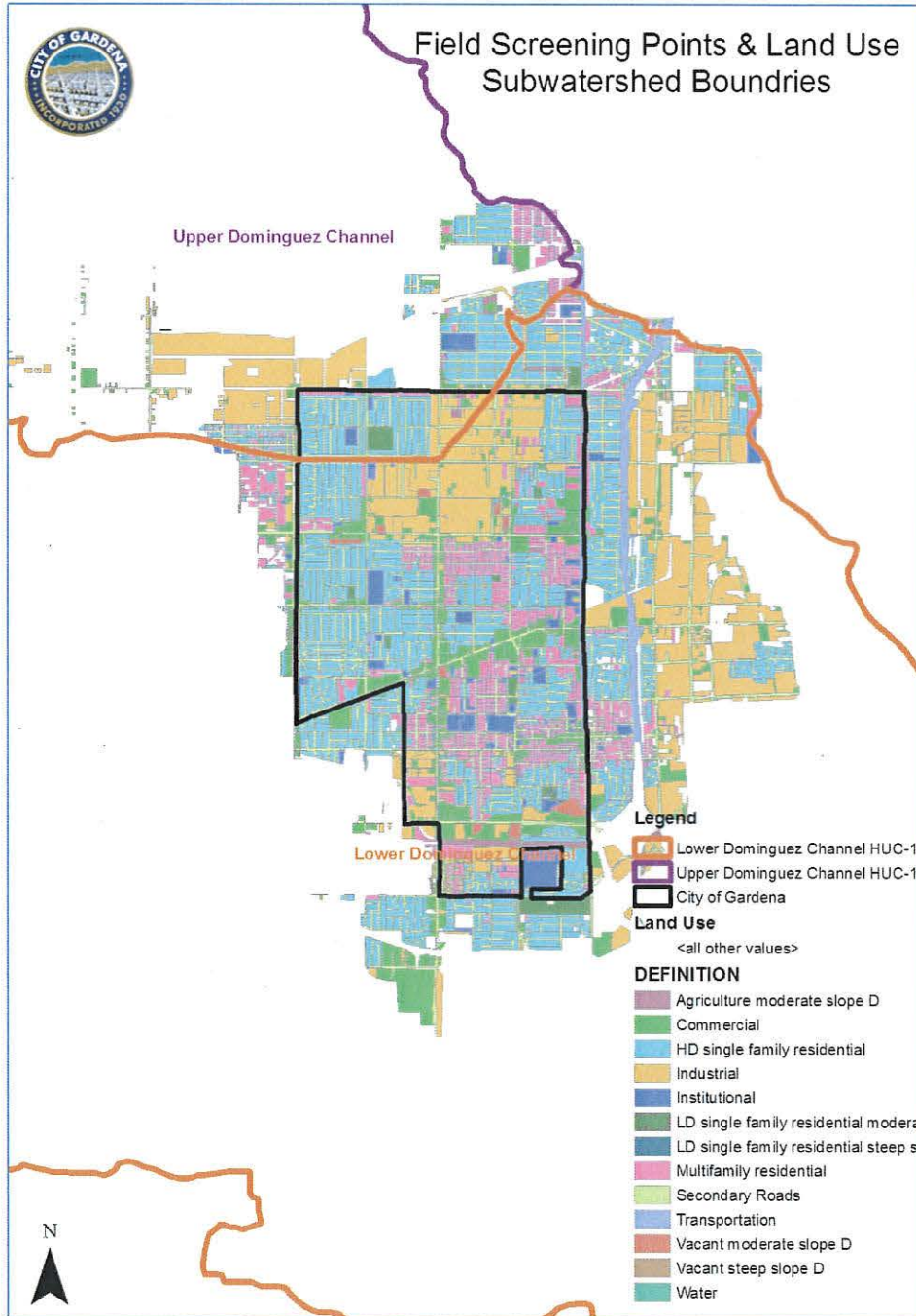
City Land Use Map

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Field Screening Points & Land Use Subwatershed Boundaries



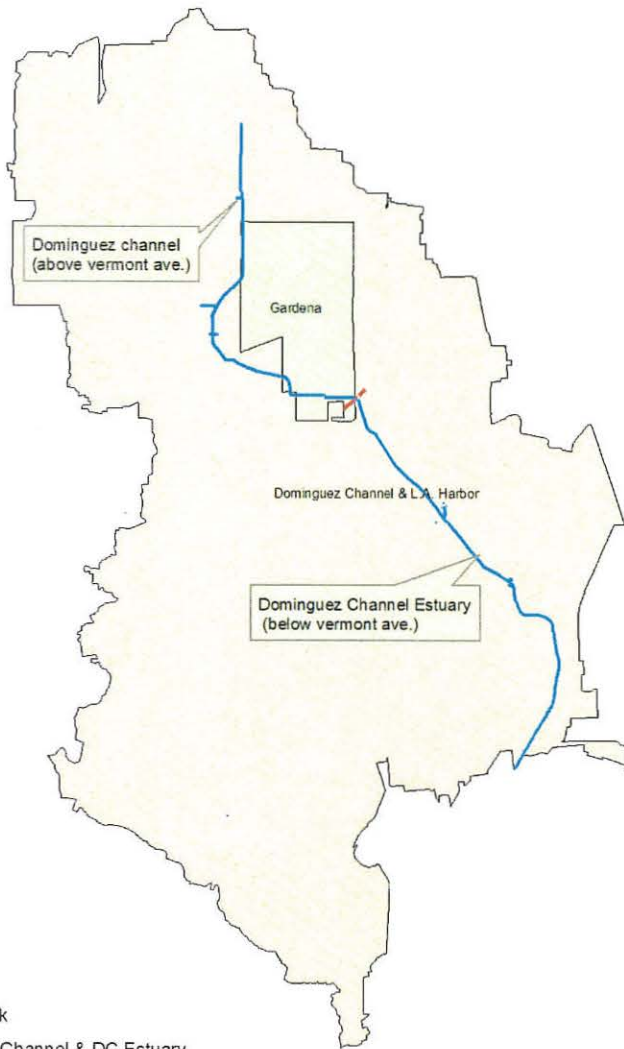
Appendix A-6

City Surface Waterbodies MAP





City of Gardena Surface Waterbodies



Legend

- Reach Break
- Dominguez Channel & DC Estuary
- City of Gardena
- Dominguez Channel & LA Harbor



Appendix B

2010 303(d) List for Dominguez Channel



Appendix B
Table XIV – 303(d) List – Dominguez Channel

2010 303 (d) List				
Water Body	Parameter	TMDL Status Date	Source	Pollutant Category
Dominguez Channel (below Vermont Avenue)	Ammonia	2019	Nonpoint/Point Source	TMDL Require List
	BMB	2019	Nonpoint/Point Source	TMDL Require List
	Benzo Pyrene (PAHs)	2019	Source Unknown	TMDL Require List
	Benzo Anthracene (PAHs)	2019	Source Unknown	TMDL Require List
	Chlordane (tissue)	2019	Source Unknown	TMDL Require List
	Chrysene (C1-C4)	2019	Source Unknown	TMDL Require List
	Coliform Bacteria	2007	Nonpoint/Point Source	TMDL Require List
	DDT (tissue & Sediment)	2019	Nonpoint/Point Source	TMDL Require List
	Dieldrin (tissue)	2019	Nonpoint/Point Source	TMDL Require List
	Lead (tissue)	2019	Nonpoint/Point Source	TMDL Require List
	PCBs	2019	Source Unknown	TMDL Require List
	Phenanthrene	2019	Source Unknown	TMDL Require List
	Pyrene	2019	Source Unknown	TMDL Require List
	Zinc (sediment)	2019	Nonpoint/Point Source	TMDL Require List
	Sediment Toxicity	2021	Nonpoint Source	TMDL Require List
Dominguez Channel (Above Vermont Avenue)	Ammonia	2019	Point Source	TMDL Require List
	Copper	2019	Nonpoint/Point Source	TMDL Require List
	Indicator Bacteria	2007	Nonpoint/Point Source	TMDL Require List
	Lead	2019	Nonpoint/Point Source	TMDL Require List

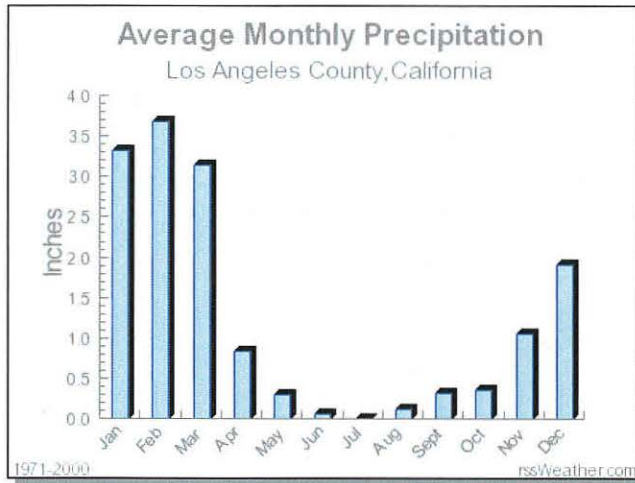


	Toxicity	2021	Nonpoint/Point Source	TMDL Require List
	Zinc	2019	Nonpoint/Point Source	TMDL Require List
	Diazinon	2019	Source Unknown	TMDL Require List

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Appendix C
LA County Precipitation Data




Month	Precipitation
Jan	3.33in.
Feb	3.68in.
Mar	3.14in.
Apr	0.83in.
May	0.31in.
Jun	0.06in.
Jul	0.01in.
Aug	0.13in.
Sept	0.32in.
Oct	0.37in.
Nov	1.05in.
Dec	1.91in.

The driest month in Los Angeles County is **July** with 0.01 inches of precipitation.



Los Angeles Regional Water Quality Control Board

TO: Los Angeles County MS4 Permittees and City of Long Beach

FROM: Samuel Unger, P.E.
Executive Officer 

DATE: August 7, 2015

SUBJECT: CLARIFICATION REGARDING FOLLOW-UP MONITORING REQUIREMENTS IN RESPONSE TO OBSERVED TOXICITY IN RECEIVING WATERS PURSUANT TO THE MONITORING & REPORTING PROGRAM (ATTACHMENT E) OF THE LOS ANGELES COUNTY MS4 PERMIT (ORDER NO. R4-2012-0175)

The Los Angeles County MS4 Permit, Attachment E requires chronic aquatic toxicity monitoring in receiving waters during both wet and dry weather conditions to determine whether designated beneficial uses are fully supported. Further, Attachment E requires additional monitoring at MS4 outfalls where aquatic toxicity is present above a certain effect level in downstream receiving waters to determine whether MS4 discharges are causing or contributing to the aquatic toxicity. In this situation, outfall monitoring must either entail monitoring for specific pollutants identified in a toxicity identification evaluation (TIE) in the downstream receiving water, or for aquatic toxicity itself, where the specific pollutants could not be identified through the TIE conducted on the downstream receiving water.

In its comments on the draft Integrated Monitoring Programs (IMPs) and Coordinated Integrated Monitoring Programs (CIMPs) submitted per the Los Angeles County MS4 Permit, the Los Angeles Water Board provided clarification and recommendations to Permittees regarding aquatic toxicity monitoring, particularly pertaining to the requirement to conduct chronic toxicity tests in dry and wet weather conditions and requirements for conducting a TIE and outfall monitoring. Subsequently, on December 9, 2014, Board staff met with several Permittees regarding its comments. During this meeting it was apparent that further clarification was necessary regarding requirements for follow-up monitoring when aquatic toxicity is present in downstream receiving waters. This memo provides additional clarification and applies to all IMPs and CIMPs developed pursuant to Part VI.B of the Los Angeles County MS4 Permit and Part VII.B of the City of Long Beach MS4 Permit.

It is acknowledged, however, that this memo may not address every situation that is encountered. We encourage the Permittees to approach toxicity testing and the TIE and TRE procedures thoughtfully and thoroughly in the interest of identifying and eliminating any source(s) of toxicity in MS4 discharges as expeditiously as possible and to consult with Los Angeles Water Board staff if you need assistance or clarification.

If you have any questions regarding these clarifications, please contact Renee Purdy at Renee.Purdy@waterboards.ca.gov or Shirley Birosik at Shirley.Birosik@waterboards.ca.gov.

The memo addresses requirements for follow-up monitoring in four **receiving water** scenarios where toxicity is present:

- Toxicity is present, but not above the TIE trigger as defined in Attachment E, Part XII.I.1¹;
- Toxicity is present above the TIE trigger and the TIE identifies the constituent(s) causing the toxicity;
- Toxicity is present above the TIE trigger during wet weather, but the TIE is inconclusive; and
- Toxicity is present above the TIE trigger during dry weather, but the TIE is inconclusive.

The memo also addresses the several scenarios once **outfall** toxicity testing has been triggered. Attached to the memo are several simplified flowcharts to aid in understanding the process.

An inconclusive TIE is defined as a TIE for which the cause of toxicity cannot be attributed to a constituent or class of constituents (e.g., metals, insecticides, etc.) that can be targeted for monitoring even after conducting appropriate Phase I and Phase II TIE treatments. This outcome may result from either non-persistent toxicity such that the TIE treatments cannot be successfully completed on the toxic sample, or from the inability with available Phase I and Phase II TIE

An **inconclusive TIE** is one for which the cause of toxicity cannot be identified after the conclusion of TIE Phases I and II.

If a TIE is inconclusive:

- ✓ Check QA/QC
- ✓ Evaluate sensitive species selection
- ✓ Initiate future TIEs earlier (to address non-persistent toxicity)
- ✓ Conduct all phases of TIE

completed on the toxic sample, or from the inability with available Phase I and Phase II TIE treatments to isolate the constituent or class of constituents causing the toxicity. If the TIE is inconclusive due to non-persistent toxicity, the Los Angeles Water Board expects that Permittees will proactively identify and implement actions during the subsequent upstream and/or outfall toxicity sampling event to improve the likelihood of a conclusive TIE, while also following the steps below. Where a TIE is inconclusive due to the inability to determine the constituent(s) causing the toxicity, Permittees should evaluate further steps to improve the TIE outcome including sensitive species selection, QA/QC, and the need to conduct Phases I through III of a TIE, among others.

¹ Permit references correspond to the Los Angeles County MS4 Permit (Order No. R4-2012-0175)

TRIGGERS FOR ADDING TOXICITY MONITORING TO UPSTREAM RECEIVING WATER MONITORING / OUTFALL MONITORING:

1. If toxicity is present as determined based on a fail of the Test of Significant Toxicity (TST) t-test as specified in the Permit (Attachment E, Part XII.G.4) during wet or dry weather, but not above the TIE trigger (which is defined as when the survival or sublethal endpoint demonstrates a ≥ 50 Percent Effect at the IWC as per Attachment E, Part XII.I.1), then:
 - a. Toxicity monitoring will be added to the next existing upstream receiving water site(s) during the same condition (wet or dry weather) for which toxicity was determined to be present. Monitoring for toxicity at the next existing upstream receiving water site(s) will occur during the next monitoring event that is at least 30 days following the original toxicity sample collection. Toxicity monitoring at individual receiving water sites will continue until (1) the deactivation criterion (i.e., two consecutive samples that pass the pass/fail TST t-test during the same condition) is met at the receiving water site or (2) a TIE is triggered and conclusively identifies the constituent or class of constituents causing toxicity, in which case the process outlined in Bullet 2 below is followed. OR
 - b. If there is no upstream receiving water monitoring site already established as part of the monitoring program, continue receiving water toxicity monitoring at the original site until (1) the deactivation criterion (i.e., two consecutive samples that pass the pass/fail TST t-test during the same condition) is met at the original receiving water site or (2) a TIE is triggered at the original site and conclusively identifies the constituent or class of constituents causing toxicity, in which case the process outlined in Bullet 2 below is followed. Also, conduct an evaluation similar to the TRE outlined in Attachment E, Part XII.J to identify, to the extent practicable, the source(s) of toxicity with the goal of identifying cause(s) of toxicity, paying particular attention to sources of potential constituent(s) causing toxicity (e.g., fipronil).
 - i. If there is no upstream receiving water monitoring site already established as part of the monitoring program and toxicity is present during dry weather, actions taken as part of the non-stormwater program (e.g., source identification and elimination or treatment of unauthorized non-stormwater discharges that are a source of pollutants) should be utilized to support the TRE.
 - ii. If there is no upstream receiving water monitoring site already established as part of the monitoring program and toxicity is present during wet weather, consider the following actions to support TRE: evaluating land uses and potential associated source(s) in the drainage area, evaluation of other permitted discharges, and evaluation of inspection activities. AND
 - c. If there is no upstream receiving monitoring site already established as part of the monitoring program and more than one occurrence of a fail of the TST t-test occurs at the original receiving water site within 3 years, then evaluate opportunities to conduct toxicity monitoring at upstream receiving water sites (either newly established or sites utilized by other monitoring programs), including tributaries.

2. If toxicity is present at a level exceeding the TIE trigger and the TIE identifies the constituent or class of constituents causing toxicity, then:
 - a. Do not add toxicity monitoring to upstream sites. AND
 - a. During the same condition, add the identified constituent or constituents within the class of constituents² to the monitoring site where toxicity was identified, the upstream receiving water site(s), and upstream outfall site(s) starting with the next monitoring event that is at least 45 days following the toxicity sample collection. Monitoring for the identified constituent(s) will continue until the deactivation criterion (i.e., two consecutive samples do not exceed Receiving Water Limitations (RWLs), Water Quality Based Effluent Limitations (WQBELs), or other appropriate threshold or guideline if there is no numeric RWL or WQBEL, for the identified constituents during the same condition) is met at the individual site. Where constituent(s) are identified in the outfall(s) above the RWL(s), WQBEL(s), or other appropriate threshold or guideline commence TRE at each corresponding outfall location per Attachment E, Part XII.J.
3. If toxicity is present at a level exceeding the TIE trigger during wet weather and the TIE is inconclusive, then:
 - a. Add toxicity monitoring to the next existing upstream receiving water site(s) during the next monitoring event that is at least 45 days following the original toxicity sample collection. Toxicity monitoring at individual receiving water site(s) will continue until (1) the deactivation criterion (i.e., two consecutive samples that pass the pass/fail TST t-test during the same condition) is met at the receiving water site or (2) a TIE is triggered and conclusively identifies the constituent or class of constituents causing toxicity, in which case the process outlined in Bullet 2 above is followed. AND
 - b. The second inconclusive TIE in 3 years during wet weather would trigger outfall toxicity testing at upstream outfall sites (i.e., (1) outfall sites located between the receiving water site and the nearest upstream receiving water site located on the same waterbody and (2) outfall sites located on tributaries that have a confluence with the waterbody where the confluence is located between the receiving water site and the nearest upstream receiving water site located on the same waterbody) following the process outlined below in “Steps Related Outfall Toxicity Testing” during the next monitoring event that is at least 45 days following the original toxicity sample collection. OR
 - c. As an alternative to the outfall monitoring described in Bullet 3.b., Permittees may propose an alternative approach any time after the first inconclusive TIE, which could include utilizing upstream receiving water sites (either newly established or sites utilized by other monitoring programs), including tributaries, additional outfall sites, and/or different outfall sites. However, the outfall monitoring approach described in Bullet 3.b. must be followed until Regional Water Board EO approval of the alternative approach.

² Using appropriate detection limits

4. If toxicity is present at a level exceeding the TIE trigger during dry weather and the TIE is inconclusive, then:
 - a. Add toxicity monitoring to the next existing upstream receiving water site(s) during the next monitoring event that is at least 45 days following the original toxicity sample collection. Toxicity monitoring at individual receiving water site(s) will continue until (1) the deactivation criterion (i.e., two consecutive samples that pass the pass/fail TST t-test during the same condition) is met at the receiving water site or (2) a TIE is triggered and conclusively identifies the constituent or class of constituents causing toxicity, in which case the process outlined in Bullet 2 above is followed during the next monitoring event that is at least 45 days following the original toxicity sample collection. AND
 - b. Add toxicity testing to upstream outfall sites (i.e., (1) outfall sites located between the receiving water site and the nearest upstream receiving water site located on the same waterbody and (2) outfall sites located on tributaries that have a confluence with the waterbody where the confluence is located between the receiving water site and the nearest upstream receiving water site located on the same waterbody) following the process outlined below in “Steps Related Outfall Toxicity Testing” during the next monitoring event that is at least 45 days following the original toxicity sample collection. OR
 - c. As an alternative to the outfall monitoring described in Bullet 4.b above, Permittees may propose an alternative approach any time after the first inconclusive TIE, which could include utilizing upstream receiving water sites (either newly established or sites utilized by other monitoring programs), including tributaries, additional outfall sites, and/or different outfall sites. However, the outfall monitoring approach described in Bullet 4.b above must be followed until Regional Water Board EO approval of the alternative approach.

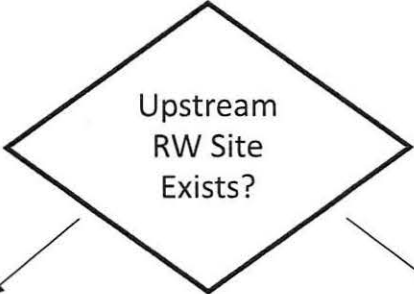
STEPS RELATED TO OUTFALL TOXICITY TESTING ONCE TRIGGERED:

1. If toxicity is not present as determined based on pass of the TST t-test as specified in the Permit, then continue toxicity testing during the same condition
2. (i.e. wet or dry weather) until (1) meeting the deactivation criterion (i.e., two consecutive samples that pass the pass/fail TST t-test during the same condition), or (2) a TIE conducted at the downstream receiving water site conclusively identifies the constituent or class of constituents causing toxicity, or (3) the discharge is eliminated.
3. If toxicity is present as determined based on fail of the TST t-test as specified in the Permit, but not above the TIE trigger, then continue toxicity testing during the same condition until (1) meeting the deactivation criterion (i.e., two consecutive samples that pass the pass/fail TST t-test during the same condition), or (2) a TIE conducted at a downstream receiving water site conclusively identifies the constituent or class of constituents causing toxicity, or (3) the discharge is eliminated. Concurrently conduct an evaluation similar to the TRE in Attachment E, Part XII.J to identify, to the extent practicable, the source(s) of toxicity with the goal of addressing cause(s) of toxicity, paying particular attention to sources of potential constituent(s) causing toxicity (e.g., fipronil).

- a. If toxicity is present in the non-stormwater discharge, actions taken as part of the non-stormwater program (e.g., source identification and elimination or treatment of unauthorized non-stormwater discharges that are a source of pollutants) should be utilized to support the TRE.
 - b. If toxicity is present in the stormwater discharge, consider the following actions to support the TRE: evaluating land uses and potential associated source(s) in the drainage area, evaluation of other permitted discharges, and evaluation of inspection activities.
4. If toxicity is present at a level exceeding the TIE trigger and the TIE identifies the constituent or class of constituents causing toxicity, then:
- a. Discontinue toxicity testing at the outfall. AND
 - b. Add the identified constituent or constituents within the identified class of constituents³ during the same condition starting with the next monitoring event that is at least 45 days following the toxicity sample collection and monitor for those constituents at the outfall until meeting the deactivation criterion for those constituents (i.e., two consecutive samples do not exceed RWLs, WQBELs, or other appropriate threshold or guideline if there is no numeric RWL or WQBEL, for identified constituents), while simultaneously performing a TRE for the constituent(s) causing toxicity per Attachment E, Part XII.J.
5. If toxicity is present at a level exceeding the TIE trigger and the TIE is inconclusive, then continue toxicity testing during the same condition until (1) meeting the deactivation criterion (i.e., two consecutive samples that pass the pass/fail TST t-test during the same condition), or (2) a TIE identifies the constituent or class of constituents causing toxicity (proceed with following the process outlined in Bullet 3, above), or (3) eliminate the discharge. Concurrently conduct an evaluation similar to the TRE in Attachment E, Part XII.J to identify, to the extent practicable, the source(s) of toxicity with the goal of addressing cause(s) of toxicity, paying particular attention to identifying sources of potential constituent(s) causing toxicity that may not have been evaluated in the TIE (e.g., fipronil).
- a. If the TIE is inconclusive in the non-stormwater discharge, actions taken as part of the non-stormwater program (e.g., source identification and elimination or treatment of unauthorized non-stormwater discharges that are a source of pollutants) should be utilized to support the TRE.
 - b. If the TIE is inconclusive in the stormwater discharge, consider the following actions to support the TRE: evaluating land uses and potential associated source(s) in the drainage area, evaluation of other permitted discharges, and evaluation of inspection activities.

³ Using appropriate detection limits

**Receiving Water Toxicity
Present but Does *NOT* Exceed
TIE Trigger**



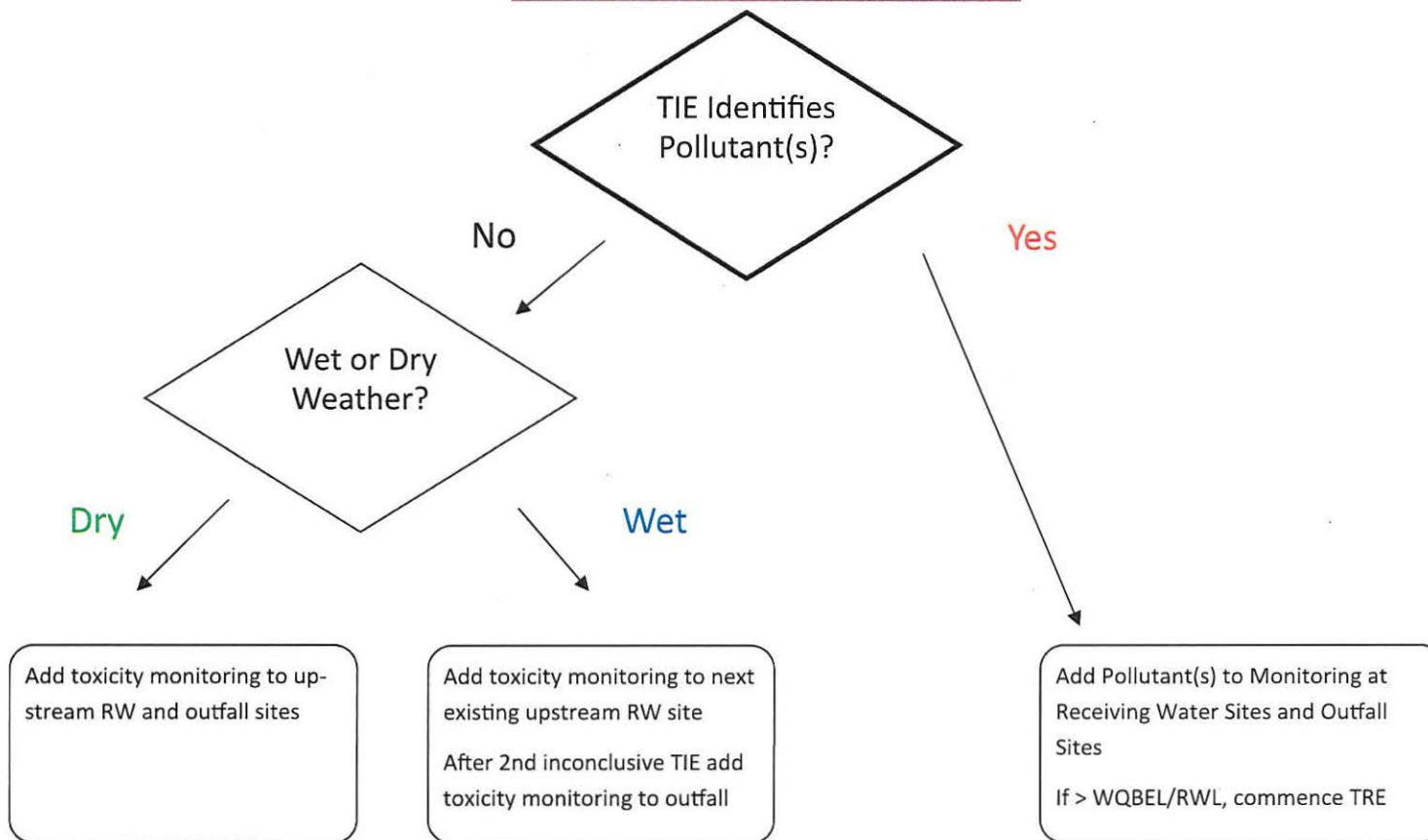
No

Yes

Continue monitoring toxicity at existing site
Conduct TRE-like evaluation
Evaluate potential for upstream monitoring

Add toxicity testing under same conditions (wet/dry)

**Receiving Water Toxicity
Present and Exceeds TIE
Trigger**



Outfall Toxicity Testing Once Triggered

