



Los Angeles Regional Water Quality Control Board

August 10, 2015

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

REVIEW OF THE CITY OF GARDENA 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 Regional Water Board has reviewed the revised monitoring program submitted on February 17, 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 individually 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 Regional Water Board.

The Regional Water Board has reviewed the City's revised monitoring program. The Regional Water Board's comments on the City of Gardena's IMP, including detailed information concerning necessary additions and revisions to the IMP, are found in Enclosure 1.

Please note that per the Notice of Deficient Submittal letter sent to the City on October 7, 2014, the City is subject to the baseline requirements of the LA County MS4 Permit, including Receiving Water Limitations (Part V.A.1) and applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachment N, Part E. Further, Permittees that are not subject to the Watershed Management Program provisions (Part VI.C) were required to either begin monitoring pursuant to the requirements of Attachment E of the LA County MS4 Permit by June 28, 2013, or submit an IMP by December 28, 2013. Please make the necessary additions and revisions to the IMP, as identified in the enclosures to this letter, and submit the revised IMP as soon as possible and no later than **September 09, 2015**. The revised IMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – 2nd Revised City of Gardena Integrated Monitoring Program" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Erum.Razzak@waterboards.ca.gov.

Upon approval of the revised IMP by the Executive Officer, the City must prepare to commence its monitoring program immediately. If the necessary revisions are not made, the City must comply with the Monitoring and Reporting Program and future revisions thereto, in Attachment E of the LA County MS4 Permit.

Until the City's IMP is approved by the Executive Officer, the monitoring requirements pursuant to Order No. 01-182 and Monitoring and Reporting Program CI 6948, and pursuant to approved TMDL monitoring plans shall remain in effect for the City.

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

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

Enclosures: Enclosure 1 – Summary of Comments and Required Revisions

Los Angeles Regional Water Quality Control Board

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

City of Gardena

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
General		
		<p>As indicated in e-mail correspondence to the City from the Regional Board dated July 9, 2015 and discussed in a conference call with the City on July 16, 2015, the City may consider participating in the CIMP of the adjacent Dominguez Channel Watershed Management Area EWMP Group as an alternative to pursuing an individual Integrated Monitoring Program (IMP), to address all the required elements in Part II.E of Attachment E in the LA County MS4 Permit.</p> <p>The Draft CIMP of the aforementioned EWMP group can be found at: http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/index.shtml</p> <p>To join a EWMP Group and/or CIMP, the City should first contact the EWMP Group that they are interested in joining. It should be noted however that the opportunity to join an existing EWMP and/or CIMP group is nearing an end; therefore, if the City is interested in pursuing that alternative, it must do so immediately.</p>
		<p>As the State Water Board concluded its proceedings addressing the administrative petitions of the LA County MS4 Permit, Order R4-2012-0175, on June 16, 2015, correct all references to the MS4 administrative petition from the IMP.</p>
Section 1.0		<p>The IMP references the old LA County MS4 Permit Order No. 01-182 where Section 1.0 of the IMP references Attachment U. However, please note that the latest LA County MS4 Permit Order No. R4-2012-0175 (LA County MS4 Permit) is currently the active permit and therefore, the LA County MS4 Permit Order No. R4-2012-0175 should be referenced along with Attachment E, the Monitoring and Reporting Program, not Attachment U.</p>
Section 1.0		<p>The IMP states that “the Permit, under the WMP section, does not specify which pollutants and water quality standards must be monitored for or met. Discussions with the Regional Board staff</p>

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		<p>revealed that the water quality standards are mandated by federal regulations. They can be taken from the previous Permit under MS4 Permit’s MRP under Attachment U.”</p> <p>The LA County MS4 Permit Attachment E Table E-2 as well as Attachments L-R specifies the applicable receiving water limitations and water quality based effluent limitations to which MS4 discharges are subject. Attachment U of the previous LA County MS4 Permit Order No. 01-182 should not be referenced.</p>
Section 1.2 & Table 1		<p>Section 1.2 of the IMP states that the City intends to share costs with other cities listed in Table 1. The IMP needs to specify what type of monitoring (i.e. receiving water monitoring) the City plans on dividing its costs for and which cities are monitoring which stations. In addition, the City must provide a copy the final agreement(s) among the City and other Permittees listed in Table 1 of the IMP to conduct monitoring through an IMP as per Attachment E of the LA County MS4 Permit.</p>
Section 1.3 & 1.10	Attachment N Part E (page N-9)	<p>As per Attachment K Table K-13 of the LA County MS4 Permit, the City of Gardena is subject to WLAs for Dominguez Channel Estuary. Therefore:</p> <ul style="list-style-type: none"> • Section 1.3 of the IMP should 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). • Section 1.10 of the IMP should include WLAs for Dominguez Channel Estuary.
Section 1.4		<p>The IMP states that it cannot access receiving waters that the City cannot sample from outfalls because they are located on property owned and operated by the Los Angeles County Flood Control District (LACFCD).</p> <p>The LACFCD operates and maintains Dominguez Channel as flood control channels, and limits public access to certain portions of the channel banks, levees, and/or access roads.</p> <p>However, for the reaches of the channels that have gated access, the LACFCD allows others to access its facilities through their Flood Permitting process. For example, a number of MS4 permittees have already applied for and received their Flood Permits to begin their non-stormwater outfall screening and to find suitable locations for temporary and permanent water quality monitoring</p>

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		<p>stations. MS4 Permittees, including the LACFCD, have shown that they are able to safely take water quality samples during storm events, and therefore, LACFCD does not prohibit such activities.</p> <p>When an applicant applies for a Flood Permit, the duration for permit issuance is typically related to the quality and completeness of the application and required submittals, as well as the complexity of review. For example, if permanent structures are proposed in a LACFCD facility, particularly in the invert of a Corps-engineered channel funded by the Federal Government, the review is likely to take longer than a permit to just enter to take pictures and observations. On average, the review time given by the Land Development Division for Flood Permits is 4-6 weeks. Information on Flood Permit requirements, forms, applications, references, fees, etc. can be found here: http://dpw.lacounty.gov/permits/</p>
Section 1.10		Section 1.10 states that “Tables below summarize list of constituents for NPDES and TMDL storm water outfall based monitoring and receiving water monitoring as well.” The IMP should be corrected to say: “Tables below summarize constituents for MS4 and TMDL receiving water, stormwater outfall, and non-stormwater outfall based monitoring.”
Table VI		Please correct typographical error in Table VI of the IMP: “Cooper” to “Copper”.
Table VI		“Toxicity”, “TIE”, and “303(d) list pollutants” should be added to Table VI of the IMP.
Table VIII & IX		Table VIII and IX of the IMP should specify the applicable salinity.
Section 1.13	LA County MS4 Permit Part V.A.1-4 (page 38-39) & VI.E.2 (141-145)	<p>The IMP states that, “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.”</p> <p>As per the Regional Water Board’s Notice of Deficient Submittal letter dated October 7, 2014, the City is subject to the baseline requirements of the LA County MS4 Permit. Therefore, condition (1) is not applicable. Furthermore, compliance will be determined based on an evaluation of monitoring data against receiving water limitations and WQBELs as per Parts V.A, VI.E.2.d.i.(1)-(3), VI.E.2.e.i.(1)-(3), or VI.E.3.e of the LA County MS4 Permit.</p>

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
	Attachment D Part III.B (page D-5)	The IMP should clearly specify that that 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 pollutants unless another test procedure is required under 40 CFR subchapters N or O or is otherwise specified in the Los Angeles County MS4 Permit for such pollutants [40 CFR sections 122.41(j)(4) and 122.44(i)(iv)].
Table X	Attachment D Part III.B (page D-5) & Attachment E Part III.G (page E-6)	<p>Table X of the IMP lists “Congeners3”. Which and how many congeners will be used should be specified preferably as a footnote in Table X of the IMP.</p> <p>Please note that monitoring for PCBs in sediment or water should be reported as the summation of aroclors and a minimum of 40 (and preferably at least 50) congeners. See Table C8 in the state’s Surface Water Ambient Monitoring Program’s Quality Assurance Program Plan (Page 72 of Appendix C), which can be downloaded at http://www.waterboards.ca.gov/water_issues/programs/swamp/docs/qapp/qaprp082209.pdf for guidance.</p>
Table X		For Aroclors, the IMP lists method EPA 608. Samples should be analyzed using EPA Method 8270 or 1668C (as appropriate), and High Resolution Mass Spectrometry.
Table X	Part III.G (page E-6)	Table X of the IMP is missing the method for Suspended-Sediment Concentration (SSC). SSC shall be analyzed per American Society for Testing and Materials (ASTM) Standard Test Method D-3977-97.
Table X		The IMP lists EPA 200.8 as the method for Mercury. For Mercury (Hg) EPA Method 245.7 or 1631E should be used (not Method 245.1) to get sufficiently sensitive minimum levels for analytical results to be compared with the water quality objective.
Table XI		Please update Table XI – Implementation Schedule of the IMP to include receiving water, non-stormwater outfall monitoring, and any additional changes in the revised IMP.
Table X	Table E-2 (page E-17 to E-20)	<p>Table X – WMP Monitoring for Non-TMDL Water Quality Standards in the IMP is missing 2 constituents:</p> <ul style="list-style-type: none"> • E. coli • Benzo(k)flouranthene. <p>In addition, Table X of the IMP does not show the correct MLs for the following constituents:</p> <ul style="list-style-type: none"> • Total Coliform • Fecal Coliform

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		<ul style="list-style-type: none"> • Enterococcus • Bis(2-Chloroethoxy) methane • Bis(2-Chloroisopropyl) ether • Bis(2-Chloroethyl) ether • Bis(2-Ethylhexyl) phthalate • Butyl benzyl phthalate • 2-Chloroethyl vinyl ether • 2-Chloronaphthalene • 4-Chlorophenyl phenyl ether • Dibenzo(a,h)anthracene • 1,3-Dichlorobenzene • 3,3-Dichlorobenzidine • Diethyl phthalate • di-n-Butyl phthalate • 2,4-Dinitrotoluene • 1,2-Diphenylhydrazine • di-n-Octyl phthalate • Fluoranthene • Fluorene • Hexachlorobenzene • Naphthalene • Nitrobenzene <p>Please refer to the LA County MS4 Permit Attachment E Table E-2 for the correct MLs for the aforementioned constituents.</p>
	Part VI.C.1.d.iii (page E-16), VI.D.1.c.iii (page E-17), & VIII.B.1.c.iii (page E-23)	The IMP states that non-stormwater outfall-based monitoring will address 303(d) listed pollutants. The IMP should also specify that receiving water and stormwater outfall-based monitoring will include testing for 303(d) listed pollutants that are not addressed by TMDLs.
Section 1.17 & Table XI		Please correct typographical error in the IMP Section 1.17 and Table XI: "CIMP" to "IMP".
Receiving Water Monitoring		
Section 1.0	Parts VI.A, VI.C, & VI.D	The IMP references the types of monitoring required by the permit, but omits receiving water monitoring for pollutants other than those addressed by a TMDL. Receiving water monitoring is required during both wet and dry weather per LA County MS4 Permit Attachment E, Parts VI.A, VI.C, and VI.D.
Section 1.2 & Table XI		Section 1.2 of the IMP states that "Though the SWAMP should be responsible for performing ambient monitoring, it is not known

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		<p>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.”</p> <p>Table XI of the IMP states that “if no data exists the City shall contract for the CWH to conduct ambient monitoring once during the term of the Permit for Dominguez Channel.”</p> <p>Please note that ambient monitoring data collected once during the term of the permit for Dominguez Channel and Dominguez Channel Estuary is not sufficient to fulfill the receiving water monitoring requirements of the LA County MS4 Permit.</p>
Section 1.2	LA County MS4 Permit: Part VI.E.1.c (page 141)	The IMP states that the City will be doing receiving water monitoring for wet and dry weather but it “opposes having to comply with wet weather standards in the receiving water”. The City must comply with all wet and dry weather TMDL monitoring requirements of the LA County MS4 Permit for receiving water except as provided in Part IV.A.4 of the LA County MS4 Permit.
Section 1.3	Part II.E.1 (page E-4)	As stated above, receiving water monitoring during both wet and dry weather is a requirement of the LA County MS4 Permit. Therefore, all paragraphs in Section 1.3 of the IMP except the first and last paragraph must be deleted. The City must comply with all wet and dry weather TMDL monitoring requirements of the LA County MS4 Permit for receiving waters.
Section 1.3		<p>The IMP states that “the City will conduct receiving monitoring using the Los Angeles County mass emission station located at the Dominguez Channel and Vermont Avenue in the City of Gardena.”</p> <p>This statement is incorrect. The LA County mass emissions station (S28) in Dominguez Channel is located at Dominguez Channel and Artesia Boulevard in the City of Torrance. Therefore, as per the location indicated in Appendix A-2 of the IMP, R1 is not a LA County mass emissions station. The IMP must be revised to indicate whether the City propose to install a mass emissions station at the site indicated in Appendix A-2 of the IMP or if it propose to use S28.</p>
Section 1.10	Attachment N Part E (page N-5 to N-9)	As per the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL (Harbor Toxics TMDL), the IMP must include and/or incorporate all the elements of a technically appropriate Monitoring and Reporting Plan (MRP) and

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		<p>Quality Assurance Project Plan (QAPP). The IMP must state that the City will report compliance and non-compliance with waste load allocations (WLAs) as part of annual reports submitted to the Regional Board. In addition, the IMP must include and/or incorporate elements of a QAPP which are protocols for sample collection, standard analytical procedures, and laboratory certification. All samples shall be collected in accordance with SWAMP protocols.</p> <p>Monitoring shall begin six months after the IMP is approved by the Executive Officer or no later than October 2015 as stated in the IMP, whichever is first. The IMP must address the monitoring requirements for WLAs. The City shall submit annual monitoring reports.</p> <p>The Regional Board Executive Officer may reduce, increase, or modify monitoring and reporting requirements, as necessary, based on the results of the TMDL monitoring program. Currently, several of the constituents of concern have numeric targets that are lower than the readily available detection limits. As analytical methods and detection limits continue to improve (i.e., development of lower detection limits) and become more environmentally relevant, the City shall incorporate new method detection limits in the IMP.</p>
Section 1.10	Attachment N Part E (page N-5 to N-9)	<p>As per the Dominguez Channel, Torrance Lateral, and Dominguez Channel Estuary Monitoring Plan in the Harbor Toxics TMDL, the IMP does not provide details about the water column, sediment, and fish tissue monitoring for Dominguez Channel and Dominguez Channel Estuary. The IMP must include information on how the City is choosing to comply with the applicable TMDL requirements in the Harbor Toxics TMDL. To choose a compliance method, please refer to Attachment N Part E.4 of the LA County MS4 Permit. For detailed requirements, refer to Basin Plan, Chapter 7, Section 7-40.1, "Monitoring Plan" (pages 22-24 of Attachment A of Resolution No. 11-008) and see below:</p> <p>For Dominguez Channel and Dominguez Channel Estuary, water and total suspended solids samples shall be collected at the outlet of the storm drains discharging to the Dominguez Channel and the Dominguez Channel Estuary. Fish tissue samples shall be collected in receiving waters of the Dominguez Channel Estuary. Sediment samples shall also be collected in the estuary.</p>

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		<p>• Water Column Monitoring Water samples and total suspended solids samples shall be collected during two wet weather events and one dry weather event each year. The first large storm event of the season shall be included as one of the wet weather monitoring events. Water samples and total suspended solid samples shall be analyzed for a suite of compounds including, at a minimum, metals, including lead, zinc, and copper, DDT, PCBs, Benzo[a] anthracene, Benzo[a]pyrene, Chrysene, Phenanthrene, and Pyrene. Sampling shall be designed to collect sufficient volumes of suspended solids to allow for analysis of the pollutants in the bulk sediment.</p> <p>In addition to TMDL constituents, general water chemistry (temperature, dissolved oxygen, pH, and electrical conductivity) and a flow measurement will be required at each sampling event. General chemistry measurements may be taken in the laboratory immediately following sample collection, if auto samplers are used for sample collection or if weather conditions are unsuitable for field measurements. In addition, toxicity shall be tested for in the freshwater portion of Dominguez Channel.</p> <p>Sediment Monitoring A sediment monitoring program shall be developed consistent with the selected method for compliance and all samples shall be collected in accordance with SWAMP protocols.</p> <p>a) If compliance will be determined based on achieving sediment quality targets, sediment chemistry samples shall be collected every two years for analysis of general sediment quality constituents and the full chemical suite as specified in SQO Part 1. In addition, benthic community effects shall be assessed in the Dominguez Channel Estuary.</p> <p>b) If compliance will be determined based on the SQO compliance method, sediment chemistry samples shall also be collected every five years (in addition to, and in between, the sediment triad sampling events as described below), beginning after the first sediment triad event, to evaluate trends in general sediment quality constituents and listed constituents relative to sediment quality targets. Chemistry data without accompanying sediment triad data shall be used to assess sediment chemistry trends and shall not be used to determine compliance.</p>

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		<p>Sediment quality objective evaluation as detailed in the SQO Part 1 (sediment triad sampling) shall be performed every five years in coordination with the Biological Baseline and Bight regional monitoring programs, if possible. Sampling and analysis for the full chemical suite, two toxicity tests and four benthic indices as specified in SQO Part 1 shall be conducted and evaluated. If moderate toxicity as defined in the SQO Part 1 is observed, results shall be highlighted in annual reports and further analysis and evaluation to determine causes and remedies shall be required in accordance with the EO approved monitoring plan. Locations for sediment triad assessment and the methodology for combining results from sampling locations to determine sediment conditions shall be specified in the IMP to be approved by the Executive Officer. The sampling design shall be in compliance with the SQO Part 1 Sediment Monitoring section (VII.E.).</p> <ul style="list-style-type: none"> • Fish Tissue Monitoring Fish tissue samples shall be collected every two years from the Dominguez Channel Estuary and analyzed for chlordane, dieldrin, toxaphene, DDT, and PCBs. The target species in the Dominguez Channel Estuary shall be selected based on residency, local abundance and fish size at the time of field collection. Tissues analyzed shall be based on the most common preparation for the selected fish species. <p>The details of the monitoring program including sampling locations and all methods shall be specified in the IMP to be approved by the Executive Officer.</p> <p>The City is responsible for conducting water, sediment, and fish tissue monitoring. However, the Regional Board continues to encourage the City to consider collaborating or coordinating their efforts with other responsible parties as identified in the Harbor Toxics TMDL and/or WMP/EWMP Groups to avoid duplication and reduce associated costs.</p> <p>Information about efforts by other responsible parties to meet the Harbor Toxics TMDL can be found on: http://www.waterboards.ca.gov/losangeles/board_decisions/basin_plan_amendments/technical_documents/bpa_66_R11-008_td.shtml</p>
Section 1.16		<p>In Section 1.16 Part I of the IMP, the City states that it will utilize the definition in Attachment A, which defines the wet season as</p>

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		the time period between October 1st and April 15th to simplify the wet weather definition. However, wet season and wet weather are different concepts. The City must use a definition of wet weather that is consistent with the TMDLs to which it is subject. Therefore, revise the IMP to delete the statement that the City will utilize the “wet season” definition in Attachment A to trigger wet weather sampling events.
Section 1.16		The IMP states that the driest month of the year is in August. Please provide precipitation data and/or other data to support that August is historically the driest month of the year.
Section 1.16	Part VI.D.1.b.ii (page E-17)	The IMP should define dry weather as when the flow is less than 20 percent greater than the base flow or as defined by effective TMDLs within the watershed.
Section 1.16	Part VI.D.1.d (page E-17)	The IMP should specify that parameters in Table E-2 of the LA County MS4 Permit will be monitored shall be monitored in the first year during the critical dry weather event.
Section 1.16	Part VI.C.1.e (page E-16)	The IMP should specify that parameters in Table E-2 of the LA County MS4 Permit shall be monitored in the first year of monitoring during the first significant rain event of the storm year.
Appendix A-2		The receiving water location indicated in Appendix A-2 of the IMP should be labeled as R1 to be consistent with Table II of the IMP.
Storm Water Outfall Based Monitoring		
Table IV		Based on the values given in Table IV of the IMP, the total acres of catchment area land for M1, M2, and M3 have been miscalculated. Please make the following corrections: <ul style="list-style-type: none"> • M1: 1748.5 acres • M2: 1482.41 acres • M3: 519.5 acres
Table III & IV	Part VIII.A.2.b (page E-21)	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. Table IV of the IMP is unclear if land use is provided for each catchment area or for each HUC-12 drainage area within the City’s jurisdiction. 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. Although Table III & IV of the IMP provide some information, the following information is missing: <ul style="list-style-type: none"> • Individual breakdowns (acres and percent) for each subwatershed (HUC 12 drainage area) within the City. Additionally, a brief written justification should be given on why

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		each of the field screening points best represent the City's land use.
Table IV, V & Appendix A-1		Table IV, V, and Appendix A-1 of the IMP use different identifiers to label outfall monitoring locations such as M1, 1, and Field Screening Point # 1 respectively. Please choose one type of alphanumeric identifier for consistency.
	Part VII.A.6 (page E-21)	The IMP must provide the location and length of all open channels and underground pipes 18 inches in diameter or greater (with the exception of catch basin connector pipes).
	Part VII.A.7 (page E-21)	The IMP should identify and map any dry weather diversions that divert flow for any of the major outfalls within the City's jurisdiction.
Section 1.4	Part II.E.2 (page E-4)	<p>Clarify that stormwater outfall monitoring will be used, as required, to determine whether the City's discharge is in compliance with applicable stormwater WQBELs derived from wet weather TMDL WLAs. Delete sentence that states that outfall monitoring cannot determine compliance with wet weather TMDL WLAs in the receiving water and the following sentence as these are inconsistent with permit requirements.</p> <p>The City must measure stormwater outfall monitoring results against the applicable receiving water limitations and WQBELs to which it is subject in Attachment N Part A and E.</p>
Section 1.4	Part VIII.A.2.a (page E-21)	<p>Section 1.4 of the IMP states that "[e]ach of the 3 field screening points will be sampled annually on a rotating basis". However, Appendix A-2 shows that the City falls within 2 HUC-12 drainage areas.</p> <p>Therefore, at least 2 field screening points, 1 for each HUC-12 drainage area, should be monitored per year.</p>
Section 1.5	Part VII.A.9 (page E-21)	Section 1.5 of the IMP notes that an inventory will be developed of major MS4 outfalls with known significant non-stormwater discharges and those requiring no further assessment. The IMP should state that this inventory will be updated annually.
	Part VII.A.10 (page E-21)	Storm drain outfall catchment area maps for each major outfall within the City's jurisdiction are missing. 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.
Section 1.10	Part VIII.B.1.d (page E-23)	Section 1.10 of the IMP should specify that for stormwater outfall monitoring, other parameters in Table E-2 identified as exceeding

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		the lowest applicable water quality objective in the nearest downstream receiving water monitoring station will be monitored.
Table VII	Attachment G Part VIII (page G-17)	Table VII - Municipal Action Levels in the IMP is missing Mercury from the list (0.32µg/L).
Section 1.16		Section 1.16 Part III of the IMP includes three different methods for compositing samples. Please revise the IMP to include one protocol for compositing samples. The protocol included in the first bullet under Part III is consistent with the protocol in Attachment E of the permit.
Appendix A	Part VII.A.1 (page E-20)	Maps in Appendix A of the IMP should label all surface water bodies within the City's jurisdiction (Dominguez Channel).
Non-Storm Water Outfall Based Monitoring		
Section 1.5	Part IX.G.1 (page E-27 to E-28)	<p>The IMP states that "The City will not perform non-stormwater outfall monitoring to determine compliance with TMDLs, other water quality standards, and action levels."</p> <p>As per Part IX.G.1 of the LA County MS4 Permit, the City must monitor for flow, WQBELs (TMDLs and non-stormwater action levels), 303(d) listed pollutants not addressed by a TMDL, pollutants identified in a TIE, and other parameters in Table E-2 of the LA County MS4 Permit exceeding the lowest applicable water quality objective in the nearest downstream receiving water station for compliance purposes.</p>
Section 1.5	Part IX.B.2 (page E-24)	Section 1.5 of the IMP states that there will be no further assessment reported in the inventory database if no flow is observed on at least 4 out of 5 visits. As per Part IX.B.2 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. Where changes are needed, the City shall make the changes in its written program documents, implement these changes in practice, and describe the changes within the next annual report.
Section 1.5		Section 1.5 of the IMP states that "outfalls will be monitored two additional times, after a 72 hour rain event." Please correct this statement to indicate that the 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. The IMP also states elsewhere that there will be 5 site visits. Please clarify the <i>screening frequency</i> for identifying significant non-stormwater discharges as separate from the <i>monitoring frequency</i> for monitoring the significant non-stormwater discharges that cannot be eliminated through the

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		source identification process and implementation of the City's IC/ID elimination program.
Section 1.5	Part IX.C.1 (page E-24 to E-25)	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.
Section 1.5	Attachment A (page A-11)	<p>The IMP states that for the field screening of non-stormwater outfall discharges, "outfalls greater than or equal to 36 inches in diameter will be located and mapped using GIS".</p> <p>The criteria for screening of non-stormwater outfall discharges should follow the definition of major outfalls: "Major municipal separate storm sewer outfall (or "major outfall") means a municipal separate storm sewer outfall that discharges from a single pipe with an inside diameter of 36 inches or more or its equivalent (discharge from a single conveyance other than circular pipe which is associated with a drainage area of more than 50 acres); or for municipal separate storm sewers that receive storm water from lands zoned for industrial activity (based on comprehensive zoning plans or the equivalent), an outfall that discharges from a single pipe with an inside diameter of 12 inches or more or from its equivalent (discharge from other than a circular pipe associated with a drainage area of 2 acres or more). (40 CFR § 122.26(b)(5))".</p>
Section 1.5	Part IX.G.4 & IX.G.5 (page E-28)	<p>The IMP states that, "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 or water quality standards on the 303(d) list for the receiving water." Pollutant concentrations must also be compared to Non-stormwater Action Levels before requesting any reduction in monitoring frequency during the second year of monitoring.</p> <p>Please note that as per Part IX.G.5 of the LA County MS4 Permit, following one 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.</p>
Section 1.5		In the last paragraph in Section 1.5 of the IMP, the following typographical errors and/or additions should be made: In the last sentence, correct "acute toxicity" to "aquatic toxicity".
Section 1.5	Part IX.G.1.d	The IMP should state that non-stormwater outfall monitoring will

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
	(page E-27)	include 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 inconclusive that non-stormwater outfall monitoring will include aquatic toxicity monitoring.
Section 1.6		<p>In the last paragraph 2nd to last sentence of Section 1.6 of the IMP, the following typographical error should be corrected: MAL to NSAL.</p> <p>Municipal Action Levels (MAL) apply to stormwater and Non-stormwater Action Levels (NSAL) apply to non-stormwater discharges.</p>
Section 1.12		Delete the statement that the City does not intend to conduct action level or any other non-stormwater monitoring at the outfall as this is inconsistent with permit requirements.
Section 1.16	Part IX.G.2 & IX.G.3 (page E-28)	The IMP should specify that non-stormwater outfall monitoring of significant non-stormwater discharges that cannot be eliminated will occur 4 times during the year following source identification, at the frequency identified in a TMDL Monitoring Plan if an outfall is subject to dry weather TMDLs.
Section 1.16	Part IX.H.2 (page E-28)	<p>The IMP should state that 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 unless an alternate protocol is proposed with justification and ultimately approved by the Regional Water Board.</p> <p>Please note that the IMP may propose grab sampling for non-stormwater outfall-based monitoring but must provide a rationale for the proposal.</p>
Aquatic Toxicity		
Section 1.9		The IMP states that 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”. The revised IMP must clearly state which receiving water monitoring stations will be used to test for aquatic toxicity.
Section 1.9.1 & 1.9.2		Please correct typographical error in the IMP for titles of Section 1.9.1 and 1.9.2: “Spices” to “Species”.
Section 1.9.2	Part XII.G (page E-31 to E-32)	The IMP describes methods for freshwater sensitive species selection. Note that for receiving waters with salinity ≥ 1 ppt (such as the Dominguez Channel Estuary) or for outfalls discharging to

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		receiving waters with salinity ≥ 1 ppt, the Marine and Estuarine Test Species and Methods must be used.
Section 1.9.3 (page 17)		Section 1.9.3 of the IMP lists US EPA guidance documents in the last sentence of the 1 st paragraph. The IMP should add " <i>Methods for Aquatic Toxicity Identification Evaluations, Phase III Toxicity Confirmation Procedures for Samples Exhibiting Acute and Chronic Toxicity (EPA/600/R-92/081, 1993)</i> " to the list of US EPA guidance documents.
Section 1.9.3 (page 19-20)		Two sections of the IMP have the same name "1.9.3 Toxicity Identification Evaluation (TIE)" on page 17 and 18. Please correct the title of Section "1.9.3 Toxicity Identification Evaluation (TIE)" on page 18 to "1.9.4 Toxicity Reduction Evaluation (TRE)".
Section 1.9.3 (page 20)		For Section 1.9.3 (page 20) of the IMP, "Permittees" is used in the first paragraph. Please substitute "Permittees" with "the City".
Section 1.9.4	Part VIII.B.1.c.vi (page E-23)	Revise IMP to state that, 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.