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## Los Angeles Regional Water Quality Control Board

January 26, 2015

Mr. Thomas G. Mauk  
Interim City Manager  
City of West Covina  
1444 W. Garvey Ave.  
P.O. Box 1440  
West Covina, CA 91793

**REVIEW OF THE CITY OF WEST COVINA 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. Mauk:

The Regional Water Board has reviewed the draft monitoring program submitted on June 30, 2014 by the City of West Covina (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.

Although the City submitted its monitoring program as a Coordinated Integrated Monitoring Program (CIMP)<sup>\*</sup>, pursuant to Part II.C and II.D of Attachment E of the LA County MS4 Permit, the City's submitted monitoring program will be addressed hereafter as an IMP. Pursuant to Part IV.B of Attachment E, the City may choose to also coordinate with other Permittees or existing watershed groups to develop and implement a CIMP in combination with the City's IMP, in order to address required elements set forth in Part II.E of Attachment E that are not addressed in the City's IMP. If the City's IMP does not address all required elements in Part II.E of Attachment E, it cannot be approved without the Regional Water Board having a copy of the final agreement(s) between the City and any other Permittee(s) or group(s) the City is collaborating with on a CIMP to address the remaining required elements. It should be noted that should any of the CIMPs the City is relying upon not receive an approval from the Regional Water Board Executive Officer, the City of West Covina would be responsible for complying with the monitoring requirements that the CIMP was intended to address.

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<sup>\*</sup> The intent of a CIMP is to allow multiple Permittees to coordinate monitoring on a watershed or subwatershed level.

The Regional Water Board has reviewed the City's draft monitoring program and has determined that the monitoring program submitted is missing the following substantive elements set forth in Part II.E to achieve the Primary Objectives as set forth in Part II.A of Attachment E of the LA County MS4 Permit:

- Receiving water monitoring
- Non-storm water outfall based monitoring

The Regional Water Board's comments on the City of West Covina'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 P, Part A. 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 **February 26, 2015**. The revised IMP must be submitted to [losangeles@waterboards.ca.gov](mailto:losangeles@waterboards.ca.gov) with the subject line "LA County MS4 Permit – Revised City of West Covina Integrated Monitoring Program" with a copy to [Ivar.Ridgeway@waterboards.ca.gov](mailto:Ivar.Ridgeway@waterboards.ca.gov) and [Erum.Razzak@waterboards.ca.gov](mailto: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](mailto: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](mailto:Ivar.Ridgeway@waterboards.ca.gov) or by phone at (213) 620-2150.

Sincerely,



Samuel Unger, P.E.  
Executive Officer

cc: Chris Vogt, Interim Public Works Director, City of West Covina

Enclosures: Enclosure 1 – Summary of Comments and Required Revisions  
Enclosure 2 – Applicable TMDLs, Action Levels, and 303(d)-listed Pollutants



Los Angeles Regional Water Quality Control Board

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

City of West Covina

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
<b>General</b>		
	Attachment D Part III.B and Attachment E Part III.G	<p>The draft IMP does not specify that that monitoring 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)].</p> <p>Note (if applicable):</p> <ul style="list-style-type: none"> <li>• Suspended-Sediment Concentration (SSC) shall be analyzed per American Society for Testing and Materials (ASTM) Standard Test Method D-3977-97.</li> <li>• Monitoring methods for trash shall be conducted in accordance with the applicable requirements specified in Part VI.E.5 of Order R4-2012-0175.</li> <li>• Aquatic toxicity shall be monitored in accordance with Part XII of Attachment E.</li> <li>• 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.</li> <li>• 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 <a href="http://www.waterboards.ca.gov/water_issues/programs/s_wamp/docs/qapp/qapprp082209.pdf">http://www.waterboards.ca.gov/water_issues/programs/s_wamp/docs/qapp/qapprp082209.pdf</a> for guidance. Samples should be analyzed using EPA Method 8270 or 1668C (as appropriate), and High Resolution Mass Spectrometry.</li> </ul>
	Part IV.A.6	The revised IMP must address all TMDL and non-TMDL monitoring requirements of the LA County MS4 Permit for receiving water, storm water outfall based monitoring, non-storm water outfall based monitoring, and regional studies, except as provided in Parts

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		IV.A.4 and 5 and IV.B.2 - 6 of the MRP. For clarity, the revised IMP should not include WLAs that are not applicable to the City (e.g., Coyote Creek WLAs in Table I). See Enclosure 2.
		The draft IMP includes various tables but does not clearly reference them in the text. The revised IMP should clearly reference any tables in the main text. Tables in the IMP listing TMDLs and/or other non-TMDL requirements should clearly indicate the applicable type of proposed monitoring (i.e., dry/wet weather, receiving water, storm water outfall based, non-stormwater outfall based).
Table VI	Table E-2	Table VI – WMP Monitoring for Non-TMDL Water Quality Standards in the draft IMP is incomplete. Please refer to the LA County MS4 Permit Attachment E Table E-2. Please note that Table E-2 lists constituents that need to be included as part of the receiving water monitoring (Part VI.C.1.e & Part VI.D.1.d), stormwater outfall-based monitoring (Part VIII.B.1.d) and non-stormwater outfall based monitoring (Part IX.G.1.e).
<b>Receiving Water Monitoring</b>		
Section 1.3	Part II.E.1	<p>The draft IMP states that the City will not be doing any receiving water monitoring due to its administrative petition. The draft IMP also states that any receiving water data will be obtained by the Surface Water Ambient Monitoring Program (SWAMP) and by other agencies including but not limited to the Council for Watershed Health (CWH) and the Sanitation Districts of Los Angeles County (SDLAC).</p> <p>However, data from SWAMP and the aforementioned agencies is not sufficient to fulfill the requirements of the LA County MS4 Permit. The revised IMP must include receiving water monitoring as per Parts VI.A and VI.C-D of Attachment E. Alternatively, the City must provide the final agreement(s) among the City and other Permittees under the LA County MS4 Permit to conduct the required receiving water monitoring through a CIMP per Part VI.B-D of Attachment E and provide a copy of the CIMP along with its revised IMP.</p>
		The City does not include receiving water monitoring at the mouth of the San Gabriel River as required by the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL (Harbor Toxics TMDL). The revised IMP must include this receiving water monitoring or, alternatively, the City must provide a copy of the final agreement among the City and other Permittees under the LA County MS4 Permit to conduct the

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		required monitoring through a CIMP per Part VI.B-D of Attachment E and provide a copy of the CIMP that addresses this receiving water monitoring requirement. Please refer to Enclosure 2 for requirements.
<b>Storm Water Outfall Based Monitoring</b>		
Sections 1.10-1.11 & Tables I & II	Part II.E.2	<p>The discussion and list of TMDL monitoring requirements contains erroneous references and values for some of the water quality-based effluent limitations (WQBELs), incomplete and erroneous interim and final compliance deadlines (Table II), and includes waterbodies and watersheds to which the City's MS4 does not discharge. For example, the Section 1.11 discusses TMDL requirements for the Rio Hondo and LA River, to which the City's MS4 does not discharge. Please refer to Enclosure 2 for TMDL requirements applicable to the City.</p> <p>Note that the TMDL monitoring requirements are also applicable to receiving water and non-storm water outfall based monitoring as per Part II.E.1 and Part II.E.3.</p>
	Part VII.A.1 – VII.A.10	<p>The draft IMP includes a map (Appendix A-3) of the City's location within the San Gabriel River Watershed. However, no sub-watersheds (HUC 12 drainage areas) are shown on that map. Also, a map is included showing storm drain locations (Appendix A-4) but no further description is given about them to indicate whether they are open channels or underground pipes 18 inches in diameter or greater (with the exception of catch basin connector pipes).</p> <p>The revised IMP should provide the following required elements:</p> <ul style="list-style-type: none"> <li>• Sub-watershed (HUC 12 drainage area) boundaries</li> <li>• Surface water bodies within the Permittee's jurisdiction</li> <li>• Effective Impervious Area (EIA) overlay (if available)</li> <li>• 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)</li> <li>• The location of all dry weather diversions</li> <li>• Notation of outfalls with significant non-storm water discharges (to be updated annually)</li> <li>• Storm drain outfall catchment areas (also known as drainage areas) for each major outfall within the Permittee's jurisdiction</li> </ul>
	Part VII.A.11	The draft IMP includes the coordinates for the field screening points in Appendix A-1. The following additional information

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		about the field screening points must be included: <ul style="list-style-type: none"> <li>• Ownership</li> <li>• General physical description</li> <li>• Photographs of the outfall (where possible)</li> </ul>
Section 1.4 & Appendix A-1	Part VIII.A.2.a	<p>The draft IMP does not provide information about the different subwatersheds (HUC 12 drainage areas) within the City's jurisdiction. Therefore, the Regional Water Board is unable to verify if there is at least one field screening point per subwatershed (HUC 12 drainage area).</p> <p>There is a discrepancy in the information provided on the number of field screening points the City has chosen. The main text in the draft IMP and Appendix A-1 list different numbers of field screening points. The revised IMP must reconcile any discrepancies between the main text and the appendix.</p> <p>The City intends to sample three times a year from one of the three field screening points on a rotating basis. However, the City must ensure that at least one field screening point per subwatershed (HUC 12), within the City's jurisdiction, is being sampled per year.</p>
Section 1.4	Part VIII.A.2.b	<p>Although the draft 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, the City must provide a land use map that shows the catchment area (also known as the drainage area) for each field screening point and tabular data. Specifically, the table should include:</p> <ul style="list-style-type: none"> <li>• Land use breakdown (acres and percent) for the entire City</li> <li>• Individual breakdowns for each subwatershed (HUC 12 drainage area) within the City</li> <li>• Individual breakdowns for the catchment area within the City that drains to each of the screening points</li> </ul> <p>Further, the City must provide additional justification with supporting data for the lack of a field screening point in the southern portion of the City.</p>
Section 1.17	Part VIII.B.1.b.i & VIII.B.1.b.ii	<p>Wet weather conditions in the draft IMP are defined as a "storm event that is greater than 0.1 inch and at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event". This definition is only applicable if the receiving water is the Santa Monica Bay or other ocean or estuary water body.</p>



IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		<p>However, when the receiving water body is a river, stream or creek, wet weather shall be defined as when the flow within the receiving water is at least 20 percent greater than the base flow or an alternative threshold as provided for in an approved IMP or CIMP, or as defined by effective TMDLs within the watershed. As per San Gabriel River Metals and Impaired Tributaries Metals and Selenium TMDL, wet weather is defined in San Gabriel Reach 2 and all the upstream reaches and tributaries of San Gabriel Reach 2 as when maximum daily flow of the river is equal to or greater than 260 cfs as measured at USGS station 11085000, located at the bottom of Reach 3 just above the Whittier Narrows Dam.</p>
	Part VIII.B.1.b.iii	<p>The draft IMP does not specify if the first storm event of the year is targeted. The Permittee is required to target the first storm event of the storm year with a predicted rainfall of at least 0.25 inch at a seventy percent probability of rainfall at least 24 hours prior to the event start time.</p>
Section 1.11 & Appendix B Table 1	Parts VIII.B.1.c & VIII.B.1.d	<p>The draft IMP does not include stormwater outfall based monitoring for:</p> <ul style="list-style-type: none"> <li>• Flow</li> <li>• Pollutants identified in a TIE conducted at the downstream receiving water monitoring station during the most recent sample event, or where the TIE conducted on the receiving water sample was inconclusive, monitoring for aquatic toxicity</li> <li>• Other parameters in Table E-2 identified as exceeding the lowest applicable water quality objective in the nearest downstream receiving water monitoring station</li> </ul> <p>Some CWA 303(d) list pollutants are not listed and Section 1.11 and various tables list waterbodies that are not applicable to the City's MS4 discharge. Please refer to Enclosure 2 for applicable 303(d)-listed pollutants that are not addressed by a TMDL for the waterbody.</p>
Section 1.17	Part VIII.C.1	<p>The sampling protocol in Section 1.17, subpart ii is inconsistent with Part VIII.C.1 of Attachment E. The IMP must be revised to ensure that water samples from field screening points will be taken in each hour of discharge for the first 24 hours of the storm water discharge or for the entire storm water discharge if it is less than 24 hours.</p>
Table III	Attachment G Part VIII	<p>Table III - Municipal Action Levels in the draft IMP is incomplete and lists incorrect constituents and erroneous values. Please refer to Enclosure 2 for requirements.</p>
<b>Non-Storm Water Outfall Based Monitoring</b>		

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
Section 1.5	Part II.E.3	<p>The draft IMP states that there will only be non-stormwater monitoring to detect and eliminate illicit connections and discharges.</p> <p>The draft IMP discusses non-stormwater monitoring of outfalls in the flood control channel of Rio Hondo, Reach 2; however, the City is in the San Gabriel River Watershed and therefore, non-stormwater outfall based monitoring is not a requirement for Rio Hondo Reach 2 which is part of the Los Angeles River Watershed.</p> <p>As per the LA County MS4 Permit, non-stormwater outfall based monitoring must be included in the revised IMP as outlined Part IX of Attachment E.</p>
Table IV		<p>Action levels given in the draft IMP should be applicable to all non-stormwater outfall-based monitoring. Table IV – Action Levels (Non-Stormwater) in the draft IMP is incomplete and lists incorrect constituents and values. Please refer to Enclosure 2 for requirements.</p>
<b>Regional Studies</b>		
	Part II.E.5 & XI	<p>No regional studies were included in the IMP. The County of LA has committed to doing all the bio-assessment monitoring for LA County. The revised IMP should reference LA County efforts to fulfill the requirements of the LA County MS4 Permit as per Part XIX of Attachment E.</p>
<b>Aquatic Toxicity</b>		
Section 1.9 & 1.17	Part XII	<p>The draft IMP includes toxicity testing only for storm water outfall-based monitoring and proposes that toxicity will be monitored three times a year beginning 2015-2016 wet season and annually thereafter. The draft IMP also gives a USEPA sampling protocol but does not state if the City intends to use that sampling protocol.</p> <p>Additionally, the draft IMP states that toxicity testing will be done using the 7-day test with <i>Ceriodaphnia dubia</i> (growth, survival) and the 7-day test with <i>Pimephales promelas</i> (biomass, survival). However, the static renewal toxicity test with the green alga, <i>Selenastrum capricornutum</i> (also named <i>Raphidocelis subcapitata</i>) (Growth Test Method 1003.0) is missing and no justification is given. Pursuant to Part XII.G.3 of Attachment E, Test Species Sensitivity Screening, to determine the most sensitive species for toxicity testing, the City must conduct two wet weather and two dry weather toxicity tests with a vertebrate, an invertebrate, and a plant. After this screening period, subsequent monitoring shall be</p>



IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		conducted using the most sensitive test species.  The revised IMP must meet all the requirements stated under Part XII of Attachment E.

Los Angeles Regional Water Quality Control Board

**Enclosure 2 – Applicable TMDLs, Action Levels, and 303(d)-listed Pollutants<sup>1</sup>**

**City of West Covina**

**Applicable TMDLs**

**\*San Gabriel River Watershed Management Area TMDLs (Attachment K Table K-6)**

- San Gabriel River and Impaired Tributaries **Metals and Selenium** (Attachment K Table K-12 & Attachment P Part A)
  - Walnut Creek (Attachment C Figure C-5)
    - West Covina drains to Walnut Creek, which is upstream of San Gabriel River Reach 2; therefore, the wet weather WLA for lead for San Gabriel River Reach 2 applies (see Attachment P Part A.2)
  - San Jose Creek (Attachment C Figure C-5)
    - West Covina drains to San Jose Creek Reach 1, which is upstream of San Gabriel River Reach 2; therefore, the wet weather WLA for lead for San Gabriel River Reach 2 applies (see Attachment P Part A.2)
    - West Covina drains to San Jose Creek Reach 1; therefore, the dry weather WLA for selenium, which is listed as “San Jose Creek Reach 1 and 2” applies (see Attachment P Part A.3)

\*As required by the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL (Harbor Toxics TMDL), San Gabriel River Watershed responsible parties identified in effective metals TMDLs for San Gabriel River are responsible for conducting water and sediment monitoring at the mouth of the San Gabriel River, to determine the Rivers’ contribution to the impairments in the Greater Harbor waters.<sup>2</sup> See Attachment K, Table K-13, note 2.

- Water Column Monitoring
  - Water samples and total suspended solids samples shall be collected at, at least one site 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 metals, DDT, PCBs, and PAHs. Sampling shall be designed to collect sufficient volumes of suspended solids to allow for analysis of the listed pollutants in the bulk sediment.
  - General water chemistry (temperature, dissolved oxygen, pH, and electrical conductivity) and a flow measurement shall 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.
- Sediment Monitoring

<sup>1</sup> References given below are from the LA County MS4 Permit.

<sup>2</sup> Reference: Basin Plan, Chapter 7, Section 7-40.1, “Monitoring Plan”

- For sediment chemistry, sediment samples shall be collected at, at least one site every two years for analysis of general sediment quality constituents and the full chemical suite as specified in SQO Part 1. All samples shall be collected in accordance with SWAMP protocols.

The details including sampling locations and all methods must be specified in the City's revised Integrated Monitoring Program (IMP).

**Non-Stormwater Action Levels: (Attachment G)**

- San Gabriel River Watershed Management Area (Part VI)

**Municipal Action Levels: (Attachment G Part VIII)**

- Conventional Pollutants
- Metals

**CWA 303(d)-listed Pollutants not Addressed by a TMDL**

<b>Water Body</b>	<b>Parameter</b>
Walnut Creek Wash (Drains from Puddingstone Reservoir)	Benthic- Macroinvertebrate Bioassessments
	Indicator Bacteria
	pH
San Jose Creek Reach 1 (SG Confluence to Temple St.)	Coliform Bacteria
	pH
	Total Dissolved Solids
	Toxicity