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Response to Comments
City of Long Beach Integrated Monitoring Program
Los Angeles Water Board
Enclosure 1

Comment No.	IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision	Response
General				
1	Table 1		Table 1 is missing benthic community effects and sediment toxicity which are 303(d) listed impairments. Include benthic community effects for Long Beach Inner Harbor. Sediment toxicity should be added to Long Beach Inner Harbor, Long Beach Outer Harbor, and Eastern San Pedro Bay.	Required impairments added to Table 1.
2	Table 1		Revise Table 1 to include priority pollutants for Los Angeles River Estuary.	Section 8.1, Long Beach Inner Harbor, Outer Harbor, and Eastern San Pedro Bay, of Appendix A-8-1 to the Integrated Monitoring Program (IMP; hereafter referred to as IMP 8.1) to Long Beach Nearshore Watersheds Management Program (WMP) includes Long Beach Inner Harbor, Long Beach Outer Harbor, and Eastern San Pedro Bay waterbodies and a landside area managed and operated by the City of Long Beach Harbor District (Port of Long Beach [Port]) and does not include Los Angeles River Estuary. Los Angeles River Estuary is included in IMP Section 8.2, Lower Long Beach Estuaries and Coastal San Pedro Bay Beaches (hereafter referred to as IMP 8.2).

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3	Section 3.1 and 3.2		Section 3.1 and 3.2 states that “CCMRP monitoring results will be reviewed and incorporated into the IMP annual report by summary and reference only”. Revise sentence to indicate that CCMRP monitoring results and evaluation will be submitted in its entirety with the MS4 Annual Report.	Sentence was edited as commented in Sections 3.1 and 3.2.
4	Section 3.5		Section 3.5 states that “The City has developed mechanisms for tracking information related to new and redevelopment projects...etc.” Specify what these “mechanisms” are.	Section 3.5 was revised to include more details on the new/redevelopment mechanisms such as the Port’s Harbor Development Permit review process and MS4 Front (an online database that the City purchase access in order to track and record City’s activities for MS4 permit compliance).
5	Table 4 (Table 3 of the previous IMP)		Add a footnote to Table 3 specifying the parameters for “field measurements”. These appear to be itemized in sections 8.2.1.1 and 8.3.1.	Footnote 6 was added for the field measurement parameters.
6	Table 4 (Table 3 of the previous IMP)		Correct Table 3 footnote 3 reference “Section 3.3” to “Section 3.4”.	Footnote was changed.
7	Section 5		Complete the incomplete sentence in the last sentence of the 3 rd paragraph: “As specified in the MS4 Permit, if the parameter was not detected in the first event.”	Revised: “As specified in the MS4 Permit, if the parameter was not detected in the first event or if the result is below the lowest applicable water quality objective, it does not need to be analyzed further (MPR, p. E-13).”
8	Table 5 (Table 4 of the previous IMP)		Table 4 shows no TMDL sediment monitoring for CL3-PCB-28. Please provide a rationale.	This was an oversight; CL3-PCB-28 was added for sediment monitoring.

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9	Table 5 (Table 4 of the previous IMP)		In Table 4, fix typographical error “qamma-BHC (lindane)” to “gamma-BHC (lindane)”.	Fixed.
10	Table 5 (Table 4 of the previous IMP)		Add Benzo(g,h,i)perylene to Table 4.	Added to Table 5 with appropriate requirements.
Receiving Water Monitoring				
11	Table 2	Part VI.B.1.c (page E-11)	Proposed receiving water site #19 in Eastern San Pedro Bay is distant from the POLB area in the Compton Creek-Los Angeles River HUC 12 drainage. Sites #18 and 21 are more appropriate to represent potential water quality impacts from MS4 discharges from POLB in this HUC-12 area. Modify proposed receiving water location for the Compton Creek-Los Angeles River HUC-12 area accordingly. Additionally, provide the rationale for selecting receiving water site #16 instead of receiving water site #14 to represent MS4 discharges from the Long Beach Harbor HUC-12 area. (Table 2 & Figure 1)	Site 19 was replaced with Site 18, as commented. Figure 1 and Table 2 were updated accordingly. Site 16, which is one of Harbor Toxics TMDL receiving water compliance points, is located within Long Beach Outer Harbor and inside the breakwater. Site 14 is located within Long Beach Inner Harbor. Hydrodynamic modeling of the Harbor areas indicates that surface currents from the Inner Harbor extend to Site 16 (WRAP 2009 ¹) and water quality at Site 16 will provide more representative data to evaluate the water quality of San Pedro Bay as a whole.

¹ *Port of Los Angeles and Port of Long Beach Water Resources Action Plan. Final Report, August 2009.* Available from: https://www.portoflosangeles.org/DOC/WRAP_Final.pdf.

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12	Section 4.1	Part VI.C.1.b.i (page E-12)	<p>Section 4.1 defines “wet weather storms identified as greater than 0.25-inch precipitation targeting larger rain events that are likely to impact receiving water.” However, the CCMRP states the following: <i>“Depending on the seasonal forecast (e.g., drought vs. wet years), this wet weather event will consist of a storm that produces at least 0.1 inch (0.25 cm) of precipitation per day and separated by an antecedent dry period (less than 0.1 inch [0.25 cm] of rain per day) of at least 72 hours, but consideration will be given to monitor larger storm events (0.5 inch [1.28 cm] or greater) if forecasted.”</i></p> <p>Clarify the difference, if any, between the definition of wet weather to be used in the IMP and that used in the CCMRP.</p>	<p>Section 4.1 was revised to have 0.25 inch of precipitation for the first storm of the season and 0.1 inch of precipitation for the subsequent storm event. This is consistent with the precipitation threshold in both the CCMRP and Section VI. C.1.b of Attachment E to Order No. R4-2014-0024.</p> <p>According to the CCMRP, “The first large storm of the season will be targeted as one of the two wet weather events and will have a predicted rainfall of at least 0.25 inch (0.64 centimeter) with a 70 percent probability of rainfall at least 24 hours prior to the event start time...Depending on the seasonal forecast (e.g., drought vs. wet years), this wet weather event will consist of a storm that produces at least 0.1 inch (0.25 cm) of precipitation per day and separated by an antecedent dry period (less than 0.1 inch [0.25 cm] of rain per day) of at least 72 hours, but consideration will be given to monitor larger storm events (0.5 inch [1.28 cm] or greater) if forecasted.”</p>

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13		Part VII.A (page E-18)	Maps and/or database elements required as per Attachment E Part VII.A of the City of Long Beach MS4 Permit are either unclear or provided as a general map in the WMP. Please include maps and/or database elements specific to this IMP in the revised IMP and provide a table summarizing which elements have been submitted or are pending. For pending elements, provide a schedule for providing the data element.	Submission status and schedule are presented in Table C-1 in Attachment C. Regarding Database Element 11, the Port completed Items a through d via Port's GIS database and Item e will be completed by Dec 28, 2016. The Port would like to seek RWQCB's guidance on how to present the GIS database to demonstrate compliance with Element 11.
14	Table 5 (Table 4 of the previous IMP)		Add benthic community effects and sediment toxicity to Table 4 as required by the Harbor Toxics TMDL. Verify in the revised IMP that receiving water monitoring, stormwater outfall based monitoring, and non-stormwater outfall based monitoring will address all category 1, 2, and 3 parameters.	Footnote 5 was added to Table 5 for benthic community effects and parameter section added for toxicity. Categories 1, 2, and 3 parameters were verified in the revised IMP.
15	Table 5 (Table 4 of the previous IMP), footnote 1	Part VI.C.1.e and VI.D.1.d (page E-13 to E-14)	Table 4 footnote 1 inaccurately states that sampling for constituents in the following year after the 1st year of monitoring depends on meeting the ML. Revise footnote 1 to be consistent with Part VI.C.1.e and VI.D.1.d of Attachment E of the Long Beach MS4 Permit.	Footnote was revised based on Part VI.C.1.e and VI.D.1.d.
16	Section 8.2.1.2		In Section 8.2.1.2, specify the timing of the samples (i.e. x hours after storm event begins).	Language was added to Section 8.2.1.2 to specify sampling.

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17	Section 8.3.2	Part III.F.2 (page E-6)	Section 8.3.2 states that “Grab samples, if necessary, will be collected for parameters not amenable to flow-weighted composite sampling.” Specify at least the categories of parameters non amenable to flow-weighted composite sampling (i.e. pathogen indicator bacteria, oil and grease, cyanide, and volatile organics).	Section 8.3.2 was revised to include “Grab samples will be collected for pathogen indicator bacteria, oil and grease, cyanide, and volatile organics.”
Storm Water Outfall Based Monitoring (Section 3.3)				
18		Part VIII.A.2.b (page E-19)	<p>The draft IMP does not provide sufficient justification on why the chosen stormwater outfall monitoring stations are best representative of land use within the City’s/POLB jurisdiction. 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 stormwater outfall proposed and tabular data. Specifically, the table should include:</p> <ul style="list-style-type: none"> • Land use breakdown (acres and percent) for the entire POLB area • Individual breakdowns for each subwatershed (HUC 12 drainage area) within the POLB area • Individual breakdowns for the catchment area within the POLB that drains to each of the stormwater outfalls 	<p>Section 3.3 was revised by adding land use information for the Port area. Land use maps and tables are in Attachment B for the following:</p> <ul style="list-style-type: none"> • Land use breakdown (acres and percent) for the entire POLB area (Figure B1 and Table B-1) • Individual breakdowns for each subwatershed (HUC 12 drainage area) within the POLB area (Table B-2) • Individual breakdowns for the catchment area within the POLB that drains to each of the stormwater outfalls (Table B-3)

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19		Part VIII.A.2.b (page E-19)	Section 3.3 of the draft IMP states that, the Port of Long Beach proposes to monitor stormwater discharges from two sampling stations, one each from the two HUC-12 equivalent subwatersheds within the Port and representative of Port land uses. It states that the first station (Outfall No. 85) is in Middle Harbor (HUC 180701050402); however, this Outfall appears to be in HUC 180701060701 according to Figure 1. Please clarify or correct.	Figure 1 was revised to clarify that Outfall No. 85 is located within Compton Creek–LA River (HUC 180701050402). Please also see Figure 1-3 in the WMP, which demonstrates that Outfall No. 85 is located within this HUC unit.
20		Part VIII.A.2.a (page E-19)	The draft Watershed Management Program (WMP) Table 1-2 indicates that San Pedro Bay HUC-12 (180701060703) falls within the City’s jurisdiction. If so, the San Pedro Bay HUC-12 should also be addressed by this IMP. Propose a stormwater outfall monitoring location for the San Pedro Bay HUC-12 and add relevant information to relevant sections of the IMP. Alternatively, provide justification for why the other outfall locations are adequately representative of the City’s area in the San Pedro Bay HUC-12.	The IMP 8.1 includes three waterbodies (Long Beach Inner Harbor, Long Beach Outer Harbor, and Eastern San Pedro Bay) and a landside area managed and operated by the Port but excludes a nearshore area to Eastern San Pedro Bay (i.e., San Pedro Bay HUC-12 [180701060703]). Thus, stormwater outfall monitoring for San Pedro Bay HUC-12 is included in the IMP 8.2. The clarification was added in Sections 1 and 3.3.

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21	Section 3.3	Part VI.A.1.b.v (page E-11)	Section 3.3 of the revised IMP should discuss if MS4 discharges are conveyed from the POLB area to any outfalls in eastern San Pedro Bay.	Section 3.3 was revised by adding "There are 224 stormwater outfalls within the Harbor District (the Port). Fifteen of the outfalls on Pier H are not owned and operated by the Port but rather by the City, and they discharge to Los Angeles River Estuary. All 209 stormwater outfalls that are owned and operated by the Port discharge to Long Beach Inner or Outer Harbor, with the exception of five outfalls that discharge to the Los Angeles River Estuary and six outfalls that drain to Eastern San Pedro Bay."
22	Section 6	Part VI.C.1.e and VI.D.1.d (page E-13 to E-14)	<p>Section 6 states that <i>"If a Table E-2 parameter exceeds receiving water criteria in two consecutive surveys, the parameter will be added to the monitoring list of the representative and associated upstream stormwater outfall monitoring site[s] for a minimum of 2 years."</i></p> <p>As per Attachment E Part VI.C.1.e and VI.D.1.d of the City of Long Beach MS4 Permit, if a parameter is detected exceeding the lowest applicable water quality objective, then the parameter shall be analyzed for the remainder of the Order during wet weather at the receiving water monitoring station where it was detected. The same is true for dry weather.</p> <p>Therefore, the statement in Section 6 of the draft</p>	Section 6 was revised from "two consecutive surveys" to "one survey."

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			<p>IMP should be revised from “two consecutive surveys” to “one survey”.</p> <p>Section 6 of the IMP also states that <i>“If monitoring results of a Table E-2 parameter that was added to a stormwater outfall monitoring site indicate the parameter is not detected in excess of the lowest applicable water quality criterion for 2 consecutive years, monitoring of that parameter at the stormwater outfall monitoring site will be discontinued.”</i> The same is proposed for Category 3 pollutants. The revised IMP shall state that a written request to reduce or eliminate the monitoring of specific parameters shall be submitted to the Los Angeles Water Board for Executive Officer Approval.</p>	<p>“A written request to reduce or eliminate the monitoring of specific parameters will be submitted to the RWQCB for Executive Officer Approval” was added in Section 6.</p>
Non-Storm Water Outfall Based Monitoring (Section 3.4)				
23	Section 3.4		<p>Include discussion about non-stormwater discharges to eastern San Pedro Bay in Section 3.4 of the IMP. Is eastern San Pedro Bay also included in the monthly screening that the Port is conducting? If not, outfalls in eastern San Pedro Bay should be screened for non-stormwater discharges.</p>	<p>All outfalls within the Port area discharge to Inner or Outer Long Beach Harbor, with the exception of five outfalls that discharge to the Los Angeles River Estuary and six outfalls that drain to Eastern San Pedro Bay. It should be noted that 15 of these outfalls that are located on Pier H and discharge into the Los Angeles River Estuary are not operated by the Port of Long Beach. As clarified in Comment 20, the San Pedro Bay HUC-12 (180701060703) is covered under the IMP 8.2 and non-stormwater</p>

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				<p>screening for this nearshore area is included in IMP 8.2.</p> <p>All 224 outfalls will be screens as part of the Port’s annual screening process.</p>
24	Section 3.4 and Table 4 (Table 3 of the previous IMP) footnotes 3, 4, and 5	Part IX (Page E-20 to E-25)	<p>Section 3.4 and Table 3 footnote 3, 4, and 5 of the IMP mentions the screening and monitoring of non-stormwater discharge. Please elaborate on the protocols for screening and monitoring including more details on identifying outfalls with significant non-stormwater discharge and prioritized source identification. In addition, the following should also be provided:</p> <ul style="list-style-type: none"> • Follow-up procedures based on the findings of the source identification. • Source identification schedule that ensures that 25% of the outfalls will be addressed by March 28, 2017 and 100% by March 28, 2019. <p>Note that an alternative prioritization and schedule may be proposed if the proposal demonstrates an equivalent level of source investigation and abatement.</p>	<p>Section 3.4 was revised to include more details on the protocols for the screening and the monitoring. Footnotes 3 and 5 were also revised.</p> <p>As proposed in Section 3.4.6, source investigations will be conducted for 100% outfalls determined to have significant non-stormwater discharge by March 28, 2017. More details on the follow-up procedures were also added in Section 3.4.6.</p>
25	Section 3.4	Part IX.B.2 (page E-21 to E-22)	Revise the IMP to include one re-assessment of the non-stormwater outfall-based screening and monitoring program during the term of this Order to determine whether changes or updates are needed.	In Section 3.4.8, the reassessment was added. The Port proposes to conduct the outfall screening and the reassessment of all 224 outfalls annually.

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26	Section 3.4	Part IX.C.1 (page E-22)	The revised IMP shall provide a definition or a criterion on how a significant non-stormwater discharge will be determined. In particular, it should provide specificity on thresholds for field measurements, including flow and water quality data that will be used to determine whether the non-stormwater discharge is significant.	Section 3.4 was revised. Section 3.4.6 includes the definition of significant non-stormwater discharge and describes how the Port will determine the significant non-stormwater discharge during the annual screening.
27	Section 3.4	Part IX.H.1-2 (page E-25)	<p>Specify sampling methods in the revised IMP as follows:</p> <ul style="list-style-type: none"> • Non-stormwater discharges shall be monitored during days when precipitation is < 0.1 inch and those days not less than 3 days after a rain day unless an alternative criterion is proposed. A rain day is defined as those with ≥ 0.1 inch of rain. • Flow-weighted composite samples shall be taken for nonstormwater 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 alternative protocol is proposed. 	Section 3.4 was revised to include the dry-weather definition in Section 3.4.4 and specify the sampling method in Section 3.4.7 (grab sampling). Use of automated samplers or collecting flow-weighted composite samples will not be feasible for this program, due to the number of outfalls observed, land-side access restrictions, and the inability to remain at a single location for an extended period of time because of security concerns.

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28	Section 3.4		<p>During the monthly Port visits to all stormwater outfalls, specify if the Port samples these outfalls if flow is present.</p>	<p>Under the revised MS4 Non-stormwater Discharge Monitoring Program, the Port will no longer conduct monthly visual observations and will instead conduct outfall screening annually (and outfall monitoring quarterly if needed as specified in the permit). During the annual screening of all 224 outfalls, water samples may be collected if necessary to assist further investigation based on the visual observation (such as presence of sheen). Note that not all outfalls are accessible and sampling cannot be safely conducted at certain outfalls because of physical restrictions in outfall locations (e.g., vessel at berth, water-side construction, outfall submerged due to tides). In such instances, a notation will be made on the reporting sheet documenting the obstruction).</p>
29	Table 4	Part IX.G.1-3 (page E-24 to E-25)	<p>Table 3 of the IMP should indicate what parameters will be monitored for non-stormwater outfall-based monitoring (e.g. flow, TMDLs/category 1 pollutants, 303(d) list pollutants/category 2 pollutants, etc.).</p> <p>Additionally, the IMP must propose a monitoring frequency for non-stormwater outfall-based monitoring.</p>	<p>Tables 4 and 5 were revised to include the frequency (four times per year during the dry weather if determined necessary as specified in the Permit) and the parameters for the non-stormwater monitoring.</p>

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Aquatic Toxicity				
30	Section 4.1 and Table 4, footnote 2		Revise the last sentence of Section 4.1 to state that “If all toxicity tests from the three sampling events show no toxicity, the POLB will provide a written request to the Executive Officer of the Los Angeles Water Board to discontinue aquatic toxicity tests the following year.” Also revise Table 3 footnote 2 accordingly.	Revised Section 4.1 to include “If all toxicity tests from the three sampling events show no toxicity, the City will provide a written request to the Executive Officer of the RWQCB to discontinue aquatic toxicity tests for the following year.”
31	Table 4	Part VI.C.1.d.vi and VI.D.1.c.vi (E-13 to E-14)	Table 3 footnote 2 of the draft IMP specifies that <i>“If all toxicity tests from the three sampling events of the first year show no toxicity at a monitoring station, aquatic toxicity tests will not be included in the following year at that monitoring station.”</i> The City of Long Beach MS4 Permit requires aquatic toxicity monitoring every year. Therefore, please remove footnote 2 from Table 3 of the revised IMP.	Footnote 2 to Table 4 was revised to address this comment and the next comment.
32	Table 4	Part VIII.B.1.c.vi (page E-20) and Part IX.G.1.d (page E-25)	Note that aquatic toxicity testing is required for storm water and non-storm water outfall monitoring where the adjacent receiving water monitoring site exhibits toxicity and the TIE conducted on the receiving water is inconclusive. See August 2015 memorandum clarifying aquatic toxicity testing requirements. Clarify in Table 3 that aquatic toxicity testing will be conducted as necessary as a part of stormwater outfall-based monitoring and non-stormwater outfall based monitoring.	Footnote 2 to Table 4 was revised: “Aquatic toxicity testing will be conducted as necessary as a part of stormwater outfall-based monitoring and non-stormwater outfall-based monitoring.”

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33	Sections 7.3 - 7.6		Revise Sections 7.3 – 7.6 of the draft IMP based on the clarification memo issued by the Regional Water Board in August 2015 (attached).	Sections 7.3 to 7.6 were revised based on the memo.
34	Section 7.6		<p>The draft IMP states that <i>“The list of constituents monitored at outfalls identified in the IMP will be modified based on the results of the TIEs. Monitoring for those constituents will occur as soon as feasible following the completion of a successful TIE (i.e., the next monitoring event that is at least 45 days following the toxicity laboratory’s report transmitting the results of a successful TIE).”</i></p> <p>Please revise this statement substituting “45 days following the toxicity laboratory’s report transmitting the results of a successful TIE)” with “45 days following the initial sampling event” consistent with the August 2015 clarification memo.</p>	Section 7.5 (Section 7.6 in the previous IMP) was revised according to the memorandum: the definition of the next monitoring event is according to the memorandum: “the next monitoring event that is at least 45 days following the initial sampling event.”

Enclosure 2

Comment No.	IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision	Response
35	Section 7.1		<p>Sensitive Species Selection: While <i>Ceriodaphnia dubia</i> is frequently the most sensitive species in freshwater receiving waters toxicity testing, in the marine environment the most sensitive species often varies. The Permittee suggests <i>Strongylocentrotus purpuratus</i> is the most sensitive species due to the assumption that metals will be the primary pollutants in both wet and dry weather runoff; however, many pesticides in current use are also known to be present in runoff. Other reasons suggested by the Permittee to justify use of <i>S. purpuratus</i> involve issues of practicality or logistics rather than sensitivity. The three-species screening process described in Part XII.G.3. (Page E-29) of the MRP must be followed at each of the receiving water sites to identify the most sensitive species. We suggest consulting the State Water Resources Control Board 2011 publication, "Implementation Guidance: Toxicity Testing for Stormwater" to gain insight on how to run chronic toxicity tests on marine wet weather samples</p>	<p>Revised text to include three-species screening, as recommended.</p>

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36	Section 7.6		<p>Required Actions Following an Inconclusive TIE: The draft IMP does not state that an inconclusive TIE will be followed by toxicity testing in nearby outfalls as required by the MRP and instead proposes preparing a Discharge Assessment Plan (DAP) in response to an inconclusive TIE. While development of the proposed DAP will be useful, it cannot take the place of the required outfall toxicity monitoring following an inconclusive TIE in the receiving water. The issue of inconclusive toxicity appears confused with persistence of toxicity. Inconclusive TIEs often result from a lack of following well-defined procedures rather than from non-persistent toxicity. As mentioned elsewhere in this comment letter, including pyrethroids in the TIE procedure, as proposed in the draft IMP, will reduce the occurrence of inconclusive TIEs as will including chemical testing for fipronil and its degradates for comparison to U.S. EPA benchmarks. See the memorandum issued by the Los Angeles Water Board on August 07, 2015 for more clarification on toxicity testing and TIE requirements.</p>	<p>Section 7.5 (Section 7.6 in the previous IMP) was revised by adding follow-up actions, including outfall toxicity monitoring, based on the memorandum issued by the Los Angeles Water Board on August 7, 2015. Section 7.5 DAP in the previous IMP was removed.</p>