

Los Angeles Regional Water Quality Control Board

August 5, 2015

Permittees of the Upper Los Angeles River Watershed Management Group¹
(See Distribution List)

APPROVAL, WITH CONDITIONS, OF THE UPPER LOS ANGELES RIVER WATERSHED MANAGEMENT GROUP COORDINATED INTEGRATED MONITORING PROGRAM, PURSUANT TO ATTACHMENT E, PART IV.B OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Permittees of the Upper Los Angeles River Watershed Management Group:

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board) has reviewed the revised monitoring program submitted on April 30, 2015 by the Upper Los Angeles River Watershed Management Group (Group). 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 a coordinated integrated monitoring program (CIMP) 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 Group's revised CIMP and has determined that the CIMP includes 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 Group's draft CIMP. A separate notice of availability regarding the draft CIMPs, including the Group's CIMP, 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 Group's draft CIMP. 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

¹ Permittees of the Upper Los Angeles River Watershed Management Group CIMP include the City of Burbank, City of Calabasas, City of Glendale, City of Hidden Hills, City of La Canada Flintridge, City of Los Angeles, City of Montebello, City of Monterey Park, City of Pasadena, City of Rosemead, City of San Gabriel, City of San Marino, City of South Pasadena, Temple City, City of San Fernando, County of Los Angeles, and Los Angeles County Flood Control District.

Ventura Countywide Stormwater Quality Management Program. During the review of the draft and revised CIMP, the Los Angeles Water Board considered those comments applicable to the Group's proposed CIMP.

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 CIMP. On March 16, 2015, the Los Angeles Water Board sent a letter to the Group detailing the Board's comments on the draft CIMP and identifying the revisions that needed to be addressed prior to the Board's approval of the Group's CIMP. The letter directed the Group to submit a revised CIMP addressing the Los Angeles Water Board's comments. Prior to the Group's submittal of its revised CIMP, the Los Angeles Water Board staff had several email exchanges with the Group's representatives and consultants to discuss the Board's remaining comments and necessary revisions to the draft CIMP. The Group submitted its revised CIMP on June 15, 2015 for Los Angeles Water Board review and approval.

Los Angeles River Nitrogen Compounds TMDL

In March 2005, the County of Los Angeles and the Cities of Los Angeles and Calabasas submitted a Monitoring Work Plan on behalf of MS4 Permittees in the Los Angeles River watershed, which addressed the requirement for MS4 Permittees to submit a Monitoring Work Plan per the Los Angeles River Nitrogen Compounds and Related Effects TMDL (LAR Nitrogen TMDL). For MS4 discharges in the Upper Los Angeles River Watershed, the Group's revised CIMP will now address MS4 monitoring requirements for the LAR Nitrogen TMDL.

The Los Angeles Water Board hereby approves, subject to the following conditions, the Group's June 15, 2015 revised CIMP. 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. Revise the outfall monitoring section to include the rationale for only conducting Suspended-Sediment Concentration analysis at one Receiving Water monitoring site and the corresponding Outfall monitoring site.
2. Revise discussion in Section 2, Receiving Water Monitoring, to remedy inconsistency in text indicating in one sentence that the monitoring program for the LA River Bacteria TMDL is not yet developed (p. 9) and in another that a draft has been developed (p. 10).
3. Provide justification as to why analyses at Receiving Water monitoring sites in the mainstem and tributaries will be conducted for 54 PCB congeners, but analyses at Receiving Water monitoring sites for lakes will only be conducted for 19 PCB congeners.

In separate correspondence to all Permittees developing CIMPs and Integrated Monitoring Programs (IMPs), the Los Angeles Water Board will also be providing 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.

The Group shall submit a final CIMP to the Los Angeles Water Board that satisfies all of the above conditions no later than **August 26, 2015**. Pursuant to Attachment E, Part IV.C.6 of the LA County MS4 Permit, the Group must commence implementing its monitoring program within 90 days after this approval of the final CIMP (i.e. no later than November 3, 2015). However, the Group should also make every effort to be prepared to sample for the first significant storm of the wet season if it should occur prior to November 3, 2015. Please note that the Group is

responsible for complying with all reporting provisions included in Attachment E, Part XIV – XVIII and Section D of Part XIX, “Reporting Requirements for Los Angeles River WMA TMDLs,” and Attachment D, Sections IV, V, and VII.A of the LA County MS4 Permit. The Group is responsible for complying with applicable provisions included in Section C of Part XIX, “Reporting Requirements for Dominguez Channel and Greater Harbor Waters WMA TMDLs.” Finally, the Group is also responsible for complying with the following requirements under Annual Reporting and Adaptive Management.

Annual Reporting

Within the reporting year, through its Annual Report per Attachment E, Part XVIII of the LA County MS4 Permit, the Group shall report on the status of the phased initiation of stormwater outfall monitoring established in the revised CIMP and specified below.

- Section 13 “Schedule for CIMP Implementation”
- The CIMP establishes a phased approach to initiating monitoring at selected stormwater monitoring sites;
 - Phase I of CIMP implementation will commence in October 2015. Phase I receiving water monitoring will consist of **all** monitoring other than wet weather monitoring conducted at the LAR_02_WAS monitoring site due to the need to install an autosampler. Phase I stormwater outfall monitoring will consist of 1) monitoring conducted at LAR_03_SW_COL, RH_SW_ROB, and AS_SW_SEC and 2) the continuation of the autosampler installation process at the remaining monitoring sites.
 - Phase II will commence in October 2016 to allow sufficient time for autosampler installation to be completed as detailed in Figure 6. Phase II (and all subsequent phases) receiving water monitoring will consist of the monitoring conducted during Phase I and the addition of wet weather monitoring conducted at the newly installed LAR_02_WAS monitoring site. Phase II stormwater outfall monitoring will consist of 1) monitoring conducted at LAR_06_SW_OLD, VW_SW_CAN, and TW_SW_BUR and 2) the continuation of the autosampler installation process at the remaining monitoring sites.
 - Phase III will commence in October 2017 to allow sufficient time for the installation of an additional three autosamplers. Phase III (and all subsequent phases) stormwater outfall monitoring will consist of the monitoring conducted during Phase II and the addition of 1) stormwater outfall monitoring at CC_SW_LAN, RH_SW_LER, and BWC_SW_MAI and 2) the continuation of the autosampler installation process at the remaining monitoring sites.
 - Phase IV will commence in October 2018 to allow sufficient time for the installation of the final three autosamplers. Phase IV stormwater outfall monitoring will consist of the monitoring conducted previously and the final three newly installed monitoring sites (LAR_02_SW_MAI, LAR_04_SW_BUE, and LAR_06_SW_WIN).

In addition, 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 group of Permittees shall submit a MAL Action Plan with the Annual Report (first MAL Action Plan due with December 15, 2015 Annual Report) to the Regional 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. Please note that implementation of an approved Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP) per Part VI.C of the LA County MS4 Permit fulfills all requirements related to the development and implementation of the MAL Action Plan, as per Attachment G of the LA County MS4 Permit, for those pollutants addressed by the WMP or EWMP.

Adaptive Management

The Regional 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 Group 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 Regional Water Board Executive Officer, following notice to the Group.

As part of the adaptive management process, any modifications to the CIMP must be submitted to the Los Angeles Water Board for review and approval. The Group must implement any modifications to the CIMP 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 Group's Report of Waste Discharge (ROWD) is due no later than July 1, 2017. To align any modifications to the CIMP proposed through the adaptive management process with permit reissuance, results of the first adaptive management cycle should be submitted in conjunction with the Group's ROWD.

If you have any questions, please contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,



Samuel Unger, P.E.
Executive Officer

Enclosures: Upper Los Angeles River Watershed Management Group Distribution List

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