

Change Sheet: Implementation Plan for the U.S. EPA-Established Malibu Creek Nutrients TMDL and the U.S. EPA-Established Malibu Creek and Lagoon Sedimentation and Nutrients TMDL to Address Benthic Community Impairments

Change	Page	Location	Added or Deleted Text (additions are underlined, deletions are shown in strikeout)	Reason for Change																				
1	11-042 to 11-043 (pg. 3 to 4)	Revised Proposed BPA	<p>The nutrient WLAs in the 2013 TMDL will be incorporated into the Tapia WRF NPDES permit and translated into effluent limitations expressed as <u>concentration-based</u> summer and winter seasonal averages. Compliance with the <u>concentration-based</u> seasonal averages shall be determined by calculating the sum of all nutrient concentration samples collected during the season divided by the number of samples collected during that season.</p> <table border="1"> <thead> <tr> <th>Implementat ion Schedule</th><th>Total Nitrogen Summer WLA</th><th>Total Nitrogen Winter WLA</th><th>Total Phosphor us Summer WLA</th><th>Total Phosphor us Winter WLA</th></tr> </thead> <tbody> <tr> <td>Upon effective date of the Implementation Plan</td><td>Current performance</td><td>Current performance</td><td>Current performance</td><td>Current performance</td></tr> <tr> <td>5 years from effective date of Implementation Plan</td><td>1.0 mg/L</td><td>Current performance</td><td>0.10 mg/L</td><td>Current performance</td></tr> <tr> <td>13.5 years from effective date of Implementation Plan</td><td>1.0 mg/L</td><td>4.0 mg/L¹</td><td>0.10 mg/L</td><td>0.20 mg/L²</td></tr> </tbody> </table>	Implementat ion Schedule	Total Nitrogen Summer WLA	Total Nitrogen Winter WLA	Total Phosphor us Summer WLA	Total Phosphor us Winter WLA	Upon effective date of the Implementation Plan	Current performance	Current performance	Current performance	Current performance	5 years from effective date of Implementation Plan	1.0 mg/L	Current performance	0.10 mg/L	Current performance	13.5 years from effective date of Implementation Plan	1.0 mg/L	4.0 mg/L ¹	0.10 mg/L	0.20 mg/L ²	The 2013 TMDL stated that it may be helpful to determine both concentration and mass-based load reductions. Additional data was given to the Regional Board after the responses to comments were posted that supported calculation of alternative mass-based winter WLAs when the Tapia WRF discharges the excess of 11 MGD to Malibu Creek or its tributaries.
Implementat ion Schedule	Total Nitrogen Summer WLA	Total Nitrogen Winter WLA	Total Phosphor us Summer WLA	Total Phosphor us Winter WLA																				
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			<p><u>1-Concentration-based WLA applies unless, due to a rain event, Tapia WRF discharges the excess of 11 MGD to Malibu Creek or its tributaries and all other discharge options have been exhausted. In that case, the concentration-based WLA does not apply and the mass-based WLA is:</u></p> $\sum_{i=1}^n x_i \times 1.0 \frac{mg}{L} \times 0.35 \times 8.34$ <p><u>x = average flow at gage F-130 during the period of discharge (MGD)</u> <u>i = number of days when Tapia's discharge is greater than 11 MGD</u></p> <p><u>Compliance with the mass-based WLA shall be determined by:</u></p> $\sum_{i=1}^n y_i \times z_i \times 8.34$ <p><u>y = average flow of Tapia's discharge during the period of discharge (MGD)</u> <u>z = total nitrogen concentration in Tapia's discharge (mg/L)</u> <u>i = number of days when Tapia's discharge is greater than 11 MGD</u></p> <p><u>2-Concentration-based WLA applies unless, due to a rain event, Tapia WRF discharges the excess of 11 MGD to Malibu Creek or its tributaries and all other discharge options have been exhausted. In that case, the concentration-based WLA does not apply and the mass-based WLA is:</u></p> $\sum_{i=1}^n x_i \times 0.2 \frac{mg}{L} \times 0.62 \times 8.34$ <p><u>x = average flow at gage F-130 during the period of discharge (MGD)</u> <u>i = number of days when Tapia's discharge is greater than 11 MGD</u></p> <p><u>Compliance with the mass-based WLA shall be determined by:</u></p> $\sum_{i=1}^n y_i \times z_i \times 8.34$ <p><u>y = average flow of Tapia's discharge during the period of discharge (MGD)</u> <u>z = total phosphorus concentration in Tapia's discharge (mg/L)</u> <u>i = number of days when Tapia's discharge is greater than 11 MGD</u></p>	

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Change	Page	Location	Added or Deleted Text (additions are underlined, deletions are shown in strikeout)	Reason for Change
2	11-155 to 11-156 (pg. 15 to 17)	Revised Staff Report	<p>Cut first paragraph on page 11-155 (pg. 15), move to page 11-156 (pg. 16), after Table 8, and revise as follows:</p> <p>The nutrient WLAs will be translated into effluent limitations expressed as <u>concentration-based</u> summer and winter seasonal averages. Compliance with the <u>concentration-based</u> seasonal averages shall be determined by calculating the sum of all nutrient concentration samples collected during the season divided by the number of samples collected during that season. <u>The concentration-based winter seasonal averages do not apply during certain wet-weather events. This is because in order to comply with the winter WLAs, the JPA intends to eliminate the majority of Tapia's discharges to the creek during the winter season by purifying and storing the recycled water for future potable use. The project involves the construction of a 6-MGD advanced treatment facility. The advanced treatment facility, together with existing disposal options such as pumping to the Los Angeles River, will enable the JPA to handle approximately 11 MGD of treated effluent from the Tapia WRF without discharging to Malibu Creek. However, large winter storm events result in substantially higher flows to Tapia and would temporarily require discharges to Malibu Creek. Thus, when the Tapia WRF discharges the excess of 11 MGD to Malibu Creek or its tributaries due to a rain event and all other discharge options have been exhausted, the concentration-based averages do not apply and the mass-based limitation are as follows:</u></p>	To provide the rationale for the alternative mass-based WLA in the staff report. See reason for Change 1

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			<p><u>For total nitrogen:</u></p> $\sum_{i=1}^n x_i \times 1.0 \frac{mg}{L} \times 0.35 \times 8.34$ <p><u>x = average flow at gage F-130 during the period of discharge (MGD)</u> <u>i = number of days when Tapia's discharge is greater than 11 MGD</u></p> <p><u>Compliance with the mass-based limitation for total nitrogen shall be determined by:</u></p> $\sum_{i=1}^n y_i \times z_i \times 8.34$ <p><u>y = average flow of Tapia's discharge during the period of discharge (MGD)</u> <u>z = total nitrogen concentration in Tapia's discharge (mg/L)</u> <u>i = number of days when Tapia's discharge is greater than 11 MGD</u></p> <p><u>For total phosphorus:</u></p> $\sum_{i=1}^n x_i \times 0.2 \frac{mg}{L} \times 0.62 \times 8.34$ <p><u>x = average flow at gage F-130 during the period of discharge (MGD)</u> <u>i = number of days when Tapia's discharge is greater than 11 MGD</u></p> <p><u>Compliance with the mass-based WLA for total phosphorus shall be determined by:</u></p> $\sum_{i=1}^n y_i \times z_i \times 8.34$ <p><u>y = average flow of Tapia's discharge during the period of discharge (MGD)</u> <u>z = total phosphorus concentration in Tapia's discharge (mg/L)</u> <u>i = number of days when Tapia's discharge is greater than 11 MGD</u></p>	

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3	11-044 (pg. 5)	Revised Proposed BPA	<p>The newly interpreted 2003 TMDL nutrient WLAs above Malibou Lake and the 2013 TMDL nutrient WLAs below Malibou Lake shall be achieved by December 28, 2021 for the discharges covered under the Los Angeles County MS4 Permit and within five years of the effective date of the permit renewal for discharges covered under the Ventura County MS4 Permit, but not to exceed 10 years from the effective date of this Implementation Plan. <u>The 2013 TMDL nutrient WLAs below Malibou Lake shall be achieved by December 28, 2023 for the discharges covered under the Los Angeles County MS4 Permit.</u> Interim nutrient WLAs are included based on existing permit requirements.</p> <table><tr><th>Implementation Schedule</th><th>Total Nitrogen Summer</th><th>Total Nitrogen Winter</th><th>Total Phosphorus Summer</th><th>Total Phosphorus Winter</th></tr><tr><td colspan="5">LA County MS4s above Malibou Lake</td></tr><tr><td>December 28, 2017</td><td>8.0 lbs/day*</td><td>8.0 mg/l*</td><td>0.80 lbs/day</td><td>N/A</td></tr><tr><td>December 28, 2021</td><td>1.6 lbs/day*</td><td>8.0 mg/l*</td><td>0.16 lbs/day</td><td>N/A</td></tr><tr><td colspan="5">LA County MS4s below Malibou Lake</td></tr><tr><td>December 28, 2017</td><td>8.0 lbs/day*</td><td>8.0 mg/l*</td><td>0.80 lbs/day</td><td>N/A</td></tr><tr><td>December 28, 2023⁺</td><td>1.0 mg/l**</td><td>4.0 mg/l**</td><td>0.10 mg/l</td><td>0.20 mg/l</td></tr></table>	Implementation Schedule	Total Nitrogen Summer	Total Nitrogen Winter	Total Phosphorus Summer	Total Phosphorus Winter	LA County MS4s above Malibou Lake					December 28, 2017	8.0 lbs/day*	8.0 mg/l*	0.80 lbs/day	N/A	December 28, 2021	1.6 lbs/day*	8.0 mg/l*	0.16 lbs/day	N/A	LA County MS4s below Malibou Lake					December 28, 2017	8.0 lbs/day*	8.0 mg/l*	0.80 lbs/day	N/A	December 28, 2023 ⁺	1.0 mg/l**	4.0 mg/l**	0.10 mg/l	0.20 mg/l	The final compliance date for the 2013 nutrient WLAs assigned to Los Angeles County MS4 permittees below Malibou Lake is extended to 2023 to incorporate the time needed to implement all structural BMPs identified in the Malibu EWMP and any new BMPs that may potentially be needed to meet the 2013 WLAs.
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4	11-060 (pg. 22)	Revised Proposed BPA	<p>Revise Table 7-41.2.</p> <table><tr><th>Task</th><th>Date</th></tr><tr><td colspan="2">Los Angeles County MS4-below Malibou Lake</td></tr><tr><td>Los Angeles County MS4 permittees below Malibou Lake shall attain 2013 nutrient WLAs</td><td>December 28, 2023⁺</td></tr></table>	Task	Date	Los Angeles County MS4-below Malibou Lake		Los Angeles County MS4 permittees below Malibou Lake shall attain 2013 nutrient WLAs	December 28, 2023 ⁺	See reason for Change 3																													
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5	11-158 (pg. 20)	Revised Staff Report	... The Los Angeles County MS4 permittees below Malibou Lake shall meet the 2013 TMDL nutrient WLAs by December 28, 202 1 ³ . They are assigned interim nutrient WLAs based on their current limitations already contained in the Los Angeles County MS4 Permit. The compliance dates for Los Angeles County MS4 Permittees above and below Malibou Lake take into consideration the fact that 98% of all structural BMPs will be installed by July 2021 by the Malibu EWMP Group and that no new BMPs were proposed by the NSMBCW EWMP Group. <u>An additional two years are given to Los Angeles County MS4 permittees below Malibou Lake to implement the remaining 2% of the structural BMPs and any new BMPs that may potentially be needed to meet the 2013 TMDL WLAs.</u> The proposed implementation schedule for the Los Angeles County MS4 storm water permittees is shown in Table 9.	To provide the rationale for extending the final compliance date. See reason for Change 3
6	11-159, 11-168, and 11-183 (pg. 20, 29, and 44)	Revised Staff Report	Revise the compliance dates for Los Angeles County MS4 permittees below Malibou Lake to attain the 2013 nutrient WLAs to December 28, 2023 in Table 9, Table 13, and Table 16.	See Reason for Change 3

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5	11-049 to 11-50 (pg. 11 to 12) and 11-165 to 11-166 (pg. 27 to 28)	Revised Proposed BPA and Revised Staff Report	Lakes	Cooperative Parties	The Ventura County Watershed Protection District does not own or operate any facilities that drain to Malibou Lake, Lindero Lake, or Sherwood Lake. MS4 facilities upstream of these lakes are operated by the Ventura County Transportation Department.
			Malibou Lake	Los Angeles County Los Angeles County Flood Control District Ventura County Ventura County Watershed Protection District City of Agoura Hills City of Westlake Village U.S. National Park Service California Department Parks and Recreation City of Simi Valley Owner/Operator: Malibou Lake Mountain Club, Ltd.	
			Lake Lindero	Los Angeles County Flood Control District Ventura County Ventura County Watershed Protection District City of Thousand Oaks City of Agoura Hills City of Westlake Village City of Simi Valley Owner/Operator: Lake Lindero Homeowners Association	
			Sherwood Lake	Ventura County Ventura County Watershed Protection District U.S. National Park Service Owner/Operator: Sherwood Valley Homeowners Association	