



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
San Francisco, CA 94105

September 8, 2009

Renee Purdy  
Section Chief  
Los Angeles Regional Water Quality Control Board  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013-2343

Dear Renee,

The U.S. Environmental Protection Agency appreciates the opportunity to review the proposed Colorado Lagoon OC pesticides, PCBs, sediment toxicity, PAHs, and metals TMDLs and associated implementation plans. Thank you for your dedication and hard work in developing these TMDLs.

The proposed TMDLs meet all federal regulatory requirements and will be approvable when submitted to the U.S. EPA. We strongly urge the Regional Board to adopt these TMDLs at the next available Regional Board meeting to meet the state adoption requirements under the consent decree (Heal the Bay V. Browner, C. 98-48 25 SBA, March 22, 1999).

Below, we provide comments and request clarification on several items in these TMDLs.

- 1) Section 1.2 defines Colorado Lagoon as a tidally influenced lagoon. However, the TMDLs identify stormwater and air deposition as the only sources. Please provide clarification on whether Colorado Lagoon is considered a salt water, fresh water, or brackish Lagoon. If ocean water is a significant source to Colorado Lagoon, please provide a source load analysis for ocean water.
- 2) Explain how sediment toxicity will be addressed by these TMDLs. Also, please incorporate sediment toxicity monitoring into the implementation plan.
- 3) The McGrath Lake organochlorine pesticides TMDL has water quality criteria values for 4,4'-DDD, 4,4'-DDE, 4,4'-DDT, but not for total DDT. Please make these TMDLs consistent or explain the difference.
- 4) Please give a better description of the amphipod sediment toxicity test described on pages 19-20. In particular, clarify the background concentrations of PAHs, chlordane, PCBs, DDT, zinc, and lead, and the rationale for assigning the pollutants a non-zero

value. Furthermore, please explain in detail the selection of background areas “removed from direct point sources.”

- 5) EDL’s are not used as limits or allocations in these TMDLs. Therefore, it is appropriate to remove all EDL data and references presented in Table 2-5.
- 6) The assumption of a linear relationship between the bioaccumulation factor and sediment concentration is currently acceptable. However, please include plans for re-evaluating this assumption after future monitoring data is collected in Colorado Lagoon and other similar lakes in the Los Angeles watershed.
- 7) Please provide details for identifying the Line N storm drain discharge as insignificant. Also, include Line N in Table 6-2 even if the waste load allocation is zero.
- 8) Section 4.3.2 stated that “no information was available regarding the amount of PAHs that would be directly deposited to the Los Angeles coastal region through dry atmospheric deposition.” Please include additional justification. For instance, was direct deposition an insignificant source in comparison to indirect deposition, which includes stormwater runoff and overland flow in the allocation estimate?
- 9) The interim waste load allocations are set at attaining only 5% of the final WLAs in the first 7 years. As much as possible, please include more detailed interim steps and shorter time frames in meeting the final WLAs in the implementation schedule.
- 10) In reducing pollutant loads in a watershed, it is important to evaluate the impact of one BMP solution on another area, such as transporting pollutant loads to a new location. In these TMDLs, diverting storm drains to Marine Stadium or promoting sedimentation in bioswales appears to only transfer the load instead of reducing the load in the watershed. Please consider the long-term effects of the various BMP actions in the implementation plan. Also, please discuss plans for monitoring Marine Stadium if flows are diverted from Colorado Lagoon to Marine Stadium.
- 11) Please provide a physical description of Marine Stadium.
- 12) Please provide the Regional Board’s plan for assigning implementation responsibility amongst the various landowners.
- 13) Expand upon the fish tissue monitoring plan with details such as species, size, and number of fish analyzed.

These TMDLs state NPDES permitted discharges are not a source in the watershed and have therefore set waste load allocations equal to zero. As recognized in the submittal, if sources currently assigned a load allocation are later determined to be point sources requiring NPDES permits, those load allocations will be treated as wasteload allocations for purposes of determining appropriate water quality based effluent limitations pursuant to 40 CFR 122.44(d)(1).

The Colorado Lagoon OC pesticides, PCBs, sediment toxicity, PAHs, and metals TMDLs appropriately provided numeric targets for water, fish, and sediment and expressed allocations on both a mass and concentration basis, which is consistent with federal regulatory requirements. The implicit margin of safety and the 10% explicit margin of safety appropriately addressed the uncertainties inherent in the TMDLs. U.S. EPA finds the draft Colorado Lagoon OC pesticides, PCBs, sediment toxicity, PAHs, and metals TMDLs have

provided reasonable technical analysis using the best available data, information and scientific tools. In addition, multiple lines of evidence were considered and provided for all proposed TMDLs.

We hope the Regional Board will promptly approve the Colorado Lagoon OC pesticides, PCBs, sediment toxicity, PAHs, and metals TMDLs. If you have any questions concerning these comments, please call me at (213) 244-1803.

Sincerely yours,

Cindy Lin  
Water Division