

General Comments Addressed to EPA or the RWQCB

1. Exxon Mobil (Lial Tischler of Tischler/Kocurek)

1.1 Comment

Sensitivity analyses show relatively extreme changes in concentrations and loadings due to high standard deviation of the measured concentrations. Results of an uncertainty analysis will make it difficult to predict the effectiveness of various controls on runoff. While this result is probably unavoidable, the RB and EPA should start planning how they will address the issue when the model is used to predict TMDL allocations.

1.2 Comment

As with the PAH data, the prediction of upper and lower bound concentrations and loads for DDT, Chlordane, and PCBs show extreme variations using only one standard deviation in the sensitivity analysis. There will be a large uncertainty range in the load predictions that the error in the TMDL loadings will be too high to allow acceptable allocation to different types of land uses.

1.3 Comment

Similar problem as described for wet weather metals. The project team will need to develop an approach to deal with the variability and high levels of uncertainty in the predicted loadings when predicting the loadings for the TMDL.

1.4 Comment

The dry weather concentrations for metals (Table 13) suffer from the same variability problems described above for wet weather metals. Again, the project team will need to develop an approach to deal with the high levels of uncertainty in the predicted loadings when predicting loadings for the TMDL.

1.1 – 1.4 Response—by EPA and LA RWQCB

Comments noted. Preliminary work has been completed on estimates of uncertainties per pollutant. This may be enhanced with additional data forthcoming, specifically the sediment and water results from SCCWRP and POLA/POLB monitoring study in Fall 2006. This item will be discussed in future TAC mtg.

2. Port of Los Angeles

2.1 Comment

The final configuration of the model should be done with an understanding of how the model will be used to develop the TMDLs such that the appropriate parameters and boundary conditions can be set. For example, how will the model be used to set load and waste load allocations? At this point, it seems plausible that the model (once integrated for the entire complex as well as calibrated and verified) could be used to set load and waste load allocations at sources along the boundaries of the model. However, how will load and waste load allocations established at the model boundaries be converted to load and waste load allocations at discharge locations? Moreover, how will this information be used to allocate load and waste load allocations to permittees? The whole process needs to be understood before completing final configuration of the model so all the assumptions can be related to the final results, which, we believe, will be the load and waste load allocations assigned to the permittees.

2.1 Response—by EPA and LA RWQCB

Comment noted. Model development is currently in progress however it is not final. EPA and LA RWQCB will propose more details on use of model output and description of model scenarios prior to final completion of model. This item will be discussed in future TAC mtg.