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GOVERNOR

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SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

November 20, 2014

Ms. Shauna Clark, City Manager
City of La Habra Heights
1245 N. Hacienda Road
La Habra Heights, CA 90631

REVIEW OF THE CITY OF LA HABRA HEIGHTS' INTEGRATED MONITORING PROGRAM, PURSUANT TO PART VI.B AND ATTACHMENT E, PART IV.A OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Ms. Clark:

The Regional Water Board has reviewed the Integrated Monitoring Program submitted on September 15, 2014 by the City of La Habra Heights. This 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, in coordination with an approved Watershed Management Program per Part VI.C, a customized monitoring program 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. Customized monitoring programs may be developed on an individual jurisdictional basis, referred to as an Integrated Monitoring Program (IMP), or a on watershed basis, referred to as a Coordinated Integrated Monitoring Program (CIMP). These programs must be approved by the Executive Officer of the Regional Water Board.

The Regional Water Board has reviewed the City's IMP and has determined that, for the most part, the IMP includes the elements set forth in Part II.E and will achieve the Primary Objectives set forth in Part II.A of Attachment E of the LA County MS4 Permit. However, some additions and revisions to the City's IMP are necessary. The Regional Water Board's comments on the IMP, including detailed information concerning necessary additions and revisions to the IMP, are found in Enclosure 1.

Please make the necessary additions and revisions to the IMP as identified in the enclosures to this letter and submit the revised IMP as soon as possible and no later than **February 18, 2015**. The revised IMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised City of La Habra Heights Integrated Monitoring Program" with a copy to Ivar.Ridgeway@waterboards.ca.gov.

Upon approval of the revised IMP by the Executive Officer, the City must prepare to commence its monitoring program within 30 days. If the necessary revisions are not made, the City must

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER


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comply with the Monitoring and Reporting Program (MRP) and future revisions thereto, in Attachment E of the LA County MS4 Permit.

Until the City's IMP is approved by the Executive Officer, the monitoring requirements pursuant to Order No. 01-182 and Monitoring and Reporting Program CI 6948, and pursuant to approved TMDL monitoring plans shall remain in effect for the City of La Habra Heights.

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:

Enclosure 1 – Summary of Comments and Necessary Revisions to IMP

cc: Joseph Hanna, City of La Habra Heights
Cynthia Gabaldon, CG Resource Management and Engineering

ENCLOSURE 1
SUMMARY OF COMMENTS AND NECESSARY REVISIONS
CITY OF LA HABRA HEIGHTS' INTEGRATED MONITORING PROGRAM (IMP)

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
<i>Receiving Water Monitoring</i>		
Sections 1.4.1, 3.0	General	<p>The City relies upon existing mass emissions stations, S13 on Coyote Creek and S14 in Reach 2 of the San Gabriel River, for its receiving water (RW) monitoring locations. Both of these sites are significantly downstream of the City's MS4 discharges.</p> <p>The City should consider coordinating with adjacent Watershed Management Program (WMP) groups to utilize proposed RW monitoring sites that are located closer to the City's MS4 discharges.</p> <ul style="list-style-type: none"> • For example, the City identifies an existing TMDL monitoring site on the North Fork of Coyote Creek (NFC1), but does not identify it as a RW monitoring location for the City. The Lower SGR WMP group is proposing to use this site; the City should also consider utilizing monitoring data from this site. • Also, the Upper SGR WMP group is proposing a RW site in Reach 1 of San Jose Creek (USGR_SJC_C-1); this site is downstream from the City, but on San Jose Creek to which the City directly discharges.
Section 3.1	TMDL Monitoring	<p>The City does not include receiving water monitoring at the mouth of the San Gabriel River as required by the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL (Harbor Toxics TMDL).</p> <p>MS4 Permittees that are subject to the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL are also responsible for conducting water and sediment monitoring at the mouth of the San Gabriel River to determine the Rivers' contribution to the impairments in the Greater Harbor waters. The monitoring required at the mouth of the San Gabriel River includes:</p> <ul style="list-style-type: none"> • Water Column Monitoring Water samples and total suspended solids samples shall be collected at, at least one site during two wet weather events and one dry weather event each year. The first large storm event of the season shall be included as one of the wet weather monitoring events. Water samples and total suspended solid samples shall be analyzed for metals, DDT, PCBs, and PAHs. Sampling shall be designed to collect sufficient volumes of suspended solids to allow for analysis of the listed pollutants in the bulk sediment.

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		<p>General water chemistry (temperature, dissolved oxygen, pH, and electrical conductivity) and a flow measurement shall be required at each sampling event. General chemistry measurements may be taken in the laboratory immediately following sample collection if auto samplers are used for sample collection or if weather conditions are unsuitable for field measurements.</p> <ul style="list-style-type: none"> • Sediment Monitoring <p>For sediment chemistry, sediment samples shall be collected at, at least one site every two years for analysis of general sediment quality constituents and the full chemical suite as specified in SQO Part 1. All samples shall be collected in accordance with SWAMP protocols.</p> <p>The details including sampling location and all methods must be specified in the City's revisions to its proposed Integrated Monitoring Program.</p> <p>One option is for the City to coordinate with another Watershed Management Program group to meet this requirement. For example, the LACFCD and Lower San Gabriel River WMP is proposing a monitoring location, R8, at the mouth of the San Gabriel River to meet the abovementioned Harbor Toxics TMDL monitoring requirements.</p>
Sections 3.2 and 3.3	Aquatic Toxicity	<p>In Section 3.2, the City indicates that it is not proposing aquatic toxicity monitoring in the receiving water at this time. However, aquatic toxicity monitoring in the receiving water is required two times per year during wet weather conditions and once per year during dry weather conditions, utilizing the critical life stage chronic toxicity test methods listed in Attachment E. (See Attachment E, Parts VI.C.1.d.vi and VI.D.1.c.vi.)</p> <p>To the extent that the City is utilizing data from existing RW monitoring sites such as S13, S14, NFC1 and USGR_SJC_C-1, it may rely upon the aquatic toxicity data from these sites if conducted in accordance with Attachment E, Parts VI.C.1.d.vi and VI.D.1.c.vi. Regardless, the City's IMP must clearly state how the requirement for aquatic toxicity monitoring in the receiving water will be met.</p> <p>The City also references regional SCCWRP efforts (p. 10). If the City intends to rely on these efforts for toxicity monitoring, additional detail is needed in order to evaluate whether these efforts meet the abovementioned requirements of Attachment E.</p>
Section 3.2	Wet Weather Receiving Water	<p>In Section 3.2, the City defines wet weather incorrectly as the period between October 1 and April 15. Instead, wet weather should be</p>

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	Monitoring	<p>defined consistent with the SGR Metals and Selenium TMDL, i.e., when the maximum daily flow in Reach 2 of the SGR is ≥ 260 cfs and in Coyote Creek is ≥ 156 cfs.</p> <p>Similarly, for dry weather, the definition used should be consistent with the TMDL.</p>
Section 3.3		<p>The City is proposing to photograph four key locations along La Mirada Creek on a daily basis (M-F) to document dry weather flows as part of its RW monitoring. The revised IMP should include a map and/or table with these four locations identified with geographic coordinates and descriptions. The revised IMP should also clarify the specific period(s) (e.g., season(s)) and duration (e.g., number of years of permit term) during which the daily photographic documentation will occur.</p>
<i>Outfall Monitoring</i>		
Sections 3.4 and 3.5	Outfall-based Stormwater Monitoring	<p>The City identifies three stormwater outfall locations in Table 3-1. It then identifies two of these three in Table 3-2 "Proposed Stormwater Outfall Monitoring Locations," but only proposes to monitor LHH-1, which discharges to the North Fork of Coyote Creek. The City does not propose outfall monitoring at LHH-2, which discharges to San Jose Creek.¹ However, the City is subject to WQBELs for selenium during dry weather and lead during wet weather for its discharges to San Jose Creek Reach 1.</p> <p>For selenium, the City should document dry weather flows at its proposed LHH-2 outfall site within the San Jose Creek drainage as part of its non-stormwater outfall screening and monitoring, similar to what it proposes to do along La Mirada Creek.</p> <p>If the City intends to rely upon LHH-1 as representative of the City's discharges to San Jose Creek, it would be advisable to conduct monitoring at LHH-2 also during the first year of monitoring and compare the results from the two locations. If they are found to be similar, or results from LHH-1 are more conservative, then the City could present these data and analyses in support of only monitoring at LHH-1.</p> <p>In addition, the City will need to utilize receiving water monitoring data collected in San Jose Creek (for selenium) and San Gabriel River Reach 2 (for lead) to demonstrate compliance. If the receiving water location</p>

¹ The text on pages 15-16 needs clarification. For example, it states, "[t]he City proposes to monitor one outfall location for each of the sub watersheds that it is tributary to instead of the HUC-12 based requirement." But then immediately follows with, "[t]he locations proposed to be monitored by the City only include LHH-1."

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		is exceeding the applicable RWL, then the City may need to monitor at LHH-2.
Section 3.5.1	Outfall-based Stormwater Monitoring – HUC-12 areas and representative-ness	The City states that there are ten HUC-12 areas within the City's boundaries. However, based on Regional Water Board staff analysis, there are three HUC-12 areas within the City – HUCs 18071060502, 18071060602, and 18071060603. Figure 2 of the IMP only delineates two of these areas. (It appears to combine HUCs 18071060602 and 18071060603 into one drainage area.) The text and Figure 2 should be revised to make the necessary corrections and to describe the HUC 18071060603 area and identify and evaluate potential outfall sites in HUC 18071060603. (Note that the 10 drainage areas that the City refers to as HUC-12 areas are smaller subwatershed areas. See attached map, which outlines the three HUC-12 areas in pink and the 10 subwatershed areas in brown.)
Section 3.5.1	Representative-ness of outfall site	The City states that LHH-1 is representative of the City's land uses; however, the revised IMP must present tabular data to support this statement. Specifically, the table should include (i) land use breakdown (acres and percent) for the entire City, (ii) individual breakdowns for the portion of the City within the Coyote Creek subwatershed and the San Jose Creek subwatershed, and finally (iii) the individual breakdown for the area within the City that drains to LHH-1.
Section 3.5	Storm Drains, Channels and Outfalls Map and/or Database	<p>The City provides several maps associated with its IMP; however, not all required information pursuant to Attachment E, Part VII.A is clearly provided. The revised IMP should include the following:</p> <ol style="list-style-type: none"> 1) Revised Figures 2 and 5 with surface waterbodies within the City's jurisdiction clearly labeled with names 2) The location and length of all open channels (and underground pipes 18 inches in diameter or greater, if any) 3) The location of LHH-3 on Figure 5 4) Revised Figure 5 that includes a delineation of the specific drainage areas associated with LHH1 and LHH2 <p>Additionally, detailed information on the source of the spatial data used on the maps should be identified in the IMP (e.g., agency that produced the data, year data were compiled/produced/updated, etc.) and, if possible, the GIS layers and project file(s) should be provided on CD or DVD. The City references in several places an "inventory" of its MS4; if this inventory is available as a database or in a GIS file, it should be provided as supporting documentation for the City's IMP.</p>
Section 3.5.3	Analytical Procedures	The City notes that sampling and analysis shall be conducted by a consulting laboratory that can meet required pollutant detection limits and that sample analysis shall be conducted in accordance with EPA established or Regional Water Board accepted methods applicable to the pollutant(s) being analyzed.

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		<p>Note that for mercury, Method 245.7 or 1631E should be utilized (not 245.1) to get sufficiently sensitive minimum levels for analytical results to be compared with the water quality objective.</p> <p>Monitoring for PCBs in sediment or water should be reported as the summation of aroclors and a minimum of 40 (and preferably at least 50) congeners. See Table C8 in the state's Surface Water Ambient Monitoring Program's Quality Assurance Program Plan (Page 72 of Appendix C), which can be downloaded at http://www.waterboards.ca.gov/water_issues/programs/swamp/docs/qapp/qapprp082209.pdf for guidance. It is preferable samples be analyzed using EPA Methods 8270 or 1668C (as appropriate), and High Resolution Mass Spectrometry.</p> <p>The Regional Water Board also recommends that the City conduct sampling for Suspended-Sediment Concentration (SSC) in addition to TSS.</p>
Section 3.4	Non-Stormwater Outfall Based Monitoring	<p>The revised IMP must include a process for creating, and updating annually, a database and map of outfalls that have been identified as having significant non-stormwater discharges.</p> <p>The revised IMP must include a process for reassessing the Outfall Screening and Monitoring Plan within the current permit term pursuant to Attachment E, Part IX.B.2.</p>
Section 3.4.1	Non-Stormwater Screening process and identifying "significant" non-stormwater discharges	<p>The revised IMP needs to clarify the initial screening process by providing a definition of "dry season" (during which the initial stage of screening will take place) and providing additional clarity on when the two additional visits would occur for outfalls where dry weather flow is considered to be significant (i.e., during the following "dry season").</p> <p>The revised IMP should clearly define how the City will determine what constitutes a "significant non-stormwater discharge" (e.g., flow threshold) pursuant to Attachment E, Part IX.C.1.a-e.</p>
Section 3.4.1	Outfall prioritization for non-stormwater discharges	<p>The IMP includes a prioritization approach consistent with Attachment E, Part IX.E.1 on page 18. The revised IMP should further clarify the Tier 2 prioritization on the basis of the implementation schedule set forth in the SGR Metals TML Implementation Plan adopted by the Regional Water Board, which became effective on October 13, 2014. See http://63.199.216.6/larwqcb_new/bpa/docs/R13-004/R13-004_RB_BPA.pdf</p>
Section 3.4.2	Source identification for	<p>The IMP includes a schedule for conducting source identification associated with non-stormwater discharges consistent with</p>

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	outfalls with significant Non-stormwater discharges	Attachment E, but the effective date of the permit is incorrectly stated as December 28, 2013. The correct date is December 28, 2012.
Section 3.4.2	Monitoring of significant non-stormwater discharges	The revised IMP needs to provide clarification on how "indicator parameters" (p. 19) will be chosen for monitoring of non-stormwater discharges. Standard parameters identified in Attachment E, Part IX.G must be included along with other parameters selected on the basis of the field inspections and desktop studies, where appropriate.
<i>General Comments</i>		
Section 2.0	TMDL requirements	The text on page 8 and Table 2-1 need to be revised to include pollutants addressed by the Harbors Toxics TMDL as Category 1 pollutants (see Attachment N of the LA County MS4 Permit).
Section 2.0	TMDL requirements	<p>Table 2-2 needs to be revised to include the WQBEL for lead in Reach 2 of the San Gabriel River, which applies to all upstream reaches and tributaries, including San Jose Creek Reach 1 to which the City discharges.</p> <p>It should also be clarified that the mass-based WQBELs presented in Table 2-2 are shared among all MS4 Permittees discharging to that waterbody or reach.</p>
Section 2.0	TMDL requirements	The text on page 9 should be updated to include the interim milestones and implementation schedule for the WLAs assigned to MS4 discharges in the SGR Metals TMDL. The Regional Water Board adopted an implementation plan for this USEPA established TMDL, and the implementation plan became effective on October 13, 2014. See link above.
Section 2.0	Applicable beneficial uses and water quality objectives	<p>The Basin Plan water quality objective for indicator bacteria, listed in Table 2-3 is incorrect. All the waterbodies listed in Table 2-3 have Water Contact Recreation (REC-1) as a Potential beneficial use and, therefore, the applicable water quality objectives are 235 <i>E. coli</i> per 100 mL as a single sample maximum objective, and 126 <i>E. coli</i> per 100 mL as a geometric mean of a statistically sufficient number of samples (generally at least 5 over a 30-day period).</p> <p>For beneficial use designations of waterbodies, see: http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/electronics_documents/BeneficialUseTables.pdf</p> <p>For applicable water quality objectives, see: http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/BasinPlanUpdate3Chapt3/Revised%20Chapter%203%20Text_Track%20Changes_050113.pdf</p> <p>The waterbodies are subject to a high flow suspension of these REC-1 bacteria objectives during precipitation events of greater than or equal</p>

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		to ½ inch and the 24 hours following the precipitation event.
Section 3.1	TMDL requirements	<p>The text on page 12 regarding TMDL monitoring needs to be revised to reflect the recently established SGR Metals TMDL Implementation Plan, which was adopted by the Regional Water Board and became effective on October 13, 2014. This implementation plan establishes an implementation schedule for complying with the wet- and dry-weather WLAs assigned to MS4 discharges, including those of the City.</p> <p>The text on page 12 also needs to be revised to state that, "TMDL WLAs <u>to which the City's MS4 discharges are subject</u> have been established for San Jose Creek Reach 1, <u>Coyote Creek, and Reach 2 of the San Gabriel River</u>. <u>WLAs for Reach 2 of the San Gabriel River apply to all upstream reaches and tributaries, including San Jose Creek Reach 1 to which the City's MS4 discharges.</u>"</p>