

Department of Water and Power



the City of Los Angeles

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August 15, 2006

Ms. Song Her
Clerk to the Board, Executive Office
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812-0100



Dear Ms. Her:

Subject: Comment Letter – COP Model Monitoring

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to comment on the State Board's proposed changes to Appendix III of the California Ocean Plan. Please see our comments enclosed herewith.

If you have any questions, please contact Mr. Bob Krivak at (213) 367-1339.

Sincerely,

Susan M. Damron
Manager of Wastewater Quality Compliance

BK: bdc
Enclosure
c/enc: Mr. Bob Krivak

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Los Angeles Department of Water and Power

Comments on California Ocean Plan (Appendix III)

1. Effluent Monitoring, Bacteria – Non-Storm Water Point Sources (p. 1)

Non-storm water point sources discharging greater than 10 MGD, or within one nautical mile of shore... monitoring for all Ocean Plan indicator bacteria, shall be required at least five days per week.

LADWP believes that the requirement to monitor for indicator bacteria should not be applied to all dischargers; it is more appropriate for POTWs, and perhaps power plants that commingle sanitary waste with their once-through cooling water discharges. However, even in the latter case the determination should be made on a case-by-case review, since the sanitary waste volume is insignificant as compared to the once-through cooling water volume. Power plants that do not discharge sanitary waste should be exempt from this requirement.

LADWP strongly recommends that if there is no reasonable potential for bacteria to be present in a particular discharge, or if detected at a concentration that is below the corresponding water quality objective, the discharge should not be subject to the proposed bacterial monitoring requirement. Furthermore, since the renewal applications only require fecal coliform data, a facility may be required to collect a limited number of samples of the influent/effluent and analyze for the remaining indicator bacteria, i.e., *Escherichia coli* and *Enterococci* to establish their absence. Therefore, if a facility does not add a sanitary waste component to the outfall, nor has historical evidence of a problem, e.g. through review of the data submittals accompanying the 5-year NPDES permit renewal applications, then the facility in question should be exempt from this monitoring requirement.

In addition, the minimum bacterial monitoring frequency of five days per week is excessive. For facilities that have either shown no reasonable potential, or if the indicator bacteria are found at concentrations below or near the water quality objectives, a reduced frequency, such as quarterly, semi-annually, or annually should be considered. LADWP believes that the five day per week sampling requirement should only apply to problematic facilities that consistently discharge the indicator bacteria in concentrations that may degrade the environment.

2. Effluent Monitoring, Bacteria – Permitted Storm Water Point Sources (p. 2)

LADWP interprets that this monitoring requirement applies only to actual storm water outfalls, such as those covered under the MS4 program, and does not apply to storm water collection within an industrial site, e.g., a power plant that commingles low volume wastes (containing storm water) and once-through cooling water before being discharged through a once-through cooling water

outfall. If this interpretation is correct, LADWP recommends that language be included to eliminate all ambiguity, e.g. by specifying that this requirement applies to storm water discharges from MS4-permitted discharges only.

3. Effluent Monitoring, Table B – Non-Storm Water Point Sources (p. 2)

The proposed changes to Appendix III require facilities with discharges greater than 10 MGD to monitor the substances in Table B at least semiannually.

LADWP believes the requirement to monitor the entire Table B list semiannually is excessive and unwarranted. Monitoring results submitted with the previous 5-year NPDES permit renewal applications have shown that nearly all of the priority pollutants are recorded as "Not Detected". For example, none of the Table B carcinogen and non-carcinogen chemicals, as well as phenolics and chlorinated phenolics, are being added by LADWP's power plant, and those that were detected were below the water quality objectives. In fact, monitoring data submitted with LADWP's last NPDES renewal application indicated that of the Table B chemicals, only three metals (copper, nickel, zinc) and a single sample containing aldrin were detected in concentrations above their water quality objectives.

Therefore, LADWP believes that rather than requiring analysis for the entire Table B chemical list, only those chemicals with a reasonable potential to be present should be analyzed on a semiannual basis; a scan of chemicals not reasonably expected to be present should be required only once during the permit renewal cycle.

4. Effluent Monitoring, Table B – Permitted Storm Water Point Sources (p. 2)

Unlike the proposed changes to Table B monitoring of non-storm water point sources, the changes to this section specify "for industrial storm water discharges all outfalls must be monitored during each (emphasis added) storm event for Table A parameters." LADWP is in agreement with the proposed monitoring as long as it is simply a monitoring and reporting program without effluent limits. In addition, there are no clarifications provided for what is a storm event, or under what circumstances may sample collection be exempt or delayed. Storm water monitoring program language contained in earlier LADWP facility permits, although designed with requirements of the General Industrial Activities Storm Water Permit in mind, included the following language: "During periods of extended rainfall, no more than one sample per week need to be taken. Sampling shall be during the first hour of discharge. If, for safety reasons, a sample cannot be obtained during the first hour of discharge, a sample shall be obtained at the first safe opportunity, and the reason for the delay shall be included in the report." LADWP requests similar language.

Also, since these facilities may not be staffed with personnel trained in sample collection during off-shifts, weekends, and/or holidays, language should be included that states samples shall be collected as soon as possible allowing for these constraints. Finally, rather than monitoring each storm event, language should be included that addresses the following, i.e., if the storm event is a small rain event that does not result in a discharge, or is less than a certain accumulation (say $\frac{1}{4}$ - $\frac{1}{2}$ an inch). LADWP believes that if multiple storm events occur during a particular week, the once per week sample collection language provided in the above paragraph is sufficient to provide meaningful storm water data without being unreasonably burdensome.