BPA Change Sheet
Los Angeles River Nitrogen TMDL
July 10, 2003

Document	Page No.	Description of Change and Justification
• Finding No. 4 • Problem Statement	13-92 13-97	Toxicity and low dissolved oxygen were removed from the list of related effects impairing the beneficial uses of the Los Angeles River since the 2002 303(d) list does not contain listings for toxicity and low dissolved oxygen for Los Angeles River Watershed.
• Waste Load Allocations (for point sources)	13-98	Waste load allocations (WLAs) for major point sources were revised to include 10% margin of safety (MOS) for ammonia and reduce MOS for nitrate, nitrite, nitrate + nitrite from 20% to 10%. The changes were made based on additional linkage analysis recently performed by the U.S. EPA that shows the N/DN scenarios discussed in the TMDL will implement the numeric objectives at greater loads of nitrate discharged from the POTWs. The Regional Board will consider the WER report and a site specific objective for ammonia no later than 3.5 years from the effective date of the TMDL. The revised WLAs ammonia, nitrate, nitrite and nitrate + nitrite are provided below. To be consistent with the numeric target, the revised WLAs for nitrate, nitrite, and nitrate + nitrite are represented as 30-day average. a) Total ammonia as nitrogen (NH_3-N): ***POTW*** ***One-hour average WLA*** ***Thirty-day average WLA*** Donald C. Tillman WRP 4.2 mg/L 1.4 mg/L Los Angeles-Glendale WRP 7.8 mg/L 2.2 mg/L Burbank WRP 9.1 mg/L 2.1 mg/L b) Nitrate-nitrogen (NO_3-N), nitrite-nitrogen (NO_2-N), and Nitrate-nitrogen plus nitrite-nitrogen (NO_3-N + NO_2-N): ***Constituent*** ***Thirty-day average WLA**** NO_3-N 7.2 mg/L NO_2-N 0.9 mg/L

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		NO_3-N + NO_2-N 7.2 mg/L *Receiving water monitoring is required on a weekly basis to ensure compliance with the water quality objective.
Implementation, Item 2	13-100	The tentative Basin Plan amendment has been revised to include interim limits based on current performance for ammonia to preclude increases in the discharge of ammonia, and interim limit for nitrate + nitrite is set equal to water quality objective to be protective for these constituents in interim period. The following interim limits will apply to NH_3-N, and NO_3-N + NO_2-N for a period not to exceed three years from the effective date of the TMDL. Effluent limits for the individual compounds NO_3-N, and NO_2-N are not required during the interim period. ***Interim Limits for NH_3-N and NO_3-N + NO_2-N*** ***Total ammonia as Nitrogen*** ***POTW*** ***Daily Maximum**** ***Monthly Average**** Donald C. Tillman WRP 21.7 mg/L 21.0 mg/L Los Angeles-Glendale WRP 19.4 mg/L 16.5 mg/L Burbank WRP 24.1 mg/L 22.7 mg/L *The monthly average and daily maximum interim limits are based on the 95th and 99th percentiles of effluent performance data reported by dischargers. ***Nitrite-nitrogen + Nitrate-nitrogen*** ***Monthly Average*** 8.0 mg/L
Margin of Safety	13-100	An explicit margin of safety of 10% is included for ammonia, and 20% MOS for nitrate, nitrite and nitrate + nitrite loads are reduced to 10%. The revisions are made based on the recent linkage analysis performed by the U.S. EPA that shows the N/DN scenarios discussed in the TMDL will implement the numeric objectives at greater loads of nitrate discharged from the POTWs.
Implementation Schedule	13-102	• Task 4, 5, and 8 of Implementation Schedule are revised as follow to provide clarification:

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		∗ Task 4 is changed to read: "Submittal of a Monitoring Work Plan by MS4 permittees to estimate ammonia and nitrogen loadings associated with runoff loads from the storm drain system for approval by the Executive Officer of the Regional Board. The Work Plan will include monitoring for ammonia, nitrate, and nitrite. The Work Plan may include a phased approach wherein the first phase is based on monitoring from the existing mass emission station in the Los Angeles River. The results will be used to calibrate the linkage analysis. The Work Plan will also contain protocol and a schedule for implementing additional monitoring if necessary. The Work Plan will also propose triggers for conducting source identification and implementing BMPs, if necessary. Source identification and BMPs will be in accordance with the requirements of MS4 permits." ∗ The last sentence of task 5 "Flow and analytical data for nutrients will be required to estimate loadings from non-point sources" is replaced by "The Workplan will include protocol and schedule for development of appropriate numeric targets for nutrients and algae in the Los Angeles River. The Workplan will also contain protocol and a schedule for identification of limiting nutrients." ∗ The following language is added to the end of Task 8: "The site specific objective will consider factors including but not limited to seasonality, averaging periods, and the WER for ammonia. If a site specific objective is adopted by the Regional Board, approved by State Board and Office of Administrative Law and established by US EPA, for ammonia then the WQO are revised and as such the numeric target and waste load allocations would need to be revised to reflect the revised WQO. • Completion date for Task 7 was changed form 2.5 years to no later than 2.5 years after Effective Date of TMDL based on recent information provided by the dischargers stating that the studies will be completed sooner than proposed. • Completion dates for Tasks 8 and 9 are also changed from 3 years to 3.5 years.