

## Los Angeles Regional Water Quality Control Board

January 25, 2019

Robert Kress  
Senior Vice President  
Lubricating Specialties Company  
8015 Paramount Boulevard  
Pico Rivera, CA 90660

Dear Mr. Kress:

### **COMMENTS ON THE DRAFT MONITORING AND REPORTING PLAN AND QUALITY ASSURANCE PROJECT PLAN – LUBRICATING SPECIALTIES COMPANY, PICO RIVERA FACILITY, PICO RIVERA, CALIFORNIA (NPDES NO. CA0059013)**

Thank you for your submittal on November 30, 2018, transmitting a Draft Monitoring and Reporting Plan (MRP) and Quality Assurance Project Plan (QAPP) (collectively, the Draft Plans) to the Los Angeles Regional Water Quality Control Board (Regional Water Board). The Draft Plans were submitted per requirements of the waste discharge requirements (WDRs) and National Pollutant Discharge Elimination System (NPDES) permit adopted through Order No. R4-2017-0190 (Order) for the subject Facility. Section VI.C.2.b of the Limitations and Discharge Requirements of Order No. R4-2017-0190 requires the Discharger to implement a Compliance Monitoring Program above the Los Angeles River Estuary in accordance with the *Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants Total Maximum Daily Load* (Harbors Toxics TMDL), which was incorporated into the *Water Quality Control Plan for the Los Angeles Region* (Basin Plan) through Resolution No. R11-008. The Regional Water Board reviewed the Draft Plans and provides the following comments:

1. MRP, List of Abbreviations. (Pg. ii) For the acronym MDL, correct “Method of Detection Limit” to “Method Detection Limit”. Make this correction throughout the MRP and the QAPP.
2. MRP, List of Abbreviations. (Pg. ii) For the acronym NPDES, correct “National Discharge Elimination System” to “National Pollutant Discharge Elimination System”. Make this correction throughout the MRP and the QAPP.
3. MRP, List of Abbreviations. (Pg. ii) For the acronym TMDL, correct “Total Mass Daily Load” to “Total Maximum Daily Load”. Make this correction throughout the MRP and the QAPP.

4. MRP, Section 2.4. Facility Discharge. (Pg. 3) Modify references to the Facility's NPDES permitted discharge point from "ES-001" to "EFF-001" such that it is consistent with the Order.
5. MRP, Section 2.4. Facility Discharge. (Pg. 4) Revise the monitoring location for the Harbors Toxics TMDL Compliance Monitoring Program. In accordance with Pg. 27 of Attachment A to Resolution R11-008 and based on consultation with TMDL staff, the Discharger shall conduct water column, total suspended solids (TSS), and sediment monitoring from at least one site above and as close as possible to the Los Angeles River Estuary to satisfy the Harbors Toxics TMDL Compliance Monitoring Program requirement. The proposed monitoring locations RSW-001 and RSW-002, which are located at Rio Hondo Reach 2, are too far upstream from the Los Angeles River Estuary and are not appropriate. The Harbors Toxics TMDL Compliance Monitoring requirement is in addition to and different from the receiving water monitoring requirements at the Receiving Water Monitoring Locations RSW-001 and RSW-002 that are included in sections VIII.A and VIII.B of Attachment E (Monitoring and Reporting Program (MRP)) of the Order.
6. MRP, Figure 1. Location Map. (Pg. 5) Indicate on the map the approximate location at which the Facility's discharge reaches Rio Hondo Reach 2.
7. MRP, Section 3. TMDL Monitoring: Correct the subsection numbers in Section 3; they are currently out of sequence.
8. MRP, Section 3.2. MRP Implementation. (Pg. 7)
  - Modify references to the Facility's NPDES permitted discharge point from "ES-001" to "EFF-001". See Comment 4.
  - Revise the sample location for the Harbors Toxics TMDL Compliance Monitoring. See Comment 5.
9. MRP, Section 3.1. Water Column and TSS Monitoring. (Pg. 7)
  - Revise the sample location for the Harbors Toxics TMDL Compliance Monitoring. See Comment 5.
  - Define dry and wet weather events. Since the Facility discharges to Rio Hondo Reach 2, the dry and wet weather conditions to be used in the Compliance Monitoring Program shall be consistent with the dry and wet weather conditions for Rio Hondo Reach 2 included in the Order and consistent with the *Los Angeles Rivers and Tributaries Metals Total Maximum Daily Load* (Los Angeles River Metals TMDL), which was adopted into the Basin Plan through Resolution No. R05-006, and its subsequent amendments.
10. MRP, Section 3.1. Water Column and TSS Monitoring. (Pg. 8) Change the reference to Table 2 from "waste load allocations (WLAs)" to "water column targets" such that the language is consistent with the Harbors Toxics TMDL. The Harbors Toxics TMDL did not include WLAs for the Los Angeles River Estuary.
11. MRP, Section 3.2. Sediment Monitoring (Pg. 8)
  - Revise monitoring location. See Comment 5.

- In accordance with Pg. 27 of Attachment A to Resolution No. R11-008, sediment monitoring requirements for the Los Angeles River responsible parties consist of analyses of general sediment quality constituents and the full chemical suite as specified in the *Water Quality Control Plan for Enclosed Bays and Estuaries – Part 1 Sediment Quality* (SQO Part 1). Attachment A of SQO Part 1 includes a list of general sediment quality constituents and the full chemical suite that was referenced on Pg. 27 of Attachment A to Resolution No. R11-008. Sediment triad sampling with the three lines of evidence approach (including the analyses of the full chemical suite, two toxicity tests, and four benthic indices as specified in SQO Part 1) as currently proposed in the MRP is not required for the Los Angeles River responsible parties. However, the Discharger may choose to conduct monitoring in addition to the required analyses listed on Attachment A of the SQO Part 1. Please confirm that the Discharger proposes to conduct sediment triad sampling with the three lines of evidence approach, or modify the MRP accordingly.
12. MRP. Figure 3. Monitoring Locations (Pg. 10) Revise the Figure to indicate the approximate location(s) where the Discharger proposes to conduct monitoring for the Harbors Toxics TMDL Compliance Monitoring Program, at a location above and as close as possible to the Los Angeles River Estuary. See Comment 5.
13. MRP. Table 1. Monitoring Locations and Parameters. (Pg. 11) Modify this table incorporating the above comments, including information listed for: waterbody, Station ID, station description, station location, and sample media and parameters (for sediment).
14. MRP. Table 2. Water Column Concentration Based Waste Load Allocations and Sediment Targets. (Pg. 12)
- Revise the title for Table 2 to “Concentration-Based Water Column Targets and Sediment Targets”. Keep consistent throughout the whole document.
  - Revise the column heading for the “Water Column Targets” table from “Waste Load Allocations” to “Targets”, so it is consistent with Attachment A to Resolution No. R11-008.
  - Revise the water column targets. The targets included for the listed parameters shall be consistent with the corresponding acute or chronic aquatic life saltwater criteria or the human health criteria, whichever is more stringent, listed on Pg. 3 of Attachment A to Resolution No. R11-008.
  - Revise the sediment target listed for copper; the value listed currently (3.4 mg/kg) is inconsistent with the target for copper listed on Pg. 4 of Attachment A to Resolution No. R11-008 (34 mg/kg).
  - Include the correct units for the organic compounds under the “Sediment Targets” table. The table presents all marine sediment targets in units of “mg/kg”; however, Pg. 4 of Attachment A to Resolution No. R11-008 includes marine sediment targets for organic compounds in units of “µg/kg” and have the same values as those presented here. Please reconcile.
  - Revise the sediment target listed for benzo(a)anthracene (with the correct unit, see the bullet point above); the value listed currently (251) is inconsistent with the target for benzo(a)anthracene listed on Pg. 4 of Attachment A to Resolution No. R11-008 (261).
  - Correct spelling for chlordane, total.

15. MRP. Section 4. Reporting. (Pg. 13)
  - Revise the first sentence to read: "An Annual Report shall be submitted to the LARWQCB documenting efforts the Facility has made to comply with the requirements included in Order No. R4-2017-0190, and applicable water column and sediment targets included in the Harbors Toxics TMDL in samples taken above the Los Angeles River Estuary."
  - Revise the name of the receiving water for the Facility's discharge in the second paragraph from "Rio Hondo Reach 2 Estuary" to "Rio Hondo Reach 2".
16. QAPP. Section 2.2. Facility's Responsibility. (Pg. 3) Revise water column, TSS, and sediment sample location. See Comment 5.
17. QAPP. Section 3.2. Sampling Location and Parameters. (Pg. 5)
  - Revise monitoring location. See Comment 5.
  - Revise the last sentence to: "Table 2 summarizes the water column and sediment targets included in the Harbors Toxics TMDL that are applicable to the Los Angeles River Estuary."
18. QAPP. Section 3.5.1. Water Column and TSS Sample. (Pg. 6)
  - Define dry and wet weather events. See second bullet point for Comment 9.
  - Revise monitoring location. See Comment 5.
19. QAPP. Section 3.5.2. Sediment Sample. (Pg. 7) Revise monitoring location. See Comment 5.
20. QAPP. Figure 1. Monitoring Locations. (Pg. 12) Revise the Figure to indicate the approximate location(s) where the Discharger proposes to conduct monitoring for the Harbors Toxics TMDL Compliance Monitoring Program, at a location above and as close as possible to the Los Angeles River Estuary. See Comment 5
21. QAPP. Table 1. Monitoring Locations and Parameters. (Pg. 13) Revise in accordance with Comment 13.
22. QAPP. Table 2. Water Column Concentration Based Waste Load Allocations and Sediment Targets. (Pg. 14) Revise in accordance with Comment 14.
23. QAPP. Section 5. Documentation and Records. (Pg. 18) Reporting for laboratory personnel shall include both date and time at which analyses were performed.
24. QAPP. Section 6. Reference. (Pg. 20). Include a copy of the documents listed in the Reference section with the MRP and QAPP package, so they are easily accessible to Facility staff/ sampling personnel.
25. Appendix A. Chain of Custody.
  - Revise Sample ID based on correct sample location (See Comment 5 regarding selection of sampling location).
  - Indicate clearly that analyses for both the water sample and the TSS sample are required for the water column monitoring. Indicate clearly the analyses to be

conducted on the TSS sample (for example, include a separate Sample ID for analyses to be conducted on the TSS sample).

- Include analysis of percent fines for sediment samples.
- List or reference a list of the individual parameters required to be tested in the sediment samples for metals, PAHs, pesticides, and PCBs.

26. Appendix C. Analytical Methods, Reporting Limits and Method Detection Levels, Sediment Analysis. Include percent fines for sediment analysis.

27. Appendix D. Field Collection Data Sheet.

- For the "Purpose" section, remove the "Fish Tissue" option. No fish tissue monitoring is required.
- For the "Field Measurement" section, electrical conductivity shall be measured instead of salinity to be consistent with Attachment A to Resolution No. R11-008.

Please modify the Draft Plans in accordance with the comments included herewith and submit a revision by **February 25, 2019**. The revised Draft Plans will be posted on the Regional Water Board's website for a 30-day public comment period. The Regional Water Board will provide further instructions on the implementation of the revised Draft Plans depending on whether substantial comments are received.

If you have any questions, please contact Ching Yin To at [Ching-Yin.To@waterboards.ca.gov](mailto:Ching-Yin.To@waterboards.ca.gov) or at (213) 576-6696.

Sincerely,

  
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Deborah J. Smith  
Executive Officer

cc: **(Via Email Only)**

Mr. Mark Negast, Lubricating Specialties Company  
Mr. Harvey Lopez, Lubricating Specialties Company  
Mr. Weyman Kam, CET Engineering, Inc.