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Los Angeles Regional Water Quality Control Board

February 26, 2018

Stephen Defibaugh
Project Manager, Environmental Remediation
SFPP, L.P.
1100 Town and Country Road, 7th Floor,
Orange, CA 92868

Dear Mr. Defibaugh:

COMMENTS ON THE DRAFT MONITORING PLAN AND QUALITY ASSURANCE PROJECT PLAN – SFPP, L.P., SFPP NORWALK PUMP STATION, NORWALK, CALIFORNIA (NPDES NO. CA0063509, CI NO. 7497)

Thank you for your submittal dated October 30, 2017, transmitting a Draft Monitoring Plan 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 (Order No. R4-2016-0309) for the subject Facility. Section VII.C.2.b of the Waste Discharge Requirements of Order No. R4-2016-0309 required the Discharger to implement a Compliance Monitoring Program at the mouth of the San Gabriel River in accordance with the *Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants Total Maximum Daily Loads* (Harbor Toxics TMDL). The Regional Water Board reviewed the Draft Plans and provide the following comments:

1. Section 2.2. Sample Media and Frequency. Since the Facility discharges to Coyote Creek, the dry and wet weather conditions used in the Compliance Monitoring Program shall be consistent with the dry and wet weather conditions for Coyote Creek as defined in the San Gabriel River Metals TMDL. The dry and wet weather conditions for Coyote Creek included in the San Gabriel River Metals TMDL are as follows:
    - Dry weather condition applies to any day when the maximum daily flow in Coyote Creek is less than 156 cubic feet per second (cfs) as measured at the Los Angeles County Department of Public Works' (LACDPW) flow gauge station F354-R, located at the bottom of the creek just above the Long Beach Water Reclamation Plant.
    - Wet weather condition applies to any day when the maximum daily flow in Coyote Creek is equal to or greater than 156 cubic feet per second (cfs) as measured at the LACDPW's flow gauge station F354-R, located at the bottom of the creek just above the Long Beach Water Reclamation Plant.

    As such, references to the USGS gauging station 11085000 that were included in the Draft Plans to define dry and wet weather conditions for the Compliance Monitoring Program shall be replaced with references to LACDPW's flow gauge station F354-R and the definition of dry and wet weather conditions for Coyote Creek as indicated above.

Since the Discharger is developing a site-specific Compliance Monitoring Program, and if discharges from the Facility will be intermittent and may not occur for the duration of a calendar year, the Discharger may stipulate in the document that the Discharger will conduct sampling required by the Harbor Toxics TMDL Compliance Monitoring Program only during a calendar year when a discharge occurs from the Facility.

2. Section 3.5. Flow Measurement: If possible, flow measurements shall be conducted during each sampling event at the sampling location at the mouth of the San Gabriel River. However, if it is not possible to measure flow at that location due to safety reasons, a flow measurement shall be taken at the nearest safe location, and the new location shall be documented in the annual report. If no safe sampling location can be identified during a sampling event, the unsafe conditions shall be documented and included in the corresponding annual report, and the Discharger may report the combined flow at the two LACDPW flow gauge stations at San Gabriel River Reach 1 and Coyote Creek as an estimation of flow at the mouth of the River for that sampling event.

   Use of this estimation shall be the least preferable method. The estimation of flow suggested in the Draft Plans based on the sum of the two LACDPW flow gauge stations at San Gabriel River Reach 1 and Coyote Creek may not be representative of the flow at the mouth of the River, as these locations do not account for the inflow to the River downstream of the flow gauge stations and prior to reaching the mouth of the River (approximately 6 miles), the span of which includes inflows from several major dischargers.

3. Section 4.1.3. Equipment Blank Samples: If an equipment blank is not analyzed every sampling event and only annually as suggested, the Plans should include procedures to ensure the proper cleaning of the sampling tubing to avoid cross contamination between sample events and biological growth due to long periods of inactivity.

4. Table A-2. Field Data Reporting Requirements: Please report the actual salinity values for results above 1.0 ppt.

5. Attachment 1. Note to Standardize SWAMP Field Data Sheets: The sample time for each sample (Item 1 listed on the "Key Reminders to Identify Samples" section) shall be its actual collection time, instead of the time of the first sample collected during the same sampling event as indicated in this section).

6. Appendix B.1.1. Analytical Methods and Monitoring Procedures: Please include the laboratory certification in the Draft Plans.

7. Tables B.1. and B.2. Analytical Methods: Replace the column heading "Benchmark" with "Target", so the language is consistent with Attachment A to Resolution No. R11-008. Also, the targets included for all the listed parameters shall be consistent with the corresponding saltwater water column targets (or the human health criteria, whichever is more stringent) listed on Pg. 3 of Attachment A, and the marine sediment targets listed on Pg. 4 of Attachment A. Freshwater targets are not appropriate, as the mouth of the San Gabriel River is estuarine/saltwater.

8. Table B.4. Sample Container, Volume, Preservation, and Holding Times: List the appropriate preservatives to be used for each analysis if the samples are not analyzed immediately.

Please modify the Draft Plans in accordance with the comments included herewith and submit a revised Monitoring Plan and Quality Assurance Project Plan (Final Plans) by March 19, 2018. The Final 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 Final 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 or at (213)576-6696.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

cc: **(Via Email Only)**

Mr. Eric Davis, CH2M
Mr. Cameron Irvine, CH2M
Norwalk Tank Farm Restoration Advisory Board