December 13, 2018

Ms. Deborah Smith, Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013

Dear Ms. Smith:

DOMINGUEZ CHANNEL WATERSHED MANAGEMENT GROUP COORDINATED INTEGRATED MONITORING PROGRAM REQUEST FOR REVISION

The City of Los Angeles, on behalf of the Dominguez Channel Watershed Management Group (DCWMG), which also includes the cities of Carson, El Segundo, Hawthorne, Inglewood, Lawndale, Lomita, and County of Los Angeles and Los Angeles County Flood Control District, is submitting this letter requesting approval of proposed revisions to the DCWMG Coordinated Integrated Monitoring Program (CIMP). This letter fulfills the requirement within the approved DCWMG CIMP to submit a letter to the Regional Board requesting approval from the Executive Officer. The DCWMG proposes the following revision:

The Target Reporting Limit (RL) listed in Table C-2 of Attachment C of the CIMP listed for Total Dissolved Solids (TDS) is 10 mg/L (page C-4). To obtain this RL, the DCWMG must use a contract laboratory to conduct the analysis. The use of a contract laboratory (as opposed to the City of Los Angeles’ Environmental Monitoring Division [EMD] laboratory) results in an increased cost to the DCWMG and poses a risk related to chain of custody/sample security as the samples must be shipped out for analysis. To reduce costs and risk, the DCWMG is requesting approval to revise the Target RL in Table C-2 to 28 mg/L, which EMD can currently attain. There are no TDS water quality objectives applicable to the receiving waters in the DCWMG and detected values for TDS are generally an order of magnitude higher than the proposed revised Target RL of 28 mg/L (number of samples = 59 and average = 480 mg/L).

If you have any questions regarding our comments, please contact me at (213) 485-0587 or via e-mail at Shahram.Kharaghani@lacity.org.

Sincerely,

SHAHRAHM KCHARAGHANI, PhD, PE, BCEE
Program Manager

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