

Monitoring and Reporting Program



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Section One: Monitoring and Reporting Program (MRP)

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Section One Monitoring and Reporting Program (MRP)

1.0 Summary

The Los Angeles County MS4 Permit (Order R4-2012-0175) includes compliance with a **Monitoring and Report Program** (MRP) [No. CI948]. The MRP addresses the several types of monitoring tasks required by the Permit. The City intends to meet these requirements through its **Coordinated Integrated Monitoring Program** (CIMP) submittal.

In addition to the above monitoring tasks, the City is also subject to monitoring tasks required by the Individual Watershed Management Program (I-WMP), which is not referenced in the MRP section. Essentially, these provisions require monitoring of stormwater discharges against water quality standards that are not TMDLs either contained in the basin plan or based on federal regulations. The purpose of the monitoring is to facilitate an evaluation of the adequacy of control measures in meeting the specified limitations. The problem, however, is that the Permit, under the WMP section, does not specify which pollutants and water quality standards must be monitored for or met. Discussions with Regional Board staff revealed that the water quality standards are mandated by federal regulations. They can be taken from the previous Permit under the previous MS4 Permit's MRP under Attachment U.

All pollutants subject to monitoring will be loaded into the RAAWater Quality Model to evaluate to what extent the City is persistently exceeding TMDLs and other water quality standards and identify BMPs that are necessary to preventing such exceedances.



As is explained in the CIMP, there are several provisions of the Permit reflected in the MRP and CIMP that the City cannot comply with because the City has challenged them in its administrative petition. These include, most notably, non-storm water action levels. The City expects these issues to be resolved through a State Board Order in response to an administrative petition it filed challenging this and other MS4 Permit requirements.

1.1 **Coordinated Integrated Monitoring Program**

The City has opted for a CIMP to comply with monitoring and SWMP/WMP requirements under the MS4 Permit. In accordance with the MRP, the CIMP includes the following elements: (1) receiving water monitoring; (2) storm water outfall based monitoring; (3) non-storm water outfall based monitoring; and new development/re-development effectiveness tracking; (4) compliance with municipal action level (MAL) parameters; and (5) regional studies.

It is important to note that the City has complained in its administrative petition about the Permit's excessive monitoring requirements which it argues are arbitrary and capricious and exceed federal stormwater regulations. These include any monitoring activity that is located outside an MS4 (toxicity, wet weather TMDL WLAs, regional studies, toxic investigation evaluation (TIE), etc.); and dry weather monitoring (dry weather minimum levels, non-stormwater outfall monitoring, and non-stormwater action levels). In the alternative, the City will comply with federal field screening requirements for non-stormwater discharges, the purpose of which are to detect and eliminate illicit discharges and illicit connections.



1.2 CIMP Requirements

Through the Comprehensive Integrated Monitoring Program (CIMP) the City proposes to consolidate applicable monitoring program requirements as specified in attachment E of the MS4, which *provides flexibility to allow Permittees to coordinate monitoring efforts on a watershed or sub-watershed basis to leverage monitoring resources in an effort to increase cost-efficiency and effectiveness and to closely align monitoring with TMDL monitoring requirements and Watershed Management Programs.* To that end, the City intends to share costs with cities listed in the table.

Table I – Cost Sharing Participation

| Watershed/Sub-watershed | Participating MS4s |
|--|---|
| <ul style="list-style-type: none">Los Angeles River, Reach 1 and Compton Creek | <ul style="list-style-type: none">Carson and ComptonCarson and Compton |
| <ul style="list-style-type: none">Dominguez Channel | <ul style="list-style-type: none">CarsonComptonGardenaLawndale |

Though the SWAMP should be responsible for performing ambient monitoring, it is not known when, if ever, it intends to conduct ambient monitoring in these reaches. In the meantime, the City recognizes that the ambient monitoring approach will yield accurate data needed to evaluate the beneficial uses and facilitate compliance with ambient TMDL WLAs and other water quality standards.

The City does not plan to use a collaborative approach to pay for monitoring in the receiving water to determine compliance with wet weather TMDLs. This is because it opposes having to comply with wet weather standards in the receiving water. TMDLs are ambient, dry



weather standards, not wet weather standards, the latter of which are not required to determine compliance under federal and state law.

GIS maps have been developed to depict the geographic boundaries of the monitoring plan including the receiving waters, the MS4 catchment drainages and outfalls, sub-watershed boundaries, political boundaries, land use, and the proposed receiving water monitoring stations for both dry weather and wet weather receiving water monitoring (see **Appendix A, Maps**).

1.3 **Receiving Water Monitoring**

The MS4 Permit requires receiving water monitoring to be performed at in-stream mass emissions stations; additional receiving water compliance points approved by the Regional Board's Executive Officer; and additional locations that are representative of impacts from MS4 discharges. The objectives of receiving water monitoring are: (1) determine if receiving water limitations are being achieved; (2) assess trends in pollutant concentrations over time; and (3) determine whether the designated beneficial uses are fully supported based on water chemistry, as aquatic toxicity and bio-assessment monitoring.

The City's receiving water monitoring plan shall be limited to utilizing existing ambient water quality data developed by the Regional Board's Surface Water Ambient Monitoring Program (SWAMP) and data generated by other agencies including but not limited to the Council for Watershed Health (CWH) and the Sanitation Districts of Los Angeles County (SDLAC).

The City cannot participate in any receiving water monitoring activity or action outside of its MS4. As the City's administrative petition effectively argues, the receiving water is not part of the MS4. The City's



responsibility for monitoring ends at the discharge from the outfall before it reaches the receiving water.

The City has also argued in its petition that federal storm water regulations and judicial decisions affirm that MS4 Permit compliance with water quality standards (WQS) is determined at the outfall – not in the receiving water. In other words, the regulatory “range” of an MS4 Permit ends in storm water discharge from the outfall before it reaches the receiving water.

It should be noted that the 9th Circuit Court of Appeal in NRDC v. LACFCD made it very clear that the compliance determinant for MS4 discharges is at the outfall – not the receiving water. The 9th Circuit agreed with a lower federal court ruling that held violations cannot be determined in the receiving water because of evidentiary challenges -- how can one prove that a Permittee caused exceedances in receiving waters which also receive stormwater discharges from other sources? The 9th Circuit also said if a violation is to be determined it must be based on discharges from the outfall.

Further, there is nothing federal law or USEPA guidance, or state law that authorizes compliance with TMDL WLAs or other water quality standards based on wet weather monitoring of receiving waters. According to State Water Quality Order 2001-0015: *There is no provision in state or federal law that mandates the adoption of separate water quality standards for wet weather conditions.* TMDLS and water quality standards are not and cannot be wet weather standards -- they can only be, by definition, ambient (dry weather) standards. Sampling a wet weather discharge from a receiving water (not be confused with an outfall) against a wet weather standard is unrealistic and serves no purpose.



There is also no benefit to performing receiving water monitoring to determine compliance with wet weather TMDL WLAs or to assess the health of the receiving water. Pollutants during a storm event emanate from a variety sources including but not limited to: Permitted facilities such as industrial and construction sites; various municipal point sources; non-municipal point sources (e.g., sewage treatment plants); and non-point sources including atmospheric deposition. It would be impossible to determine which of these dischargers was responsible for exceeding a wet weather WLA, which again is not legally valid in any case. It should be clear that monitoring during a significant storm event would be of no value in assessing the health of the receiving water. In fact, it is the worst time to monitor. The City will, nevertheless, rely on in-stream ambient monitoring to assess the impact of the SWMP/WMP on the beneficial uses of the receiving waters into which it discharges.

1.4 **Storm Water Outfall-Based Monitoring**

The City is committed to stormwater monitoring at the outfall in accordance with federal stormwater regulations. Outfall monitoring will be limited to: (1) aiding in determining compliance with WQBELs (TMDL WLAs and other water quality standards measured against ambient standards); and (2) evaluating stormwater discharges against Municipal Action Levels (MALs). Outfall monitoring, however, will not serve to determine compliance with wet weather TMDL WLAs in the receiving water. Once again, there is no support for the legitimate existence of a wet weather TMDL or any water quality standard; and the purpose of the MALs is unclear and appears to be superfluous. However, the City would be willing to comply with MAL monitoring if offered as alternative to conventional monitoring for compliance purposes.



The City has identified one outfall from which discharges are released to Dominguez Channel; eight to Compton Creek, and one to Los Angeles River, Reach 1. However, the City cannot sample from outfalls because: (1) they are located on property owned and operated by County of Los Angeles Flood Control District (LACFCD); and (2) it would be physically impossible to draw a grab sample from them.

Federal regulations allow monitoring to be conducted at representative field screening points which, along with outfalls, are illustrated on **Appendix A-1**.

Outfall Discharging into Receiving Water



A total of five field screening points been chosen, each of which is located upstream of an outfall. There are a total of 10 outfalls located in the City that discharge from the following sub-watersheds: Compton Creek (8), Dominguez Channel (1), and Los Angeles River, Reach 1 (1). Field screening points have been selected for each of the outfalls, with the exception of those outfalls from which field screening points (viz., manhole points) either do not exist or are inappropriate because of safety issues. The screening points are representative of stormwater discharges from the entire City. The screening points for these sub-watersheds are representative of a mix of residential, industrial and commercial areas.



Instead of collecting three samples for each screening point per year, the City intends to sample three times a year from one of the five field screening points on a rotating basis. Since each of these field screening locations are in residential, commercial, and industrial areas, the samples are expected to yield representative results. At the end of the 5 year term of the Permit the City will be able characterize each of the sub-watersheds for pollution issues. If persistent exceedances of TMDLs and other water quality standards are recorded, the City will propose adjustments to BMPs and other actions in its Report of Waste Discharge (ROWD) -- the MS4 Permit reapplication that is due to the Regional Board 180 days prior to the expiration of the current Permit (May of 2017).

In addition to using the data to determine compliance with WQBELs, the City will also measure stormwater discharges against municipal action levels (MALs). However, as mentioned previously, the City cannot sanction the use of the data to determine compliance with TMDL WLAs or other water quality standards in the receiving water. Once again, the City is not responsible for conducting any monitoring or any activity outside the realm of its MS4. As also mentioned, the City is opposed to measuring stormwater discharges from the outfall against wet weather water quality standards because they are not legally valid.

1.5 **Non-Storm Water Outfall-Based Monitoring**

The City will not perform non-stormwater outfall monitoring to determine compliance with TMDLs, other water quality standards, and action levels. Such requirements exceed federal stormwater regulations. As already explained, MS4 Permittees are required to control pollutants in stormwater discharges from the outfall through BMPs and other



actions. For non-stormwater discharges no such requirement is mandated. MS4 Permittees are required only to prohibit impermissible (i.e., non-exempt) non-stormwater discharges into the MS4. If a Permittee does not succeed in persuading the discharger to prohibit a non-stormwater discharge, it must require the discharger to obtain a separate discharge Permit. This is an argument that was raised in the City's administrative petition and is supported by federal statute and State Board water quality orders.

However, the City will perform outfall visual and sampling monitoring in connection with illicit connection and discharge elimination requirements in keeping with federal stormwater regulations and USEPA guidance. Non-stormwater discharge monitoring will conform to 122.26(d)(1)(D) for the purpose of screening for illicit connections and dumping, which specifies visual monitoring at outfalls for dry weather (non-stormwater discharges). Visual monitoring shall be performed twice a year during dry periods. If flow is observed samples for the outfall (or field screening points):

...samples shall be collected during a 24 hour period with a minimum period of four hours between samples. For all such samples, a narrative description of the color, odor, turbidity, the presence of an oil sheen or surface scum as well as any other relevant observations regarding the potential presence of non-storm water discharges or illegal dumping shall be provided.

In addition, regulations require a narrative description of the results from sampling for fecal coliform, fecal streptococcus, surfactants (MBAS), residual chlorine, fluorides and potassium; pH, total chlorine, total copper, total phenol, and detergents (or surfactants) shall be provided along with a description of the flow rate. These analytes will be used as potential indicators of illicit discharges, which would trigger an up-stream



investigation to identify the source of the suspected illicit discharge or connection. If the source of the illicit discharge/connection and discharger is identified, the City shall notify the discharge that it will need to halt the discharge and, if not feasible, will require the discharger to obtain a discharge Permit.

1.6 Municipal Action Levels

The purpose of municipal action levels (MALs) is not clear and appears to be superfluous given the Permit's other monitoring requirements. All of the MAL constituents are already addressed by TMDLs and federally mandated monitoring for certain constituents¹. The MS4 Permit's fact sheet mentions that the purpose of MAL monitoring is to evaluate the effectiveness of a Permittee's stormwater management program in reducing pollutant loads from drainage areas as a means of determining compliance with the maximum extent practical (MEP) standard. There is no guidance in the Permit to explain how this task is to be accomplished. MAL monitoring is also intended to evaluate the effectiveness of post-construction BMPs. It is not clear, however, how MALs can evaluate post-construction BMPs. One basic question is where would MAL monitoring be performed, at the development or new development site, for which post-construction BMPs have been prescribed, or down stream from it? The City has challenged the MAL monitoring requirement in its administrative petition, based on these and other concerns. MAL monitoring represents an unnecessary cost that accomplishes nothing beneficial. Nevertheless, because MAL constituents are included in other stormwater monitoring requirements,

¹Total nitrogen, total phosphorous, Ammonia N, TKN, Total PCBs, Chlordane, Dieldrin, 4,4 – DDD, 4,4 – DDE, 4,4 –DDT, Cadmium, Chromium, copper, lead, zinc, E-Coli, fecal coliform.



the City will effectively be meeting this task. The Permit's monitoring program also requires non-stormwater MAL compliance. As mentioned, the City has challenged all non-stormwater monitoring tasks that are intended to determine compliance with TMDLs and other water quality standards.

1.7 New Development/Redevelopment Tracking

The PLDP requires tracking new development and redevelopment projects within 60 days of the Permit's adoption (unless a Permittee chooses to participate in Watershed Management Program). Although not a monitoring requirement per se, Permittees are nevertheless required to maintain a database containing the following information:

- name of the project and developer
- project location and map (preferably linked to the GIS storm drain map)
- date of Certificate of Occupancy
- 85th percentile storm event for the project design (inches per 24 hours)
- 95th percentile storm event for projects draining to natural water bodies (inches per 24 hours), related to hydromodification
- other design criteria required to meet hydromodification requirements for drainages to natural water bodies,
- project design storm (inches per 24-hours)
- project design storm volume (gallons or MGD)
- percent of design storm volume to be retained on site
- design volume for water quality mitigation treatment BMPs, if any



- If flow through, water quality treatment BMPs are approved, provide the one year, one-hour storm intensity as depicted on the most recently issued isohyetal map published by the Los Angeles County Hydrologist
- percent of design storm volume to be infiltrated at an off-site mitigation or groundwater replenishment project site
- percent of design storm volume to be retained or treated with bio-filtration at an off-site retrofit project
- location and maps (preferably linked to the GIS storm drain map required in Part VII.A of this MRP) of off-site mitigation, groundwater replenishment, or retrofit sites documentation of issuance of requirements to the developer

The City intends to meet the foregoing tracking tasks through a revised SUSMP evaluation form (see **Section Two, SUSMP Appendix B-4**).

1.8 **Regional/Special Studies**

The City has taken the position that it is not responsible for performing any activity that lies outside of its MS4, the end of which is the outfall. The Regional Board studies referenced in the CIMP include activities in the receiving water, which lies outside of the scope of the MS4. In its administrative petition the City explained that neither federal regulations nor state law or water quality orders require performing monitoring or other activities outside of an MS4.

1.09 **Toxicity Monitoring**

The MRP of the MS4 Permit requires toxicity testing at the outfall and in the receiving water. As mentioned, the City is not required under federal or state law to perform any monitoring in the receiving water. However, the City intends to perform outfall monitoring for toxics.



Pesticide (PCBs and DDT) and metals (copper, lead, zinc, and selenium) at the outfalls. Water samples were tested with either of two different organisms: 7-day test with *Ceriodaphnia dubia* (growth, survival) and 7-day test with *Pimephales promelas* (biomass, survival).

1.10 Chemical TMDL Monitoring and Compliance Schedule

Chemical TMDL sampling will be performed at field screening points from stormwater discharges at least three times a year. Sampling and analysis will be in keeping with USEPA guidance. The tables below specifies interim and final TMDL WLAs and compliance deadline dates to which the City is subject.

Table II – Dominguez Channel Toxics TMDL (Wet Weather)

| Toxics TMDL | Wet Weather Interim WLA | Deadline | Wet Weather Final WLA | Deadline |
|----------------|-------------------------|-------------|-----------------------|------------|
| • Total Copper | 207.51 µg/L | March, 2012 | 1300.3 g/day | March 2032 |
| • Total Lead | 122.88 µg/L | March, 2012 | 5733.7 g/day | March 2032 |
| • Total Zinc | 898.87 µg/L | March, 2012 | 9355.5 g/day | March 2032 |
| • Toxicity | 2 TUc | March, 2012 | 1 TUc | March 2032 |

Table III – Dominguez Channel Toxics TMDL (Dry Weather)

| Toxics TMDL | Wet Weather Interim WLA | Deadline | Wet Weather Final WLA | Deadline |
|----------------|-------------------------|-------------|-----------------------|------------|
| • Total Copper | 207.51 µg/L | March, 2012 | 1300.3 g/day | March 2032 |
| • Total Lead | 122.88 µg/L | March, 2012 | 5733.7 g/day | March 2032 |
| • Total Zinc | 898.87 µg/L | March, 2012 | 9355.5 g/day | March 2032 |
| • Toxicity | 2 TUc | March, 2012 | 1 TUc | March 2032 |



Table IV – Dry and Wet Weather TMDL WLAs for Los Angeles River (Reach 1) and Compton Creek

| Wet Weather WLAs | | | | |
|--|--|---|-------------|---------------------|
| Water Body | Copper | Lead | Zinc | Trash |
| Los Angeles River, Reach 1 and Compton Creek | 17 ug/l | 62 ug/l | 159 ug/l | See Table X Below |
| Water Body | Bacteria | - | - | - |
| Los Angeles River, Reach 1 and Compton Creek | 235 MPN/100 ml | - | - | - |
| Water Body | Nutrients² | - | - | - |
| Los Angeles River Reach 1 and Compton | 7.2 mg/l | - | - | - |
| Dry Weather WLAs | | | | |
| Water Body | Copper | Lead | Zinc | Trash |
| Los Angeles River Reach 1 and Compton Creek | 23 ug/l (R 1) 19 ug/l (Compton Creek) | 12 ug/l (R 1) 8.9 ug/l (Compton Creek) | - | Same As Wet Weather |
| Water Body | Bacteria (Interim) | Bacteria (Final) | - | - |
| Los Angeles River Reach 1 and Compton Creek | 2 MPN/day | 235 MPN/100 ml | - | - |

Table V – Compton Creek Bacteria TMDL Compliance Schedule

| Final Waste Load Allocation(dry weather) | Deadline |
|--|--------------------|
| 235 MPN/100 ml | September 23, 2025 |
| Final Waste Load Allocation (wet weather) | Deadline |
| 235 MPN/100 ml | March 23, 2037 |

²This TMDL does not apply because it is not valid. It is a “reconsideration” of the Los Angeles River Nitrogen and Related Effects TMDL to Incorporate Site-Specific Objectives for Ammonia that was adopted by the Los Angeles Regional Board on December 6, 2012. It has not been approved by the State Water Resources Control Board. Further, this proposed TMDL appears to apply only to waste water treatment facilities, not MS4s.



**Table VI – Los Angeles River Reach 1 Bacteria TMDL
Compliance Schedule**

| Final Waste Load Allocation(dry weather) | Deadline |
|--|-----------------|
| 235 MPN/100 ml | March 23, 2024 |

| Final Waste Load Allocation(wet weather) | Deadline |
|--|-----------------|
| 235 MPN/100 ml | March 23, 2037 |

**Table VII - Compton Creek/Los Angeles River
Trash TMDL Compliance Schedule**

| Year | Implementation Year | Waste Load Allocation | Compliance Point |
|-------------|----------------------------|---|--|
| 9-08 | Year 1 | 60% of Baseline Waste Load Allocations for the Municipal Permittees and Caltrans | 60% of the baseline load |
| 9-09 | Year 2 | 50% of Baseline Waste Load Allocations for the Municipal Permittees and Caltrans | 55% of the baseline load calculated as a 2-year annual average |
| 9-10 | Year 3 | 40% of Baseline Waste Load Allocations for the Municipal Permittees; and Caltrans | 50% of the baseline load calculated as a rolling 3-year annual average |
| 9-11 | Year 4 | 30% of Baseline Waste Load Allocations for the Municipal Permittees; and Caltrans | 40% of the baseline load calculated as a rolling 3-year annual average |
| 9-12 | Year 5 | 20% of Baseline Waste Load Allocations for the Municipal Permittees; and Caltrans | 30% of the baseline load calculated as a rolling 3-year annual average |
| 9-13 | Year 6 | 10% of Baseline Waste Load Allocations for the Municipal Permittees; and Caltrans | 20% of the baseline load calculated as a rolling 3-year annual average |
| 9-14 | Year 7 | 0% of Baseline Waste Load Allocations for the Municipal Permittees; and Caltrans | 10% of the baseline load calculated as a rolling 3-year annual average |



| | | | |
|------|--------|--|---|
| 9-15 | Year 8 | 0% of Baseline Waste Load Allocations for the Municipal Permittees; and Caltrans | 3.3% of the baseline load calculated as a rolling 3-year annual average |
| 9-16 | Year 9 | 0% of Baseline Waste Load Allocations for the Municipal Permittees; and Caltrans | 0% of the baseline load calculated as a rolling 3-year annual average |

1.11 MAL Monitoring

Stormwater sampling against MAL analytes shall be performed at the same time stormwater monitoring is performed for other purposes and with the same frequency – three times during the wet season. The table below identifies the MAL analytes and their numeric limitations.

Table VIII - Municipal Action Levels

| Metals | Unit | Total | Dissolved |
|----------|------|-------|-----------|
| Cadmium | ug/l | 2 | 0.55 |
| Copper | ug/l | 32 | 12.8 |
| Lead | ug/l | 30.6 | 6 |
| Zinc | ug/l | 232 | 104 |
| Nickel | ug/l | 9.6 | NA |
| Chromium | ug/l | 10.5 | 1.5 |

| Bacteria | Unit | Geometric Mean | Single Sample |
|----------------|-----------|----------------|---------------|
| E-Coli | MPN/100mL | 126 | 235 |
| Fecal Coliform | MPN/100mL | 200 | 400 |

| Nutrients | Unit | 1 Hour Average | 30 Day Average |
|------------------|------|----------------|----------------|
| Total Phosphorus | mg/l | 126 | 235 |
| Total Nitrogen | mg/l | 200 | 400 |

1.12 Action Level Monitoring

The tables below lists non-stormwater action level analytes for Dominguez Channel, Compton Creek/Los Angeles River (Reach 1) and



Machado Lake. As mentioned, the City does not intend to conduct action level or any other non-stormwater monitoring at the outfall. Such monitoring is not authorized under the Clean Water Act and is contrary to State Board water quality orders. Because non-stormwater discharges are not subject to an iterative process an exceedance would place a Permittee in violation. Nevertheless, the City shall conduct non-stormwater monitoring to detect and eliminated illicit discharges and connections (see below Section 1.14).

Table IX – Action Levels (Non-Stormwater) for Dominguez Channel

| Analyte | Units | Average Monthly | Daily Maximum |
|--------------------------------|----------------|-----------------------|------------------|
| Ph | Standard units | 6.0-9.02 ³ | |
| <i>E. coli</i> Bacteria | #/100 ml | 126 ⁴ | 235 ⁵ |
| Chloride | mg/L | 0 ⁶ | -- |
| Sulfate | mg/L | 0 ⁷ | -- |
| Total Dissolved Solids | mg/L | 5.0 ⁸ | -- |
| Nitrate Nitrogen, Total (as N) | mg/L | 1.0 ⁹ | -- |
| Turbidity | NTU | 5.0 ¹⁰ | |
| Aluminum, Total Recoverable | mg/L | 1.0 ¹¹ | -- |
| Cyanide, Total Recoverable | µg/L | 4.3 | 8.5 |
| Copper, Total Recoverable | µg/L | 0 ¹² | |
| Mercury, Total Recoverable | µg/L | 0.051 | 0.10 |
| Selenium, Total Recoverable | µg/L | 4.1 | 8.2 |
| <i>E. coli</i> Bacteria | #/100 ml | 126 | 235 |

1.13 Additional Monitoring Required for I-WMP Compliance

³Within the range of 6.5 to 8.5

⁴*E.coli* density shall not exceed a geometric mean of 126/200 ml

⁵*E.coli* density in a single sample shall not exceed shall not exceed 235/100 ml

⁶In accordance with applicable water quality objectives contained in Chapter 3 of the Basin Plan

⁷Same as Chloride (see footnote 13)

⁸Same as Chloride (see footnote 13)

⁹Applies only to beneficial uses designated for MUN per tables 2-1 and 2-2 of the Basin Plan

¹⁰Same as N (see footnote 16)

¹¹Same as N (see footnote 16)

¹²Hardness dependent



MRP section VI.C.2.a.i and ii requires additional outfall monitoring tasks for Permittees that opt for the WMP. They include pollutants that are currently not TMDLs but are nevertheless 303(d) listed (e.g., cyanide). Regional Board staff has suggested that other water quality standards be included that can found in the previous MS4 in attachment U of the Monitoring Program.

The purpose of this monitoring task is to identify non-TMDL pollutants are causing impairments to beneficial uses of receiving waters and to evaluate the effectiveness of BMPs implemented through the SWMP/WMP. They are also included to determine if non-TMDL pollutants are causing or contributing to exceedances of receiving water limitations. The City takes the position that the detection of an exceedance does not constitute a violation. Any persistent exceedance of a TMDL or water quality standard monitored over the term of the Permit would not constitute a violation provided that (1) the SWMP/WMP is being implemented in a timely and complete manner; and (2) complies with the iterative process described in MS4 Permit section V.A.1-4.

Resulting data generated from WMP-related monitoring will be, along with TMDL monitoring, loaded into the water quality model. These pollutants will be added to the stormwater outfall sampling list.

Table X - WMP Monitoring for Non-TMDL Water Quality Standards

| CONSTITUENTS | USEPA METHOD | Maximum Detection Limits |
|--------------------------------|--------------|--------------------------|
| CONVENTIONAL POLLUTANTS | | Mg/L |
| Oil and Grease | 1664 | 5 |
| Total Phenols | 420.1 | 0.1 |
| Cyanide | | 0.005 |
| pH | 150.1 | 0 – 14 |
| Temperature | | None |
| Dissolved Oxygen | | Sensitivity to 5 mg/L |
| BACTERIA | | |



| | | |
|------------------------------------|-------|--------------|
| Total Coliform | 9221B | <20mpn/100ml |
| Fecal Coliform | 9221B | <20mpn/100ml |
| Enterococcus | 9221B | <20mpn/100ml |
| GENERAL | | Mg/L |
| Dissolved Phosphorus | 300 | 0.05 |
| Total Phosphorus | 300 | 0.05 |
| Turbidity | 180.1 | 0.1NTU |
| Total Suspended Solids | 160.2 | 2 |
| Total Dissolved Solids | 160.1 | 2 |
| Volatile Suspended Solids | 160.4 | 2 |
| Total Organic Carbon | 415.1 | 1 |
| Total Petroleum Hydrocarbon | 1664 | 5 |
| Biochemical Oxygen Demand | 405.1 | 2 |
| Chemical Oxygen Demand | 410.4 | 20-900 |
| Total Ammonia-Nitrogen | 350.2 | 0.1 |
| Total Kjeldahl Nitrogen | 351.2 | 0.1 |
| Nitrate-Nitrite | 4110 | 0.1 |
| Alkalinity | 310.1 | 2 |
| Specific Conductance | 120.1 | 1umho/cm |
| Total Hardness | 130.2 | 2 |
| MBAS | 425.1 | <0.5 |
| Chloride | 4110 | 2 |
| Fluoride | 4110 | 0.1 |
| Sulfate | 4110 | 2 |
| Methyl tertiary butyl ether (MTBE) | | 1 |

1.14 Non-stormwater Monitoring for IC/ID

As mentioned above, the City proposes to perform non-stormwater monitoring to detect and eliminate illicit connections and discharges in accordance with 40 CFR 122.26(d)(1)(D). Monitoring will consist of dry weather visual observations at outfalls or field screening points, which shall be conducted monthly during the dry season (May 1 to September 30) -- see **Appendix A-1** for field screening locations. If flow is detected, grab samples are to be taken within a 24 hour period and measured against fecal coliform, fecal streptococcus, surfactants (MBAS), residual chlorine, fluorides, and potassium. Other constituents may be added later based on USEPA's ICID-DE guidance manual.



1.15 Reporting Requirements

The City shall comply with all reporting requirements specified in the MRP. The City cannot begin to report monitoring results until: (1) the I-WMP and MRP have been approved by the Regional Board, (expected to happen 4 months after the June 28th WMP submittal date); and (2) one round of monitoring has been conducted during October 2014-April 2015 wet season. Results will be reported to the Regional Board on or before December of 2015. By this time, it is expected that the County of Los Angeles will have developed a standardized annual report form that will include reporting criteria for the MS4 Permit, TMDLs, MALs and certain water quality standards.

1.16 Monitoring Protocols

The MRP requires a variety of monitoring requirements that are governed by monitoring protocols established by USEPA, which are summarized below.

i. *Toxicity Monitoring/Testing Protocol*

Ceriodaphnia dubia are an EPA recommended freshwater invertebrate used in both acute and chronic toxicity testing. In acute toxicity testing, *Ceriodaphnia* are used at <24 hours old and survival rates are recorded. In chronic toxicity testing, *Ceriodaphnia* are used at <24 hours old and all neonates must have been released within 8 hours of each other. In chronic tests, survival and reproduction are recorded. *Ceriodaphnia dubia* are exposed in a static renewal system to different concentrations of effluent, or to receiving water, until 60% or more of surviving control females have three broods of offspring. Test results are based on survival and



reproduction. EPA method 1002.0 use for toxicity testing. The *C. dubia* chronic tests consist of ten replicate 20 ml glass vials each containing one organism. Tests are initiated with less than 24-hour-old *C. dubia*, born within an 8-hour period. *C. dubia* are fed a mixture of *S. capricornutum* and YCT (a mixture of yeast, organic alfalfa and trout chow) daily. *C. dubia* are transferred into a new vial of fresh solution daily. Sierra Springs™ water amended to EPA moderately hard (SSEPAMH) water is used as the control water for the *C. dubia* test. Tests are conducted at $25 \pm 2^\circ \text{C}$ with a 16-hour light: 8-hour dark photoperiod. Mortality and reproduction (number of neonates) are assessed daily and at test termination (day 7).

ii. *USEPA sampling protocol*

For each field screening point, sample shall be collected of storm water discharge from three storm events occurring at least one month apart in accordance with the requirements indicated below:

- For storm water discharges, all samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inch and at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. For all applicants, a flow-weighted composite shall be taken for either the entire discharge or for the first three hours of the discharge. The flow-weighted composite sample for a storm water discharge may be taken with a continuous sampler or as a combination of a minimum of three sample aliquots taken in each hour of discharge for the entire discharge or for the first three hours of the discharge, with each aliquot being separated by a minimum



period of fifteen minutes. For a flow-weighted composite sample, only one analysis of the composite of aliquots is required. For all storm water Permit applicants taking flow-weighted composites, quantitative data must be reported for all pollutants specified in §122.26 except pH, temperature, cyanide, total phenols, residual chlorine, oil and grease, fecal coliform, and fecal streptococcus.

1.17 Implementation Schedule (Milestones)

The table below provides a schedule for implementing MRP/CIMP tasks.

Table XI – Implementation Schedule

| Task | Deadline Date |
|--|---|
| <ul style="list-style-type: none"> Submit WMP, MRP, and CIMP to Regional Board | No later than June 28, 2014 |
| <ul style="list-style-type: none"> Using GIS mapping, provide land use overlay of City's storm drain system | No later than June 28, 2014 |
| <ul style="list-style-type: none"> Using GIS mapping, show City's storm drain system including catch basins and connections to receiving waters | No later than June 28, 2014 |
| <ul style="list-style-type: none"> Using GIS mapping, identify watershed and sub-watershed based on Los Angeles County's HUC 12 equivalent boundaries | No later than June 28, 2014 |
| <ul style="list-style-type: none"> Using GIS mapping, identify: stormwater outfalls and field screening points; mass emission and other in-stream monitoring points/stations; and ambient monitoring locations established by the Regional Board's Surface Water Ambient Monitoring Program (SWAMP); and locations established by the Council for Watershed Health. | No later than June 28, 2014 |
| <ul style="list-style-type: none"> Conduct outfall monitoring for stormwater discharges for TMDLs, other water quality standards, MALs, and toxicity three times beginning during 2015-2016 wet season and annually thereafter. | Beginning no later than October of 2015 |
| <ul style="list-style-type: none"> During the dry season, conduct monthly non-stormwater visual observations and grab sampling if flow is detected. | No later than May 1, 2015 |
| <ul style="list-style-type: none"> If no data exists the City shall contract for the CWH to conduct ambient monitoring once during the term of the Permit for Dominguez Channel (costs to be shared with the cities of Carson and Gardena) | No later than June 28, 2015 |
| <ul style="list-style-type: none"> Review available ambient monitoring data and studies | No later than June 28, 2014 |



| | |
|--|---|
| to assess the health of the Dominguez at both reaches (above and below Vermont Avenue) | |
| <ul style="list-style-type: none"> Submit annual monitoring reports to the Regional Board of any available TMDL or other water quality standards data generated through outfall monitoring. | Beginning no later than December of 2014 |
| <ul style="list-style-type: none"> Submit new development/redevelopment track form. | No later than one month following the Regional Board's approval of the CIMP |

END SECTION ONE MRP-CIMP



Appendix A

Maps

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Appendix A-1

Outfall and Field Screening Location Map

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Appendix A-2

In-stream Monitoring Locations

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Appendix A-3

Watershed/Sub-watershed & City Boundary Map

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Appendix A-4

Storm Drain/Catch Basin Map

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Appendix A-5

City Land Use Map

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Appendix B

2010 303(d) List for Dominguez Channel, Machado Lake, and Los Angeles River (Reach 1) and Compton Creek

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Appendix B

Table I – 303(d) List – Dominguez Channel

| 2010 303 (d) List | | | |
|---|-------------------------|------------------|-----------------------|
| Water Body | Parameter | TMDL Status Date | Source |
| Dominguez Channel (below Vermont Avenue) | Ammonia | 2019 | Nonpoint/Point Source |
| | BMB | 2019 | Nonpoint/Point Source |
| | Benzo Pyrene (PAHs) | 2019 | Source Unknown |
| | Benzo Anthracene (PAHs) | 2019 | Source Unknown |
| | Chlordane (tissue) | 2019 | Source Unknown |
| | Chrysene (C1-C4) | 2019 | Source Unknown |
| | Coliform Bacteria | 2007 | Nonpoint/Point Source |
| | DDT (tissue & Sediment) | 2019 | Nonpoint/Point Source |
| | Dieldrin (tissue) | 2019 | Nonpoint/Point Source |
| | Lead (tissue) | 2019 | Nonpoint/Point Source |
| | PCBs | 2019 | Source Unknown |
| | Phenanthrene | 2019 | Source Unknown |
| | Pyrene | 2019 | Source Unknown |
| | Zinc (sediment) | 2019 | Nonpoint/Point Source |
| | Sediment Toxicity | 2021 | Nonpoint Source |



Table II – 303(d) List – Los Angeles River (Reach 1) and Compton Creek

| 2010 303 (d) List | | | |
|---|-------------------|------------------|-------------------------|
| Water Body | Parameter | TMDL Status Date | Source |
| Los Angeles River (Reach 1) and Compton Creek | Coliform Bacteria | 2009 | Nonpoint/Point Source |
| | Trash | 2005 | Nonpoint/Surface Runoff |
| | Copper, Dissolved | 2005 | Nonpoint/Point Source |
| | Lead, Dissolved | 2005 | Nonpoint/Point Source |
| | Zinc, Dissolved | 2005 | Nonpoint/Point Source |
| | Nutrients (Algae) | 2004 | Nonpoint/Point Source |



Appendix C

Total Maximum Daily Loads

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Appendix C-1

Dominguez Channel TMDLs

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Appendix C-2

Los Angeles River (Reach 1) and Compton Creek TMDLs

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