

Los Angeles Regional Water Quality Control Board

September 21, 2015

Permittees of the Dominguez Channel Watershed Management Area Group¹
(See Distribution List)

APPROVAL, WITH CONDITIONS, OF THE DOMINGUEZ CHANNEL WATERSHED MANAGEMENT AREA GROUP COORDINATED INTEGRATED MONITORING PROGRAM, PURSUANT TO ATTACHMENT E, PART IV.B OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Permittees of the Dominguez Channel Watershed Management Area Group:

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board) has reviewed the revised monitoring program submitted on April 4, 2015 by the Dominguez Channel Watershed Management Area Group (Group). This monitoring program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop and implement a coordinated integrated monitoring program (CIMP) that achieves the five Primary Objectives set forth in Part II.A of Attachment E and includes the elements set forth in Part II.E of Attachment E. These programs must be approved by the Executive Officer of the Los Angeles Water Board.

The Los Angeles Water Board has reviewed the Group's revised CIMP and has determined that the CIMP includes the elements set forth in Part II.E of Attachment E and will achieve the Primary Objectives set forth in Part II.A of Attachment E of the LA County MS4 Permit.

Public Review and Comment

On July 3, 2014, the Board provided public notice and a 46-day period to allow for public review and comment on the Group's draft CIMP. A separate notice of availability regarding the draft CIMPs, including the Group's CIMP, was directed to State Senators and Assembly Members within the Coastal Watersheds of Los Angeles County. The Board received three comment letters that had comments applicable to the Group's draft CIMP. One joint letter was from the Natural Resources Defense Council (NRDC), Heal the

¹ Permittees of the Dominguez Channel Watershed Management Area Group CIMP include the Los Angeles County Flood Control District; the County of Los Angeles; and the cities of Los Angeles, Hawthorne, Inglewood, El Segundo, and Lomita.

Bay, and Los Angeles Waterkeeper, and the other letters were from the Construction Industry Coalition on Water Quality (CICWQ) and Ventura Countywide Stormwater Quality Management Program. During the review of the draft and revised CIMP, the Los Angeles Water Board considered those comments applicable to the Group's proposed CIMP.

Los Angeles Water Board Review

Concurrent with the public review, the Los Angeles Water Board, along with U.S. EPA Region IX staff, reviewed the draft CIMP. On November 25, 2014, the Los Angeles Water Board sent a letter to the Group detailing the Board's comments on the draft CIMP and identifying the revisions that needed to be addressed prior to the Board's approval of the Group's CIMP. The letter directed the Group to submit a revised CIMP addressing the Los Angeles Water Board's comments. Prior to the Group's submittal of its revised CIMP, the Los Angeles Water Board staff had a meeting on February 27, 2015 and email exchanges with the Group's representatives and consultants to discuss the Board's remaining comments and necessary revisions to the draft CIMP. The Group submitted its revised CIMP on April 4, 2015 for Los Angeles Water Board review and approval.

In separate correspondence to all Permittees developing CIMPs and Integrated Monitoring Programs (IMPs), the Los Angeles Water Board provided clarification of requirements for toxicity monitoring – specifically regarding additional toxicity monitoring upstream and at outfalls where toxicity is identified during a sampling event at a receiving water monitoring site.

CIMP Approval

The Los Angeles Water Board hereby approves, subject to the following conditions, the Group's April 4, 2015 revised CIMP. The Board may rescind this approval if all of the following conditions are not met to the satisfaction of the Board within the timeframe provided below.

1. Revise the monitoring locations listed in the CIMP and Attachment B "Monitoring Location Fact Sheets and Justification" such that each Permittee in the Group is represented by appropriate stormwater outfall and receiving water monitoring locations. Specifically, include a stormwater outfall monitoring site that captures discharges from the City of Inglewood. The Group may satisfy this condition by submitting for approval a modification to the CIMP that includes the required monitoring location(s) by **December 21, 2015**.
2. Provide additional detail on the Harbor Toxics TMDL sediment monitoring program for Dominguez Channel Estuary:
 - a. Revise Section 2.2.2 "DCWMA TMDL Sites" (pg. 13) to include a paragraph that states that sediment quality objective evaluation as detailed in the SQO Part 1 (sediment triad sampling) shall be performed every five years in the Dominguez Channel Estuary per the Harbor Toxics TMDL; and that sampling and analysis for the full chemical suite, a minimum of two toxicity tests and four benthic indices as specified in SQO Part 1 will be conducted and evaluated.
 - b. Revise Section 2.2.2 "DCWMA TMDL Sites" (pg. 13) to state that sediment chemistry samples shall also be collected every five years in addition to, and in between, sediment triad sampling events, to evaluate trends in

- general sediment quality constituents and listed constituents relative to sediment quality targets.
- c. Update Table 2-4 (pgs. 16-19) as appropriate based on the above changes.
3. Update the receiving water monitoring for Machado Lake listed in Table 2-4 (pgs. 16-19):
 - a. Ensure that every three years a water sample from the Machado Lake, Middle (ML-3) monitoring location analyzes for PCBs, DDTs, dieldrin, and total chlordane. This sample should be associated with wet-weather conditions.
 - b. Include dieldrin in the bioaccumulation (fish tissue) monitoring at the Machado Lake Middle (ML-3) monitoring location at a frequency of at least once every 3 years.
 4. Update the stormwater outfall monitoring listed in Table 4-2 (pg. 31):
 - a. Include TOC and dieldrin in suspended sediment monitoring for the outfalls discharging to Machado Lake.
 5. Include annual dry weather water and suspended sediment samples at stormwater outfall monitoring locations discharging to Dominguez Channel, Dominguez Channel Estuary, and Torrance Lateral as required by the Harbor Toxics TMDL. These samples should be analyzed for lead, zinc, copper, DDT, PCBs, benzo[a]anthracene, benzo[a]pyrene, chrysene, phenanthrene, and pyrene.
 6. Include the City of Lomita's March 30, 2015 letter regarding Machado Lake monitoring as an attachment to the CIMP.
 7. Update the phased schedules listed in Sections 12.4 and 12.5 to indicate that there will be sampling for at least one receiving water site and one stormwater outfall monitoring site in Year 1 (this can be conducted through a portable sampler or manual composite sampling if no autosamplers can begin sampling).
 8. Submit a copy of the Group's outfall database and copies of the GIS files related to the items listed in Table 3-1 (pgs. 24-26) of the revised CIMP.

The Group shall submit a final CIMP to the Los Angeles Water Board that satisfies all of the above conditions no later than **October 21, 2015**. Pursuant to Attachment E, Part IV.C.6 of the LA County MS4 Permit, the Group must commence implementing its monitoring program within 90 days after this approval of the final CIMP (i.e. no later than December 21, 2015). Please note that the Group is responsible for complying with all reporting provisions included in Attachment E, Part XIV – XVIII and Section C of Part XIX, "Reporting Requirements for Dominguez Channel and Greater Harbors Waters WMA TMDLs," and Attachment D, Sections IV, V, and VII.A of the LA County MS4 Permit. Additionally, the Group is also responsible for complying with the following requirements under Annual Reporting and Adaptive Management.

Annual Reporting

Within the reporting year, through its Annual Report per Attachment E, Part XVIII of the LA County MS4 Permit, the Group shall report on the status of the phased initiation of stormwater outfall monitoring established in the revised CIMP and specified below.

- Table 12-1 "Receiving Water Monitoring Locations with Sampling Stations"
- Table 12-2 "Storm Water Outfall Sampling Station Schedule"
- Section 12.4 "Receiving Water Monitoring Phased Schedule"

- Section 12.5 "Storm Water Outfall Monitoring Phase Schedule"

In addition, the Annual Report shall provide an Integrated Monitoring Report that summarizes all identified exceedances of:

- outfall-based stormwater monitoring data,
- wet weather receiving water monitoring data,
- dry weather receiving water monitoring data, and
- non-storm water outfall monitoring data

against all applicable receiving water limitations, water quality-based effluent limitations, non-storm water action levels, and aquatic toxicity thresholds as defined in Sections XII.F and G of this MRP. All sample results that exceeded one or more applicable thresholds shall be readily identified.

The Annual Report shall also include a Municipal Action Level (MAL) Assessment Report, which shall present the stormwater outfall monitoring data in comparison to the applicable MALs, and identify those subwatersheds with a running average of twenty percent or greater of exceedances of the MALs in discharges of stormwater from the MS4. Please note that beginning in Year 3 after the effective date of the LA County MS4 Permit, each Permittee or group of Permittees shall submit a MAL Action Plan with the Annual Report (first MAL Action Plan due with December 15, 2015 Annual Report) to the Regional Water Board Executive Officer, for those subwatersheds with a running average of twenty percent or greater of exceedances of the MALs in any discharge of storm water from the MS4. Please note that implementation of an approved Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP) per Part VI.C of the LA County MS4 Permit fulfills all requirements related to the development and implementation of the MAL Action Plan, as per Attachment G of the LA County MS4 Permit, for those pollutants addressed by the WMP or EWMP.

Adaptive Management

The Regional Water Board or its Executive Officer, consistent with 40 CFR section 122.41, may approve changes to the Monitoring and Reporting Program, after providing the opportunity for public comment, either:

1. By request of the Group or by an interested person after submittal of the Monitoring Report. Such request shall be in writing and filed not later than 60 days after the Monitoring Report submittal date, or
2. As deemed necessary by the Regional Water Board Executive Officer, following notice to the Group.

As part of the adaptive management provisions of the permit, any modifications to the CIMP must be submitted to the Los Angeles Water Board for review and approval. The Group must implement any modifications to the CIMP upon approval by the Los Angeles Water Board or its Executive Officer, or within 60 days of submittal of modifications if the Los Angeles Water Board or its Executive Officer expresses no objections. Note that the Group's Report of Waste Discharge (ROWD) is due no later than July 1, 2017. To align any modifications to the CIMP proposed through the adaptive management provisions of the permit with permit reissuance, results of the first adaptive management cycle should be submitted in conjunction with the Group's ROWD.

If you have any questions, please contact Mr. Chris Lopez of the Storm Water Permitting Unit by electronic mail at Chris.Lopez@waterboards.ca.gov or by phone at (213) 576-6674. Alternatively, you may also contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosures: Dominguez Channel Watershed Management Area Group Distribution List