



**CITY OF** **RANCHO PALOS VERDES**  
DEPARTMENT OF PUBLIC WORKS

December 13, 2017

Mr. Samuel Unger, P.E.  
Executive Officer  
California Regional Water Quality Control Board—Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Attention: Ms. Rebecca Christmann

**Subject: Peninsula Watershed Enhanced Watershed Management Program Request for Schedule Revision**

Dear Mr. Unger,

The Cities of Rancho Palos Verdes, Palos Verdes Estates and Rolling Hills Estates respectfully request a change in the implementation schedule of the Palos Verdes Peninsula Enhanced Watershed Management Program (Peninsula EWMP). The Palos Verdes Peninsula Watershed Management Group (Peninsula WMG) led by the City of Rancho Palos Verdes has been fortunate to secure grant funding through the Prop 84 Clean Beaches/Santa Monica Bay Restoration Grant Program to fund approximately 60% of the cost of installation of certified full capture devices throughout the Santa Monica Bay watershed area, with the balance of the cost to be drawn from each city's general fund. This grant funding will enable the Peninsula WMG to install full capture systems for trash in catch basins throughout the Peninsula WMG area to complete the attainment of the final Santa Monica Bay Debris TMDL waste load allocations under an expedited schedule utilizing a single contracting mechanism. Enclosed is a revised version of Table 5-2, "TMDL and 303(d) WBPC Interim (I), Final (F) and Action (A) Compliance Milestones," from the Peninsula EWMP. An unrevised Table 5-2 is also included for your reference. The City of Rolling Hills Estates is also requesting text modifications in Section 3.2.1 of the Peninsula EWMP to update its approved implementation of the Santa Monica Bay Debris TMDL and the Machado Lake Trash TMDL to utilize a combined approach of full capture systems and institutional controls with monitoring to demonstrate compliance with waste load allocations—this change in approach does not affect the EWMP schedule.

**Justification for Requested Modification to EWMP Schedule**

To implement the Santa Monica Bay Marine Debris TMDL, the Peninsula WMG had originally planned to install full capture devices in a phased approach as described in the TMDL. However, a history of phased contracting for the installation of full capture trash devices for the implementation the Machado Lake Trash TMDL has shown that the most cost-effective way to

complete these installations is to contract this work in a single effort, not only for efficiency of staff time and cost but also in terms of schedule. To this end, the Peninsula agencies determined to jointly pursue grant funding to allow for the complete installation of full capture devices in Santa Monica Bay catch basins through a single coordinated effort.

On January 14, 2016, the City of Rancho Palos Verdes applied for Santa Monica Bay Prop 84 Grant Funding on behalf of the Peninsula WMG members for the Santa Monica Bay Catch Basin Insert Project to retrofit 1,300 catch basins within the Santa Monica Bay Watershed areas of the Cities of Rancho Palos Verdes, Palos Verdes Estates and Rolling Hills Estates. Although the anticipated award date by the Santa Monica Bay Restoration Commission (SMBRC) for this grant was May 2016, it was not until October 13, 2016, that the Santa Monica Bay Restoration Commission could meet to approve recommended projects for funding under the grant, including \$600,000 for the Peninsula WMG's Santa Monica Bay Catch Basin Insert Project. With additional time required for formal approval by the State Water Resources Control Board (SWRCB) consistent with Prop 84 requirements, and subsequent preparation of required submittals prerequisite to a grant agreement, the terms of the grant agreement were not completed until October 2017. Since the terms of the grant agreement do not allow reimbursable costs to be incurred prior to the grant start date (October, 1 2017), no substantial work could begin until the grant agreement was executed without jeopardizing the grant funding. These delays in the approval of funding and execution of the grant agreement have necessitated a change in the interim milestones identified in the Peninsula EWMP without affecting the final deadline for attainment of the waste load allocations under the Santa Monica Bay Debris TMDL.

#### **Schedule Change Requested [detailed discussion]**

The Peninsula WMG is proposing to revise *Table 5-2 TMDL and 303(d) WBPC Interim (I), Final (F) and Action (A) Compliance Milestones* to incorporate the needed modifications to the implementation schedule for the Santa Monica Bay Nearshore and Offshore Debris TMDL.

Specifically, the March 20, 2018 and 2019 milestones will be replaced by the following two action items:

- Execution of an MOU among project partners for implementation and cost-sharing of the Prop 84 Santa Monica Bay Restoration/Clean Beaches Santa Monica Bay Catch Basin Insert Project by August 20, 2018
- Complete 50% of full capture system installations by August 20, 2019

The final milestone of March 20, 2020 for achievement of 100% reduction in trash from baseline through the installation of full capture devices in all catch basins draining to the Santa Monica Bay will remain unchanged.

#### **Non-Structural/Institutional Control Measures for Trash**

The Peninsula WMG has been actively implementing non-structural targeted control measures identified in the Peninsula EWMP Section 3.2.2. Limited areas of Priority Land Uses (as defined by the recently adopted Statewide Trash Amendments) are found within the Santa Monica Bay Watershed on the Peninsula, and thus trash generation rates are relatively low when compared

with other more densely developed areas of the Santa Monica Bay Watershed. The following enhanced source control measures are being implemented by the Peninsula WMG to address trash:

***Clean Bay Certified*** annual inspections of food service establishments. The Clean Bay Certified (CBC) program for food service establishments sponsored by the Bay Foundation has received a letter of support from the Executive Officer of the Regional Board (June 6, 2016). The CBC program addresses a number of the priority water quality concerns including: trash, bacteria, and nutrients. Of the 43 individual CBC inspection checklist items, 10 are specifically related to prevention and control of trash.

***Increased Street Sweeping or Routes*** targeting priority land uses areas such as commercial areas.

- The City of Rancho Palos Verdes contracts for street sweeping twice per month throughout the entire city thus all streets are swept at a Priority A level. In addition, Western Avenue is swept weekly.
- The City of Palos Verdes Estates conducts street sweeping of commercial areas and arterial roads on a weekly basis. Commercial parking lots as well as the City's parking lots are also cleaned weekly.
- The City of Rolling Hills Estates contracts for street sweeping twice per month throughout the entire city thus all streets are swept at a Priority A level.

***Residential Trash BMPs*** are designed to prevent the dispersion of trash associated with wind and vectors.

- In Rolling Hills Estates and Rancho Palos Verdes, automated carts with hinged lids are provided by the cities' trash haulers for use by residents—use of these carts prevents wind-blown and vector scattering of trash.
- In Palos Verdes Estates, residential solid waste contractors enter private property to collect trash receptacles from containment areas, thus eliminating the need for receptacles to be left on the street for collection and reducing the likelihood of escaped litter.

***Construction site inspections*** include trash management checks. Training of construction inspectors has emphasized the importance of controlling trash as well as sediment-borne pollutants to target pollutants of concern in this watershed.

***Other Institutional Trash Control BMPs***

All three cities implement a variety of additional targeted institutional controls for trash such as:

- Palos Verdes Estates prohibits the use of top-loading trash trucks to reduce the amount of trash dispersed on city streets during trash collection. The City's residential

solid waste hauler is responsible for removal of any solid waste spilled on the ground during trash collection. Additionally, the City imposes fines on the trash hauler for any leaks and/or spills which occur during trash collection operations. Routine manual trash pickup in public rights-of-way is conducted through the City's landscaping contract. Litter is removed from trash containers at parks, ball fields, trails, and parking lots three times per week. The City has increased the number of trash receptacles along the pedestrian path running alongside Palos Verdes Drive North where frequent foot traffic occurs.

- Rolling Hills Estates implements routine manual trash pickup in public rights-of-way along arterial roads. Litter is removed from parks and trash cans are emptied as needed but no less than weekly.
- Four (4) Coastal Cleanup Day sites are hosted within the Palos Verdes Peninsula at: Abalone Cove and Point Vicente in Rancho Palos Verdes, and Malaga Cove and Lunada Bay in Palos Verdes Estates.

### **Requested Revision to Section 3.2.1 to Include Revised TMRP for the City of Rolling Hills Estates**

While implementing the planned installation of full capture devices for trash within the Machado Lake Watershed, the City of Rolling Hills Estates discovered a high frequency of non-standard catch basins and sump conditions which made installation of full capture devices infeasible in some areas. After discussions with Regional Board staff, the City submitted a revised Trash Monitoring and Reporting Plan (TMRP) to the Regional Board on November 30, 2016 to address both the Santa Monica Bay and Machado Lake TMDLs. The revised TMRP utilizes a combined approach to demonstrate compliance with waste load allocations for trash through the installation of full capture systems in catch basins in the commercial and high-density residential areas of the City, and a comprehensive program of institutional controls and Minimum Frequency of Assessment and Collection (MFAC) in other land use areas where installation of full capture devices is not technically feasible. The revised TMRP was approved by Regional Board staff on January 20, 2017, and the City has initiated MFAC monitoring in accordance with the revised TMRP. The City of Rolling Hills Estates will also participate in the Prop 84 Santa Monica Bay Catch Basin Insert Project to install full capture devices in catch basins within the Santa Monica Bay watershed of the city wherever it is feasible to do so.

The attached text modifications are proposed in Section 3.2.1 of the Peninsula EWMP to update the description of City of Rolling Hills Estates' implementation of the Santa Monica Bay Debris TMDL and the Machado Lake Trash TMDL to utilize a combined approach of full capture systems and institutional controls with monitoring to demonstrate compliance with waste load allocations—this change in approach does not affect the EWMP schedule.

Upon approval of the aforementioned EWMP modifications (schedule changes and textual revision), the Peninsula EWMP will be revised to incorporate the approved changes.

If you have any questions, please contact me at (310) 544-5335 or your staff may contact Mr. Charles Eder at (310) 544-5282 and [CharlesE@rpvca.gov](mailto:CharlesE@rpvca.gov).

Sincerely,



Elias Sassoon

Director of Public Works

City of Rancho Palos Verdes

Copies:

City of Palos Verdes Estates

City of Rolling Hills Estates

County of Los Angeles

Attachments:

Peninsula EWMP Section 3.2.1 and Table 5-2 (revised)

Peninsula EWMP Section 3.2.1 and Table 5-2 (unrevised)

Attachment A  
Peninsula EWMP Section 3.2.1 and  
Table 5-2 (revised)

### 3.2.1 CONTROL MEASURES IDENTIFIED IN TMDLS/IMPLEMENTATION PLANS

This section describes the nonstructural control measures that have been previously identified in TMDLs and corresponding implementation plans and the status of their implementation. For those TMDLs that do not sufficiently identify control measures, or if implementation plans have not yet been developed, control measures are identified in the planned Targeted Control Measures as described in the following sections in this chapter. For more information on the TMDLs refer to Section 2: Water Quality Priorities.

#### SANTA MONICA BAY BEACHES BACTERIA TMDL

To meet the requirements of Santa Monica Bay Beaches Bacteria TMDL, a Coordinated Shoreline Monitoring Plan (CSMP) was developed by a committee of responsible agencies, including representatives from the Peninsula WMG. The Peninsula WMG monitoring sites historically experience fewer exceedance days than used in the TMDL, and are therefore in an anti-degradation condition<sup>1</sup>. As a result, control measures in the approved Implementation Plan include continued implementation of MCMs to protect or enhance existing water quality, and investigation when an excessive number of exceedances occurs at a monitoring site.

#### SANTA MONICA BAY NEARSHORE AND OFFSHORE DEBRIS TMDL

Compliance with the Santa Monica Bay Debris TMDL is based on installation of structural best management practices such as full capture or partial capture systems, institutional controls, or any best management practices, to attain a progressive reduction in the amount of trash in the Santa Monica Bay<sup>2</sup>. The ~~agencies within the Peninsula WMG~~[Cities of Rancho Palos Verdes and Palos Verdes Estates](#) have chosen to comply through the installation of full capture devices in catch basins draining to Santa Monica Bay. ~~These devices are being installed in accordance with the compliance schedule outlined to meet the final WLA compliance deadline~~ in the TMDL<sup>3</sup>. [The City of Rolling Hills Estates has submitted and received approval for a revised Trash Monitoring and Reporting Plan utilizing a combined approach to demonstrate compliance with waste load allocations for trash in both the Santa Monica Bay and Machado Lake TMDLs through the completed installation of full capture systems in 100% of the catch basins in the commercial and high-density residential areas of the City, and a comprehensive program of institutional controls and Minimum Frequency of Assessment and Collection \(MFAC\) in other land use areas where installation of full capture devices is not technically feasible.](#)

#### SANTA MONICA BAY DDT & PCBs TMDL

The MS4 Permit requires routine stormwater sampling at mass emissions stations throughout LA County. Sampling is conducted by the Los Angeles County Department of Public Works, and typically includes four wet-weather events and four dry-weather events per year at these mass emission stations. In the Santa Monica Bay Watershed, the Ballona Creek and Malibu Creek mass emission stations are the two closest to the Peninsula EWMP area. Neither of these stations has detected DDT or PCBs since the mid-90s<sup>4</sup>.

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<sup>1</sup> The antidegradation policy applies to waters that are determined to have high water quality and requires that existing high quality be maintained.

<sup>3</sup> [Reconsideration of the TMDL or the WQBEL in the Permit to conform to the Statewide Trash Policy would result in a modification to the implementation of these control measures.](#)

<sup>4</sup> According to the Santa Monica Bay DDT and PCBs TMDL, there were no detectable concentrations of DDT in stormwater samples from 1994 to 2005 (LADPW, 2005). Similar results were found for DDT in Malibu (1997 to 2005); Los Angeles Department of Public Works (LADPW) has not indicated detectable levels of PCBs in stormwater from Ballona or Malibu since the mid 1990s. The detection levels used in the LA County Mass Emission sampling are 2 & 3 orders of magnitude larger than the California Ocean Plan human health criteria for DDT and PCBs respectively.

Estimated stormwater loads from Santa Monica Bay watersheds were found to be lower than TMDL calculated allowable loads to achieve sediment targets; therefore, the waste load allocations for DDT and PCBs are based on existing load estimates, and the MS4 dischargers are essentially in an anti-degradation condition<sup>5</sup>.

### **MACHADO LAKE TRASH TMDL**

There are two alternatives for responsible jurisdictions to achieve compliance with waste load allocations in the Machado Lake Trash TMDL, either implement full capture systems or implement a Minimum Frequency of Assessment and Collection (MFAC) program. The agencies within the Peninsula WMG have chosen to comply through the installation of full capture devices in catch basins draining to Machado Lake. These devices are being installed in accordance with the compliance schedule outlined in the TMDL<sup>6</sup>. [The City of Rolling Hills Estates has submitted and received approval for a revised Trash Monitoring and Reporting Plan utilizing a combined approach to demonstrate compliance with waste load allocations for trash in both the Santa Monica Bay and Machado Lake TMDLs through the completed installation of full capture systems in 100% of the catch basins in the commercial and high-density residential areas of the City, and a comprehensive program of institutional controls and Minimum Frequency of Assessment and Collection \(MFAC\) in other land use areas where installation of full capture devices is not technically feasible.](#)

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<sup>5</sup> USEPA: Santa Monica Bay DDT and PCBs TMDL

<sup>6</sup> Reconsideration of the TMDL or the WQBEL in the Permit to conform to the Statewide Trash Policy would result in a modification to the implementation of these control measures.

Table 5-2: TMDL and 303(d) WBPC Interim (I), Final (F), and Action (A) Compliance Milestones.

TMDL/ 303(d)	Segments	Constituents	Compliance Goal	Weather Condition	Dates and Milestones										
					2012	2013	2014	2015	2016	2017*	2018	2019	2020	2032	2040
Santa Monica Bay Beaches Bacteria	Abalone Cove Bluff Cove Inspiration Point Long Point Malaga Cove Portuguese Bend	Total Coliform Fecal Coliform Enterococcus	Compliance with Total Allowable Exceedance Days	Winter Dry	12/28 F	-	-	-	-	-	-	-	-	-	-
				Summer Dry	12/28 F	-	-	-	-	-	-	-	-	-	
				Wet	12/28 F	-	-	-	-	-	-	-	-	-	
Santa Monica Bay Nearshore and Offshore Debris	All	Trash Plastic Pellets	% Reduction in Trash from Baseline	Wet and Dry	-	-	-	-	3/20 20%	3/20 40%	3/20 60% 8/20 A	3/20 80% 8/20 A	3/20 100%	-	-
Santa Monica Bay DDT & PCBs	Abalone Cove Bluff Cove	DDT PCBs	Meet WLAs	Wet and Dry	-	-	-	-	-	12/28 A	-	-	-	-	-
Machado Lake Trash	All	Trash	% Reduction in Trash from Baseline	Wet and Dry	3/6 20%	3/6 40%	3/6 60%	3/6 80%	3/6 100%	-	-	-	-	-	-
Machado Lake Pesticides and PCBs	All	Chlordane Dieldrin PCBs DDT	Meet WQBELs	Wet and Dry	-	-	-	-	-	12/28 A	-	9/30 F	-	-	-
Machado Lake Nutrient	All	Algae Total Nitrogen Total Phosphorus Ammonia Chlorophyll a Dissolved Oxygen Odor	Meet WLA	Wet and Dry	-	-	3/11 I	-	-	-	9/11 F	-	-	-	-
Long Beach and Greater LA Harbor Toxics	Inner Harbor Fish Harbor Outer Harbor Cabrillo Marina	DDT PCBs Copper Lead Zinc Mercury PAHs Chlordane	Meet WLA	Wet and Dry	12/28 I	-	-	-	-	-	12/28 A (Mercury & Chlordane)	-	-	-	3/23 F
303(d)	Wilmington Drain	Coliform Bacteria	Determine allowable exceedance days	Wet and Dry	-	-	-	1/30 & 6/28 A	7/1 A	1/30 A	12/28 A	12/28 A	-	-	6/28 F

Attachment B  
Peninsula EWMP Section 3.2.1 and  
Table 5-2 (unrevised)

## 3.2. TARGETED CONTROL MEASURES

Targeted Control Measures (TCMs) are additional control measures beyond the baseline MCMs and NSWDC measures of the MS4 Permit that are intended to target the Peninsula WMG's WQPs. TCMs may be divided into two categories: nonstructural and structural. The selection of structural and nonstructural control measures to address WQPs within the Peninsula WMG is a vital component of the EWMP planning process.

The Participating Agencies have already proposed and implemented a number of structural and nonstructural control measures in the watershed that collectively may contribute to considerable pollutant load reductions. These existing and planned WCMs provide a head start in the planning process to address WQPs within the Peninsula WMG. There are many different types of structural and nonstructural control measures that provide varying benefits from their implementation. The following sections describe Planned TCMs to be implemented, Potential TCMs that may be implemented (implementation is conditional upon factors such as site constraints, governing body approval, etc.) as well types of structural BMPs available to the Peninsula WMG.

### 3.2.1. CONTROL MEASURES IDENTIFIED IN TMDLS/IMPLEMENTATION PLANS

This section describes the nonstructural control measures that have been previously identified in TMDLs and corresponding implementation plans and the status of their implementation. For those TMDLs that do not sufficiently identify control measures, or if implementation plans have not yet been developed, control measures are identified in the planned Targeted Control Measures as described in the following sections in this chapter. For more information on the TMDLs refer to Section 2: Water Quality Priorities.

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Compliance with the Santa Monica Bay Debris TMDL is based on installation of structural best management practices such as full capture or partial capture systems, institutional controls, or any best management practices, to attain a progressive reduction in the amount of trash in the Santa Monica Bay<sup>5</sup>. The agencies within the Peninsula WMG have chosen to comply through the installation of full capture devices in catch basins draining to Santa Monica Bay. These devices are being installed in accordance with the compliance schedule outlined in the TMDL<sup>6</sup>.

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<sup>4</sup> The antidegradation policy applies to waters that are determined to have high water quality and requires that existing high quality be maintained.

<sup>6</sup> Reconsideration of the TMDL or the WQBEL in the Permit to conform to the Statewide Trash Policy would result in a modification to the implementation of these control measures.

### **SANTA MONICA BAY DDT & PCBs TMDL**

The MS4 Permit requires routine stormwater sampling at mass emissions stations throughout LA County. Sampling is conducted by the Los Angeles County Department of Public Works, and typically includes four wet-weather events and four dry-weather events per year at these mass emission stations. In the Santa Monica Bay Watershed, the Ballona Creek and Malibu Creek mass emission stations are the two closest to the Peninsula EWMP area. Neither of these stations has detected DDT or PCBs since the mid-90s<sup>7</sup>.

Estimated stormwater loads from Santa Monica Bay watersheds were found to be lower than TMDL calculated allowable loads to achieve sediment targets; therefore, the waste load allocations for DDT and PCBs are based on existing load estimates, and the MS4 dischargers are essentially in an anti-degradation condition<sup>8</sup>.

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<sup>7</sup> According to the Santa Monica Bay DDT and PCBs TMDL, there were no detectable concentrations of DDT in stormwater samples from 1994 to 2005 (LADPW, 2005). Similar results were found for DDT in Malibu (1997 to 2005); Los Angeles Department of Public Works (LADPW) has not indicated detectable levels of PCBs in stormwater from Ballona or Malibu since the mid 1990s. The detection levels used in the LA County Mass Emission sampling are 2 & 3 orders of magnitude larger than the California Ocean Plan human health criteria for DDT and PCBs respectively.

<sup>8</sup> USEPA: Santa Monica Bay DDT and PCBs TMDL

<sup>9</sup> Reconsideration of the TMDL or the WQBEL in the Permit to conform to the Statewide Trash Policy would result in a modification to the implementation of these control measures.

Palos Verdes Peninsula

Enhanced Watershed Management Program

Table 5-2: TMDL and 303(d) WBPC Interim (I), Final (F), and Action (A) Compliance Milestones.

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	Bluff Cove			Summer Dry	12/28 F	-	-	-	-	-	-	-	-	-	-
	Inspiration Point Long Point Malaga Cove Portuguese Bend			Wet	12/28 F	-	-	-	-	-	-	-	-	-	-
Santa Monica Bay Nearshore and Offshore Debris	All	Trash Plastic Pellets	% Reduction in Trash from Baseline	Wet and Dry	-	-	-	-	3/20 20%	3/20 40%	3/20 60%	3/20 80%	3/20 100%	-	-
Santa Monica Bay DDT & PCBs	Abalone Cove Bluff Cove	DDT PCBs	Meet WLAs	Wet and Dry	-	-	-	-	-	12/28 A	-	-	-	-	-
Machado Lake Trash	All	Trash	% Reduction in Trash from Baseline	Wet and Dry	3/6 20%	3/6 40%	3/6 60%	3/6 80%	3/6 100%	-	-	-	-	-	-
Machado Lake Pesticides and PCBs	All	Chlordane Dieldrin PCBs DDT	Meet WQBELs	Wet and Dry	-	-	-	-	-	12/28 A	-	9/30 F	-	-	-
Machado Lake Nutrient	All	Algae Total Nitrogen Total Phosphorus Ammonia Chlorophyll a Dissolved Oxygen Odor	Meet WLA	Wet and Dry	-	-	3/11 I	-	-	-	9/11 F	-	-	-	-
Long Beach and Greater LA Harbor Toxics	Inner Harbor Fish Harbor Outer Harbor Cabrillo Marina	DDT PCBs Copper Lead Zinc Mercury PAHs Chlordane	Meet WLA	Wet and Dry	12/28 I	-	-	-	-	12/28 A (Mercury & Chlordane)	-	-	-	3/23 F	-
303(d)	Wilmington Drain	Coliform Bacteria	Determine allowable exceedance days	Wet and Dry	-	-	-	1/30 & 6/28 A	7/1 A	1/30 A	12/28 A	12/28 A	-	-	6/28 F