

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

LOS ANGELES REGION

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600



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July 5, 1996

Dear Councilmember:

Redondo Beach Councilmember Joseph Dawidziak recently authored a communication on Southern California Association of Governments (SCAG) letterhead which you may have received regarding the proposed revisions to the Los Angeles municipal storm water permit. Representatives of several cities called this office expressing their concern at the misinformation it contained. In addition, staff of SCAG called to apologize, indicating that the letter in no way represented SCAG policy, and was not authorized by SCAG.

In order to correct any misunderstanding on the content of the storm water permit, I suggested to SCAG officials that I would provide a fact sheet (enclosed) which provides accurate and current information on the claims made in Councilmember Dawidziak's letter.

The Regional Water Quality Control Board has made an unprecedented effort to develop with municipalities a workable storm water program in Los Angeles County. From the first, staff has been committed to the premise that only through understanding and incorporating the interests of the stakeholders could sound public policy be achieved.

The permit is the result of 18 months of discussions with affected parties, and countless meetings to hammer out differences, including even those arising from alternative municipal perspectives. Great care was taken to thoroughly review comments received from municipalities in January on the first complete draft mailed to cities in December, and to make responsive changes to the permit as evidenced in the May tentative permit. Based on comments received through the end of June, staff has continued to make language modifications to assure that all reasonable concerns are accommodated.

Councilmember Dawidziak's expressed concern for water quality and environmental protection is commendable. In that light, it is particularly unfortunate that he should have distributed such inaccurate information about the substance of the storm water permit and the permit process.

Please find attached a fact sheet addressing the points raised in Councilmember Dawidziak's letter. Please call me, at (213)266-7515, or Winnie Jesena of my staff, at (213)266-7594 if you should have any questions.

Thank you for your attention to these concerns.

Sincerely,

*Catherine Tyrrell*

CATHERINE TYRRELL  
Assistant Executive Officer

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**PERMIT FACT SHEET**

- An analysis of costs to cities by the San Gabriel Valley Association of Governments was compared to an analysis of storm water program costs in municipalities throughout California. The comparison showed local costs to be at or below the average in the state.
- The Clean Water Act does not mandate that the County be a Principal Permittee. The Clean Water Act requires that municipalities (the owners/operators of the storm drain system) be issued a permit by the State on behalf of the USEPA. Because storm drains connect from one jurisdiction to another operating as an interconnected system, the county volunteered to be the Principal Permittee and to manage the countywide monitoring program. This saves each of the other permittees from paying the annual \$10,000 permit fee and the cost of the monitoring program. The County does not have the authority to operate and manage individual city storm drain systems, nor control activities in cities that will reduce pollutant inputs to the storm drain system - only cities have that authority.
- The Principal Permittee and Co-Permittees filed a report of waste discharge with the Regional Water Board in December 1994; the Regional Water Quality Control Board has worked with County Public Works and the other municipal contacts as identified through that process. Elected officials have never been identified as permittee contact persons in any city. It would be inappropriate for Regional Board staff to go over the heads of identified municipal staff. However, whenever requested, Regional Board staff has been available to meet with elected officials. Regional Board staff has also provided technical assistance to the elected officials of the Santa Monica Bay Restoration Project who prepared a video directed to elected officials on the permit. The SMBRP also prepared a short policy version of the permit which was sent out to each city council.
- The permit breaks away from the traditional command-and-control model of regulation allowing the principal permittee, along with municipalities, to develop the programs they will implement. This is the approach that cities have said they desire. The permit simply establishes timeframes (which have been modified to meet the schedules cities indicated they needed) for the development of individual elements of the storm water management program. Public review is, indeed, incorporated at multiple points into the storm water program development process.
- The permit has been written such that, if a permittee is implementing the provisions of the permit, they will not be exposed to third party lawsuits. A number of modifications have been made to accomplish this objective. However, the Clean Water Act specifically allows for citizen lawsuits if the permittee is in violation of the permit. The Regional Board has no power to change this provision of the Clean Water Act.

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- In our discussions with the Restaurant Association, leading fast food restaurant operators, and with the Western States Petroleum Association (WSPA), we have been told that the activities called for in the permit are consistent with already established policies and procedures in the industry. Given the experience of cities already operating business outreach education programs, and changes in the permit which emphasize piggybacking on existing programs, we do not see significant cost impacts for these businesses.

- Municipal permits must contain receiving water limitations language and all permits adopted in the last year in the state do so. Those adopted most recently for Orange County and Sacramento County contain language that Los Angeles County municipalities have found objectionable. Under the Clean Water Act, municipalities, as the owners/operators of the storm drain system, are responsible for the quality of waters in the system and must use their unique municipal powers - not possessed by the Regional Water Board or the County or any one else - to assure that receiving water limitations - at the point of discharge to the storm drain system - are met. Because it is widely recognized that such receiving water limitations would not be met - that there is indeed a water quality problem - the receiving water limitations section of the permit has been written such that implementation of the permit's provisions is the equivalent of compliance with the receiving water limitations. When municipalities file for a renewal in another five years, they must determine whether any additional actions are necessary to attain receiving water limitations.

- The permit does not require cities to carry out any actions which are the responsibility of the Regional Board. However, every effort has been made to eliminate duplicate inspections for essentially the same purposes by state and local government, and to create complementary efforts between municipalities and between different levels of government. We believe such efforts to be good public policy.

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State of California  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

101 Centre Plaza Drive  
Monterey Park, California 91754  
(213) 268-7500

Public Notice No. 96-027  
Meeting - July 15, 1996  
NPDES NO. CAS614001

**PUBLIC NOTICE**  
(Govt Code Section 11125)

**CHANGE OF MEETING LOCATION AND TIME**

The California Regional Water Quality Control Board regular meeting on July 15, 1996, was previously noticed (Public Notice No. 96-025) to be held at the County of Los Angeles Supervisors Hearing Room.

The location and starting time for that meeting have been changed as follows:

Place: Junipero Serra State Office Building  
Auditorium (Room #1138)  
107 South Broadway  
Los Angeles, California

Starting Time: 8:00 a.m.

The public hearing to consider the Los Angeles County Municipal Storm Water Discharge Permit will begin no sooner than 10:30 a.m.

Please direct any questions to Carlos Urrunaga, Environmental Specialist III, at (213) 268-7598.

Date: 05 July 1996

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION



47 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX (213) 266-7600

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July 5, 1996

California Newspaper Service  
Bureau, Incorporated  
P.O. Box 54310  
Los Angeles, CA 90054

GOVERNMENT ACCOUNTS (FILE NO. 100.324)

Enclosed is a copy of a public notice we would like published in a daily newspaper of general circulation in the geographical area of each discharge for one day as soon as possible but not later than July 7, 1996.

The notice as published in each newspaper must contain the applicable non-tabular material and is to list only those tabulated discharges located within the geographical area served by that specific newspaper.

**We rely on your proofreading.**

Please bill us in triplicate and provide us with three copies of affidavit of publication (Attention: Pat Guokas).

If you have any questions, please call me at (213) 266-7594.

WINNIE D. JESENA  
Senior Water Resource  
Control Engineer

Enclosure

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State of California  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

101 Centre Plaza Drive  
Monterey Park, California 91754  
(213) 266-7500

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Date: 05 July 1996

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State of California  
Environmental Protection Agency  
M e m o r a n d u m

To: Bette Worthman  
SCAG

Date: July 5, 1996

*Catherine*  
From: Catherine Tyrrell, AEO  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD-LOS ANGELES REGION  
101 Centre Plaza Drive, Monterey Park, CA 91754-2156  
Telephone: (213) 266-7515

Subject: Changes to L.A. County Municipal Storm Water Permit Requested By  
SGVCOG at July 1 meeting

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As promised, please find attached the changes to the legal authority section of the permit. SGVCOG cities asked for assurances that the permit would not require them to carry out routine inspections of residential private property. The attached language provides such certainty.

I've also attached the letter and fact sheet mailed to all cities in response to the letter authored by a councilman in Redondo Beach on SCAG letterhead. As we discussed, the SCAG letter contains a number of inaccurate, misleading statements about the permit. The fact sheet provides the correct information.

Please call me at (213)266-7515 if I can answer any additional questions.

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E. Legal Authority

1. Pursuant to the time frame ~~set forth~~ established in E.2, each Permittee shall demonstrate that it possesses legal authority necessary to control discharges to and from those portions of the MS4 over which it has jurisdiction so as to comply with this Order. This legal authority may be demonstrated by either a single ordinance or a single guidance document containing all the applicable statutes, ordinances, permits, contracts, orders or agreements which govern a Permittee's storm water management activities, as required by 40 CFR 122.26(d)(2)(i).

Each Permittee shall either individually or collectively possess the legal authority to:

- a. Control the contribution of pollutants to the MS4 by storm water discharges associated with industrial activity and the quality of storm water discharged from sites of industrial activity, unless permitted under a separate NPDES permit, through the following prohibitions and requirements:
  - i. Prohibit the discharge of untreated wash waters to the MS4 when gas stations, auto repair garages, or similar ~~use other types of automotive service facilities are cleaned~~;
  - ii. Prohibit the discharge of untreated wastewater to the MS4 from mobile auto washing, steam cleaning, mobile carpet cleaning, and other such mobile commercial and industrial operations;
  - iii. Prohibit to the maximum extent practicable, discharges to the MS4 from areas where repair of machinery and equipment, including motor vehicles, which are visibly leaking oil, fluid or antifreeze is undertaken;
  - iv. Prohibit the discharges of untreated runoff to the MS4 from storage areas of materials containing grease, oil, or other hazardous substances, ~~(e.g., motor vehicle parts)~~ and unsealed uncovered receptacles containing hazardous materials;
  - v. Prohibit the discharge of commercial/municipal swimming pool filter backwash to the MS4;
  - vi. Prohibit the discharge of untreated runoff from the washing of toxic materials from paved or unpaved areas which results in

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~~a discharge to the MS4;~~

- vii. Prohibit or control to the maximum extent practicable washing impervious surfaces in industrial/commercial areas which results in a discharge of untreated runoff to the MS4, unless specifically required by State or local health and safety codes ~~or permitted under a separate NPDES permit;~~
  - viii. Prohibit the washing out of concrete trucks ~~into storm drains to the MS4;~~
  - ix. Require regular sweeping or other equally effective measures to remove debris from industrial/commercial motor vehicle parking lots with more than twenty-five parking spaces that are located in areas potentially exposed to storm water; and,
  - x. Require the use of BMPs for or placement of machinery/equipment that is to be repaired or maintained ~~in areas susceptible to or exposed to storm water, in a manner where~~ such that leaks, spills and other maintenance related pollutants are not discharged to the MS4;
- b. Prohibit illicit discharges and illicit connections to the MS4 and require removal of illicit connections.
- c. ~~Control the discharge of spills and the dumping or disposal of materials other than storm water to the MS4 through the following prohibitions or requirements:~~  
Control spills, dumping, or disposal of materials, including the following, to the MS4 through the following prohibitions:
- i. Prohibit littering;
  - ii. Prohibit the disposal of leaves, dirt, or other landscape debris into a storm drain;
  - iii. Prohibit the use discharge to the MS4 of any pesticide, fungicide, or herbicide banned; ~~the use of which is prohibited~~ by the USEPA or the California Department of Pesticide Regulation;
  - iv. ~~Require proper~~ Prohibit the disposal of food wastes in such a manner likely to cause them to enter the MS4; ~~by the food service and food distribution industry;~~

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- v. ~~Require disposal~~ Prohibit the disposal of hazardous wastes at appropriate disposal sites and not in trash containers used for municipal trash disposal, which could result in a discharge to the MS4; and
- vi. ~~Require removal and proper disposal of all~~ Prohibit the placement of fuels, and chemicals residue, fuel and chemical wastes, animal wastes, garbage, batteries, and or other materials types of which have potentially harmful adverse impacts on water quality materials which are located in areas susceptible to, or exposed to, in areas exposed to storm water.

\* Added per  
request of  
SGVCOG

The above requirements (Part 2.I.E.1) do not require inspection of private residential property. Legal authority is necessary, however, so that if the Permittee becomes aware of situations associated with private residential property that cause obvious discharges of prohibited materials to the MS4 or pose the potential for such discharges, the Permittee has the legal authority to abate such discharges.

- ~~d. Control, through interagency or inter-jurisdictional agreements among Permittees or any other alternative means, the discharge of pollutants from one portion of the MS4 to another.~~
- ed. Require compliance with conditions in ordinances, permits, contracts, or orders adopted and/or issued by the Permittee in compliance with this Order, and with requirements of this Order; and
- ~~f. Conduct inspection, surveillance, and/or monitoring procedures necessary to determine compliance or noncompliance with permit conditions including the prohibition on illicit discharges to the MS4.~~

2. Each Permittee shall:

- a. Provide to the Principal Permittee for submittal to the Regional Board Executive Officer, not later than 120 days after the adoption of this Order copies of ordinances, regulations, and other legal documents establishing legal authority, or in the alternative:
  - ia. A statement by its representative legal counsel that the Permittee has obtained all necessary legal authority to comply with this Order, referencing that legal authority with specificity; and/or



Los Angeles County Municipal Storm Water Permit  
Order No. 96-XXX

CAS814001

ii. If Part 2.1.E.2.a.i. is only partially fulfilled, a timely schedule for obtaining adequate legal authority to comply with this Order, enumerating, with specificity, the legal authority that remains to be obtained.

~~b. Exercise full legal authority within its jurisdiction to require compliance with this Order, the CSWMP, and/or the WMAPs.~~

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

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(213) 266-7500  
FAX: (213) 266-7400



July 3, 1996

The Honorable Dominic L. Cortese  
Member of the State Assembly  
State Capitol, Room 6031  
10th & L Streets  
Sacramento, CA 95814

Dear Assemblyman Cortese,

I appreciate the opportunity to send to you the enclosed information regarding the Los Angeles Municipal Storm Permit. As you know, the Permit is up for consideration by the Los Angeles Regional Water Quality Control Board on July 15.

For the past 18 months, members of our Regional Board staff have worked with representatives from 85 cities in Los Angeles County to address their concerns regarding the Permit. It has been a long and arduous process, but we believe that we have been successful in addressing those concerns. The Permit has been widely reviewed and requires similar actions included in other storm water permits in effect throughout the State. In fact, a comparative analysis of costs of similar programs throughout the State indicated that the cost of *this* program is below the middle range.

We received a number of comments on the May 23 revised Permit and are currently in the process of incorporating changes to the Permit to address the additional concerns raised in those comments.

This package contains four types of information: 1) the May 1996 revised Permit, cover letter, and response-to-comments package sent to all L.A. County cities on May 23, 1996, along with letters sent to others in response to comments; 2) samples of community comment letters received by the Regional Board; 3) information developed by the State Board on cost and benefits, and 4) a summary of the recently released epidemiology study of Santa Monica Bay, conducted by the Santa Monica Bay Restoration Project.

I hope you will not hesitate to contact me if you have any questions regarding the Permit in general or the enclosed materials in particular. Again, please accept my thanks and appreciation for your interest in this most important effort to reduce storm water pollution in our coastal waters.

Sincerely,

Catherine Tyrrell  
Assistant Executive Officer

Enclosures

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
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(213) 266-7500  
FAX (213) 266-7600



June 28, 1996

Dear Mayor and City Council Members:

At the suggestion of the Southern California Association of Governments (SCAG) Energy and Environment Committee, I am writing to encourage your participation in reviewing the Los Angeles County Municipal Storm Water NPDES Permit sent to your staff in late May. Based on cities' comments on the December draft, Regional Board staff revised the permit substantially to address the concerns raised.

A short summary of the permit is attached along with the full permit and original cover letter. The summary and a short video on the permit were sent to you approximately two weeks ago. The video was developed under the leadership of two local elected officials who work professionally in the communications field. We urge you to show the video at your upcoming council meeting.

SCAG officials expressed the concern that the permit review process did not include enough opportunities for elected official involvement. It is important to note that the USEPA determined the storm water policy direction and regulatory framework a number of years ago. This Regional Board is charged with implementing that policy direction in Los Angeles County through the issuance of the municipal storm water permit. However, there are opportunities for elected officials to both comment on the permit and to become involved in the permit implementation process.

On July 15, 1996, the Regional Board will hold a hearing on the permit at the L.A. County Board of Supervisors Hearing Room at 9:00 a.m.. Elected officials are encouraged to participate in the hearing process. Time will be set aside during the hearing specifically for you as elected officials.

Within the permit itself, however, there are also opportunities for shaping the approach cities will take to implement the permit requirements. The County of Los Angeles is charged with lead responsibility for many activities within the permit. The County is required to involve the municipalities in developing these programs. City representatives will participate in various watershed committees and some will be chosen by their peers to participate on an Executive Advisory

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Mayor and City Council Members  
June 28, 1996  
Page Two

Committee. We encourage your involvement directly on these committees or through the direction you give to your technical staff.

Please let us know if there are any other questions you may have. We very much want to work cooperatively with you to accomplish our mutual goal of protecting water quality in this region.

Sincerely,

*Robert P. Ghirelli*

Robert P. Ghirelli, D.Env.  
Executive Officer

cc: Judy Mikels, SCAG EEC Chair

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-3156  
(713) 266-7300  
FAX: (713) 266-7600



June 28, 1996

Ms. Beatrice J.S. LaPisto-Kirtley  
President  
San Gabriel Valley Council of Governments  
234 North El Molino Avenue  
Suite 202  
Pasadena, CA 91101-1675

**PROPOSED COUNTY OF LOS ANGELES MUNICIPAL NPDES STORM WATER DISCHARGE PERMIT**

Your letter of April 26, 1996 expresses concerns raised by members of the San Gabriel Valley Council of Governments (SGVCOG) in regards to provisions of the proposed December 1995 draft of the County of Los Angeles NPDES Municipal Storm Water Discharge Permit. The issues raised include costs of implementation to the municipalities of the San Gabriel Valley, a lack of information regarding storm water pollution, and potential litigation due to the Receiving Water Limitations.

Many changes have been made to the December draft in response to your and other municipalities' concerns and are incorporated into the tentative permit mailed to all cities in May. Additionally, Regional Board staff is making further refinements in response to the comments received through June 26, 1996.

As background, it is important to note that the NPDES storm water program is a federal program created by Congress in 1987 by amending the Clean Water Act. Subsequent federal regulations were promulgated in 1990 by the United States Environmental Protection Agency (USEPA) that created the requirements of the storm water program. The program is administered in the State of California by the State Water Resources Control Board and its nine Regional Boards.

We very much appreciated the fact that the Council of Governments took the time to survey member cities regarding the cost of permit implementation. Staff from the Santa Monica Bay Restoration Project worked with your municipalities to better understand how costs were derived, and to compare the costs with those of other municipalities implementing storm water protection programs around the state. Based on these comparisons, it appears that the costs (on a per capita basis) you provided are good working estimates equal to or slightly less than those of other programs in the State.

Additionally, Regional Board staff worked hard to reduce costs of implementing the permit as we made changes to the December draft. Costs were reduced in two key areas: 1) industrial inspection programs were changed to educational site visits and fewer visits were required, 2) watershed monitoring/pilot projects by cities (over and above the monitoring program carried out by the County) were eliminated.

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Ms. Beatrice J.S. LaPisto-Kirtley  
June 28, 1996  
Page 2

Regarding the availability of information on storm water pollution, a USEPA study concluded in 1983 (Nationwide Urban Runoff Program) showed that pollutants are prevalent in urban runoff throughout the nation. The results of this study, among others, helped identify the need for storm water management, and compelled the U.S. Congress in 1987, to create a permitting structure for industrial activities and municipalities under the federal Clean Water Act. Additionally, there have been numerous beach closures along LA County beaches due to urban runoff pollution. As recently as last month, an epidemiological study was completed by the Santa Monica Bay Restoration Project showing a correlation between illness among people bathing in LA County beaches and proximity to storm drain runoff. To add to existing water quality data, the County of Los Angeles is embarking upon a monitoring program which will help to better determine pollutant loadings and where these pollutants come from. This will go a long way towards directing educational efforts for the future.

The Receiving Water Limitations have been rewritten due to comments received by this Regional Board. The tentative Permit clearly states that "a Permittee will not be in violation of the Receiving Water Limitations so long as they are in compliance with the Storm Water Management Program Requirements set forth in this Order...". In other words, as long as a municipality is carrying out its plan of action, it will be deemed in compliance with the receiving water limitations. Revised language addressing the concerns of cities was mailed to permittees under separate cover (attached).

The Regional Board and its staff are committed to working with the Permittees and other stakeholders to attain and protect the beneficial uses of receiving waters in the Region in a cost-effective manner. The Board meeting to consider the permit will be held on July 15, 1996. For additional details on the hearing, or if you should have any questions or would like to discuss these issues further, please do not hesitate to call me at (213) 266-7510 or Catherine Tyrrell at (213) 266-7515, or alternatively, your staff can call Winnie Jesena at (213) 266-7594 or Carlos Urrunaga at (213) 266-7598.

*Robert P. Ghirelli*

ROBERT P. GHIRELLI, D.Env.  
Executive Officer

cc: Jorge León, Office of the Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhiman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
John Caffrey, Chair, State Water Resources Control Board

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

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June 28, 1998

Ms. Amy L. Glad  
Executive Vice President  
Building Industry Association of Southern California, Inc.  
1330 S. Valley Vista Drive  
Diamond Bar, CA 91765

**TENTATIVE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
MUNICIPAL STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY  
(NPDES No. CAS614001, CI 6948)**

We received your letter of January 26, 1998, addressed to Board Chairman Mr. Keston, wherein you expressed concerns raised by members of the Building Industry Association of Southern California on the subject permit. As you have indicated in your letter of June 24, 1998, we already addressed the major concerns in the May 23 tentative permit. We appreciate and will consider the recommended language changes as well as the remaining concerns you indicated in your June 24 letter.

Thank you for working cooperatively with our staff in developing a manageable and cost-effective program on development planning and construction, and we look forward to continue working with you towards adoption and implementation of the storm water program.

If you should have any questions or comments in regards to this letter or the permit in general, please do not hesitate to contact me at (213) 266-7510 or Catherine Tyrrell at (213) 266-7515. Also, feel free to call Winnie Jesena at (213) 266-7594, or Xavier Swamikannu at (213) 266-7592, or Carlos Urrunaga at (213) 266-7598.

*Robert P. Ghirelli*

ROBERT P. GHIRELLI, D. Env.  
Executive Officer

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



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June 21, 1996

Mr. Michael Kantor  
Stormwater Management Division  
Board of Public Works  
City of Los Angeles  
650 So. Spring Street, 7th Floor  
Los Angeles, CA 90014

**LOS ANGELES COUNTY STORM WATER WORKSHOP AT CITY OF LOS ANGELES  
BOARD OF PUBLIC WORKS HEARING ROOM JUNE 18, 1996**

On behalf of the California Regional Water Quality Control Board, the Assistant Executive Officer, and our staff, I would like to officially thank you for your help in the preparations for our storm water workshop held on June 18, 1996. You went above and beyond extending common courtesy to our staff and want you to know that this has not gone unnoticed or unappreciated. The equipment you made available was vital to the success of the workshop. The workshop would not have been possible without your help.

Thank you once again for your assistance.

Sincerely,

ROBERT P. GHIRELLI, D. Env.  
Executive Officer

cc: Honorable Richard Riordan, Mayor, City of Los Angeles  
Board Members, Board of Public Works, City of Los Angeles  
Philip Richardson, Stormwater Management Division, City of Los Angeles

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION71 CENTRE PLAZA DRIVE  
ANTERREY PARK, CA 91754-2154  
(213) 266-7500  
FAX: (213) 266-7400

June 21, 1996

Mr. John J. Agoglia, President  
NBC Enterprises  
3000 West Alameda Avenue  
Burbank, CA 91523LETTER OF SUPPORT FOR THE TENTATIVE LOS ANGELES COUNTY MUNICIPAL  
STORM WATER PERMIT

We received your letter of June 12, 1996, and many letters from your staff and co-workers in which you urge our Board members to adopt the tentative Los Angeles County Municipal Storm Water Discharge Permit on July 15, 1996. Copies of these letters will be provided to the Board for their consideration as part of the official permit adoption file.

As you may be aware, our staff have been actively involved in discussions regarding this permit since early 1995. We have heard and discussed many issues pertaining to the consequences of this permit, both economic and environmental. We feel that the County-Wide Storm Water Management Plan required under this permit, when implemented, will have a significant positive effect on water quality in Los Angeles County.

Thank you for your interest in improving our water quality and taking the time to write us. We invite you to attend our Regional Water Quality Control Board meeting on July 15, 1996, 9 a.m. in downtown Los Angeles at the corner of South Grand Avenue and West Temple Street. Specifically, the address is:

Los Angeles County Board of Supervisors  
Hearing Room  
Kenneth Hahn Hall of Administration  
500 West Temple Street.

If you should have any questions or comments in regards to this letter or the permit in general, please do not hesitate to contact me at (213) 266-7510 or Catherine Tyrrell at (213) 266-7515.

ROBERT P. GHIRELLI, D. Env.  
Executive OfficerV  
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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

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June 21, 1996

Ms. J.P. Ellman, President  
Board of Public Works  
City of Los Angeles  
200 North Spring Street  
Los Angeles, CA 90012

LOS ANGELES COUNTY STORM WATER WORKSHOP AT CITY OF LOS ANGELES  
BOARD OF PUBLIC WORKS HEARING ROOM JUNE 18, 1996

On behalf of the California Regional Water Quality Control Board, I would like to thank the Board members of the Board of Public Works for the use of your hearing room for our storm water workshop held on June 18, 1996. The workshop was a success.

In addition, I would like to make you aware that your staff member, Mr. Michael Kantor, in the Stormwater Management Division, was of great assistance to my staff. He facilitated in making available the needed equipment for use during the workshop. I have sent a letter of appreciation to Mr. Kantor thanking him for his assistance. He went above and beyond extending common courtesy to our staff.

Thank you once again for the hospitality extended to our Board and staff.

Sincerely,

*Robert P. Ghirelli*

ROBERT P. GHIRELLI, D. Env.  
Executive Officer

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-3136  
TEL: (213) 266-7300  
FAX: (213) 266-7600



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June 17, 1996

Interested Party:

**TENTATIVE MUNICIPAL STORM WATER PERMIT FOR THE COUNTY OF LOS ANGELES (CAS614001)**

Our letter dated May 23, 1996, transmitted the subject tentative permit for your comments. We recognize that there are additional issues that may have to be resolved. Two of these issues are Receiving Water Limitations and Administrative Review requirements. Since May 23, we have conferred with our legal counsels and as a result we are proposing changes to these sections and associated findings. These changes are attached.

Again, we encourage early submittal of your comments so that we can continue the dialogue to resolve issues of concern.

Should you have any questions, please call me at (213) 266-7515, or any of the following Board staff members: Winnie Jesena, (213) 266-7594; Xavier Swamikannu, (213) 266-7592; or Carlos Urrunaga, (213) 266-7598.

**CATHERINE TYRRELL**  
Assistant Executive Officer

Enclosure: Revisions to the 5/23/96 Tentative Permit

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State of California  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

REVISIONS TO THE 5/23/96 LA COUNTY STORM WATER TENTATIVE PERMIT

RECEIVING WATER LIMITATIONS

1. Change FINDINGS 28 and 29 (page 7) to read:

28. The objective of this Order is to protect the beneficial uses of receiving waters in Los Angeles County. To meet this objective, this Order requires implementation of BMPs intended to reduce pollutants in storm water and urban runoff such that ultimately their discharge will neither cause violations of water quality objectives nor create conditions of nuisance in receiving waters.

29. The Regional Board recognizes the challenges unique to regulating storm water discharges through municipal storm sewer systems, including intermittent and variable nature of discharges, difficulties in monitoring, and limited physical control over the discharge, will require adequate time to implement and evaluate the effectiveness of best management practices required in this Order and to determine whether they will adequately protect the receiving water.

2. Change RECEIVING WATER LIMITATIONS (page 11) to read:

The water quality objectives and water quality standards contained in the Basin Plan (*Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water Quality Control Board, Los Angeles Region, Monterey Park, 1994*), and amendments thereto, shall serve as Receiving Water Limitations for discharges covered under this Order. It is the purpose of this Order that the discharge of storm water, or non-storm water, from a municipal separate storm sewer system (MS4) for which a Permittee is responsible not cause nuisance, continuing or recurring impairment of beneficial uses, or exceedances of water quality objectives in the receiving waters.

Timely and complete implementation by a Permittee of the storm water management programs prescribed in this Order shall satisfy the requirements of this section and constitute compliance with receiving water limitations. However, if the Integrated Receiving Waters Impact Report required in this Order (Section VII.D.) and/or other available information show that discharges authorized under this Order still cause or contribute to the impairment of the beneficial uses or exceedances of water quality objectives, Permittees, as part of their Report of Waste Discharge for the renewal of this Order, shall submit revised storm water management programs that are watershed-specific and will increase the likelihood of preventing future exceedances of water quality objectives.

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- 3. The above changes in Receiving Water Limitations is accompanied by a change in Annual Program Report, Part VII.A.2.b. (page 58) to read:
  - b. A summary of program accomplishments and self assessments of strategy effectiveness (including how the Permittee arrived at new program elements, if any) by each Permittee, organized by Watershed Management Areas, in the areas of (i) Program Management; (ii) Illicit Connections/Discharges; (iii) Development Planning/Construction; (iv) Public Agency; (v) Public Education/Public Participation.

- 4. Change Part VII.D. Receiving Water Impacts Report (page 59 & 60) to read:

- D. Integrated Receiving Water Impacts Report

The Principal Permittee shall, not later than 54 months after adoption of this Order, prepare and submit an Integrated Receiving Water Impacts Report. The report shall include, but not be limited to, a comprehensive analysis of the results of the different monitoring data (land use, mass emission, critical source, load assessment, receiving waters, and other pertinent studies available), and feasible environmental indicators. It shall also include recommendations on future monitoring requirements, e.g., integration of storm water receiving water monitoring with regional receiving water monitoring, if applicable. This report will be an integral part of the Report of Waste Discharge for the renewal of this Order.

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**ADMINISTRATIVE REVIEW**

- 5. Change Part 2.I.G. Administrative Review pages 21 and 22 to read:

- G. Administrative Review

The administrative review process formalizes the procedure for review and acceptance of reports and documents submitted to the Regional Board under this Order. In addition, it provides a method to resolve any differences in compliance expectations between the Regional Board and Permittees prior to initiating enforcement action.

- 1. Storm water program documents, including progress reports, guidelines checklists, BMPs, databases, program summaries, and implementation and compliance schedules, developed by the Principal Permittee or a

Permittee under the provisions of this Order shall be submitted to the Regional Board.

- a. For documents that require Executive Officer's approval, the Executive Officer will notify the Principal Permittee and/or Permittee of the results of the review and approval or disapproval within 120 days. If the Executive Officer has not responded within 120 days following submittal, the Permittee shall notify the Regional Board and interested parties of its intent to implement the program components as submitted. If after 10 days the Executive Officer has not responded, the Permittee will implement the submitted program and the Executive Officer may not make modifications thereof.
  - b. Documents that require formal Regional Board approval will undergo public review and comment before Board consideration at a public meeting.
2. If the Executive Officer determines that a Permittee's storm water program is insufficient to meet the provisions of this Order, the Executive Officer shall send a "Notice of Intent to Meet and Confer (NIMC)" to the Permittee, with specific information in support of the determination. The NIMC shall include a time frame by which the Permittee must meet with Regional Board staff.

**Note:** Subsequent provisions under Administrative Review remain the same as in the 5/23/96 tentative.

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION



101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX (213) 266-7600

June 17, 1996

Mr. Rufus C. Young, Jr.  
Burke, Williams, & Sorensen  
611 West Sixth Street, Suite 2500  
Los Angeles, CA 90017

**REGARDING TENTATIVE WASTE DISCHARGE REQUIREMENTS FOR MUNICIPAL  
STORM WATER AND URBAN RUNOFF DISCHARGES WITHIN THE COUNTY OF  
LOS ANGELES**

We have received your letter dated June 5, 1996 requesting, pursuant to the California Public Records Act, review of enumerated documents concerning the development of provisions of the Municipal Storm Water Discharge Permit for Los Angeles County. Staff is preparing a written response to your request, and it will be provided as soon as possible after our scheduled workshop of June 18, 1996. However, in the meantime, please contact Carlos Urrunaga of my staff to arrange a visit to review available documents at (213) 266-7598.

If you have any other questions or comments please feel free to call me directly at (213) 266-7510. If the questions or comments fall into the legal realm, please call Jorge León, the Regional Board Senior Attorney at (916) 657-2428.

*Catherine Tynell*

*for* ROBERT P. GHIRELLI, D.Env.  
Executive Officer

cc: Jorge León, Office of the Chief Counsel, State Water Resources Control Board

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION



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May 23, 1996

Ms. J.P. Ellman, President  
Board of Public Works  
City of Los Angeles  
200 North Spring Street  
Los Angeles, CA 90012

RE: USE OF CITY OF LOS ANGELES BOARD OF PUBLIC WORKS HEARING ROOM FOR  
A PUBLIC WORKSHOP ON JUNE 18, 1996

On June 18, 1996, the California Regional Water Quality Control Board, Los Angeles Region, will be holding a public workshop. The main topic on the agenda is to discuss issues concerning a storm water discharge permit for the municipalities of Los Angeles County. The audience is expected to be officials representing the municipalities in Los Angeles County, federal and state agencies, and members of the business community and public in Los Angeles County. Total attendance is expected to be 200 people, which our offices cannot accommodate. It is for the lack of space at our offices that we request the use of the City of Los Angeles Board of Public Works hearing room for Tuesday, June 18, 1996. The room has already been tentatively reserved for us by staff of the Stormwater Management Division. This letter is to confirm the reservation.

The public workshop will begin at 9 am and may continue until 4 pm. Visual equipment consisting of a separate slide and overhead projector will be provided by our office. However, we request the use of the following City equipment:

- A projection screen for the slide and overhead projectors,
- Microphones and amplification for the speakers and audience.

Please advise us of any requirements that will be placed upon the State for the use of the hearing room facilities.

If any further information is needed please call me at (213) 266-7510 or have your staff contact Carlos Urrunaga at (213) 266-7598.

Sincerely,

*Robert P. Ghirelli*

ROBERT P. GHIRELLI, D.Env.  
Executive Officer

cc: Mr. Philip L. Richardson, Stormwater Management Division, City of Los Angeles

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
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May 23, 1996

Dear Interested Party:

I am pleased to send to you the enclosed documents: 1) a detailed response-to-comments on the December 18 version of the "Waste Discharge Requirements for Municipal Storm Water and Urban Runoff in Los Angeles County", and, based on these comments, 2) a revised tentative permit for your review and comment. Also attached is a memo from our attorney responding to several legal issues that were raised in comments.

The Regional Water Quality Control Board (Regional Board) requests your comments on the tentative permit by June 26, 1996. A workshop to answer questions on the permit and to discuss the monitoring program and other issues in more detail will be held on Tuesday, June 18, 1996. (The date of this workshop was changed from late May at the request of a number of cities). More information on the workshop will be provided in a future mailing. We anticipate bringing the final tentative permit to the Regional Board for adoption on July 15, 1996.

Background

The federal Clean Water Act requires cities to obtain NPDES permits for discharges of storm water to the municipal separate storm sewer system (MS4) and requires controls to reduce the discharge of pollutants to the maximum extent practicable. The Los Angeles Regional Water Quality Control Board issued the first "storm water" permit in June of 1990 to the municipalities within Los Angeles County. The permit attached is for the renewal of the 1990 permit.

To initiate the development of a revised permit, an advisory committee of key stakeholders was convened to work with Board staff to develop permit language. Since direct discussions with 86 jurisdictions was not practical, the Regional Board asked the County of Los Angeles (the principal permittee) to assemble a representative group of city delegates. Besides the County, three small city representatives, and the City of Los Angeles were chosen from the membership of the Storm Water Executive Advisory Committee (EAC). The environmental organization, Heal the Bay, was asked to represent the environmental perspective. This involvement was an important step to develop broad stakeholder understanding of permit issues and to reduce the likelihood of third party citizen lawsuits or appeals. And, because they must approve the final permit, a USEPA representative was also invited to participate, but was not able to attend on a regular basis due to travel restrictions. This advisory committee, often called the "negotiating group", was convened approximately a year ago and met two to three times a month through the fall to identify areas of agreement and narrow areas of disagreement.

In addition to committee meetings, Regional Board staff held two "all-cities" meetings, six

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meetings with watershed committees, two meetings with stakeholder attorneys, and numerous meetings with individual city representatives, involving many more players than is typically the case with an NPDES permit renewal. Working with the advisory committee's input, staff floated a first partial draft permit in September 1995. A first full draft was distributed for comments in December, 1995.

Besides the cities and the County, other key players have been actively involved in the permit review process: California Restaurant Association, Western States Petroleum Association, the Building Industry Association, and a law firm which represents about a quarter of the municipalities in Los Angeles County. These groups worked very productively with the Regional Board staff and other stakeholders to develop language for issues raised on the December draft.

**Issues**

The key issues raised during the public review of the December draft are summarized below along with a discussion of their resolution in the enclosed tentative permit.

1) **Industrial facility inspections** - The December 1995 draft called for the cities to conduct storm water inspections of industrial and commercial sites in their jurisdictions. Many cities objected strenuously, citing the high cost of hiring additional inspectors and possible partial duplication with state responsibilities. The revised permit deals with these concerns by removing the enforcement aspect of the "site visit" and, rather, emphasizing education and compliance assistance. Revisions also clarify that the intent is to "piggy-back" these site visits conducted by city personnel (e.g., fire departments already visit every business inspecting for compliance with hazardous waste requirements, and health departments visit all restaurants yearly, etc.). Additionally, the revisions clarify that the cities only determine whether a state permit has been filed but play no role in enforcing the state permit.

2) **Construction site inspections** - The December 1995 draft on construction issues defined various levels of priority projects with criteria that were not acceptable to all cities and builders. Issues related to cities not wanting to duplicate state responsibility under the statewide construction permit program were raised by cities, while builders wanted to minimize duplicate inspections by municipalities and the state. Because the cities already have in place grading and erosion control ordinances representing about 90% of the construction site storm water program, our goal was to implement both programs through the cities inspection programs. This is the approach taken in the enclosed draft. Accompanying this language change is a recommendation to the State Board that fees for the statewide storm water construction program be set at the same level statewide and that half of the fee be forwarded to municipalities for the field portion of the program.

3) **Receiving water limits** - Every NPDES permit contains receiving water limits, either narrative, numerical, and in most cases both. None of the municipal storm water permits in the state contain numerical limits; they do contain narrative limits. Cities are concerned that with these limits in the permit, they could be found in violation of the permit immediately upon

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adoption. For example, a styrofoam cup floating down the L.A. River after a storm, could be construed as violating the narrative limit which states: "No floatable materials shall be observed". The revised permit contains language that measures compliance in terms of reasonable further progress implementing the permit requirements. In other words, if a city is implementing the permit in a timely fashion, it would be considered in compliance with the permit, even if floatable materials appeared in the L.A. River after a storm.

4) **Business and public participation on permittee advisory committee** - The December draft calls for an Executive Advisory Committee (EAC), made up of a cross section of permittees, to work with the lead permittee (Los Angeles County) in devising BMPs, model programs, etc. It designates a Regional Board, industry, and environmental representative as non-voting members of the committee. Many cities indicated that they do not want the permit to designate an executive advisory committee. Or if such a committee is designated in the permit, many cities voiced opposition to designating non-city members. The solution proposed in the latest draft is to address the existence of the EAC in the Permit Findings, reinforcing its usefulness as a coordinating mechanism, but, in the text of the permit, indicate that the principal permittee must consult with permittees rather than specifying that they must consult with the EAC. Public and business sector involvement in developing programs before they are finalized and submitted to the Regional Board is strongly encouraged. The County, as principal permittee, must distribute programs developed by the county to a full mailing list of interested parties at the same time they are sent to the Regional Board. The Regional Board will not approve the programs until a forty-five day review period is completed. This approach provides greater flexibility for the principal permittee to consult either with the EAC or with any other combination of permittees brought together on specific aspects of the permit. It also provides for public review and input.

5) **Schedule for implementation** - The December draft contained the first comprehensive schedule of implementation dates. Cities raised issues regarding the feasibility of implementing programs on the schedule presented. For instance, the December draft called for permittees to provide information on resources allocated to storm water management within 30 days of budget adoption. Based on comments from the County and others, that schedule has been modified so that cities have 60 days from budget adoption to provide appropriate information to the principal permittee. Timelines have been revised in the draft tentative.

**Alternative Permit**

On April 25, 1996, the Regional Board received an "alternative countywide storm water management program" proposal from the EAC. Although developed through different channels, a review of the program matrix attached to the proposal demonstrates a strong correlation to the enclosed tentative permit. The introduction makes reference to adopting a shorter permit as in other parts of California. It is important to note that other areas with very brief permits have already developed voluminous countywide and/or watershed specific management plans in their applications. In those cases, the permits simply direct their implementation. Since development of these specific programs did not previously occur in Los Angeles County, the permit contains a greater amount of detail. None-the-less, the substance is essentially the same.

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Costs

With the changes to the permit described above, along with reduced costs to permittees other than the principal permittee for monitoring and reporting, and with the possibility of a share in fees for construction inspections, the costs to cities have been reduced significantly. A more detailed analysis of costs is planned for completion by the June workshop. To accomplish that task, we are gathering data from municipalities relative to the cost of implementation. Discussions between Santa Monica Bay Restoration Project (SMBRP) staff and municipalities in that watershed have demonstrated that few cities have a breakdown of costs by permit task, except for the city of Los Angeles. However, the San Gabriel Valley Council of Governments has completed a permit cost survey which could form the basis of comparison - particularly for small cities. We have requested a copy of the permit cost survey but have not yet received it. Receiving it soon will be critical to accomplishing a useful analysis. We are also asking USEPA to provide us with an assessment of any significant differences bearing on costs in the revised permit requirements compared to those of Orange County and Santa Clara County.

In closing, I want to encourage your early communication with Board staff to clarify any issues you may have. To guide understanding of the permit, the SMBRP Watershed Council established a group of elected officials and communications experts to develop additional user-friendly materials on the permit. The SMBRP will soon be sending to each city council, under separate cover, a video introduction to the permit and a brief permit summary.

I trust you will find the draft tentative permit responsive to your comments, and look forward to your help in finalizing the permit which will serve as the blueprint for storm water and urban runoff protection in Los Angeles County. Should you have any questions, please call me at (213) 266-7515. The senior engineer on this permit is Winnie Jesena. She may be reached at (213) 266-7594. The staff person most knowledgeable about the details of the permit is Carlos Urrunaga and he may be reached at (213) 266-7598. Written comments on the permit should be directed to his attention.

Sincerely,

*Catherine Tyrrell*

CATHERINE TYRRELL  
Assistant Executive Officer

Enclosures:

- 1) Response to Comments
- 2) Revised Draft Tentative Permit
- 3) Legal Memo

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State of California  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

RESPONSES TO COMMENTS RECEIVED\*  
ON THE  
DECEMBER 18, 1995 DRAFT  
NPDES PERMIT  
FOR  
MUNICIPAL STORM WATER AND URBAN RUNOFF DISCHARGES  
WITHIN THE COUNTY OF LOS ANGELES

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See also responses to legal comments by the Regional Board Counsel (in the memorandum dated April 17, 1996).

\* By February 6, 1996

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I. FINDINGS

Commenter	Comment	Discussion	Action
<p>Agoura Hills, Long Beach, EAC, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Culver City, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier, Bellflower, El Segundo</p> <p>Western States Petroleum Assoc.</p>	<p>The findings do not represent statements of fact or there is no evidence to show why the findings are made. Findings should not repeat what is in the Order. Should not be self serving or biased. Should be limited to those relevant to storm water quality enhancement. Statements about enforcement actions taken as a result of the current permit should not be included.</p> <p>Include a list of references in the Findings.</p>	<p>State Administrative Procedures manual provides guidance on information to be included in findings such as addressing water quality control plans and water quality objectives; identifying existing requirements and any enforcement actions and amendments thereto.</p>	<p>Findings have been revised to include statements of fact and show headings and categories to facilitate identification of information within the Findings section.</p> <p>References have been included in the Findings section.</p>

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II. RECEIVING WATER LIMITATIONS

COMMENTING AGENCIES	COMMENTS	DISCUSSION	ACTION
<p>Receiving Water Limitations</p> <p>EAC, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivers, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier</p> <p>Los Angeles County</p> <p>Los Angeles</p> <p>Long Beach.</p>	<p>Compliance with receiving water limits is unachievable. Compliance should be measured based on implementation of programs.</p> <p>The Receiving Water Limits language creates significant liability. The city suggests that the standard be reasonable further progress towards reducing pollutants during the permit term and not attainment of water quality standards.</p> <p>The draft permit contains two sets of standards which appear to be in conflict. One based on objectives and standards in plans and the other based on implementation requirements in the draft permit.</p> <p>The existing RWL language will expose each city to a violation of the narrative limits and the permit conditions immediately</p>	<p>The fundamental objective of the Clean Water Act is to protect, maintain or restore existing or potential beneficial uses of receiving waters as evaluated in 1972. Narrative criteria were developed to achieve this goal and are considered necessary by the USEPA to meet the statutory requirements of Clean Water Act (CWA) Section 303(c)(2)(A). These are to be applied to all NPDES permits including those for storm water discharges.</p>	<p>The Receiving Water Limitations language has been revised such that Permittees are not in violation of the permit if they are actively engaged in implementing permit requirements in a satisfactory manner.</p>

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<p>EAC, Agoura Hills, Alhambra, Azusa, Baldwin Park, Covina, Claremont, Commerce, Culver City, Downey, El Segundo, Glendale, Glendora, Hermosa Beach, LaVerne, Los Angeles, Lakewood, Lomita, Long Beach, Industry, San Marino, Sierra Madre, San Marino, Signal Hill, So. El Monte, So. Gate, Torrance, Valencia, West Covina, Whittier</p> <p>Heal the Bay</p> <p>Valencia Company</p>	<p>Permittees are not given the opportunity to implement their MS4 program and progress to meet clean water objectives. Instead, they would have to study almost immediately the cause of violations.</p> <p>The present language implies that municipalities are in non-compliance even when they are implementing the program in a timely manner, but are unable to eliminate violation of narrative standards. The permit should state that compliance is determined not from specific water quality objectives, but from functional equivalency measured by timely and effective implementation of the permit provisions.</p> <p>Water quality standards in statewide plans may be met by the implementation of BMPs. Delete language from the Order.</p>	<p>It is generally accepted that implementation of the requirements of the storm water permit constitutes functional equivalence to compliance with water quality standards. Both the USEPA and the State Water Resources Control Board have stated that BMPs are adequate effluent limitations for MS4 storm water discharges to achieve compliance with water quality standards.</p>	<p>See action above.</p>
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III. PROGRAM REQUIREMENTS FOR PROGRAM MANAGEMENT

COMMENTING AGENCIES	COMMENTS	DISCUSSION	ACTIONS
Principal Permitee			
Hermosa Beach	To place all Principal Permitee requirements in a single section will help to reduce confusion by individual permittees.	The Order contains tables at the beginning of each major section which provides a summary of requirements and shows who needs to implement what and when.	No action suggested
BIA	What moneys will the Principal Permitee use to fund and provide personnel for the development and updating of the CSWMP and the six WMAPs? What is the projected cost of these activities?	The County of Los Angeles has agreed to these activities.  The projected cost has not been made available by the County of Los Angeles.	No action suggested
Calebasas	Water quality monitoring implementation should be a county responsibility.	The commenter appears to believe that the burden for monitoring has shifted to individual Permittees.  The County's responsibilities include the majority of monitoring requirements.	The permit has been revised to state that the Principal Permitee shall conduct countywide storm water monitoring as one of its responsibilities.
Heal the Bay	The phrase "With the guidance of EAC" throughout the Permit implies that the EAC has control over the implementation of the permit. If the EAC has no legal responsibility, then the role is advisory only.	Please see the Regional Board Counsel's legal memorandum dated April 17, 1996, comment no. 1.	The structure of the EAC and WMCs is presented in the Findings. Reference to the responsibilities of the EAC has been removed.
La Verne	Appointment of a chair to the Watershed Management Committee (WMC) is unnecessary. The county convenes and conducts the meetings. The WMC may select a chair if it determines it to be necessary.	The intent is to have an effective WMC. Also please see the Regional Board Counsel's legal memorandum dated April 17, 1996, comment no. 1.	The permit revision states that the WMC will choose a chair and secretary, and that Los Angeles County will assume these roles until the WMC chooses.

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COMMENTERS	COMMENTS	DISCUSSION	ACTIONS
Permittees			
El Segundo, La Verne, Long Beach, LACDPW, Agoura Hills	<p>Few agencies can or will appoint a staff member with the delegated authority required under this permit to sit on the WMC. Many of the issues to be raised are budgetary or policy-related which will require city council or board action. This provision reflects a limited understanding of local government processes and should be stricken from the permit.</p> <p>Incorrectly requires the delegation of authority from a City official to staff.</p>	<p>The Permit requires that a representative be appointed to the WMC with authority to make decisions for the Permittee agency. The intent is to have a workable WMC. The Permittee representative who attends the WMC and/or the EAC meetings should provide input to the development of any program requirements and update their governing Boards as the CSWMP and WMAPs are being developed and implemented.</p>	<p>The statement has been changed to a 'technically knowledgeable representative'.</p>
Long Beach	<p>This section on internal Permittee coordination should be deleted. How the Permittee coordinates and implements this program within its agency should not be specified in this permit.</p>	<p>Some Permittees state that it is easier to gain cooperation from other City departments if it is clear in the Permit that departments within the Permittee's purview must work cooperatively.</p>	<p>No change suggested.</p>
Bell Gardens, Torrance	<p>It is suggested that program requirements be limited to practices which are assured of some degree of success</p>	<p>Program components were included based on MS4 requirements statewide and elsewhere in the nation. Evidence exists that they are effective.</p>	<p>No change suggested.</p>
El Segundo, City of LA	<p>By what authority may a Permittee be required to "jointly prepare" a WMAP? Jointly with whom?</p> <p>Is a Permittee liable for errors of other joint preparers?</p>	<p>Permittees in a Watershed Management Area have the joint responsibility with other Watershed Permittees to prepare the WMAP as part of the renewal application (2001).</p> <p>An individual Permittee is only responsible for its own actions or inactions, and not that of those of any other Permittee(s).</p>	<p>No change suggested.</p>

Heel the Bay	Section does not specifically state that the Permittee is responsible for the implementation of the requirements of the Order as soon as the Order is adopted	Permittees may falsely believe that they have nothing to do until the CSVAMP is complete. Permittees are required to implement existing storm water BMPs.	Language has been included to state that Permittees are required to implement components by specified dates.
External Agency Coordination			
Bellflower, El Segundo	Electronic bulletin boards are outdated technology. The Board should make the information available on the internet.	Not all Permittees have a comparable level of access to electronic information. The Regional Water Quality Control Board is currently updating the information services available within the office. The additions include internet capabilities.	Permit language has been changed to state that information will be available from the Regional Board via the electronic bulletin board or other available methods.
LACDPW, Santa Clarita	The US Army Corp of Engineers and State Parks, and US Forest Service should be added to list of cooperating agencies for external coordination.	The list provided in the Permit was not intended to be all inclusive.	The suggested entities have been added to the list.

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Executive Advisory Committee			
<p>Agoura Hills, Alhambra, Azusa, Baldwin Park, Beverly Hills, Bradbury, Carson, Cerritos, Claremont, Commerce, Covina, Culver City, EAC, Downey, Glendale, Glendora, Heal the Bay, Hermosa Beach, Industry, Inglewood, Inwindale, La Verne, Lomita, Los Angeles City, LACDPW, Lakewood, Lomita, Long Beach, Norwalk, Palos Verdes Estates, Pico Rivera, San Marino, Santa Clarita, Santa Fe Springs, Sierra Madre, Signal Hill, S El Monte, S Gate, Torrance, Vernon, West Covina, West Hollywood, Westlake Village, Whittier</p> <p>BIA, Heal the Bay, Senator Hayden,</p> <p>Agoura Hills, Alhambra, Carson, Claremont, Commerce, Culver City, EAC, Glendora, Heal the Bay, Hermosa Beach, La Verne, Lomita, Palos Verdes Estates, Torrance, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier</p> <p>La Verne</p> <p>Santa Monica</p>	<p>The membership of the EAC should be left to the permittees and not dictated by Regional Board staff.</p> <p>There should be no non voting members on the EAC. The EAC should be limited to public agency personnel.</p> <p>The concern for public input at the EAC level is unwarranted (or unnecessary). The public will be allowed to input during the public comment periods.</p> <p>The Regional Board representative, member of the public, and two industry representatives are presently designated as non-voting members of the EAC. These members should be able to vote. The public member should be an environmental community representative.</p> <p>The makeup of the EAC in the December Permit deviates significantly from the current selection process. Permittees suggest that the selection process be returned to the WMC for election of the most qualified persons for the positions as members of the EAC.</p> <p>The Regional Board should have no authority to appoint persons to the WMCs. This section should note that selection and participation on the EAC by permittees other than the county and City of Los Angeles is voluntary.</p> <p>The WMC representative to the EAC should be based on WMC consensus, defaulting to the city with the largest population if necessary.</p>	<p>It is suggested that Permittees include members of the public including business and environmental representatives during the development and implementation of the CSWMP and WMAPs.</p> <p>(40 CFR 122.26(D)(2)(iv) requires that a storm water management program "include a comprehensive planning process which involves public participation...")</p> <p>Please see the Regional Board Counsel's legal memorandum dated April 17, 1996, comment no. 1.</p> <p>Participation on the EAC is voluntary. References to specific makeup of EAC and WMCs and processes has been eliminated.</p>	<p>Reference to the make-up, participation and responsibilities of the EAC has been deleted from the Section.</p> <p>The Findings briefly describes the structure of the EAC as originally proposed in the application.</p>

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Calabasas and Malibu Creek Permittees	Two representatives from each watershed area should serve on the EAC. One of whom must be an elected official from a Permittee city.	An elected official on the EAC would be beneficial to policy making. However, the support is not shared by all.	No change suggested.
La Verne Bellflower, La Verne, Beverly Hills, Bradbury, Carson, Diamond Bar, Hermosa Beach, Norwalk, Rolling Hills, West Hollywood, Westlake Village	How may the EAC guide conflict resolution among Permittees and advise the County on its liaison responsibilities to the Regional Board.  The EAC cannot coordinate the implementation of pilot projects because it is beyond the means of the EAC. Suggest striking it from the Permit.  The EAC doesn't have the ability or legal authority to compile information for submittal to the Regional Board. Suggest striking it from the Permit.	Regional Board Counsel's legal memorandum, dated April 17, 1988, addresses the issue. See Response No. 1.	The Regional Board's Counsel prepared and sent a response.
Watershed Management Committees			
La Verne	Appointment of a chair to the Watershed Management Committees (WMC) is unnecessary. The county convenes and conducts the meetings. The WMC may select a chair if it determines it to be necessary.  What issues will the WMC be voting upon?	The intent is to have an effective WMC.  The issues to be voted upon by the Permittees on the WMCs may include EAC representation, modifications to CSVAMP, WMAP components, and recommendations to the EAC, among other issues.	The permit revision states that the WMC will choose a chair and secretary, and that Los Angeles County may assume these roles if none volunteer.
La Verne	Who pays to circulate the draft annual report? If the WMC, how will it be apportioned and administered?	The County of Los Angeles will circulate the draft annual report among the WMCs and EAC.	No change suggested.
Beverly Hills, Bradbury, Carson, Diamond Bar, Hermosa Beach, Norwalk, Rolling Hills, West Hollywood, Westlake Village	WMC should have no legal requirements. WMC should not be held responsible for any Permit requirements.	Please see the Regional Board Counsel's legal memorandum dated April 17, 1988, comment no. 1.	No change suggested.

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La Verne	Why and what resources is the county expected to provide permittees with populations under 100,000?	Smaller cities had previously noted that they wanted to be on the EAC but had limited resources to do a competent job. The resources to be provided were dependent on specific needs, and would be determined by the County of Los Angeles. The resources anticipated were limited to coordination of meetings, not financial disbursements.	No change suggested.
Heal the Bay, Santa Monica	<p>Permit should clearly require preparation of WMAP according to clear and specific criteria that include monitoring and evaluation as factors that feed back into plan revisions.</p> <p>WMAPs should be developed with consideration of how to enhance degraded beneficial uses and/or protect existing beneficial uses within a watershed as designated in Basin Plan and 303(d) listing.</p> <p>Permit needs to specify who has legal requirement to develop the WMAPs.</p> <p>Add submission deadlines for the WMAPs.</p>	<p>The basic criteria to be followed for the WMAP, are those developed for the CSWAMP, with the appropriate modifications for the watershed.</p> <p>Specificity is sometimes seen as limiting flexibility. Submission deadlines will be added in the revision to the draft.</p>	The permit revision states that the WMAP is to be developed as part of the renewal application in 2001. This will be after the completion of the CSWAMP.

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Torrance	<p>Is there enough evidence regarding the effectiveness of pollution control efforts that the Permittee will be able to make an informed decision?</p> <p>Will the Regional Board be providing the information to the Permittees?</p>	<p>There is sufficient information available nationally to research potential BMPs and make good decisions. Clean Water Act Section 402(p) states that Permittees are required to reduce pollutants in storm water to the maximum extent practicable.</p> <p>Regional Board staff will continue to share valuable BMP and storm water management program information with the Permittees.</p>	No change required.
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COMMENTING AGENCIES	COMMENTS	DISCUSSION	ACTIONS
Fiscal Resources			
<p>Alhambra, Azusa, Bellflower, EAC, Carson, Commerce, Culver City, Downey, El Segundo, Glendale, Glendora, Hermosa Beach, Industry, Inglewood, Lakewood, La Verne, Lomita, Long Beach, Monterey Park, San Marino, Whittier, West Covina, Hermosa Beach, Southgate, Signal Hill, South El Monte, Sierra Madre</p> <p>Claremont</p> <p>La Verne</p> <p>Heal The Bay</p>	<p>The budget requirements are excessive and too detailed. A simple reporting requirement should be used.</p> <p>Permit demonstrates lack of understanding of budgeting process.</p> <p>What is the purpose of providing financial information? The permittees are already overburden with unfunded mandates and ever shrinking financial resources.</p> <p>Budget summary is overly detailed and may prove very difficult to provide.</p>	<p>The budget summary should be sufficient to provide information on storm water program implementation, as required under 40 CFR 122.28(d)(2)(v).</p>	<p>Permit language has been revised to require a budget summary that follows the Principal Permittees' budget summary format.</p>

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<b>Program Substitution</b>			
<p>City of LA Bellflower, El Segundo, La Verne</p> <p>Heal the Bay, Santa Monica Bay Keeper</p>	<p>The Program Substitution requirements are too burdensome.</p> <p>Demonstrating "technical feasibility" or "implementation outweighs the pollution control benefits" is a subjective decision and open to interpretation.</p> <p>Determinations regarding program substitution could be purely subjective, or worse yet, become political. Support section that allows BMP substitution flexibility, not BMP elimination.</p>	<p>The CSWMP and the WMAAPs development process, and this Order will identify BMPs for implementation. Flexibility is provided to Permittees to replace a specific BMPs if they propose better or equally effective alternatives.</p> <p>The Executive Officer is vested with the authority to approve the alternative if the enumerated conditions can be met.</p>	<p>Subtitle heading has been changed to BMP or Requirement Substitution.</p> <p>The Order includes language regarding the replacement of a BMP or requirement within the Substitution section.</p>
<b>Administrative Review</b>			
<p>BIA, Baldwin Park, Bellflower, Bell Gardens, Burke Williams, Claremont, Culver City, EAC, El Segundo, Glendale, Glendora, Heal the Bay, Hermosa Beach, La Verne, Pico Rivera, Rosemead, San Dimas, San Marino, Santa Fe Springs, Torrance, West Covina</p>	<p>Any determination made by the Executive Officer should be subject to appeal to the Regional Board.</p>	<p>The Administrative Review Provision is an informal process to facilitate dispute resolution between the Regional Board and Permittees. This is not required under federal or state law but is included as a courtesy to Permittees. For additional discussion, please refer to the April 17, 1996, Regional Board Counsel's legal memo, Response nos. 2, 3, and 4.</p>	<p>No action suggested.</p>
<p>Bellflower</p>	<p>The review period for all submittals to the Regional Board should be a maximum of 60 days. The 120 day review period could lead the Permittee to expend a substantial effort on a program that may turn out not to be acceptable.</p>	<p>The time period allowed for review by the Regional Board, while not required by current law, to review and respond to Permittees' submittals.</p>	<p>No changes suggested.</p>
<b>Public Review</b>			

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<p>American Oceans Campaign</p> <p>Bay Keeper</p> <p>BIA</p>	<p>WAC meetings should be open to the public and the public should have adequate opportunity to review permit submittals.</p> <p>All programs including measures of effectiveness must be subject to Public Review.</p> <p>Comments submitted by the public within the 45 days comment period must be provided to the Board prior to Board action.</p>	<p>WAC meetings are presently open to the public.</p> <p>All program implementation components submitted to the Regional Board are subject to public review and comment.</p> <p>All comments submitted by the public are made part of the administrative record for consideration by the Regional Board</p>	<p>No changes suggested.</p>
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IV. ILLICIT CONNECTIONS / DISCHARGES

COMMENTING AGENCIES	COMMENTS	DISCUSSION	ACTION
Illicit Connections			
Azusa, W. Covina	Illicit connections remain a costly requirement. Uncertain merit.	This component was required under Order 90-079. "Illicit connections can result ... in dangers to public health; ... can create severe wide-spread contamination problems" (Final rule - 55 FR 222, 48056)	No change suggested.
Agoura Hills	Cities have no control over federal and state land parcels. Who has regulatory control?	Finding 20 in December draft recognizes cities' non jurisdiction in such cases. The Regional Board in such circumstances may issue separate NPDES permits with sufficient evidence.	The Discharge Prohibition Section has been revised to exclude, "Discharges originating from federal, state or other facilities which the Permittee is preempted from regulating".
Alhambra, Culver City, Lemita, Torrance	Differentiate illicit connections, illicit discharges, and illegal disposal.	Illicit connection is the structural plumbing to the MS4. Illicit discharges are unauthorized releases to the MS4. Illegal disposal is a term used by the USEPA to connote improper disposal of oil, toxic materials, etc. The term is not used in the draft but the practice is included under illicit discharges to avoid confusion.	Terms are defined in glossary

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<p>LA County</p> <p>Paramount</p> <p>NRDC</p> <p>Santa Clarita, Vernon</p> <p>NRDC</p>	<p>Allow 8 months from permit adoption for model development for illicit connections and discharges. Each city to submit implementation schedule 4 months from the Executive Officer's approval.</p> <p>Begin implementation of program by June 15, 1997.</p> <p>Develop model by July 15, 1996. Begin implementation by Jan 15, 1997.</p> <p>Adjust begin implementation date to factor budget process, permit delays.</p> <p>City modifications to model must be justified and approved by the Executive Officer.</p>	<p>This component was required under Order 90-079. It might be feasible to develop and implement sooner.</p>	<p>Requirements have been revised to allow 8 months from permit adoption for model development. Cities are given 4 months from model approval by the Regional Board's Executive Officer to begin implementation.</p>
<p>LA Co</p> <p>La Verne</p> <p>Bellflower, El Segundo, La Verne</p>	<p>Inspection schedule is city specific and should not be part of the model.</p> <p>Inspection of illicit connection should be left to the city.</p> <p>Prioritization of problem areas should be left to the city.</p>	<p>Schedule will be made part of a city's program and not the model. The draft stated, 'Methods to prioritize' to be developed as part of the countywide model. Each city still determines its own priorities.</p>	<p>The reference to an implementation schedule with the countywide model has been deleted in the revision.</p>
<p>Vernon</p>	<p>Who will follow up on illicit connections?</p>	<p>The owners/operators of the MS4 system. Intragency agreements are encouraged in 'Program Management: Legal Authority' to facilitate the process.</p>	<p>No action suggested</p>
<p>W. Covina</p>	<p>GIS is a costly expense.</p>	<p>The draft did not require a GIS. However, it is a useful tool to map and track the drainage system.</p>	<p>No action suggested</p>
<p>Santa Clarita</p>	<p>Illicit connections includes physical transfer to other natural and constructed drainage systems.</p>	<p>An illicit connection is an unauthorized structural plumbing to the MS4 which may include constructed drainage systems and natural drainage systems.</p>	<p>No action suggested</p>

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Long Beach	Clearly state the minimum requirements for the program to eliminate illicit connections and discharges.	The minimum requirements are described in the Order under Illicit Connections. Additional guidance is found in the USEPA guidance document, <i>Investigation of Inappropriate Pollutant Entries into Storm Drainage Systems, USEPA Document No/600/R-92/238</i>	No action suggested
Illicit Discharges			
El Segundo	Standard enforcement procedures unnecessary since city specific.	Standard enforcement procedures in the model promote countywide consistency. However, the extent of use will still be city specific.	No action suggested
LA County  NRDC	Allow 8 months from permit adoption for model development. Each city to submit implementation schedule 4 months from the Executive Officer's approval.  Develop model by July 15, 1996. Begin implementation by Jan 15, 1997.  City modifications to model must be justified and approved by the Executive Officer.	This component was required under Order 90-079. It might be feasible to develop and implement sooner. See NRDC's comment below.	Requirements have been revised to allow 8 months from permit adoption for model development. Cities are given 4 months from model approval by the Executive Officer to begin implementation.
LA County	Separate surveillance program not cost effective. Delete. Field staff education program sufficient.	USEPA regulations require, "procedures to conduct on-going field screening to investigate portions ... with a reasonable potential of containing illicit discharges" (Final Rule 55 FR 222, 48071). Education of employees may be insufficient.	No action suggested
Other Prohibited Activities			

Inglewood  Los Angeles  NRDC	Date to prohibit by legal authority is too soon.  Date to prohibit should be 120 days from effective date of Permit.  Propose 3 months from permit adoption to obtain authority to prohibit.	July 1988 may be too soon.	This Section has been merged with the Legal Authority subsection. The Permittee is given 120 days from adoption of the permit to demonstrate legal authority to prohibit.
Western States Petroleum Association (WSPA)	Mere presence of leaves in storm water discharge must not be deemed a violation	The legal prohibition is on disposal of leaves as the language suggests and not mere presence. Disposal is an affirmative action.	No action suggested.
Southern Cal Rock Products	Indicate that concrete trucks may be washed out on construction sites but must avoid discharge to storm drains.	Language can be clarified.	The permit language has been revised.
Torrance	Why are concrete trucks singled out when there are other significant sources?	USEPA regulations include a "requirement to effectively prohibit non-storm water discharges to the MS4" (Final Rule 55 FR 222, 48055). Other significant sources of pollutants must also be addressed when identified.	No action suggested
Industry	Exclude wash-down of impervious surfaces. Necessary for proper adhesion during asphalt pavement resurfacing.	Wash down from asphalt paving may contain PAHs. Non-storm water discharges to the MS4 from such activities must be 'effectively prohibited'.	No action suggested
Long Beach	This subsection may be duplicative with 'Legal Authority'. Specific prohibitions are not supported by evidence.	The specific prohibitions are activities that contribute pollutants to storm water. The specificity of the listed activities may serve as a direct educational tool for the public to draw attention to those practices that contaminate storm water.	This subsection has been deleted, and the requirements integrated with the 'Legal Authority' subsection.

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Non Storm Water Discharges			
<p>Alhambra, Culver City, Commerce, Hermosa Beach, Lakewood, Lomita, Beverly Hills, Bradbury, Carson, Diamond Bar, Hermosa Beach, Norwalk, Rolling Hills, West Hollywood, Westlake Village</p> <p>Long Beach</p> <p>NRDC</p>	<p>Non storm water exemptions should correspond with federal list.</p> <p>Exemptions should be consistent with other Regional Boards.</p> <p>Quality exemption for residential swimming pool discharges to exclude filter back wash.</p>	<p>USEPA regulations require municipalities to address 19 categories of non-storm water only where such discharges are identified by cities as sources of pollutants to receiving waters (Final Rule, 55 FR 222, 48071). The Regional Board currently requires NPDES permit coverage for 4/19 (non-residential swimming pool discharges, groundwater dewatering, hydrostatic testing (water line flushing and potable water sources)). There is no easy way to determine if groundwater discharges are uncontaminated without conducting periodic sampling in an area with a history of regional groundwater contamination such as in LA county.</p> <p>Consistency will be maintained to the extent necessary. However, Regional situations may warrant some deviation.</p>	<p>The non-storm water exemptions has been revised to include 17 out of 19 types listed in federal regulations, with the exception of groundwater infiltration (which must be covered by a state general permit) and street wash water. Sidewalk washing was considered but for consistency purposes, only those specifically named in the USEPA regulations were included.</p>
<p>Claremont, EAC, El Segundo, Glendora, LA County, La Verne, Santa Fe Springs, WSPA, West Covina</p>	<p>Exempt commercial roof drains.</p>	<p>Roof drain discharges by their nature are storm water and need no special exemption as they are covered by this permit. Roof drain discharges that are non-storm water on the other hand must be 'effectively prohibited' since they are not conditionally exempted under federal law.</p>	<p>We have deleted references to roof drainage in this subsection.</p>
<p>MWD, Long Beach</p>	<p>Exempt potable water sources</p>	<p>The Regional Board requires NPDES general permit coverage for discharges from hydrostatic test waters (includes potable water sources). Potable water sources are proposed to be covered under a public utilities general NPDES permit to be issued by the State Board.</p>	<p>Potable water sources have been included under the 'Conditionally Exempt' category.</p>

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Santa Monica	Recommend dechlorination before water line flushing.	Requirements are stated in the Regional Board's NPDES general permit for hydrostatic testing (includes water-line flushing). The State Board's proposed general NPDES permit for public utilities will do the same.	Water line flushing has been included under the 'Conditionally Exempt' category.
<p>Industry, MWD, Santa Fe Springs</p> <p>Vernon</p> <p>Bellflower, El Segundo, La Verne</p> <p>Calebeas</p> <p>Heal the Bay</p> <p>Los Angeles</p> <p>NRDC</p>	<p>Exempt fire hydrant testing; building wash downs; flow testing of new asphalt paving, curbs and gutters.</p> <p>Exempt fire sprinklers testing.</p> <p>Exempt saw cutting, grinding, emergency flares.</p> <p>Exempt hydraulic cleaning, sand blasting.</p> <p>What are inductive traffic loops?</p> <p>Allow cities to select the most appropriate methods of controlling the discharges through planning</p> <p>Future non storm water category exceptions must be subject to public review. Language is proposed</p>	Federal regulations do not list these non-storm water discharges as types that municipalities are 'exempt' from addressing.	Revised language provides Permittees one year to develop and submit a list of non-storm water discharges not in the federal list and with recommended effective prohibition methods to minimize pollutant discharge and adverse impacts on receiving waters.
Alhambra, Bellflower, El Segundo, La Verne	Indicate other non storm water discharges permitted by the State are exempt.	'Discharge Prohibitions' section makes this statement.	A subsection introduction has been included to state, 'non-storm water discharges in compliance with a separate NPDES or WDR permit or granted a discharge exemption by the Executive Officer or the Regional Board or the State Board are not prohibited under this Order'.

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<p>Los Angeles, Santa Clarita</p> <p>Long Beach, Torrance, Alhambra</p> <p>La Verne</p>	<p>Conditionally exempt street washing and side walk washing.</p> <p>What is the basis for the Executive Officer's determination for designating street washing and side walk washing?</p> <p>Are the city or residents prohibited from street and side walk washing?</p>	<p>Street washing is listed as a conditional exempted category under federal regulations, side walk washing is not. Both types of discharges under certain circumstances may transport toxic pollutants, as well as pathogenic bacteria and virus. The potential prohibition is on activity that causes a discharge to the MS4, not the activity itself.</p> <p>The city of Los Angeles is expected to conduct a study of pollutants in and methods to "effectively prohibit" street washing and side walk washing discharges</p>	<p>The revision provides one year for Permittees to come up with a strategy to address street wash water and sidewalk washing as a source of pollutants to the MS4.</p>
<p>BIA</p>	<p>Only the Regional Board should be able to determine the condition necessary to exclude coverage of non storm water in the 'Conditionally Exempted Discharges' category. Neither the Executive Officer nor cities may establish the conditions.</p>	<p>Federal regulations state that 18 enumerated non-storm water discharges need not be prohibited unless municipalities identify these as source of pollutants to the MS4</p>	<p>No action suggested.</p>

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Public Reporting			
Long Beach	List minimum requirements.	Can consider enumerating minimum requirements.	Suggested requirements for Public Reporting have been added to the revision.
LA County  Paramount	Develop standard program 8 months from permit adoption  Cities submit a schedule to implement 4 months after the Executive Officer approval.  Develop standard program by July 15, 1997. Cities implement by October 15, 1997.	This component was developed under Order 90-079. It might be feasible to develop and implement sooner.	Requirements have been revised to allow 8 months from permit adoption for model development. Cities are given 4 months from model approval by the Regional Board's Executive Officer to begin implementation.
La Verne	Define Reportable Quantity.	The term is defined in federal regulations and the glossary.	Term is defined in the glossary.

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V. INDUSTRIAL/COMMERCIAL SOURCES

COMMENTING AGENCIES	COMMENTS	DISCUSSION	ACTION
<p>Identification of Sources</p> <p>Hermosa Beach, Sierra Madre, Signal Hill, So El Monte, South Gate, Los Angeles</p> <p>Inverdale, Long Beach, Palms Verdes Estates</p>	<p>Some cities already have a database in a specific format.</p> <p>Information requested is excessive. SIC and location are sufficient.</p>	<p>Cities are encouraged to work with LA Co to ensure that its format is compatible with those of the cities.</p> <p>Federal regulations and guidance require municipalities to identify the locations of industrial facilities which discharge storm water, and provide an inventory of pollutant sources organized by watershed. NPDES program status will be provided by the Regional Board.</p>	<p>The requirements are restricted to very basic information, (1) Facility name; (2) Site address; (3) Watershed; (4) Applicable SIC Code(s); and (5) NPDES storm water permit coverage status, if applicable.</p>
<p>Cerritos, La Verne, Vemon, El Segundo</p>	<p>Unfunded mandate. Eliminate whole section or limit to data collection on industrial commercial sources.</p>	<p>Federal regulations require cities to "...identify priorities and procedures for inspections and ...control measures" for storm water discharges from industrial activity and commercial areas (Final Rule 55 FR 222, 48070 and 48071).</p>	<p>The section has been eliminated and integrated with the Public Information/ Public Participation Section to emphasize focus on educational outreach.</p>
<p>Santa Clarita, Vemon</p>	<p>Implementation dates are too soon.</p>	<p>The implementation have been revised.</p>	<p>The permit had been revised to provide the Principal Permittee with 6 months from permit adoption to develop the database format and Permittees 6 months from permit adoption to collect the database information for their areas. The Principal Permittee is given 18 months from permit adoption to complete the database.</p>
<p>NRDC</p>	<p>Criteria for selection of additional facilities should not include number but rather total impervious area or area exposed.</p>	<p>Number of facilities is a reasonable albeit less direct measure of potential significance.</p>	<p>No action suggested</p>

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LA Co.	Only those facilities requiring site visits should be included in the database.	A limited number of categories of other facilities identified as significant potential contributors by the USEPA under Phase II may be reasonably included. The option remains with the Permittees.	The revision requires, at a minimum, site visit facilities to be included in the database.
BIA	How were potentially regulated facilities notified?	Finding 34 in the December draft states staff held meetings with affected interests and sought written comments on drafts of the permit.  Additionally, the mailing list for this Order includes associations, utilities, school districts and universities, federal and state facilities, and the LA chamber. The Chamber has agreed to distribute the Order to its business membership.	No action suggested
EAC, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lamita, LACDPW, Norwalk, Pico Rivers, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier	How were priorities established to target certain types of facilities?	Facilities listed in the site education visits requirement include those that were selected by the USEPA to be part of the Phase 1 program, those listed under CZARA guidelines as sources of urban storm water pollutants, dominant Phase II potential sources of pollutants in storm water, and those most frequently given citations for violating local ordinances in the City of Los Angeles in a limited survey.	The list of facilities under the site educational visits has been limited to Phase 1 facilities, gas stations, other automotive service, and restaurants. The WMC may identify other significant potential sources at a later date on the basis of watershed conditions and characteristics.
Prioritization of Sources			

<p>Glendale, Hermosa Beach, Signal Hill, Sierra Madre, So El Monte, So Gate</p> <p>LA Co., Inwindsle, Heal the Bay, Palos Verdes Estates</p> <p>EAC, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier</p>	<p>Prioritization is not feasible because of changing demands on personnel. Delete section.</p> <p>Not a solid procedure or serves no purpose because of specificity of facilities to visit. Delete section.</p> <p>Prioritization for site visits are unclear.</p>	<p>Prioritization may not be necessary because of the specificity of site visits.</p>	<p>This sub-section has been deleted in the revision.</p>
<p>Source Control Measures</p>			
<p>EAC, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier</p>	<p>Clarify level of treatment acceptable for discharge of wash-waters.</p>	<p>The level of treatment acceptable would be methods that meet BAT/ BCT standards for the industry, or effluent standards established for the type of pollutants in the discharge, such as oil and grease, heavy metals, MBAS, pH, TSS.</p>	<p>This requirement has been integrated with the Legal Authority sub-section.</p>
<p>Covina, Long Beach</p> <p>Glendale, Industry, Paramount, Sierra Madre, Signal Hill, So El Monte, Hermosa Beach</p>	<p>Prohibitions are too detailed to include in an ordinance, or exceed CWA requirements.</p> <p>Prohibition date too soon. BMPs list deadline is too soon</p>	<p>Can reconsider prohibition date. The BMPs list will be developed by LA Co. in consultation with the Permittees.</p>	<p>This requirement has been integrated with the Legal Authority sub-section. The revision gives the Permittees 120 days from the date of adoption of the Order to demonstrate legal authority to control the activity.</p>
<p>LA County</p>	<p>BMP lists for only facility categories that require site visits.</p>	<p>Can include a statement to clarify that lists are to be developed for only those categories of facilities that require site visits.</p>	<p>The revision states that BMPs will be developed "for use by Permittees for each industrial/commercial SIC group requiring educational site visits".</p>

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<p>Industry, So Cal Rock Products, Southern Cal Contractors</p> <p>La Verne, BIA</p>	<p>Requirement to cover all hazardous materials and not perform vehicle maintenance to eliminate exposure to storm water is unreasonable.</p> <p>Define 'susceptible or exposed to storm water'</p>	<p>There is no specific requirement to cover materials, only that potential exposure to storm water be eliminated. The language requires storage away from areas that may come in contact with storm water, and repair in areas which are not exposed. Language can be revised to allow for repair in exposed areas but where fluids can be contained, so that there is no discharge to the MS4.</p> <p>The phrase means areas or activities that may potentially come in contact with storm water.</p>	<p>This requirement has been integrated with the Legal Authority subsection.</p>
<p>NRDC</p>	<p>Add swimming pool backwash to list of prohibited wash water discharges.</p>	<p>Can consider adding a prohibition on swimming filter backwash.</p>	<p>Language has been added to the Legal Authority subsection to prohibit filter backwash from swimming pool discharges.</p>
<p>WSPA, BIA</p>	<p>Similar public agency activities are not held to the same standard of performance.</p>	<p>The requirements in the permit are intended to hold public agency activities to the same level of performance as private sector for similar activities</p>	<p>Any apparent inconsistencies between similar public agency and private sector activities have been corrected in the revision including public construction activities and public parking lots.</p>
<p>Source Inspection</p>			

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<p>Inwindale, Inglewood, Vernon</p> <p>Inglewood, Agoura Hills, Azusa, Manhattan Beach, La Verne, Long Beach</p> <p>Heal the Bay, La Mirada, LA Co</p> <p>Senator Hayden, NRDC, Tree People</p>	<p>More time is needed to develop, implement program and inspect so many facilities.</p> <p>Inspections are an unreasonable burden and should be performed by other agencies, or funds must be provided.</p> <p>Only educational site visits should be required for Phase 1 facilities and others</p> <p>Do not change the emphasis and frequency of visits in the section.</p>	<p>Facilities inspection programs were to be developed under Order 90-079. The scope of the inspections has been reduced to educational site visits.</p>	<p>The permit revision establishes frequencies for the educational site visits spread over the five year term, with a minimum of two site visits in the life of this Order. The frequencies give the Permittees a reasonable period of time to initiate the program from the date of adoption of the permit.</p>
<p>Sierra Madre, Signal Hill, So El Monte, So Gate</p>	<p>Who enforces at State permitted facilities?</p>	<p>The Regional Board will enforce the provisions of the State permit at such facilities. The USEPA envisions a partnership between municipalities and the state in overseeing compliance with the state storm water permit. Enforcement of local agency requirements at such sites is with the Permittee.</p>	<p>The Regional Board sent a letter to the State Board to pursue the possibility of sharing permit fees with local agencies to streamline facility site visits, and support local agency lead.</p>
<p>EAC, Baldwin Park, Bell Gardens, Claremont, Commerce, Covina, Downey, Glendale, Glendora, La Verne, Lakewood, Lomita, Long Beach, San Marino, Santa Fe Springs, West Covina, Whittier, El Segundo</p>	<p>Phase 1 facilities and others permitted by the State should be excluded from inspections.</p>	<p>Federal regulations state that municipalities must assist USEPA and NPDES states and implement a program to " I identify priority industries; II review and evaluate SWPPPs and other procedures that industrial facilities develop ...; III establish and implement BMPs to reduce pollutants from industrial sites (or require industry to implement them) (Guidance Manual for the Preparation of Part 2 of the NPDES Permit Applications for Discharges... EPA 833-B-92-002, Section 8, p 6-17)</p>	<p>The permit has been revised to state that Permittees are to discuss applicable storm water requirements, distribute educational materials, identify facilities that have not submitted an NOI or do not have a SWPPP on site, and follow-up where deemed appropriate.</p>

<p>EAC, Baldwin Park, Bell Gardens, Claremont, Commerce, Covina, Downey, Glendora, Lakewood, Lomita, San Marino, Santa Fe Springs, West Covina, Whittier, El Segundo</p>	<p>Allow for implementation of Public Outreach/Public Participation before the inspection program.</p>	<p>EPA's Final Rule did not encourage sequencing of storm water program elements. EPA stated that to implement Section 402(p)(3) of the CWA, comprehensive storm water management programs which address a number of major sources of pollutants to the system are necessary' (55 FR 222, 48052).</p>	<p>The section has been eliminated and integrated with the Public Information/ Public Participation Section to emphasize focus on educational outreach.</p>
<p>EAC, Downey, Lakewood, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier</p>	<p>Delete the Enhanced Inspection Program</p>	<p>Can consider elimination of this requirement. Use of the enhanced inspection program in the draft Order was left to the discretion of individual municipalities. A Storm Water Inspection Handbook has been developed under State sponsorship. Municipalities may use the handbook to augment the emphasis of the site visit program, on a as needed basis. See <i>California Industrial/ Commercial Stormwater Inspection Handbook for Municipal Agencies</i>, Alameda Countywide Clean Water Program, 1996.</p>	<p>This has been eliminated.</p>
<p>WSPA</p>	<p>Why is industrial waste permit used as a criterion to increase site visit frequency?</p>	<p>Facilities with a local agency industrial waste permit are often visited annually as part of the local agency program. This may provide multiple opportunities for educational contact. However, the Regional Board is sensitive to the observation that this action may constitute a compliance penalty.</p>	<p>The frequency requirement to visit facilities that also have a local agency industrial waste permit has been reduced to once every 24 months.</p>

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WSPA	Who establishes the site visit baseline?	A countywide model for the scope of site visits and BMP lists will be developed by the Principal Permittees in consultation with the EAC, industry and the environmental community. Each municipality will implement the model or a modified version.	The permit has been revised to provide the Principal Permittees 10 months from permit adoption to develop a BMP checklist for use by Permittees after approval by the Regional Board Executive Officer.
Covina	What are categories (i) - (xi)? What is GISP?	These categories are Phase I industrial facilities and are enumerated in federal regulations. GISP is the acronym for General Industrial Storm Water Permit issued by the State for Phase I facilities.	A definition is included in the glossary to describe facilities in Phase I categories (i) - (xi).
Long Beach	Gas stations are arbitrarily chosen.	The USEPA's Phase II evaluation identified automotive service facilities (including gas stations) as having among the highest potential to contribute heavy metals and toxic organic chemicals to storm water discharges to the MS4. Similarly CZARA guidelines identified gas stations as a category of commercial activity that is required to implement BMPs for urban storm water pollution. Partly in response to this designation, the industry has been proactive and has developed recommended BMPs.	The permit has been revised to provide for the development of checklists for use by Permittees. The recommended BMPs developed by the industry can serve as a basis for the checklist for gas stations.



VI. DEVELOPMENT PLANNING / CONSTRUCTION

COMMENTING AGENCIES	COMMENTS	DISCUSSION	ACTION
Prioritization of Development Projects			
Los Angeles Long Beach Building Industry Association (BIA) American Oceans Campaign, NRDC, Tree People NRDC, Heal the Bay California Coastal Commission Heal the Bay	<p>Prioritization criteria ignores storm water impacts associated with proposed development</p> <p>Arbitrary criteria for prioritization is excessive and unwarranted.</p> <p>Prioritization criteria overly expansive in range in covering development / redevelopment projects. The value of a redevelopment project is irrelevant as a trigger criterion.</p> <p>Redefine criteria to state that 40,000 sq ft is High Priority, 10,000-40,000 Priority, and &lt;10,000 Limited Priority.</p> <p>25 percent slope or greater should be under 'High Priority' as negotiated.</p> <p>All projects in Areas of Special Biological Significance should be made High Priority.</p> <p>Projects requiring "grading permits" should be Priority Projects.</p>	<p>Federal guidelines state that, "All construction sites regardless of size must be addressed by the municipality" (USEPA Document No EPA 833-B-82-002, p 6-11.) The prioritization criteria were selected to establish bottom line criteria for cities to review potential water quality impacts during development and redevelopment.</p> <p>Controlling storm water pollutants at the onset of land development has been identified as a cost effective approach to storm water pollution management.</p>	<p>The criteria for prioritization have been generalized to state "Priority Projects are development and redevelopment projects which the Building Official (or equivalent municipal authority) determines may have a potential significant effect on storm water quality."</p>
NRDC, Heal the Bay	<p>Include special requirements for development projects with &gt; 25 (15) parking spaces.</p>	<p>The criteria for determination may be generalized to provide some flexibility.</p>	<p>No action suggested.</p>

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Azusa, Long Beach, La Verne, Whittier	The distinction between significant and non-significant impact is the 5 Ac threshold.	<p>In the municipal program, "all construction sites regardless of size must be addressed" (USEPA Document No. EPA 833-B-82-002, p 6-11).</p> <p>In addition, the Federal 9th Circuit Court of Appeals invalidated the 5 Ac threshold as arbitrary and capricious for NPDES storm water coverage (NRDC v. EPA, 1991). The rule was remanded to EPA for reconsideration.</p>	The criteria for prioritization have been generalized to state "Priority Projects are development and redevelopment projects which the Building Official (or equivalent municipal authority) determines may have a potential significant effect on storm water quality."
EAC, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier	Clarify responsibility and discretion of Public Works Director on Limited Priority projects.	The municipal authority is given the discretion to develop a checklist for potentially significant effect. To promote countywide consistency, it is intended that criteria will be developed by some consensus.	Permit language has been revised to state projects that a "Building Official (or equivalent municipal authority) determines will not have a potential significant impact on storm water quality."
Countywide Guidelines			
Pico Rivers, Santa Clarita	Maintaining existing runoff rate or reducing peak runoff rates do not improve water quality.	"Sediment runoff rates from construction sites are typically 10-20 times greater than agricultural lands, and 1,000-2,000 times those of forest lands.... Runoff from construction sites also can include other pollutants (such as) fertilizer, pesticides, petroleum derivatives, construction chemicals, and solid wastes." (USEPA Document No. EPA 833-B-82-002, p 6-12).	This requirement has been dropped in the permit revision.

Industry	Guidelines are inconsistent with basic erosion control practices. Current city practices require 12% landscaping per parcel developed.	Preamble to the EPA's Final Rule states, that, "municipal permit management programs may not rely exclusively on [existing] erosion or sediment control laws for implementing that portion of management programs that address discharges from construction sites, unless such laws implement NPDES permit program requirements" (55 FR 222, 48052). Current inconsistencies may need to be reviewed in light of water quality concerns.	Permit language under 'Planning Control Measures' has been generalized in the revision to allow the city some flexibility.
SMBRP  Heal the Bay	Clarify if permit requires the development and implementation of Watershed Management Area Plans (WMAFs).  Indicate who has the legal requirement to develop WMAFs and include deadlines.	The WMAF in the draft Order was left for a particular watershed to develop as a permit application for 2001. The countywide program remains the default program. The entity legally required to develop the WMAFs was not specified. The responsibility lies with the Permittees in each WMAF.	The revision states that the Principal Permittee with the Permittees shall develop a WMAF as a permit application for 2001.
Planning Process			
EAC, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier	Separate the Planning and Construction section and components.	This is a format preference issue. Federal regulations for municipal requirements for construction activity include: site planning, BMPs, inspection/ enforcement priorities, and training which are all included in one subsection (40 CFR 122.26(d)(2)(v)(D)).	The format has been simplified in the revision.
La Verne	LA County should follow some democratic process in the development of countywide plans to protect the interests of cities.	This is a subject for discussion in the EAC. The Regional Board staff encourages a cooperative partnership.	No action suggested.
Planning Control Measures			

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NRDC, Tree People	Include provision to evaluate retrofit of existing developments with treatment controls, which appeared in the May 1995 partial draft.	Retrofit of existing developments is a costly undertaking, and may be justified only if persistent water quality problems are identified. It may be an appropriate consideration in the development of the WMAAP.	No action suggested.
NRDC	Require a narrative plan with a description of how BMPs were selected for High Priority and Priority projects.	A narrative plan is required only for High Priority Projects. For Priority Projects, a check list of construction BMPs with a brief explanation can be included.	The revision states that LA County will develop "standard plans and guidelines... for the following development categories: i) a 100+ home subdivision, ii) a 10-home subdivision, iii) a 100,000+ square-foot commercial development, iv) an automotive repair shop, v) a retail gasoline outlet, vi) a restaurant, and vii) a hillside-located single-family dwelling."
EAC, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier	Correlate types of projects to pollutants of concern	Pollutants of concern for the various watersheds are identified in the Water Quality Assessment Report prepared by the Regional Board. However, the list may not be complete because of limited sampling events and data-gaps.	No action suggested.

<p>Ahmanson</p>	<p>Where is the reference to parking lots in the Clean Water Act?</p>	<p>Several studies have demonstrated that parking lots may be significant sources of pollutants such as heavy metals, and petroleum derivatives. The preamble to the EPA Final Rule states that, "The NPDES State has the authority to require a permit by designating storm water discharges such as those from parking lots..." (55 FR 222, 48010). Requiring that pollution from parking lots be addressed through the municipal program is a reasonable alternative as opposed to requiring permits.</p>	<p>No action suggested.</p>
<p>BIA</p> <p>Ahmanson</p> <p>EAC, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier</p> <p>Vernon</p>	<p>Regional Board should ensure that the burden to reduce pollution is equitably distributed among all entities that contribute to NPS pollution. Unlawfully targets new development to improve existing conditions.</p> <p>Regional post construction structural BMPs should be implemented only when water quality problems are identified</p> <p>Post development runoff requirement is not achievable.</p> <p>Post construction BMPs listed are not applicable to most developments.</p>	<p>The draft Order equitably distributes the responsibility of reducing pollutants in storm water discharges to the maximum extent practicable by requiring that illicit discharges; storm water from industrial areas; storm water from commercial areas; and storm water from residential areas be controlled.</p> <p>Reference to specific post-construction BMPs can be deleted.</p>	<p>Reference to specific post-construction BMPs has been deleted in the revision.</p>

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<p>Long Beach, Whittier</p> <p>NRDC</p> <p>California Coastal Commission</p> <p>Los Angeles</p>	<p>Requirement to prepare Mitigation plans for High Priority and Priority projects is unreasonable and excessive.</p> <p>Require a narrative plan with a description of how BMPs were selected for High Priority and Priority projects.</p> <p>Include specific standards for storm water control, e.g., 25 yr, 2 yr 24 hr, etc.</p> <p>BMPs required in plan must be standardized and implementable.</p>	<p>An Urban Storm Water Mitigation Plan is required for High Priority Projects. Most cities already require such projects to submit a plan before issuing grading/ building permits. Storm water considerations can be integrated into the plan, to streamline municipal requirements. A narrative of BMP choice can be included.</p> <p>For Priority Projects, a check list of construction BMPs with a brief explanation of BMP selection can be included.</p> <p>Requirements, checklists, appropriate BMPs and design standards may be developed jointly with BIA and environmental interests</p>	<p>The permit has been revised to state that Urban Storm Water Mitigation Plans are required for priority projects.</p>
<p>Identification of Construction Sites</p>			
<p>Los Angeles</p> <p>Long Beach, Whittier</p> <p>Los Angeles, El Segundo, La Verne, Whittier</p>	<p>Incorporation of prioritization data would require substantial modification to the current data system</p> <p>Database listing is excessive and unreasonable</p> <p>Delete requirement to focus on development of BMPs</p>	<p>Federal regulations and guidance require municipalities to identify the locations of industrial activity, including construction sites, which discharge storm water, and provide an inventory of pollutant sources organized by watershed. NPDES program status will be provided by the Regional Board.</p>	<p>This requirement has been deleted.</p>
<p>Bellflower, El Segundo, Long Beach, Whittier</p>	<p>Information on the State permit coverage of construction sites must be provided by the Regional Board.</p>	<p>The Regional Board will make available to cities information on who has obtained coverage under the state storm water permit, as part of External Agency Coordination.</p>	<p>No change suggested.</p>

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Los Angeles LA County	Define "Project Erodibility" Project Erodibility determination time consuming.	The term in the draft Order was used to indicate if a construction project was situated on a slope with grade of 25 % or more.	The terms and criteria have been deleted in the revision.
Source Inspection			
Alhambra, Culver City, Commerce, Lemita	Staff has not responded to ambiguous issues on inspections and legal authority.	Regional Board Counsel in a memo dated April 17, 1996, responded to legal questions on inspections and municipal authority raised by cities.	The Regional Board Counsel's memo was prepared in response to legal issues raised.
Azusa, Long Beach, La Verne, Whittier  West Covina  NRDC  Los Angeles	Construction sites greater than 5 Ac. should be inspected by the State. Cities should not be required to inspect smaller sites that have a lesser impact. The distinction between significant and non-significant impact is the 5 Ac threshold.  Cities should not be responsible for large construction sites.  Verify NOI is submitted and SWPPP prepared for construction sites 5 Ac or more and deny building/grading permits if none.  Change from inspection program to education site visits.	Federal regulations state that the municipal program for construction sites should include a "description of procedures for identifying priorities for inspecting sites and enforcing control measures which consider the nature of construction activity" (40 CFR 122.26(d)(2)(v)(D)(3)).  EPA also states that the role of large and medium municipalities includes to "Assist EPA (and the NPDES state) in reviewing and evaluating storm water pollution prevention plans that industrial facilities [including construction activity] are required to develop under the general permit" (56 FR 156, 40873).	The permit revision states that no grading permit for developments with disturbed areas five acres or greater will be issued unless the applicant can show that 1) a Notice of Intent (NOI) to comply with the State Construction Activity Storm Water Permit has been filed and 2) a Storm Water Pollution Prevention Plan (SWPPP) has been prepared.

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VII. PUBLIC AGENCY ACTIVITIES

COMMENTING AGENCIES	COMMENTS	DISCUSSION	ACTION
General			
LA County NRDC	Suggest that Principal Permittee be given 16 months to develop model, and that each permittee submit a schedule for implementation of the model 4 months after EO approval  Time allowed for development of model program by the Principal Permittee and implementation by permittees is too long.	A revised timeline to allow the Principal Permittee to develop model and for Permittees to begin implementation will be included in the revision.	16 months are provided to develop a model and each permittee submits a schedule for implementation of the model 4 months after EO approval of model.
LA County	The County cannot agree to an evaluation of public agency activities by all permittees. It will conduct a limited and focused assessment.	A limited and focused assessment that includes participation by other Permittees will be sufficient.	The Principal Permittee in consultation with the Permittees will evaluate public agency activities jointly.
Long Beach	What is the reason for requiring public agency activities to reduce storm water pollutants?	Federal regulations require that municipalities develop programs to control storm water pollution from specified municipal activities that have a high potential for contaminating storm water. See 40 CFR 122.26 (d)(2) (iv) (3) - 122.26 (d)(2) (iv)(7).	No action necessary.
Los Angeles	Requirements cannot be met during emergency situations involving essential public services. Recognize such situations in the permit.	Language will be included in the revision to recognize exceptions to meeting public agency requirements during emergencies.	The Order requires that the model Public Agency program include an "emergency" element.

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<p>Heal the Bay</p> <p>Valencia Co, BIA, NRDC</p>	<p>Reinsert the requirement terms "shall" and "will" consistent with the September 1995 partial draft.</p> <p>Hold municipal activities to a standard equivalent to the private sector. Why is there a separate section for public construction activities?</p>	<p>Alternative language will be included in the revision to be consistent with the intent of the Order to hold the public sector to an equivalent level of performance.</p> <p>A separate sub-section for public construction activities is included to promote permit streamlining. Each Permittee has the option to seek coverage under this permit for public construction activities presently covered by a separate state general permit, if they develop a program to implement SWPPPs and other general permit requirements.</p>	<p>This has been revised to reflect the comments.</p>
<p><b>Sewage Systems</b></p>			
<p>Calabasas</p> <p>Vernon</p>	<p>Exempt cities who contract with sanitation districts from any requirements to develop and implement procedures for sewage system operations.</p> <p>What are the responsibilities of the sanitation districts, who are not permittees to this Order.</p>	<p>Most sanitation districts are not a party to this permit. However, Permittees do contract or have similar agreements with sanitation districts to provide sewage treatment services in their areas. A condition to manage sewage systems within the Permittees area consistent with sewage systems BMPs may be included in the agreements for services.</p> <p>The sanitation districts must comply with their NPDES Permit conditions.</p>	<p>No change necessary.</p>
<p>NRDC</p>	<p>Add requirement to develop "procedures to close beaches if necessary..."</p>	<p>Language to develop include beach closure procedures will be added to the revision.</p>	<p>This is included under Sewage Systems Operations.</p>

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<b>Public Construction</b>			
LA County	The county will not coordinate other Permittees' compliance with the general construction activities storm water permit. Modify language.	Language will be revised to allow each Permittee to develop a standard procedure if it chooses to be covered for public construction activities under this permit rather than the state general permit.	This has been incorporated.
La Verne Santa Clarita Calabasas	Clarify purpose of this sub-section. What is the responsibility of the permittee in a public construction project. Allow self-monitoring by permittees. Extend the requirements of this sub-section to all sites identified in the Section 'Development Planning/ Construction', not just to sites 5 acres or more.	The requirements in this sub-section extend to all public construction projects that meet the criteria in the Development Planning/ Construction section. The Permittee is expected to implement a program to ensure that public construction projects meet the same design and BMP standards required of private projects. The 5 acre or greater threshold is to offer alternative coverage under this permit for public construction projects presently covered under the state construction activity general permit.	No action necessary.
<b>Vehicle Maintenance</b>			
LA County	Clarify the 'ten or more vehicles' used to qualify fleet vehicle maintenance. Is it per day, number of service bays, etc.	The language will be revised to state 'ten or more vehicles per day'.	Ten or more vehicles per day is the standard. Included in Order.
Los Angeles	Requirement to conduct vehicle washing in specially equipped areas will be costly. Alternative language is proposed.	Language will be revised to allow control to the maximum extent practicable of discharges from vehicle washing areas.	The Order allows flexibility for vehicle and equipment washing.

<b>Parks/ Recreation Facilities</b>			
Santa Clara	Clarify 'preferred use' as applied to pesticides, herbicides, and fertilizers.	Language will be modified to state, "selective and environmentally responsible use".	Order revised to incorporate comment.
Santa Clara	Why does the discharge of municipal swimming pool waters need a separate NPDES permit?	Swimming pool discharges at times contain residual chlorine which are toxic to aquatic life. Municipal swimming pool discharges as a matter of past Regional Board policy have been required to obtain an individual permit.  Swimming pool discharges are allowed under this permit if Permittees implement BMPs to reduce chlorine to acceptable levels before it reaches receiving waters. Filter back-wash should be discharged to the sanitary sewer (with the sewer agency's approval).	Revisions to the Order incorporate discussion.
<b>Storm Drain Operation and Maintenance</b>			
La Verne	Eliminate requirement to investigate the feasibility of dry weather flow diversion.	Dry-weather flow diversions may be appropriate in certain circumstances, such as consistently polluted dry flows. In these situations, diversion to the sanitary may be the most cost efficient method to protect public health.	No change.
Covina	Provide reasons to record the quantity of catch basin waste collected.	The quantification of catch-basin wastes can provide an estimate of the amount of waste that has been prevented from reaching the water-courses and beaches. It is a substitute measure of program implementation and effectiveness. It can help identify areas of high accumulation which can become candidates to focus BMPs.	No action suggested.

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<b>Streets and Roads</b>			
Southern California Contractors Association	Requirements for municipal streets and road maintenance are less restrictive than those imposed on private businesses.	The intent is to hold public agency activities to the same level of performance as private sector activities.	The discussion and comment have been incorporated into the Order.
<b>Flood Control</b>			
LA County	Integrate the Flood control subsection with Storm Drain Maintenance because of their similarity.	The two subsections will be integrated in the revision.	Comment has been incorporated into the Order.
<b>Parking Facilities</b>			
Carson  Vernon  Building Industry Association	Requirement to clean Permittee owned parking lots with 25 or more parking spaces will be costly if it will involve steam cleaning.  How are Permittees expected to enforce the requirements on parking lots?  Why is the requirement for Permittee owned parking lots greater than a requirement to remove debris on non-permittee owned	Several studies indicate that parking lots with urban vehicular traffic produce significant quantities of storm water pollutants. Permittee owned parking lots are required to periodically clean to reduce the potential for contamination of storm water. No reference is made to 'steam cleaning' as the only acceptable method of reducing this potential.  Permittees are expected to include periodic cleaning activities in their program for permittee owned parking lots.	No change.

Public Industrial Activities			
Santa Monica	Support allowing municipalities to cover their industrial facilities under this permit. Also include non-storm water utility discharges to the MS4.	<p>Permittees may seek coverage under this permit for their facilities presently covered under the state general industrial permit, if they develop a program to notify, implement SWPPPs, and meet other requirements.</p> <p>Non-storm water discharges to the MS4, including those from public utilities, may be allowed under this permit provided adequate BMPs have been developed and are implemented. See the 'Wicil Connections/ Discharges: Non-storm Water Discharges'.</p>	No action.

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VIII. PROGRAM REQUIREMENTS FOR PUBLIC INFORMATION AND PARTICIPATION

COMMENTING AGENCIES	COMMENTS	DISCUSSION	ACTIONS
Public Information and Participation			
Downey, Paramount, West Covina  EAC, BIA, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivers, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier	The public education section of the permit is very important and should be implemented prior to the implementation of the other requirements in the permit.  Public education and the development of Storm Water Management Plans do not include public participation.	Public education is one of several BMPs necessary to reduce storm water pollution. However, a comprehensive storm water management plan will include several parallel efforts to control storm water pollution.  Public participation and input during public education program development is very important to its success. Permittees are encouraged to seek public input in developing the public education component.	No change suggested.
Alhambra, Bellflower, Lomita, San Marino, Whittier, Long Beach, Manhattan Beach	The RWQCB has no authority to compel cities to contribute a "fair share" (which is not defined), to a public education program that is to be developed in the future by the Principal Permittee.	A fair share simply referred to participation in the development of the Public Education Program. Language will be modified to indicate participation.	Language has been changed to "expected to work collaboratively"
Los Angeles, Bellflower, El Segundo, La Verne, Hermosa Beach, Sierra Madre, Signal Hill, South El Monte, South Gate, Bellflower  Heal the Bay	What type of "analysis" of residents and businesses is the City to conduct to identify outreach goals and target audiences? How detailed must it be?  The second objective of the PIPP program should be to measurably change the behavior of target audiences by encouraging those audiences to implement appropriate solutions.	The "analysis" intended is an objective survey by the municipality to identify opportunities for public education. The City and County of Los Angeles have already undertaken elaborate surveys. The other Permittees may need to only build on this information.	Have eliminated the term "analysis."  The suggested modification of the second objective will be made.

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<p>Long Beach, Los Angeles</p>	<p>Immediate Outreach. Is this section part of the SWAMP or the CSWAMP?</p> <p>What if a Permittee has an established educational program for some of the program requirements specified? Must the Permittee change their program to fit the CSWAMP?</p>	<p>This is a requirement of the Order and components of the CSWAMP, and the WMAPs.</p> <p>The established educational program for a specific requirement, if it covers the essential purpose of the requirement, may be sufficient. However, the Permittee must develop or co-develop and implement any requirements not met by the current educational program in place.</p>	<p>No change suggested.</p>
<p>Calebasas</p>	<p>Permit should include curriculum materials and training for teachers.</p>	<p>Permittees who work well with their school districts, are encouraged to consider the suggestion. Others have commented that they have no control over school districts.</p>	<p>The Order encourages the acquisition and distribution of classroom materials to educators.</p>
<p>Covina</p> <p>Vernon</p> <p>Bellflower, El Segundo</p>	<p>The County should be responsible to produce or acquire a video for presentation, not the Permittees.</p> <p>Smaller cities should solely be responsible for distributing educational materials within its respective jurisdiction.</p> <p>Audio Materials should be done Countywide and not necessarily be each Permittee.</p>	<p>Each city is required to have educational materials available for its residents and businesses. The materials may, however, be developed in any manner that is cost-effective as determined by Permittees. Permittees may work-out the desired partnership with the County to acquire educational materials.</p>	<p>No change suggested.</p>

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IX. MONITORING

COMMENTING AGENCIES	COMMENTS	DISCUSSION	ACTION
<p><b>Critical Sources Monitoring</b></p> <p>EAC, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier</p> <p>Los Angeles County</p> <p>Los Angeles</p> <p>Long Beach</p>	<p>An arbitrary number of critical sources has been selected for monitoring by permittees without justifying need.</p> <p>The critical sources/ BMP evaluation should not be restricted to only structural BMPs. Language should be revised to consider all appropriate BMPs.</p> <p>The regulating agency should be primarily responsible for evaluating critical sources (industrial/commercial sources and BMP effectiveness). Eliminate the requirement as proposed.</p> <p>The requirement to monitor five additional critical sources in addition to those to be conducted by the principal permittee is excessive and unwarranted.</p>	<p>Federal regulations require all MS4 permittees to "monitor and collect quantitative data on storm water pollutants in MS4 discharges" [122.26(d)(2)(ii)]. In addition, permittees must also "develop a monitoring program for storm water discharges from industrial sites" [122.26(d)(2)(iv)(C)(2)], and "estimate reductions in pollutant loads as a result of program implementation" [122.26(d)(2)(v)].</p> <p>The federal regulations require each municipality with a population of 100,000 or greater to implement all monitoring components. While the permit requires LA County to implement the majority of the monitoring components, it appears reasonable to require the other 86 permittees to undertake at least one special/ pilot project per watershed (for a total of six) to assess or mitigate storm water, non storm water pollution, program effectiveness, or any other assessment of the objectives of the storm water program. Any appropriate BMP may be evaluated as part of the special/ pilot project.</p>	<p>This sub-section in the permit has been eliminated at Permittees request.</p>

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<p>SMBRP</p> <p>Heal the Bay</p>	<p>Clarify the criteria to be considered when implementing specific critical sources monitoring projects.</p> <p>Criteria for selecting critical sources projects should include annual reports submitted by Phase 1 Industries to the Regional Board</p>	<p>The general objective of the critical sources/ BMP monitoring is to identify sources of pollutants of concern and develop cost effective methods to minimize storm water/ non storm water pollution.</p> <p>For watershed special projects, it was expected that permittees would utilize criteria that consider the conditions in the watershed when deciding on the special project.</p>	<p>This sub-section in the permit has been eliminated at Permittees request.</p>
<p>General Comments</p>			
<p>EAC, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerca, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hemosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier</p> <p>South Gate, Signal Hill, So. El Monte, Sierra Madre, Hemosa Beach</p> <p>SMBRP</p>	<p>There appears to be no relationship between the monitoring program and the storm water management program in the Order.</p> <p>Permittees should be given the discretion to implement a comprehensive monitoring strategy.</p> <p>Ensure that the proposed monitoring program is linked to WMAP implementation</p>	<p>The storm water management program is expected to draw on information gathered through the monitoring program to make improvements or emphasize implementation efforts. The WMAP can serve as the plan that incorporates such changes. However, the WMAP will be developed only after the CSWMP is completed, a period likely to take 4 years.</p> <p>The current monitoring program in large part was designed by experts brought together by LA County and NRDC. It is comprehensive and when implemented will measure the propensity of types of land use to generate pollutants of concern, monitor long term trends in storm water pollutant loads, evaluate specific activities and practices to mitigate storm water pollutants, and assess impacts on the receiving waters.</p>	<p>The permit revision provides for modifications and amendments to be made to the monitoring program after approval by the Executive Officer, annually.</p>

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Los Angeles County	The County cannot agree to summarize and interpret data from all surface water monitoring programs in the county area. This task is the responsibility of the Regional Board.	The statement in the permit was in error and will be corrected. The intent is to describe methods used to collect, analyze, and interpret storm water data in LA county.	The statement has been corrected, and the Monitoring Plan subsection appropriately modified.
Heal the Bay, SBRP Technical Advisory Committee	The constituent monitoring list from the County's current monitoring program should be included. In addition, add diazinon, chlorpyrifos, diuron, malathion, simazine, total DDT, total PCBs. VOCs which provide little useful information may be eliminated. Also indicate standard analytical methods.  Require sampling of all four mass emission sites over the five year permit term. Sampling for just two years is insufficient to establish long term trends.	The constituent monitoring list with standard analytical methods to be used can be included as an appendix. The pesticides and PCB can be added to the list of constituents, if the cost to the monitoring program is modest or can be offset by removing other constituents.  Long term trends cannot be established in two years. Mass emission stations will be required to continue sampling through the permit term, but with fewer station events after the first two year period.	The constituent monitoring list with analytical methods has been added to the Appendix. Suggested constituents have been added to the list of pollutants of concern. VOCs monitoring has been made optional.  The monitoring at mass emission stations has been revised to require continuation once initiated, although the number of station events after the first year of monitoring has been reduced.
Natural Resources Defense Council	Include dates for public review and Executive Officer approval of monitoring program task submittals.	Appropriate dates will be included in the revision.	Appropriate dates have been included for submittal of monitoring program tasks, and Executive Officer's approval.
The Valencia Company	The monitoring program should identify the impacts of storm water on receiving waters to establish the need for structural BMPs	The proposed comprehensive monitoring program will evaluate the impact on receiving waters.	No action suggested.

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<p>Claremont, Long Beach, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier</p>	<p>Pollutants of concern are not identified in the Order.</p>	<p>Pollutants of concern are to be identified as a requirement of the monitoring program that the Principal Permittee will be implementing.</p> <p>Pollutants of concern can be found in the Findings of the Order and in the Water Quality Assessment (WQA) completed by Regional Board staff. This "WQA" is available from the Regional Board Planning Unit.</p>	<p>The Order requires that an objective of the monitoring program is to identify pollutants of concern.</p>
<p>Santa Clarita</p>	<p>Clarify the role of Santa Clarita in monitoring activities in the Santa Clara River WMA.</p>	<p>The exact nature of participation in the comprehensive monitoring activities should be worked out between the two municipalities in this watershed.</p> <p>It was expected that the city would perform a pilot project/special study to assess or mitigate storm water, non storm water pollution, program effectiveness, or any other assessment of the objectives of the storm water program. This could have also been done in cooperation with the Ventura County Storm Water Program Permittees, who represent the lower part of the watershed.</p>	<p>The pilot project/special study section in the permit has been eliminated at Permittees request.</p>

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X. PROGRAM REQUIREMENTS FOR PROGRAM EVALUATION AND REPORTING

Commenting Agencies	Comments	Discussion	Actions
<p>Alhambra, Bellflower, Carson, EAC, Commerce, El Segundo, Culver City, Lakewood, Lomita, Long Beach, San Marino, Whittier</p> <p>EAC, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier, Long Beach</p> <p>EAC, Downey, Glendale, Inland, La Mirada, La Verne, Palms Verdes Estates, Santa Fe Springs, West Covina</p> <p>Long Beach</p>	<p>Reporting required to show compliance with the Order is too excessive.</p> <p>Limit annual report to summary information.</p> <p>MEP standard cannot be achieved. It is too burdensome to show that a BMP has been implemented to the MEP.</p> <p>We understood all elements of the Order were to be implemented to the maximum extent practicable, not just selected elements. This phrase is frequently neglected.</p>	<p>Reporting requirements have been reduced from semi-annual reports to annual reports. Permittees are being required to submit sufficient information so that progress with the requirements of this Order can be determined by the regulating agency.</p> <p>It is not meant that each BMP shall be implemented to the MEP. This is a common misuse of the term Maximum Extent Practicable. MEP refers to a storm water management program as a whole and not for individual BMPs.</p> <p>Maximum Extent Practicable is the standard for implementation of storm water management programs, taken as a whole, to reduce pollutants in discharges to the maximum extent practicable. It is the maximum extent possible taking into account equitable consideration and competing facts, including, but not limited to, the gravity of the problem, public health risk, societal concern, environmental benefits, pollutant removal effectiveness, regulatory compliance, public acceptance, implementability, cost and technical feasibility. MEP refers to storm water management programs as a whole and not for individual BMPs.</p> <p>Permittees are expected, under Section 402(p) of the Clean Water Act, to demonstrate that the Permittees storm water programs are reducing pollutants in storm water to the Maximum Extent Practicable.</p>	<p>The Reporting requirements in this section have been consolidated to provide Permittees time and flexibility to demonstrate compliance.</p> <p>The glossary includes the term Maximum Extent Practicable.</p>

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<p>Bell Gardens, Carson, Covina, Downey, EAC, El Segundo, Glendale, Inwindale, La Mirada, La Verne, Long Beach, Palos Verdes Estates, Pico Rivers, Rosemead, Santa Clarita, Santa Fe Springs, Torrance, West Covina</p>	<p>Dates for compliance too soon.</p> <p>Consider suggestion that program implementation be predicated on a given number of months after Permit adoption.</p> <p>Also allow for delays in approval by the Executive Officer..</p>		<p>The Order reflects the comments received.</p>
<p>Bell Gardens, Carson, Covina, Downey, EAC, El Segundo, Glendale, Inwindale, La Mirada, La Verne, Long Beach, Palos Verdes Estates, Pico Rivers, Rosemead, Santa Clarita, Santa Fe Springs, Torrance, West Covina</p> <p>LA County</p>	<p>Pilot projects are not possible for each BMP.</p> <p>Watershed BMPs require greater effectiveness scrutiny than county-wide BMPs.</p>	<p>Pilot projects are recommended to demonstrate effectiveness of watershed BMPs prior to a full scale implementation.</p> <p>There is no intent to increase the scrutiny for watershed BMPs, unless they are presented as a substitution to a countywide program.</p>	<p>These requirements have been eliminated at Permittees' requests.</p>
<p>Carson, EAC, City of LA, County of LA, La Verne, West Covina, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hemmoa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivers, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier</p> <p>Calabasas and Malibu Creek Cities</p>	<p>Performance standards should be deleted entirely or not included until the next permit is adopted (2001).</p> <p>Performance standards should be approved by City Council first.</p>	<p>Performance standards are intended to be self-suggested goals for the countywide program or a watershed. Such standards may be useful to demonstrate compliance with the MEP standard.</p>	<p>The permit has been revised to provide Performance Standards will be developed for the next Permit in 2001 at Permittees request.</p>

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XI. GENERAL COMMENTS

Commenter	Comment	Discussion	Action
EAC, Alhambra, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Culver City, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier, Downey, La Mirada, La Verne, Manhattan Beach, Long Beach  Calabasas	Permit is too long, complex, ambiguous, contradictory, and poorly structured. Recommend hiring a consultant to format and finalize permit.  A summary of Principal Permits and Permittees Requirements with due dates should be created.  Need an index for the Order.	The December 18, 1995 draft was sent to cities to provide an early opportunity for input on the permit. Many aspects of the permit were not finalized.	The Order has been reviewed for structure and is now in a format that is more consistent and readable than the December 18, 1995 version. The Order contains tables at the beginning of each major section which provide a summary of requirements and show who needs to implement what and when.  Additionally, a table of contents has been included for easy identification.
Building Industry Association, Santa Monica	Supports watershed management approach		No action necessary.
Culver City, Long Beach, La Mirada	Board's intent is not reflected in the Order language. Goals/objectives are not adequately addressed in the Order.	The objective of the program is to reduce pollutants in storm water discharges to the maximum extent practicable.	This is identified at the beginning of Part 2 of the Order.
EAC, Azusa, Claremont, Culver City, Downey, Glendale, Glendora, La Mirada, La Verne, Palos Verdes Estates, Torrance, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Downey, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Palos Verdes Estates, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, Torrance, West Covina, West Hollywood, Westlake Village, Whittier  State Senator Tom Heyden, California Coastal Commission, American Oceans Campaign, Santa Monica Bay Keeper, Natural Resources Defense Council	Deadlines/compliance dates are unrealistic. Compliance dates too soon.  Lacks understanding of local government decision making and budgeting process.  Compliance dates are too long considering there are requirements from the first permit adopted in June 1990.	The compliance dates within the December 18, 1995 draft were put in for comment purposes.	The due dates have been changed and are based upon the date of adoption of this Order.  Acknowledging that some requirements were required under the first Order, some requirements are more specific now as compared to the first Order.

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<p>Assemblymember Shell Kushi, Heal the Bay, American Oceans Campaign, Santa Monica, Malibu</p> <p>Western States Petroleum Association</p>	<p>Strongly endorse the draft Order.</p> <p>Strongly support implementation of appropriate BMPs at retail gasoline outlets to reduce pollutants to the MEP.</p>		<p>No action necessary.</p>
<p>EAC, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier</p>	<p>The certification signature by a principal executive officer or ranking elected official required as part of standard provisions is not practical.</p>	<p>This is a federal requirement under 40 CFR 122.22(b) for reports or other information required by a permit.</p>	<p>No action necessary.</p>
<p>American Oceans Campaign, Santa Monica Bay Keeper, Natural Resources Defense Council, Valencia Company, Building Industry Association,</p>	<p>Public input should be gained prior to amending any requirements under this Order.</p>	<p>This is identified in Section I.H of this Order.</p>	<p>No action necessary.</p>
<p>Ahambra, Azusa, Beverly Hills, Bradbury, Calabasas, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Los Angeles, Manhattan Beach, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, Torrance, West Covina, West Hollywood, Westlake Village, Whittier, Claremont, Commerce, La Verne</p>	<p>Expand Glossary of terms.</p> <p>Include acronyms.</p>		<p>The glossary has been expanded. Additionally many acronyms have been included.</p>
<p>Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Long Beach, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier, EAC, La Mirada</p>	<p>The CSWMP and WMAPs are not specifically defined. There are unknown requirements to be imposed in the future if not stated clearly in the Order.</p>	<p>It is imperative that each Permittee play a proactive role in the development of the programs required under this Order. See Regional Board Counsel's memorandum, comment no. 8.</p>	<p>The CSWMP and WMAPs are explained in the General Requirements section of Part 2 of the Order and in the glossary.</p>

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<p>EAC, Building Industry Association, Commerce, Long Beach, Bellflower, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerce, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier</p> <p>Long Beach</p>	<p>Comment period inadequate considering length of permit.</p> <p>Another draft should be generated before tentative permit.</p> <p>Regional Board staff has not been responsive to questions/comments in early drafts of the permit.</p>	<p>Review periods for this Order have surpassed 60 days and will exceed 100 days when complete. Federal law requires only a 45 day review period for such Orders. In total, over 17 months will have passed from the time that the earliest draft circulated for comments (February 14, 1995) and the date that the tentative Order goes before the Regional Board for consideration (July 15, 1996). All drafts have been available to the Permittees at any given time. Although it may be desirable to provide additional review time, any more beyond the one 45-day comment period cannot be provided and still meet the July 15, 1996 target for adoption. Other major metropolitan areas (Sacramento, Orange County, and San Francisco Bay) have already adopted a municipal storm water permit.</p> <p>The revised tentative is responsive to the comments received and reflects many discussions and input from multiple agencies. Regional Board staff has carefully considered comments received in preparing the tentative permit. The December 18, 1995 draft is the first complete permit draft distributed. Regional Board staff have made every effort to be fully responsive.</p>	<p>No action.</p> <p>No action recommended.</p>
<p>La Verne</p>	<p>The Principal Permittee is charged with developing permit requirements which must be implemented by the Permittees. Will Permittees be forced to comply with Principal Permittee developed programs for which their involvement may be limited or for which they do not agree?</p>		<p>Language throughout the Order requires that the Principal Permittee in consultation with the Permittees develop identified programs. Permittees have the ability to make appropriate local modifications when implementing the model programs</p>



Commerca	Regional Board staff has not been forthcoming in responding to questions from Permittees regarding gray areas of the Permit.	Regional Board staff have made every effort to clarify the language used within the Order and to eliminate any gray areas.	No action.
Claremont, Long Beach, Azusa, Beverly Hills, Bradbury, Carson, Cerritos, Commerca, Diamond Bar, Baldwin Park, Bell Gardens, Claremont, Covina, Glendale, Glendora, Hermosa Beach, Industry, Lomita, LACDPW, Norwalk, Pico Rivera, Rolling Hills, Rosemead, San Dimas, San Marino, Santa Clarita, Santa Fe Springs, West Covina, West Hollywood, Westlake Village, Whittier	Pollutants of concern are not identified in the Order.	Pollutants of concern will be better identified, as a requirement of the monitoring program that the Principal Permittee will be implementing.  Pollutants of concern can be found in the Findings of the Order and in the Water Quality Assessment (WQA) completed by Regional Board staff. This "WQA" is available from the Regional Board Planning Unit.	The Order identifies pollutants of concern within the Findings.
Bellflower, Downey, El Segundo, Long Beach	Regional Board should consider the new USEPA document "Nonpoint Source Program and Grants Guidance for fiscal Year 1987"	This document was reviewed by Regional Board staff. The comments by the Permittees are well taken. The document provides non-point source program direction. The NPDES program is a point-source program. The document is used by our Planning Unit staff for contracts and planning purposes. Regional Board staff among different units work on separate but similar programs and projects which may affect the Permittees under this Order. Regional Board staff will confer among each other as much as practicable to achieve greater effectiveness and efficiency and attempt to eliminate any overlap.	No action necessary.

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

**FACTSHEET  
FOR  
ORDER NO. 96-XXX  
(NPDES NO. CAS614001)**

**WASTE DISCHARGE REQUIREMENTS  
FOR  
MUNICIPAL STORM WATER AND URBAN RUNOFF DISCHARGES  
WITHIN THE COUNTY OF LOS ANGELES**

**Public Notice No. 96-XXX**

**PERMITTEES:** County of Los Angeles and 85 Cities in the County (See Attachment A, List of Permittees).

**DISCHARGE AREA:** Cities and incorporated areas in the County of Los Angeles under the jurisdiction of the California Regional Water Quality Control Board, Los Angeles Region (See Attachment B, Map of the Permitted Area in Los Angeles County).

**DISCHARGES:** Storm Water and Urban Runoff

**RECEIVING WATERS:** Santa Monica Bay, Los Angeles Harbor, Long Beach Harbor, San Gabriel River, Los Angeles River, San Pedro Bay, Santa Clara River, and their tributaries; and other water bodies in Los Angeles County.

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I. PUBLIC INVOLVEMENT OPPORTUNITIES

A. Public Comment Period

Regional Board staff requests written comments on the tentative waste discharge requirements (permit) by June 26, 1996. This will give staff time to review and consider the comments, respond to them, and/or resolve major issues prior to the Regional Board consideration of the tentative permit.

Written comments should be addressed to:

California Regional Water Quality Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754

Attn: Carlos Urrunaga

B. Public Workshop

Regional Board staff has scheduled a public workshop as follows:

Date: June 18, 1996

Time: 9:30 a.m.

Location: Los Angeles City Hall  
Board of Public Works Hearing Room  
200 North Spring Street  
Los Angeles, California

At the workshop, Regional Board staff will explain the need for and requirements of the permit. The public will have the opportunity to ask questions of and converse with Regional Board staff members concerning the proposed permit. This is an informal process.

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C. Public Hearing

The tentative permit is scheduled for the Regional Board's consideration, during a public hearing on the following date, time, and place.

Date: July 15, 1998

Time: 9:00 a.m.

Location: County of Los Angeles  
Board of Supervisors Hearing Room  
Corner of South Grand Avenue and West Temple Street  
Los Angeles, California

Interested persons are invited to attend.

At the public hearing, Regional Board staff will once again explain the need for and requirements of the permit. Then an opportunity for formal public comment will commence. Regional Board staff will not be able to respond to comments or questions during the public hearing unless directed by the Board. The Board will hear any testimony pertinent to the waste discharges and the tentative waste discharge requirements. Oral statements will be heard; however, for accuracy of the record, all important testimony should be in writing.

D. Information and Copying

Persons wishing further information may write to the above address or call Carlos Urrunaga at (213) 266-7598. Copies of the application, proposed waste discharge requirements, and other documents are available at the Regional Board office for inspection and copying by appointment scheduled between the hours of 10:00 a.m. and 4:00 p.m., Monday through Thursday (excluding holidays).

E. Register of Interested Persons

Any person interested in being placed in the mailing list for information regarding this permit should write to the Regional Board, Attention: Carlos Urrunaga.

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II. BACKGROUND

A. The Storm Water Problem

Storm water runoff is acknowledged as a source of pollution that can damage important water resources, including streams, lakes, estuaries and wetlands, and ground water. Many recent studies have shown that runoff from urban areas typically contains significant quantities of the same general types of pollutants that are found in wastewater and industrial discharges and often causes similar water quality problems. These pollutants include heavy metals (e.g., chromium, cadmium, copper, lead, mercury, nickel, zinc), pesticides, herbicides, nutrients, bacteria, and synthetic organic compounds such as fuels, waste oils, solvents, lubricants, and grease.

In addition, the large impervious surfaces in urban areas increase the quantity and peak flows of runoff, which in turn cause hydrologic impacts such as scoured streambed channels, instream sedimentation, and loss of habitat. Furthermore, because of the enormous volume of runoff discharges, mass loads of pollutants in stormwater can be significant.

There are multiple of pollution sources that contaminate stormwater, including land use activities, operation and maintenance activities, illicit discharges and spills, atmospheric deposition, and vehicular traffic conditions. Many of these sources are not under the direct control of the permittees that own or operate the storm sewers. Impacts from storm water are highly site-specific and vary due to differences in local land use conditions geography, hydrologic conditions, and the type of receiving water.

[Source: *Guidance Manual for the Preparation of Part 2 of the NPDES Permit Applications for Discharges from Municipal Separate Storm Sewer Systems*, United States Environmental Protection Agency (USEPA) # 833-B-92-002, 1992].

B. Clean Water Act Amendments of 1987 and Subsequent Rulemaking by USEPA

Amendments to the Clean Water Act (CWA) in 1987 established new statutory requirements to control industrial and municipal stormwater discharges to waters of the United States [CWA Section 402 (p)]. The amendments require NPDES permits for storm water discharges from Municipal Separate Storm Sewer Systems (MS4s) to waters of the United States. Section 402(p)(3)(B) requires that permit for MS4s:...."(i) may be issued on a system- or jurisdiction-wide basis; (ii) shall include a requirement to effectively prohibit non-storm water discharges into the

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storm sewers; and (iii) shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques and systems, design and engineering methods, and such other provisions as the Administrator or the State determines appropriate for the control of such pollutants."

On November 16, 1990, pursuant to Section 402(p) of the CWA, the USEPA promulgated 40 Code of Regulations (CFR) Part 122.26 which established requirements for storm water discharges under the NPDES program. The regulations recognize that certain categories of non-storm water discharges may not be prohibited if they have been determined to be not significant sources of pollutants.

C. State Storm Water Permits

To facilitate compliance with federal regulations, in 1992 the State Water Resources Control Board (State Board) issued two statewide general NPDES permits: one for storm water from industrial sites [NPDES No. CAS000001, General Industrial Activities Storm Water Permit (GIASP)] and the other for storm water from construction sites [NPDES No. CAS000002, General Construction Activity Storm Water Permit (GCASP)]. "Industrial Activities", as defined in 40 CFR § 122.26(b)(14)(i) through (xi), and construction activities with a disturbed area of five acres or more are required to obtain individual NPDES permits for storm water discharges, or be covered by these statewide general permits by completing and filing a Notice of Intent with the State Board.

The State Board adopted a dual annual fee structure for industrial facilities and construction sites covered by these two general permits. Industrial facilities and construction sites located in jurisdictions with a Municipal Separate Storm Sewer System (MS4) permit are subject to a lower annual fee (\$250) than those located in jurisdictions without a MS4 permit (\$500). The intent of the dual fee structure was to allow Permittees to recover the annual fee differential or portion thereof if necessary to support the MS4 program and also provide some oversight over these facilities.

D. Permitting Authority

The proposed permit will be issued by the California Regional Water Quality Control Board, Los Angeles Region.

The Federal Clean Water Act allows the USEPA to delegate its NPDES permitting authority to the states with an approved environmental regulatory program. The

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State of California is one of the delegated states. The Porter-Cologne Act (California Water Code) authorizes the State Board, through its Regional Boards, to regulate and control the discharge of pollutants into waters of the State and tributaries thereto.

As a delegated State, pursuant to Section 510 of the CWA and 40 CFR Part 123.25, the State may impose more stringent requirements necessary to implement water quality control plans for the protection of beneficial uses of receiving water, and/or to prevent nuisance.

III. **THE COUNTYWIDE MUNICIPAL STORM WATER/URBAN RUNOFF PERMIT FOR THE COUNTY OF LOS ANGELES**

A. **Order No. 90-079 (NPDES Permit No. CA0061654)**

To comply with the CWA mandate, the Los Angeles Regional Board issued the first storm water permit (Order No. 90-079) on June 18, 1990, to the municipalities (Permittees) in Los Angeles County. Because of the complexity and networking of the storm drain system and drainage facilities within and tributary to the County of Los Angeles, the Regional Board adopted a countywide approach in permitting storm water and urban runoff discharges. The County of Los Angeles has been designated as Principal Permittee under that permit. As Principal Permittee, the County is responsible for the general administration of the permit and facilitate cooperation among Permittees.

B. **Report of Waste Discharge (ROWD) and the Renewal Process**

On December 21, 1994, the County of Los Angeles in coordination with 85 cities submitted a Report of Waste Discharge as an application for renewal of the 1990 permit.

In drafting the proposed permit, Regional Board staff worked with a committee of stakeholders (known as the "negotiating group") comprised of representatives of Permittees and environmental groups. The negotiating group was convened in early 1995 and met two to three times a month through the fall of 1995 to identify areas of agreements, narrow areas of disagreements, and develop language for the renewal permit. In September 1995, a partial draft of the permit was distributed for comments to the Permittees, environmental groups, and other interested business organizations. A number of issues were raised in the comments, which Regional Board staff considered. A complete draft of the permit was distributed for comments in December 1995. Regional Board staff received a large number of comments from the Permittees, environmental groups, business

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communities, state officials, and the public. After review and consideration of the comments, Regional Board staff met with Permittees' Watershed committees, Permittees' attorneys, City elected officials (collectively and individually), environmental groups, and representatives of business organizations to discuss the requirements, respond to the comments, and resolve issues of disagreement. Enclosed is the written response to those comments.

The proposed permit (tentative Order) is the result of all those discussions and consideration of federal and state regulations.

C. Permitted Area and Receiving Water Bodies

The permitted area includes all areas within the boundaries of the cities as well as unincorporated areas in the County of Los Angeles within the jurisdiction of the Los Angeles Regional Board except the City of Avalon. The Permittees serve a population of about 11.4 million (1990 Census of Population and Housing, Bureau of the Census, U.S. Department of Commerce) in an area of approximately 3,100 square miles. Attachment B is a map of the Permitted Area in the County of Los Angeles.

D. Coordination with Other Jurisdictions

1. Discharges Within Permittees' Boundaries

There are areas within the geographical boundaries of the Permittees over which the Permittees are preempted to regulate. Such areas include federal lands and state properties, including, but not limited to, military bases, state parks, government hospitals, colleges and universities, and highways. The Permittees are not responsible for such facilities and/or discharges originating from these areas. The Regional Board may either designate these facilities as Permittees under this permit or issue separate NPDES permits to these facilities.

The California Department of Transportation (Caltrans) discharges storm water and non-storm water from highways, freeways, streets, interceptors, maintenance yards, and other holdings it owns and/or operates. Caltrans, currently a Co-Permittee to Order No. 90-079, submitted an ROWD on July 13, 1995, for separate waste discharge requirements for its discharges in the County of Los Angeles and the County of Ventura. The waste discharge requirements to be issued to Caltrans will be consistent with this Order.

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2. Discharges Outside Permittees' Boundaries

There are areas outside the geographical boundaries of the Permittees that drains into receiving water bodies in the permitted area. These areas include the following:

- a. About 34 square miles of unincorporated areas in Ventura County drain into Malibu Creek, thence to Santa Monica Bay. The County of Ventura is a Permittee to Order No. 90-079. With the issuance of a permit for discharges of storm water from the MS4 in the County of Ventura (Order No. 94-082, NPDES No. CAS063339), the County of Ventura has requested (letter dated April 6, 1996) that this area be covered under the Ventura Permit. The request stated that the County of Ventura when implementing its storm water programs will, to the maximum extent practicable, achieve consistency with the permit for Los Angeles County for the area in question.
- b. About nine square miles of the City of Thousand Oaks also drain into Malibu Creek, thence to Santa Monica Bay. The City Thousand Oaks initially opted to apply for an individual permit for the area that drains into Malibu Creek, instead of becoming a Permittee to Order No. 90-079. With the issuance of waste discharge requirements for discharges of storm water and urban runoff for the County of Ventura, the City of Thousand Oaks elected to be a Permittee to the Ventura permit including the areas which drains into Malibu Creek. The City of Thousand Oaks will ensure that its storm water management program for the portion that drains into Los Angeles County is consistent with requirements of the permit for Los Angeles County.
- c. About 86 square miles of areas in Orange County drain into Coyote Creek, thence into the San Gabriel River. This Regional Board will coordinate with the Santa Ana Regional Board so that storm water management programs for the areas in Orange County that drains into Coyote Creek are consistent with the requirements of the permit.

3. Permittees Discharging into Santa Clara River

The City of Santa Clarita and some unincorporated areas of Los Angeles County drain into the Santa Clara River Watershed. The lower portion of

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the watershed is located in Ventura County and is regulated under the Ventura County permit. Successful management of the entire watershed needs coordination among the City of Santa Clarita, the County of Los Angeles, and Ventura County in developing and implementing the storm water management plan for the watershed.

**IV. BENEFICIAL USES AND CONDITION OF RECEIVING WATERS**

The major receiving water bodies in the permitted area are:

- Santa Monica Bay
- Malibu Creek
- Ballona Creek
- Los Angeles River/Long Beach Harbor
- San Gabriel River/Long Beach Harbor
- Dominguez Channel/Los Angeles Harbor
- San Pedro Bay
- Santa Clara River

**A. Basin Plan**

The Regional Board adopted an updated Water Quality Control Plan (Basin Plan) for the Los Angeles Region on June 13, 1994. The Basin Plan specifies the beneficial uses of receiving waters and contains both narrative and numerical water quality objectives for the receiving waters in the County of Los Angeles.

The beneficial uses of water bodies in the County of Los Angeles include: municipal and domestic supply, agricultural supply, industrial service supply, industrial process supply, ground water recharge, freshwater replenishment, navigation, hydropower generation, water contact recreation, non-contact water recreation, ocean commercial and sport fishing, warm freshwater habitat, cold freshwater habitat, preservation of Areas of Special Biological Significance, saline water habitat, wildlife habitat, preservation of rare and endangered species, marine habitat, fish migration, fish spawning, and shellfish harvesting.

**B. Condition of the Receiving Waters**

Periodic Water Quality Assessments (latest report dated April 18, 1996) conducted by the Regional Board identified impairment of a number of water bodies in Los Angeles County. The beneficial uses of these water bodies are either impaired or threatened to be impaired. Pollutants found causing impairment include: heavy metals, coliform, enteric viruses, pesticides, nutrients, polycyclic aromatic

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hydrocarbons, polychlorinated biphenyls, organic solvents, sediments, trash, debris, algae, scum, and odor.

An epidemiological study (*An Epidemiological Study of Possible Adverse Health Effects of Swimming in Santa Monica Bay*, Santa Monica Bay Restoration Project (SMBRP), May 1996) conducted during the summer of 1995 for the SMBRP demonstrated that there is an increased risk of acute illnesses caused by swimming near flowing storm drain outlets in Santa Monica Bay.

Previous investigations conducted for the SMBRP (*An Assessment of Inputs of Fecal Indicator Organisms and Human Enteric Viruses from Two Santa Monica Storm Drains*, SMBRP, 1990; *Storm Drains as a Source of Surf Zones Bacterial Indicators and Human Enteric Viruses to Santa Monica Bay*, SMBRP, 1991; *Pathogens and Indicators in Storm Drains within the Santa Monica Bay Watershed*, SMBRP, 1992) showed pathogens were detected in summer runoff at four storm drain locations. Likely sources of pathogen contamination include illicit sewer connections to the storm drains, leaking sewer lines, malfunctioning septic systems, improper waste disposal by recreational vehicles, campers or transients. Additional potential sources of human pathogens in nearshore waters include sewage overflows into storm drains, small boats waste discharges, and bathers themselves.

Although the foregoing studies were done on the Santa Monica Bay, the results could be extrapolated to other water bodies in Los Angeles.

The Regional Board therefore considers storm water/urban runoff discharges to be significant sources of pollutants that may be causing, threatening to cause, or contributing to the impairment of the water quality and beneficial uses of the receiving water bodies in Los Angeles County, and as such need to be regulated.

**VI. PERMIT REQUIREMENTS**

**A. Authorized Discharges and Discharge Prohibitions**

This permit authorizes discharges from municipal separate storm sewers by the Permittees to the water of the State.

Since municipal separate storm sewers carry storm water and other flows, this permit authorizes the discharge of storm water commingled with other urban runoff specified in this permit. Industrial process wastewater and non-process wastewater are non-storm water discharges and cannot be authorized under this permit because of the requirement in Section 402(p)(3)(B)(ii) of the federal Clean

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Water Act that municipal permits are to prohibit non-storm water discharges to the MS4. However, such discharges to MS4 can be authorized if they receive an NPDES permit other than this stormwater permits. All other non-stormwater discharges are addressed in the Storm Water Management Program (SWMP) to detect and eliminate illicit discharges and improper disposal as required under Part 2.II. of this permit.

The discharge of storm water associated with industrial activity through MS4 is authorized by this permit, provided they obtained coverage under the State Board's general NPDES permit. For further explanation of the reasons for the separate permit requirements, see the preamble to the amendments to 40 CFR parts 122, 123, and 124 published in the Federal register, Friday, November 16, 1990.

**B. Receiving Water Limitations**

The fundamental objective of the CWA is to protect, maintain, or restore existing or potential beneficial uses of receiving waters as evaluated in 1972. Narrative and numerical criteria were developed to achieve this goal, are considered necessary by the USEPA to meet the statutory requirements of the CWA Section 303(c)(2)(A), and are to be applied to all NPDES permits including those for storm water discharges.

Also, California Water Code (CWC) Section 13263(a) requires that waste discharge requirements issued by Regional Boards shall implement any relevant water quality control plans that have been adopted, shall take into consideration the beneficial uses to be protected, the water quality objectives reasonably required for that purpose, other waste discharges, and the need to prevent nuisance.

The intent of this Order is to attain and protect the beneficial uses of receiving waters in the County of Los Angeles. This Order, therefore, includes narrative Receiving Water Limitations that require storm water discharges neither cause violations of water quality objectives, cause a condition of nuisance, nor cause water quality impairment in the receiving waters.

To meet the receiving water limitations, this Order requires the implementation of BMPs to reduce pollutants in storm water to the maximum extent practicable with a monitoring program to assess compliance.

The Regional Board finds that the unique aspects of the regulation of the storm water discharges through municipal storm sewer systems, including intermittent discharges, difficulties in monitoring and limited physical control over the

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discharge, will require adequate time to implement and evaluate the effectiveness of best management practices and to determine whether they will adequately protect the receiving water. Therefore, this Order includes a procedure for determining whether storm water discharges are causing continuing and recurring exceedances of receiving water limitations and for evaluating whether the storm water management program must be revised. The Permittees will be in compliance with the Receiving Water Limitations so long as they comply with that procedure.

C. Storm Water Management Program Requirements

As a functional equivalent of meeting the receiving water limitations, the permittees are required to implement a comprehensive pollution prevention and management programs. As required by CWA Section 402(p)(3)(B), the SWMP must include controls necessary to reduce the discharge of pollutants from the MS4 to the Maximum Extent Practicable (MEP). Controls required under the SWMP consist of a combination of best management practices, control techniques, system design and engineering methods. The various components of the SWMP, taken as a whole (rather than individually), are expected to be sufficient to meet this standard and attain the objectives of the Basin Plan. The Permittees may be required to update the SWMP periodically to ensure conformance with the statutory requirements of CWA Section 402(p)(3)(B).

Specifically, the Permittees are required to develop and implement programs in the following areas which were based on the requirements of 40 CFR Part 122.26:

1. Illicit connections and illicit discharges
2. Development planning and construction;
3. Public agency activities;
4. Public information and participation; and

The objectives of the foregoing program components required are discussed in the enclosed "Response to Comments".

The requirements of Section 6217(g) of the Coastal Zone Act Reauthorization Amendments of 1990 (CZARA) were also considered in this permit. CZARA requires coastal states with approved coastal zone management programs to address nonpoint pollution impacting or threatening coastal water quality. Pursuant to CZARA, USEPA issued *Guidance Specifying Management Measures For Sources of Nonpoint Pollution In Coastal Waters*, 1993 (EPA-840-B-92-002). The guidance focuses on five major categories of nonpoint sources that impair or

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Factsheet for Los Angeles County  
Municipal Storm Water Permit  
Order No. 96-xxx

(NPDES NO. CAS614001)

threaten coastal waters nationally: (a) agricultural runoff; (b) silvicultural runoff; (c) urban runoff (including developing and developed areas); (d) marinas and recreational boating; and (e) hydromodification. This permit includes management measures for pollution from urban runoff and marinas, thus, it provides the functional equivalence for compliance with CZARA in these two areas.

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State of California  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

ORDER NO. 98-XXX  
(NPDES NO. CAS614001)

WASTE DISCHARGE REQUIREMENTS  
FOR  
MUNICIPAL STORM WATER AND URBAN RUNOFF DISCHARGES  
WITHIN THE COUNTY OF LOS ANGELES

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**WASTE DISCHARGE REQUIREMENTS  
FOR  
MUNICIPAL STORM WATER AND URBAN RUNOFF DISCHARGES  
WITHIN THE COUNTY OF LOS ANGELES**

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

ORDER NO. 96-XXX  
(NPDES NO. CAS614001)

WASTE DISCHARGE REQUIREMENTS  
FOR  
MUNICIPAL STORM WATER AND URBAN RUNOFF DISCHARGES  
WITHIN THE COUNTY OF LOS ANGELES

The California Regional Water Quality Control Board, Los Angeles Region (hereinafter referred to as the Regional Board), finds:

Existing Permit and Report of Waste Discharge

1. The County of Los Angeles and 85 incorporated cities within the County of Los Angeles (see Attachment A, List of Permittees), hereinafter referred to as Permittees, discharge or contribute to discharges of storm water and urban runoff from municipal separate storm sewer systems (MS4s), also called storm drain systems, and water courses within the County of Los Angeles into receiving waters of the Los Angeles Basin under countywide waste discharge requirements contained in Order No. 90-079 adopted by this Regional Board on June 18, 1990. That Order also serves as a National Pollutant Discharge Elimination System (NPDES) permit (CA0061654).
2. On December 21, 1994, the Permittees submitted a Report of Waste Discharge (ROWD) as an application for re-issuance of waste discharge requirements and a NPDES permit.

Nature of Discharges and Sources of Pollutants

3. The discharges consist of surface runoff (non-storm water and storm water) from various land uses in all the hydrologic drainage basins that discharge into water bodies in Los Angeles County. The quality and quantity of these discharges vary considerably and are affected by the hydrology, geology, and land use characteristics of the watersheds; seasonal weather patterns; and frequency and duration of storm events.
4. Studies have shown that storm water runoff from urban and industrial areas typically contains the same general types of pollutants that are often found in wastewater in industrial discharges. Pollutants commonly found in storm water runoff include heavy metals, pesticides, herbicides, and synthetic organic compounds such as fuels, waste oils, solvents, lubricants, and grease. These compounds can have damaging effects on both human health and aquatic ecosystems. In addition to pollutants, the high volumes of storm water discharged from MS4s in areas of rapid urbanization have had significant impacts on aquatic ecosystems due to physical modifications such as bank erosion and widening of

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channels. [Source: *Guidance Manual for the Preparation of Part 2 of the NPDES Permit Applications for Discharges from Municipal Separate Storm Sewer Systems*, United States Environmental Protection Agency (USEPA) # 833-B-92-002, 1992].

5. Periodic Water Quality Assessments (latest report dated April 18, 1996) conducted by the Regional Board identified impairment of a number of water bodies in Los Angeles County. The beneficial uses of these water bodies are either impaired or threatened to be impaired. Pollutants found causing impairment include: heavy metals, coliform, enteric viruses, pesticides, nutrients, polycyclic aromatic hydrocarbons, polychlorinated biphenyls, organic solvents, sediments, trash, debris, algae, scum, and odor.
6. An epidemiological study [*An Epidemiological Study of Possible Adverse Health Effects of Swimming in Santa Monica Bay*, Santa Monica Bay Restoration Project (SMBRP), May 1996] conducted during the summer of 1995 for the SMBRP demonstrated that there is an increased risk of acute illnesses caused by swimming near flowing storm drain outlets in Santa Monica Bay.

Previous investigations conducted for the SMBRP (*An Assessment of Inputs of Fecal Indicator Organisms and Human Enteric Viruses from Two Santa Monica Storm Drains*, SMBRP, 1990; *Storm Drains as a Source of Surf Zones Bacterial Indicators and Human Enteric Viruses to Santa Monica Bay*, SMBRP, 1991; *Pathogens and Indicators in Storm Drains within the Santa Monica Bay Watershed*, SMBRP, 1992) showed pathogens were detected in summer runoff at four storm drain locations. Likely sources of pathogen contamination include illicit sewer connections to the storm drains, leaking sewer lines, malfunctioning septic systems, improper waste disposal by recreational vehicles, campers or transients. Additional potential sources of human pathogens in nearshore waters include sewage overflows into storm drains, small boats waste discharges, and bathers themselves.

Although the foregoing studies were done on the Santa Monica Bay, the results can be extrapolated to other water bodies in Los Angeles.

7. The Regional Board therefore considers storm water/urban runoff discharges to be significant sources of pollutants that are causing, threatening to cause, or contributing to the impairment of the water quality and beneficial uses of the receiving water bodies in Los Angeles County, and as such need to be regulated.

**Coverage and Exemptions**

8. The requirements in this Order cover all areas within the boundaries of the cities as well as unincorporated areas in Los Angeles County within the jurisdiction of the Los Angeles Regional Board except the City of Avalon. The Permittees serve a population of about 11.4 million (1990 *Census of Population and Housing*, Bureau of the Census, U.S. Department of Commerce) in an area of approximately 3,100 square miles. Attachment B shows the map of the permitted area in Los Angeles County.

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- 9. Federal, state, or regional entities within the Permittees' boundaries or in jurisdictions outside the County of Los Angeles, and not currently named in this Order, may operate storm drain facilities and/or discharge storm water to the storm drains and watercourses covered by this Order. The Permittees may lack legal jurisdiction over these entities under state and federal constitutions. Consequently, the Regional Board recognizes that the Permittees will not be held responsible for such facilities and/or discharges.

For those entities within the Permittees' boundaries, the Regional Board may consider to designate them as Permittees under this Order or issue separate NPDES permits consistent with this Order. The California Department of Transportation (Caltrans), currently a Co-Permittee to Order No. 90-079, submitted an ROWD on July 3, 1995, for separate waste discharge requirements for its discharges in the County of Los Angeles and the County of Ventura. The waste discharge requirements to be issued to Caltrans will be consistent with this Order.

- 10. Sources of discharges into receiving waters in the County of Los Angeles but in jurisdictions outside its boundary include the following:
  - a. About 34 square miles of unincorporated areas in Ventura County drain into Malibu Creek, thence to Santa Monica Bay,
  - b. About 9 square miles of the City of Thousand Oaks also drain into Malibu Creek, thence to Santa Monica Bay, and
  - c. About 86 square miles of areas in Orange County drain into Coyote Creek, thence into the San Gabriel River Watershed in the County of Los Angeles.

The Regional Board will insure that storm water management programs for the areas in Ventura County and the City of Thousand Oaks that drain into Santa Monica Bay are consistent with the requirements of this Order. The Regional Board will coordinate with the Santa Ana Regional Board so that storm water management programs for the areas in Orange County that drains into Coyote Creek are consistent with the requirements of this Order.

- 11. The City of Santa Clarita and some unincorporated areas of Los Angeles County drain into the Santa Clara River Watershed, the portion of which that is located in Ventura County is regulated under the municipal storm water NPDES permit for the County of Ventura (Order No. 94-082, CAS063339). Successful management of the entire watershed needs coordination among the City of Santa Clarita, the County of Los Angeles, and Ventura County in developing and implementing the storm water management plan for the watershed.

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Bases of Waste Discharge Requirements

Federal Statutes and Regulations

- 12. Section 402(p) of the federal Clean Water Act (CWA), as amended by the Water Quality Act of 1987, requires NPDES permits for storm water discharges from MS4s to waters of the United States. Section 402(p)(3)(B) requires that permits for MS4s: ..... "(i) may be issued on a system- or jurisdiction-wide basis; (ii) shall include a requirement to effectively prohibit non-storm water discharges into the storm sewers; and (iii) shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques and system, design and engineering methods, and such other provisions as the Administrator or the State determines appropriate for the control of such pollutants."
- 13. On November 16, 1990, pursuant to Section 402(p) of the CWA, the USEPA promulgated 40 Code of Federal Regulations (CFR) Part 122.26 which established requirements for storm water discharges under the NPDES program. The regulations recognize that certain categories of non-storm water discharges may not be prohibited if they have been determined to be not significant sources of pollutants.
- 14. Section 6217(g) of the Coastal Zone Act Reauthorization Amendments of 1990 (CZARA) requires coastal states with approved coastal zone management programs to address non-point pollution impacting or threatening coastal water quality. As required by CZARA, USEPA issued *Guidance Specifying Management Measures For Sources of Non-point Pollution In Coastal Waters*, 1993 (EPA-840-B-92-002). The guidance focuses on five major categories of non-point sources that impair or threaten coastal waters nationally: (a) agricultural runoff; (b) silvicultural runoff; (c) urban runoff (including developing and developed areas); (d) marinas and recreational boating; and (e) hydromodification. This Order includes management measures for pollution from urban runoff and marinas, thus, it provides the functional equivalence for compliance with CZARA in these two areas.

State Statutes and Permits

- 15. To facilitate compliance with federal regulations, in 1992 the State Water Resources Control Board (State Board) issued two statewide general NPDES permits: one for storm water from industrial sites [NPDES No. CAS000001, General Industrial Activities Storm Water Permit (GIASP)] and the other for storm water from construction sites [NPDES No. CAS000002, General Construction Activity Storm Water Permit (GCASP)]. "Industrial Activities", as defined in 40 CFR § 122.26(b)(14)(i) through (xi), and construction activities with a disturbed area of five acres or more are required to obtain individual NPDES permits for storm water discharges, or be covered by these statewide general permits by completing and filing a Notice of Intent with the State Board.

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- 16. The State Board adopted a dual annual fee structure for industrial facilities and construction sites covered by the two general permits described in Finding 15. Industrial facilities and construction sites located in jurisdictions with a MS4 permit are subject to a lower annual fee (\$250) than those located in jurisdictions without a MS4 permit (\$500). The intent of the dual fee structure was to allow Permittees to recover the annual fee differential or portion thereof if necessary to support the MS4 program and also provide some oversight over these facilities.
- 17. The State of California is a delegated state under the NPDES program and, as such, pursuant to Section 510 of the CWA and 40 CFR Part 123.25, may impose more stringent requirements necessary to implement water quality control plans for the protection of beneficial uses of receiving waters and/or to prevent nuisance.
- 18. California Water Code (CWC) Section 13263(a) requires that waste discharge requirements issued by Regional Boards shall implement any relevant water quality control plans that have been adopted, shall take into consideration the beneficial uses to be protected, the water quality objectives reasonably required for that purpose, other waste discharges, and the need to prevent nuisance.

Regional Board Water Quality Control Plans and Policies

- 19. The Regional Board adopted an updated Water Quality Control Plan (Basin Plan) for the Los Angeles Region on June 13, 1994. The Basin Plan specifies the beneficial uses of receiving waters and contains both narrative and numerical water quality objectives for the receiving waters in the County of Los Angeles.

The beneficial uses of water bodies in the County of Los Angeles include: municipal and domestic supply, agricultural supply, industrial service supply, industrial process supply, ground water recharge, freshwater replenishment, navigation, hydropower generation, water contact recreation, non-contact water recreation, ocean commercial and sport fishing, warm freshwater habitat, cold freshwater habitat, preservation of Areas of Special Biological Significance, saline water habitat, wildlife habitat, preservation of rare and endangered species, marine habitat, fish migration, fish spawning, and shellfish harvesting.

- 20. This Regional Board has implemented a Watershed Management Approach to address water quality protection in the region. The objective of the Watershed Management Approach is to provide a comprehensive and integrated strategy towards water resource protection, enhancement, and restoration while balancing economic and environmental impacts within a hydrologically defined drainage basin or watershed. It emphasizes cooperative relationships between regulatory agencies, the regulated community, environmental groups, and other stakeholders in the watershed to achieve the greatest environmental improvements with the resources available.
- 21. To implement the Watershed Management Approach, as well as facilitate compliance with

this Order, the County of Los Angeles is divided into six Watershed Management Areas (WMAs) as follows:

- a. Malibu Creek and Rural Santa Monica Bay WMA
- b. Ballona Creek and Urban Santa Monica Bay WMA
- c. Los Angeles River WMA
- d. San Gabriel River WMA
- e. Dominguez Channel/Los Angeles Harbor WMA
- f. Santa Clara River WMA

Attachment A, shows the list of Permittees under each Watershed Management Area.

Other Bases

- 22. The SMBRP developed a Bay Restoration Plan to serve as a blueprint for Santa Monica Bay's recovery. The Plan recommends actions that the Regional Board should integrate into the storm water permit and provides guidance to the Regional Board for the development of a strong, environmentally-sound storm water program.
  - 23. The Regional Board is the enforcing authority for the two statewide general permits, described in Finding 15, which regulates discharges from industrial facilities and construction sites, and all NPDES storm water and non-storm water permits issued by the Regional Board. However, frequently industrial and construction sites discharge directly into storm drains and/or flood control facilities owned and operated by the Permittees or located in the jurisdiction of the Permittees. These industrial and construction sites are also regulated under local laws and regulations. Therefore, a coordinated effort between the Permittees and the Regional Board is critical to avoid duplicative regulatory activities and promote program efficiency.
  - 24. The ROWD submitted by the Permittees includes:
    - a. Summary of Best Management Practices (BMP) implemented;
    - b. Storm water management plans for the six WMAs;
    - c. Countywide evaluation of existing storm water quality data; and
    - d. Monitoring Program.
- The ROWD served as partial basis for the development of the Storm Water Management Program (SWMP) requirements of this Order.
- 25. A USEPA review of activities conducted by the automotive service sector indicates that automotive service facilities present a significant potential for the discharge of pollutants in storm water. A compliance review of municipal pretreatment and results to date of storm water inspection programs in California confirm the USEPA findings.

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26. Studies demonstrate that parking lots and gasoline stations are significant sources of pollutants in storm water (*Urban Storm Water Toxic Pollution, Assessment, Sources*, Pitt et.al. V. 67; *Results of Retail Gas Outlet & Commercial Parking Lot Storm Water Runoff Study*, Western States Petroleum Association and American Institute, 1994; *Guidance Specifying Management Measures for Sources of Non-point Pollution in Coastal Waters*, USEPA, # 840-B-92-002, 1993).
27. A compliance review of restaurants and similar food handling facilities by municipal pretreatment and storm water inspection programs in Los Angeles County and the experience of other California MS4s programs indicate that food waste, oil and grease, chemicals, and wash waters are sometimes discharged into the storm drain system.

Objectives and Requirements of this Order

28. The intent of this Order is to attain and protect the beneficial uses of receiving waters in the County of Los Angeles. This Order, therefore, includes narrative Receiving Water Limitations that require storm water discharges neither cause violations of water quality objectives, cause a condition of nuisance, nor cause water quality impairment in the receiving waters.  
  
To meet the Receiving Water Limitations, this Order requires the implementation of BMPs to reduce pollutants in storm water to the maximum extent practicable with a monitoring program to assess compliance.
29. The Regional Board finds that the unique aspects of the regulation of the storm water discharges through municipal storm sewer systems, including intermittent discharges, difficulties in monitoring and limited physical control over the discharge, will require adequate time to implement and evaluate the effectiveness of best management practices and to determine whether they will adequately protect the receiving water. Therefore, this Order includes a procedure for determining whether storm water discharges are causing continuing and recurring exceedances of receiving water limitations and for evaluating whether the storm water management program must be revised. The Permittees will be in compliance with the Receiving Water Limitations so long as they comply with that procedure.
30. This Order designates the County of Los Angeles as the Principal Permittee. The Principal Permittee will coordinate and facilitate activities necessary to comply with the requirements of this Order, but is not responsible for insuring compliance of any individual permittee.
31. Each Permittee is responsible for the implementation of the appropriate storm water management program developed pursuant to the requirements of this Order, and not for the implementation of the provisions applicable to the Principal Permittee or other Permittees. Each Permittee need only to comply with the requirements of this Order applicable to discharges originating from within its boundaries and over which it is required

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to have regulatory control.

32. In the ROWD, the Permittees proposed the formation of a countywide Executive Advisory Committee (EAC), and a Watershed Management Committee (WMC) for each of the WMAs. The EAC and the six WMCs are now functional.

The EAC's main role is to facilitate programs within each watershed and to enhance consistency among all of the programs. Similar to the Principal Permittee, the EAC are not responsible for insuring compliance of any individual permittee with the requirements of this Order.

The WMCs, as required in this Order, will provide the leadership framework to facilitate development of the Watershed Management Area Plans and foster cooperation among Permittees.

33. The USEPA issued a guidance manual for submittal of a Part II application for MS4s (*Guidance Manual for the Preparation of Part of the NPDES Applications for Discharges from Municipal Separate Storm Sewer Systems*, USEPA # 833-B-92-002, 1992). The manual provides the components of a municipal storm water program that will meet the requirements of 40 CFR Part 122.26.
34. The SWMP required in this Order builds upon the foundation established in Order No. 90-079, consists of the components recommended in the USEPA guidance manual, and was developed with the cooperation of representatives from the regulated community and environmental groups. The SWMP includes requirements with compliance dates to provide specificity and certainty of expectations. It also includes provisions that promote customized initiatives, both on a countywide and watershed basis, in developing and implementing cost-effective measures to minimize discharge of pollutants to the receiving water. The various components of the SWMP, taken as a whole rather than individually, are expected to reduce pollutants in storm water and urban runoff to the maximum extent practicable.
35. The main focus of the SWMP is pollution prevention through education, public outreach, planning, and implementation of BMPs. Successful implementation of the provisions of the SWMP will require cooperation and coordination of all public agencies in each Permittees' organization, among Permittees, and the regulated community. To minimize cost, the Permittees are encouraged to utilize their existing organizational framework to implement the various activities required in this Order.
36. As required in Order No. 90-079 and pursuant to 40 CFR Part 122.26(d)(2)(i), this Order requires Permittees to demonstrate that they possess the legal authority to implement and enforce the storm water programs within their respective jurisdiction. This legal authority may be in the form of ordinances, permits, contracts or similar means. If Permittees decide that the legal authority would be through ordinances, Permittees are encouraged to develop a model ordinance for them to adopt to minimize cost and promote countywide consistency.

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37. Order 90-079 required the development and implementation of BMPs to minimize pollutants in storm water. In 1993, the Regional Board approved 13 baseline BMPs to facilitate the implementation of countywide minimum requirements, to encourage countywide consistency, and provide a minimum measure of progress. These BMPs were selected from Permittees' MS4 programs. Twelve of these 13 BMPs have been incorporated into this Order: a) Catch basin labeling; b) Public illicit discharges reporting; c) Construction storm water ordinance; d) Public education and outreach; e) Catch basin cleanout; f) Roadside trash receptacles; g) Street sweeping; h) Proper disposal of litter, lawn clippings, pet feces; i) Removal of dirt, rubbish and debris at homes and businesses; j) Oil, glass, and plastics recycling; k) Proper disposal of household hazardous wastes; and l) Proper water use and conservation. The thirteenth BMP (inspections of vehicle repair shops, vehicle body shops, vehicle parts and accessories, gasoline stations, and restaurants) has been changed to educational site visits.
38. Each Permittee owns/operates facilities and/or enters into contracts with outside parties to carry out activities within its jurisdiction that may impact storm water quality. Each Permittee, under this Order is required to implement BMPs to reduce pollutant discharges from these activities/facilities.
39. This Order provides the flexibility for the Permittees to petition the Regional Board Executive Officer to substitute a BMP or requirement under the SWMP with an alternative BMP, if they can provide information and documentation on the effectiveness of the alternative, equal to or greater than the prescribed BMP in meeting the objectives of this Order.

Enforcement Actions under the Existing Order (90-079)

40. Pursuant to CWA Section 505, the Natural Resources Defense Council (NRDC) filed a lawsuit with the Federal District Court, Central District of California, against Caltrans and some other Permittees for noncompliance with the requirements of Order No. 90-079. The court ruled in NRDC vs. Caltrans (C.D. Cal. 1994) that the Director of Caltrans has not substantially complied with Order No. 90-079. In the ruling, the Court stated that in order to reduce pollutants to the maximum extent practicable, a Permittee must evaluate and implement all applicable BMPs, except where: a) other effective BMPs will achieve greater or substantially similar pollution control benefits; b) the BMP is not technically feasible; or c) the cost of BMP implementation greatly outweighs the pollution control benefits.

In the lawsuits against the other Permittees, negotiated settlements were reached and entered in court which require the defendants to implement storm water pollution control measures or conduct storm water monitoring.

Others

41. The Regional Board will provide the Principal Permittee with an updated list of NPDES permits on a quarterly basis through the Regional Board's electronic bulletin board which may be accessed at (213) 266-7663, or other available methods, for use by each Permittee

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to identify permitted sources of active non-storm water discharges into the MS4.

- 42. This action to adopt and issue waste discharge requirements and a NPDES permit is exempt from the provisions of the California Environmental Quality Act; Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code in accordance with Section 13389 of the California Water Code.

Public Process

- 43. The Regional Board will notify interested agencies and interested persons of the availability of reports, plans, and/or schedules of implementation submitted pursuant to the requirements of this Order. The Regional Board will consider comments prior to taking any action on the submitted documents as provided for in this Order.
- 44. This Order may be modified or alternatively revoked or reissued prior to its expiration date, in accordance with the procedural requirements of the federal NPDES program, and the California Water Code and Title 23 of the California Code of Regulations for the issuance of waste discharge requirements.
- 45. The Regional Board staff solicited comments on early drafts of this Order from Permittees, interested agencies, and interested persons. In addition, Regional Board staff met with representatives from Permittees, business associations, environmental groups, and other interested persons to discuss permit requirements and resolve critical issues. Regional Board staff also solicited feedback from the SMBRP Oversight Committee on early drafts of the Order, and attended Permittee watershed meetings, made presentations to government officials, and conducted and/or participated in public workshops to hear concerns.

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The Regional Board has notified Permittees, interested agencies, and interested persons of its intent to prescribe waste discharge requirements and an MS4 NPDES permit for storm water discharges and has provided them with an opportunity for a public hearing and an opportunity to submit their written views and recommendations.

The Board, in a public hearing, heard and considered all comments pertaining to the tentative waste discharge requirements. This order shall serve as a National Pollutant Discharge Elimination System (NPDES) Permit pursuant to Section 402 of the federal Clean Water Act, or amendments thereto, and shall take effect at the end of 15 days from the date of its adoption, provided the Regional Administrator of the U.S. Environmental Protection Agency, Region IX, has no objections.

IT IS HEREBY ORDERED that the County of Los Angeles and the Cities of Agoura Hills, Alhambra, Arcadia, Artesia, Azusa, Baldwin Park, Bell, Bellflower, Bell Gardens, Beverly Hills, Bradbury, Burbank, Calabasas, Carson, Cerritos, Claremont, Commerce, Compton, Covina,

Cudahy, Culver City, Diamond Bar, Downey, Duarte, El Monte, El Segundo, Gardena, Glendale, Glendora, Hawaiian Gardens, Hawthorne, Hermosa Beach, Hidden Hills, Huntington Park, Industry, Inglewood, Inwindale, La Cañada Flintridge, La Habra Heights, Lakewood, La Mirada, La Puente, La Verne, Lawndale, Lomita, Long Beach, Los Angeles, Lynwood, Malibu, Manhattan Beach, Maywood, Monrovia, Montebello, Monterey Park, Norwalk, Palos Verdes Estates, Paramount, Pasadena, Pico Rivera, Pomona, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, Rosemead, San Dimas, San Fernando, San Gabriel, San Marino, Santa Clarita, Santa Fe Springs, Santa Monica, Sierra Madre, Signal Hill, South El Monte, South Gate, South Pasadena, Temple City, Torrance, Vernon, Walnut, West Covina, West Hollywood, Westlake Village, and Whittier, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, and the provisions of the Clean Water Act, as amended, and regulations and guidelines adopted thereunder, shall comply with the following for the areas within their boundaries and subject to their regulatory jurisdiction, in the County of Los Angeles.

**Part 1. DISCHARGE PROHIBITIONS AND RECEIVING WATER LIMITATIONS**

**I. Discharge Prohibition**

Each Permittee shall, within its jurisdiction, effectively prohibit non-storm water discharges into the municipal separate storm sewer system (MS4) and watercourses, except where such discharges are:

- A. In compliance with a separate individual or general NPDES permit; or
- B. Identified and in compliance with Part 3, Item II.C (Illicit Connections/Discharges: Non-storm Water Discharges), of this Order; or
- C. Discharges originating from federal, state or other facilities which the Permittee is preempted from regulating.

Compliance with this Order through timely development and implementation of programs described herein shall constitute compliance with this prohibition.

**II. Receiving Water Limitations**

The receiving water limitations are based on the water quality objectives and water quality standards applicable to receiving waters in Los Angeles County contained in the Basin Plan (*Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water*

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Quality Control Board, Los Angeles Region, Monterey Park, 1994) and amendments thereto. A Permittee will not be in violation of the Receiving Water Limitations so long as they are in compliance with the Storm Water Management Program Requirements set forth in this Order, and the provisions in Part 1.II.B.

A. The discharge of storm water or non-storm water from a municipal separate storm sewer system (MS4) for which the Permittee is responsible under the terms of this Order shall not cause the following conditions to continue or recur in receiving waters:

1. Presence of total and fecal coliforms at levels that adversely affect beneficial uses;
2. Presence of oil, grease, wax or other materials at levels that form a visible film or coating on the water surface, on objects in the water, or at the ocean/stream bottom that create nuisance or adversely affect beneficial uses;
3. Presence of floating materials or suspended materials (including solids, liquids, foams, and scum) that create nuisance or adversely affect beneficial uses;
4. Deposition of materials that cause nuisance or adversely affect beneficial uses;
5. Presence of undesirable coloration or discoloration that creates nuisance or adversely affect beneficial uses;
6. Promote objectionable aquatic growth such as algae and slime to the extent that cause nuisance or adversely affect beneficial uses;
7. Toxic substances to be present in concentrations that are toxic to, or that produce detrimental physiological responses in human, plant, animal, or aquatic life;
8. Presence of taste or odor-producing substances at levels that impart undesirable tastes or odor to fish flesh or other edible aquatic resources, cause nuisance, or adversely affect beneficial uses; and,
9. Changes in temperature and turbidity to the extent that result in nuisance or adverse effect on beneficial uses.

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- B. If the Executive Officer determines that a continuing or recurring exceedance of the receiving water limitations has been caused by discharges authorized under this Order, the following steps shall be taken:
1. The Executive Officer will evaluate the adequacy of the Permittees' implementation of the Storm Water Management Program (SWMP) required in this Order based on the Permittees' submitted reports and other relevant information. The Executive Officer will determine if implementation of the SWMP has a reasonable likelihood of preventing future exceedances of receiving water limitations. If the Executive Officer makes this determination, the Permittees shall continue implementing the approved program.
  2. If the Executive Officer determines that implementation of the SWMP will not have a reasonable likelihood of preventing future exceedances of receiving water limitations, the Permittees shall, upon notice from the Executive Officer, do the following:
    - a. The Executive Officer may require the Permittees to submit a report that includes an evaluation of the relative contribution of the storm water discharges to the exceedance of the receiving water limitation. The report shall address the persistence and the causes of the exceedance, and the technical and economic feasibility of control actions by the Permittees to reduce or eliminate the exceedance;
    - b. The Executive Officer may require the Permittees to submit a report reviewing the SWMP to determine whether it should be revised so that there will be a reasonable likelihood of preventing future exceedances of receiving water limitations, or whether revisions to achieve compliance with receiving water limitations are technically or economically feasible. If the report recommends revision of the SWMP, the report shall include a work plan to revise the plan so that it will have a reasonable likelihood of preventing future exceedances of receiving water limitations. If the report concludes that no revisions are necessary to achieve compliance with receiving water limitations, the report shall explain how implementation of the SWMP will achieve compliance. If the report determines that revisions to achieve compliance with receiving water limitations are technically or economically infeasible, the Permittees shall continue to comply with the SWMP, shall fully document this determination, and shall make recommendations for actions to achieve compliance, including, for example, commencement of a total maximum daily load report or revision of the Basin Plan or mitigation projects to protect beneficial uses, and identification of funding sources for such actions; and,

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- c. The Permittees shall implement the work plan and revised SWMP as approved by the Executive Officer.
3. The Executive Officer shall review and approve or disapprove the reports required under Receiving Water Limitation II.B. The reports may be submitted as part of the next Annual Report, or at some other time designated by the Executive Officer. Provided the Permittee has complied with the procedures set forth in Receiving Water Limitation II.B. the Permittee does not have to repeat the procedures for continuing exceedances of the same water quality objective. As appropriate, any determination under II.B. or revisions to the Permittee's program may be considered by the Regional Board in a public hearing.

**Part 2. STORM WATER MANAGEMENT PROGRAM REQUIREMENTS**

The objective of the Storm Water Management Program requirements prescribed in this Order is to reduce pollutants in discharges to the maximum extent practicable in order to attain the water quality objective and protect the beneficial uses of receiving waters in Los Angeles County. Each Permittee shall implement within its jurisdiction the Storm Water Management Program requirements of this Order and those of the Countywide Storm Water Management Plan (CSWMP) or Watershed Management Area Plan (WMA) that will be developed pursuant to this Order.

The CSWMP is the unified plan consisting of programs developed under the Storm Water Management Program Requirements of this Order.

The WMA is the comprehensive implementation plan for a specific Watershed Management Area (WMA) based on the requirements of this Order, the CSWMP, and any other applicable actions that address pollutants of concern and other water quality issues unique to that WMA toward the objective of reducing pollutants in discharges to the maximum extent practicable. Upon approval by the Executive Officer, the WMA will supersede the CSWMP.

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I. Program Management

Table 1 shows the summary of program management requirements and their corresponding compliance dates.

Table 1  
Program Management Requirements and Compliance Dates

Requirement	Permit Section	Principal Permittees	Permittees	Compliance Date (Months from Order Adoption)
Prepare budget summary format	LD.1	✓		3
Submit annual budget summary to Principal Permittees	LD.2		✓	60 days after budget adoption
Demonstrate legal authority	IE.2		✓	120 days

A. Responsibilities of Principal Permittees

The County of Los Angeles is hereby designated as the Principal Permittee, and as such shall:

1. Coordinate permit activities among permittees and act as liaison between Permittees and the Regional Board on general permit issues;
2. Provide personnel and fiscal resources for the development and update the CSWMP and WMAPs and components thereof;
3. Convene the Watershed Management Committees (WMCs) constituted pursuant to Part 2. I.C upon designation of representatives thereof;
4. Provide technical and administrative support for committees that will be organized to implement this Order;
5. Implement the Countywide Monitoring Program required in this Order;
6. Provide personnel and fiscal resources for the preparation and submittal to the Regional Board of annual reports, and summaries of other reports required under this Order;

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7. Comply with the "Responsibilities of the Permittees" in Part 2.I.B; and
8. Submit to the Regional Board the CSWMP upon completion of the development of all programs under the SWMP requirements.

**B. Responsibilities of the Permittees**

Each Permittee shall:

1. Comply with the requirements of SWMP and CSWMP and amendments thereof;
2. Coordinate among its internal departments and agencies, as appropriate, to facilitate the implementation of the requirements of this Order applicable to such Permittee in an efficient and cost-effective manner;
3. Participate in the development and, if necessary, the update of the CSWMP;
4. Submit in a timely manner to the Principal Permittee an annual report on its implementation of the SWMP and CSWMP;
5. Appoint a technically knowledgeable representative to the appropriate WMC;
6. Participate in the development of the WMAP for its respective watershed management area through its WMC, and shall implement said WMAP upon approval by the Executive Officer; and
7. Work with other agencies, to the extent necessary, and report to the Regional Board on recommendations to resolve any conflicts identified between the provisions of this Order and the requirements of other regulatory agencies, if they deem it necessary.

**C. Watershed Management Committees (WMCs)**

1. Each WMC shall be comprised of a voting representative from each Permittee in the WMA;
2. The WMC's chair and secretary shall be chosen by the WMC. In the absence of volunteer Permittee(s) for the positions, the Principal Permittee shall assume those roles, until the WMC chooses members of the committee to the positions;
3. Each WMC shall:

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- a. Facilitate cooperation and exchange among Permittees;
- b. Establish goals and objectives for the WMA;
- c. Prioritize pollution control efforts;
- d. Participate in the development of the WMAP for its respective WMA after the CSWMP is completed;
- e. Assess the effectiveness of, prepare revisions for, and recommend appropriate changes to the CSWMP and the WMAP;
- f. Coordinate and facilitate the submittal of completed reporting forms to the Principal Permittee for report integration, and assist in the preparation of Annual Reports by the Principal Permittee on permit activities within the WMA for submittal to the Regional Board;
- g. Identify, as part of the Industrial/commercial Source Identification program, additional SIC industrial/commercial groups selected as priorities to be included in the database described in the Public Education, Part 2.V.B.2.a.8. The following criteria shall be considered in the identification process:
  - i. Extent of exposure of the industrial/commercial activity to storm water;
  - ii. Types and quality of non-storm water discharges;
  - iii. Similarity of industrial/commercial activity to industrial activity regulated under the USEPA Phase 1 facilities;
  - iv. Types of chemicals and wastes generated that can contaminate storm water;
  - v. Existence of duplicate regulatory programs with other agencies that emphasize waste management and minimize exposure of the industrial/commercial activity to storm water;
  - vi. Number of facilities in the WMA;
  - vii. Professional understanding of the industrial/commercial sector's waste management practices;
  - viii. Experience of local agency industrial inspection programs; and

- ix. Any other information that indicates a significant potential for contamination of storm water.

**D. Fiscal Resources**

1. The Principal Permittee, in consultation with the Permittees, shall prepare a budget summary format not later than 3 months from the adoption of this Order for use by each Permittee to report resources available to implement the SWMP.
2. Each Permittee shall submit to the Principal Permittee a summary of resources dedicated for storm water program implementation, not later than 60 days after budget adoption by the Permittee's elected local governing body. A Permittee may provide all necessary data in an alternate format which includes the same information unless directed otherwise by the Executive Officer.

**E. Legal Authority**

1. Pursuant to the time frame set forth in E.2, each Permittee shall demonstrate that it possesses legal authority necessary to control discharges to and from those portions of the MS4 over which it has jurisdiction so as to comply with this Order. This legal authority may be demonstrated by either a single ordinance or a single guidance document containing all the applicable statutes, ordinances, permits, contracts, orders or agreements which govern a Permittee's storm water management activities, as required by 40 CFR 122.26(d)(2)(i).

Each Permittee shall either individually or collectively possess the legal authority to:

- a. Control the contribution of pollutants to the MS4 by storm water discharges associated with industrial activity and the quality of storm water discharged from sites of industrial activity, through the following prohibitions and requirements:
  - i. Prohibit the discharge of untreated wash waters to the MS4 when gas stations, auto repair garages, or similar use facilities are cleaned;
  - ii. Prohibit the discharge of untreated wastewater to the MS4 from mobile auto washing, steam cleaning, mobile carpet cleaning, and other such mobile commercial and industrial operations;

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- iii. Prohibit to the maximum extent practicable, discharges to the MS4 from areas where repair of machinery and equipment, including motor vehicles, which are visibly leaking oil, fluid or antifreeze is undertaken;
  - iv. Prohibit discharges to the MS4 from storage areas of materials containing grease, oil, or other hazardous substances (e.g., motor vehicle parts), and unsealed receptacles containing hazardous materials;
  - v. Prohibit discharges of swimming pool filter backwash to the MS4;
  - vi. Prohibit washing toxic materials from paved or unpaved areas which results in a discharge to the MS4;
  - vii. Prohibit washing impervious surfaces in industrial/ commercial areas which results in a discharge to the MS4, unless specifically required by State or local health and safety codes or permitted under a separate NPDES permit;
  - viii. Prohibit the washing out of concrete trucks into storm drains;
  - ix. Require regular sweeping or other equally effective measures to remove debris from industrial/commercial motor vehicle parking lots with more than twenty-five parking spaces that are located in areas potentially exposed to storm water;
  - x. Require placement of machinery or equipment that is to be repaired or maintained in areas susceptible to or exposed to storm water, in a manner where leaks, spills and other maintenance related pollutants are not discharged to the MS4;
- b. Prohibit illicit discharges and illicit connections to the MS4 and require removal of illicit connections.
  - c. Control the discharge of spills and the dumping or disposal of materials other than storm water to the MS4 through the following prohibitions or requirements:
    - i. Prohibit littering;
    - ii. Prohibit the disposal of leaves, dirt, or other landscape debris into a storm drain;

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- iii. Prohibit the use of any pesticide, fungicide, or herbicide, the use of which is prohibited by the USEPA or the California Department of Pesticide Regulation;
  - iv. Require proper disposal of food wastes by the food service and food distribution industry;
  - v. Require disposal of hazardous wastes at appropriate disposal sites and not in trash containers used for municipal trash disposal; and
  - vi. Require removal and proper disposal of all fuel and chemical residue, animal waste, garbage, batteries, or other types of potentially harmful materials which are located in areas susceptible to, or exposed to, storm water.
- d. Control, through interagency or inter-jurisdictional agreements among Permittees or any other alternative means, the discharge of pollutants from one portion of the MS4 to another.
- e. Require compliance with conditions in ordinances, permits, contracts, or orders.
- f. Conduct inspection, surveillance, and/or monitoring procedures necessary to determine compliance or noncompliance with permit conditions including the prohibition on illicit discharges to the MS4.
2. Each Permittee shall:
- a. Provide to the Principal Permittee for submittal to the Regional Board not later than 120 days after the adoption of this Order copies of ordinances, regulations, and other legal documents establishing legal authority, or in the alternative:
    - i. A statement by its representative legal counsel that the Permittee has obtained all necessary legal authority to comply with this Order, referencing that legal authority with specificity; and/or
    - ii. If Part 2.I.E.2.a.i. is only partially fulfilled, a timely schedule for obtaining adequate legal authority to comply with this Order, enumerating, with specificity, the legal authority that remains to be obtained.

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- b. Exercise full legal authority within its jurisdiction to require compliance with this Order, the CSWMP, and/or the WMAPs.

F. Best Management Practice (BMP) or Requirement Substitution/Elimination

A Permittee may petition the Regional Board to:

1. Substitute any BMP or requirement identified in this Order, the CSWMP, or the WMAP, if the Permittee can document that the proposed alternative BMP:
  - a. will meet the objective of the original BMP or Order requirement to achieve a similar or greater reduction in storm water pollutants; and
  - b. will be implemented within a similar period of time.
2. Eliminate any BMP or requirement identified in this Order, the CSWMP, and/or the WMAP, if it can document that:
  - a. The BMP is not technically feasible and no substitute is available;
  - b. The cost of implementation outweighs the pollution control benefits; or
  - c. The BMP is not applicable in the Permittee's jurisdiction.

The Executive Officer may approve or disapprove the petition in accordance with Part 2.I.G and I.H.

G. Administrative Review

The administrative review process formalizes the procedure for review and acceptance of reports and documents submitted to the Regional Board under this Order. In addition, it provides a method to resolve any differences in compliance expectations between the Regional Board and Permittees, prior to initiating enforcement action.

1. Storm water program documents, including progress reports, guidelines checklists, BMPs, databases, program summaries, and implementation and compliance schedules, developed by a Permittee under the provisions of this Order shall be submitted to the Regional Board. The Executive Officer will notify the Permittee and the Principal Permittee of the results of the review and approval or disapproval within 120 days. If the Executive Officer has not responded within 120 days following submittal, the

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Permittee shall implement program components as submitted. However, the Executive Officer may thereafter require modifications to the program consistent with this Order.

2. Documents that require formal Regional Board approval will undergo public review and comment before Board consideration at a public meeting. If the Executive Officer determines that a Permittee's storm water program is insufficient to meet the provisions of this Order, the Executive Officer shall send a "Notice of Intent to Meet and Confer (NIMC)" to the Permittee, with specific information in support of the determination. The NIMC shall include a time frame by which the Permittee must meet with Regional Board staff.
  - a. The Permittee, upon receipt of a NIMC, shall meet and confer with Regional Board staff to demonstrate that the Permittee's program is sufficient to meet the requirements of this Order; and, if not, seek clarification on the steps to be taken to completely meet the provisions of this Order. The meet and confer period will conclude with either a notice of program sufficiency to the Permittee, or the submittal to and acceptance by the Executive Officer of a written "Storm Water Program Compliance Amendment (SPCA)" which shall include implementation deadlines. The Executive Officer may terminate the meet and confer period after a reasonable period due to a lack of progress on issues and may order submittal of the SPCA by a specified date. Failure to submit an acceptable SPCA by the specified date shall constitute a violation of this Order.
  - b. The Executive Officer will approve or reject the submitted SPCA or an amended SPCA within 120 days. Rejection of a SPCA by the Executive Officer shall state the reasons for the failure to approve the SPCA. A Permittee that receives a rejection of an SPCA shall have sixty (60) days to remedy the specified deficiency and resubmit the SPCA. If the Executive Officer has not responded within 120 days following submittal of an SPCA, the Permittee shall implement the SPCA as submitted.
  - c. The Permittee shall comply with the terms of the SPCA. The Permittee shall submit reports to the Executive Officer on progress made under the SPCA. The frequency of progress report submittal shall be quarterly unless otherwise prescribed by the Executive Officer. Failure to comply with the terms and conditions of the SPCA shall constitute a violation of this Order and shall be cause for enforcement action by the Regional Board.

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H. Public Review

1. The Principal Permittee shall maintain a current mailing list of interested parties, organized by WMAs, for distribution of documents that require the Regional Board's approval. The Regional Board will provide the Principal Permittee with the initial list of interested parties.
2. The Principal Permittee shall distribute for public comment the initial CSWMP, WMAPs, and other storm water program requirements that are submitted to the Executive Officer for approval. Interested parties wishing to have their comments considered prior to Regional Board action on these documents must submit their comments in writing to the Regional Board not later than 45 days after the Principal Permittee has made the document available to the public which will also be the date of submittal to the Regional Board. This 45 days comment period is part of the 120 day review period for documents submitted for Executive Officer's approval.

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II. Illicit Connections and Illicit Discharges

Table 2 shows the summary of requirements under this section and their corresponding compliance dates.

Table 2  
Illicit Connections and Discharges Requirements and Compliance Dates

Requirement	Permit Section	Principal Permittee	Permittees	Compliance Date (Months from Order Adoption)
Develop model illicit connection elimination program	H.A.1	✓		8 months
Implement illicit connection elimination program	H.A.2		✓	4 months after EO* approval of model
Develop model illicit discharge elimination program	H.B.1	✓		8 months
Implement illicit discharge elimination program	H.B.2		✓	4 months after EO* approval of model
Conduct a study of municipal street and sidewalk washing	H.C.3		✓ (City of Los Angeles))	Within 12 months from EO* date of determination
Implement non-storm water management program BMPs	H.C.3		✓	3 months
Develop standard program for public reporting of illicit discharges and illicit disposal practices	H.D.1	✓		8 months
Implement standard program to facilitate public reporting of illicit discharges and illicit disposal practices	H.D.2		✓	4 months after EO* approval of standard program
Develop standard program for reporting hazardous substances	H.D.3	✓		8 months
Implement standard program for reporting hazardous substances	H.D.4		✓	4 months after EO* approval of standard program

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**A. Illicit Connections**

1. The Principal Permittee, in consultation with the Permittees, shall develop a countywide model program for elimination of illicit connections to the MS4 not later than 8 months after adoption of this Order. The program shall include, at a minimum:
  - a. Standardized storm drain inspection procedures, and illicit connection identification and elimination procedures;
  - b. Methods to prioritize potential problem areas, including, but not limited to old commercial/industrial areas, and areas with heavy industry listed under subchapter N of 40 CFR Parts 405 - 471;
  - c. Methods to utilize results of field screening activities, and other appropriate information;
  - d. Standardized record keeping to document illicit connections; and
  - e. Enforcement procedures to terminate illicit connections.
2. Each Permittee, based on the countywide model program, shall develop and implement as appropriate a program to identify and eliminate illicit connections to the maximum extent practicable, not later than 4 months after the approval of the model program by the Executive Officer. Such programs shall include storm drain inspection schedules for illicit connections.

**B. Illicit Discharges**

The primary responsibility for cleanup and removal of illicit discharges of pollutants to the MS4 shall be with the owner/operator of the discharging facility or site. Nothing in this Order shall be interpreted to limit or in any way prevent action by a Permittee against the party responsible for the illicit discharge.

1. The Principal Permittee, in consultation with the Permittees, shall develop a countywide model illicit discharges elimination program not later than 8 months after adoption of this Order. The program shall include, at a minimum:
  - a. Standardized enforcement procedures, including administrative and judicial, to eliminate illicit discharges;
  - b. Standardized procedures for investigation, containment and cleanup

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for spills, which include a procedure to ensure that sewage treated with disinfection agents will not be discharged into the storm drain system to the extent practicable;

- c. Prioritization of problem areas of illicit disposal where inspection, cleanup, and enforcement are necessary to prevent the discharge of contaminants;
  - d. Standardized surveillance program to detect illicit discharges;
  - e. Standardized procedures to educate inspectors, maintenance workers, and other field staff to notice illicit discharges during the course of their daily activities, and report such occurrences;
  - f. Standardized record keeping system to document illicit discharges;
  - g. Standardized enforcement procedures to eliminate illicit discharges and
  - h. Industrial/commercial education and outreach materials to inform businesses about the problem of illicit discharges/dumping and proper discharge/disposal practices.
2. Each Permittee shall, based on the countywide model program, not later than four months after approval of the model program by the Executive Officer, develop and implement, as appropriate, a program to identify and eliminate illicit discharges.

C. Non-Storm Water Discharges

Non-storm water discharges in compliance with a separate NPDES permit/Waste Discharge Requirements (WDR) or granted a discharge exemption by the Regional Board or the State Water Resources Control Board are not prohibited under this Order.

1. Exempted Discharges

The following non-storm water discharges need not be prohibited:

- a. Flows from riparian habitats or wetlands;
- b. Diverted stream flows;
- c. Springs;
- d. Rising ground waters;
- e. Uncontaminated groundwater infiltration; and

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- f. Discharges or flows from emergency fire fighting activities.

The Executive Officer, upon presentation of evidence in accordance with Part 2.II.C.4. may include other categories of non-storm water discharges under this subsection.

2. Conditionally Exempted Discharges

The following non-storm water discharges need not be prohibited. However, if they are identified by either a Permittee or the Executive Officer as being significant sources of pollutants to receiving waters, then appropriate BMPs to minimize the adverse impacts of these sources shall be developed and implemented under the CSWMP or the WMAPs:

- a. Landscape irrigation;
- b. Water line flushing;
- c. Potable water sources provided the discharges are managed in accordance with the Industry-wide Standard Pollution Prevention Practices developed by the American Water Works Association, California-Nevada Section, or equivalent document; and in compliance with any requirements established by the Permittee(s);
- d. Foundation drains;
- e. Footing Drains;
- f. Air conditioning condensate;
- g. Irrigation water;
- h. Lawn watering;
- i. Water from crawl space pumps;
- j. Dechlorinated swimming pool discharges; and
- k. Individual residential car washing;
- l. Street washing

The Executive Officer, upon presentation of evidence in accordance with Part 2.II.C.4. may include other categories of non-storm water discharges under this subsection.

3. Designated Discharges

Municipal street washing and sidewalk washing discharges have been determined by the Regional Board to be sources of pollutants of concern. The City of Los Angeles will conduct a study to characterize municipal street washing and sidewalk washing, assess the impacts of such activities, and recommend appropriate BMPs to control any adverse impact. The City of Los Angeles will submit its recommendations to the Regional Board not later than one year from adoption of this Order.

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The Executive Officer will determine within three months of the City of Los Angeles submittal which BMPs the Permittees shall implement. The Permittees will have three months from the date of the Executive Officer decision to implement the BMPs where applicable.

The Executive Officer, upon presentation of evidence, may include other categories of non-storm water discharges under this subsection.

4. Procedures for Exemption

A Permittee may identify and describe additional categories of non-storm water discharges to be considered by the Executive Officer for exemption from the Discharge Prohibitions. The criteria to be considered for a request for exemption are:

- a. Documentation that the discharge are not significant sources of pollutants to receiving waters or do not cause impairment of beneficial uses of receiving waters;
- b. Special circumstances that have been defined in which the discharges have been found not to be sources of pollutants to, or do not cause impairment of beneficial uses of receiving waters;
- c. Specific BMPs, where determined feasible, that have been identified to reduce pollutants in discharges to the maximum extent practicable and minimize adverse impacts of such sources, with an implementation schedule; or
- d. Established procedures to ensure BMP implementation, including an implementation schedule, performance standards, monitoring and record keeping.

The exemption request for additional non-storm water discharges may be submitted, beginning with the first Annual Report. The exemption becomes effective upon approval by the Executive Officer.

D. Public Reporting

- 1. The Principal Permittee, in consultation with the Permittees, shall develop a countywide standard program to promote, publicize, and facilitate public reporting of illicit discharges and illicit disposal practices not later than 9 months after adoption of this Order. The program may include, but not be limited to:

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- a. A system to receive incoming complaints;
  - b. A communication network to link Permittees so that action can be coordinated and complaints can be investigated promptly; and
  - c. A system to notify the complainant of any action taken, if appropriate.
2. Each Permittee shall implement the countywide illicit discharges and illicit disposal reporting program not later than four months after the approval by the Executive Officer.
  3. The Principal Permittee, in consultation with the Permittees, shall develop a countywide program not later than 8 months after adoption of this Order, for reporting incidents of 'reportable quantity' of hazardous substances entering the MS4. The incidents shall be reported to the State of California Office of Emergency Services (OES) [current number, (800) 852-7550] and the Federal Hazardous Response Center [current number, (800) 424-8802].
  4. Each Permittee shall implement the countywide program for reporting hazardous substances entering the MS4, not later than four months after approval by the Executive Officer.

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III. Development Planning and Construction

A. Development Planning

Table 3 shows the summary of requirements under this section and their corresponding compliance dates.

Table 3  
Development Planning Requirements and Compliance Dates

Requirement	Permit Section	Principal Permittee	Permittee	Compliance Date (Months from Order Adoption)
Develop recommended BMPs for development projects (countywide guidelines)	III.A.1.a	✓		18
Develop Standard Urban Storm Water Mitigation Plans	III.A.1.b	✓		6 months after EO* approval of countywide guidelines
Develop a model system for prioritization of development projects	III.A.2	✓		18
Implement a system for prioritization of development projects	III.A.2		✓	6 months after EO* approval of model system
Develop and implement a program for planning measures consistent with the Standard Urban Storm Water Mitigation Plan (SUSMP)	III.A.3		✓	6 months after EO* approval of SUSMP
Develop guidelines for preparing/reviewing CEQA documents	III.A.4.a	✓		18
Incorporate CEQA guidelines into internal procedures	III.A.4.a	✓	✓	6 months after EO* approval of guidelines
Include watershed and storm water management considerations into General Plan revisions	III.A.4.b		✓	During General Plan revisions
Develop a model program to inform developers seeking approvals about BMPs	III.A.5	✓		18
Implement developer information program	III.A.5.c		✓	6 months after EO* approval of model

\* Executive Officer

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1. Countywide Guidelines

- a. The Principal Permittee in consultation with the Permittees shall develop a list of recommended BMPs (countywide guidelines) for use during planning and permitting of all development projects requiring discretionary approval not later than 18 months after adoption of this Order. The BMPs shall include:

- i. Site planning practices;
- ii. Post-construction best management practices; and
- iii. Redevelopment and infill practices.

The recommendations shall consider the type of development and the potential for storm water pollution when determining the applicability of BMPs. Cost effectiveness, ease of maintenance, and consistency with other environmental mandates may also be considered.

For utilization where increased storm water discharge rates will result in an increase in downstream erosion potential, the recommendations shall include BMPs which can be used to maintain peak runoff rates at pre-development levels to the maximum extent feasible.

- b. The Principal Permittee, in consultation with the Permittees, shall develop Standard Urban Storm Water Mitigation Plans and guidelines for their preparation not later than six months after Regional Board approval of the BMPs in Part 2.III.A.1.a. The Plans shall incorporate the appropriate elements of the recommended BMPs in the Countywide Guidelines. At the minimum, standard plans and guidelines shall be prepared for the following development categories:

- i. a 100+ home subdivision;
- ii. a 10-home subdivision;
- iii. a 100,000+ square-foot commercial development;
- iv. an automotive repair shop;
- v. a retail gasoline outlet;
- vi. a restaurant; and
- vii. a hillside-located single-family dwelling.

2. Prioritization of Development Projects

- a. Priority Projects are development and redevelopment projects requiring discretionary approval which the Building Official (or equivalent municipal authority) determines may have a potential

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significant effect on storm water quality.

- b. **Exempt Projects** are development and redevelopment projects which the Building Official (or equivalent municipal authority) determines will not have a potential significant impact on storm water quality.

The Principal Permittee, in consultation with the Permittees, shall develop a model documented system, such as a checklist, for determining "potential significant effect" as well as a list of specifically exempt projects not later than 18 months after adoption of this Order. Each Permittee shall incorporate a substantially similar system into its procedures not later than six months after the approval of the documented system by the Executive Officer.

The documented system shall consider location of the project with respect to designated environmentally sensitive areas, the slope and erosion potential of the site and surrounding areas.

3. **Planning Control Measures**

Each Permittee shall develop a program to carryout planning control measures for priority projects (Part 2.III.A.2.a) consistent with the countywide model. The program shall be implemented not later than six months after approval of the model by the Executive Officer. Each Permittee shall require that the project applicant submit an Urban Storm Water Mitigation Plan, and that the Permittee approve the Plan prior to the issuance of any grading or building permit. The Urban Storm Water Mitigation Plan shall incorporate by detail or reference appropriate post-construction BMPs to:

- a. Implement, to the maximum extent practicable, requirements established by appropriate governmental agencies under CEQA, Section 404 of the Clean Water Act, local ordinances and other legal authorities intended to minimize impacts from storm water runoff on the biological integrity of natural drainage systems and water bodies;
- b. Maximize, to the maximum extent practicable, the percentage of permeable surfaces to allow more percolation of storm water into the ground;
- c. Minimize, to the maximum extent practicable, the amount of storm water directed to impermeable areas and to the MS4;
- d. Minimize, to the maximum extent practicable, parking lot pollution

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through the use of appropriate BMPs such as retention, infiltration, and good housekeeping;

- e. Establish reasonable limits on the clearing of vegetation from the project site including, but not limited to, regulation of the length of time during which soil may be exposed and, in certain sensitive cases, the prohibition of bare soil; and
- f. Provide for appropriate permanent controls to reduce storm water pollutant load produced by the development site to the maximum extent practicable.

4. Planning Process

In order to integrate storm water management considerations into discretionary development projects at the time that they are first proposed to jurisdictions, and to support other provisions of this Order:

- a. The Principal Permittee, in consultation with the Permittees, shall develop, storm water management guidelines for use in preparing/reviewing CEQA documents, and in linking storm water quality mitigation conditions to local discretionary project approvals not later than 18 months after adoption of this Order.

The guidelines shall address the preservation or restoration of areas that provide water quality benefits such as riparian corridors and wetlands and shall promote protection of the biological integrity of drainage systems and water bodies.

Each Permittee shall review the guidelines for the purpose of making appropriate modifications in their internal procedures not later than six months after the Executive Officer's approval of the guidelines.

- b. Each Permittee shall include watershed and storm water management considerations in the process whenever a Permittee engages in a significant rewrite of the Permittee's General Plan elements for:
  - i. Conservation; or
  - ii. Open space; or
  - iii. Land-use; or
  - iv. Public utilities; or
  - v. Infrastructure.

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The Permittee may refer applicants to the *Best Management Practices Handbooks, California Storm Water Quality Task Force, Sacramento, CA, 1992*, and its revisions; the Countywide Storm Water Management Plan, *USEPA Guidance Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters, Issued under the Authority of Section 6217(g) of the Coastal Zone Act Reauthorization Amendments of 1990, Document No. EPA 840 B 92-002 (1993)*, and similar manuals for specific guidance on selecting post-construction BMPs for reducing pollutants in storm water discharges.

5. **Developer Information Program**

The Principal Permittee, in consultation with the Permittees, shall develop a model program not later than 18 months after adoption of this Order to inform developers seeking discretionary approvals about:

- a. Development and construction storm water management;
- b. Maximization of pervious areas and storm water infiltration (where geology and topography permit); and
- c. Cost effective storm water pollution control measures.

The program shall provide specific guidance on selecting BMPs to reduce pollutants in storm water discharges from urbanized areas, and include appropriate BMPs, educational materials, and handbooks and guidelines described in Part 2. III.A.4.

Each Permittee shall implement a developer information program consistent with the model program not later than six months after approval of the model by the Executive Officer. Each Permittee's program shall include information about its legal authorities. Permittees are encouraged to engage in joint efforts in implementing the program.

B. **Development Construction**

Table 4 shows the summary of requirements and their corresponding compliance dates under this section.

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**Table 4**  
**Development Construction Requirements and Compliance Dates**

Requirement	Permit Section	Principal Permittee	Permittees	Compliance Date (Months from Order Adoption)
Develop Recommended BMPs for construction (countywide guidelines)	III.B.1.	✓		14
Develop and implement a regulatory countywide guidelines	III.B.2.a		✓	6 months after EO* approval of guidelines
Require applicants to demonstrate coverage under State Construction General Permit prior to issuance of grading permits	III.B.2.b		✓	6
Develop a model construction inspection program	III.B.3.a	✓		14
Implement a construction inspection program	III.B.3.b		✓	6 months after EO* approval of model

\* Executive Officer

**1. Countywide Guidelines**

The Principal Permittee, in consultation with the Permittees and appropriate stakeholder organizations, shall develop not later than 14 months after adoption of this Order, minimum recommended requirements and Best Management Practices (BMPs) for all development project construction activities (countywide guidelines). Requirements and BMPs appropriate for various activities shall be developed along with checklists for use in design and inspection. The Countywide Guidelines shall:

- a. Include erosion and sediment control practices;
- b. Address multiple construction activity related pollutants;
- c. Focus on BMPs such as source minimization, education, good housekeeping, good waste management, and good site planning;

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- d. Target construction areas and activities with the potential to generate significant pollutant loads;
- e. Require retention on the site, to the maximum extent practicable, of sediment, construction waste, and other pollutants from construction activity;
- f. Require, to the maximum extent practicable, management of excavated soil on site to minimize the amount of sediment that escapes to streets, drainage facilities, or adjoining properties;
- g. Require, to the maximum extent practicable, use of structural drainage controls to minimize the escape of sediment and other pollutants from the site.
- h. Require, to the maximum extent practicable, containment of non-storm water from equipment and vehicle washing at construction sites, unless treated to remove sediments and pollutants.

2. Construction Control Measures

- a. Each Permittee shall develop a regulatory program for construction activities consistent with the countywide guidelines not later than six months after the Executive Officer's approval of the minimum recommended requirements and BMPs in Part 2.III.B.1. The Program shall require, prior to the issuance of any building or grading permit, preparation of appropriate wet weather erosion control and storm water pollution prevention plans which include, by detail or reference, all appropriate construction BMPs contained in the countywide guidelines.

Priority Project plans must include a narrative discussion of the reasons used for selecting or rejecting BMPs. In lieu of a narrative, the project architect or engineer of record may sign a statement on the plan to the effect: "As the architect/engineer of record, I have selected appropriate BMPs to effectively minimize the negative impacts of this project's construction activities on storm water quality. The project owner and contractor are aware that the selected BMPs must be installed, monitored, and maintained to ensure their effectiveness. The BMPs not selected for implementation are redundant or deemed not applicable to the proposed construction activities."

- b. Each Permittee shall implement a procedure not later than 6 months

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after adoption of this Order whereby the Permittee shall not issue a grading permit for developments with disturbed areas five acres or greater unless the applicant can show that (i) a Notice of Intent (NOI) to comply with the State Construction Activity Storm Water Permit has been filed and (ii) a Storm Water Pollution Prevention Plan (SWPPP) has been prepared.

3. Site Inspection

- a. The Principal Permittee, in consultation with the Permittees, shall develop a model construction activity inspection program, which includes checklists, not later than 14 months after adoption of this Order. The model program shall include but not be limited to:
  - i. Procedures for construction site inspections;
  - ii. Procedures to require corrective action be undertaken by contractors at noncomplying sites;
  - iii. Procedures for enforcement action against noncomplying construction activity; and
  - iv. Appropriate training for program staff.
- b. Each Permittee shall implement a construction activities inspection program based on the model program not later than six months after the Executive Officer's approval of the model program. The program may be integrated with the Permittees regular program of construction inspection for maximum efficiency.

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**IV. Public Agency Activities**

Table 5 shows the summary of requirements under this section and their corresponding compliance dates.

**Table 5  
Public Agency Activities Requirements and Compliance Dates**

Requirement	Permit Section	Principal Permittee	Permittees	Compliance Date (Months from Order Adoption)
Evaluate existing public agency activities and develop a model program to reduce storm water impacts	IVA	✓		18
Develop a program to reduce storm water impacts from public agency activities with a schedule for implementation	IVB		✓	4 months after EO* approval of model

\* Executive Officer

**A. Public Agency Model Program**

The Principal Permittee, in consultation with the Permittees, shall evaluate existing public agency activities and develop a model program to reduce the impact of public agency activities on storm water quality not later than 18 months after adoption of this Order. The countywide model shall be submitted to the Regional Board for approval.

**B. Permittee Public Agency Programs**

Each Permittee shall develop a Public Agency Program based on the model program developed by the Principal Permittee, with an implementation schedule not later than four months after the approval of the countywide model by the Executive Officer.

**C. Program Requirements**

Both the model program and the Permittee programs shall at a minimum include, where applicable:

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1. Sewage Systems Operations

- a. Procedures to keep sewage spills or leaks from facilities operated by a Permittee from entering the MS4 to the maximum extent practicable;
- b. Procedures to identify, repair, and remediate sanitary sewer blockages, exfiltration, overflow, and wet weather overflows from sanitary sewers operated by a Permittee to the MS4;
- c. Procedures to respond to overflows, follow-up tests, and investigate complaints;
- d. Procedures to insure that the Permittee is able to investigate any suspected connections or cross connections from the sanitary sewer systems to the MS4, using techniques such as field screening, sampling, smoke/dye testing, and TV inspection, as appropriate; and
- e. Procedures to notify public health agencies with discretionary decision authority on beach closures when there is a threat to public health.

2. Public Construction Activities Management

- a. Storm water management requirements for the design and construction of public facilities consistent with the requirements and time lines specified for private development in Par 2.III.A and III.B. ;
- b. Procedures to seek coverage, as an option, under this Order for construction activity with a disturbed area of five acres or more (Phase 1, 40 CFR 122.26) which are under taken by or on behalf of the Permittee, if the Permittee develops:
  - i. A process for notifying the Regional Board of Permittees' construction activity;
  - ii. A checklist of construction activity BMPs using BAT/BCT criteria for public construction activity;
  - iii. A procedure to verify implementation of construction activity BMPs;
  - iv. A requirement to prepare and retain site specific SWPPPs;

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- v. A procedure to report annually on the effectiveness of SWPPPs at public construction activity, and certify compliance with the requirements in this Order.

3. Vehicle Maintenance/Material Storage Facilities Management

- a. Model pollution prevention plan for public vehicle maintenance/material storage facilities which have the potential to discharge pollutants into storm water. A public vehicle maintenance/material storage facility is any Permittee-owned or operated facility or portion thereof that:
  - i. Conducts industrial activity, operates equipment, handles materials, and provides services similar to Federal Phase 1 facilities;
  - ii. Performs fleet vehicle maintenance on ten or more vehicles per day including repair, maintenance, washing, and fueling;
  - iii. Performs maintenance and/or repair of heavy industrial machinery/equipment; and
  - iv. Stores chemicals, raw materials, or waste materials in quantities that require a hazardous materials business plan or a Spill Prevention, Control, and Counter-measures (SPCC) plan.
- b. BMPs to improve site specific pollutant control including but not be limited to:
  - i. Good housekeeping practices;
  - ii. Material storage control;
  - iii. Vehicle leaks and spill control;
  - iv. Illicit discharge control;
  - v. Training for employees on proper outdoor loading/unloading of materials;
  - vi. Vehicle and equipment washing area control;
  - vii. Regular maintenance of treatment structures such as sumps, oil/water separators, or equivalent; and

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viii. Proper waste handling disposal.

4. Landscape and Recreational Facilities Management

- a. Procedures for application of pesticides, herbicides, and fertilizers that will include:
  - i. List of approved pesticides and selective and environmentally responsible use;
  - ii. Product and application information;
  - iii. Application equipment use and maintenance; and
  - iv. Record keeping.
- b. Procedures to minimize storm water pollution by pesticides and fertilizers used for landscape maintenance, including the utilization of Integrated Pest Management (IPM) techniques ;
- c. Procedures to prevent the disposal of landscape waste into the MS4;
- d. Procedures to encourage retention and planting of native vegetation to reduce water, fertilizer, and pesticide needs;
- e. BMPs to reduce exposure of fertilizers and pesticides to storm water during storage, to include as applicable, the following:
  - i. Storage indoors or under cover on paved surfaces;
  - ii. Secondary containment;
  - iii. Reduction in storage and handling of hazardous materials;
  - iv. Regular inspection of storage areas;
- f. Guidelines to schedule irrigation and fertilization to minimize:
  - i. Chemical application during wet season and to terminate chemical application during storm events; and
  - ii. Over watering and nutrients/pesticides entrainment.
- g. Procedures to manage discharges of municipal swimming pool water

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into the MS4, including dechlorination practices, proper disposal of clean-out waters, and piping of filter backwash to the sanitary sewer;

- h. BMPs to minimize trash, debris, and other pollutants from entering Permittee-owned recreational water bodies, to include:
  - i. Routine trash collection along, on, and/or in, water bodies, where feasible; and
  - ii. Public outreach to educate the public about impacts of illicit disposal.

5. Storm Drain Operation and Management

- a. BMPs for Inlet Maintenance to be implemented including but not be limited to:
  - i. Inspection and cleaning of catch basins between May 1 and September 30 of each year;
  - ii. Additional cleaning of catch basins, as necessary, between October 1 and April 30;
  - iii. Record keeping of catch basins cleaned; and
  - iv. Recording of the quantity of catch basin waste collected.
- b. BMPs for Storm Drain Maintenance to be implemented including but not be limited to:
  - i. Proper disposal of material removed;
  - ii. Removal of trash and debris from open channel storm drains at least annually between May 1 and September 30 of each year;
  - iii. Surveillance for debris buildup in open channels during the rainy season.
- c. Waste Management program to include:
  - i. Procedures to identify problem areas of illicit discharge for regular inspection;
  - ii. Procedures to minimize to the maximum extent practicable the

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discharge of contaminants during MS4 cleanup to maintain channel optimum capacity; and

- iii. A review of current maintenance activities to assure that appropriate storm water BMPs are being utilized.
- d. Program to investigate the feasibility of dry weather flow diversion from the MS4 to municipal waste water treatment plants, where appropriate.

6. Streets and Roads Maintenance

- a. Program to sweep curbed streets at a targeted frequency of:
  - i. At least monthly; and
  - ii. Where feasible, areas generating significant refuse more frequently.
- b. Streets and roads maintenance program including:
  - i. BMPs for existing saw-cut management and paving practices to include but not be limited to:
    - aa. Avoidance during wet weather; and
    - bb. Material storage away from drainage areas to prevent storm water pollution or other equally effective BMPs.
  - ii. Good housekeeping practices to insure proper management of any wastes that are generated;
  - iii. Collection, transport, and disposal of maintenance waste at appropriate disposal facilities in accordance with applicable federal, state, and local laws and regulations;
  - iv. Management of concrete materials and wastes including but not be limited to:
    - aa. Washout of concrete trucks off- or on-site in designated areas and not into storm drains, open ditches, streets, or catch basins;
    - bb. Material storage under cover, away from drainage areas

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or other equally effective BMPs; and

cc. Avoidance of excess mixing of concrete or cement on-site.

v. Employee training to:

aa. Promote a clear understanding of the potential for maintenance activities to pollute storm water; and

bb. Identify and select appropriate BMPs;

**7. Parking Facilities Management**

Parking Facilities Management Plan to include periodic hardscape and catch basin cleaning on Permittee owned parking lots with 25 or more parking spaces which may be exposed to storm water, to reduce oil and grease, suspended particulates, metals, and petroleum byproducts.

**8. Public Industrial Activities**

a. Procedures to seek coverage, as an option, under this Order for Phase I industrial facilities which are owned or operated by a Permittee, if the Permittee develops:

- i. A process for notifying the Regional Board of public industrial facilities owned or operated by the Permittee;
- ii. A checklist of BMPs using BAT/BCT criteria for public industrial facilities;
- iii. A procedure to verify implementation of industrial facility BMPs;
- iv. A requirement to prepare and retain site specific SWPPPs; and
- v. A procedure to report annually on the effectiveness of SWPPPs and the results of the facility monitoring programs at public Phase 1 industrial facilities, and certify compliance with the requirements of this Order.

**9. Emergency Procedures**

Procedures for addressing emergency repairs of essential public services and infrastructure and responding to natural disasters.

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**V. Public Information and Participation**

To reach as many Los Angeles County residents as possible, a comprehensive educational outreach approach shall be undertaken under this Order. In recognition of the importance of public education to effective storm water management solutions, this Order calls for immediate permittee public outreach efforts at a specified minimum level as well as a longer term effort to develop an integrated, comprehensive outreach program. As part of the immediate effort, each Permittee is expected to choose an appropriate combination of outreach tools and activities to raise public awareness of storm water issues and improve water quality in its own individual jurisdiction, with efforts at a prescribed minimum level as described below. As part of the longer term effort, each Permittee is expected to work collaboratively to develop a comprehensive outreach/education program countywide and within its watershed management area.

The objectives of the public education program are: (i) to measurably increase the knowledge of the target audiences regarding the MS4, the impacts of storm water pollution on receiving waters, and potential solutions for the target audiences to implement BMPs to reduce the problems caused; and (ii) to measurably change the behavior of target audiences by encouraging those audiences to implement appropriate solutions.

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Table 6 shows the summary of requirements and their corresponding compliance dates under this section.

**Table 6**  
**Public Information and Education Requirements and Compliance Dates**

Requirement	Permit Section	Principal Permittee	Permittees	Compliance Date (Months from Order Adoption)
Have outreach materials available for distribution	V.A.1		✓	8
Demonstrate outreach materials are being distributed	V.A.2.a		✓	12
Demonstrate Permittee employees are being trained	V.A.2.b		✓	12
Complete analysis for targeted audiences	V.A.3	✓ and City of Los Angeles	✓	30
Develop industrial/commercial facility database format	V.B.1.a	✓		8
Collect information based on database format	V.B.1.b		✓	6 months from Principal Permittee providing database format
Compile information from Permittees into industrial/commercial facility database	V.B.1.c	✓		18
Develop a checklist of BMPs for industrial/commercial site visits	V.B.2	✓		10
Implement an Industrial/Commercial facility site visit program	V.B.3.a		✓	See Table 7
Begin use of checklist of BMPs for industrial/commercial site visits	V.B.3.b		✓	Upon EO* approval
Develop a 5 year public education strategy	V.C	✓		12
Implement the 5 year strategy		✓		

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**A. Immediate Outreach**

1. Each Permittee shall, at a minimum, have available for distribution or reference as appropriate, not later than 8 months after adoption of this Order, the following:

**a. Written Material**

- i. Written materials (minimum of three types in addition to those listed below) to convey pertinent information to meet program objectives. Examples of written materials include flyers, brochures, door-hangers, newspaper articles, mail-inserts, and newsletters;
- ii. Documentation that a reasonable effort was made to list pertinent city phone numbers under the government pages of phone directories. This should be updated as necessary and should include telephone numbers for reporting clogged catch basin inlets and/or illicit discharges/dumping, and a general number for storm water management program information. These phone numbers may be city-specific or countywide;
- iii. Training materials for educating appropriate Permittee employees regarding compliance with applicable storm water permits;
- iv. An up-to-date listing of contractor and developer storm water management training programs available in the area. This list should be updated annually or as needed;
- v. An up-to-date checklist and a brochure explaining contractor and developer needs as it relates to Development Planning and Construction (Part 2.III) of this Order for use at a Permittee's planning/permitting counter. This should be updated annually or as needed; and
- vi. Education materials (a minimum of three types) for targeted business sector audiences for use in site visits as per provisions in Part 2.V.B.2 of this Order.

**b. Audio Material**

Documentation that a reasonable effort was made by the Principal Permittee or on behalf of the Permittees as a whole to obtain radio

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broadcast public service announcements to convey information regarding storm water management.

c. **Visual Material**

A catch basin labeling program, including label installation and maintenance schedules, to educate the public on the ultimate destination of storm drain flows.

2. Each Permittee shall demonstrate by 12 months after adoption of this Order, that it has undertaken the following activities:

- a. Distribution of outreach materials to the general public, or targeted audiences such as schools, community groups, contractors and developers at the appropriate public counters and public events; and,
- b. Training of the appropriate Permittee employees (those whose jobs or activities potentially affect storm water quality, or those who respond to questions from the public) regarding the requirements of the storm water management program.

3. The Principal Permittee and the City of Los Angeles shall complete an analysis, not later than 30 months after adoption of this Order, of the general success of outreach materials to residents and businesses to assist in identifying and/or developing public education and outreach goals for target audiences for watershed-wide and countywide outreach and education. Each Permittee shall assist in these efforts through their respective WMC to identify public education and outreach goals and target audiences in the context of watershed-wide and countywide outreach and education.

B. **Industrial/Commercial Educational Program**

Each Permittee shall develop an industrial/commercial site visit program. The purpose of such site visits will be solely educational and to provide industrial/commercial facilities with information regarding the Permittee's storm water program, and to provide advice when requested in understanding and complying with the Permittee's storm water regulations. To minimize cost, each Permittee is encouraged to coordinate its site visit program with existing fire departments, health departments, industrial wastes and/or other inspection type programs so that the Permittee need not institute a new and separate site visit programs. The program shall contain the following components:

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1. Identification of Sources

- a. The Principal Permittee in consultation with the Permittees shall develop a database format for listing industrial/commercial facilities by four digit SIC Industry Numbers not later than 6 months after adoption of this Order. This database will serve as a reference resource for the public, business, industry, local government, the Regional Board, and other public agencies on storm water program participation. The initial accuracy of the database will be dependent on the accuracy of electronic and information sources used to establish the database, but the accuracy is expected to improve after Permittees begin to implement the industrial/commercial site visit program. No legal import is to be attributed to the database developed by the Permittees. The database format shall include at a minimum:

- i. Facility name;
- ii. Site address;
- iii. Watershed;
- iv. Applicable SIC code(s); and
- v. NPDES storm water permit coverage status, if applicable.

- b. Each Permittee shall collect information based on the format developed by the Principal Permittee to identify industrial/commercial facilities within its jurisdiction and submit to the Principal Permittee not later than six months after the Principal Permittee provides the database format to the Permittees. The list of facilities shall include, at a minimum:

- i. All industrial groups regulated under Phase I of the Federal storm water program (40 CFR 122.26; Phase I Facilities);
- ii. Motor vehicle repair shops, motor vehicle body shops, motor vehicle parts and accessories facilities, gas stations, and restaurants; and
- iii. Additional SIC industrial/commercial groups identified as priorities by each WMC pursuant to this Order.

- c. The Principal Permittee shall compile the information submitted by each Permittee into a database of industrial/commercial facilities not later than 16 months after adoption of this Order. This database shall include:

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- I. For each four digit SIC Industry Number, primary activities that might impact runoff discharges (from national or commercial database sources); and
- II. For each four digit SIC Industry Number, primary materials that might impact runoff discharges (from national or commercial database).

2. Source Control Measures

The Principal Permittee, in consultation with the Permittees, shall develop a checklist of specific storm water BMPs for use by Permittees for each industrial/commercial SIC group requiring educational site visits under Part 2.V.B.3. not later than 10 months after adoption of this Order. The BMPs shall:

- a. Address multiple pollutants;
- b. Initially focus on pollutant source minimization, education, good housekeeping, and site design alternatives; and
- c. Target source areas and activities with the highest potential to generate substantial pollutant loads.

After the BMP lists are developed by the Principal Permittee and approved by the Regional Board, each Permittee shall use the checklists as part of the outreach measures conducted during industrial/commercial site visits.

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3. Educational Site Visits

- a. Each Permittee shall implement an industrial/commercial educational site visit program according to the following schedule in Table 7:

Table 7  
Schedule of Educational Site Visits

FACILITIES	SITE VISIT FREQUENCY (No. of Contacts / Time period)
i) Phase I*, [i]-[ix] and [xi] with waste discharge or pretreatment permit	1 / 24 months **
ii) Phase I, [i]-[ix] and [xi] with no waste discharge or pretreatment permit but with GIASP	1 / 24 months**
iii) Phase I, [i]- [ix] with no waste discharge or pretreatment permit, and no GIASP	1 / 24 months**
iv) Phase I [xi] with no GIASP	1 / 5 years***
v) Vehicle repair shops, vehicle body shops, vehicle parts and accessories facilities	1 / 24 months**
vi) Gas stations	1 / 24 months* *
vii) Restaurants	1 / 24 months* *
viii) Facilities selected by WMCs	1 / 36 months

\* See Glossary of Terms for definition

\*\* Minimum of two site visits during the term of this Order

\*\*\* See exception in text below

- i. Phase 1 facilities in categories [i] through [ix] and [xi] which have an industrial waste discharge permit or a pretreatment permit, once every twenty-four months;
- ii. Phase 1 facilities in categories [i] through [ix] and [xi], which do not have an industrial waste discharge permit or a pretreatment permit but have obtained coverage under the GIASP, once every twenty-four months;
- iii. Phase 1 facilities in categories [i] through [ix], which do not have an industrial waste discharge permit, a pretreatment permit or GIASP coverage, once every twenty-four months;
- iv. Phase 1 facilities in category [xi] without an industrial waste discharge permit, a pretreatment permit, or GIASP coverage. In lieu of a site

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visit contact by phone, mail-out of questionnaire and educational materials or other similar method, to inform the facilities of notice of intent (NOI) requirements and encourage good storm water quality control measures (non-responders to be identified in annual report), once in five years;

- v. Vehicle repair shops, vehicle body shops, vehicle parts and accessories (SIC Industry Major Group 75); once every twenty-four months;
- vi. Gasoline stations (SIC Industry Number 5541); once every twenty-four months;
- vii. Restaurants (SIC Industry Number 5812), once every twenty-four months; and,
- viii. Additional SIC industrial/commercial groups identified by the WMC for the watershed in which the Permittee is located, once in thirty-six months, with a maximum limit of 3,000 additional site visits per Permittee during the term of this Order.

b. During the educational site visit, the Permittee shall:

- i. Consult with a representative of the facility to explain applicable storm water regulations;
- ii. Distribute and discuss applicable BMP and educational materials, including information regarding the codes, regulations, and ordinances applicable to the category of the facility;
- iii. Identify Phase 1 facilities where a SWPPP is not available on-site or an NOI has not been submitted to the Regional Board or other appropriate agencies and notify the Regional Board within ninety days of site visit; and,
- iv. Follow-up with facilities, as deemed necessary and appropriate by the Permittee, to provide advice in complying with the Permittee's storm water ordinances, prohibitions, etc.

4. Alternative Programs

A Permittee may petition the Executive Officer to substitute the industrial/commercial educational program with an alternative industrial/commercial educational program that will achieve greater or

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substantially similar educational goals and which will be implemented within a similar period of time.

C. Five-Year Storm Water Public Education Strategy

As a part of the CSWMP and subsequent WMAPs, the Five-Year Storm Water Public Education Strategy shall be developed by the Principal Permittee which elaborates steps for implementing public education programs. The strategy shall: communicate key educational information; develop educational programs for target audiences; utilize various innovative educational tools and incentives for participation; employ effective outreach to the regions multi-ethnic communities; and conduct opinion surveys to assist in evaluating public awareness both before and after implementation of the public education programs.

The Permittees shall endeavor to coordinate public outreach efforts among themselves, with environmental groups, and pertinent public and private agencies.

1. The Principal Permittee, in consultation with Permittees, shall develop not later than 12 months after adoption of this Order, a Five-Year Countywide Storm Water Education Strategy which addresses education/outreach issues countywide as well as by watershed, including a schedule for implementation. The strategy shall include a full range of outreach tools, from simple brochures to sophisticated media. The strategy shall identify the Permittee's responsibilities for implementation, including specific quantifiable objectives for changing knowledge and behavior.

At a minimum, the Five-Year Storm Water Education Strategy shall include actions for:

- a. Identification of land uses and activities that have a higher potential for storm water pollution and will include and/or accomplish the following:
  - i. Pollutants: The reduction of targeted pollutants of concern in a particular watershed; and
  - ii. Activity-specific: Activity-specific outreach programs shall be developed and implemented using written, audio, or visual outreach tools.

The strategy shall include activity-specific outreach programs that inform residents about the problem of illicit discharges and dumping and promote, publicize, and facilitate public reporting of these activities. The program shall also include continuing operation, maintenance, and promotion of the countywide reporting hotline.

- b. Emphasize the importance of pollution prevention for a variety of audiences, including local residents, school-aged children, businesses, and public employees whose job functions and daily lives may impact storm water quality

and will include and/or accomplish the following:

**i. For Residents**

- aa. Educate residents on recycling and household hazardous waste disposal options. The program shall provide information on collection services, including locations and schedule; provide outreach materials on source reduction and proper use, storage, and disposal methods for household hazardous wastes; and continue to encourage residents to recycle e.g., oil, antifreeze, glass, plastics, batteries.
- bb. Encourage residents to participate in specific storm water outreach programs. Residents shall be informed of and provided with the opportunity to share ideas and comments about the programs. Each Permittee shall demonstrate that a good faith effort has been made to outreach to different communities within the watershed management area or region and to receive feedback from the communities while measuring success of the program.
- cc. Educate do-it-yourselfers regarding pollution prevention strategies. Each Permittee shall demonstrate that a good faith effort has been made to outreach to different communities within the watershed management area or region.
- dd. Promote public participation through cooperative programs to foster awareness and identification of storm water pollution issues among residents in a watershed. Catch basin labeling and other established sign programs are examples of this type of cooperative effort. Another example for cooperative outreach is an "Adopt-A-" program. Residents can "adopt" highways, storm drains, catch basins, or streams to monitor, restore, and protect them.
- ee. Residents shall be encouraged to mow vegetation surrounding their residence rather than disk.

**ii. For School Children**

School programs shall be developed and implemented wherever possible to include information on MS4s, the difference between sanitary sewers and storm drains, the importance of preventing storm water pollution, and provide illicit discharges/disposal and reporting procedures, source minimization, and general pollution prevention. Acquisition and/or development of classroom materials and their distribution to teachers are encouraged.

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iii. For Businesses

- aa. An education and outreach program shall be developed and implemented for business activities identified as having greater potential of discharging pollutants into the MS4. This includes sidewalk washing by individual merchants. The program shall encourage employee training on the effectiveness of storm water pollution prevention practices. In addition to written, audio, and visual materials, other possible means of focused outreach may include: conducting workshops, mass mailings, submitting informational articles to trade/industry magazines. Each Permittee shall provide outreach materials through business license renewal counters and/or make efforts to outreach through professional and business associations or industrial/commercial site visits.

bb. Construction

An education program shall be developed and implemented for construction contractors, owners, builders, and do-it-yourselfers on proper BMP implementation and maintenance, and pollution prevention.

iv. Appropriate Permittee Employees

Permittee employees involved in storm water related activities shall be trained on storm water management and pollution prevention practices and the training must include employees at different levels - from program managers to field personnel. Cooperative efforts among enforcement agencies should be encouraged.

Training programs shall include, but not be limited to, articles in city newsletters, training classes, checklists for field personnel, and interdepartmental forums or committees to the extent the Permittee utilizes any of the foregoing. Materials developed for other audiences may also be used in Permittee employee training programs. Appropriate public agency employees shall be trained in:

- aa. Emergency spill cleanup procedures and hotline phone numbers;
- bb. Environmentally sensitive alternative products;
- cc. Good housekeeping practices; and,
- dd. NPDES Municipal and other permitting requirements.

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**VI. Monitoring Program**

**A. Objectives**

The overall goal of this monitoring program is to develop and support effective watershed storm water quality management programs towards reduction of pollutants to the maximum extent practicable.

The major specific objectives of program are as follows:

1. To track water quality status, pollutant trends, pollutant loads, and identify pollutants of concern;
2. To monitor and assess pollutant loads from specific land uses and watershed areas;
3. To identify, monitor, and assess significant water quality problems related to storm water discharges within the watershed;
4. To identify sources of pollutants in storm water runoff;
5. To identify and eliminate illicit discharges;
6. To evaluate the effectiveness of management programs, including pollutant reductions achieved by implementation of BMPs; and,
7. To assess the impacts of storm water runoff on receiving waters.

**B. Monitoring Program Requirements**

The Principal Permittee shall implement the monitoring program described in Attachment C, Monitoring Program Requirements. The summary of the monitoring program requirements and their compliance dates are given in Table 8.

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Table 8  
Monitoring Requirements And Compliance Dates

Requirement	Permit Attachment	Principal Permittee	Permittees	Compliance Date (Months from Order Adoption)
Begin re-evaluation of land-use monitoring station locations	C.1.a	/		
Complete re-evaluation of land-use monitoring station locations	C.1.a	/		Upon EO* approval-Sept 1, 1996
Monitor land use stations at prescribed storm event frequency	C.1.e	/		0
Implement a pilot study monitoring program from one sampler at a land use station to sample storm greater than .1 inches of rainfall	C.1.f	/		0
Monitor at mass emission stations	C.2.a	/		0
Submit a report for characterizing critical sources and BMPs	C.3.b	/		Sept 1, 1996
Conduct a program for characterizing critical sources and BMPs	C.3.b	/		Upon EO* approval
Install and evaluate BMPs appropriate to the critical sources	C.3.d	/		Second full rainy season
Re-evaluate progress made by other entities within the state to evaluate critical sources and BMPs	C.3.e	/		Third full rainy season
Submit a workplan for Loads Assessment model	C.4	/		18
Fund a receiving waters study	C.5	/		
Prepare, retain, and revise a Monitoring Plan	VI.C.1	/		Submit to the EO* when so requested

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**VII. Program Reporting and Evaluation**

Table 9 shows the summary of requirements under this section with their corresponding compliance dates.

**Table 9  
Program Evaluation and Reporting Requirements and Compliance Dates**

Requirement	Permit Section	Principal Permittee	Permittees	Compliance Date (Months from Order Adoption)
Develop a standard Annual Reporting format	VII.A.1	✓		6
Submit an Annual Report	VII.A.2	✓	✓	Every April 15
Submit an Annual Monitoring Report	VII.B	✓		Every August 15
Submit a Program Evaluation Report	VII.C	✓		48
Submit a Receiving Water Impacts Final Report	VII.B.2	✓		64

**A. Annual Program Report**

1. The Principal Permittee shall not later than 6 months after adoption of this Order, develop a standard annual program reporting format for use by Permittees.
2. The Principal Permittee, in coordination with the Permittees, shall submit an Annual Program Report to the Regional Board not later than April 15 of each year. The first Annual Report is due on April 15, 1997. The Annual Program Report shall comply with 40 CFR §122.42(c) and include, at a minimum:
  - a. A review of the status of implementation of the SWMP and CSWMP components with respect to noncompliance with the time schedule specified in this Order, as applicable to each Permittee;
  - b. A summary of program accomplishments by each Permittee, organized by Watershed Management Areas, in the areas of (i)

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Program Management; (ii) Illicit Connections/Discharges; (iii) Development Planning/Construction; (iv) Public Agency Activities; (v) Public Education/Public Participation;

- c. A summary of BMP implementation, Permittee level of effort, and other such measures of achieving storm water program objectives, utilizing uniform information and data collection methodology to support area to area, and year to year comparisons;
- d. Recommended changes and/or modifications to SWMP, CSWMP, and/or WMAP;
- e. A list of additional non-storm water discharge types for potential exemption from Discharge Prohibitions, if desired, and a discussion of how the criteria for exemption have been met for each type;
- f. A report on progress in obtaining full legal authority and/or legal controls for implementing as required in this Order; and
- g. The names, titles, and telephone numbers of personnel responsible for supervising implementation of the program tasks contained in this Order, CSWMP, and/or WMAP, as applicable to each Permittee.

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**B. Annual Monitoring Report**

The Principal Permittee shall submit a separate Annual Monitoring Report not later than August 15 of each year. The first Annual Monitoring Report is due August 15, 1997. The report shall include status of implementation of the monitoring program, results of the monitoring program and interpretation thereof, and suggested modifications or amendments to the Monitoring Program with relevant justifications.

**C. Program Evaluation Report**

- 1. The Principal Permittee shall not later than ~~48 months after adoption of this Order~~, submit a report on assessment of the effectiveness of BMPs implemented, and recommendations on performance standards for each Watershed Management Area. The performance standards will indicate the level of implementation necessary to demonstrate that efforts are being made to control the discharge of pollutants in storm water to the maximum extent practicable.

**D. Receiving Water Impacts Report**

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The Principal Permittee shall not later than 54 months after adoption of this Order prepare and submit an integrated Receiving Water Impacts Final Report. The report shall include, but not be limited to, results of the receiving water impacts evaluation, feasible environmental indicators, and recommendations on integrating storm water receiving water impacts monitoring with regional receiving water monitoring program, if applicable.

**Part 3. STANDARD PROVISIONS**

- I. The initial storm water management program, as delineated in the CSWMP or WMAPs may need to be modified, revised, or amended periodically from time-to-time to respond to changed conditions and to incorporate more effective approaches to pollutant controls. Minor changes may be made at the direction of the Executive Officer. Minor changes requested by the Permittees shall become effective upon written approval of the Executive Officer. If proposed changes involved a major revision in the overall scope of the program, such changes must be approved by the Regional Board as amendments to this Order.
- II. Except as otherwise provided in this Order, all reports or submittals made directly to the Regional Board or through the Principal Permittee shall be signed under penalty of perjury by the principal executive officer or the ranking elected official of the Permittee or a duly authorized representative if:
  - A. The authorization is made in writing by a person described in above;
  - B. The authorization specifies either an individual or a position having responsibility for the overall operation of the Permittee's storm water management program, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the Permittee. A duly authorized representative may thus be either a named individual or any individual occupying a named position; and
  - C. The written authorization is submitted to the Executive Officer.
- III. This Order may be modified, revoked, or reissued prior to the expiration date to:
  - A. Address changed conditions identified in the required reports or other sources deemed significant by the Regional Board;
  - B. Incorporate applicable requirements or statewide water quality control plans adopted by the State Board or amendments to the Basin Plan;

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- C. Comply with any applicable requirements, guidelines, and/or regulations issued or approved pursuant to CWA Section 402(p); and/or
- D. Consider any other federal, or state laws or regulations that became effective after adoption of this Order.
- IV. The Permittees shall continue to implement the BMPs and/or programs that were required pursuant to Order No. 90-079 until such time that replacement BMPs/programs are implemented under this Order.
- V. The issuance of this Order is not intended to, and does not, absolve any Permittee of liability for conduct which may have constituted a violation of Order 90-079 (CA0061654, CI 6948) adopted by this Regional Board on June 18, 1990.
- VI. This Order expires on 5 years after date of adoption of this Order. The Principal Permittee and Permittees must submit complete Reports of Waste Discharge (ROWD) in accordance with Title 23, California Code of Regulations, not later than 180 days in advance of such date as application for reissuance of waste discharge requirements. The ROWD shall include watershed specific WMAPs.

I, Robert P. Ghirelli, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on (date of reissuance).

ROBERT P. GHIRELLI, D.Env.  
Executive Officer

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State of California  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

ORDER NO. 98-XXX  
(NPDES NO. CAS814001)

ATTACHMENTS  
TO  
WASTE DISCHARGE REQUIREMENTS  
FOR  
MUNICIPAL STORM WATER AND URBAN RUNOFF DISCHARGES  
WITHIN THE COUNTY OF LOS ANGELES

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ATTACHMENT A  
LIST OF PERMITTEES  
BY  
WATERSHED MANAGEMENT AREAS

Santa Monica Bay

Malibu Creek and Other Rural

Agoura Hills  
\*Calabasas  
*Los Angeles County*  
Malibu  
Westlake Village

Balboa Creek and Other Urban

Beverly Hills  
Culver City  
El Segundo  
Hermosa Beach  
*Los Angeles*  
*Los Angeles County*  
Manhattan Beach  
Palos Verdes Estates  
Rancho Palos Verdes  
Redondo Beach  
Rolling Hills  
Rolling Hills Estates  
\*Santa Monica  
West Hollywood

Dominguez Channel/  
Los Angeles Harbor  
Drainage

Carson  
Gardena  
Hawthorne  
Inglewood  
Lawndale  
Lomita  
*Los Angeles*  
*Los Angeles County*  
\*Torrance

Los Angeles River

Alhambra  
Arcadia  
Bell  
Bell Gardens  
Burbank  
Commerce  
Compton  
Cudahy  
El Monte  
Glendale  
Hidden Hills  
Huntington Park  
La Canada Flintridge  
\*Long Beach  
*Los Angeles*  
*Los Angeles County*  
Lynwood  
Maywood  
Monrovia  
Montebello  
Monterey Park  
Paramount  
Pasadena  
Rosemead  
San Fernando  
San Gabriel  
San Marino  
Sierra Madre  
Signal Hill  
South El Monte  
South Gate  
South Pasadena  
Temple City  
Vernon

San Gabriel River

Artesia  
Azusa  
Baldwin Park  
Bellflower  
Bradbury  
Cerritos  
Claremont  
Covina  
Diamond Bar  
Downey  
Duarte  
Glendora  
Hawaiian Gardens  
Industry  
Irwindale  
La Habra Heights  
La Mirada  
La Puente  
La Verne  
Lakewood  
\*Long Beach  
*Los Angeles County*  
Norwalk  
Pomona  
Pico Rivera  
San Dimas  
Santa Fe Springs  
Walnut  
West Covina  
Whittier

Santa Clara River

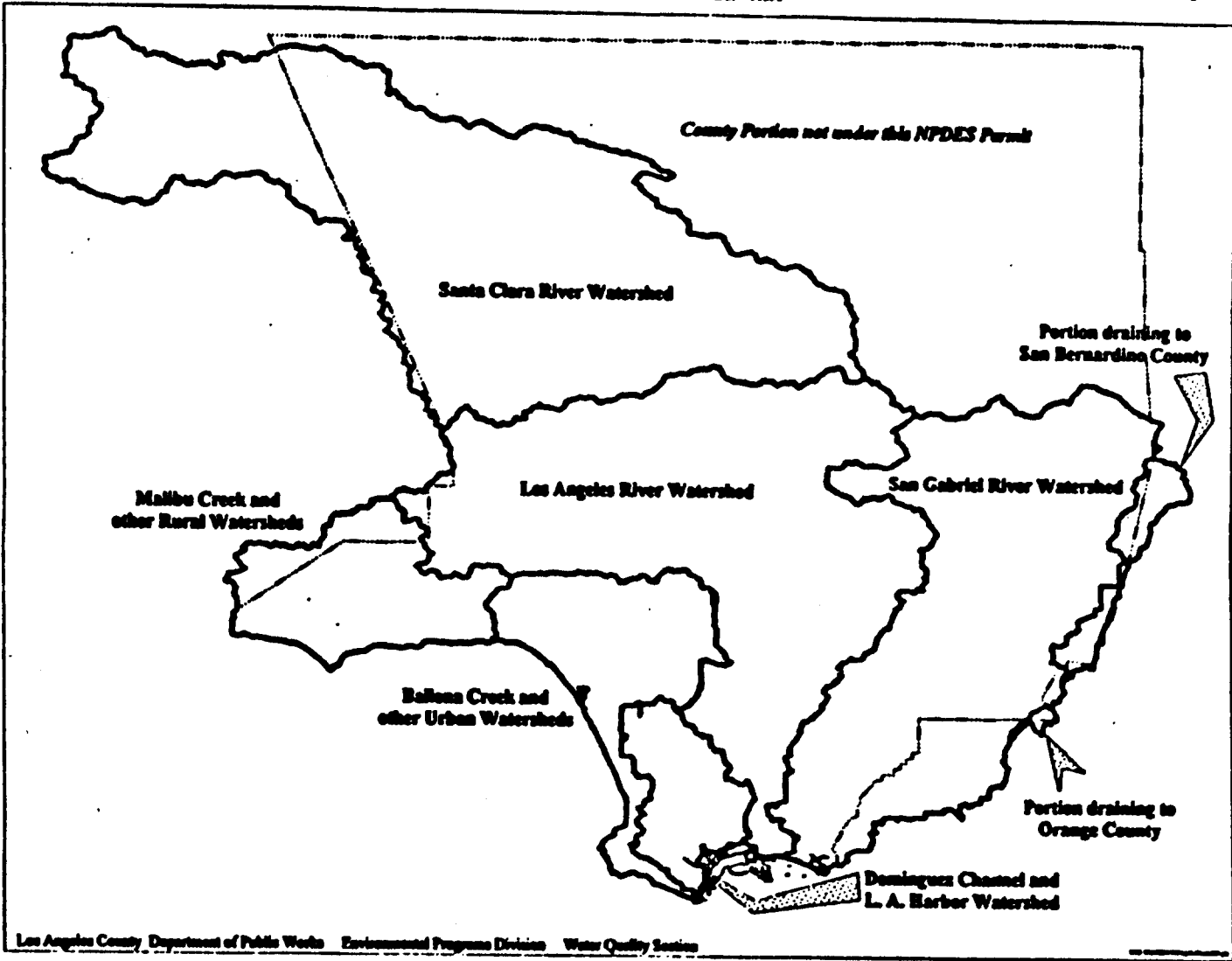
*Los Angeles County*  
\*Santa Clarita

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*Italicized agencies are present in more than one watershed. \* Indicates City with the largest watershed population other than the County of Los Angeles and the City of Los Angeles*

ATTACHMENT  
WATERSHED MANAGEMENT AREA MAP



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**ATTACHMENT C**

**MONITORING PROGRAM REQUIREMENTS**

**A. MONITORING PLAN**

The Principal Permittee shall prepare, maintain, and update, if necessary, a monitoring plan which shall include at a minimum, the following:

1. Quality control, quality assurance, data collection, storage and analyses, and detection limits;
2. All sample collection, handling, storage, and analyses in accordance with 40 CFR 136;
3. Location of monitoring stations, constituents, and sampling frequency;
4. Targeted monitoring indicators (e. g., ecosystem, biological diversity, in stream toxicity, habitat, chemical, sediment, stream health) chosen for monitoring;
5. Statistical methods used to design studies, conduct sampling, and interpret data;
6. A description of the role and responsibilities of all the participants in monitoring studies;
7. A description of computer software and modeling programs that will be utilized to assess data, interpret information; and
8. A general description of how data are intended to be utilized for feedback into the storm water management program.

An up-to-date Monitoring Plan shall be submitted to the Executive Officer, when so requested.

**B. MONITORING PROGRAM**

The following monitoring program is designed to meet the objectives stated under Part 2.VI of this Order.

1. Land Use Station Monitoring
  - a. The Principal Permittee shall reevaluate the location of existing monitoring stations (established under Order No. 90-079) reflecting specific land uses ("land use stations") consistent with the cost-benefit methodology described in Attachment C-

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- 1. Upon completion of Step 6 of the reevaluation process, but not later than September 1, 1996, the Principal Permittee shall submit a report to the Executive Officer outlining the steps taken in the reevaluation process, and recommend land use categories to be monitored. Based on results of the reevaluation process, existing land use stations established pursuant to Order 90-079, may be moved to monitor recommended land use categories for monitoring.
- b. Upon approval of the report by the Executive Officer, the Principal Permittee shall complete Steps 7-8 of the reevaluation process in Attachment C-1.
- c. The Principal Permittee shall monitor land use stations according to the following schedule provided there are sufficient storm events during the season:

<u>Storm Season</u>	<u>Number of Station Events/Storm Season</u>
1996-97	100
1997-98, and thereafter	200

A station event is defined as one sampling event per station.

The land use stations shall be monitored during the term of this Order or until such time that event mean concentrations (EMC) are derived, at the 25% error rate, for the following constituents of concern:

PAHs (total)	Chlordane	Cadmium
Copper	Nickel	Lead
Chromium	Silver	Zinc
Selenium	Mercury	Total Nitrogen
Total Phosphorus	Total Suspended Solids	Diazinon
Chlorpyrifos	Malathion	Simazine
Total DDT	Total PCBs	

The Executive Officer may add or delete constituents of concern.

- d. All samples for land use station monitoring may be taken with the same type of automatic sampler used under Order 90-079. The samplers shall be set to monitor storms totalling 0.25 inches or greater of rainfall. The constituents to be analyzed are listed in Attachment C-3. The Principal Permittee, for land use sites, may exclude constituents from the list that require grab sampling.

In addition, the Principal Permittee shall, as a pilot study, set one land use sampler to monitor storms from 0.1 inch of rainfall. Based upon an assessment of: 1) the

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operational effectiveness of the sampler; 2) the feasibility and effectiveness of sample retrieval and transport; and 3) the ability to reprogram and maintain the 0.1 inch setting at other samplers, the other samplers may be set to monitor storms from 0.1 inch of rainfall.

- e. If a constituent is not detected at the method detection limit (MDL) for its respective test method listed in Attachment C-3 in more than 25 percent of the first ten sampling events or on a rolling basis using the ten most recent sampling events, it will not be further analyzed unless the observed occurrences show high concentrations and are cause for concern. The Principal Permittee will also conduct annual confirmation sampling for non-detected constituents at each station for as long as the station is monitored.

2. Mass Emission Station Monitoring

- a. The Principal Permittee shall monitor a total of four mass emission stations. During the 1995-96 storm season, monitoring shall be conducted only at the Ballona Creek and Malibu Creek monitoring stations established under Order 90-079. During the 1996-97 storm season, monitoring shall begin at the San Gabriel River and Los Angeles River (downstream of Wardlow Road) stations. The Principal Permittee shall monitor at the Ballona Creek and Malibu Creek monitoring stations during the 1995-1996 storm season up to ten station events per year including dry weather sampling. Thereafter, monitoring shall be reduced at all stations to a maximum of five events per year. Mass emission station monitoring frequency will be evaluated after the 1998-1999 storm season. However, regardless of the results, monitoring shall not exceed five storm events per station for the 1999-2000 storm season.
- b. Samples for mass emission station monitoring shall be taken with the same type of automatic sampler used under Order 90-079, as well as through grab sampling. The samplers shall be set to monitor storms from 0.25 inches of rainfall. The constituents to be analyzed for samples taken at mass emission stations are listed in Attachment C-3. The Principal Permittee may elect not to sample Volatile Organic Compounds from the list of constituents for mass emission stations.
- c. If a constituent is not detected at the method detection limit for its respective test method listed in Attachment C-3 in more than 25 percent of the first ten sampling events or on a rolling basis using the ten most recent sampling events, it will not be further analyzed unless the observed occurrences show high concentrations and are cause for concern.
- d. With the exception of the stations noted in (2)(a) above, monitoring at other mass emission stations installed under Order 90-079 shall be discontinued and the stations decommissioned.

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3. Critical Source/Best Management Practice Monitoring

The Principal Permittee shall conduct a program for monitoring critical sources to characterize sources of storm water pollutants and assess effectiveness of BMPs. The program shall be consistent with the following:

- a. Selection of Critical Sources: The Principal Permittee will select critical sources for monitoring based on the methodology described in Attachment C-4 (Critical Source/BMP Monitoring). A total of five (5) critical sources will be monitored over six rainy seasons commencing with the 1996-97 rainy season, subject to the provisions of (3)(d) below.
- b. Not later than September 1, 1996, the Principal Permittee shall submit a report to the Executive Officer for approval on the critical source selection process and recommend critical sources for evaluation. Upon approval of the report, the Principal Permittee shall proceed to conduct the activities set forth in (3)(c-f).
- c. Characterization of Critical Sources: Commencing with the 1996-97 rainy season, the Principal Permittee shall commence the characterization of critical sources. A total of six (6) examples of each critical source will be characterized through analysis of flow runoff. Fewer examples may be selected due to distance considerations and/or the unavailability of sufficient source locations willing to participate in the program. A total of at least five (5) storms will be used to characterize the critical source runoff. Samples will be analyzed for those pollutants anticipated to be found in the critical source storm water/non-storm water discharges and such analytes will be partitioned, as appropriate, to determine the dissolved and undissolved portions.
- d. Evaluation of BMPs: In the year after a critical source has been characterized, a BMP or BMPs appropriate to the critical source will be selected and installed at up to half of the critical source examples (the "test sites"). Flow from the remaining source examples (the "control sites") will continue to be analyzed. A total of ten (10) targeted storm events will be monitored to assess the effectiveness of the BMPs. If there are insufficient storm events during the year, the evaluation may be continued during the next storm season. The Principal Permittee's monitoring of critical sources and evaluation of BMPs will be concluded by the end of the sixth full rainy season after the adoption of this Order, provided that sufficient number of storms have occurred.
- e. Additional Evaluation: After the third full rainy season following the adoption of the Order, the Principal Permittee will reevaluate, using the same process described in Attachment C-4, the progress made by other public entities in the State to evaluate critical sources and BMPs. If after the evaluation, the Principal Permittee

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determines that there are either additional critical sources, or BMPs associated with identified significant critical sources which have not been monitored and/or evaluated, the Principal Permittee, subject to the approval of the Executive Officer, will undertake "Additional Monitoring". The Additional Monitoring will consist of monitoring up to an additional three (3) critical sources, or evaluate up to an additional three (3) BMP sets, or some combination thereof totalling three. The extent of Additional Monitoring will be dependent on the Principal Permittee's ability to complete the monitoring/evaluation described in (3)(c-d) above; if more time is needed to complete such monitoring, the extent of the Additional Monitoring shall be accordingly reduced.

4. **Loads Assessment Model**

The Principal Permittee shall, not later than 18 months after adoption of this Order, submit to the Executive Officer for approval a workplan for performing a loads assessment analysis for each of the six WMAs to determine pollutant loads entering the ocean from receiving waters in the county. The assessment shall be conducted following the third full rainy season after adoption of this Order using the collected monitoring data from the land use and mass emission stations (including data collected from stations monitored under Order No. 90-079) and employing the USEPA simplified model.

5. **Receiving Waters Study**

The Principal Permittee, in conjunction with other participants that it may choose, will fund a study of receiving waters impacted by storm water described in Attachment C-5, subject to revisions as set forth below in (5)(d). The purpose of the study will be to study the impacts, if any, of storm water/non-storm water discharges on the beneficial uses of Santa Monica Bay and to assist the Permittees in developing storm water management programs. The obligation of the Principal Permittee under this Order with respect to the receiving waters study shall consist of the following:

- a. **Plume Study:** The Principal Permittee will support a plume study to evaluate the dispersion, fate, and transport of storm water pollutants in Ballona Creek and Malibu Creek, through a contribution of up to a maximum of \$145,000.
- b. **Benthic Study:** The Principal Permittee will support a study to assess impacts of storm water on the marine benthic community near the mouths of Ballona Creek and Malibu Creek, through a contribution of up to a maximum of \$205,000. If it is the consensus of project scientists that a third year of benthic study is advisable to meet the goals of the receiving waters study, the Principal Permittee will contribute up to a maximum of an additional \$80,000 for the third year of study.

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- c. **Toxicity Study:** The Principal Permittee will support a study to evaluate sediment and water column toxicity in Ballona Creek and Malibu Creek through a contribution of up to a maximum of \$118,500. If it is the consensus of the project scientists that a third year of toxicity studies is advisable to meet the goals of the receiving waters study, the Principal Permittee will contribute up to a maximum of \$80,500 to fund a third year of study.
- d. **River Study:** The Principal Permittee will take a total of three (two storm weather and one dry weather) water samples at each of the Los Angeles and San Gabriel River mass emission stations during the 1997-98 and 1998-99 seasons. The samples will be subjected to sea urchin fertilization bioassays to evaluate water column toxicity, with the Principal Permittee's out-of-pocket expenses for the study not to exceed \$3,600.
- e. **Project Design:** The receiving waters study shall initially contain the elements set forth in Attachment C-5. However, the scientists conducting the receiving waters study may alter the parameters of the second and (if necessary) the third year of the receiving waters study so as to meet the objectives of the study. Such alterations may include changing of sampling locations, use of different sampling techniques, or other pertinent redirection of resources. The Principal Permittee shall notify the Executive Officer of any revisions to the second and (if necessary) third years of the receiving waters study for review and approval.
- f. **Study Reports:** The Principal Permittee shall require the project scientists conducting the study to prepare an annual report covering study activities of the previous year, and any interim/final assessments. Such reports shall be submitted by the Principal Permittee to the Executive Officer with the Annual Monitoring Report.
- g. **Principal Permittee Responsibilities:** The commitments of the Principal Permittee toward performance of a receiving waters study are: providing funding, and submittal of progress and final reports.

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ATTACHMENT C-1

LAND USE SITE SELECTION PROCESS OUTLINE

Step 1

The Principal Permittee will take the Southern California Association of Governments ("SCAG") categories listed below as an initial list of land use categories. The Principal Permittee will use its best efforts to obtain overlays (or similar information) for use in the land use selection process. However, these overlays or information must be usable County-wide in the SCAG database and the Principal Permittee shall not be required to look for or use overlays or information which cannot be so used. The Principal Permittee also shall not be required to create overlays. Some of these categories may not be important (very small area represented in study area, and/or known very low EMC or runoff mass). The initial number of categories will be reduced at this step.

For each remaining category, the Principal Permittee will identify eight (8) representative locations. The eight (8) locations in each category would be relatively small areas, such as a square block for residential areas, a single school or church, a few blocks of strip commercial, etc. These sites would be selected, where possible, over a wide geographical area of the study area to include a range of topographical characteristics such as distance from ocean, etc.

Step 2

In this step, the Principal Permittee should perform a site survey of ground conditions. For each of the eight (8) locations identified for each category, the Principal Permittee should collect information, to the extent such information is available, including: type of roof connections, type of drainage, age of development, housing density, type of landscaping, condition of pavement, soils, and existing storm water control practices.

These are simple field surveys that can be completed by a team of two people at the rate of about 5-6 (maximum) locations a day, depending on navigation problems, traffic delays, and the proximity of the sites. Several photographs should be made of each site and archived with the field sheets for future reference.

Step 3

In this step, currently available and usable aerial photographs taken in the past five years are used to measure the percent impervious area associated with rooftops, streets, driveways, sidewalks, parking areas, storage areas, decks and sheds, swimming pools, alleyways, and other paved areas. Photographic prints for each of the homogeneous neighborhoods examined on the ground in step 2 are needed. The actual measurements require about an hour per site.

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Step 4

In this step, the Principal Permittee would compile the information collected in the previous steps and use it to determine which land use categories should be monitored. This refinement step would result in a final list of categories to be examined, based on the actual measured values.

Some of the sites selected for field measurement may actually belong in another category and would be reassigned to that category before the data were evaluated. In addition, development characteristics and areas of important elements may indicate greater variability within an initial category than between other categories in the same land use. If there is no other reason to suspect differences that would affect drainage quality or quantity, these areas could be combined to reduce the total number of individual land use categories used in subsequent evaluations.

On the basis of Step 2 and Step 3, the Principal Permittee will measure the percent of directly connected impervious area for each of the eight neighborhoods surveyed. The Principal Permittee will then compare the percent of impervious area using simple non-parametric statistics to see how differences within a single land use category compare with differences between land use categories. Based on this analysis, the Principal Permittee will aggregate or subdivide land use categories as appropriate. Subdivisions of land use categories shall correspond to those in the SCAG database.

Step 5

Next, the Principal Permittee will rank the selected land use categories according to their predominance and pollutant generation. As part of its analysis, the Principal Permittee would perform a marginal cost/benefit analysis as to which land use categories should be monitored.

For each land use category the following will be estimated based on existing data: drainage area, runoff quantity and an EMC value for each of four indicator pollutants (preliminarily, copper, pyrene, total suspended solids and diazinon). The product of runoff quantity and EMC is the estimated total annual pollutant loading associated with each land use category and indicator pollutant. These sums are then ranked, from the largest to the lowest, and an accumulated percentage contribution is then produced for each pollutant. These accumulated percentage values are plotted against the number of land use categories. The graph will be relatively steep initially and then level off as it approaches 100%. A marginal cost-benefit analysis can then be used to select the number of land uses that should be monitored, which will take into account all four of the indicator pollutants.

The list of County-wide land use categories to be evaluated in Step 5 will be reviewed for each of the six watersheds in the Permit area. If there is a land use category in an individual watershed which may be feasibly monitored and is in the top five land uses in terms of total area in the watershed and is otherwise an important contributor of constituents of concern, but which would not be monitored based on the County-wide marginal cost-benefit analysis, up to two such land uses shall be monitored after the first year of the monitoring program, subject to the station event cap.

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Step 6

The Principal Permittee will take the top ranked land uses and if the total number of categories exceed ten, select ten monitoring sites for monitoring the first year. All of the remaining top-ranked land uses will need to be monitored in future years, subject to the station event cap. In selecting those sites for initial monitoring, the Principal Permittee should look for homogeneous areas that are self-contained in a drainage area. In addition, monitoring locations will need to be selected along storm drains that are able to accommodate the sampling equipment, have sampling access, no safety problems, etc.

Step 7

Next, the monitoring stations are installed. The monitoring equipment will include automatic water samplers and, if surcharging flow problems are anticipated, flow sensors measuring velocity and depth of flow. The samples collected at the automatic samplers should all be flow-weighted composites, requiring only one sample to be analyzed per event at each monitoring station. Each sampler site will need to be visited periodically to ensure that everything is ready to sample.

Step 8

The Principal Permittee should continue down the list of priority land use categories and install additional monitoring stations in subsequent years. At some point, the marginal benefit from monitoring an additional land use category will not be sufficient to justify the cost, as determined from the marginal cost-benefit analysis in step 5, and no additional sites will need to be installed. The land use sampling program will end when sufficient storms have been sampled to obtain the desired error level in the EMC values for the constituents of concern.

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ATTACHMENT C-2

SCAG LAND USE CLASSIFICATIONS

Single Family Residential  
High Density  
Low Density

Rural Residential  
Retail Stores and Commercial Services  
Other Commercial  
Special Use Facilities  
Military Installations  
Heavy Industrial  
(Mineral) Extraction  
Transportation  
Utility Facilities

Mixed Transportation  
Mixed Commercial and Industrial  
Under Construction  
Local Parks and Recreation  
Cemeteries  
Specimen Gardens and Arboreta  
Other Open Space and Recreation  
Irrigated Cropland and Improved Pasture Land  
Non-Irrigated Cropland and Improved Pasture Land  
Orchards and Vineyards  
Dairy and Intensive Livestock, and Associated Facilities  
Poultry Operations  
Horse Ranches  
Abandoned Orchards and Vineyards  
Vacant with Limited Improvements

Mobile Homes and Trailer Parks  
Multi-Family Residential  
Mixed Residential  
General Office Use

Public Facilities  
Educational Institutions  
Light Industrial

Wholesaling and Warehousing  
Communication Facilities  
Maintenance Yards

Mixed Transportation and Utility  
Mixed Urban  
Golf Courses  
Regional Parks and Recreation  
Wildlife Preserves and Sanctuaries  
Beach Parks  
Urban Vacant

Nurseries

Other Agriculture  
Vacant Undifferentiated

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ATTACHMENT C-3

LIST OF CONSTITUENTS IN MONITORING PROGRAM  
 AND ASSOCIATED DETECTION LIMITS

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CONSTITUENTS	USEPA METHOD	DETECTION LIMIT
<b>Conventional Pollutants</b>		
Oil and Grease	413.2	1 ppm
Total Phenols	420.1	0.1 ppm
Cyanide	335.2	0.01 ppm
pH	150.1	0 - 14
Temperature		None
Dissolved Oxygen	—	Sensitivity to 5 mg/L
<b>Bacteria</b>		
Total Coliform	9221B	<20mpn/100ml
Fecal Coliform	9221B*	<20mpn/100ml
Fecal Streptococcus	9221B*	<20mpn/100ml
<b>General</b>		
Dissolved Phosphorus	300	0.05ppm
Total Phosphorus	300	0.05ppm
Turbidity	180.1	0.1NTU
Total Suspended Solids	160.2	2ppm
Total Dissolved Solids	160.1	2ppm
Volatile Suspended Solids	160.4	2ppm
Total Organic Carbon	415.1	1ppm
Total Petroleum Hydrocarbon	418.1	1ppm
Biochemical Oxygen Demand	405.1	2ppm
Chemical Oxygen Demand	410.4	20-900ppm
Total Ammonia-Nitrogen	350.2	0.1ppm
Total Kjeldahl Nitrogen	351.2	0.1ppm
Nitrate-Nitrite	4110*	0.1ppm
Alkalinity	310.1	2ppm
Specific Conductance	120.1	1umho/cm
Total Hardness	130.2	2ppm
MBAS	425.1	<0.5 mg/L
Chloride	4110	2ppm
Fluoride	4110	0.1ppm
Sulfate	4110*	2ppm

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CONSTITUENTS	USEPA METHOD	DETECTION LIMIT
<b>Metals (Total and Soluble)</b>		
Aluminum	202.1	100mg/l
Antimony	204.2	10ppb
Arsenic	208.2	10ppb
Barium	208.2	100ppb
Beryllium	210.2	5ppb
Boron	212.3	250ppb
Cadmium	213.2	10ppb
Calcium	215.2	200ppb
Chromium	218.2	10ppb
Copper	219.2	10ppb
Hex. Chromium	7196	<10mg/L
Iron	236.2	100ppb
Lead	239.2	10ppb
Magnesium	242.1	200ppb
Manganese	243.2	30ppb
Mercury	245.1	1ppb
Nickel	249.2	10ppb
Potassium	258.1	1ppm
Selenium	270.2	5ppb
Silver	272.2	10ppb
Sodium	273.1	5ppb
Thallium	279.2	10ppb
Zinc	289.2	50ppb
<b>Semivolatile Organic Compounds</b>		
<b>Acids</b>	<b>8250</b>	<b>(µg/l)</b>
Benzoic Acid	8250	6
Benzyl Alcohol	8250	6
2-Chlorophenol	8250	6
2, 4-Dichlorophenol	8250	6
2, 6-Dichlorophenol	8250	6
4-Dimethylphenol	8250	6
4, 6-Dinitro-2-methylphenol	8250	6
2,4-Dinitrophenol	8250	6
2-Methylphenol	8250	6
4-Methylphenol	8250	6
2-Nitrophenol	8250	6
4-Nitrophenol	8250	6
4-Chloro-3-methylphenol	8250	6
Pentachlorophenol	8250	6
Phenol	8250	6

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<u>CONSTITUENTS</u>	<u>USEPA METHOD</u>	<u>DETECTION LIMIT</u>
Acids (continued)	8250	
2,3,4,6-Tetrachlorophenol	8250	△
2,4,5-Trichlorophenol	8250	△
2,4,6-Trichlorophenol	8250	△
Basic/Neutral	8250	
Acenaphthene	8250	△△.5
Acenaphthylene	8250	△△.5
Acetophenone	8250	△△.5
Aniline	8250	△△.5
Anthracene	8250	△△.5
4-Aminobiphenyl	8250	△△.5
Benzidine	8250	△△.5
Benzo(a)anthracene	8250	△△.5
4-Chloroaniline	8250	△△.5
1-Chloronaphthalene	8250	△△.5
p-Dimethylaminoazobenzene	8250	△△.5
7,12-Dimethylbenz(a)-anthracene	8250	△△.5
o,o-Dimethylphenethylamine	8250	△△.5
Benzo(a)pyrene	8250	△△.5
Benzo(b)fluoranthene	8250	△△.5
Benzo(k)fluoranthene	8250	△△.5
Chlordane	8250	△△.5
Bis(2-chloroethoxy)methane	8250	△△.5
Bis(2-chlorisopropyl)ether	8250	△△.5
Bis(2-chloroethyl)ether	8250	△△.5
Bis(2-ethylhexyl)phthalate	8250	△△.5
4-Bromophenyl phenyl ether	8250	△△.5
Butyl benzyl phthalate	8250	△△.5
2-Chloronaphthalene	8250	△△.5
4-Chlorophenyl phenyl ether	8250	△△.5
Chrysene	8250	△△.5
Dibenz(a,j)acridine	8250	△△.5
Dibenz(a,h)anthracene	8250	△△.5
1, 3-Dichlorobenzene	8250	△△.5
1, 4-Dichlorobenzene	8250	△△.5
1, 2-Dichlorobenzene	8250	△△.5
3, 3-Dichlorobenzidine	8250	△△.5
Diethylphthalate	8250	△△.5
Dimethylphthalate	8250	△△.5
Di-n-butylphthalate	8250	△△.5
2,4-Dinitrotoluene	8250	△△.5
2, 6-Dinitrotoluene	8250	△△.5

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CONSTITUENTS	USEPA METHOD	DETECTION LIMIT
Base/Neutral (continued)	8250	
Diphenylamine	8250	△
1, 2-Diphenylhydrazine	8250	△
Di-n-octylphthalate	8250	△
Ethyl methanesulfonate	8250	△
Fluoranthene	8250	△
Fluorene	8250	△
Hexachlorobenzene	8250	△
Hexachlorobutadiene	8250	△
Hexachlorocyclopentadiene	8250	△
Hexachloroethane	8250	△
Indeno(1, 2, 3-cd)pyrene	8250	△
Isophorone	8250	△
3-Methylcholanthrene	8250	△
Methyl methanesulfonate	8250	△
Naphthalene	8250	△
1-Naphthylamine	8250	△
2-Naphthylamine	8250	△
2-Nitroaniline	8250	△
3-Nitroaniline	8250	△
4-Nitroaniline	8250	△
Nitrobenzene	8250	△
N-Nitroso-di-n-butylamine	8250	△
N-Nitrosodimethylamine	8250	△
N-Nitrosodiphenylamine	8250	△
N-Nitroso-di-N-propylamine	8250	△
N-Nitrosopiperidine	8250	△
Pentachlorobenzene	8250	△
Phenacitin	8250	△
Phenanthrene	8250	△
2-Picoline	8250	△
Pronamide	8250	△
Pyrene	8250	△
5-Tetrachlorobenzene	8250	△
1, 2, 4,-Trichlorobenzene	8250	△
Pesticides	608	
Aldrin	608	0.05
alpha-BHC	608	0.05
beta-BHC	608	0.05
delta-BHC	608	0.05
gamma-BHC (Lindane)	608	0.05
Carbofuran	531.1	0.05

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<u>CONSTITUENTS</u>	<u>USEPA METHOD</u>	<u>DETECTION LIMIT</u>
Pesticides (continued)	8250	(µg/l)
Chlordane	608	0.05
4, 4'-DDD	608	<0.1
4, 4'-DDE	608	<0.1
4, 4'-DDT	608	<0.1
Benzaton	515.1	<2
Dieldrin	608	<0.1
Endosulfan I	608	<0.1
Endosulfan II	608	<0.1
Endosulfan sulfate	608	<0.1
Endrin	608	<0.1
Endrin aldehyde	608	<0.1
Glyphosate	547	<.5
Heptachlor	608	0.05
Heptachlor epoxide	608	0.05
Methoxychlor	608	<0.5
Toxaphene	608	<1.0
2,4-D	515.1	<.02
2,4,5-TP-SILVEX	515.1	<.2
Polychlorinated Biphenyls	608	(µg/l)
Aroclor-1016	608	<1
Aroclor-1221	608	<1
Aroclor-1232	608	<1
Aroclor-1242	608	<1
Aroclor-1248	608	<1
Aroclor-1254	608	<1
Aroclor-1260	608	<1
Herbicides		
Diazinon		
Chlorpyrifos		
Diuron		
Malathion		
Prometryn	507	
Atrazine	507	
Simazine	507	<2 mg/l
Cyanazine	507	
Molinate	507	<.01 mg/l
Thiobencarb	507	<.1 mg/l

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<u>CONSTITUENTS</u>	<u>USEPA METHOD</u>	<u>DETECTION LIMIT</u>
Volatile Organic Compounds (VOCs)	8240A	
Acetonitrile	8240A	10.0
Acrolein	8240A	10.0
Acrylonitrile	8240A	0.5
Benzene	8240A	0.5
Bromoform	8240A	0.5
2-Butanone	8240A	10.0
Carbon Disulfide	8240A	10.0
Carbon Tetrachloride	8240A	0.5
Chlorobenzene	8240A	0.5
Chlorodibromomethane	8240A	0.5
Chloroethane	8240A	0.5
2-Chloroethyl vinyl ether	8240A	1.0
Chloroform	8240A	0.5
Dibromomethane	8240A	0.5
1,2-Dibromo-3Chloropropane	8240A	<.01
1, 4-Dichloro-2-butene	8240A	10.0
Dichlorobromomethane	8240A	0.5
Dichlorodifluoromethane	8240A	0.5
1, 1-Dichloroethane	8240A	0.5
1, 2-Dichloroethane	8240A	0.5
1, 1-Dichloroethene	8240A	0.5
trans-1, 2-Dichloroethene	8240A	0.5
1, 2-Dichloropropane	8240A	0.5
cis-1, 3-Dichloropropane	840A	0.5
trans-1, 3-Dichloropropane	8240A	0.5
Ethanol	8240A	10.0
Ethylbenzene	8240A	1.0
Ethylene Dibromide	8240A	<.01
Ethylene Oxide	8240A	10.0
Ethyl Metcrylate	8240A	0.5
2-Hexanone	8240A	5.0
Iodomethane	8240A	0.5
Methyl Bromide	8240A	5.0
Methyl Chloride	8240A	5.0
Methylene Chloride	8240A	1.0
4-Methyl-2-pentanone	8240A	5.0
Styrene	8240A	0.5
1, 1, 2,2-Tetrachloroethane	8240A	0.5
Tetrachloroethane	8240	0.5
Toluene	8240A	1.0
Trichlorofluoromethane	8240A	1.0
1, 2,3-Trichloropropane	8240A	0.5
Trichloroethene	8240A	0.5

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<u>CONSTITUENTS</u>	<u>USEPA METHOD</u>	<u>DETECTION LIMIT</u>
VOCs (continued)	8240A	
1, 1, 1-Trichloroethane	8240A	1.0
1, 1,2-Trichloroethane	8240A	1.0
1,1,2-Trichloro- 1,2,2 trifluoroethane	8240A	<.5
Vinyl acetate	8240A	5.0
Vinyl chloride	8240A	0.5
Xylene (Total)	8240A	0.5

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ATTACHMENT C-4  
CRITICAL SOURCE/ BMP MONITORING

**Selection of Initial Critical Sources to be Studied:** The selection of initial critical sources will be made using the following steps:

**Step 1:** The Principal Permittee first will develop an initial list of candidate critical sources, including industrial and commercial sources that are regulated under the state's General Permit and those which are not.

**Step 2:** The Principal Permittee next will develop a list of criteria for prioritizing the candidate critical sources developed pursuant to Step 1, including the following: number and/or total area associated with each critical source; runoff pollutants associated with each source; the impact of non stormwater discharges associated with each source; whether or not the source is regulated under the General Permit; and, ease of implementation of monitoring and BMPs.

**Step 3:** The Principal Permittee next will prioritize the candidate critical sources based on the selection criteria develop under Step 2.

**Step 4:** The Principal Permittee next will conduct a literature review and contact other state municipal stormwater programs to identify what critical sources have been (or are planned in the next five years) to be studied elsewhere. Where studies have been conducted or are planned to be conducted elsewhere, such studies will be reviewed to assess whether the hydrologic conditions in the study area are representative of those in Los Angeles County, the quality of the study, and any conclusions from studies already conducted. This evaluation will be coordinated with the State Stormwater Quality Task Force.

**Step 5:** The Principal Permittee next will take the list developed up to Step 3 and refine and finalize it based upon the review conducted pursuant to Step 4.

**Selection of Additional Critical Sources/BMPs:** The selection of additional critical sources or BMPs for monitoring following the third rainy season from the adoption of this Order will follow the steps noted above, except that BMPs be evaluated in addition to critical sources.

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ATTACHMENT C-5

RECEIVING WATERS STUDY

A receiving waters study will be a joint effort among the University of Southern California, the University of California at Santa Barbara and the Southern California Coastal Water Research Project ("SCCWRP"). In addition, the study will be done in cooperation with an ongoing toxicity study by investigators at UCLA. Co-funding, either direct or in terms of vessel support, will be provided by the federal government through the Sea Grant program, and by the City of Los Angeles through SCCWRP. It must be noted that while the Principal Permittee is committed to funding a receiving waters study, the scope of that study will be affected by the availability of non-Principal Permittee funding sources, as discussed below. The Principal Permittee's commitment is limited to the provision of funds.

A. **Outline of Study:** The receiving waters study includes a plume study to determine the dispersion of stormwater runoff and associated sediment, a study of the benthic environment near two principal storm drains, Malibu and Ballona Creeks, and an assessment of the toxicity of storm drain waters and affected sediments near Malibu and Ballona Creeks. The plume study will be carried out by the USC Sea Grant program. The benthic and toxicity studies will be carried out by SCCWRP. All of these studies will be carried out over two storm seasons, with the third year used for analysis of the data obtained in the previous years. If it is the consensus of the project scientists that a third year of research is appropriate for the benthic and toxicity studies, such study shall be carried out. Each element of these studies is outlined below.

1. **Plume Study:** The plume study will be conducted over two storm seasons to, at a minimum, accomplish the following:
  - Map the spatial and temporal structure of the runoff plumes from Ballona and Malibu Creeks as they flow into Santa Monica Bay following strong winter storms.
  - Examine the interaction between the runoff plume and ocean processes as they affect the advection, dispersion, and mixing of the plume.
  - Evaluate the impact of storm runoff plumes on beneficial uses of the coastal ocean.
  - Characterize the optical properties of the suspended particulate material ("SPM") and dissolved organic material ("DOM") associated with runoff sources.
  - Examine the effects of DOM and SPM on the water column optics and the distribution of nutrient concentrations, as the same may affect phytoplankton productivity.
  - Assist in establishing appropriate locations for benthic study stations.

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2. **Benthic Study:** The benthic study will measure the following parameters:
- Water quality (dissolved oxygen, salinity, density, temperature, light transmissivity and pH).
  - Sediment grain size, sediment organic concentrations and sediment contaminant concentrations.
  - The structure of the benthic invertebrate community.

The benthic study will employ the same methods used in studies of dry weather impacts in river discharge areas carried out by SCCWRP in 1994 and 1995 in the entire Southern California Bight.

3. **Toxicity Study:** The toxicity study will involve the following proposed annual elements:

**Water Column Toxicity**

- 30 sea urchin fertilization bioassays taken during two storm and one dry weather event off each of Ballona and Malibu Creeks (including reference sites).
- 3 Phase I TIE tests on up to 3 samples showing toxicity in the sea urchin fertilization bioassays

**Sediment Toxicity**

- Amphipod survival bioassays of sediment samples from 10 stations (including reference sites) will be taken 2 times (1 storm and 1 dry weather period) in Year 1.
- Amphipod survival bioassays of sediment samples from 10 stations (including reference sites) will be taken 2 times (1 storm and 1 dry weather period) in Year 2.
- Sea urchin growth bioassays will be conducted for chronic toxicity in sediment samples from 6 stations, plus 1 reference site, with the locations to be determined by project scientists based on existing data and best scientific judgment. Biological effects only (survival, growth, sediment avoidance) will be measured for all sites in Year 2.
- Chemical analysis of sea urchin growth test tissue samples (gonad) will be conducted for organics and metals. Duplicate samples from 4 stations (including one reference) will be analyzed in Year 2.

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- Phase I TIE tests using sea urchin fertilization of interstitial water from up to 4 stations identified to be toxic in amphipod survival bioassays (4 samples total) will be conducted in Year 2.
  - Additional interstitial water testing intended to coordinate with the UCLA study noted below may also be carried out.
- B. **Project Flexibility:** The exact parameters of Year 2 (and Year 3, if necessary) testing will be determined through a review by the project scientists of the results of Year 1 and Year 2 testing. Thus, the steps outlined above may be modified following the reviews.
- C. **Coordination with UCLA Toxicity Study:** UCLA researchers are involved in an ongoing Santa Monica Bay Restoration Project study of the toxicity of stormwater runoff in Ballona and Malibu Creeks. The receiving waters study shall be coordinated, to the extent possible, with the UCLA study to maximize the utility of information obtained by both studies.
- D. **Los Angeles and San Gabriel River Study:** In addition, the Principal Permittee will take a total of three (two storm weather and one dry weather) water samples taken at each of the Los Angeles and San Gabriel River mass emission stations during each of the two years that those stations are monitored. The samples will be analyzed using the sea urchin fertilization bioassay, with the bioassay costs not to exceed \$3,600.

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ATTACHMENT D  
GLOSSARY OF TERMS

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**40 CFR:** Title 40 of the Code of Federal Regulations, which is the codification of the general and permanent rules pertaining to protection of the environment published in the Federal Register by the executive departments and agencies of the federal government.

**Authorized Discharge:** Any discharge that is authorized pursuant to an NPDES permit or meets the conditions set forth in this Order.

**Basin Plan:** Refers to the *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*, adopted by the Regional Board on June 13, 1994, and subsequent amendments.

**Beneficial Uses:** Existing or potential uses of receiving waters in the permit area as designated by the Regional Board in the Basin Plan.

**BAT/BCT Criteria:** Treatment-based standards for reducing the discharge of pollutants, as defined in 40 CFR subchapter N, for specific categories of industrial facilities subject to storm water effluent limitations guidelines, new source performance standards, or toxic pollutant effluent standards. Effluent limitations have been defined in 40 CFR for the reduction of toxic pollutants using Best Available Technology Economically Achievable (BAT) and for the reduction of conventional pollutants using Best Conventional Pollutant Control Technology (BCT).

**BMP:** See Best Management Practice

**Best Management Practice (BMP):** Activities, practices, facilities, and/or procedures that when implemented to their maximum efficiency will prevent or reduce pollutants in discharges. Examples of BMPs may include public education and outreach, proper planning of development projects, proper clean out of catch basin inlets, and proper sludge or waste handling and disposal.

**Bioaccumulate:** The build up of a substance in the tissues of an organism to a higher concentration than in the surrounding environment, generally as a result of the organism's ingestion and internal storage of the substance over time.

**Biostimulatory:** An agent, action, or condition that arouses, elicits or accelerates physiological or organic activity. For example, the introduction of excessive nutrients to an aquatic system has a biostimulatory effect which manifests itself as excessive growth of algae in the aquatic systems. As the algae decomposes, dissolved oxygen in the water column is depleted, potentially leading to excessively low dissolved oxygen levels which can lead to suffocation of aquatic life, i.e., fish kills.

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CFR: See Code of Federal Regulations.

CRWQCB: This means the California Regional Water Quality Control Board, Los Angeles Region. See also Regional Board.

CSWMP: See Countywide Storm Water Management Plan

California Storm Water Best Management Practice Handbooks: The technical manuals prepared under direction of the Storm Water Quality Task Force, representing California members of the American Public Works Association (APWA). Comprising three volumes—Municipal, Industrial, and Construction—they provide guidance for selecting BMPs to reduce pollutants in storm water discharges. These manuals are currently available from Blue Print Service, 1700 Jefferson Street, Oakland, CA 94612, (510) 444-6771 or Fax (510) 444-1262.

Clean Water Act (CWA): The Federal Water Pollution Control Act enacted in 1972 by Public Law 92-500 and amended by the Water Quality Act of 1987. The Clean Water Act prohibits the discharge of pollutants to Waters of the United States unless said discharge is in accordance with an NPDES permit. The 1987 amendments include guidelines for regulating municipal, industrial, and construction storm water discharges under the NPDES program.

Code of Federal Regulations: A codification of the general and permanent rules published in the Federal Register by the Executive departments and agencies of the Federal Government.

Construction Activity: Clearing, grading, or excavation that results in soil disturbance. Construction activity does not include routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of the facility, nor does it include emergency construction activities required to immediately protect public health and safety.

Control: When used in the context of legal authority, "Control" means to legally, contractually, or by other similar means, minimize or eliminate an activity or activities or the result(s) of the activity or activities.

Countywide Storm Water Management Plan (CSWMP): A single comprehensive plan for implementation of the requirements of this Order that are applicable to all Permittees and all Watershed Management Areas. The CSWMP is a storm water management implementation plan for the entire drainage area within the jurisdiction of the Permittees under this Order. The Countywide Storm Water Management Plan will be developed as a single document by the Principal Permittee, with assistance and participation from the Permittees, according to the schedule prescribed in the permit. The CSWMP shall be used as a tool to develop a watershed specific Watershed Management Area Plan (WMAP).

Dechlorinated Swimming Pool Discharges: This means clean and swimmable swimming pool water. For proper discharge, swimming pool discharges shall have no measurable chlorine and not contain any detergents, wastes, or additional chemicals not typically found in swimming pool water. The term swimming pool discharges does not include swimming pool filter backwash.

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**Development:** The placement or erection of any solid material or structure on land, in or under water, or grading, removing, dredging, mining or extraction of any materials; change in the density or intensity of use of land including, but not limited to, subdivisions pursuant to the Subdivision Map Act Government Code §66410 et seq.), any other division of land, including lot splits; construction, reconstruction, demolition or alteration of the size of any structure.

**Discharge:** Any release, spill, leak, pump, flow, escape, dumping, or disposal of any liquid, semi-solid or solid substance.

**Disturbed Area:** In the context of construction activities, "disturbed area" means that area altered as a result of clearing, grading, and/or excavation of earth.

**Do-it-yourselfers:** Means any person or persons who repair or maintain their own vehicle(s) and/or home(s).

**Effectively Prohibit:** This is a term used in the context of legal authority and essentially means that a Permittee, individually or jointly, must have or acquire the adequate legal authority to prohibit an action or actions.

**Effectiveness:** A measure or indicator of how well a program, plan, or best management practice achieves its intended purpose. Measures or indicators of effectiveness include, but are not limited to, detailed accounting of program accomplishments, funds expended, staff hours utilized, amount of pollutants reduced, and results of quantitative monitoring.

**Erosion:** The wearing away of land surface primarily by wind or water. Erosion occurs naturally as a result of weather or runoff but can be intensified by clearing, grading, or excavation of the land surface.

**Executive Advisory Committee (EAC):** A committee composed of representatives of the County of Los Angeles, the City of Los Angeles, and representatives from the six Watershed Management Areas.

**Executive Officer:** The Executive Officer of the California Regional Water Quality Control Board, Los Angeles Region, or an authorized representative.

**GCASP:** See General Construction Activity Storm Water Discharge Permit.

**GIASP:** See General Industrial Activity Storm Water Discharge Permit.

**General Construction Activity Storm Water Discharge Permit (GCASP).** This is a NPDES permit adopted by the State Water Resources Control Board which authorizes the discharge of storm water under certain conditions.

**General Industrial Activity Storm Water Discharge Permit (GIASP).** This is a NPDES permit adopted by the State Water Resources Control Board which authorizes the discharge of storm water under certain conditions.

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**Good Housekeeping Practice:** A common practice related to the storage, use, or cleanup of materials, performed in a manner that minimizes the discharge of pollutants. Examples include purchasing only the quantity of materials to be used at a given time, use of alternative and less harmful products, cleaning up spills and leaks, and storing materials in a manner that will contain any leaks or spills.

**Hazardous Material:** Any material defined as hazardous by Chapter 6.95 of the California Health and Safety Code. This includes any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.

**Hazardous Substance:** Any substance designated pursuant to 40 CFR 302. This also includes unlisted hazardous substances which is a solid waste, as defined in 40 CFR 261.2, which is not excluded from regulation as a hazardous waste under 40 CFR 261.4(b), is a hazardous substance under section 101(14) of the CWA if it exhibits any of the characteristics identified in 40 CFR 261.20 through 261.24.

Examples of hazardous substances include any substance or chemical product for which one or more of the following applies:

- A material safety data sheet (MSDS) is required
- The substance is listed as radioactive by the Nuclear Regulatory Commission
- The substance is listed as hazardous by the U.S. Department of Transportation
- The material is listed in Labor Code §6382(b).

**IPM:** See Integrated Pest Management.

**Illicit Connection:** Any man-made conveyance that is connected to the storm drain system without a permit, excluding roof-drains and other similar type connections. Examples include channels, pipelines, conduits, inlets, or outlets that are connected directly to the storm drain system.

**Illicit Discharge:** Any discharge to the storm drain system that is prohibited under local, state or federal statutes, ordinances, codes or regulations. This includes all non-storm water discharges except discharges pursuant to an NPDES permit and discharges that are exempted or conditionally exempted in accordance with Section II of this Order.

**Illicit Disposal:** Any disposal, either intentionally or unintentionally, of material(s) or waste(s) that can pollute storm water or urban runoff.

**Impact:** Any actual or potential impelling or compelling negative effect caused either directly or indirectly by the discharge of pollutants to the municipal storm drain system.

**Impervious Surface:** Man-made or modified surface that prevents or significantly reduces the entry of water into the underlying soil, resulting in runoff from the surface in greater quantities and/or at an increased rate when compared to natural conditions prior to development. Examples of places that commonly exhibit impervious surfaces include parking lots, driveways, roadways, storage areas, and

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rooftops. The imperviousness of these areas commonly results from paving, compacted gravel, compacted earth, and oiled earth.

**Industrial Activity:** The term "industrial activity" is defined in 40 CFR 122.26(b)(14) and refers to 11 categories of activities required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with "industrial activity" as required by 40 CFR 122.26(c). See Phase I Facilities.

**Industrial/Commercial Facility:** Any facility involved and/or used in the production, manufacture, storage, transportation, distribution, exchange or sale of goods and/or commodities, and any facility involved and/or used in providing professional and non-professional services. This category of facility includes, but is not limited to, any facility defined by the Standard Industrial Classifications (SIC). Facility ownership (federal, state, municipal, private) and profit motive of the facility are not factors in this definition.

**Integrated Pest Management (IPM):** A philosophy of pest management that considers the whole ecosystem when determining the pest control strategies. This philosophy emphasizes use of a hierarchy of controls, with a preference for mechanical controls (e.g., mowing) and biological controls (e.g., beneficial insects, pheromones) before chemical controls (e.g., pesticides).

**Jurisdiction:** The term "jurisdiction", when used in connection with a Permittee, means the geographic area within the Permittee's boundaries that are required under this Order to be under the Permittee's regulatory control. The term is not intended to include facilities which the Permittee is preempted or otherwise precluded from regulating, such as federal and state facilities, school districts, and similar governmental (non-municipally owned or operated) entities.

**Legal Authority:** The ability of a Permittee to impose and enforce statutes, ordinances, and regulations to require control of pollutant sources and regulate the discharge of pollutants to the storm drain system, and to enter into interagency agreements, contracts, and memorandums of understanding. These powers are granted to the Permittees by the Constitution of the State of California and the General Laws of the State (for General Law Cities/Counties) or individual constitutions (for Charter Cities/Counties). These powers are promulgated by the Permittee through their municipal codes, ordinances, and statutes duly adopted by their governing body.

**MS4:** See Municipal Separate Storm Sewer System

**Maximum Extent Practicable (MEP):** The term which is the standard for implementation of storm water management programs, taken as a whole, to reduce pollutants in discharges to the maximum extent practicable. It is the maximum extent possible taking into account equitable consideration and competing facts, including, but not limited to: the gravity of the problem, public health risk, societal concern, environmental benefits, pollutant removal effectiveness, regulatory compliance, public acceptance, implementability, cost and technical feasibility. MEP refers to storm water management programs as a whole and not for individual BMPs. (Section 402(p)(3)(B)(iii) of the Clean Water Act requires that municipal permits "...shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques and system, design and engineering methods, and

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Los Angeles County Municipal Storm Water Permit  
Order No. 96-XXX

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such other provisions as the Administrator or the State determines appropriate for the control of such pollutants.)

**Municipal Separate Storm Sewer System (MS4):** See Storm Drain System.

**NPDES:** See National Pollutant Discharge Elimination System

**National Pollutant Discharge Elimination System:** A permit issued by the USEPA, SWRCB, or CRWQCB pursuant to the Clean Water Act that authorizes discharges to waters of the United States and requires the reduction of pollutants in the discharge.

**Non-Storm Water Discharge:** Any discharge to a municipal storm drain system that is not composed entirely of storm water.

**Notice of Intent to Meet and Confer (NIMC):** The NIMC is a letter sent to a Permittee or Permittees by the Regional Board Executive Officer as an invitation to discuss the implementation of requirements under this Order and is made when it is suspected that a Permittee or Permittees has/have an insufficient program based upon submittals made under this Order. The NIMC is a part of the Administrative Review section of this Order and provides an opportunity for the Permittee(s) to meet with Regional Board staff to clarify any potential misunderstandings prior to, or in lieu of the Regional Board taking enforcement action for "non-compliance".

**Nuisance:** Anything which meets all of the following requirements: (1) is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property; (2) affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal; (3) occurs during, or as a result of, the treatment or disposal of wastes.

**Permittee(s):** Any agency named in the NPDES storm water permit as being responsible for permit conditions within its jurisdiction. Permittees to the NPDES storm water permit presently include the County of Los Angeles and the cities of Agoura Hills, Alhambra, Arcadia, Artesia, Azusa, Baldwin Park, Bell, Bellflower, Bell Gardens, Beverly Hills, Bradbury, Burbank, Calabasas, Carson, Cerritos, Claremont, Commerce, Compton, Covina, Cudahy, Culver City, Diamond Bar, Downey, Duarte, El Monte, El Segundo, Gardena, Glendale, Glendora, Hawaiian Gardens, Hawthorne, Hermosa Beach, Hidden Hills, Huntington Park, Industry, Inglewood, Irwindale, La Canada Flintridge, La Habra Heights, Lakewood, La Mirada, La Puente, La Verne, Lawndale, Lomita, Long Beach, Los Angeles, Lynwood, Malibu, Manhattan Beach, Maywood, Monrovia, Montebello, Monterey Park, Norwalk, Palos Verdes Estates, Paramount, Pasadena, Pico Rivera, Pomona, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, Rosemead, San Dimas, San Fernando, San Gabriel, San Marino, Santa Clarita, Santa Fe Springs, Santa Monica, Sierra Madre, Signal Hill, South El Monte, South Gate, South Pasadena, Temple City, Torrance, Vernon, Walnut, West Covina, West Hollywood, Westlake Village, and Whittier.

**Pervious:** Natural or man-made surfaces that allow the entry of water into the underlying soil, resulting

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in less runoff from the surface when compared to impervious surfaces. Examples of pervious surfaces include vegetated areas, most undeveloped areas, uncompacted earth surfaces, and lattice type modular pavements.

**Phase I Facilities:** This term refers to categories of facilities which are required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with "industrial activity" as required by 40 CFR 122.26(c). The term "industrial activity" is defined in 40 CFR 122.28(b)(14) and in general refers to 11 categories of activities. These categories include:

- I. **FACILITIES SUBJECT TO STORM WATER EFFLUENT LIMITATIONS GUIDELINES, NEW SOURCE PERFORMANCE STANDARDS, OR TOXIC POLLUTANT EFFLUENT STANDARDS (40 CFR SUBCHAPTER N).** Currently, categories of facilities subject to storm water effluent limitations guideline are Cement Manufacturing (40 CFR Part 411), Feedlots (40 CFR Part 412), Fertilizer Manufacturing (40 CFR Part 418), Petroleum Refining (40 CFR Part 419), Phosphate Manufacturing (40 CFR Part 422), Steam Electric (40 CFR Part 423), Coal Mining (40 CFR Part 434), Mineral Mining and Processing (40 CFR Part 436), One Mining and Dressing (40 CFR Part 440), and Asphalt Emulsion (40 CFR Part 442). The fact sheet accompanying this general permit contains additional information pertaining to facilities subject to new source performance standards or toxic pollutant effluent standards.
- II. **MANUFACTURING FACILITIES:** Standard Industrial Classifications (SICs) 24 (except 2411 and 2434), 26 (except 265 and 267), 28 (except 283 and 285) 29, 311, 32 (except 323), 33, 3441, and 373.
- III. **OIL AND GAS/MINING FACILITIES:** SICs 10 through 14 including active or inactive mining operations (except for areas of coal mining operations meeting the definition of a reclamation area under 40 CFR 434.11(1) because of performance bond issued to the facility by the appropriate Surface Mining Control and Reclamation Act (SMCRA) authority has been released, or except for area of non-coal mining operations which have been released from applicable State or Federal reclamation requirements after December 17, 1990) and oil and gas exploration, production, processing, or treatment operations, or transmission facilities that discharge stormwater contaminated by contact with or that has come into contact with any overburden, raw material, intermediate products, finished products, by products, or waste products located on the site of such operations. Inactive mining operations are mined sites that are not being actively mined, but which have an identifiable owner/operator. Inactive mining sites do not include sites where mining claims are being maintained prior to disturbances associated with the extraction, beneficiation, or processing of mined material, or sites where minimal activities are undertaken for the sole purpose of maintaining a mining claim.
- IV. **HAZARDOUS WASTE TREATMENT, STORAGE, OR DISPOSAL FACILITIES:** Includes those operating under interim status or a general permit under Subtitle C of the Federal Resource Conservation and Recovery Act (RCRA).
- V. **LANDFILLS, LAND APPLICATION SITES, AND OPEN DUMPS:** Sites that receive or have received

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Industrial waste from any of the facilities covered by this general permit, sites subject to regulation under Subtitle D of RCRA, and sites that have accepted waste from construction activities (construction activities include any clearing, grading, or excavation that results in disturbance of five acres or more).

- vi. **RECYCLING FACILITIES:** SICs 5015 and 5093. These codes include metal scrap yards, battery reclaimers, salvage yards, motor vehicle dismantlers and wreckers, and recycling facilities that are engaged in assembling, breaking up, sorting, and wholesale distribution of scrap and waste material such as bottles, wastepaper, textile wastes, oil waste, etc.
- vii. **STEAM ELECTRIC POWER GENERATING FACILITIES:** Includes any facility that generates steam for electric power through the combustion of coal, oil, wood, etc.
- viii. **TRANSPORTATION FACILITIES:** SICs 40, 41, 42 (except 4221-25), 43, 44, 45, and 5171 which have vehicle maintenance shops, equipment cleaning operations, or airport deicing operations. Only those portions of the facility involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication) or other operations identified herein that are associated with industrial activity.
- ix. **SEWAGE OR WASTEWATER TREATMENT WORKS:** Facilities used in the storage, treatment, recycling, and reclamation of municipal or domestic sewage, including land dedicated to the disposal of sewage sludge that are located within the confines of the facility, with a design flow of one million gallons per day or more, or required to have an approved pretreatment program under 40 CFR Part 403. Not included are farm lands, domestic gardens, or lands used for sludge management where sludge is beneficially reused and which are not physically located in the confines of the facility, or areas that are in compliance with Section 405 of the CWA.
- xi. **MANUFACTURING FACILITIES WHERE MATERIALS ARE EXPOSED TO STORM WATER:** SICs 20, 21, 22, 23, 2434, 25, 265, 267, 27, 283, 285, 30, 31 (except 3441), 35, 36, 37 (except 373), 38, 39, and 4221-4225.

Note: Category x, Construction activity, is covered by a separate general permit.

Pollutant: Those "pollutants" defined in Section 502(6) of the federal Clean Water Act (33 U.S.C. §1362(6)), or incorporated into California Water Code §13373. Examples of pollutants include, but are not limited to the following:

■ Commercial and industrial waste (such as fuels, solvents, detergents, plastic pellets, hazardous substances, fertilizers, pesticides, slag, ash, and sludge);

■ Metals such as cadmium, lead, zinc, copper, silver, nickel, chromium; and non-metals such as phosphorus and arsenic;

■ Petroleum hydrocarbons (such as fuels, lubricants, surfactants, waste oils, solvents, coolants and grease);

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■Excessive eroded soils, sediment and particulate materials in amounts which may adversely affect the beneficial use of the receiving waters, flora or fauna of the State;

■Animal wastes (such as discharge from confinement facilities, kennels, pens, recreational facilities, stables, and show facilities);

■Substances having characteristics such as pH less than 6 or greater than 9, or unusual coloration or turbidity, or excessive levels of fecal coliform, or fecal streptococcus, or enterococcus;

The term "Pollutant" shall not include uncontaminated storm water, potable water or reclaimed water generated by a lawfully permitted water treatment facility.

The term "Pollutant" also shall not include any substance identified in this definition, if through compliance with the best management practices available, the discharge of such substance has been eliminated to the maximum extent practicable. In an enforcement action, the burden shall be on the person who is the subject of such action to establish the elimination of the discharge to the maximum extent practicable through compliance with the best management practices available.

**Pollutant Loading:** The quantity of a pollutant found in runoff expressed in mass per unit of time. Pollutant loadings are commonly expressed in units of tons/year or pounds/year.

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**Pollutants of Concern:** Pollutants that exhibit one or more of the following characteristics:

- Current loadings or historic deposits of the pollutant are impacting the beneficial uses of a receiving water,
- Elevated levels of the pollutant are found in sediments of a receiving water and/or have the potential to bioaccumulate in organisms therein, or
- The detectable inputs of the pollutant are at a level high enough to be considered potentially toxic to humans and/or flora and fauna.

Pollutants of concern may be different for each receiving water.

For example, Pollutants of concern for the Santa Monica Bay Watershed Management Area include, DDT, PCBs, PAHs, Chlordane, TBT, cadmium, chromium, copper, lead, nickel, silver, zinc, pathogens, TSS (sediment), nutrients, trash and debris, chlorine, oxygen demanding substances, and oil and grease.

**Pollution Prevention:** Includes any planning, schedules of activities, prohibitions of practices, implementation maintenance procedures, and other management practices, to prevent or reduce pollutants in storm water / urban runoff discharges.

**Principal Permittee:** The agency named in the NPDES storm water permit to serve as permit coordinator, responsible for general administration of the permit, and coordinating cooperation by other Permittees, including but not limited to the implementation of local self-monitoring programs and BMPs, and preparation and submittal of reports required by the permit. The Principal Permittee under this Order is the County of Los Angeles.

**Public Agency Vehicle Maintenance/Material Storage Facility:** Any Permittee-owned and/or operated facility that is: used for vehicle or equipment maintenance, repair, washing, or fueling; and/or is required to prepare a hazardous materials business plan.

**Regional Board:** The members of California Regional Water Quality Control Board State agency with primary responsibility for the coordination and control of water quality. This means the California Regional Water Quality Control Board, Los Angeles Region. The Los Angeles Region, is comprised of all basins draining into the Pacific Ocean between the southeasterly boundary, located in the westerly part of Ventura County, of the watershed of Rincon Creek and a line which coincides with the southeasterly boundary of Los Angeles County from the ocean to San Antonio Peak and follows thence the divide between San Gabriel River and Lytle Creek drainage to the divide between Sheep Creek and San Gabriel River drainage.

**Reportable Quantity:** means that quantity of a hazardous substance, as set forth in 40 CFR 302, which requires notification pursuant to 40 CFR 302 in event of that quantity release.

**Receiving Waters:** All surface water bodies within the permit area that are identified in the Basin Plan.

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**SIC:** See Standard Industrial Classification.

**SPCA:** See Storm Water Program Compliance Amendment

**SWRCB:** State Water Resources Control Board

**Secondary Containment:** Structures, usually dikes or berms, surrounding tanks or other storage containers to catch spilled or leaked materials to prevent their discharge to the MS4.

**Sediment:** Organic or inorganic material that is carried by or suspended in water and settles to form deposits in the storm drain system or receiving waters.

**Source Minimization:** Planning or operational practices that reduce the amount of materials stored at a site.

**Standard Industrial Classification (SIC):** The statistical classification standard, organized by industry, underlying all establishment-based federal economic statistics. The SIC of a particular industry is determined using the latest Standard Industrial Classification Manual as prepared by the Executive Office of the President, Office of Management and Budget.

**Storm Drain System:** Streets, gutters, conduits, natural or artificial drains, channels and watercourses, or other facilities that are owned, operated, maintained or controlled by any Permittee and used for the purpose of collecting, storing, transporting, or disposing of storm water.

**Storm Water:** Water which originates from atmospheric moisture (rainfall or snowmelt) and that falls onto land, water, or other surfaces.

**Storm Water Management Program:** This is the sum of all requirements of this Order. This is not to be confused with the CSWMP.

**Storm Water Pollution Prevention Plan (SWPPP):** A plan required by and for which contents are specified in the State of California General Permit for Storm Water Discharges Associated with Industrial Activities, and the General Permit for Storm Water Discharges Associated with Construction Activities. The purpose of the plan is to help identify the sources of pollution that affect the quality of storm water discharges from a site and to describe and ensure the implementation of practices to reduce pollutants in storm water discharges.

**Storm Water Program Compliance Amendment (SPCA):** The SPCA is a report prepared by a Permittee if directed to by the Regional Board Executive Officer for insufficient submittals made under this Order. The SPCA is a part of the Administrative Review section of this Order and will include additions and enhancements to the jurisdiction's storm water program with enforceable implementation deadlines.

**Storm Water Runoff:** That part of precipitation (rainfall or snowmelt) which travels via flow across a surface to the storm drain system or receiving waters. Examples of this phenomenon include: the water

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Los Angeles County Municipal Storm Water Permit  
Order No. 96-XXX

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that flows from a building's roof when it rains (runoff from an impervious surface); the water that flows into streams when snow on the ground begins to melt (runoff from a semi-pervious surface); and the water that flows from a vegetated surface when rainfall is in excess of the rate at which it can infiltrate into the underlying soil (runoff from a pervious surface). When all other factors are equal, runoff increases as the perviousness of a surface decreases.

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**Storm Water Runoff Mitigation Plan:** A plan, to be submitted prior to the submittal of an application for the first planning or building approval for a new development project, that sets forth storm water pollution controls to be incorporated into development projects. The plan shall:

■ be designed to reduce the runoff volume from the site and the pollutant load contributed by the site through incorporation of design elements and practices that address each of the following goals:

■ maximize, to the extent practicable, the percentage of permeable surfaces in order to allow more percolation,

■ minimize, to the extent practicable, the amount of runoff directed to impermeable areas to the storm drain system,

■ maximize, to the extent practicable, storm water filtration and storage for reuse through the use of sediment traps, cisterns or other means,

■ minimize, to the extent practicable, parking lot pollution through the use of porous materials to allow percolation of storm water, through the installation of appropriate treatment controls, or through other means.

**Toxic Pollutant:** Those "pollutants", or combinations of pollutants, defined in Section 502(13) or 307(a)(1) of the federal Clean Water Act (33 U.S.C. §1362(13)).

**USEPA:** United States Environmental Protection Agency

**Waste Minimization:** Operational practices that reduce the amount of waste materials generated. Practices may include recycling and reuse.

**Watershed Management Area (WMA):** Any one of the six general watershed areas covered by this NPDES storm water permit consisting of the: Malibu Creek and other rural areas discharging to Santa Monica Bay, Santa Clara River, Dominguez Channel/Los Angeles Harbor, San Gabriel River, Los Angeles River, and Ballona Creek and other urban areas discharging to the Santa Monica Bay watersheds.

**Watershed Management Area Plan (WMAP):** A plan for implementation of permit requirements that is based on the Countywide Storm Water Management Plan (CSWMP) but further addresses specific issues, pollutants of concern, and BMPs that are unique to the specific Watershed Management Area.

**Watershed Management Committee (WMC):** A committee composed of representatives from each Permittee in a Watershed Management Area. Duties include establishing goals and objectives for the Watershed; prioritizing pollution control efforts; developing a specific Watershed Management Plan; coordinating and facilitating annual reports for the watershed; and facilitating compliance by Permittees in the watershed.

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**Memorandum**

To : Catherine Tyrrell  
Assistant Executive Officer  
Los Angeles RWQCB

Date: 22 May 1996

**ORIGINAL SIGNED BY**

Jorge A. León  
Senior Staff Counsel

From : OFFICE OF THE CHIEF COUNSEL  
STATE WATER RESOURCES CONTROL BOARD  
901 P Street, Sacramento, CA 95814  
Mail Code G-8

Subject: LOS ANGELES COUNTY STORM WATER TENTATIVE PERMIT -  
RECEIVING WATER LIMITATIONS

This memo recommends that the Receiving Water Limitations provision in the draft permit for Los Angeles County and the 85 co-permittee cities be revised to provide for required activities in the event that monitoring shows exceedances of narrative limitations, as included in the December 18, 1995 draft version.

The December 18, 1995 version of the draft permit contained a "Receiving Water Limits" provision that provided for narrative limits and, in the event of exceedances, required activities that, if implemented, assure that the permittees are not to be held in violation of the permit. However, later versions including the May 15, 1996 version of the draft permit deleted the contingency activities language and provide that "so long as [the permittees] are in compliance with the Storm Water Management Program Requirements set forth in this Order", they will not be found to be in violation of the permit. It does not provide for additional required activities to control the discharge of pollutants.

Since the development of this alternative language, the Central Valley Regional Board has adopted a storm water permit for Sacramento County that more closely resembles the Los Angeles Regional Board's December 18, 1995 version in that it includes additional required activities to address exceedances, prior to concluding that no permit violation will be found.

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Catherine Tyrrell

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I recommend that the Receiving Water Limitations provision in the draft permit for Los Angeles County be revised to include the language contained in the December 18, 1995 draft, or similar language, in light of the Central Valley Regional Board's action. While it is in all parties' interest that a permit adopted by the Regional Board not put the permittees into instant noncompliance, it is more defensible against challenge to include language that requires specific activities required to implement the purposes of the Clean Water Act to effectively control discharges of pollutants into storm water conveyances.

If you have any questions or comments, please contact me at (916) 657-2428.

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—  
LOS ANGELES REGION

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500



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May 22, 1996

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QUALITY CONTROL BOARD  
LOS ANGELES REGION

Mr. Robert H. Sulnick  
Executive Director  
American Oceans Campaign  
725 Arizona Avenue, Suite 102  
Santa Monica, California 90401

Dear Mr. Sulnick:

Thank you for your letter of May 15, 1996. I agree with your letter. However, the correspondence you referred to in that letter was not forwarded to me from the Regional Board.

Accordingly, I have spoken with Dr. Bob Ghirelli today who advised me that he was shortly planning on responding to your letter and other letters he has received regarding the Municipal Storm Water Permit (MSWP). In addition, he was planning to add all those letters to our Board agenda information, which he would normally send out two weeks prior to our next Board meeting. Because of your specific request, I asked him to put together a package of all of the correspondence which was sent to my attention or the attention of any other Board member regarding the Municipal Storm Water Permit and send that package to all of the Board members at this time, for their information. He will also send to the Board members, copies of his responses to those letters, when completed.

Thank you very much for bringing this matter to my attention.

Very truly yours,

Michael I. Keston  
Chairman

MIK:gf

cc: Robert Ghirelli

ktw@hds.com

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AMERICAN OCEANS CAMPAIGN

May 15, 1996

Mr. Michael Keston, Chair  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2158

RECEIVED  
MAY 20 1996  
BY:

May 14, 1996

Dear Chairman Keston:

I am writing to ask that you share with your colleagues on the Los Angeles Regional Water Quality Control Board the correspondence directed to you that deals with the municipal stormwater permit.

Individuals and organizations interested in the municipal stormwater permit have identified you, as the appropriate individual representing the Board, to be the recipient of their mail. Many have made the assumption that you would make this correspondence available to your colleagues on the Board. I realize that you will not be voting on this issue and that a new Chair will be presiding at the July 15 meeting when the municipal stormwater permit decision is scheduled. In addition, I now understand that you have no formal obligation to either copy other Board members or compile a file that would be available to all Board members to peruse.

As a matter of good government, I believe that this correspondence should be shared. This mail was not directed to you personally, but as a representative of the decision making body on this issue. Many of us assumed, if erroneously, that the letters would as a matter of course be made available to the Board as a whole.

I strongly urge you to allow the voices of those who have taken the initiative to write to be heard by the other Board members.

Respectfully,  
*Robert H. Sulnick*  
Robert H. Sulnick  
Executive Director

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cc: Board members  
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LOS ANGELES REGION

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May 14, 1996

To: Mr. Jim Noyes  
LACDPW  
(818)458-4022 FAX

From: Catherine Tyrrell  
CRWQCB-LA  
(213)266-7515  
(213)266-7626 FAX

NUMBER OF PAGES SENT (Including this one) 1

MESSAGE: Last week Carlos Urrunaga phoned Joanne Sturges regarding the use of the County Board of Supervisors hearing room at Don's suggestion. Carlos visited the hearing room and has since reserved it for our July 15, 1996, Board meeting. We plan on sending an official request for use of the hearing room today but have been advised by County staff that there may be some charges for use including some insurance questions. We were told that a County Supervisor or Department head could use the room free of charge by request. Would you please make the request for the hearing room on our behalf?

Please call me at (213) 266-7515 so that we can talk about this.

Thanks,

*Catherine*

Catherine Tyrrell

*Thanks for any help you  
can provide on this!*

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

1 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91734-2134  
(213) 266-7500  
FAX: (213) 266-7600



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May 13, 1996

Ms. Joanne Sturges, Executive Officer  
County of Los Angeles  
Board of Supervisors  
Kenneth Hahn Hall of Administration  
500 West Temple Street, Room 383  
Los Angeles, CA 90012

**RE: USE OF COUNTY OF LOS ANGELES BOARD OF SUPERVISORS HEARING  
ROOM FOR A PUBLIC HEARING**

On July 15, 1996, the California Regional Water Quality Control Board, Los Angeles Region, will be holding a Board meeting and public hearing. The main item on the agenda is a storm water discharge permit for the municipalities of Los Angeles County. The audience is expected to be officials representing the municipalities in Los Angeles County, federal and state agencies, and members of the business community and public in Los Angeles County. Total attendance is expected to reach 300 people, which our regular meeting place cannot accommodate. It is for the lack of space at our regular meeting place that we request the use of the County of Los Angeles Board of Supervisors hearing room for Monday, July 15, 1996.

The Board meeting and public hearing will begin at 9 am and may continue until 3 pm. Visual equipment consisting of a separate slide and overhead projector will be provided by our office. However, we request the use of the following County equipment:

- A projection screen for the slide and overhead projectors,
- A VCR with monitor, and
- Microphones and amplification for the Board members and the audience.

Please advise us of any requirements that will be placed upon the State for the use of the hearing room facilities.

If any further information is needed please call me at (213) 266-7510 or have your staff contact Carlos Urrunaga at (213) 266-7598.

Sincerely,

*Robert P. Ghirelli*

ROBERT P. GHIRELLI, D.Env.  
Executive Officer

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

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May 2, 1996

Amy Glad  
Executive Vice President  
BIA of Southern California  
1330 South Valley Vista Drive  
Diamond Bar, CA 91765

FAX: (909) 396-1571

**MUNICIPAL STORM WATER PERMIT: REVISED DRAFT OF DEVELOPMENT  
PLANNING/ CONSTRUCTION SECTION**

Dear Amy:

To follow-up our recent discussion, I am sending you a draft copy of the latest revision of the requirements for Development Planning/ Construction. It has been greatly revised from the December 18, 1996, draft, in response to comments submitted by the building industry, municipalities, and environmental groups. The County of Los Angeles greatly assisted in the revision.

If you would like to discuss the revised draft further, please do not hesitate to call me at (213) 266-7515.

*Catherine*

Catherine Tyrrell  
Asst. Executive Officer

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**III. PROGRAM REQUIREMENTS FOR DEVELOPMENT PLANNING / CONSTRUCTION**

**A. DEVELOPMENT PLANNING**

**1. Countywide Guidelines**

- a. The Principal Permittee in consultation with the Permittees shall develop, as part of the Countywide Storm Water Management Plan (CSWMP), recommended Best Management Practices (BMPs) for use during planning and permitting of all development projects requiring discretionary approval by 18 months after permit adoption. The BMPs shall include:
  - i. Site planning practices;
  - ii. Post-construction best management practices; and
  - iii. Redevelopment and infill practices.

The recommendations shall consider the type of development and the potential for storm water pollution when determining the applicability of BMPs. Cost effectiveness, ease of maintenance and consistency with other environmental mandates may be considered.

For utilization where increased storm water discharge rates will result in an increase in downstream erosion potential, the recommendations shall include BMPs which can be used to maintain peak runoff rates at predevelopment levels to the maximum extent feasible.

- b. The Principal Permittee in consultation with the Permittees shall develop no later than 6 months after Executive Officer approval of the BMPs in III.A.1.a. Standard Urban Storm Water Mitigation Plans and guidelines for their preparation. The Plans shall incorporate the appropriate elements of the recommended BMPs in the Countywide Guidelines. At the minimum, standard plans and guidelines shall be prepared for the following development categories: i) a 100+ home subdivision, ii) a 10-home subdivision, iii) a 100,000+ square-foot commercial development, iv) an automotive repair shop, v) a retail gasoline outlet, vi) a restaurant, and vii) a hillside-located single-family dwelling.

**2. Prioritization of Development Projects**

- a. Priority Projects are development and redevelopment projects which the Building Official (or equivalent municipal authority) determines may have a potential significant effect on storm water

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quality.

- b. Exempt Projects are development and redevelopment projects which the Building Official (or equivalent municipal authority) determines will not have a potential significant impact on storm water quality.

As part of the CSWMP, the Principal Permittee, in consultation with the Permittees, shall develop a documented system, such as a checklist, for determining "potential significant effect" as well as a list of specifically exempt projects by 18 months after permit adoption. Each Permittee shall incorporate a substantially similar system into their procedures no later than 6 months after the approval of the documented system by the Executive Officer.

The documented system shall consider location of the project with respect to designated environmentally sensitive areas and the slope and erosion potential of the site and surrounding areas.

3. Planning Process

In order to integrate storm water management considerations into discretionary development projects at the time that they are first proposed to jurisdictions, and to support other provisions of this Order:

- a. The Principal Permittee in consultation with the Permittees shall develop, as part of the Countywide Plan, storm water management guidelines to use in preparing/reviewing CEQA documents, and in linking storm water quality mitigation conditions to local discretionary project approvals by 18 months after permit adoption.

The guidelines shall address the presentation or restoration of areas that provide water quality benefits such as riparian corridors and wetlands and promote protection of the biological integrity of drainage systems and water bodies.

Each Permittee shall review the Guidelines for the purpose of making appropriate modifications in their internal procedures no later than 6 months after the Regional Board Executive Officer's approval of the Guidelines.

- b. Each Permittee shall include watershed and storm water management considerations in the process whenever a Permittee engages in a significant rewrite of the Permittee's General Plan elements for:

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- i. Conservation; or
- ii. Open space; or
- iii. Land-use; or
- iv. Public utilities; or
- v. Infrastructure.

4. Planning Control Measures

Each Permittee shall develop a program to implement planning control measures consistent with the CSWMP no later than 6 months after approval of the CSWMP by the Executive Officer:

**Priority Project:** For projects that meet the criteria in Provision III.A.2.a. for a Priority Project, each Permittee shall require that the project applicant submit an Urban Storm Water Mitigation Plan, and that the Permittee approve the Plan prior to the issuance of any grading or building permit. The Urban Storm Water Mitigation Plan shall incorporate by detail or reference appropriate post-construction BMPs to:

- i. Implement, to the maximum extent practicable, requirements established by appropriate governmental agencies under CEQA, Section 404 of the CWA, local ordinances and other legal authorities intended to minimize impacts from storm water runoff on the biological integrity of natural drainage systems and water bodies.
- ii. Increase, to the maximum extent practicable, the percentage of permeable surfaces to allow more percolation of storm water into the ground;
- iii. Decrease, to the maximum extent practicable, the amount of storm water directed to impermeable areas and to the MS4;
- iv. Decrease, to the maximum extent practicable, parking lot pollution through the use of appropriate BMPs such as retention, infiltration, and good housekeeping;
- v. Establish reasonable limits on the clearing of vegetation from the project site including, but not limited to, regulation of the length of time during which soil may be exposed and, in certain sensitive cases, the prohibition of bare soil;
- vi. Provide for appropriate permanent controls to reduce storm water pollutant load produced by the development site to the maximum extent practicable.

The Permittee may refer applicants to the *Best Management Practices Handbooks, California Storm Water Quality Task Force,*

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*Sacramento, CA, 1992*, their revisions, the Countywide Storm Water Management Plan, Document No. EPA 840 B 92-002 (1993), and similar manuals for specific guidance on selecting post-construction BMPs for reducing pollutants in storm water discharges.

5. Developer Information Program

The Principal Permittee shall develop a model program by 18 months after permit adoption to inform developers seeking discretionary approvals about:

- a. Development and construction storm water management;
- b. Maximization of pervious areas and storm water infiltration (where geology and topography permit);
- c. Cost effective storm water pollution control measures.

The program shall provide specific guidance on selecting BMPs to reduce pollutants in storm water discharges from urbanized areas, and include appropriate BMPs, educational materials and reference the *Best Management Practices Handbooks, California Storm Water Quality Task Force, Sacramento, CA, 1992*, their revisions, the Countywide Guidelines, Document No. EPA 840 B 92-002 (1993) and similar materials.

Each Permittee shall implement a developer information program consistent with the model no later than 6 months after approval of the model by the Regional Board Executive Officer. Each Permittee's program shall include information about its legal authorities. Permittees are encouraged to engage in joint efforts.

B. DEVELOPMENT CONSTRUCTION

1. Countywide Guidelines

- a. The Principal Permittee in consultation with the Permittees and appropriate stakeholder organizations shall develop by 14 months after permit adoption, as part of the Countywide Plan, minimum recommended requirements and Best Management Practices (BMPs) for all development project construction activities. Requirements and BMPs appropriate for various activities shall be developed along with checklists for use in design and inspection. The Countywide Guidelines shall:
  - i. Include erosion and sediment control practices;
  - ii. Address multiple construction activity related pollutants;
  - iii. Focus on BMPs such as source minimization, education, good housekeeping, good waste management, and good site

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planning;

- iv. Target construction areas and activities with the potential to generate significant pollutant loads;
- v. Require retention on the site, to the maximum extent practicable, of sediment, construction waste and other pollutants from construction activity;
- vi. Require, to the maximum extent practicable, management of excavated soil on site to minimize the amount of sediment that escapes to streets, drainage facilities, or adjoining properties;
- vii. Require, to the maximum extent practicable, use of structural drainage controls to minimize the escape of sediment and other pollutants from the site.
- viii. Require, to the maximum extent practicable, containment of non-storm water from equipment and vehicle washing at construction sites, unless treated to remove sediments and pollutants.

2. Construction Control Measures

- a. Each Permittee shall develop a regulatory program for construction activities consistent with the Countywide Guidelines no later than 6 months after the Regional Board Executive Officer's approval of the minimum recommended requirements and BMPs in III.B.1.a.. The Program shall require, prior to the issuance of any building or grading permit, preparation of appropriate wet weather erosion control and storm water pollution prevention plans which include, by detail or reference, all appropriate construction BMPs contained in the Countywide Guidelines.

Priority Project plans must include a narrative discussion of the reasons used for selecting or rejecting the BMPs. In lieu of a narrative, the project architect or engineer of record may sign a statement on the plan to the effect: As the architect/engineer of record, I have selected appropriate BMPs to effectively minimize the negative impacts of this project's construction activities on storm water quality. The project owner and contractor are aware that the selected BMPs must be installed, monitored, and maintained to ensure their effectiveness. The BMPs not selected for implementation are redundant or deemed not applicable to the proposed construction activities.

- b. Each Permittee shall implement a procedure by 6 months after permit adoption whereby the Permittee shall not issue a grading

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permit for developments with disturbed areas five acres or greater unless the applicant can show that 1) a Notice of Intent (NOI) to comply with the State Construction Activity Storm Water Permit has been filed and 2) a Storm Water Pollution Prevention Plan (SWPPP) has been prepared.

3. Site Inspection

- a. The Principal Permittee, in consultation with the Permittees, shall develop a model construction activity inspection program, which includes checklists, by 14 months after permit adoption. The model program shall include but not be limited to:
  - i. Procedures for construction site inspections;
  - ii. Procedures to require corrective action be undertaken by contractors at noncomplying sites;
  - iii. Procedures for enforcement action against noncomplying construction activity; and
  - iv. Appropriate training for program staff.
- b. Each Permittee shall implement a construction activities inspection program containing all elements of the model no later than 6 months after the Regional Board Executive Officer's approval of the model program. The program may be integrated with the Permittees regular program of construction inspection for maximum efficiency.

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

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April 29, 1996

Mr. Harry W. Stone, Director  
Department of Public Works  
County of Los Angeles  
900 South Fremont Avenue  
Alhambra, CA 91803

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL STORM  
WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY AND CO-PERMITTEES  
(NPDES No. CA0061654, CI 6948)**

In order to demonstrate continued compliance with the Municipal Storm Water Discharge Permit, the Permittees should submit the following to your office:

- a. A letter stating that the Permittee has continued to implement BMPs and other activities submitted in previous Annual Reports; and
- b. A summary list (a list in bullet form is acceptable) of any programs and BMPs implemented within the Permittee's jurisdiction for storm water management for the period between July 1, 1995 - June 30, 1996.

The Permittees should also take this opportunity to highlight any noteworthy accomplishments within the last permit year.

Your office, as Principal Permittee, should gather the information submitted into a single summary report. Please submit the summary report to this Regional Water Quality Control Board by July 1, 1996.

Also, please note that Phase III Permittees should submit information in compliance with Section 4.0 of the current Permit.

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Mr. Harry W. Stone  
April 29, 1998  
Page 2

If you should have any questions in regards to this letter or the Storm Water Program in general, please call Catherine Tyrrell at (213) 266-7515 or have your staff contact Dr. Xavier Swamikannu at (213) 266-7592, or Carlos Urrunaga at (213) 266-7598.

*Robert P. Ghirelli*

ROBERT P. GHIRELLI, D.Env.  
Executive Officer

cc: Jorge León, Office of Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Donald Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone (818) 458-3100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO  
P O BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

April 23, 1996

IN REPLY PLEASE  
REFER TO FILE EP-3

Ms. Catherine Tyrrell  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Ms. Tyrrell:

**PROPOSED NPDES PERMIT ADOPTION SCHEDULE**

At the April 16, 1996 Executive Advisory Committee (EAC) Meeting, the EAC members expressed concern regarding your proposed NPDES Municipal Permit adoption schedule. It is our understanding that the schedule is as follows:

<u>Activity</u>	<u>Completion Date</u>
Mail out Response to Comments and Draft Tentative Order (Permit) (including fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Order	July 15

We are concerned that you have not allowed sufficient time for your staff to respond to comments received from circulation of the Tentative Order.

It is also our understanding that the Tentative Order circulated for comments in late April will be the same Tentative Order presented to the Regional Board. Your Response to Comments received on the April circulation of the Tentative Order will be presented to the Regional Board as a separate item. This insures that the Regional Board views the same permit as that circulated, and also reviews the comments received on the Permit.

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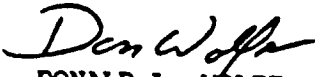
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Ms. Catherine Tyrrell  
April 23, 1996  
Page 2

The EAC would appreciate a written response to confirm the schedule and identifying the process for adoption of the Permit. If you have any questions, please contact me at (818) 458-4014.

Very truly yours,



DONALD L. WOLFE  
Executive Advisory Committee Chair

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LOGGED IN BY TECHNICAL SUPPORT
Name: <u>P. Engler</u>
Date: <u>4-26-96</u>

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

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FAX (213) 266-7600



April 5, 1996

Mr. Mark Pisano  
Executive Director  
SCAG  
818 West Seventh Street  
12th Floor  
Los Angeles, Ca 90017-3435

**1996 ASSOCIATION OF GOVERNMENTS GENERAL ASSEMBLY, STANDING  
COMMITTEE ON PLANNING - Item 4.1**

Having just received the agenda and attachments for the April 11 meeting of the Standing Committee on Planning, I was very much surprised to find that the draft letter to the Regional Board (included in the packet as attachment 4.1) did not resemble my recollections of the discussion and recommendations made by the EEC when I spoke to them on March 7, 1996.

The message I carried to the EEC, one which is of utmost importance to the Regional Board, is our commitment to work with the municipalities of Los Angeles County to develop and implement a successful storm water/urban runoff management program. I also indicated that the schedule for Board consideration of the permit had been delayed until July 15 to provide more opportunity for dialogue and review by municipalities. Your draft letter does not in any way reflect such a message.

Although I would very much like to be at the Planning Committee's meeting (and have accepted your invitation to speak at a General Assembly workshop Friday morning), I am already obligated to meetings in Sacramento on Thursday. Therefore, I ask that you provide this letter to committee members and convey my request that they delay approval of this letter until you can arrange meetings between concerned SCAG elected officials and myself.

When I spoke with the EEC, I also promised them two pieces of information which were not yet available. The first is the summary of the epidemiologic study conducted of 15,000 swimmers in Santa Monica Bay this summer. At the time of the EEC meeting, we anticipated this historic study would be available in early April. It is now scheduled for release in early May. A summary will be forwarded to you promptly at that time.

The second item I promised when completed is a summary analysis of contaminants in storm

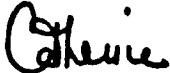
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water. The attached material was compiled by USEPA for the April 1 Regional Board Study Session on the permit. Additionally, I've included an article from the Southern Coastal Water Research Project 1991-92 Annual Report which I thought also pertinent to EEC's request.

SCAG has developed a very effective network of elected official committees and provides a wonderful opportunity for dialogue about important regional issues. However, good decisions require accurate information and a fair hearing. I trust that you will provide the Regional Water Quality Control Board with both an equitable hearing and an opportunity to provide accurate information on our efforts to improve water quality for the citizens of Los Angeles County.

Sincerely,



Catherine Tyrrell  
Assistant Executive Officer, Surface Water Programs

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attachments

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## Surface Runoff to the Southern California Bight

Twenty creeks and rivers drain the coastal mountains, valleys and plains between Point Conception and the U.S./Mexican border and discharge into the Southern California Bight (SCB). A large portion of this discharge is urban runoff. Although a significant amount of data have been collected on contaminant concentrations in surface runoff, there are few published estimates of the mass of contaminants delivered to the ocean (e.g., SCCWRP 1973, Eganhouse and Kaplan 1982, SCAG 1988).

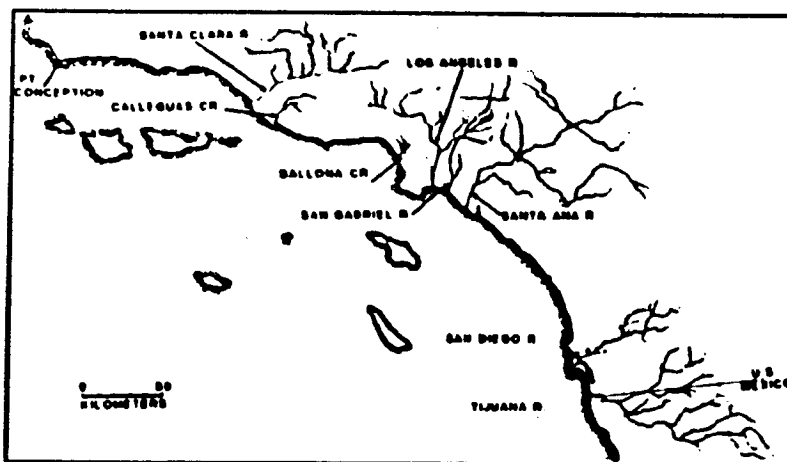
The objective of this study was to measure the concentration of selected constituents in runoff samples from the largest channels in Southern California and to estimate the mass carried to the ocean. We collected samples from eight channels during storms and low flows, and estimated the annual load of contaminants delivered to the ocean.

### Materials and Methods

**Sampling Method and Locations.** Samples were collected between September 1986 and April 1988 with a sampling device patterned after the U.S. Geological Survey suspended sediment pint sampler that has been in use in Southern California for two decades (Young and Bodeen 1991). About 10 samples were collected during each storm and were distributed over rising and declining flows. Samples were collected in the middle of each channel at the same location throughout the

**Figure 1.**

Runoff samples were collected from the eight largest rivers and creeks that discharge to the ocean off Southern California.



study. The sampling device and sampling method are described in SCCWRP (1990). The sampling locations were (Figure 1):

- *Santa Clara River:* Highway 101 8 km from the ocean.
- *Calleguas Creek:* above the tidal prism at Highway 1.
- *Ballona Creek:* Inglewood Boulevard 4 km from the ocean.
- *Los Angeles River:* above the tidal prism at the Willow Street bridge in Long Beach.
- *San Gabriel River:* College Park Drive bridge 4 km above the tidal prism and below confluence of the San Gabriel River and Coyote Creek.
- *Santa Ana River:* Hamilton Street on the border between Huntington Beach and Costa Mesa.
- *San Diego River:* 4 km above the tidal prism east of Fashion Valley Road in San Diego.
- *Tijuana River:* 6 km above the ocean at Dairy Mart Road.

### Analytical Methods.

The samples were analyzed for suspended solids, selected trace metals, and selected trace organics. Sampling handling and analytical methods are described in SCCWRP (1990).

### Load estimates.

The load of a particular constituent in a river is the total mass of the constituent passing the point of measurement over some period of time. We estimated the load of selected constituents transported by the eight rivers with a flow-weighted ratio estimator. Where sufficient contaminant data existed, we stratified the estimates into low and high flows. The inflexion point on the flow duration curve was the cutoff between low and high flow days (SCCWRP, unpublished data). Contaminant data from the two



years were pooled to increase sample sizes.

The flow-weighted ratio estimator is based on the relation between flows and loads:

$$L = QT \frac{\sum_{i=1}^n c_i q_i}{\sum_{i=1}^n q_i}$$

where  $L$  is the load of the constituent,  $Q$  is the mean period flow,  $T$  is the total time in the period,  $c_i$  is the  $i$ th concentration, and  $q_i$  is the corresponding flow rate. The method assumes that flows are continuously monitored, mean flow can be determined accurately, concentrations are related to flows, and the underlying distributions are approximately normal. The estimation

method and its assumptions and shortcomings are described in more detail in SCCWRP (1990).

River flow data were obtained from the U.S. Geological Survey, the Ventura and Los Angeles County Departments of Public Works, and the International Boundary Water Commission. Flow data are reported by water year (October 1 to the following September 30). We modified the

**Table 1.**

Flow-weighted mean constituent concentrations for runoff samples collected between 1986 and 1988 from rivers and creeks that discharge into the Southern California Bight. SS=suspended solids in dry weight.

	SS	Cd	Cr	Cu	Ni	Pb	Zn	ΣDDT <sup>1</sup>	ΣPCB <sup>1</sup>
	(mg/L)	(μg/L)						(ng/L)	
Santa Clara River	995	1.4	60	55	34	90	264	248	51
Calleguas Creek	667	3.0	111	80	62	28	195	176	187
Ballona Creek									
High Flow	402	3.3	38	138	39	286	766	183	166
Low Flow	136	1.3	12	60	19	52	206	25	75
Los Angeles River									
High Flow	1194	3.3	43	138	49	242	618	155	308
Low Flow	71	4.2	11	17	13	23	81	8	21
San Gabriel River	820	3.6	54	87	36	124	408	50	133
Santa Ana River	3,298	2.6	99	141	91	103	719	57	78
San Diego River	283	0.02	10	15	2.4	27	85	90	26
Tijuana River	4,313	5.1	184	416	116	988	1,150	243	634

<sup>1</sup>o,p'-DDT + p,p'-DDT + o,p'-DDE + p,p'-DDE + o,p'-DDD + p,p'-DDD  
<sup>2</sup>Aroclor 1242 + Aroclor 1254

**Table 2.**

Spearman rank correlation coefficients ( $r_s$ ) among constituent concentrations and instantaneous flow in runoff samples collected between September 1986 and January 1987 from rivers and creeks that discharge into the Southern California Bight. Only  $r_s$  significant at  $p < 0.05$  (\*) and  $p < 0.01$  (\*\*) are shown. SS=suspended solids.

	Santa Clara River		Calleguas Creek		Ballona Creek	
	Flow	SS	Flow	SS	Flow	SS
SS		.732**				
Cd		.637*		.940**		.855**
Cr		.684*		.976**		.722**
Cu		.653*		.862**		.946**
Ni		.578*		.904**		.809**
Pb		.639*		.944**		.793**
Zn		.615*		.962**	.556*	.862**
DDT <sup>1</sup>		.834**	.794**	.821**		.695**
PCB <sup>1</sup>			.638*			.840**

<sup>1</sup>o, p'-DDT + p, p'-DDT + o, p'-DDE + p, p'-DDE + o, p'-DDD + p, p'-DDD  
<sup>2</sup>Aroclor 1242 + Aroclor 1254

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water year to run from September 1 to August 31 because the first storm of the study occurred in September 1986 after five months of no precipitation.

**Results**

*Santa Clara River*

The Santa Clara River is 155 km long, drains an area of 4,219 km<sup>2</sup>, and empties into the ocean south of Ventura. The drainage basin is moderately developed with large reservoirs, extensive levees, and agricultural diversions along the coastal plain. In the last 50 km, the river flows over a permeable, sandy, alluvial plain and flow rarely reaches the ocean except during storms. Annual rainfall ranges from 35 cm at the mouth of the river to 90 cm in the mountains (Brownlie and Taylor 1981).

Discharge from the Santa Clara River during the 1987 water year ( $0.9 \times 10^6 \text{ m}^3$ ) was 0.2% of the total gauged runoff to the SCB; discharge during the 1988 water year ( $28.4 \times 10^6 \text{ m}^3$ ) was 4.2% of the total discharge to the SCB. Discharge during the 2-year study was <1% and 19% of the long-term annual mean (1950-88):

$146.2 \times 10^6 \text{ m}^3$ ). The flow gauge on the lower river registered flow on only 18 days in 1987 and 22 days in 1988. Runoff from one storm in February 1988 was 72% of the gauged flow for that year. Most of the discharge from the river occurred from January through March.

Eleven runoff samples were collected from storms that occurred in September 1986 and January 1987. The flow increase during the September 1986 storm was small and not recorded by the flow gauge. Discharge during the January 1987 storm ( $3.6 \times 10^6 \text{ m}^3$ ) was 13% of the annual discharge. One non-storm sample was collected in October 1986. Eleven samples were analyzed for suspended solids and chlorinated hydrocarbons and 10 samples were analyzed for trace metals (Table 1). Most constituents were correlated with flow and suspended solids (Table 2). The volume of discharge from the Santa Clara River increased by nearly 3200% from the first study year to the second. Estimates of constituent mass emissions increased by a similar amount (Tables 3a,b).

*Calleguas Creek*

Calleguas Creek drains 837 km<sup>2</sup>, including the rapidly growing Simi Valley, Thousand Oaks, and Camarillo, and empties into the ocean through Mugu Lagoon. The channel is moderately developed due to levees, agriculture, and urban and suburban development. Five municipal wastewater treatment plants discharged 87,000 m<sup>3</sup>/day (23 mgd) into the creek during the study.

Discharge from Calleguas Creek during the 1987 water year ( $21.7 \times 10^6 \text{ m}^3$ ) and the 1988 water year ( $31.3 \times 10^6 \text{ m}^3$ ) was 5% of the total gauged runoff to the SCB. Discharge during the 2-year study was 59% and 93% of the long-term annual mean (1969-89:  $35.2 \times 10^6 \text{ m}^3$ ). High flows ( $>0.8 \text{ m}^3/\text{s}$ ) occurred 12% of the days during 1987 and 17% of the days during 1988, and accounted for 29% and 51% of the the annual discharge. Most of the discharge from Calleguas Creek occurred from December through March.

Nine runoff samples were collected from Calleguas Creek

Los Angeles River		San Gabriel River		Santa Ana River		San Diego River		Tijuana River	
Flow	SS	Flow	SS	Flow	SS	Flow	SS	Flow	SS
.720**		.797**		.830**		.656**		.600**	
.507**	.787**	.514*	.787**	.604**	.730**			.761**	.547**
.659**	.829**			.872**	.891**		.811**	.560**	.642**
.481**	.813**			.934**	.910**		.730**	.664**	.606**
.691**	.736**			.872**	.926**		.508**	.544**	.652**
.671**	.845**			.905**	.883**		.734**	.509**	.428*
.764**	.697**			.908**	.914**		.648**	.572**	.471**
.492**	.408**	.673**	.533*	.527*	.690**	.674**	.692**	.557**	.397*
								.611**	.407*

during storms in September 1986 and January 1987. These storms accounted for 1.4% of the discharge volume in 1986-87 and 1.8% of the discharge volume in 1987-88. One non-storm sample was taken in October 1986. Ten runoff samples were analyzed for suspended solids and chlorinated hydrocarbons, and nine samples were analyzed for trace metals (Table 1). The concentrations of most constituents were correlated with suspended solids, but not with flow (Table 2). The total volume discharged from Calleguas Creek increased 44% from 1987 to 1988 and so did the mass emission estimates (Tables 3a,b).

**Ballona Creek**

Ballona Creek drains 232 km<sup>2</sup> of urbanized, predominantly residential, Los Angeles. The creek originates northeast of Baldwin Hills and empties into the ocean

through Ballona Wetlands. The creek was once the outlet of the Los Angeles River. The channel is extensively developed as a result of urbanization and concrete channelization.

Discharge from Ballona Creek during the 1987 water year (21.8 x 10<sup>6</sup> m<sup>3</sup>) was 4% of the total gauged runoff to the SCB; discharge during the 1988 water year (51.5 x 10<sup>6</sup> m<sup>3</sup>) was 8% of the total gauged runoff to the SCB. Ballona Creek contributed 58% of the total runoff to Santa Monica Bay in 1987 and 71% in 1988. Discharge during the 2-year study was 48% and 133% of the long-term annual mean (1928-89: 38.7 x 10<sup>6</sup> m<sup>3</sup>). High flows (>0.06 m<sup>3</sup>/s) occurred 5% of the days during 1987 and 11% of the days during 1988, and accounted for 54% and 82% of the annual discharge. Most of the discharge from the creek occurred from November through March.

Fifteen runoff samples were collected from Ballona Creek during storms in September 1986, January 1987, and March 1987. Discharge during the storms averaged 2.4 x 10<sup>6</sup> m<sup>3</sup> (range: 0.7-4.5 x 10<sup>6</sup> m<sup>3</sup>). The three storms accounted for 3.4%, 9.1%, and 20.5% of the total annual discharge volume. Two non-storm samples were collected in October 1986 and September 1987. Seventeen samples were analyzed for suspended solids, 16 samples were analyzed for trace metals, and 15 samples were analyzed for chlorinated hydrocarbons (Table 1). The concentrations of most constituents were correlated with suspended solids, but not with flow (Table 2). Flow-weighted mean concentrations at high flow were two to seven times greater than flow-weighted mean concentrations at low flow (Table 1).

High flow discharge accounted

**Table 3a**  
Estimates of the mass emission of selected contaminants from rivers and creeks that discharged into the Southern California Bight between September 1, 1986 and August 31, 1987. VOL=annual discharge volume; SS=suspended solids in dry weight.

	VOL	SS	Cd	Cr	Cu	Ni	Pb	Zn	EDDT <sup>1</sup>	EPCB <sup>1</sup>
	(x 10 <sup>6</sup> m <sup>3</sup> )	(x 10 <sup>3</sup> kg)	(kg)							
Santa Clara River	0.87	862	1	52	48	29	78	227	0.2	0.04
Calleguas Creek	21.7	14,452	65	2,407	1,735	1,344	607	4,228	3.8	4.1
Ballona Creek										
High Flow	11.8	4,708	39	440	1,632	462	3,354	8,976	2.1	2.0
Low Flow	10.0	1,390	13	117	604	194	518	2,067	0.3	0.7
Los Angeles River										
High Flow	61.0	72,437	202	2,609	8,372	2,973	14,682	37,492	9.7	18.8
Low Flow	95.4	6,799	402	1,053	1,628	1,245	2,202	7,756	1.0	1.9
San Gabriel River	139.2	114,127	501	7,516	12,109	5,010	17,258	56,785	7.0	18.5
Santa Ana River	17.6	58,060	46	1,742	2,481	1,601	1,812	12,650	1.0	1.4
San Diego River	20.0	5,667	<1	192	300	48	541	1,702	1.8	0.5
Tijuana River	10.2	43,883	52	1,870	4,231	1,178	10,051	11,706	2.5	6.4

<sup>1</sup>o, p'-DDT + p,p'-DDT + o, p'-DDE + p, p'-DDE + o, p'-DDD + p, p'-DDD  
<sup>2</sup>Aroclor 1242 + Aroclor 1254

for 70-97% of the estimated annual constituent loads (Tables 3a,b). Total runoff volume increased 137% from 1987 to 1988 and high flow runoff volume increased 259%. Mass emissions estimates increased 100% to 300%. Low flow volume and estimates of the constituent mass emissions were similar in both years.

**Los Angeles River.**

The Los Angeles River is the largest single source of gauged runoff to the SCB. It originates in the Santa Susana and Santa Monica mountains in the western part of the San Fernando Valley and also receives runoff from the western San Gabriel Mountains and the Santa Monica Mountains. The river enters the ocean in San Pedro Bay, but historically it has changed course several times and entered the ocean as far north as Ballona Creek and as far south as

the San Gabriel River (Brownlie and Taylor 1981).

The Los Angeles River drains 2,155 km<sup>2</sup> and, for its size, is one of the most extensively controlled rivers in the world. All of the river has been channelized below the upland catchments (Brownlie and Taylor 1981). In 1982, nearly 60% of the river basin was urban and suburban, 40% was native vegetation, and 1% was agriculture (Department of Water Resources 1982).

Discharge from the Los Angeles River during the 1987 (156.4 x 10<sup>6</sup> m<sup>3</sup>) and 1988 (217.3 x 10<sup>6</sup> m<sup>3</sup>) water years was 33% of the total gauged runoff to the SCB. Discharge during the 2-year study was 83% and 115% of the long-term annual mean (1929-88: 189 x 10<sup>6</sup> m<sup>3</sup>). High flows (>5 m<sup>3</sup>/s) occurred 8% of the days during 1987 and 9% of the days during 1988, and accounted for 39% and 57% of the annual discharge. Most

of the discharge occurred from November through March.

Fifty-three runoff samples were collected from the Los Angeles River during six storms that occurred in September 1986, January 1987, March 1987, October 1987, December 1987, and January 1988. Mean discharge during the storms was 12.9 x 10<sup>6</sup> m<sup>3</sup> (range: 2.9-21.3 x 10<sup>6</sup> m<sup>3</sup>) was 6-8% of the annual discharge. One non-storm sample was collected in October 1986. Fifty-four samples were analyzed for suspended solids, trace metals, and chlorinated hydrocarbons (Table 1). The concentrations of all constituents except cadmium were correlated with flow and suspended solids (Table 2). Concentrations at high flow were three to 17 times greater than concentrations at low flow for all constituents except cadmium (Table 1).

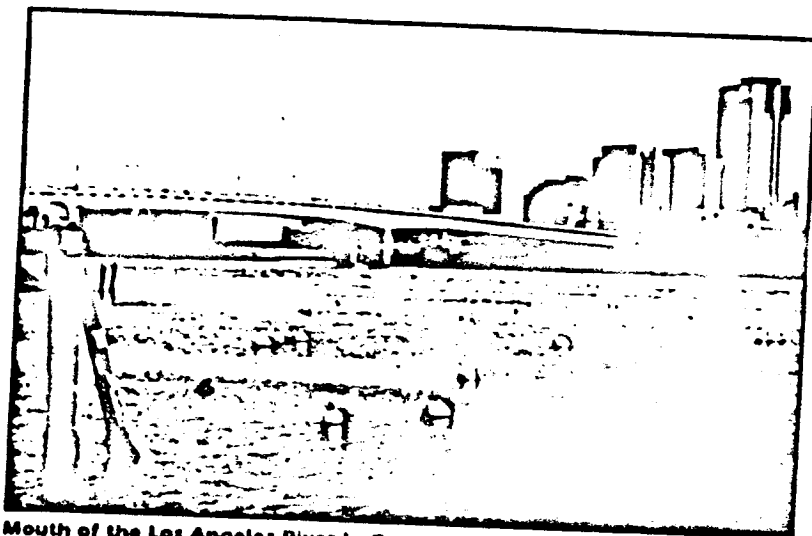
**Table 3b.**

Estimates of the mass emission of selected contaminants from rivers and creeks that discharged into the Southern California Bight between September 1, 1987 and August 31, 1988. VOL=annual discharge volume; SS=suspended solids in dry weight.

	VOL	SS	Cd	Cr	Cu	Ni	Pb	Zn	EDDT <sup>1</sup>	I PCB <sup>2</sup>
	(x 10 <sup>6</sup> m <sup>3</sup> )	(x 10 <sup>3</sup> kg)	(kg)							
Santa Clara River	28.4	28,236	40	1,702	1,560	965	2,554	7,490	7.0	1.4
Calleguas Creek	31.3	20,893	94	3,408	2,508	1,944	878	6,113	5.5	5.9
Ballona Creek										
High Flow	42.2	16,971	140	1,584	5,850	1,667	12,093	32,356	7.7	7.0
Low Flow	9.3	1,305	12	110	567	182	486	1,940	0.2	0.7
Los Angeles River										
High Flow	123.9	148,011	409	5,330	17,107	6,074	29,998	76,609	19.8	38.4
Low Flow	93.4	6,628	392	1,027	1,587	1,213	2,147	7,560	0.9	1.9
San Gabriel River	138.6	113,671	499	7,486	12,060	4,990	17,189	56,558	6.9	18.4
Santa Ana River	25.8	85,294	67	2,559	3,644	2,352	2,662	18,584	1.5	2.0
San Diego River	30.5	8,620	<1	292	457	73	822	2,589	2.7	0.8
Tijuana River	40.2	173,270	205	7,385	16,706	4,653	39,684	46,221	9.8	25.5

<sup>1</sup>o,p'-DDT + p,p'-DDT + o,p'-DDE + p,p'-DDE + o,p'-DDD + p,p'-DDD  
<sup>2</sup>Aroclor 1242 + Aroclor 1254

CONTINUED



Mouth of the Los Angeles River in Queenway Bay, Long Beach

Except for cadmium, 66-95% of the estimated annual constituent loads was discharged during high flow days (Tables 3a,b). One third to one half of the estimated annual load of cadmium went out during high flow days. Total high flow volume increased 104% from 1987 to 1988. Consequently, the mass of solids and contaminants discharged during high flow days more than doubled (Tables 3a,b). Low flow volume and constituent mass emission estimates were similar in both years.

The Los Angeles-Glendale, Tillman, and Burbank water reclamation plants discharge tertiary effluent (disinfected) into the Los Angeles River. Their effluents constituted 69% of low flow, 9% of high flow, and 45% of total river discharge in the 1987 water year and 85% of low flow, 6% of high flow, and 39% of total river discharge in 1988 (SCCWRP 1990). Except for cadmium and nickel, the combined

mass emissions from the three water reclamation plants accounted for less than 30% of the estimated loads delivered to the SCB by the Los Angeles River.

#### *San Gabriel River.*

The San Gabriel River drains 1,663 km<sup>2</sup> between the San Gabriel Mountains and the ocean and is the second largest single source of gauged runoff to the SCB. The river travels nearly 90 km from the junction of the East and West forks in the San Gabriel Valley to its mouth east of Long Beach. Annual rainfall ranges from 35 to 50 cm in the valleys and coastal plain, to 50 to 120 cm in the mountains (Brownlie and Taylor 1981). The San Gabriel River basin is extensively developed and the river is the second most controlled river in Southern California. Most of the river below the upland catchments has been channelized (Brownlie and Taylor 1981). The river receives tertiary treated wastewater from four water reclamation plants.

Discharge from the San Gabriel River was 30% of the total gauged runoff to the SCB during the 1987 water year ( $139.2 \times 10^6 \text{ m}^3$ ) and 21% of the total gauged runoff to the SCB in 1988 ( $138.6 \times 10^6 \text{ m}^3$ ). In both years, discharge was 115% of the long-term mean annual (1964-88:  $120.9 \times 10^6 \text{ m}^3$ ). Most of the discharge occurred from November through March. High flows ( $>5 \text{ m}^3/\text{s}$ ) occurred 10% of the days during 1987 and 11% of the days during 1988, and accounted for 31% and 39% of the annual discharge.

Sixteen runoff samples were collected from the San Gabriel river during storms in September 1986 and January 1987. These storms accounted for 5% and 9% of the flow for the year. Two non-storm samples were collected in October and November 1986. Sixteen samples were analyzed for suspended solids and chlorinated hydrocarbons, and 13 samples were analyzed for trace metals (Table 1). The concentrations of few constituents were correlated with flow or suspended solids (Table 2).

The San Gabriel River was the only channel where discharge did not increase from 1987 to 1988. Mass emission estimates for all nine constituents in 1988 declined by an amount proportional to the decline in discharge (Tables 3a,b).

#### *Santa Ana River.*

The Santa Ana River drains 4,406 km<sup>2</sup> and receives runoff from the San Bernardino, San Jacinto, and San Gabriel mountains. The river travels over 250 km before it empties into the ocean north of Newport Bay. Annual rainfall ranges from 30 to 45 cm in the plains and valleys to 50 to 120 cm in the mountains (Brownlie and

Taylor 1981). The Santa Ana River basin is extensively developed with water diversions for municipal and agricultural uses, flood control, and hydroelectric plants. Inputs from four municipal wastewater treatment plants ( $5.7 \times 10^3 \text{ m}^3/\text{day}$ , 150 mgd) augment the flow. Approximately 33% of the basin is urban and suburban, 10% is agriculture, and 57% is native vegetation (Department of Water Resources 1982, 1985).

Discharge from the Santa Ana River was 3% of the total gauged runoff to the SCB during the 1987 water year ( $17.6 \times 10^6 \text{ m}^3$ ) and 4% of the total gauged runoff in 1988 ( $25.8 \times 10^6 \text{ m}^3$ ). Discharge during the 2-year study was 36% and 63% of the long-term annual mean (1924-88:  $40.7 \times 10^6 \text{ m}^3$ ). Control facilities, spreading grounds, and the sandy river channel prevent everything but storm flow from reaching the ocean. There were no low flow days during the 2-year study; all of the flow went out in about 30% of the year. Most of the discharge

from the river occurred from January through April.

Nineteen runoff samples were collected from two storms in January and April 1988. The January storm was 17%, and the April storm was 2%, of the annual flow. One non-storm sample was collected in December 1987. Twenty samples were analyzed for suspended solids and trace metals, and 19 samples were analyzed for total DDT and total PCB (Table 1). The concentrations of all constituents except total PCB were correlated with flow and suspended solids (Table 2). Total runoff volume increased nearly 50% from 1987 to 1988; annual mass emission estimates increased by a proportional amount (Tables 3a,b).

**San Diego River**

The San Diego River drains 1,119 km<sup>2</sup> extending from the Laguna Mountains in east San Diego County to the ocean near Mission Bay. The San Diego River is moderately developed. Only the

last few kilometers of the channel are lined with concrete. Annual rainfall varies from 23 cm on the coastal plain to 81 cm in the mountains (Brownlie and Taylor 1981). Approximately 21% of the basin is urban and suburban, 2% is agriculture, and the remaining 77% is native vegetation (Department of Water Resources 1987).

Discharge from the San Diego River during the 1987 water year ( $20.0 \times 10^6 \text{ m}^3$ ) and the 1988 water year ( $30.5 \times 10^6 \text{ m}^3$ ) was 4% of total gauged runoff to the SCB. Discharge during the 2-year study was 48% and 23% of the annual mean (1982-86:  $36.5 \times 10^6 \text{ m}^3$ ). Most of the discharge from the river occurred from November through April. Unlike the other seven channels, the flow duration curve had no inflexion point so flows were not stratified.

Twenty-nine runoff samples were collected from storms that occurred in October 1987, January 1988, and April 1988. Discharge during the storms averaged  $1.1 \times 10^6 \text{ m}^3$  (range: 0.04-2.4

**Table 4a**

Constituent mass emissions as percent of total for channels that discharged into the Southern California Bight between September 1, 1986 and August 31, 1987. Vol=volume of discharge, SS=suspended solids in dry weight. Total is the volume (m<sup>3</sup>) discharged and the estimated mass emission (kg).

	Vol	SS	Cd	Cr	Cu	Ni	Pb	Zn	EDDT <sup>1</sup>	EPCB <sup>1</sup>
Santa Clara River	0.2	0.1	0.1	0.3	0.1	0.2	0.2	0.2	0.7	<0.1
Calleguas Creek	5.6	2.4	4.9	13.4	5.2	9.5	1.2	2.9	12.9	7.6
Ballona Creek	5.6	14.8	3.9	3.1	6.7	4.7	7.6	7.7	8.2	5.0
Los Angeles River	40.3	23.4	45.6	20.3	30.2	29.9	33.0	31.5	36.4	38.1
San Gabriel River	35.9	45.0	38.0	41.8	36.5	35.6	33.8	39.5	23.8	34.1
Santa Ana River	4.5	2.9	3.5	9.7	7.5	11.4	3.5	8.8	3.4	2.6
San Diego River	5.2	1.8	<0.1	1.1	0.9	0.3	1.1	1.2	6.1	0.9
Tijuana River	2.6	9.6	3.9	10.4	12.8	8.4	19.7	8.2	8.5	11.8
Total	$387.8 \times 10^6$	$1.33 \times 10^6$	1,319	17,997	33,131	14,084	51,103	143,590	29.4	54.3

<sup>1</sup>o, p'-DDT + p, p'-DDT + o, p'-DDE + p, p'-DDE + o, p'-DDD + p, p'-DDD  
<sup>2</sup>Aroclor 1242 + Aroclor 1254

$\times 10^6 \text{ m}^3$ ). The three storms accounted for 0.1%, 2.6%, and 7.9% of the total annual discharge. Two low-flow samples were collected in September and December 1987. Thirty-one samples were analyzed for suspended solids, 30 samples for trace metals, and 29 samples for chlorinated hydrocarbons (Table 1). The concentrations of most constituents were correlated with suspended solids, but not with flow (Table 2). Concentrations of cadmium, nickel, and total PCB were especially low because of the high proportion of non-detectable measurements. Runoff volume increased by 53% in 1988 and mass emission estimates increased by a proportional amount (Tables 3a,b).

**Tijuana River.**  
The Tijuana River straddles the border between the United States and Mexico. Twenty-seven percent of the drainage basin (4,483 km<sup>2</sup>) lies in Mexico and 73% lies in the United States. The

channel is moderately developed and water is diverted to San Diego and Tijuana on its way to the ocean through Tijuana Slough. On the U.S. side, 3% of the land is urban and suburban, 2% is agriculture, and 95% is native vegetation (Brownlie and Taylor 1981).

Approximately  $16.6 \times 10^6 \text{ m}^3/\text{yr}$  (12 mgd) of raw sewage and industrial and agricultural wastes are discharged into the Tijuana River south of the International Border (International Boundary and Water Commission, personal communication, October 16, 1990). This was 163% of the total discharge from the river in 1987 and 41% of the total discharge in 1988.

Discharge from the Tijuana River was 2% of total gauged runoff to the SCB during the 1987 water year ( $10.2 \times 10^6 \text{ m}^3$ ) and 6% of total gauged runoff during the 1988 water year ( $40.2 \times 10^6 \text{ m}^3$ ). Discharge during the 2-year study was 24% and 94% of long-term annual mean (1950-88:  $42.9 \times 10^6$

$\text{m}^3$ ). Discharge during high flows ( $>0.5 \text{ m}^3/\text{s}$ ) occurred 7% of the days in 1987 and 24% of the days in 1988, and accounted for 48% and 82% of the annual river discharge. Most of the discharge from the river occurred from January through April.

Twenty-seven runoff samples were collected from storms in October 1987, January 1988, and April 1988. Discharge during these storms was 1-15% ( $0.4\text{-}6.0 \times 10^6 \text{ m}^3$ ) of the annual discharge volume. Two non-storm samples were collected in September and December 1987. Twenty-nine samples were analyzed for suspended solids, 28 samples for trace metals, and 27 samples for chlorinated hydrocarbons (Table 1). The concentrations of all constituents were positively correlated with flow and suspended solids (Table 2). The volume of discharge from the Tijuana River increased by 300% from 1987 to 1988; mass emission estimates increased by the same amount (Tables 3a,b).

**Table 4b**

Constituent mass emissions as percent of total for channels that discharged into the Southern California Bight between September 1, 1987 and August 31, 1988. Vol=volume of discharge, SS=suspended solids in dry weight. Total is the volume ( $\text{m}^3$ ) discharged and the estimated mass emission (kg).

	Vol	SS	Cd	Cr	Cu	Ni	Pb	Zn	EDDT <sup>1</sup>	EPCB <sup>1</sup>
Santa Clara River	5.0	1.5	2.2	5.5	2.5	4.0	2.4	2.9	11.3	1.4
Calleguas Creek	5.6	2.0	5.1	11.2	4.0	8.1	0.8	2.4	8.9	5.8
Ballona Creek	9.1	25.3	8.2	5.5	10.3	7.7	11.6	13.4	12.7	7.5
Los Angeles River	38.6	21.8	43.1	20.5	30.2	30.2	29.6	32.9	33.5	39.5
San Gabriel River	24.6	24.7	26.8	24.2	19.4	20.7	15.8	22.1	11.1	18.0
Santa Ana River	4.6	2.4	3.6	8.3	5.9	9.8	2.5	7.3	2.4	2.0
San Diego River	5.4	1.5	<0.1	0.9	0.7	0.3	0.8	1.0	4.3	0.8
Tijuana River	7.1	20.8	11.0	23.9	26.9	19.3	36.6	18.1	15.8	25.0
Total	$563.6 \times 10^6$	$2.41 \times 10^6$	1,859	30,955	62,046	24,144	108,514	256,020	62.1	102.0

<sup>1</sup>o, p'-DDT + p, p'-DDT + o, p'-DDE + p, p'-DDE + o, p'-DDD + p, p'-DDD

<sup>2</sup>Aroclor 1242 + Aroclor 1254

## Discussion

### Hydrography.

The rivers in this study occupy basins that are either moderately developed (Santa Clara, San Diego, and Tijuana rivers and Calleguas Creek) or extensively developed (Los Angeles, San Gabriel, and Santa Ana rivers and Ballona Creek) (Brownlie and Taylor 1981). In the most developed and manipulated basins, river discharge was extremely variable. The Santa Clara and Santa Ana rivers had no measurable flow for most of the year. River discharge was a combination of surface and groundwater runoff, releases from control facilities, and inputs of domestic and industrial wastes. Most of the flows resulted from winter rains; storms are short and intense, and discharge is variable from year to year.

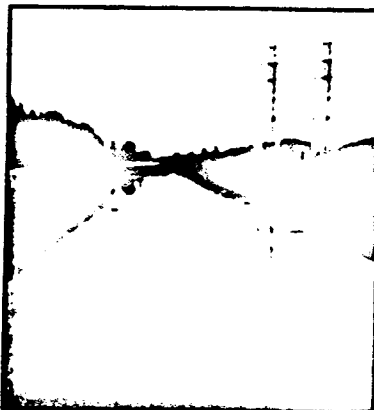
The eight channels sampled during this 2-year study contributed about 80% of the total gauged runoff to the SCB. Annual river discharge during the study ranged from  $0.9 \times 10^6 \text{ m}^3$  for the Santa Clara River to  $217 \times 10^6 \text{ m}^3$  for the Los Angeles River. Annual discharges were, on average, 61% below their long-term means during the 1987 water year (range: 17-99% below), and 31% below their long-term means in 1988 (range: 75% below to 33% above). Rainfall in Los Angeles was 48% below its long-term average (1877-1988: 37.5 cm) during 1987 and 15% below average during 1988.

### Constituent Concentrations.

Between September 1986 and April 1988, 191 runoff samples were collected from eight channels and analyzed for nine constituents; 179 samples were

collected during storms and 12 samples were collected during non-storm periods. Constituent concentrations varied from one to two orders of magnitude among the channels (Table 1).

The Tijuana River, which is dominated by raw sewage, had the highest concentrations for eight of the nine constituents, and the second highest concentration for the remaining constituent. The



Storm channel in Orange County

Santa Clara River, a predominantly agricultural watershed, had the highest concentration of total DDT. The San Diego River, which drains a less developed basin, had the lowest concentrations for four of the nine constituents, and the second lowest concentrations for three of the remaining constituents. Low flow in the Los Angeles River had the lowest concentrations for five constituents and the second lowest concentrations for three of the remaining constituents. Interestingly, most of the water in the Los Angeles River at low flow is tertiary effluent from water reclamation plants.

\*

The concentrations of most constituents were correlated with suspended sediment, and to a lesser extent with river discharge (Table 2). The average rank correlation among constituent concentrations was 0.53. The average rank correlation among constituent mass emissions was 0.86 in 1987 and 0.80 in 1988 indicating that within a channel, conditions that result in high concentrations and mass emissions for one constituent hold for the other constituents. As river discharge rises, sediment mobilization increases. Suspended sediment, usually the constituent present in the greatest amount, comes from soil erosion and, in urban areas, particles produced by automobiles, industry, and commercial activities. Contaminant concentrations and mass emissions increase with increasing sediment loads because the surface area available for adsorption increases (Williams *et al.* 1966, Bradley and Lewin 1982).

### Constituent Mass Emissions.

Mass emissions varied from one to three orders of magnitude among the channels (Tables 4a,b). The Los Angeles, San Gabriel, and Tijuana rivers had the highest mass emissions, and the Santa Clara and San Diego rivers had the lowest. Mass emission estimates generally increased from 1987 to 1988 in proportion to the increase in volume discharged. For Ballona Creek and the Los Angeles River, most of the increase was associated with the increased frequency of high flows; low flow volumes and constituent mass emissions estimates were similar between years.

Not all of the channels sampled discharge directly into



the ocean. Several channels discharge into harbors and lagoons; it is possible to calculate the load delivered by the river to the harbor or lagoon, but because of modifications due to processes in the receiving body of water, this is not necessarily the load delivered to the ocean. Harbors and lagoons can be a partial trap for many substances, especially sediment.

### Conclusions

Urbanization has had a dramatic impact on the landscape of southern California during the past century. Rivers and streams have been extensively modified to conserve water for a growing population and to control floods (Brownlie and Taylor 1981). Urbanization increases the quantities of pollutants that reach rivers and streams. The type and concentrations of pollutants in runoff are determined by the degree of urbanization, types of land use, densities and types of vehicle traffic and animal populations, atmospheric quality, municipal cleaning practices, and specific storm characteristics (Randall and Grizzard 1983, Ellis 1986). Most river discharge and contaminant transport in southern California happens during winter storms that occur intermittently and unpredictably. ■

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### Acknowledgements

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April 4, 1996

**Carl's Jr.**  
... OVER ...

**CARL'S JR. RESTAURANTS**  
Carl Karcher Enterprises, Inc. 1200 North Harbor Boulevard P.O. Box 4349 Alhambra, California 92803-4349 (714) 774-5796

Frank Kuo  
Waste Management Division  
Los Angeles County Department of Public Works  
900 S. Fremont Avenue  
Alhambra, CA 91803-1331

Re: Suggested Restaurant Checklist

Dear Frank:

Per your request are the following suggested checklist items to assist restaurants in controlling materials from entering storm drains:

- Dump all wastewater into floor drains or mop sinks, especially when cleaning floor mats and equipment.
- Dump waste shortening into grease receptacles using the appropriate transfer equipment to prevent spillage.
- Maintain clean trash corrals, parking lot, sidewalks, patios and playground areas by cleaning at reasonable intervals. Reasonable intervals depend upon the volume of each restaurant.
- Clean the outdoor areas in item #3 without washing wastewater into the stormdrains. Alternate methods are spot mopping and dry absorbant pickup.

These suggested items are the same as we discussed at our March 15 meeting. I also would like to re-emphasize that restaurants cannot control post-consumer waste beyond the restaurant site. Public outreach materials are an involved process that requires special planning, preparation and approval from upper management.

If you have further questions or comments please call me at 714-774-5796, ext. 1713.

Sincerely,

Mike Kissel  
Environmental Specialist

- c: L. Russ
- G. Breitbart - CRA
- M. Beard - California Environmental Associates
- C. Tyrrell - LA Regional Water Quality Control Board

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HON. ALLAN ALEXANDER, MAYOR  
CITY OF BEVERLY HILLS  
450 N. CRESCENT DRIVE  
BEVERLY HILLS CA 90210-4854

HON. JOHN BOWLER, MAYOR  
CITY OF HERMOSA BEACH  
1315 VALLEY DRIVE  
HERMOSA BEACH CA 90254-3814

HON. RAYMOND MATTINGLY, MAYOR  
CITY OF PALOS VERDES ESTATES  
340 PALOS VERDES DR., WEST  
PALOS VERDES ESTATES, CA 90274

HON. GODFREY PERNELL, MAYOR  
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2 PORTUGUESE BEND RD  
ROLLING HILLS CA 90274-5199

HON. JOHN HEILMAN, MAYOR  
CITY OF WEST HOLLYWOOD  
8300 SANTA MONICA BLVD  
WEST HOLLYWOOD CA 90069-4314

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ARCADIA CA 91007-3499

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COMMERCE CA 90040-1487

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1400 HIGHLAND AVENUE  
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INGLEWOOD CA 90301-1750

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COVINA CA 91723-2197

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21815 PIONEER BLVD  
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LA VERNE CA 91750-3899

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NORWALK CA 90650-3182

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6615 S PASSONS BLVD  
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CITY OF POMONA  
505 S GAREY AVE  
POMONA CA 91766-3320

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245 E BONITA AVE  
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SANTA FE SPRINGS CA 90670-3679

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CITY OF WALNUT  
21201 LA PUENTE RD  
WALNUT CA 91789-2018

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WEST COVINA CA 91793-1440

HON. MICHAEL SULLENS, MAYOR  
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13230 E PENN ST  
WHITTIER CA 90602-1772

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
BERKELEY PARK, CA 91754-2154  
TEL (213) 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. BEVERLY O'NEIL, MAYOR  
CITY OF LONG BEACH  
333 W OCEAN BLVD 9TH FL  
LONG BEACH CA 90802-4664

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

The Regional Water Quality Control Board is currently engaged in developing the terms of the draft renewal storm water/urban runoff NPDES Permit (Municipal Storm Water Permit) for Los Angeles County and its municipalities. Participants in the process include representatives from the County, the 85 cities within the County, and various other stakeholders.

Some of the most commonly asked questions we have encountered during our negotiations focus on why it is necessary to have a storm water permit, and why it is important to implement a storm water management program within the County. One obvious answer is that we need to meet the legal requirements of Federal law; however, there are other compelling reasons as well. More and more, we are finding that the environmental effects of storm water/urban runoff pollution are impacting not only coastal regions, but also inland communities. Storm water pollution has become a concern for all municipalities, and is now truly a national concern.

To provide additional background on the subject, we are enclosing the February 1996 issue of National Geographic Magazine which includes an outstanding article entitled "Our Polluted Runoff" (see page 106). This in-depth piece describes the storm water/urban runoff pollution problem which affects urban and rural areas throughout the United States. It also helps to answer some of the questions that have been posed by local city officials and program managers as to why a storm water management plan is necessary.

We are also enclosing an updated schedule for the Regional Board's consideration and adoption of the Municipal Storm Water Permit.

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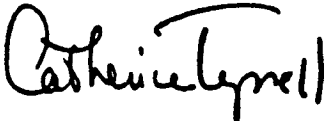
ENCLOSURE

April 3, 1996  
Page 2

As you review these materials, please keep in mind that the Regional Board is committed to working with the municipalities of Los Angeles County to develop and implement a successful storm water management program. Please circulate both this letter and the magazine to Council Members so that they too can see how serious and how extensive the urban runoff problem is, and how other communities are tackling this problem.

Should you have any questions on either the adoption schedule or the development process, please feel free to call me at (213) 266-7515. You or your staff can also contact either Xavier Swamikannu at (213) 266-7592, or Carlos Urrunaga at (213) 266-7598 for assistance.

Thank you again for taking the time to review the enclosed information, and for working so diligently with us to protect our inland and coastal waters.



CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

**attachments**

cc: Jorge León, Office of Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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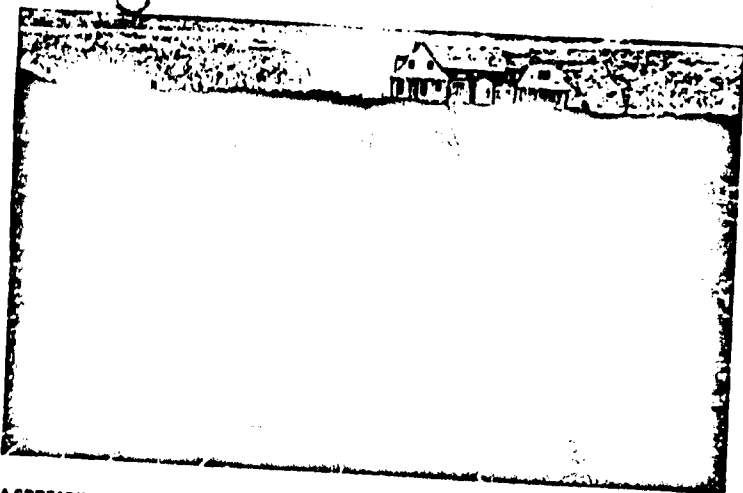
WIDESPREAD AS RAIN  
AND DEADLY AS POISON

# Our Polluted Runoff

R0031995

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#### A SPREADING STAIN

Anything that goes into the ground will get into the Lost River," says Kentucky hydrologist Nicholas Crawford. Standing near an old well, he uses harmless fluorescent dye to map the course of the underground river through a karst, or limestone, aquifer. Because karst is so porous, pollutants like spilled oil from a construction site (above) quickly seep into the river below.

**O**LD-TIMERS NAMED the lake Torch, acclaimed its turquoise beauty, and boasted that it ranked among the best and brightest of all the inland waters of the world. A glacier-carved gem it was, sparkling on the northwest shoulder of Michigan's Lower Peninsula. That's the way I remembered it. But on this day there would be no torch-bright sparkle, only a sky like slate, a wet wind out of the west, and onshore rain running down to the lake in gray rivulets.

We watched the rain from the cab of Jack Norris's truck, parked at the end of a gravel road, lakeside near the little resort town of Bel-laire. Not quite an old-timer himself, Norris had brought me here from his own place a few miles north, also lakeside, to test our memories. His test: To see if he could describe how the lake had changed over half a century of his being here. My test: To see what I recalled,

Photographer PETER EASTON was a major contributor to the *Geographic*'s Special Edition on Water (November 1991). This marks his ninth assignment for the magazine.

after 50 years, of one summer at a boy's camp long gone from the maple woods beside this road. I told Norris that I could remember this adolescent mud puppy from southern Ohio, me, peering over a canoe gunwale straight down through 40 feet of crystalline water, the cobbled lake bottom as sharply etched as if it had been pressed beneath a plate of glass.

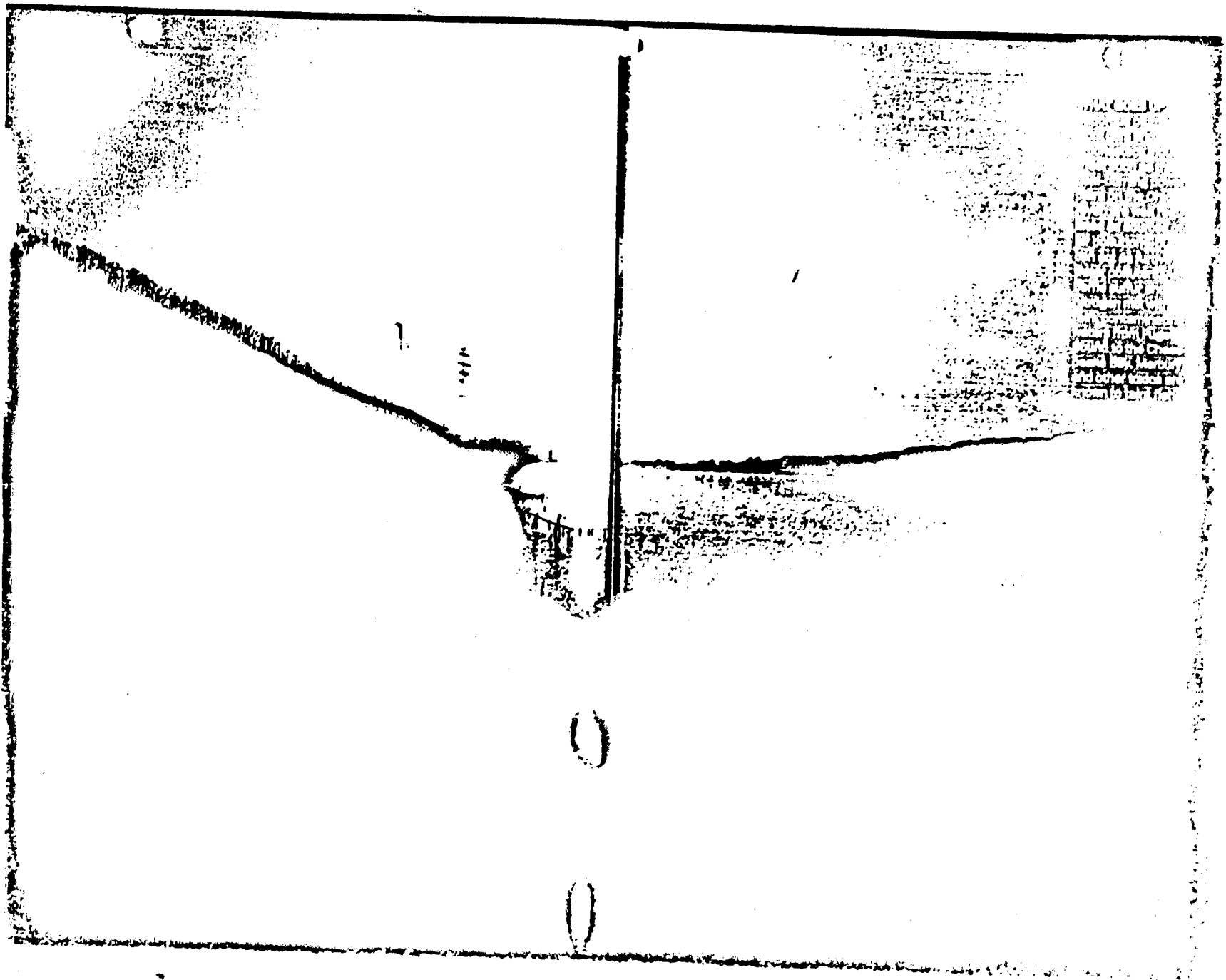
"It's different now," Norris said. "Still pretty clear in the deeper water. But now there's that gray stuff at the edge of the lake. It's a precipitate caused by too much algae. You know it's there when you step in the lake to go swimming and around each (fall) is a puff of silt, and you say, 'Gee, that wasn't here when I was a kid. What's going on here?'"

What's going on here is going on almost everywhere in the United States today. Poison runoff, it's called, or "nonpoint-source" pollution to distinguish it from those visible and traceable source points—the dis-harge pipes of industry and the outfalls of municipal sewage-treatment plants—that are regulated under the Clean Water Act. By limiting or requiring

(Continued on page 111)

*National Geographic, February 1996*





9 VOL

5242

# Learning to tread softly

"Our success is that we still have trout in the streams," says Maureen Kennedy Templeton, drain commissioner of Michigan's Grand Traverse County, which has launched intense efforts to protect rivers and streams in areas like the Mitchell Creek watershed (below). This once rural basin is growing fast as retirees, families, and businesses are lured by its beauty. With them comes pollution. Here's how the creek is coping:

**SEPTIC SEEP**  
Like a full sponge, aging septic drain fields— which treat sewage by slow filtration— and overloaded sludge holding tanks can leak bacteria, viruses, and liquid poisons into groundwater. Homeowners with septic systems are urged to pump tanks every two years and avoid pouring paints or solvents into their sinks.

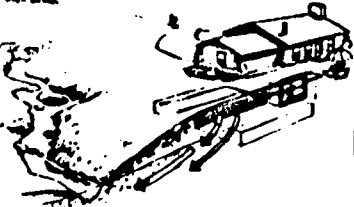


**LEAFY BUFFERS**  
Lacking a cushion of wetlands, streams can still be partly sheltered from runoff by the county's 50-foot buffer zones and tree-planting landowner-plant wetlands (shades to trap sediments, slow flow and promote shade and wildlife habitat).

**NATURAL FILTERS**  
Key to a healthy watershed, low-lying wetlands trap runoff and filter its harmful sediments through natural vegetation. Grand Traverse County requires a 25-foot setback from wetlands and has persuaded many landowners to donate wetland acreage for protection.

**ON THE FARM**  
As suburban sprawl expands, few remain near Mr. Clark. Many of the farmers-on help protect the watershed by using a light touch with pesticides and fertilizers, forcing livestock away from streams, and recycling barnyard manure to cut crop-killing pests.

**WHEN THE SKY FALLS**  
Though this watershed is free of smokestacks, lakeside breezes bear the acidic cargo of incinerators and industries from Chicago and Green Bay, as well as nitrogen from car exhaust and phosphorus from wastewater. Mercury has made fish from inland lakes unsafe to eat.



**CONSTRUCTION**  
Before driving a nail, builders navigate a slew of rules. Depending on the job, they must control soil erosion with filter fabric, clear sediment away from exposed dirt, build sediment basins, and plant protective buffers.



**SEDIMENT TRAPS**  
Not required by law at all large developments sites near Mitchell Creek, which built traps to catch storm-water runoff—and provide a storage facility for the odd flash. Some ponds are installed one with an impervious lining to trap settling silt and a second that allows sediment to slowly slip into the water.

**FOREST FRIENDLY**  
Though thick with trees, the Mitchell Creek watershed has no active logging. Elsewhere in the region, logging can create serious soil-moisture problems for streams as dirt pours off clear-cut slopes and across roads. Loggers or foresters tend to leave greenways along streams and cut selectively to reach cut-trip runways out.

**URBAN GOOSE**  
It's a watershed's worst nightmare. As fields are paved for roads and parking, runoff speeds faster off the land. The torrent picks up stream-choking debris, causes floods, erodes banks, and prevents the slow filtration needed to recharge groundwater tables.



treatment of industrial and municipal discharges, this federal act has cleaned up a lot of water in the 24 years it's been on the books, and it is likely to go on doing that unless the 104th Congress, in the mood for regulatory rollbacks, weakens its enforcement.

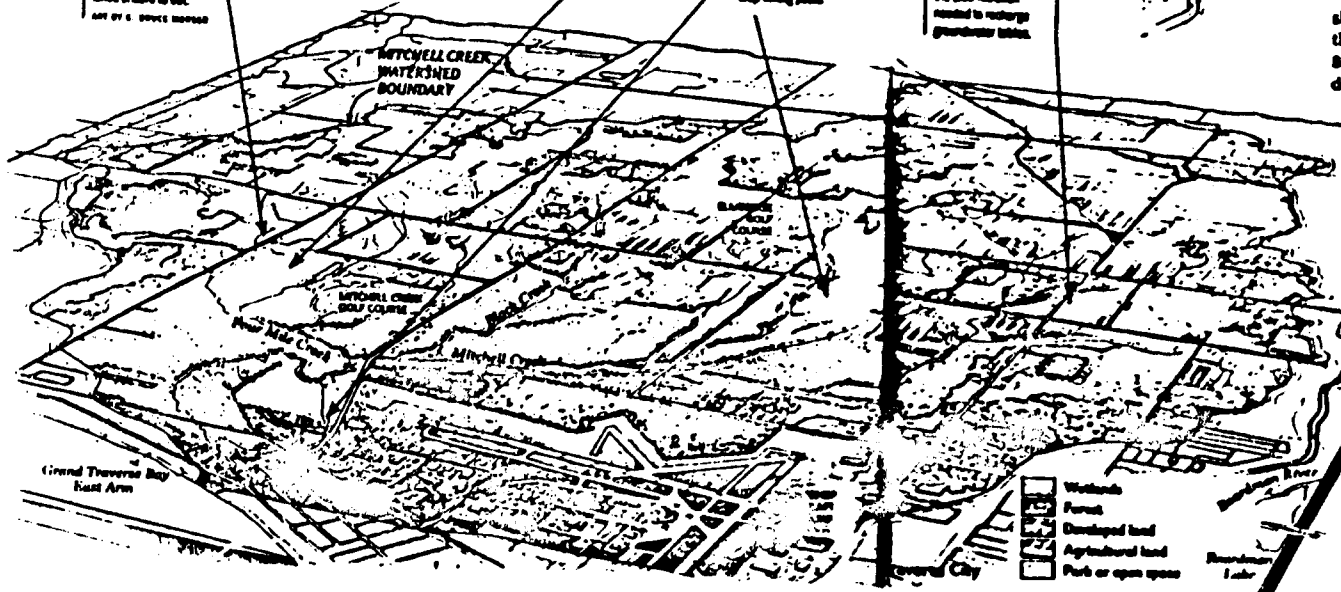
But this other kind of pollution, which can also make water unsafe to drink or to swim or fish in, remains largely unregulated, because its sources are as numerous and diverse as the population. In fact, hardly anyone stops to think about poison runoff even though practically everyone helps produce it. Here's how:

Rainfall, snowmelt, or irrigation runoff moves across the land. The water picks up whatever people have left in its path—residues from the production of food, the mankuring of yards, the use of motor vehicles, the construction of roads and buildings—and, following gravity's directions, transports these contaminants to the nearest stream, lake, estuary, or aquifer.

At Torch, about 20 miles long and almost 300 feet deep, the runoff is mostly residential, loading the lake with nutrients from septic systems and fertilized lawns. Excess nutrients promote the growth of algae. Decaying algae can steal oxygen from other life-forms, such as fish. People like Jack Norris step into a lake and notice puffs of silt around each footfall.

Estimates are sketchy as to poison runoff's share of the total water-pollution problem in the U. S.; some put its contribution as high as 80 percent, up from less than half the total two decades ago, when point sources were spewing

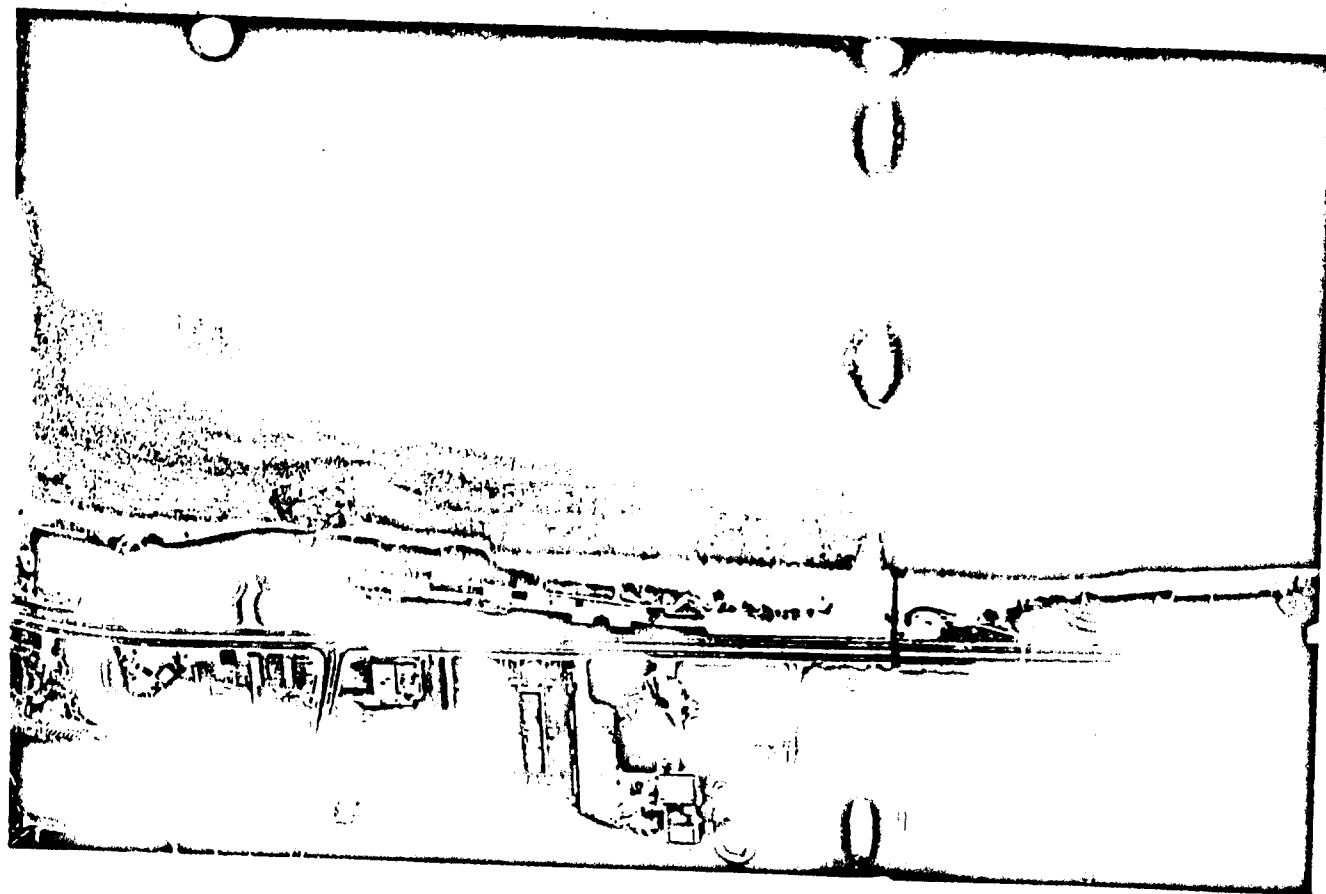
out most of the contaminants. Urban and suburban storm-water flows—what the rains sweep from our streets and driveways and parking lots—account for a large part of the nonpoint problem nationwide. Another part is fallout: When air pollutants are washed from the sky by precipitation or dusted into a watershed on the wind, then, by the official alchemy of federal definition, they too become vested as nonpoint sources of water pollution. By far the largest share of the runoff



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### BAYSIDE BLUES

A telltale finger of smoky brown points to the entry of Mitchell Creek, which carries sediment into Michigan's Grand Traverse Bay. Offshore, dark splotches of submerged algae and rooted plants feed on phosphorus, a nutrient that hitchhikes in with sediments. Water quality hasn't suffered yet. But if unchecked, decaying plants can suck oxygen from the bay, harming aquatic life.

watershed's solutions until we understand how and why we are a part of its problems. So I selected Torch Lake and the neighboring tributaries, all of which flow into Lake Michigan's Grand Traverse Bay. For here, as in other parts of the country where growing human numbers and urban development stack up against once-pristine waters, a high-quality resource is at imminent risk, and with it the economic future of the entire region.

**T**HE GRAND TRAVERSE BAY watershed embraces almost a thousand square miles on the eastern shore of Lake Michigan, just a hop, skip, and jump below the Straits of Mackinac. The regional hub is Traverse City, once a Victorian gingerbread logging town snuggled at the foot of the bay but now a vibrant resort community with Bauhaus-modern motels and shopping plazas sprawling in every landward direction. Add to this urban core dozens of villages and rural townships scattered across parts of five counties, and you're looking at a watershed population of 90,000—not counting as many as two million tourists drawn to the region throughout the year.

"We're the number one tourist destination in the whole Midwest," a local booster bragged the day this tourist first checked in. I had just checked out a copy of the *Traverse City Record-Eagle*. The lead story reported that, in a national survey, Traverse had scored eighth among the top ten "best retirement places." Both revelations would support a comment I heard later from Michael Stifler of the Michigan Department of Environmental Quality. "We just wanted people to come up here for a weekend," said Stifler, "but now they're staying for the rest of their lives."

The major attractions tend to be water dependent: boating, bathing, and fishing on the big bay itself, more than a hundred inland

problem, however, belongs to agriculture: 44 of the states report groundwater contamination caused by runoff from farms and ranches.

As I would discover in the course of visiting a few of those states, sediments, organic matter, and bacteria flow from our fields and pastures by the ton—an average of five tons an acre a year if we're counting just the soil eroded from croplands. Besides choking aquatic life in the recipient waterways, the sediments deposit piggyback traces of fertilizer, herbicides, and insecticides too.

Half the nation's drinking-water wells are reported to contain nitrates unleashed, for the most part, by agricultural fertilizers; excessive nitrates can deplete oxygen in the bloodstreams of infants and result in a kind of slow

suffocation known as blue-baby syndrome. Herbicides that are suspected carcinogens have left their spoor in the tap water of scattered communities coast to coast. Livestock wastes have tainted municipal water supplies. In 1993 runoff carried a parasite called cryptosporidium to the drinking water of Milwaukee, Wisconsin, sickening thousands of people and killing a hundred who suffered from immune-system deficiencies. Manure was among the suspected sources.

One would think an incident such as that might paste the runoff problem on the public conscience, much as Ohio's Cuyahoga River helped inspire point-source regulations when industrial wastes set that riverine sewer on fire in 1969. But for runoff awareness, no such

luck. One recent poll found that when it comes to fixing responsibility for dirty water, most respondents still believe that all the culprits sit in corporate boardrooms, while farmers and homeowners vie for the title of Mr. Clean.

Not that I expected to encounter such misinformed attitudes in northern Michigan. On the contrary, I had come here because this region already possessed a reputation for recognizing its runoff problems, and I hoped it might somehow provide a cautionary showcase for the rest of the nation. Each one of us is a citizen of a watershed, wherever we may live. But none of us—in Michigan or Maine or Montana—can break bad habits and mend behaviors enough to become a part of our

National Geographic February 1994

The Political River

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ponds and lakes, and many miles of trout streams, including the blue-ribbon Boardman River. In the rolling sand hills east of Torch Lake there are snowmaking ski resorts to pick up the slack in the winter doldrums. Sprinklers keep a dozen golf courses glistening green. And all this water—at least the part that isn't sopped up by evapotranspiration—sooner or later runs and seeps to the bay, bearing many of the pollutants that people have left in their wake.

It is not the kind of pollution that always leaves an immediate, visible stain. The bay is still blue. The streams appear to run clear between fern-festooned banks. As a result, reports of trouble in Eden have taken some people by surprise. That was certainly the case a decade ago when a study commissioned by the Michigan United Conservation Clubs held "explosive development" in the Grand Traverse region responsible for "degradation of virtually all natural resources," including groundwater in some areas. But there was little lingering skepticism when, a few years ago, a handful of local organizations established the Grand Traverse Bay Watershed Initiative to enlist the public in a grassroots effort to save the bay and its tributaries from poison runoff. The Initiative now numbers more than a hundred groups.

And now? "We're getting out the message," says James Haveman, executive director of the Northwest Michigan Resource Conservation & Development Council and one of the Watershed Initiative's founding fathers. "But if we can't change the way people live their everyday lives, none of it's going to make one bit of difference."

**G**ETTING PEOPLE TO CHANGE what they don't know they're doing is a tall order, Jack Norris was telling me that rainy morning at the edge of Torch Lake. Wading, you can curse the gray silt swirling around your ankles, but what exactly do you change if you can't see how it got there in the first place?

One thing a person could change, if he happened to occupy one of the older lakeshore vacation homes converted to year-round retirement living, is the septic system, or at least the frequency with which the residual sludge is pumped out of the septic tank. "A lot of these systems around Torch are older than we are," said Norris. "Some septics are just a

50-gallon drum, sunk in the ground, and now, instead of weekends and summers only, they're getting use 365 days a year. The old systems just can't handle it."

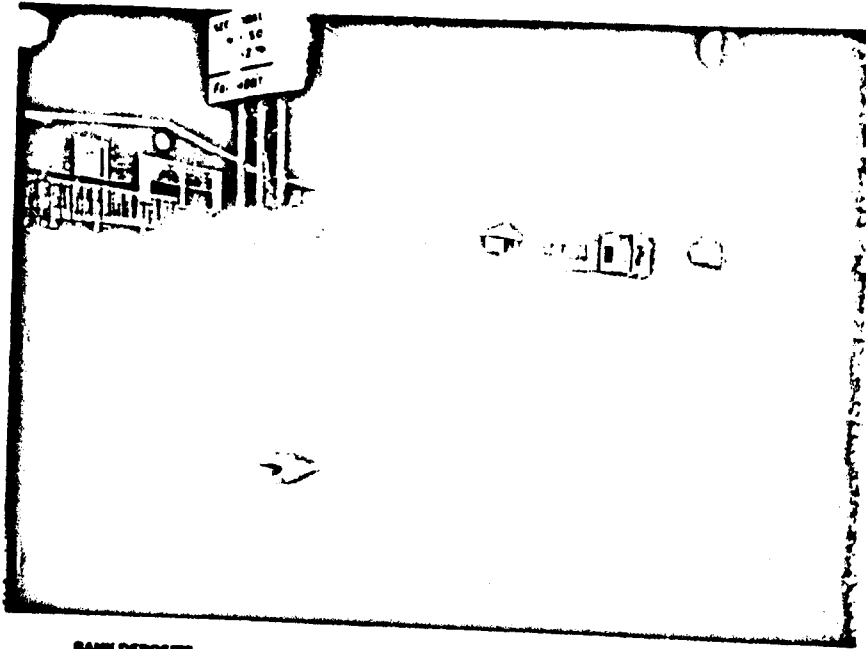
Poking around the lakeshore roads, I could see that many of the older homes and their septic systems were situated about as close to the water as structures can get without falling in or running afoul of some skimpy setback ordinance. If enough of these septics failed, how long would it take for a lake like Torch to choke on the runaway nutrients?

For the answer to that I headed for the village of Torch River to call on Bill Weiss, an environmental engineer who serves as resources consultant to a couple of the lake associations allied with the Grand Traverse Bay Watershed Initiative. Weiss had been out on the bay in the rain all day and was warming himself by his fireplace.

"It's the sponge effect that worries me," he said. "Our sandy soils are excellent for taking up phosphorus. They act like a sponge. The soils pick up a certain amount of phosphorus until you reach a point where that sponge is full. It can't absorb any more." Weiss cudged the fire with a poker and said, "We're sitting on a 50-year time bomb, and we can't reverse it. We can't turn off these sponges once they're full and nutrients are still flowing into them. When plumes of nutrients hit the lake, they grow phytoplankton, and more phytoplankton decreases the transparency of the water, and there goes Torch Lake."

Phosphorus and nitrogen from lawn fertilizers are also invading the lakes and streams of the watershed. You can't see these nutrients either, at least not with the naked eye. What you can see are all the green lawns. They are ubiquitous. They are of great concern to Pete Bruski, erosion-control inspector for the Grand Traverse County Drain Commissioner's Office.

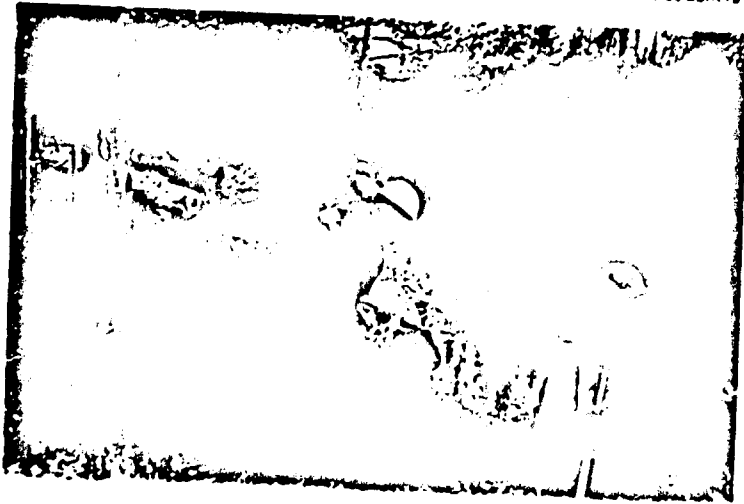
"To most homeowners," Bruski told me as we toured the Mitchell Creek area on the east side of Traverse City, "if a little's good, more is better." He was speaking of the turf-greening chemicals that some people apply to their lawns every four to six weeks. "I guess you've noticed they do a tremendous amount of fertilizer sales around here. With higher property values around the bay and along the edge of any water, people kind of expect to have that manicured estate look. They're not about to switch over to natural ground cover

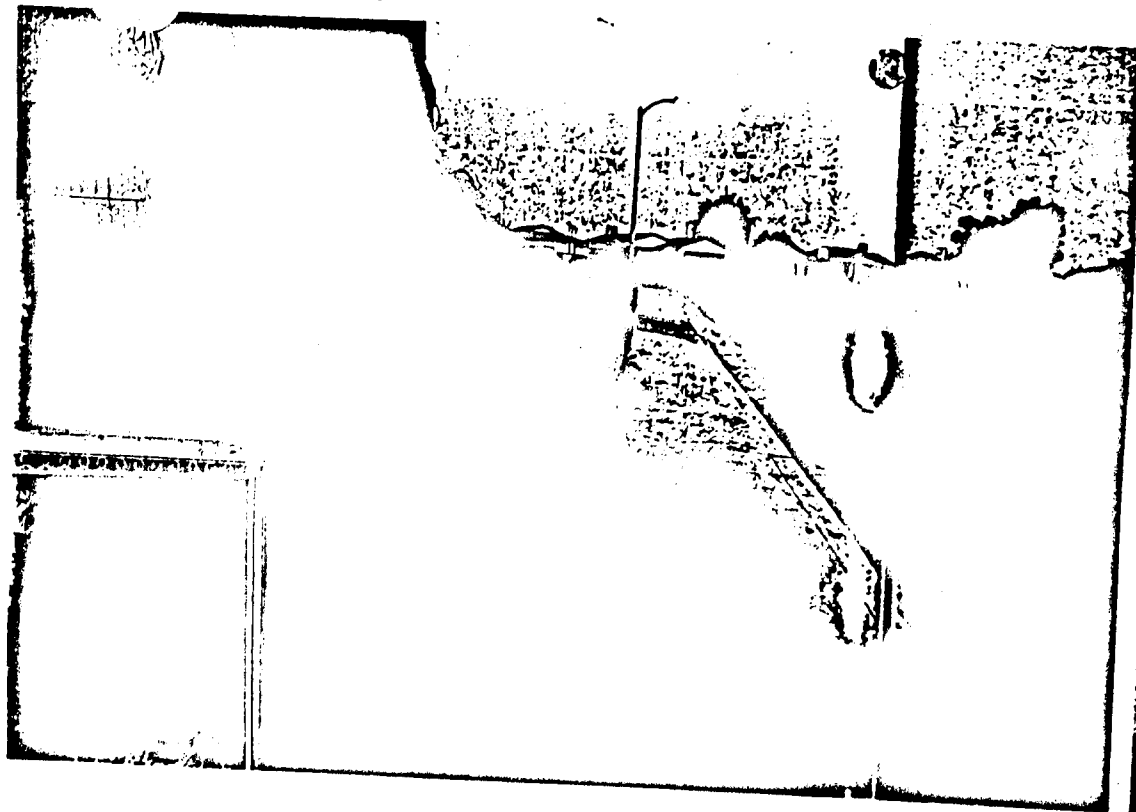


#### BANK DEPOSITS

Armed with shovels and hoes, a prison crew applies topsoil and native plants to restore an eroded bank of the Boardman River, a major tributary of Grand Traverse Bay. Trampled by hikers and fishermen, the worn slopes dump sand into this blue-ribbon trout stream, suffocating spawning grounds and altering flow. New shrubs and grasses planted at some 65 sites now help block a thousand tons of sand a year from entering the Boardman. "Old-timers have seen the river coming back," says project director Steve Largent.

Tidier banks cause other problems. Lush lawns—like those fronting nearby Kids Creek (above)—can spill excess fertilizer and pet wastes into streams unless homeowners plant shoreline buffers.

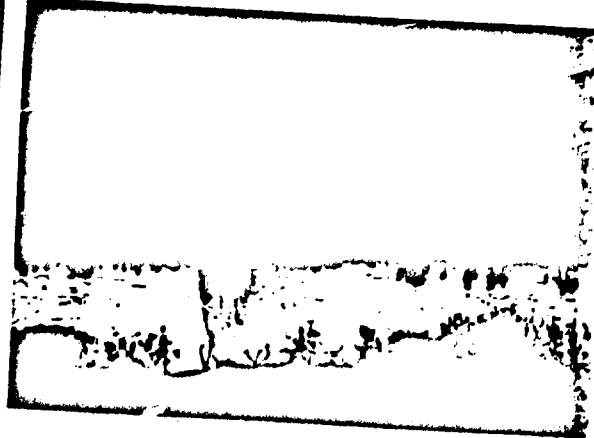




#### TRAGIC HARVEST

"I'd like to get out of here," says Rita Lorta of McFarland, California, a farm community whose children suffer a cancer rate three times the national norm. Rita's daughter Rosalinda - raised in nearby Delano and seen here in a family photograph - died in 1980 of a rare cancer at age three. Some residents blame such deaths on the insecticides and herbicides sprayed on surrounding crops and suspected of poisoning local air and water. State and federal health officials found no link. Community members have asked the EPA to investigate further.

Farther north, farmers irrigate crops with water from the San Joaquin River (below). Many have begun using sprinklers and sediment basins in cut water use and the runoff of soil bearing evils like residual DDT.



and let brush grow up to buffer the water. It just isn't going to happen."

Bruski and I were standing at the mouth of Mitchell Creek, where it empties into Grand Traverse Bay. Offshore we could see dark green mats of algae and aquatic plants undulating in the shallows like giant, tethered manna rays - a legacy of the creek's nutrient load.

Bruski's other big concern - for the lower Boardman River, downtown, as well as for Mitchell Creek - is the toxic freight that storm-water runoff carries from such impervious surfaces as the parking lots of malls and shopping strips. Here is a kind of behavior that may never change, for how do you get people to stop running errands in motor vehicles made of metal and powered by fossil fuel? Asphalt and concrete catch it all: the oil, the grease, the poisonous lead, the fish-tainting mercury, the zinc, the copper, and the fallout from grinding engine parts, rusting exhaust

systems, abraded brake linings. Then comes the storm and away it goes, though not always directly down creek and river to Grand Traverse Bay. The big malls and commercial strips are now obliged by county ordinance to provide retention basins to catch the runoff long enough for the heavy metals and toxic sediments to settle out. (The owner of a basin is expected to scoop up accumulated sediments from time to time and truck them to a landfill willing to accept the material, invariably the landfill is in somebody else's watershed.)

"We're just delaying the time it takes for that water to get into the streams," says Maureen Kennedy Templeton, the county drain commissioner. "And there are still so many areas, so many places, that don't have any storm-water retention at all."

There is another side to the problem, a side apart from the blue water advocates that, for better or worse, seem to drive this through

vacation and retirement economy. It happens to take the form of a white blossom that bursts each May upon hundreds of thousands of trees, upon a hundred hillsides beside the bay. Traverse City, in case you didn't know it, is the Cherry Capital of the World. Nearly half the nation's crop of tart cherries comes off these hills, more than a hundred million pounds a year, most of it destined to satisfy the national appetite for cherry pie. And, before changes brought improvements in many of the growers' management practices, the nurturing of this prodigious crop tended to produce an uncertain amount of poison runoff too.

**G**ROWN PRACTICES put money in your pocket. That's the way I have Amon was telling it when I stopped by his orchard on a high sand ridge northeast of town. Amon is a second generation cherry grower. He nurtures 200 acres of trees,

using trickle irrigation to bottle feed fertilizer directly to each tree, instead of broadcast using the fertilizer, which tends to ratchet up the quantity needed for coverage, not to mention the leftovers leaching out toward the lake. And pesticides? Yes, there has to be some use of pesticides because of the insects that attack the cherries. But now growers like Amon are attempting to reduce pesticide use by managing the bad bugs with good ones. "The good eat the bad," said Amon. "As long as the good bugs are more numerous than the destructive ones, you don't have to spray."

Listening to Amon's plain talk about the prospects of this practice called IPM, for integrated pest management, I realized that if water consciousness was beginning to change our behavior anywhere, it was not in the cities or the suburbs but right where the problem looms largest nationwide - down on the farm. I had already observed some signs of change

National Geographic, February 1986

The Politics of Runoff

while visiting a number of agricultural regions, apart from northern Michigan's, where the produce, the practices, and the problems are a whole shade different from those of Dave Amon and the Grand Traverse watershed. I had wanted to find out if dairy farmers in Oregon were changing enough to help save a world-class estuary from choking on polluted runoff, so I paid a visit to Tillamook Bay. And I wanted to see how farmers are trying to take the erosive sting out of furrow irrigation in drier country than Michigan's, so I had gone to California's San Joaquin Valley.

**T**HIS IS CROWS LANDING, California, hard by the San Joaquin River and just down the road from Patterson, the Apricot Capital of the World. (Take that, Traverse City.) The apricots almost get lost among all the almonds, walnuts, mixed melons, dry beans, peas, tomatoes, broccoli, cauliflower, spinach, and sugar beets. Two hundred square miles of irrigated orchards and fields roundabout, with produce valued at more than a hundred million dollars a year, and all of it within the metes and bounds of the West Stanislaus hydrologic unit. The unit is a study area the U. S. Department of Agriculture has set up to see if something can't be done to reduce a hemorrhaging of soil into the San Joaquin River. Something has to be done because—no thanks to furrow irrigation—each year the West Stanislaus area loses as much as a million tons of sediments to the river, much of it laced with the active residues of yesteryear's pesticides.

Crows Landing is named for John Bradford Crow, who came overland in the 1860s, by wagon train from Missouri, to farm wheat and barley along the river's alluvial flats. Norman Crow is a great-great-grandson. He grows walnuts, seed onions, and dry beans and says he is willing to try anything that will reduce the loss of soil from his land. He plants cover crops of barley between his walnut trees to hold the soil in place during irrigation. For his 110 acres of dry beans he has rented, at considerable expense, a mobile sprinkler system for the pre-planting soak. This will save him tons of soil that would otherwise be lost by furrow irrigation to the tailwater ditches and the San Joaquin. Tall, rawboned Norman Crow, at the edge of his bean fields, bends down to pick up a clump of dark brown loam. "This is what God

gave us to work with," he says, crumbling the soil in his fingers. "This is my livelihood. I can't afford to lose it."

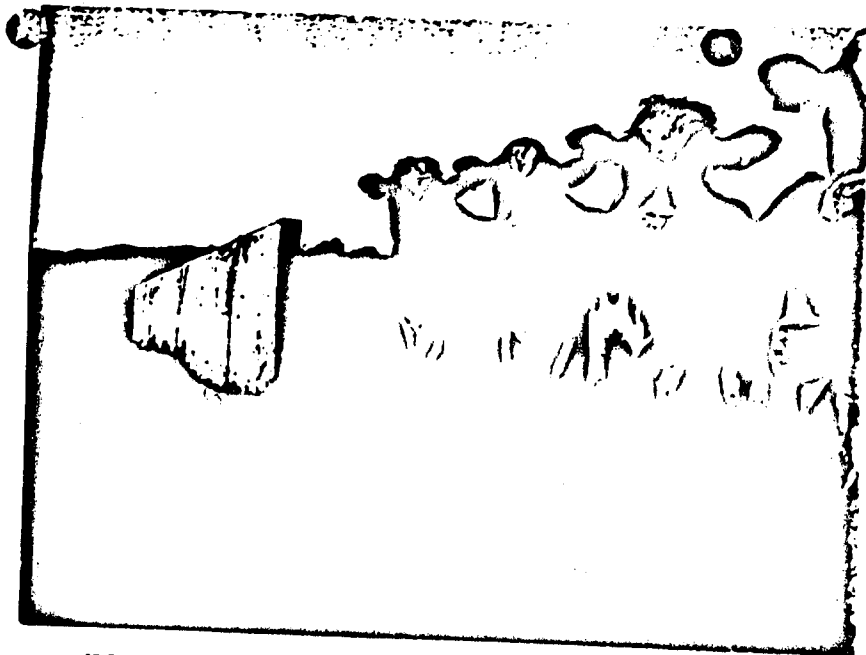
And this is Tillamook Bay on the blue Pacific, just over the evergreen Coast Range from Portland, Oregon. Unofficially, Tillamook could be called the cheddar cheese capital of the West. And once upon a time, this bay was the best little oyster bed in Oregon. Then something happened—and some people blamed it on poison runoff.

The Tillamook County Creamery Association is made up of some 175 dairy farmers working herds of Holsteins and Guernseys and Jerseys in perennially green pastures hemmed between the mountains and the bay. Most of the milk from these cows is made into Tillamook cheese, and a very good cheese it is at that. Forty million to fifty million pounds of it are shipped across the U. S. and overseas each year. Unavoidably, in the process of providing for all that cheese, the cows also provide half a million tons of waste, in the form of both urine and manure—and this in a land where annual rainfall averages 90 inches. When sustained rainfall swells the five rivers running through the pastures to Tillamook Bay, state agricultural officials shut down the bay's commercial oyster and clam beds, lest contaminated shellfish enter the marketplace. (Four small municipal sewage plants are also believed to contribute to the problem.)

Encouraged—in some cases compelled—by state and federal agents to slow the flow to the bay, dairy farmers have built manure sheds, concrete containments, and underground liquid storage tanks to hold the wastes from the rainy days. Then, during dry times, the manure can be trucked to the pastures and spread as fertilizer. "Sure," says Jewe Hayes, one of the oyster growers, "the dairy farmers will tell you they've spent thousands of dollars on containment tanks. But when a tank is full, it's not a containment anymore. Where's the waste going to go, if not into Tillamook Bay?"

But Rudy Fenk, who runs 200 milkers on his farm beside the Trask River, says: "Look. We've come a long way in the last ten years, and we still have a way to go. We've just got to keep working at it."

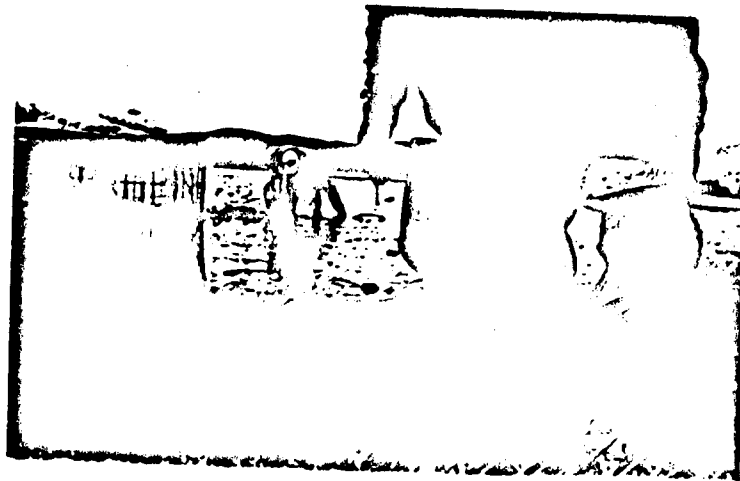
The way to go will be a long one—for Tillamook, for the West Stanislaus, for Grand Traverse Bay, and for the country. So far, the effort to control poison runoff has relied almost entirely on voluntary compliance rather than



#### UNEASY NEIGHBORS

It's a cow's life around Tillamook Bay, Oregon, where 25,000 dairy cattle produce Tillamook cheddar. They also unload some 300,000 gallons of waste a day. Exposed manure can wash into the waterway, say dairy farmers, or it can seep into the ground, polluting it at more points. Most dairy farmers have built storage tanks or covered sheds to curb runoff. Still, the bay is closed to shellfish harvesting 50 to 90 days a year because of suspected contamination.

That development has oyster growers like Mike Harris (below, at left) fuming. While some blame the dairy farms, Harris faults regulations that interrupt his harvest. "All the market we had is gone," he says. "It's frustrating."



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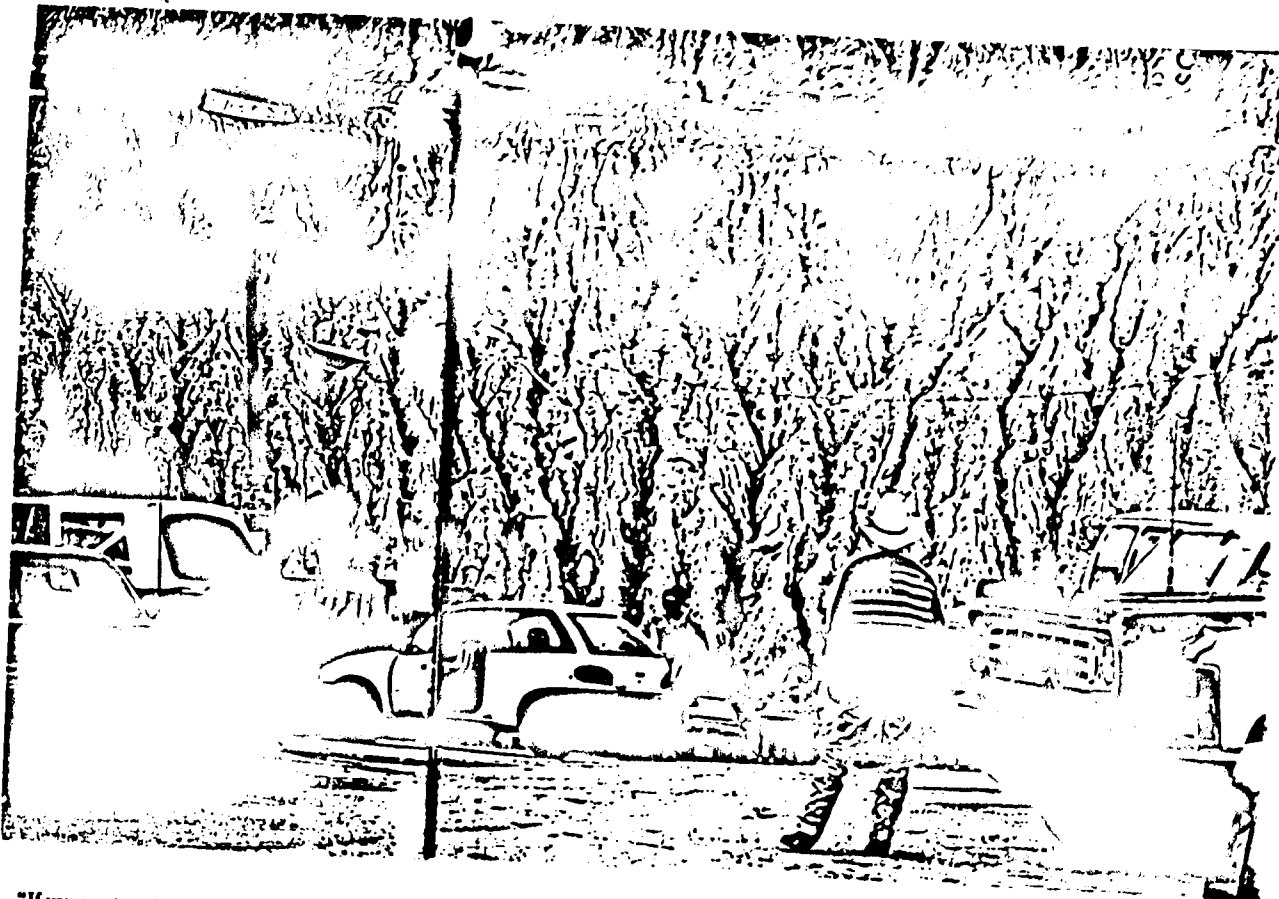
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### TRICKLE-DOWN SOLUTIONS

Monument to the glory days of gold mining in Central City, Colorado, this massive tailings pile weeps caustic tears. With each rain, its runoff carries zinc, iron, copper, and lead into streams that feed the North Fork of Clear Creek, now largely devoid of life because of heavy-metals poisoning.

Adjacent to several casinos, the pile does serve one useful purpose: a platform for a gamblers' parking lot. The pavement cap cuts tailings runoff.

Solutions to the problem of tainted runoff start with people like 14-year-old 4-H volunteer Meredith Burris (below). She stencils a drain in North Carolina to show that the trash dumped here goes untreated to the Catawba River. "People just don't know," she says. But they're starting to learn.



regulatory enforcement. Just educate the people, the advocates of this approach argue, and the people will do what is right. But will everyone? "Education alone won't do it," says Pete Bruski, the Grand Traverse County erosion-control inspector. "Of course we have to encourage people to do their part. But we have to have regulations too, because when it comes down to the uses of private property, the landowner too often thinks that good practices apply to everyone else but him."

And Peg Comfort, a Torch Lake resident and an educator at the Bellaire Middle School, says: "We look at a watershed, but we don't understand that there have to be limits. There has to be a limit to how many people can live on the land around these lakes."

"If you want quality, it means saying No. You have to learn when to say No."

To be sure, there are some harmful practices that enforceable regulations could not reasonably curb. It is not very likely, for example, that government could ever effectively halt the widespread practice of do-it-yourself rural people who change the oil in their motor vehicles, then dump the old oil on their driveways to hold down the dust. But a local government could enact zoning regulations to limit the human density around a lake—a step that at least one township abutting Torch Lake still refuses to take.

And then there is this lingering problem in the atmosphere, for what goes up the smokestack as regulated air pollution ultimately

comes down again as nonpoint-source, unregulated water pollution. Much of the fallout on the Grand Traverse region floats in from power plants, incinerators, cement kilns, and other sources scattered from Chicago west to Salt Lake City. The dirty rain contains dioxin and PCBs (polychlorinated biphenyls). Dioxin is said to be carcinogenic and is emitted in the process of incinerating municipal, medical, and hazardous wastes. PCBs can likewise be cancer-causing. Though Michigan outlawed all industrial uses of PCBs two decades ago, the substances are still found in some products that end up in incinerators upwind of Lake Michigan and Grand Traverse Bay.

One bright and sunny afternoon, under scattered powder-puff clouds, I stood on a

bluff overlooking that bay and, closer in, the northernmost end of Torch Lake. Only a thin strand separates the two. The blues of one are indescribably different from the blues of the other, and the colors of both seem always to be changing under the passing clouds.

So how—I was thinking—how will the colors stack up, say, 50 years from now? I expect both lake and bay, from this distance, will still appear blue. But on closer inspection will thick mats of algae undulate in the shallows? Will PCBs still settle to the deeps? Or might it be possible once again for an unpoisoned rain to fall, for the rivulets to run clear, for a pilgrim in a canoe to trace, with his eyes, a configuration of unsilted cobbles on the lake bottom, 40 feet down? □

*Over Polluted Runoff*

*National Geographic, February 1986*

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

100 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2154  
(714) 266-7500  
FAX: (714) 266-7600



April 3, 1996

HON. RITA VALENZUELA, MAYOR  
CITY OF MONTEREY PARK  
320 W NEWMARK AVE  
MONTEREY PARK CA 91754-2898

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

The Regional Water Quality Control Board is currently engaged in developing the terms of the draft renewal storm water/urban runoff NPDES Permit (Municipal Storm Water Permit) for Los Angeles County and its municipalities. Participants in the process include representatives from the County, the 85 cities within the County, and various other stakeholders.

Some of the most commonly asked questions we have encountered during our negotiations focus on why it is necessary to have a storm water permit, and why it is important to implement a storm water management program within the County. One obvious answer is that we need to meet the legal requirements of Federal law; however, there are other compelling reasons as well. More and more, we are finding that the environmental effects of storm water/urban runoff pollution are impacting not only coastal regions, but also inland communities. Storm water pollution has become a concern for all municipalities, and is now truly a national concern.

To provide additional background on the subject, we are enclosing the February 1996 issue of National Geographic Magazine which includes an outstanding article entitled "Our Polluted Runoff" (see page 106). This in-depth piece describes the storm water/urban runoff pollution problem which affects urban and rural areas throughout the United States. It also helps to answer some of the questions that have been posed by local city officials and program managers as to why a storm water management plan is necessary.

We are also enclosing an updated schedule for the Regional Board's consideration and adoption of the Municipal Storm Water Permit.

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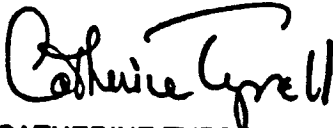
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April 3, 1996  
Page 2

As you review these materials, please keep in mind that the Regional Board is committed to working with the municipalities of Los Angeles County to develop and implement a successful storm water management program. Please circulate both this letter and the magazine to Council Members so that they too can see how serious and how extensive the urban runoff problem is, and how other communities are tackling this problem.

Should you have any questions on either the adoption schedule or the development process, please feel free to call me at (213) 266-7515. You or your staff can also contact either Xavier Swamikannu at (213) 266-7592, or Carlos Urrunaga at (213) 266-7598 for assistance.

Thank you again for taking the time to review the enclosed information, and for working so diligently with us to protect our inland and coastal waters.



**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

**attachments**

cc: Jorge León, Office of Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1995

2552

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION



101 CENTRE PLAZA DRIVE  
SAN FRANCISCO, CA 94111-2156  
(415) 246-7500  
FAX (415) 246-7600

April 3, 1996

HON. JOHN HEILMAN, MAYOR  
CITY OF WEST HOLLYWOOD  
8300 SANTA MONICA BLVD  
WEST HOLLYWOOD CA 90069-4314

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)

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April 3, 1996  
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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

**attachments**

cc: Jorge León, Office of Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

cc: tom@cap200mayor.com

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

02255



**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SANTA CLARITA, CA 91354-2154  
TEL (818) 266-7500  
FAX (818) 266-7600



April 3, 1996

HON. CARL BOYER, MAYOR  
CITY OF SANTA CLARITA  
23920 VALENCIA BLVD STE 300  
SANTA CLARITA CA 91355-2175

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
Page 2

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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

ENTRE PLAZA DRIVE  
TERRY PARK, CA 91754-2156  
(213) 266-7300  
FAX (213) 266-7600



April 3, 1996

HON. ALBERT G. PEREZ, MAYOR  
CITY OF SOUTH EL MONTE  
1415 N SANTA ANITA AVE  
SOUTH EL MONTE CA 91733-3389

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

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**Catherine Kuhlman, United States Environmental Protection Agency**  
**Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles**  
**City Municipal Storm Water Permit Contact**

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1998

02251

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
ANTERREY PARK, CA 91754-2156  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. ALBERT T. ROBLES, MAYOR  
CITY OF SOUTH GATE  
8650 CALIFORNIA AVE  
SOUTH GATE CA 90280-3075

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

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Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. TOM BREAZEAL, MAYOR  
CITY OF TEMPLE CITY  
9701 E LAS TUNAS DR  
TEMPLE CITY CA 91780-2249

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
TEL 266 7500  
FAX (213) 266-7600

April 3, 1996

HON. DOROTHY RAMIREZ, MAYOR  
CITY OF MAYWOOD  
4319 E. SLAUSON AVENUE  
MAYWOOD, CA 90270

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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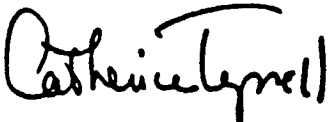
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April 3, 1996  
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Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
STEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1998

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HON. ROBERT T. BARLETT, MAYOR  
CITY OF MONROVIA  
415 S IVY AVE  
MONROVIA CA 91016-2888

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

[carlos.urrunaga@mayor.com](mailto:carlos.urrunaga@mayor.com)

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
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Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1996

0273

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

CENTRE PLAZA DRIVE  
SAN FRANCISCO, CA 94111-2156  
(415) 266-7500  
FAX: (415) 266-7600



April 3, 1996

HON. STEPHEN ALEXANDER, MAYOR  
CITY OF AZUSA  
213 E FOOTHILL BLVD  
AZUSA CA 91702-2514

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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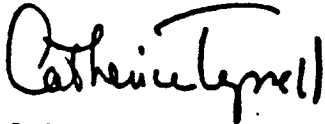
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
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Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1996

02276

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7300  
FAX (213) 266-7600



April 3, 1998

HON. GEORGE A. MAURER, MAYOR  
CITY OF SIERRA MADRE  
232 W SIERRA MADRE BLVD  
SIERRA MADRE CA 91024-0451

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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ENCLOSURE

April 3, 1996  
Page 2

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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

**attachments**

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Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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2000-07-28

R0032033

**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1996

0279



**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
STERILE PARK, CA 91734-2136  
TEL 266-7300  
FAX (213) 266-7600



April 3, 1996

HON. ISIDRO MENEZES, MAYOR  
CITY OF ARTESIA  
18747 CLARKDALE AVE  
ARTESIA CA 90701-5899

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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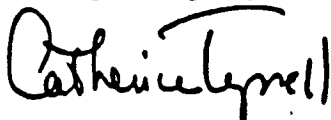
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April 3, 1996  
Page 2

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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

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Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
TERRY PARK, CA 91754-2154  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. SARA HANLON, MAYOR  
CITY OF SIGNAL HILL  
2175 CHERRY AVE  
SIGNAL HILL CA 90806-3799

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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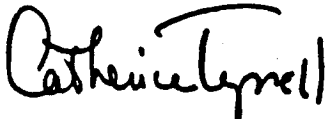
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1995

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
STEREY PARK, CA 91754-2156  
TEL 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. THOMAS M. O'LEARY, MAYOR  
CITY OF COVINA  
125 E COLLEGE ST  
COVINA CA 91723-2197

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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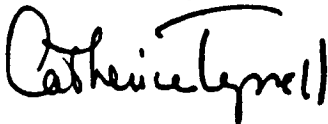
April 3, 1996  
Page 2

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Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

100 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(714) 266-7500  
FAX: (714) 266-7600



April 3, 1996

HON. ALGIRD LEIGA, MAYOR  
CITY OF CLAREMONT  
207 HARVARD AVE  
CLAREMONT CA 91711-4719

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

[www.sfwpc.org](http://www.sfwpc.org)

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

<b>ACTIVITIES</b>	<b>COMPLETION DATE</b>
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Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

1 CENTRE PLAZA DRIVE  
MOUNTAIN VIEW PARK, CA 91754-2156  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1996

**HON. PAUL W. BOWLEN, MAYOR  
CITY OF CERRITOS  
PO BOX 3130  
CERRITOS CA 90703-3130**

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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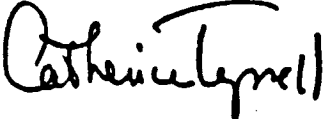
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April 3, 1996  
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City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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As of March 21, 1996

029204

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

100 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2154  
(213) 266-7300  
FAX (213) 266-7600



April 3, 1996

**HON. MARK FLEWELLING, MAYOR  
CITY OF BRADBURY  
600 WINSTON AVE  
BRADBURY CA 91010-1199**

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1995

02061

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**

**LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2134  
(213) 266-7300  
FAX (213) 266-7600



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April 3, 1996

HON. RANDY BOMGAARS, MAYOR  
CITY OF BELLFLOWER  
16600 CIVIC CENTER DR  
BELLFLOWER CA 90706-5494

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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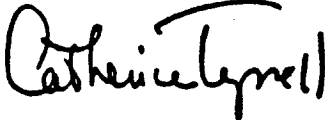
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1998

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

MONTEREY PLAZA DRIVE  
MONTEREY PARK, CA 91754-2134  
(213) 266-7300  
FAX (213) 266-7600



April 3, 1996

HON. FIDEL A. VARGAS, MAYOR  
CITY OF BALDWIN PARK  
14403 E PACIFIC AVE  
BALDWIN PARK CA 91706-4297

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

The Regional Water Quality Control Board is currently engaged in developing the terms of the draft renewal storm water/urban runoff NPDES Permit (Municipal Storm Water Permit) for Los Angeles County and its municipalities. Participants in the process include representatives from the County, the 85 cities within the County, and various other stakeholders.

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April 3, 1996  
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Thank you again for taking the time to review the enclosed information, and for working so diligently with us to protect our inland and coastal waters.



**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

**attachments**

cc: Jorge León, Office of Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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OFFICE

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1998

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
HUNTINGTON PARK, CA 91754-2154  
(619) 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. THOMAS E. JACKSON, MAYOR  
CITY OF HUNTINGTON PARK  
6550 MILES AVE RM 135  
HUNTINGTON PARK CA 90255-4338

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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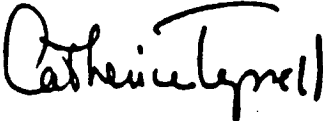
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April 3, 1996  
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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SANTERREY PARK, CA 91754-2156  
TEL (213) 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. CAROL LIU, MAYOR  
CITY OF LA CANADA FLINTRIDGE  
1327 FOOTHILL BLVD.  
LA CANADA FLINTRIDGE CA 91011-2137

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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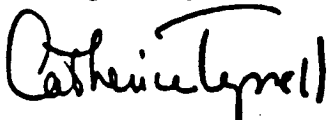
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April 3, 1996  
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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

cc: tyrr@waterboards.ca.gov

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SHERREY PARK, CA 91754-2156  
TEL 266 7500  
FAX (213) 266-7600



April 3, 1996

HON. PAUL H. RICHARDS, II, MAYOR  
CITY OF LYNWOOD  
11330 BULLIS RD  
LYNWOOD CA 90262-3693

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

**attachments**

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Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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As of March 21, 1998

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SAN JOSE, CALIF. 95128-2136  
TEL. (415) 750-7300  
FAX (415) 266-7600



April 3, 1996

HON. TALMAGE V. BURKE, MAYOR  
CITY OF ALHAMBRA  
111 S FIRST ST  
ALHAMBRA CA 91801-3796

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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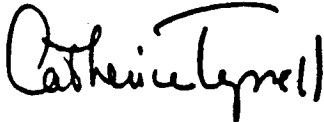
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April 3, 1996  
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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

encl: permit@blmayers.com

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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As of March 21, 1996

0315

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



101 CENTRE PLAZA DRIVE  
DUBLIN PARK, CA 91734 2154  
TELEPHONE (916) 266-7500  
FAX (916) 266-7600

April 3, 1996

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HON. MARY B. YOUNG, MAYOR  
CITY OF ARCADIA  
240 W HUNTINGTON DR  
ARCADIA CA 91007-3499

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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April 3, 1996  
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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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cc: jorgeleon@smwrc.com

**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
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Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754 2156  
266-7300  
FAX (213) 266-7600



April 3, 1996

HON. GEORGE COLE, MAYOR  
CITY OF BELL  
6330 PINE AVE  
BELL CA 90201-1291

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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April 3, 1996

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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

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**Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles**  
**City Municipal Storm Water Permit Contact**

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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As of March 21, 1998

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SAN FRANCISCO, CA 94704-2156  
TEL (415) 266-7500  
FAX (415) 266-7600



April 3, 1996

**HON. ARNOLD ALVAREZ-GLASMAN, MAYOR  
CITY OF MONTEBELLO  
1600 W BEVERLY BLVD  
MONTEBELLO CA 90640-3970**

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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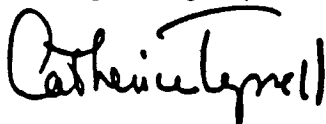
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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

**attachments**

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Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



CENTRE PLAZA DRIVE  
ATEREY PARK, CA 91754-2154  
(213) 266-7500  
FAX (213) 266-7400

April 3, 1996

HON. JUDITH BRENNAN, MAYOR  
CITY OF NORWALK  
12700 NORWALK BLVD  
NORWALK CA 90650-3182

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

The Regional Water Quality Control Board is currently engaged in developing the terms of the draft renewal storm water/urban runoff NPDES Permit (Municipal Storm Water Permit) for Los Angeles County and its municipalities. Participants in the process include representatives from the County, the 85 cities within the County, and various other stakeholders.

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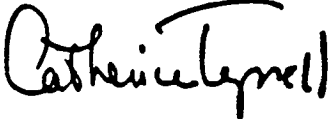
April 3, 1996

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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

LOS ANGELES REGION

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2136  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1996

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HON. WAYNE PIERCY, MAYOR  
CITY OF LAKEWOOD  
5050 N CLARK AVE  
LAKEWOOD CA 90712-2697

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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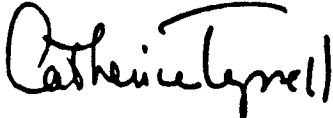
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

cc:le tyrrrell@smwps.com

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**

**LOS ANGELES REGION**

1. CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91734-2156  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. JON H. BLICKENSTAFF, MAYOR  
CITY OF LA VERNE  
3660 D STREET  
LA VERNE CA 91750-3599

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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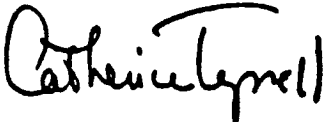
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April 3, 1996  
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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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OFFICE

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
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Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SHERBORN PARK, CA 91734-2156  
TEL: 264-7500  
FAX: (213) 264-7600



April 3, 1996

HON. MICHAEL SULLENS, MAYOR  
CITY OF WHITTIER  
13230 E PENN ST  
WHITTIER CA 90602-1772

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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○ As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2136  
(213) 266-7300  
FAX (213) 266-7600



April 3, 1996

HON. BETTY WILSON, MAYOR  
CITY OF SANTA FE SPRINGS  
11710 TELEGRAPH RD  
SANTA FE SPRINGS CA 90670-3678

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061854, CI 6948)**

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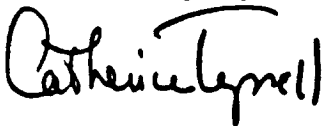
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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OFFICE

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

10000-RE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2134  
2131 266-7300  
FAX (213) 266-7600



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April 3, 1996

HON. CURTIS MORRIS, MAYOR  
CITY OF SAN DIMAS  
245 E BONITA AVE  
SAN DIMAS CA 91773-3002

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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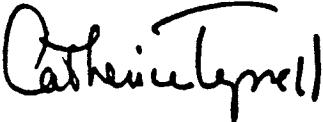
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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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As of March 21, 1996

27552

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2154  
(714) 266-7300  
FAX (714) 266-7400



April 3, 1996

HON. EDWARD S. CORTEZ, MAYOR  
CITY OF POMONA  
505 S GAREY AVE  
POMONA CA 91768-3320

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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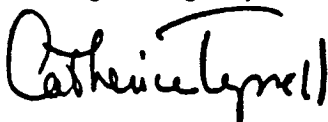


April 3, 1996  
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Surface Water Programs

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City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTREY PARK, CA 91754-2134  
Tel. 266-7300  
Fax (213) 266-7600



April 3, 1996

VOL  
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HON. PAMELA BOOTHE, MAYOR  
CITY OF HIDDEN HILLS  
6165 SPRING VALLEY ROAD  
HIDDEN HILLS, CA 91302-1257

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
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CA0061654, CI 6948)**

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April 3, 1996  
Page 2

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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

**attachments**

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Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

encl. permit@smwps.com

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1995

03348

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

CENTRE PLAZA DRIVE  
TERRY PARK, CA 91754-2156  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1996

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HON. LOUIS PEREZ, MAYOR  
CITY OF LA PUENTE  
15900 E MAIN ST  
LA PUENTE CA 91744-4788

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)

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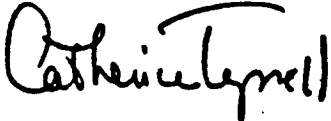
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April 3, 1996  
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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 18

As of March 21, 1998

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
TREY PARK, CA 91734-2136  
(213) 266-7300  
FAX (213) 266-7600



April 3, 1996

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HON. C. DAVID PETERS, MAYOR  
CITY OF LA MIRADA  
13700 LA MIRADA BOULEVARD  
LA MIRADA CA 90638-3099

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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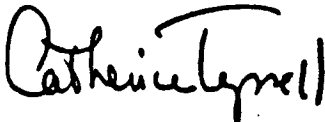
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1998

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

100 CENTRE PLAZA DRIVE  
MCCREY PARK, CA 91754-2154  
(213) 266-7300  
FAX (213) 266-7600



April 3, 1996

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HON. JOHN POWERS, MAYOR  
CITY OF LA HABRA HEIGHTS  
1245 N HACIENDA BLVD  
LA HABRA HEIGHTS CA 90631

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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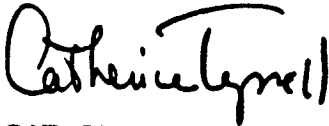
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

5 CENTRE PLAZA DRIVE  
SANTEREBY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7800



April 3, 1996

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HON. DEE HARDISON, MAYOR  
CITY OF TORRANCE  
3031 TORRANCE BLVD  
TORRANCE CA 90503-5059

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
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Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7900  
FAX (213) 266-7600



April 3, 1996

HON. JULIAN A. MIRANDA, MAYOR  
CITY OF IRWINDALE  
5050 N IRWINDALE AVE  
IRWINDALE CA 91706-2192

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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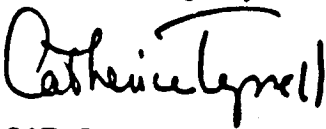
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April 3, 1996  
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Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

37577

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
266 7500  
FAX: (213) 266-7600



April 3, 1996

**HON. HENRY HARKEMA, MAYOR  
CITY OF PARAMOUNT  
16400 COLORADO AVE  
PARAMOUNT CA 90723-5050**

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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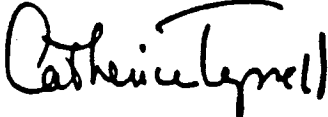
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
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Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
TEL: 266-7500  
FAX: (213) 266-7600



April 3, 1996

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HON. GARTH G. GARDENER, MAYOR  
CITY OF PICO RIVERA  
6615 S PASSONS BLVD  
PICO RIVERA CA 90660-3698

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
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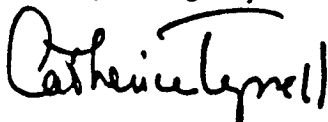


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Surface Water Programs

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City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

03599

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

100 CENTRE PLAZA DRIVE  
ALHAMBRA PARK, CA 91754-2156  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. ROBERT CANADA, MAYOR  
CITY OF HAWAIIAN GARDENS  
21815 PIONEER BLVD  
HAWAIIAN GARDENS CA 90716-1299

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

The Regional Water Quality Control Board is currently engaged in developing the terms of the draft renewal storm water/urban runoff NPDES Permit (Municipal Storm Water Permit) for Los Angeles County and its municipalities. Participants in the process include representatives from the County, the 85 cities within the County, and various other stakeholders.

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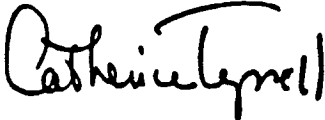
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April 3, 1996  
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Thank you again for taking the time to review the enclosed information, and for working so diligently with us to protect our inland and coastal waters.



**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

**attachments**

cc: Jorge León, Office of Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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OFFICE

**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

CENTRE PLAZA DRIVE  
SANTERREY PARK, CA 91754-2154  
(213) 264-7500  
FAX: (213) 264-7400



April 3, 1996

HON. JOHN FERRERO, MAYOR  
CITY OF INDUSTRY  
15651 E STAFFORD ST  
INDUSTRY CA 91744-3995

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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OFFICE

April 3, 1996  
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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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mailto:tyrrell@mayors.com

**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1996

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

1700 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7300  
FAX: (213) 266-7600



April 3, 1996

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HON. PHYLLIS R. REYES, MAYOR  
CITY OF DUARTE  
1600 HUNTINGTON DR  
DUARTE CA 91010-2592

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)

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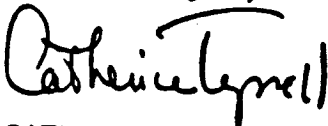
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

03730

As of March 21, 1996

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

LOS ANGELES REGION

31 CENTRE PLAZA DRIVE  
ONTREY PARK, CA 91754-2154  
(714) 266-7500  
AL (714) 266-7600



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April 3, 1996

HON. LARRY GLENN, MAYOR  
CITY OF GLENDORA  
116 E FOOTHILL BLVD  
GLENDORA CA 91740-3380

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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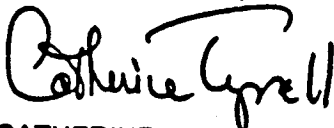
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April 3, 1996  
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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
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Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1996

038320

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

01 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
213) 266-7500  
AX (213) 266-7600



April 3, 1996

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HON. LARRY GLENN, MAYOR  
CITY OF GLENDORA  
116 E FOOTHILL BLVD  
GLENDORA CA 91740-3380

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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ENCLOSURE

April 3, 1996  
Page 2

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Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

[cmwp.permit@prl@mayors.com](mailto:cmwp.permit@prl@mayors.com)

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

0385

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



16 CENTRE PLAZA DRIVE  
MIRAGE PARK, CA 91754-2134  
(213) 266-7500  
FAX (213) 266-7600

April 3, 1996

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HON. GARY P. MCCAUGHAN, MAYOR  
CITY OF DOWNEY  
11111 BROOKSHIRE AVE  
DOWNEY CA 90241-3898

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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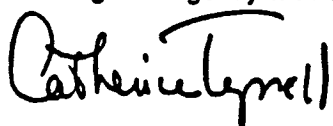
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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- Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles
- City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

07887

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

150 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2154  
(213) 266-7300  
FAX (213) 266-7400



April 3, 1996

HON. EILEEN ANSARI, MAYOR  
CITY OF DIAMOND BAR  
21660 E COPLEY DR STE 100  
DIAMOND BAR CA 91765-4177

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
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As of March 21, 1998

030903

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
BERKELEY PARK, CA 91734-2156  
266 7500  
FAX (213) 266-7600



April 3, 1996

HON. DONALD L. DEAR, MAYOR  
CITY OF GARDENA  
1700 W 162ND ST  
GARDENA CA 90247-3778

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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Surface Water Programs

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- Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board
- Catherine Kuhlman, United States Environmental Protection Agency
- Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles
- City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE

SAN JOSE, CALIFORNIA 95128-2156

TEL (415) 266-7500

FAX (415) 266-7600



April 3, 1996

HON. LARRY GUIDI, MAYOR  
CITY OF HAWTHORNE  
4455 W 126TH ST  
HAWTHORNE CA 90250-4482

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

The Regional Water Quality Control Board is currently engaged in developing the terms of the draft renewal storm water/urban runoff NPDES Permit (Municipal Storm Water Permit) for Los Angeles County and its municipalities. Participants in the process include representatives from the County, the 85 cities within the County, and various other stakeholders.

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VOL 9

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April 3, 1996  
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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
DUBLIN PARK, CA 91734-2136  
TEL (916) 266-7500  
FAX (916) 266-7600



April 3, 1996

HON. EDWARD VINCENT, MAYOR  
CITY OF INGLEWOOD  
ONE MANCHESTER BLVD  
INGLEWOOD CA 90301-1750

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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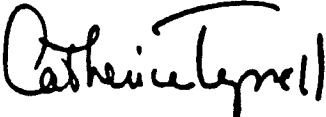
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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
DREY PARK, CA 91734 2156  
TEL. 266-7500  
FAX (213) 266-7600



April 3, 1996

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HON. HAROLD E. HOFFMAN, MAYOR  
CITY OF LAWDALE  
14717 BURIN AVE  
LAWDALE CA 90260-1497

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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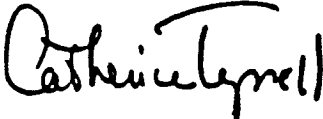
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Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
PETEREY PARK, CA 91734-2136  
TEL: (213) 246-7300  
FAX: (213) 246-7600



April 3, 1996

HON. LAWSON PEDIGO, MAYOR  
CITY OF LOMITA  
24300 NARBONNE AVE  
LOMITA CA 90717-1198

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SHERY PARK, CA 91754 2154  
266 7500  
FAX (213) 266-7600



April 3, 1996

HON. ED CORRIDORI, MAYOR  
CITY OF AGOURA HILLS  
30101 AGOURA CRT STE 102  
AGOURA HILLS CA 91301-2003

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
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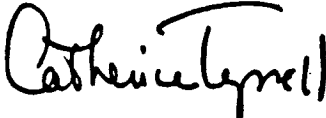
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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



101 CENTRE PLAZA DRIVE  
BERKELEY PARK, CA 91754-2154  
266-7500  
FAX (213) 266-7600

April 3, 1996

HON. DENNIS WASHBURN, MAYOR  
CITY OF CALABASAS  
26135 MUREAU RD  
CALABASAS CA 91302

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
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City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

101 CENTRE PLAZA DRIVE  
BERKELEY PARK, CA 91754-2156  
TEL: 266-7300  
FAX: (213) 266-7600



April 3, 1996

HON. JOAN HOUSE, MAYOR  
CITY OF MALIBU  
23555 CIVIC CENTER WAY  
MALIBU CA 90265-4865

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
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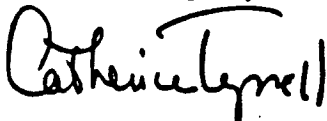
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City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SAN JOSE, CALIFORNIA 95128-2156  
TEL (415) 264-7300  
FAX (415) 264-7600



April 3, 1996

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HON. JAMES EMMONS, MAYOR  
CITY OF WESTLAKE VILLAGE  
4373 PARK TERRACE  
WESTLAKE VILLAGE, CA 91361-4361

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
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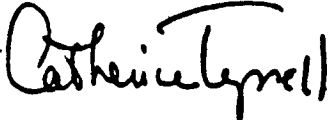
April 3, 1996  
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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

**attachments**

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- Catherine Kuhlman, United States Environmental Protection Agency
- Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles
- City Municipal Storm Water Permit Contact

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LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SANITARY PARK, CA 91754-2156  
TEL: (213) 266-7500  
FAX: (213) 266-7600



April 3, 1996

HON. MICHAEL I. MITOMA, MAYOR  
CITY OF CARSON  
701 E CARSON ST  
CARSON CA 90745-2224

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1998

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SAN FRANCISCO, CA 94111-2156  
TEL: (415) 266-7300  
FAX: (415) 266-7600



April 3, 1996

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HON. GODFREY PERNELL, MAYOR  
CITY OF ROLLING HILLS  
2 PORTUGUESE BEND RD  
ROLLING HILLS CA 90274-5199

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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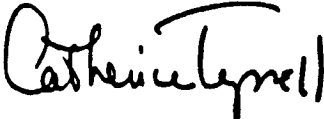
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April 3, 1996  
Page 2

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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SAN FRANCISCO, CA 94704-2136  
TELEPHONE (415) 266-7500  
FAX (415) 266-7600



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April 3, 1996

HON. ROBERT BECK, MAYOR  
CITY OF ROLLING HILLS ESTATES  
4045 PALOS VERDES DR NORTH  
ROLLING HILLS ESTATES CA 90274-2596

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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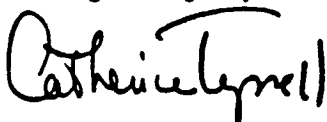
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
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Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SANTERREY PARK, CA 91734-2134  
266 7500  
FAX (213) 266-7600



April 3, 1996

HON. PAUL ROSENSTEIN, MAYOR  
CITY OF SANTA MONICA  
1685 MAIN ST.  
SANTA MONICA CA 90401-3295

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
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Assistant Executive Officer  
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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

00428

**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1995

03426

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91734-2136  
(714) 266-7500  
FAX (714) 266-7600



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April 3, 1996

HON. JUNE WENTWORTH, MAYOR  
CITY OF WALNUT  
21201 LA PUENTE RD  
WALNUT CA 91789-2018

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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As of March 21, 1995

03470

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SANTERREY PARK, CA 91754-2134  
(31) 266-7500  
FAX (213) 266-7600



April 3, 1996

**HON. STEVE HERFERT, MAYOR  
CITY OF WEST COVINA  
P.O. BOX 1440  
WEST COVINA CA 91793-1440**

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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Assistant Executive Officer  
Surface Water Programs

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City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(31) 266-7500  
FAX (213) 266-7600



April 3, 1996

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HON. LEONIS C. MALBURG, MAYOR  
CITY OF VERNON  
4305 S SANTA FE AVE  
VERNON CA 90058-1786

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
 MONTEREY PARK, CA 91754-2156  
 (916) 266-7500  
 FAX (916) 266-7600



April 3, 1996

HON. JOHN BOWLER, MAYOR  
 CITY OF HERMOSA BEACH  
 1315 VALLEY DRIVE  
 HERMOSA BEACH CA 90254-3814

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
 STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
 CA0061654, CI 6948)**

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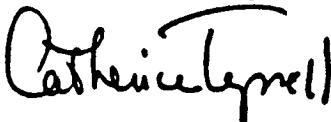


April 3, 1996  
Page 2

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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

**attachments**

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**Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles**  
**City Municipal Storm Water Permit Contact**

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
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Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1996

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION



101 CENTRE PLAZA DRIVE  
SANTEFE PARK, CA 91754-2154  
(213) 266-7300  
FAX (213) 266-7600

April 3, 1996

HON. RICHARD J. RIORDAN, MAYOR  
CITY OF LOS ANGELES  
200 N. SPRING STREET  
LOS ANGELES CA 90012-4801

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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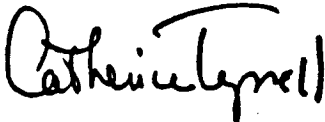
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April 3, 1996  
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Surface Water Programs

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**City Municipal Storm Water Permit Contact**

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



101 CENTRE PLAZA DRIVE  
SANTERREY PARK, CA 91754-2154  
(611) 264-7500  
FAX (213) 264-7600

April 3, 1996

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HON. STEVE BARNES, MAYOR  
CITY OF MANHATTAN BEACH  
1400 HIGHLAND AVENUE  
MANHATTAN BEACH CA 90266-4795

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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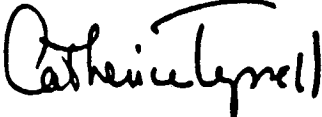
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Assistant Executive Officer  
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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
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As of March 21, 1998

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



101 CENTRE PLAZA DRIVE  
SAN FRANCISCO, CA 94111-2156  
(415) 266-7500  
FAX (415) 266-7600

April 3, 1996

**HON. RAYMOND MATTINGLY, MAYOR  
CITY OF PALOS VERDES ESTATES  
340 PALOS VERDES DR., WEST  
PALOS VERDES ESTATES, CA 90274**

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
BERKELEY PARK, CA 91754-2154  
(213) 266 7300  
FAX (213) 266 7600



April 3, 1996

HON. MARILYN LYON, MAYOR  
CITY OF RANCHO PALOS VERDES  
30940 HAWTHORNE BLVD  
RANCHO PALOS VERDES CA 90274-5391

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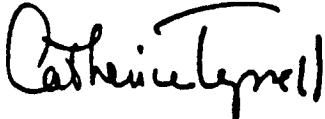
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City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
JERREY PARK, CA 91754-2156  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. BRAD PARTON, MAYOR  
CITY OF REDONDO BEACH  
415 DIAMOND ST  
REDONDO BEACH CA 90277-2894

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
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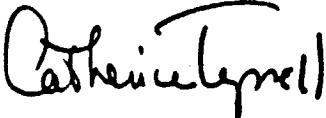
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City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

100 CENTRE PLAZA DRIVE  
DUBLIN PARK, CA 91754-2156  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. RICK REYES, MAYOR  
CITY OF GLENDALE  
613 E BROADWAY RM 205  
GLENDALE CA 91206-4388

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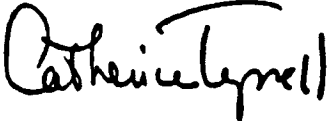
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MUNICIPAL STORM WATER DISCHARGE PERMIT  
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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
SAN FRANCISCO, CA 94111-2134  
(415) 266-7500  
FAX (415) 266-7600



April 3, 1996

HON. STEVEN GOURLEY, MAYOR  
CITY OF CULVER CITY  
9770 CULVER BOULEVARD  
CULVER CITY CA 90232-0507

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
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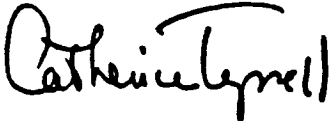
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**LOS ANGELES COUNTY  
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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



121 CENTRE PLAZA DRIVE  
BERKELEY PARK CA 91754 2134  
(415) 266-7500  
FAX (213) 266-7600

April 3, 1996

HON. ALLAN ALEXANDER, MAYOR  
CITY OF BEVERLY HILLS  
450 N. CRESCENT DRIVE  
BEVERLY HILLS CA 90210-4854

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

The Regional Water Quality Control Board is currently engaged in developing the terms of the draft renewal storm water/urban runoff NPDES Permit (Municipal Storm Water Permit) for Los Angeles County and its municipalities. Participants in the process include representatives from the County, the 85 cities within the County, and various other stakeholders.

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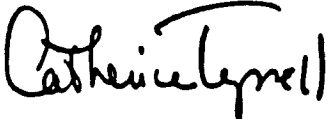


April 3, 1996  
Page 2

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Thank you again for taking the time to review the enclosed information, and for working so diligently with us to protect our inland and coastal waters.



CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

**attachments**

cc: Jorge León, Office of Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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cc: Jorge León, Office of Chief Counsel, State Water Resources Control Board

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

1 CENTRE PLAZA DRIVE  
SANTERREY PARK, CA 91754-2154  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. CARL JACOBSON, MAYOR  
CITY OF EL SEGUNDO  
350 MAIN ST  
EL SEGUNDO CA 90245-3895

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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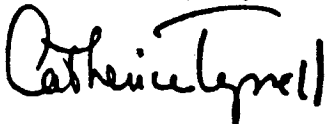
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April 3, 1996  
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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SAN TEREY PARK, CA 91754-2154  
TEL 266 7500  
FAX (213) 266-7600



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April 3, 1996

HON. MARIA CHACON, MAYOR  
CITY OF BELL GARDENS  
7100 S GARFIELD AVE  
BELL GARDENS CA 90201-3293

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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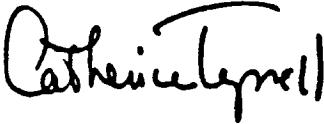
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April 3, 1996  
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Assistant Executive Officer  
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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

00470

**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

121 CENTRE PLAZA DRIVE  
BERKELEY PARK, CA 91734-2134  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1996

**HON. DAVE GOLONSKI, MAYOR  
CITY OF BURBANK  
275 E OLIVE AVE  
BURBANK CA 91502-1267**

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

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Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

[smwp.permit@prb.org](mailto:smwp.permit@prb.org)

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

00444

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION



101 CENTRE PLAZA DRIVE  
SAN FRANCISCO, CA 94754-2156  
(415) 266-7500  
FAX (415) 266-7600

April 3, 1996

HON. ARTEMIO E. NAVARRO, MAYOR  
CITY OF COMMERCE  
2535 COMMERCE WAY  
COMMERCE CA 90040-1487

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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April 3, 1996  
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Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

0477

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SAN JOSE PARK, CA 91734-2134  
(415) 244-7300  
FAX (415) 244-7600



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HON. OMAR BRADLEY, MAYOR  
CITY OF COMPTON  
205 S WILLOWBROOK AVE  
COMPTON CA 90220-3190

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1995

004800

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2154

(916) 266-7500  
(213) 266-7600



April 3, 1996

HON. ALEX F. RODRIGUEZ, MAYOR  
CITY OF CUDAHY  
5220 SANTA ANA STREET  
CUDAHY, CA 90201

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
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Assistant Executive Officer  
Surface Water Programs

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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

only verandapf@mayors.com

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156

☎ 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. PATRICIA A. WALLACH, MAYOR  
CITY OF EL MONTE  
11333 VALLEY BLVD  
EL MONTE CA 91731-3283

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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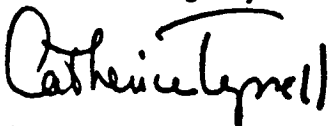
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Surface Water Programs

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- cc: Jorge León, Office of Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

cc: [illegible]

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1998

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
TERRY PARK, CA 91754-2156  
(714) 266-7300  
FAX (714) 266-7600



April 3, 1996

HON. BERNARD LASAGE, MAYOR  
CITY OF SAN MARINO  
2200 HUNTINGTON DR  
SAN MARINO CA 91108-2691

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

The Regional Water Quality Control Board is currently engaged in developing the terms of the draft renewal storm water/urban runoff NPDES Permit (Municipal Storm Water Permit) for Los Angeles County and its municipalities. Participants in the process include representatives from the County, the 85 cities within the County, and various other stakeholders.

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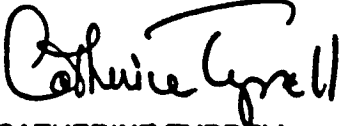
April 3, 1996

Page 2

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Thank you again for taking the time to review the enclosed information, and for working so diligently with us to protect our inland and coastal waters.



**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

**attachments**

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Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

[tyrrell@wprmc.org](mailto:tyrrell@wprmc.org)

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1995

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
DUBLIN PARK, CA 91734-2134  
TEL 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. JOE VASQUEZ, MAYOR  
CITY OF ROSEMEAD  
8838 VALLEY BLVD  
ROSEMEAD CA 91770-1787

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

**attachments**

cc: Jorge León, Office of Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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only for use by the City of Los Angeles

R0032246

**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



171 CENTRE PLAZA DRIVE  
SANTERREY PARK, CA 91734-2156  
(213) 266-7300  
FAX: (213) 266-7600

April 3, 1996

HON. PAUL ZEE, MAYOR  
CITY OF SOUTH PASADENA  
1414 MISSION ST  
SOUTH PASADENA CA 91030-3298

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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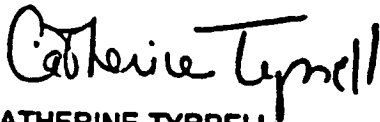
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April 3, 1996  
Page 2

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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

**attachments**

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Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1995

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

Q CENTRE PLAZA DRIVE  
TERRY PARK, CA 91754-2136  
(213) 266-7500  
FAX (213) 266-7600



April 3, 1996

HON. HARRY BALDWIN, MAYOR  
CITY OF SAN GABRIEL  
532 W MISSION DR  
SAN GABRIEL CA 91776-1202

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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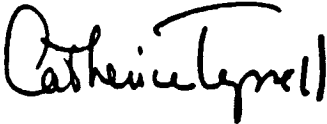
April 3, 1996

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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

**attachments**

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Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SAN FERNANDO PARK, CA 91734-2156  
TEL: (818) 266-7500  
FAX: (818) 266-7600



April 3, 1996

HON. JOANNE BALTIERREZ, MAYOR  
CITY OF SAN FERNANDO  
117 MACNEIL ST  
SAN FERNANDO CA 91340-2993

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
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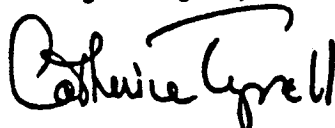
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April 3, 1996  
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Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

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As of March 21, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



101 CENTRE PLAZA DRIVE  
SAN PABLO PARK, CA 91754-2136  
(415) 266-7500  
FAX (415) 266-7600

April 3, 1996

HON. WILLIAM M. PAPARIAN, MAYOR  
CITY OF PASADENA  
100 N GARFIELD AVE RM 212  
PASADENA CA 91101-7215

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT FOR LOS ANGELES COUNTY (NPDES No.  
CA0061654, CI 6948)**

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April 3, 1996  
Page 2

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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

**attachments**

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Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Don Wolfe, Deputy Director, Department of Public Works, County of Los Angeles  
City Municipal Storm Water Permit Contact

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
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Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 21, 1996

050504

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600



March 22, 1996

Mr. Donald Wolfe, Deputy Director  
Department of Public Works  
County of Los Angeles  
900 So. Fremont Avenue  
Alhambra, CA 91803-1331

**REPORT OF STORM WATER MONITORING UNDER NATIONAL POLLUTANT  
DISCHARGE ELIMINATION SYSTEM MUNICIPAL STORM WATER DISCHARGE  
PERMIT FOR LOS ANGELES COUNTY (NPDES No. CA0061654, CI 6948)**

We received your submittal titled *Report of Stormwater Monitoring Winter 1994-1995* on March 21, 1996. Upon cursory review, it appears that the information contained within the Document could be further summarized and distributed to the Los Angeles County Permittees and members of the public for their information. I hope that you agree with the idea of a broader distribution.

Due to the very fine print contained within the document, we request that two (2) additional copies be provided to the Regional Board. Additionally, we request that the data also be provided on 3 1/2 inch computer disk in a general database format.

If you have any questions regarding this request please call me at (213) 266-7515 or have your staff contact Carlos Urrunaga at (213) 266-7598.

CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

cc: Jorge León, Office of Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency  
Los Angeles County Permittees

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MR GEORGE GHEBRANIOUS  
CALTRANS/DISTRICT 7  
120 S SPRING ST  
ANGELES CA 90012-3684

MR ED OTSUKA  
CITY OF BEVERLY HILLS  
9298 W THIRD ST  
BEVERLY HILLS CA 90210-3712

MS PAM KEYES  
CITY OF CULVER CITY  
4095 OVERLAND AVE  
CULVER CITY CA 90232-3731

MR ED SCHRODER  
CITY OF EL SEGUNDO  
350 MAIN ST  
EL SEGUNDO CA 90245-3895

MS AMY AMIRANI  
CITY OF HERMOSA BEACH  
1315 VALLEY DR  
HERMOSA BEACH CA 90254-3884

MR MICHAEL KANTOR  
CITY OF LOS ANGELES  
650 S SPRING ST 7TH FLOOR  
LOS ANGELES CA 90014-1952

MR NEIL MILLER  
CITY OF MANHATTAN BEACH  
3621 BELL AVE  
MANHATTAN BEACH CA 90266-3459

MS HEATHER WURTZ  
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371 VAN NESS WAY STE 200  
TORRANCE CA 90501-6220

MS VERONICA DOLLESCHER  
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30940 HAWTHORNE BLVD  
RANCHO PALOS VERDES CA 90274-6391

MS MAUREEN J LULL  
CITY OF REDONDO BEACH  
415 DIAMOND ST  
REDONDO BEACH CA 90277-2894

MS LOLA UNGAR  
CITY OF ROLLING HILLS  
2 PORTUGUESE BEND RD  
ROLLING HILLS CA 90274-6199

MR SAM WISE  
CITY OF ROLLING HILLS ESTATES  
4046 PALOS VERDES DR NORTH  
ROLLING HILLS ESTATES CA 90274-2696

MR BILL BUOL  
CITY OF SANTA MONICA  
1685 MAIN ST  
SANTA MONICA CA 90401-3295

MS SHARON PERLSTEIN  
CITY OF WEST HOLLYWOOD  
8611 SANTA MONICA BLVD  
WEST HOLLYWOOD CA 90069-4182

MS NANCY DELANGE  
CITY OF SANTA CLARITA  
23920 VALENCIA BLVD STE 300  
SANTA CLARITA CA 91355-2178

MR MANNY J MAGANA  
ASSISTANT CITY MANAGER  
CITY OF ALHAMBRA  
111 S FIRST ST  
ALHAMBRA CA 91801-3796

MR MOHAMMAD MOSTAHKAMI  
ASSISTANT CITY ENGINEER  
CITY OF ARCADIA  
240 W HUNTINGTON DR  
ARCADIA CA 91007-3499

MS ANNETTE PEREZ  
DIR. DEVELOPMENT SERV.  
CITY OF BELL  
6330 PINE AVE  
BELL CA 90201-1291

MR WILLIAM C PAGETT  
CITY ENGINEER  
CITY OF BELL GARDENS  
7100 S GARFIELD AVE  
BELL GARDENS CA 90201-3293

MR ORA LAMPMAN  
PUBLIC WORKS DIRECTOR  
CITY OF BURBANK  
275 E OLIVE AVE  
BURBANK CA 91502-1267

MR SAMUEL S JOHNSON  
PUBLIC WORKS DIRECTOR  
CITY OF COMMERCE  
2535 COMMERCE WAY  
COMMERCE CA 90040-1487

MR DANTE SEGUNDO  
ACTG. DIR. PUBLIC WORKS  
CITY OF COMPTON  
205 S WILLOWBROOK AVE  
COMPTON CA 90220-3190

MR NAS NAGAMI  
ENGINEERING MANAGER  
CITY OF CUDAHY  
C/O TIERRA ENGINEERING CO  
5525 OAKDALE AVE #180  
WOODLAND HILLS CA 91364-2814

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CITY ENGINEER  
CITY OF EL MONTE  
11333 VALLEY BLVD  
EL MONTE CA 91731-3293

MS LUCIEM J LEBLANC  
PRINCIPAL CIVIL ENGINEER  
CITY OF GLENDALE  
ENGINEERING SECTION  
633 E BROADWAY RM 206  
GLENDALE CA 91204-4388

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PROJECT MANAGER  
CITY OF HIDDEN HILLS  
371 VAN NESS WAY STE 200  
TORRANCE CA 90501-6227

MR PATRICK FU  
ASSISTANT CITY ENGINEER  
CITY OF HUNTINGTON PARK  
6550 MILES AVE RM 135  
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MR FULLMER CHAPMAN  
DIR. PUBLIC WORKS  
CITY OF LA CANADA FLINTRIDGE  
1327 FOOTHILL BLVD  
LA CANADA FLINTRIDGE CA 91011-2137

MS BARBARA MUNOZ  
SENIOR CIVIL ENGINEER  
CITY OF LONG BEACH  
333 W OCEAN BLVD 9TH FL  
LONG BEACH CA 90802-4664

MR EMILIO M MURGA  
DIRECTOR OF PUBLIC WORKS  
CITY OF LYNWOOD  
11330 BULLIS RD  
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MR MAS HAGAMI  
ENGINEER MANAGER  
CITY OF MAYWOOD  
C/O TIERRA ENGINEERING CO  
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CITY ENGINEER  
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MONTEREY PARK CA 91754-2896

MR FRED WICKMAN  
DEPUTY CITY ENGINEER  
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ROSEMEAD CA 91770-1787

MS MAYA MOUAWAD  
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( )  
MR JOHN HYATT  
PUBLIC WORKS SUPERINTENDENT  
CITY OF TEMPLE CITY  
9701 E LAS TUNAS DR  
TEMPLE CITY CA 91780-2249

MR DALE E LIPP  
CITY OF CALABASAS  
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CALABASAS CA 91302

MR ALEX SHEYDAYI  
VENTURA COUNTY  
800 S VICTORIA AVE  
VENTURA CA 93009-0001

MR CHARLES D HERBERTSON  
CITY OF HAWTHORNE  
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HAWTHORNE CA 90250-4482

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PUBLIC WORKS COORDINATOR  
CITY OF LOMITA  
4300 NARBONNE AVE  
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MR ROBERT BAMMES  
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CITY OF MONROVIA  
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PUBLIC WORKS DIRECTOR  
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SIERRA MADRE CA 91024-2312

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SOUTH GATE CA 90280-3075

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ACTG DIR OF COMMUNITY SRVS  
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CITY MANAGER  
CITY OF MALIBU  
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MALIBU CA 90265-4865

MR JOHN J WISZ  
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MR RICHARD KENNON  
CITY OF INGLEWOOD  
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INGLEWOOD CA 90301-1750

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3031 TORRANCE BLVD  
TORRANCE CA 90503-5059

MR CARLOS DILLON  
ASSISTANT ENGINEER  
CITY OF MONTEBELLO  
1600 W BEVERLY BLVD  
MONTEBELLO CA 90640-3970

MR BILL SATO  
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PASADENA CA 91101-7218

MR DOUG BENASH  
ASSOCIATE CITY ENGINEER  
CITY OF SAN GABRIEL  
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SAN GABRIEL CA 91776-1202

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SIGNAL HILL CA 90806-3799

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AGOURA HILLS CA 91301-2003

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C/O WILDAN ASSOCIATES  
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1717 W 162ND ST  
GARDENA CA 90247-3778

MR MIKE SHAHBAKHTI  
CITY OF LAWNSDALE  
14717 BURIN AVE  
LAWNSDALE CA 90260-1497

MS MARIA LLOYD  
DEPUTY CITY MANAGER  
CITY OF ARTESIA  
18747 CLARKDALE AVE  
ARTESIA CA 90701-5899

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MR NASSER ABBASZADEH  
CITY OF AZUSA  
213 E FOOTHILL BLVD  
AZUSA CA 91702-2514

MR SID JALAL MOUSAVI  
DIR. PUBLIC WORKS  
CITY OF BALDWIN PARK  
14403 E PACIFIC AVE  
BALDWIN PARK CA 91706-4297

MR MIKE EGAN  
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BELLFLOWER CA 90706-5494

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CITY ENGINEER  
CITY OF BRADBURY  
600 WINSTON AVE  
BRADBURY CA 91010-1199

MR HAL ARBOGAST  
ASSISTANT CITY ENGINEER  
CITY OF CERRITOS  
PO BOX 3130  
CERRITOS CA 90703-3130

MR CRAIG BRADSHAW  
CITY ENGINEER  
CITY OF CLAREMONT  
207 HARVARD AVE  
CLAREMONT CA 91711-4719

MR WAYNE DOWDEY  
ENVIRONMENTAL SERVICES DIRECTOR  
CITY OF COVINA  
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COVINA CA 91723-2199

MR DAVID G LIU  
CITY OF DIAMOND BAR  
21660 E COPLEY DR STE 100  
DIAMOND BAR CA 91765-4177

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CITY OF DOWNEY  
11111 BROOKSHIRE AVE  
DOWNEY CA 90241-0607

MR STEVE ESBENSHADE  
PUBLIC WORKS COORDINATOR  
CITY OF DUARTE  
1600 HUNTINGTON DR  
DUARTE CA 91010-2592

MR BRAD MILLER  
CE ASSOCIATE  
CITY OF GLENDORA  
116 E FOOTHILL BLVD  
GLENDORA CA 91740-3300

MR BRUCE LEACH  
CITY OF HAWAIIAN GARDENS  
21815 PIONEER BLVD  
HAWAIIAN GARDENS CA 90716-1299

MR JOHN KAO  
CITY OF INDUSTRY  
15651 E STAFFORD ST  
INDUSTRY CA 91744-3996

MR CARLOS ALVARADO  
CITY ENGINEER  
CITY OF IRWINDALE  
5050 N IRWINDALE AVE  
IRWINDALE CA 91706-2192

MR DAVID GILBERTSON  
CITY OF LA HABRA HEIGHTS  
1245 N HACIENDA BLVD  
LA HABRA HEIGHTS CA 90631-2579

MR BRIAN MCCLURE  
CITY OF LA MIRADA  
ENVIRONMENTAL SERVICES DEPT  
15515 PHOEBE AVE  
LA MIRADA CA 90638-5212

MR GREG AMATCHIA  
CITY OF LA PUENTE  
15900 E MAIN ST  
LA PUENTE CA 91744-4788

MR DANIEL KEESEY  
CITY OF LA VERNE  
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LA VERNE CA 91750-3599

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DIR. PUBLIC WORKS  
CITY OF LAKEWOOD  
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LAKEWOOD CA 90712-2697

MR ERNIE GARCIA  
DEPUTY CITY MANAGER  
CITY OF NORWALK  
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NORWALK CA 90650-3182

MR ENRIQUE ACEVEDO  
DIR. PUBLIC WORKS  
CITY OF PICO RIVERA  
6615 S PASSONS BLVD  
PICO RIVERA CA 90660-3698

MR GLENN K LEWIS  
CITY OF POMONA  
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POMONA CA 91766-3320

MS ROSEMARIE SMITH  
ADMINISTRATIVE TECHNOLOGIAN  
CITY OF SAN DIMAS  
245 E BONITA AVE  
SAN DIMAS CA 91773-3002

MR JOHN PRICE  
DIR. PUBLIC WORKS  
CITY OF SANTA FE SPRINGS  
11710 TELEGRAPH RD  
SANTA FE SPRINGS CA 90670-3679

MR JACK ISTIK  
CITY OF WALNUT  
21201 LA PUENTE RD  
WALNUT CA 91789-2018

MR THOMAS MAYOR  
CITY OF WEST COVINA  
1444 W GAREY AVE RM 215  
WEST COVINA CA 91790-2144

MR LEON YEHUDA  
ASSISTANT DIR. PUBLIC WORKS  
CITY OF WHITTIER  
13230 E PENN ST  
WHITTIER CA 90602-1772

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

LOS ANGELES REGION

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2136  
(213) 266-7500  
FAX: (213) 266-7600



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March 20, 1996

Mr. John R. Mundy  
Utilities Manager  
City of Santa Monica  
1212 Fifth Street, 3rd Floor  
Santa Monica, CA 90401

LOS ANGELES COUNTY MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE CHANGE

It was a pleasure meeting you at the City and County Engineers Association meeting two weeks ago. At that time you requested the newly revised schedule for the Los Angeles County Municipal Storm Water Discharge Permit. Attached is the revised schedule for your information.

The updated schedule will be mailed shortly to the official storm water contact for each Permittee. If you should have any questions please feel free to call me at (213) 266-7515 or have your staff call either Xavier Swamikannu at (213) 266-7592 or Carlos Urunaga at (213) 266-7598.

*Catherine*

CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

attachment

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**LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE**

ACTIVITIES	COMPLETION DATE
Regional Board Staff Study Session with Regional Board Members	April 1
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit.	July 15

As of March 15, 1996

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

LOS ANGELES REGION

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2136  
(213) 266-7300  
FAX: (213) 266-7600



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March 20, 1996

Mr. Marcelino M. Martinez, P.E.  
Principal Civil Engineer  
City of Glendale  
633 East Broadway, Room 205  
Glendale, CA 91206-4388

**LOS ANGELES COUNTY MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE CHANGE**

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CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

attachment

0511

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LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE

ACTIVITIES	COMPLETION DATE
Regional Board Staff Study Session with Regional Board Members	April 1
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
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Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 15, 1996

05-1-2

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
SANTERREY PARK, CA 91754-2136  
(213) 266-7500  
FAX: (213) 266-7600



March 20, 1998

Mr. Robert Rugroden  
Office Engineer  
City of Downey  
P.O. Box 7016  
Downey, CA 90241-7016

**LOS ANGELES COUNTY MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE CHANGE**

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**CATHERINE TYRRELL**  
Assistant Executive Officer  
Surface Water Programs

attachment

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05-1-98

LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE

ACTIVITIES	COMPLETION DATE
Regional Board Staff Study Session with Regional Board Members	April 1
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
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Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 15, 1996

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
TEL (213) 266-7500  
FAX (213) 266-7600



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March 20, 1998

Mr. Gerald E. Greene, D.Env.  
Associate Planner  
Boyle Engineering Corporation  
660 South Figueroa Street  
Suite 1000  
Los Angeles, CA 90017-3452

**LOS ANGELES COUNTY MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE CHANGE**

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*Catherine*

CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

attachment

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LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT  
SCHEDULE

ACTIVITIES	COMPLETION DATE
Regional Board Staff Study Session with Regional Board Members	April 1
Mail out Response to Comments and Draft Tentative Permit (including Fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Permit	July 15

As of March 15, 1995

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
SANTERREY PARK, CA 91754-2136  
(213) 266-7300  
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February 16, 1996

Mr. Elroy Kiepke  
City Engineer  
City of Agoura Hills  
30101 Agoura Court, Suite 102  
Agoura Hills, CA 91301

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
HANDBOOK**

The consulting firm Camp Dresser and McKee has provided draft copies of the handbook to the Regional Board for comments and revisions. As we agreed to at the January 8, 1996, committee meeting at the Regional Board offices, we are transmitting copies for your review.

We hope that the handbook becomes a beneficial tool to the Permittees. However, your valuable input is essential in making the handbook helpful. The Regional Board expects to mail out the draft handbook to the public on March 19, 1996, along with the Tentative Permit. To accomplish this, your comments would be greatly appreciated if returned to my attention by February 29, 1996.

If you have any questions please feel free to call me directly at (213)266-7598.

  
CARLOS URRUNAGA  
Environmental Specialist III

Enclosure

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTREY PARK, CA 91754-2134  
(213) 266-7300  
FAX: (213) 266-7600



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February 16, 1996

Ms. Amy Glad  
Building Industry Association  
of So Cal  
1330 So. Valley Vista Drive  
Diamond Bar, CA 91765

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
HANDBOOK**

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CARLOS URRUNAGA  
Environmental Specialist III

Enclosure

0518

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
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(213) 266-7300  
FAX: (213) 266-7400



February 16, 1996

Ms. Melissa Beard  
California Environmental Assoc.  
423 Washington Street  
3rd Floor  
San Francisco, CA 94111

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
HANDBOOK**

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CARLOS URRUNAGA  
Environmental Specialist III

Enclosure

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2136  
(213) 266-7300  
FAX (213) 266-7600



February 16, 1996

Mr. Rick Morgan  
Deputy City Engineer  
City of Malibu  
23555 Civic Center Way  
Malibu, CA 90265

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
HANDBOOK**

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CARLOS URRUNAGA  
Environmental Specialist III

Enclosure

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

301 CENTRE PLAZA DRIVE  
SANTERREY PARK, CA 91754-2134  
(415) 266-7500  
FAX: (213) 266-7600



February 16, 1996

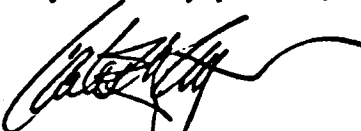
Ms. Susan Damron  
Department of Water & Power  
City of Los Angeles  
111 N. Hope Street Rm 1116  
Los Angeles, CA 90012

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
HANDBOOK**

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If you have any questions please feel free to call me directly at (213)266-7598.

  
CARLOS URRUNAGA  
Environmental Specialist III

Enclosure

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
SANTERREY PARK, CA 91734-2154  
(713) 266-7500  
FAX: (713) 266-7600



February 16, 1996

Mr. Phil Richardson  
Department of Public Works  
City of Los Angeles  
650 So. Spring Street, Room 700  
Los Angeles, CA 90014

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
HANDBOOK**

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If you have any questions please feel free to call me directly at (213)266-7598.

**CARLOS URRUNAGA**  
Environmental Specialist III

Enclosure

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
CANTERBURY PARK, CA 91734-2136  
(213) 266-7300  
FAX: (213) 266-7600



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February 16, 1996

Mr. Fullmer Chapman  
Department of Public Works  
City of La Cañada Flintridge  
1327 Foothill Bl  
La Cañada Flintridge, CA 91011

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
HANDBOOK**

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If you have any questions please feel free to call me directly at (213)266-7598.

**CARLOS URRUNAGA**  
Environmental Specialist III

Enclosure

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



CENTRE PLAZA DRIVE  
SAN FRANCISCO, CA 94111-2156  
(415) 776-7300  
FAX (415) 776-7600

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February 16, 1996

Ms. Pam Keyes  
Department of Public Works  
City of Culver City  
4095 Overland Ave  
Culver City, CA 90232-3731

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
HANDBOOK**

The consulting firm Camp Dresser and McKee has provided draft copies of the handbook to the Regional Board for comments and revisions. As we agreed to at the January 8, 1996, committee meeting at the Regional Board offices, we are transmitting copies for your review.

We hope that the handbook becomes a beneficial tool to the Permittees. However, your valuable input is essential in making the handbook helpful. The Regional Board expects to mail out the draft handbook to the public on March 19, 1996, along with the Tentative Permit. To accomplish this, your comments would be greatly appreciated if returned to my attention by February 29, 1996.

If you have any questions please feel free to call me directly at (213)266-7598.

**CARLOS URRUNAGA**  
Environmental Specialist III

Enclosure

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
SANTERRE PARK, CA 91754-3156  
(213) 266-7500  
FAX: (213) 266-7600



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February 16, 1996

Ms. Dee Zinke  
Building Industry Association  
of LA/Ventura  
24005 Ventura Blvd  
Calabasas, CA 91302

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
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CARLOS URRUNAGA  
Environmental Specialist III

Enclosure

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
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(213) 266-7500  
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February 16, 1996

Mr. Tom Kennedy  
Department of Public Works  
City of Vernon  
4305 S Santa Fe Ave  
Vernon, CA 90058-1786

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**CARLOS URRUNAGA**  
Environmental Specialist III

Enclosure

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX (213) 266-7600



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February 16, 1996

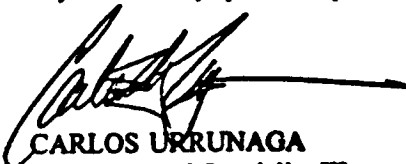
Mr. Craig Perkins  
Env and Public Works Mgmt Dept  
City of Santa Monica  
1685 Main St  
Santa Monica, CA 90407-2200

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CARLOS URRUNAGA  
Environmental Specialist III

Enclosure

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
STERBY PARK, CA 91754-2156  
(213) 266-7300  
FAX: (213) 266-7600



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February 16, 1996

Mr. Don Williams  
Department of Public Works  
City of Santa Clarita  
23920 Valencia Bl, Ste # 300  
Santa Clarita, CA 91355-2175

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
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**CARLOS URRUNAGA**  
Environmental Specialist III

Enclosure

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

LOS ANGELES REGION

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-3156  
(213) 266-7500  
FAX (213) 266-7600



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February 16, 1996

Mr. Sam Wise  
Rolling Hills Estates  
4045 Palos Verdes Dr, North  
Rolling Hills Estates, CA 90274

LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
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CARLOS URRUNAGA  
Environmental Specialist III

Enclosure

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
SANTERREY PARK, CA 91734-3186  
(213) 266-7500  
FAX: (213) 266-7600



February 16, 1996

Ms. Cynthia Kurtz  
City of Pasadena  
100 N Garfield Ave, Rm 212  
Pasadena, CA 91101-7215

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
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CARLOS URRUNAGA  
Environmental Specialist III

Enclosure

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

150 CENTRE PLAZA DRIVE  
TERRY PARK, CA 91754-2136  
(213) 266-7300  
FAX (213) 266-7600



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February 16, 1996

Ms. Gail Feuer  
Natural Resources Defense Council  
6310 San Vicente Blvd, Ste 250  
Los Angeles, CA 90048

LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
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CARLOS URRUNAGA  
Environmental Specialist III

Enclosure

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7300  
FAX (213) 266-7600



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February 16, 1996

Mr. Charles Bergson  
Assistant City Engineer  
City of Monterey Park  
320 West Newmark Avenue  
Monterey Park, CA 91754-2896

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT DRAFT  
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**CARLOS URRUNAGA**  
Environmental Specialist III

Enclosure

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2136  
(713) 266-7500  
FAX: (713) 266-7600



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February 16, 1996

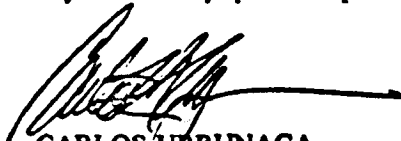
Mr. Ora Lampman  
Department of Public Works  
City of Burbank  
275 E Olive Ave  
Burbank, CA 91502-1267

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CARLOS URRUNAGA  
Environmental Specialist III

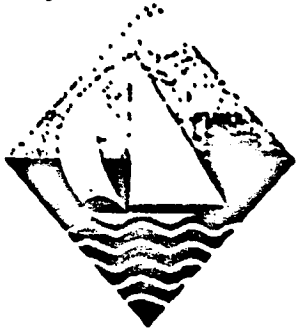
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FEB 14 '96 04:36PM CITY OF REDONDO BCH

P.1/2

*\* Priority -  
prepare presentation  
based on report*



**FAX**

TO: Catherine Tyrrell FAX #: (213) 266-7626

CONTAINS PAGES 1 THROUGH \_\_\_\_\_ DATE SENT: \_\_\_\_\_

SENT BY: Councilman Joe Dawidziak EXT. 2404

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_

**City of Redondo Beach**  
415 Diamond St, Redondo Beach, CA 90277 - (310) 372-1171 - FAX #: (310) 379-9288

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FEB 14 '96 04:35PM CITY OF REDONDO BCH

P.22

JOSEPH C. DAWIDZIAK  
COUNCILMAN  
DISTRICT 1



TEL: (310) 372-1171  
FAX: (310) 372-8268

**CITY OF REDONDO BEACH  
CALIFORNIA**

415 DIAMOND STREET  
POST OFFICE BOX 270  
REDONDO BEACH, CALIFORNIA 90277-0270

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February 13, 1996

Catherine Tyrrell, Asst. Executive Director  
REGIONAL WATER QUALITY CONTROL BOARD  
101 Centre Plaza Drive  
Monterey Park, CA 91754

Dear Ms. Tyrrell:

As we discussed, I would like to extend to you an invitation to appear before the South Bay Cities Council of Governments (SBCCOG) on Thursday, February 22, 1996, at 7:00 p.m. The SBCCOG meets at:

**Torrance Cultural Arts Center, Music Room**

(Located adjacent to the Torrance Police Department, east of Malibu Ave & north of Torrance Blvd)


I have placed the National Pollution Discharge Elimination System (NPDES) County permit on the agenda for that meeting. As a representative for the Regional Water Quality Control Board, your presence will ensure a balanced discussion.

I have written the SBCCOG Delegates, City Managers and City Engineers encouraging them to attend this meeting and participate in the discussion. To facilitate participation and discussion, I intend to ask the Chair, Councilman John McTaggart of Rancho Palos Verdes, to reorder the agenda and move this item to beginning of the meeting.

It is in all of our best interests to ensure the health of our eco systems. The primary question is and should be "how best to accomplish our goal of clean water?" At the root of this question is equity and fair share. As currently proposed, the NPDES permit does not adequately address either. We cannot approach such a complex problem with the attitude "we'll work out the details later". It is imperative that we all are committed to the same goals, values and course of action. To that end, the only process which will produce those commitments and a consensus is a bottoms up approach.

I look forward to seeing you on February 22, 1996, at the Torrance Cultural Arts Center. If you need any assistance or have questions regarding the facilities or directions please contact, Pat Blumen of the Torrance Planning Department (310) 618-5990 or my secretary, Thelma Guerra at (310) 372-1171, extension 2404.

Sincerely,

  
Joe Dawidziak

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**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

February 8, 1996

IN REPLY PLEASE REFER TO FILE EP-3

Dr. Robert P. Ghirelli  
Executive Officer  
California Regional Water  
Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Dr. Ghirelli:

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT (PERMIT)  
NO. CA0061654 (CI6948) - SECOND QUARTER PROGRESS REPORT**

The following report is submitted in compliance with the above-captioned Permit which was issued on June 18, 1990. This report provides a summary on the status of specific Permit task/requirements performed during the second quarter (October 1 through December 31, 1995) of the sixth year of the Permit which began on July 1, 1995.

**Activities for the New Permit**

The Permittees, through the Executive Advisory Committee, have continued to actively participate in numerous meetings with your staff to establish the requirements for the new Permit. All Permittees, excluding those in the Ballona Creek and Urban Areas Watershed, meet monthly. Each meeting is chaired by Los Angeles County and attended by Permittees respective to each of the six watersheds. Until the issuance of the new Permit, these watershed meetings will serve as an open forum where Permittees can address issues pertaining to their individual watershed and participate in the development of terms for the new Permit.

**County Building and Safety and Construction Personnel Training**

The County has developed a training program to apprise field personnel of the NPDES Permit requirements. The initial training apprised the attendants on the history of the NPDES Permit, the type of non-compliance activities commonly found at construction sites, the progress on the upcoming new Permit, and the effects of the NPDES Permit requirements on the County and its contractors.

*Handwritten notes and signature:*  
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Ch - [unclear]

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Dr. Robert P. Ghirelli  
February 8, 1996  
Page 2

Each attendant received a handbook titled Best Management Practices Handbook for Construction Activities (Attachment A). This handbook covers briefly the NPDES Permit requirements, water quality impacts from non-compliance activities, and Best Management Practices (BMPs) for construction sites. So far, the County has trained 200 Construction Division personnel and 120 Building and Safety Division personnel. Training of all field personnel has been completed as of February 1, 1996. More detailed training will be developed and scheduled in conjunction with the requirements of the new Permit.

#### **Public Education and Outreach**

##### **- Storm Drain Pollution Awareness**

The County, through a 319h Grant, has contracted with the Sierra Group to develop a Public Education/Outreach Program to promote storm drain pollution awareness among the residents of the County. Billboard and transit shelter advertisements were posted in January and will run until April of this year. In conjunction with the Sierra Group, the County has also been working on the development of a public education plan targeting junior/senior high school students and the establishment of guidelines and a target polling audience for the second public opinion poll. The monthly progress report for November from the Sierra Group is enclosed (Attachment B).

##### **- Informational Brochure**

The modified brochures on BMPs (based on the nine brochures developed by the City of Los Angeles as discussed last quarter) were distributed to the Co-Permittees in the Dominguez Channel/Los Angeles Harbor Watershed on January 25, 1996, during the monthly watershed meeting. Copies of the brochures are also available at seven County libraries and two Building and Safety branch offices within the watershed to any interested parties.

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Dr. Robert P. Ghirelli  
February 8, 1996  
Page 3

**Stormwater Quality Management Plan and Storm water/Urban Runoff Monitoring Plan**

In anticipation of the requirements of the new Permit, the County prepared a Request for Proposal (RFP) for hiring a consultant to develop the stormwater management plans and monitoring program that will be required by the new Permit. We anticipate awarding this contract in early March 1996.

**Receiving Waters Study for Marina del Rey and Ballona Creek**

The County is providing substantial funding for a coordinated study among the USC Sea Grant Program, Southern California Coastal Water Research Project, and University of California, Los Angeles, to determine whether the stormwater runoff from Ballona and Malibu Creeks has any impact on the beneficial uses of the coastal ocean. The proposed research will span over a period of two years, using the data gathered from six wet weather sampling and two annual dry weather sampling events. An optional third year of research may be added in order to meet the goals of the study. The results of this study will be used to focus our stormwater management efforts to address identified problems. Study results will also be used to assess the contamination and/or toxicity levels in the Ballona Creek sediments to better define the contributions of these sediments to the contaminated sediment problem in the Marina del Rey entrance channel.

**Phase I: Santa Monica Bay Drainage Basin**

Phase I Permittees continue to implement their programs. There are no remaining Permit tasks to initiate for this Phase.

**Phase II: Upper Los Angeles River and Upper San Gabriel River Drainage Basins**

Phase II Permittees continue to implement their programs. There are no remaining Permit tasks to initiate for this Phase.

**Phase III (Year Three Activities): Lower Los Angeles River, Lower San Gabriel River, and Santa Clarita Valley Drainage Basins**

Phase III Permittees are underway with their third-year requirements to implement Early Action and Additional BMPs.

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Dr. Robert P. Ghirelli  
February 8, 1996  
Page 4

If you have any questions regarding this report, please contact Gary Hildebrand at (818) 458-5948, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Director of Public Works



FRED M. RUBIN  
Assistant Deputy Director  
Environmental Programs Division

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ATTACHMENT A

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**NPDES Stormwater Permit**  
**BEST MANAGEMENT PRACTICES HANDBOOK**  
**FOR CONSTRUCTION ACTIVITIES**



*Prepared by Environmental Programs Division*  
*January, 1996*

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**Dumping is illegal !**

Whether it is liquid or solid, hazardous or non,  
into a street, catchbasin, flood control channel or natural drainage course.

**Call 1-800-303-0003**

to report illegal acts of dumping.

03550

**TABLE OF CONTENTS**

**INTRODUCTION** ..... 3

**PURPOSE AND SCOPE OF THE HANDBOOK** ..... 3

**SITE INSPECTION** ..... 5

**RECORD KEEPING** ..... 5

**CONSTRUCTION SITE BEST MANAGEMENT PRACTICES CHECKLIST** ..... 7

**APPENDIX A - List of construction related BMP's**

**APPENDIX B - Listing of County Codes, regulations, and administrative directives**

**APPENDIX C - Construction Site Pollutants**

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**INTRODUCTION**

In 1972, the Federal Water Pollution Control Act (Clean Water Act (CWA)) was amended to provide that the discharge of pollutants to waters of the United States from storm water is prohibited, unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. In 1987, amendments to the CWA added Section 402(p) which established a framework for regulating municipal, industrial, and construction storm water discharges under the NPDES program. In California, these permits are issued through the State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCB).

The Municipal Storm water Permit issued to the County and 85 cities in 1990 (referred to as municipal Storm Water NPDES Permit) requires the County and other cities to develop and implement a Storm Water Runoff Management Program to reduce pollutants to receiving waters. Such programs include erosion/pollution control on construction activities, both public and private, irrespective of size. Failure on the part of a municipality to provide such controls at construction sites could result in fines up to \$25,000 per day of violation and possible imprisonment. In addition, as of October 1, 1992, construction sites which have five or more acres must be covered by a separate NPDES permit, and failure to comply with these requirements can also result in a fine of up to \$25,000 per day of violation and possible imprisonment.

The primary objectives of the NPDES storm water permit in conjunction with construction activities are to:

- ◆ Reduce excessive erosion potential
- ◆ Minimize excessive sedimentation
- ◆ Prevent other materials used at construction sites from causing off site contamination
- ◆ Eliminate non-storm water discharges from construction sites

**PURPOSE AND SCOPE OF THE HANDBOOK**

The overall goal of the Storm Water Program is to reduce the adverse impacts of storm water discharges on receiving waters such as rivers, lakes, and the ocean. The purpose of this handbook is to provide methods to reduce or eliminate excessive erosion, sedimentation and pollution caused by construction activities. A storm water program can achieve this purpose by implementing Best Management Practices (BMPs). BMPs are processes, procedures, schedules of activities, and prohibitions on practices that could prevent or reduce the amount of pollutants in storm water runoff. The handbook explains:

- ◆ Why is erosion/pollution control required during construction activities (*Introduction*)

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- ◆ What construction related BMPs are available and how are they used (*Activities fact sheets: Appendix A*)
- ◆ Legal authority - List of existing County Codes, regulations and administrative directions applicable to storm water erosion/pollution prevention (*Appendix B*)

### CONSTRUCTION SITES AND THEIR IMPACTS ON WATER QUALITY

Sediment which results from the excessive erosion of disturbed soils is the primary pollutant of concern resulting from construction activities. Soil erosion is the process by which soil particles are removed from the land surface by water, wind or gravity. Most natural erosion takes place at slow rates; however, the rate of erosion can be accelerated by construction activities which clear or alter the natural landscape. Excessive sediment can cause increased turbidity and reduced light penetration resulting in reduction of prey capture for sight feeding predators, clogging of gills and filters of fish and aquatic invertebrates, reduced spawning and juvenile fish survival, reduced angling success, smothering of bottom dwelling community, and reduction in aesthetic values. Other pollutants of concern associated with construction activities include nutrients, trace metals, other toxic chemicals, and miscellaneous wastes. These pollutants originate from a wide variety of construction activities (see Appendix C for complete listing).

Each construction project is unique and has its own pollution risks, therefore, an understanding of the pollution risks of the construction activity is essential for selection and implementing BMPs. Once pollution risks are defined, BMP objectives are developed, and selected. The BMP objectives for construction projects are as follows:

- ◆ Practice Good Housekeeping: Perform activities in a manner which keeps potential pollutants from either draining or being transported off-site by managing pollutant sources and modifying construction activities.
- ◆ Contain Waste: Dispose of all construction waste in designated areas, and keep storm water from flowing on to or off of these areas.
- ◆ Minimize Disturbed Areas: Only clear land which will be actively under construction (e.g., within the next 6-12 months), minimize land disturbance during the rainy season, and avoid clearing/disturbing sensitive areas (e.g., steep slopes and natural watercourses) and other areas where site improvements will not be constructed.
- ◆ Stabilize Disturbed Areas: Provide temporary stabilization of disturbed soils whenever active construction is not occurring on a portion of the site. Provide permanent stabilization during finish grade and landscape the site.
- ◆ Protect Slopes and Channels: Outside of approved grading plan area, avoid disturbing steep or unstable slopes. Safely convey runoff from the top of the slope, and stabilize disturbed slopes as quickly as possible. Avoid disturbing natural channels. Stabilize temporary and permanent channel crossings as quickly as possible, and make efforts to ensure that increases in runoff velocity caused by the project do not erode the channel.

05545

- ◆ Control Site Perimeter: Upstream runoff should be diverted around or safely conveyed through the construction project. Local codes usually state that such diversions must not cause downstream property damage or be diverted into another watershed. Runoff from the project site should be free of excessive sediment and other constituents.
- ◆ Control Internal Erosion: Detain sediment-laden waters from disturbed, active areas within the site.

Once the BMP objectives have been defined for the site, specific BMP categories can be identified. At a minimum, these BMP categories should include the following:

1. Construction Practices
2. Material Management
3. Waste Management
4. Vehicle and Equipment Maintenance
5. Vegetative Stabilization
6. Physical Stabilization
7. Runoff Diversion
8. Velocity Reduction
9. Sediment Trapping

Under each of these categories there are BMPs designated to deal with the issue. Appendix A of this handbook contains a listing and description of all construction related BMPs. Certain construction activities cause pollution if not properly managed. BMPs should be selected for each activity shown in the fact sheets. Not all of the BMPs listed will apply to every construction site. However, all of the suggested BMPs in Appendix A should be considered, and those which are appropriate for the project at hand should be selected.

### SITE INSPECTION

Inspections before and after a storm event are required by the Construction General Permit. During other activities of the construction project (e.g. clearing, grubbing, earth movement, etc.), it is more appropriate to perform inspections of the BMPs more frequently. This will allow sufficient time for implementation of any corrections or improvements. Construction erosion/pollution prevention inspection can usually be performed as part of a regular construction inspection program.

### RECORD KEEPING

Records of all inspections, compliance certifications, and non-compliance reporting are to be retained for at least five years, as required by the NPDES permit. Check lists are included for field personnel to assure that BMP objectives are being met. The inspector should first go through

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the list and check all BMP's which are applicable to the site. He should then perform inspections on a routine basis (see criteria in previous section) to see that the applicable BMP's have been properly implemented and are being adequately maintained. The date of each inspection and any comments should be logged onto the forms. The forms must be completed and filed to meet NPDES permit requirements.

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# CONSTRUCTION SITE BEST MANAGEMENT PRACTICES (BMPS)

SITE \_\_\_\_\_

BMP	APPLICABLE TO SITE (S)	SITE INSPECTION FOR BMP UTILIZED					COMMENTS (OTHER BMPs UTILIZED)
		DATE INSPECTED BY					
<b>Construction Practices</b>							
De-watering (CA 1)							
Paving (CA 2)							
Construction (CA 3)							
<b>Material Management</b>							
Delivery Storage (CA 10)							
Material Use (CA 11)							
Spills (CA 12)							
<b>Waste Management</b>							
Soils (CA 20)							
Hazardous (CA 21)							
Contaminated (CA 22)							
Concrete (CA 23)							
Sanitary/Septic (CA 24)							
<b>Vehicle/Equipment Maintenance</b>							
Cleaning (CA 30)							
Fueling (CA 31)							
Maintenance (CA 32)							
<b>Vegetative Stabilization</b>							
Planting (ESC 10)							
Mulching (ESC 11)							
<b>Physical Stabilization</b>							
Geotextiles (ESC 20)							
Dust Control (ESC 21)							
Stabilized Ent. (ESC 24)							
<b>Runoff Diversion</b>							
Earth Dike (ESC 30)							
Temp. Drains (ESC 31)							
Slope Drain (ESC 32)							
<b>Velocity Reduction</b>							
Outlet Protect (ESC 40)							
Check Dams (ESC 41)							
Slopes (ESC 42)							
<b>Sediment Trapping</b>							
Silt Fence (ESC 50)							
Straw Bales (ESC 51)							
Sand Bags (ESC 52)							
Rock Filter (ESC 53)							
Outlet Protection (ESC 54)							
Sediment Trap (ESC 55)							
Sediment Basin (ESC 56)							

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**APPENDIX A**

**Listing of Construction Related BMPs**

Discharge of pollutants to storm water can result from construction related activities. Sediment (S), nutrients (N), toxic materials (TM), oil and grease (O&G), floatable materials (FM), and other construction waste (OCW) are the most probable pollutants generated from construction projects. These pollutants can be eliminated or reduced by implementing Best Management Practices (BMPs). The construction related BMPs entail practicing good housekeeping, containing waste, minimizing and/or stabilizing disturbed areas, protecting slopes channels, controlling site perimeter, and controlling internal erosion. Implementation of the BMPs during construction activities is the responsibility of developer/owner/contractor of the project. Therefore, developer/owner/contractor education is a necessary tool for proper implementation of BMPs. The main objectives of the training are to promote a clear identification and understanding of the problems, identify solutions, and implement and maintain the proper BMPs. The following is a listing and a brief description of construction related BMPs. More detailed descriptions can be found in the California Storm Water Best Management Practice Handbook, developed by the State Storm Water Task Force. A copy of the handbook is available at the Permit and Field offices and in Environmental Programs Division. Other BMPs not listed here can be utilized, but should be documented in the comments section of the inspector's checklist.

**I. Construction Practice BMPs**

**CA 1 - DEWATERING OPERATIONS**

Using sediment controls and filtration, testing of the groundwater in areas suspected of having groundwater pollution, and properly handling and disposing of the contaminated water can help reduce pollution from dewatering discharges to storm water. Targeted pollutants are S and TM.

**CA 2 - PAVING OPERATIONS**

Using appropriate measures to prevent runoff and runoff pollution, properly disposing of waste, avoid paving during wet weather, storing materials away from drainage courses, and protecting drainage courses can prevent or reduce discharge of pollutants relating to paving operations into storm drain. Targeted pollutants are S, TM, and O&G.

**CA 3 - STRUCTURE CONSTRUCTION AND PAINTING**

Storing paints and solvents properly in enclosed or covered areas, using good housekeeping practices, disposing waste promptly and appropriately, and using safer alternative products are measures which can prevent or reduce storm water pollution resulted from structure construction and painting activities. Targeted pollutants are OCW, FM, and TM.

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**II. Material Management BMPs**

**CA 10 - MATERIAL DELIVERY AND STORAGE**

Minimizing storage of hazardous materials on-site, designating areas for material delivery and storage, installing secondary containment and covered areas, and conducting regular inspections are all best management practices for eliminating or minimizing potential storm water pollutants caused by material delivery and storage. Targeted pollutants are S, N, TM, O&G, and FM.

**CA 11 - MATERIAL USE**

Some of the measures which can prevent or reduce storm water pollution generated from material use includes using hazardous materials as little as possible and only if other safer alternative products are not available. Targeted pollutants are N, TM, O&G, and FM.

**CA 12 - SPILL PREVENTION AND CONTROL**

Storing hazardous materials and wastes in covered containers and protected from vandalism, cleaning up leaks and spills immediately, stopping source(s) of spills, inspecting for leaks in vehicle on-site, and placing a stockpile of spill cleanup materials where it will be readily accessible are all BMPs. Targeted pollutants are TM and O&G.

**III. Waste Management BMPs**

**CA 20 - SOLID WASTE**

Selecting designated waste collection areas on-site, providing an adequate number of containers and locating containers in a covered area and/or in a secondary containment, arranging regular disposal and more frequent pickup during the demolition phase of construction are all preventive practices. Targeted pollutants are FM, OCW, and S.

**CA 21 - HAZARDOUS WASTE**

Using, storing, disposing/recycling hazardous materials/waste properly, and leaving manufacturer's label on product could prevent hazardous waste from discharging into the storm drain. Targeted pollutants are TM.

**CA 22 - CONTAMINATED SOILS**

Some measures for limiting impacts of contaminated soils on storm water are conducting pre-construction surveys, inspecting excavations regularly, assessing the full extent and intensity of contamination, and remediating the

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contaminated soil appropriately and promptly. Targeted pollutants are TM and S, and highly acidic or alkaline soils.

**CA 23 - CONCRETE WASTE, SANDBLASTING GRIT**

Avoiding mixing excess amounts of fresh concrete/cement on-site. Conduct washouts off-site at an approved location or a designated area on-site. This practice can prevent discharge of pollutants to storm water from concrete waste.

**CA 24 - SANITARY/SEPTIC WASTE**

Sanitary or septic wastes must be treated and/or disposed of in accordance with state and local requirements. Providing convenient, well-maintained facilities, and arranging for regular service and disposal are not only required but also help in preventing/reducing sanitary/septic pollutants from entering the storm water.

**IV. Vehicle and Equipment Maintenance BMPs**

Toxic materials and O&G are the two targeted pollutants to storm water result from vehicle and equipment cleaning, fueling, and maintenance. As a general BMP for these activities, conduct these activities off-site as much as possible or in designated or contained areas on-site, and store materials in enclosed or covered areas.

**CA 30 - CLEANING**

Beside the general BMPs, other BMPs include prohibiting steam cleaning on-site, using phosphate-free or biodegradable soaps, using as little water as possible, and infiltrating or recycling the wash water.

**CA 31 - FUELING**

In addition to the general BMPs captioned above, implementing spill controls, containing and cleaning up spills immediately are also BMP's for fueling vehicles or equipments on-site.

**CA 32 - MAINTENANCE**

Inspecting on-site and incoming vehicles and equipments for leaks and spills, and repairing them immediately, containing and cleaning up spills immediately are also BMPs.

**V. Vegetative Stabilization BMPs**

**ESC 10 - SEEDING AND PLANTING**

Seeding of grasses and planting of trees, shrubs, etc., provide stabilization of soil, reduce erosion, allow infiltration to occur, filter sediments, and hold soil particles in place. This BMP stabilizes disturbed areas and protects

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slopes/channels on site both during construction and post-construction. Targeted pollutants are S, N, and TM.

#### ESC 11 - MULCHING

Mulching stabilizes cleared or freshly seeded areas temporarily and permanently, increases infiltration, and prevents compacting and cracking of soil. Stabilization of soil prevents erosion and protects soil from rainfall impact. Types of mulches include organic materials, straw, wood chips, bark or other wood fibers, decomposed granite, and gravel. Targeted pollutants are S and N.

### VI. Physical Stabilization BMPs

#### ESC 20 - GEOTEXTILES AND MATS

Although mats are most suitable for post-construction site stabilization, they may be used for temporary stabilization of highly erosive soils, channels and streams, and steep slopes. Some organic matting materials include jute and straw. Some synthetic matting materials include excelsior, glass fiber, staples, and mulch netting. Targeted pollutants are S.

#### ESC 21 - DUST CONTROL

For construction activities, such as clearing and grading, drilling and blasting, soil and debris storage piles, etc., dust control measures are used to stabilize soil from erosion. Some of the dust control BMPs for storm water pollution prevention include paving, vegetating, or chemically stabilizing access points where unpaved traffic surfaces adjoin paved roads; providing covers for haul trucks transporting materials that contribute dust; providing wet suppression or chemical stabilization of exposed soils; and limiting the amount of areas disturbed by clearing and earth moving operations by scheduling these activities in phases. Refer to Table ESC 21.1 of California Storm Water Best Management Practices - Construction Activity, March 1993. Targeted pollutants are S, TM, and O&G.

#### ESC 22 - TEMPORARY STREAM CROSSING

A temporary access stream crossing is a culvert, ford, or bridge placed across a waterway to provide access for construction for a period of less than one year. This BMP prevents construction equipment from causing erosion of the stream and tracking sediment and other pollutants into the stream. Targeted pollutants are S, O&G.

#### ESC 23 - CONSTRUCTION ROAD STABILIZATION

On-site vehicle transportation routes, access roads, parking areas, and subdivision roads are susceptible to erosion and dust. These sediments may

be transported by runoff or during wet weather to streams or storm water. Stabilizing and maintaining construction vehicle transportation routes and parking areas is one of the BMPs to prevent erosion and control dust.

**ESC 24 - STABILIZED CONSTRUCTION ENTRANCE**

Stabilizing all points of construction ingress and egress significantly reduces or eliminates sediment tracking from site onto paved roads or streets. This practice removes sediment from equipment and helps prevent deposition of sediments into local storm drains and production of airborne dust. Targeted pollutants are S, N, TM, O&G.

**VII. Runoff Diversion BMPs**

The following runoff diversion BMPs are used to reduce erosion and offsite sedimentation. The purpose of these devices is to divert storm water runoff to a designated area such as a sediment basin or trap or onto a stabilized area/structure. The targeted pollutant for the following BMPs is sediment.

**ESC 30 - EARTH DIKE**

Earth dike is a berm or ridge of compacted soil, used to divert flow away from disturbed areas or unprotected slopes to a desired location thereby reducing the potential for erosion and offsite sedimentation.

**ESC 31 - TEMPORARY DRAINS/SWALES/DRAINS**

For slopes formed during cut and fill operations, stabilized temporary drains and swales are used to protect erosion from runoff by diversion and thus reducing the potential of pollutants associated with these activities from entering into the storm water. This practice also prevents slope failures, damage to adjacent property..

**ESC 32 - SLOPE DRAINS**

Slope drain is a temporary pipe or lined channel to drain the top of a slope to a stable discharge point at the bottom of a slope without causing erosion. This BMP typically is used in combination with a diversion control.

**VIII. Velocity Reduction BMPs**

Velocity reduction BMPs are used to reduce flow velocities which cause erosion. These BMPs also serve as sediment trap which may reduce deposits of sediment in the storm waterways.

**ESC 40 - OUTLET PROTECTION**

Rock outlet protection is a physical device composed of rock, grouted riprap, or concrete rubble which is placed at the outlet of a pipe to prevent scour of

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the soil caused by high pipe flow velocities, and to absorb flow energy to produce non-erosive velocities.

**ESC 41 - CHECK DAMS**

Check dams are small temporary dams constructed across a swale or a drainage ditch. These dams reduce the velocity of storm water flows, thus reducing erosion of the swale/ditch, and also promote short term sedimentation behind the dam.

**ESC 42 - SLOPE ROUGHENING/TERRACING**

Slope roughening/terracing is used for slope stabilization and erosion control. To roughen/terrace the slope is to create uneven depressions, steps or grooves on the soil surface to aid in establishment of vegetation, reduce runoff velocity, increase infiltration, and provide for sediment trapping.

**IX. Sediment Trapping BMPs**

The targeted pollutant for the following BMPs is sediment. The objectives of these BMPs are to protect slopes/channels, to control site perimeter, and to control internal erosion.

**ESC 50 - SILT FENCE BARRIER**

Silt fence is a temporary sediment barrier consisting of filter fabric stretched across and attached to posts or wire fence fabric. Silt fences are generally ineffective in locations where the flow is concentrated and are only applicable for sheet or overland flows.

**ESC 51 - STRAW BALE BARRIER**

Straw bale barriers consists of a series of secured anchored bales placed to intercept sediment-laden runoff from small drainage areas of disturbed soil. These barriers are typically constructed below disturbed areas subject to sheet flow runoff.

**ESC 52 - SAND BAG BARRIER**

Sand bag barriers are made by stacking sand bags along a level contour. This BMP is used to detain sediment-laden water, ponding water upstream of the barrier and promoting sedimentation. Sand bag barriers may be used in place of straw bales or silt fences.

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**ESC 53 - BRUSH OR ROCK FILTER**

A brush barrier is composed of brush (usually obtained during the site clearing) wrapped in filter cloth. A rock filter berm is made of open graded rock. These devices are placed in areas where sheet or rill flow occurs, at the toe of the slope, along the perimeter of a developing or disturbed area, and as a check dam across construction roads. Their purpose is to intercept sediment laden runoff from disturbed areas of the site, allow the runoff to pond, promote sedimentation behind the filter, and slowly release the water as sheet flow.

**ESC 54 - STORM DRAIN INLET PROTECTION**

Storm drain inlet protection is a device to detain sediment-laden runoff and allow the sediment to settle prior to discharging the filtered runoff into a storm drain inlet or catch basin. Some of the inlet protection devices are filter fabric fence, block and gravel filter, gravel and wire mesh filter, sand bag barrier, and excavated drop inlet sediment trap. Targeted pollutants are S and FM.

**ESC 55 - SEDIMENT TRAP**

A sediment trap is a small, excavated or bermed area where runoff from small drainage areas is detained and sediment can settle. It should help in removing coarse sediment from runoff.

**ESC 56 - SEDIMENT BASIN**

A sediment basin is a controlled storm water release structure formed by excavation or constructing an embankment, and designed to retain or detain runoff sufficiently to allow excessive sediment to settle. These basins are suitable for nearly all types of construction projects.

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**APPENDIX B**

**Listing of County Codes, Regulations, and Administrative Directives**

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**LEGAL AUTHORITY**

The following County codes , regulations and administrative directives are a combination of information from the county engineer, Flood Control District, Health Department, Uniform Building Codes, Building and Safety Administrative Manuals, Zoning Ordinances, Standard Specifications for Public Works Construction, etc. This list may not be inclusive, but for this handbook's purpose, these codes are the County's legal authority for enforcing erosion and pollution control.

<b>COUNTY REGULATIONS FOR PRIVATE PROPERTY AND COUNTY PROJECTS</b>	<b>ACTIVITY</b>	<b>RESPONSIBLE AGENCY</b>
Los Angeles County Code, Title 20, Division 2 (Sanitary Sewers and Industrial Waste), Chapter 20.36	Prohibits discharge of offensive or damaging substances.	Los Angeles County Department of Public Works, Industrial Waste/ Underground Tank Section.
Los Angeles County Code, Title 20, Division 5 (Flood Control District Property & Facilities), chapter 20.94	Placing obstructions, refuse and contaminating substances in channels is prohibited.	Los Angeles County Department of Public Works, Flood Maintenance Division.
Los Angeles County Code, Title 10, Division I, Section 10.40.060	Animal nuisances (defecation) prohibited	Los Angeles County Department of Health Services.
Los Angeles County Code, Title 11 & 12, Division 4	Prohibits discharge, outlines cleanup responsibility	Los Angeles County Department of Health Services.
Los Angeles County Code, Title 15, Section 15.76.180, 15.76.190	Prohibits littering of high-Ways or sidewalks	Los Angeles County Department of Health Services.
Los Angeles County Flood Control Act, Act 4463, Section 133/4.	Acceptance of transfer of storm drain improvements and drainage improvements.	Los Angeles County Department of Public Works, Flood Maintenance Division/L.A. Co. Board of Supervisors.

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COUNTY REGULATIONS FOR PRIVATE PROPERTY AND COUNTY PROJECTS	ACTIVITY	RESPONSIBLE AGENCY
1991 Building Code, Chapter 70, Excavation and Grading	Erosion control	Los Angeles County Department of Public Works, Building and Safety/Land Development Division.

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COUNTY REGULATIONS FOR COUNTY PROJECTS	ACTIVITY	RESPONSIBLE AGENCY
Los Angeles County Code, Title 26, County of Los Angeles Building Code (1991 Edition), Chapter 70, (County is currently in the process of pursuing an Ordinance to Amend Title 26), Sect. 7010, 7012, 7019	Erosion control	Los Angeles County Department of Public Works, Building and Safety/Land Development Division.
"Graybook"--additions and Amendments to the Standard Specifications for Public Works Construction, January 1995. Sections 7-8.1, 7-8.2, 7-8.6 and 7-8.7	Control of dust, control of water pollution. Storm and drainage water control.	Los Angeles County Department of Public Works, Construction Division.
Standard Specifications for Public Works Construction, "Green Book", 1995 Edition, Section 7-8.	Control of dust, control of water pollution. Storm and drainage water control.	Los Angeles County Department of Public Works, Construction Division.
Uniform Plumbing Code, Title 28, Chapter 11, Section 1102 and Appendix 1, Section 8.	Prevention of illicit connections.	Los Angeles County Department of Public Works, Building and Safety/Land Development Division, Construction Division.
Zoning Ordinances: Title 21, Volume 6. Subdivision Code.	Cluster development, hillside development. Landscape/open space.	Los Angeles County Department of Public Works, Building and Safety/Land Development Division.



COUNTY REGULATIONS FOR COUNTY PROJECTS	ACTIVITY	RESPONSIBLE AGENCY
Building and Safety Administrative Manual Section 50.42	Release of unauthorized hazardous waste into the environment	Los Angeles County Department of Public Works, Building and Safety/Land Development Division.

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**APPENDIX C**  
**Construction Site Pollutants**

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## CONSTRUCTION SITE POLLUTANTS

CATEGORY	PRODUCT	POLLUTANT
ADHESIVES	Adhesives, Glues	Phenolics, Formaldehydes
	Resins, Epoxy Synthetics	Phenolics, Formaldehydes
	Calks, Sealers, Putty, Sealing Agents	Asbestos, Phenolics, Formaldehydes
	Coal Tars (Naphtha, Pitch)	Benzene, Phenols, Naphthalene
CLEANERS	Polishes, (Metal, Ceramic, Tile)	Metals
	Etching Agents	Metals
	Cleaners, Ammonia, Lye, Caustic Sodas	Acidity/Alkalinity
	Bleaching Agents	Acidity/Alkalinity
	Chromate Salts	Chromium
PLUMBING	Solder (Lead, Tin), Flux (Zinc Chloride)	Lead, Copper, Zinc, Tin
	Pipe Fittings (Cut Shavings)	Copper
	Galvanized Metals (Nails, Fences)	Zinc
	Electric Wiring	Copper, Lead
PAINTING	Paint Thinner, Acetone, MEK, Stripper	VOC's
	Paints, Lacquers, Varnish, Enamels	Metals, Phenolics, Mineral Spirits
	Turpentine, Gum Spirit, Solvents	VOC's
	Sanding, Stripping	Metals
	Paints (Pigments), Dyes	Metals
WOODS	Sawdust	BOD
	Particle Board Dusts (Formaldehyde)	Formaldehyde
	Treated Woods	Copper, Creosote
MASONRY & CONCRETE	Dusts (Brick, Cement)	Acidity, Sediments
	Colored Chalks (Pigments)	Metals
	Glazing Compounds	Asbestos
	Cleaning Surfaces	Acidity
FLOORS & WALLS	Flashing	Copper, Aluminum
	Drywall	Dusts
	Tile Cutting (Ceramic Dusts)	Minerals

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## CONSTRUCTION SITE POLLUTANTS

CATEGORY	PRODUCT	POLLUTANTS
REMODELING & DEMOLITION	Insulation	Asbestos
	Venting Systems	Aluminum, Zinc
	Brick, Cement, Saw, Drywall	Dusts
AIR CONDITIONING & HEATING	Insulating	Asbestos
	Coolant Reservoirs	Freon
YARD O & M	Vehicle and Machinery Maintenance	Oil and Grease, Coolants
	Gasoline, Oils, Additives	Benzene & Derivatives, Oil and Grease
	Marking Paints (Sprays)	Vinyl Chloride, Metals
	Grading, Earth Moving	Erosion (Sediments)
	Portable Toilets	BOD, Disinfectants (Spills)
	Fire Hazard Control (Herbicides)	Sodium Arsenite, Dinitro Compounds
	Health and Safety	Rodenticides, Insecticides
	Wash Waters	Herbicides, Concrete, Oils, Grease
LANDSCAPING & EARTHMOVING	Planting, Plant Maintenance	Pesticides, Herbicides, Nutrients
	Excavation, Tiling	Erosion (Sediments)
	Solid Wastes (Trees, Shrubs)	BOD
	Exposing Natural Lime or Other Mineral Deposits	Acidity/Alkalinity, Metals
	Soil Additives	Aluminum Sulfate, Sulfur
	Revegetation of Graded Areas	Fertilizers
MATERIALS STORAGE	Waste Storage (Oils, Solvents, Etc.)	Spills, Leaks, Discharge
	Hazardous Waste Containment	Spills, Leaks, Discharge
	Raw Material Piles	Dusts, Sediments, Polluted Discharge

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ATTACHMENT B

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Public Relations • Public Affairs

December 10, 1995

Mr. Stephen Groner  
Project Manager  
Waste Management Division  
L.A. County Department of Public Works  
900 South Fremont Avenue  
Alhambra, California 91803-1331

RE: L.A. County Stormwater/Urban Run-off Quality Management Program  
Contract #AS-2-67904  
November Monthly Activities Report

Dear Stephen:

Enclosed is our Monthly Activities Report for November 1995. Please feel free to call me if you have any questions or comments.

Sincerely,

Rebecca Barrantes  
President

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**LOS ANGELES COUNTY STORMWATER/URBAN RUNOFF  
QUALITY MANAGEMENT PROGRAM**

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**MONTHLY ACTIVITIES REPORT - NOVEMBER 1995**

**Introduction**

The Sierra Group has been retained by Los Angeles County, Department of Public Works to develop a Public Education/Outreach Project consisting of 3 key elements:

- 1) An Initial Public Opinion Poll to establish a definitive benchmark of storm drain pollution awareness level among the adults, aged 18 and over, representative of the diverse population in Los Angeles County covered by NPDES permit;
- 2) The development and implementation of a 6-month Public Education Campaign; and
- 3) A second poll at the completion of the campaign to determine its effectiveness.

**Executive Summary**

This month's activities continued to focus on follow-up with television, cable and radio media outlets to support the airing of PSAs and monitor frequency of airing. Additionally, The Sierra Group also provided research and assistance on advertising placements for theaters and billboards (both pro bono and paid advertising). An Executive Program Update was prepared for the Director of Public Works for a member of the Board of Supervisors (see attached memorandum).

**Key Activities and Outcomes for November 1995**

**Task 4.0 Implement the Campaign**

• **PSA DISTRIBUTION & AIRING**

Follow-up with television, cable and radio outlets continued this month with the objective of obtaining "air logs" documenting dates and time slots for the airing of PSAs. Summary reports of these contacts and information on airings per week/month will be provided again in December because of anticipated programming cycles detailed in the October report.

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LOS ANGELES COUNTY STORMWATER/URBAN RUNOFF  
QUALITY MANAGEMENT PROGRAM

Page 2

MONTHLY ACTIVITIES REPORT - NOVEMBER 1995

• **BILLBOARDS**

Arrangements for the production of billboards and transit shelters were finalized and posting periods were re-adjusted with Vista Outdoor Media for January 1996 to April 1996. The total dollar value of the 200 boards donated by Vista Outdoor media is \$50,000. The County is paying for posting of the 200 boards only, or 10,000.

The County requested The Sierra Group to explore paid billboard placements in freeway corridors. The Sierra Group obtained estimated costs for production of 14' x 48' posters, and rental and posting fees for five (5) locations. The County is considering this placement for sometime in 1996.

• **THEATRE ADVERTISING**

At request of County, The Sierra Group obtained information on the theatre advertising options including "on-screen slides" and "movie trailers". Preliminary production information and cost estimates were obtained and forwarded to the County (see attached memoranda). Based on the information provided the County, requested The Sierra Group to assist them in placing "on-screen" theater advertising in 26 local theaters depicting the billboard graphic and message.

"On-screen" slide advertising, which precedes the "feature" movie presentations will reach 1.8 million of our target audience over two months with this type of advertising. The Sierra Group was successful at obtaining this paid advertising at a 50% PSA discount over commercial rates. The 26 theatre package is worth \$36,000 and the County will only pay \$18,000.

• **FUTURE PROGRAM EFFORTS**

The Sierra Group has continued to work with the County to redefine the second phase of the project scope including modification Second Public Opinion Poll and development of a junior/high school program. The County has requested The Sierra Group to prepare modified polling options and scope and budget for development of a junior high and high school educational program.

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LOS ANGELES COUNTY STORMWATER/URBAN RUNOFF  
QUALITY MANAGEMENT PROGRAM  
Page 3

MONTHLY ACTIVITIES REPORT - NOVEMBER 1995

Problems/Issues Encountered

Several media outlets have indicated that they do not keep detailed "air logs" containing exact dates and times of PSA airings because they do not have the technical or staffing capability. In most cases, we were able to obtain airing frequencies on a weekly or monthly basis. We will continue to promote, monitor and report on the status of the airing of PSAs.

Expenditures

Task 4.0 Implement the Campaign

<u>Item</u>	<u>Cost</u>
June	\$17,036.67
July	17,036.67
August	17,036.67
September	17,036.67
October	17,036.67
November	17,036.67
<b>TOTAL TO DATE</b>	<b>\$102,190.02</b>

December Activities

Continued planning for the second phase of the Stormwater Public Education Program and development of scope of work, budget and schedules.

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November , 1995

**To: Supervisor Zev Yaroslavsky  
Third District**

**From: Harry Stone, Director**

**Subject: Stormwater Public Education Program Update**

Thank you for your support of the Department of Public Works Stormwater Public Education Program. We thought you would appreciate an update on the progress we are making with the public outreach campaign you helped us to launch on September 13, 1995.

In this initial phase of implementation, our campaign consists of television and radio public service announcements, billboards, transit shelter and theatre advertising. Our efforts have been focused on the distribution of our campaign message of "Don't dump in the drains" which will continue through the rainy season until May 1996.

**Television and Radio PSAs**

PSA tapes and campaign literature were distributed to local English and Spanish television, cable companies and radio stations in early September 1995. It normally takes six to eight weeks for television and radio outlets to review, approve and place PSAs into a programming rotation for airing. Frequency of PSA airing varies a great deal, however, most stations/channels are programming the PSAs more than twice a week and will continue to do so through May 1996. The PSA is being aired as follows:

***MEDIA OUTLETS CURRENTLY AIRING\*: 18***

**Television Stations = 3**

- KCAL (Channel 9)
- KSCI (Channel 18)
- KVEA (Channel 52)

**Cable Companies = 9**

- Century Communications (Brea)
- Century Communications (Santa Monica)
- Continental Cablevision (Los Angeles)
- Copley Colony (Wilmington)
- Falcon Cablevision (Malibu)
- Insight Cablevision (Claremont)
- Liberty Cable (South Gate)
- Sammons Communications (Lake Hughes)
- TCI Cablevision (Industry)

\* frequency of airing is estimated at two to five times a week.

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**Billboards & Transit Shelters**

We are working with the City of Los Angeles Department of Public Works, Stormwater Division on the placement billboards and transit shelters. We have decided to use the City of Los Angeles' graphic for the billboards and transit shelters which will include both the City and the County of Los Angeles' Stormwater Information telephone numbers. The County will post 200 billboards and 200 transit shelters, primarily in suburban, inner-city neighbor hoods and business districts.

**Theatre Advertising**

Two theatre advertising options are under consideration at this time. "On-screen" slide advertising, which precedes the "feature" movie presentations, is being considered for 26 theatres in County areas. We can potentially reach 1.8 million of our target audience over two months with this type of advertising at a low cost. We propose to use the same graphic for the "on-screen" slides as we are using on the billboards and transit shelters in order to reinforce our campaign message points and images.

Since we produced our television PSA on 35 mm, we found that we can obtain additional "reach" to theatre patrons by converting the television PSA to a "movie trailer", similar to advertisements or "previews of coming attractions". The cost of processing of the PSA trailer is nominal, and as PSA, we would not pay for on-screen advertising. We have targeted 10 to 12 Spanish-language theatre screens all over the County in order to reach mono-lingual Spanish speaking target audiences. The target audience reach for this advertising would be approximately 500,000 people over a period of two months.

**Future Program Efforts**

We are now in the preliminary planning stages of the second phase of the campaign. To date, we have concentrated on a media and advertising campaign which has a large reach and saturation. While we need to continue this effort, some specific target audiences should be addressed in subsequent phases of the Stormwater Public Education Program. For example, we have not had an educational program developed and implemented for junior high and high school-age youth which are our future and current "do-it-yourselfers". Also, based on the results of the Initial Public Opinion Poll completed in February 1995, we still need to develop a more concentrated and comprehensive program of outreach to the mono-lingual Spanish speaking target audience.

As we proceed with further program development, we will be sure to keep you and your staff fully informed of progress, results and opportunities for your involvement. Again, thank you for your interest and support.

Television and Radio PSAs (continued)

**Radio Stations = 6**

- KFWB (98.0 AM) - Live script
- KNX (1070 AM) - Tape
- KLOS (95.5 FM) - Tape
- KBIG (104.3) - Live Script and Tape
- KLACKZLA (93.9FM/570 AM) - Tape
- KALI (1430 AM - Spanish) - Live Script

\*Frequency of airing is averaging 5 to 8 times per week at various time slots.

**MEDIA OUTLETS AIRING IN DECEMBER\*\*: 15**

**Television Stations = 6**

- KABC (Channel 7)
- NBC4 (Channel 4)
- KCBS (Channel 2)
- KCOP (Channel 5)
- KMEX (Channel 34 - Spanish)
- KWHY (Channel 22 - Spanish)

**Cable Companies = 4**

- Buenvision (Los Angeles - Spanish)
- Charter Communications (Pasadena)
- Cox Communications (Rolling Hills)
- Time Warner Cable (Santa Clarita)

\*\*Frequency of airing to be monitored.

**Radio Stations = 5**

- KLSX (97.1 FM) - Live Script
- KRLA (1110 AM) "KRLA Cares" Feature Spot
- KRTH (101.1 FM) Public Affairs Program Interview
- KWKW (1330 AM - Spanish) - Live Scripts
- The Beat (92.3 FM) - Live Script

0571



Public Relations • Public Affairs

November 13, 1995

**To:** Ginger Vadurro  
**From:** Rebecca Barrantes  
**Subject:** Theatre Advertising for Stormwater PSAs

I have obtained additional information on the theatre advertising options presented in the November 1, 1995 memorandum. Much of the detailed cost information is contained in the attachments to this memorandum.

Theatre Trailer Film Processing

**OPTION 1**

We have obtained a quote for the film processing of the Stormwater PSA into a "trailer" for the theatre screen. As stated previously, we would use our "edit decision list" from the final cut of the PSAs in both English and Spanish. We need to retain a post-production company with experience in working with film negatives to do what is called "negative cutting" according to our PSA edit list. All "fades and dissolves" and "titles" have to be processed "optically". The rest of process consists of creating a "new negative" and transferring it unto film. The quote for these services from Hammer Filmworks is attached.

**Cost Estimate: \$6,000**

**OPTION 2**

A simple transferring of the video (from the edited master) to create the theatre trailer would be less complicated and costly.. The quality of the images would not be as good as the film processing under Option 1, but still acceptable. We contacted two companies, Composite Image and Image 4, and were quoted a basic charge of \$60/second for film transfer. Since this is a :30 second PSA we would expect to pay \$1,800 plus miscellaneous processing expenses.

**Cost Estimate: \$2,000**

Omni Centre • 900 Wilshire Boulevard, Suite 1518, Los Angeles, CA 90017

Tel: (213) 489-5605 • Fax: (213) 614-8006 • Fax: (310) 699-4605

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Ginger Vadurro  
11/13/95  
Page 2

### PSA Availability for Theatre Runs

We previously discussed the possibility of going into theatres with the English version of the Stormwater PSA trailer. We could select theatres which fit the demographics of our target audience. Also, we are working with Heal the Bay to identify the theatres where they are screening their PSA.

Secondly, I have continued efforts to locate and quantify the number of mono-lingual Spanish theatres there are in Los Angeles County. I have spoken to the advertising section of the largest circulation Spanish language newspaper, "La Opinion", and several movie chains. Current information continues to indicate that the local mono-lingual Spanish theatre market is limited because other Spanish language film entertainment outlets such as television, cable and video cassettes have reduced this theatre market over the last 10-15 years. This market is even more limited by the number of Spanish language theatres willing to accept PSAs. Additionally, the mono-lingual Spanish-speaking population, with the exception of recent immigrants, has been transitioning to a bi-lingual population as a result of the availability of several ESL programs for youth and adults.

We estimate that there are less than 40 theatres in the greater Southern California area (a five County area) which show primarily English speaking films dubbed or subtitled in Spanish. Of these, several are individually owned and operated and those that are in the County of Los Angeles are primarily located in the City of Los Angeles.

While the mono-lingual Spanish population is certainly in our target audience, theatres may not be as effective as television, cable, radio and newspapers in terms of reaching them.

### **OPTION 3**

#### On-Screen Advertising

"On Screen Advertising" ("preview screening slides") are an attractive option from the standpoint of target audience "reach", "frequency" and cost. We contacted National Cinema Network again and obtained an updated rate sheet and list of theatres where they advertise (see attached). Rates are structured on the number of screens at the theatre and circulation (patronage).

We were able to negotiate a 50% discount on their weekly rates for theatres which are not "at capacity" or already booked solid for advertising. We reviewed the list of theatres with County staff and selected those which fit the demographic of our target audience. There are approximately 26 theatres we could select for advertising using the artwork for the graphic image being used for our Stormwater campaign billboards and transit shelters.

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Ginger Vadurro  
11/13/95  
Page 3

National Cinema Network has prepared a cost proposal (attached) based on the selected group of theatres and which includes advertising costs, preparation and distribution of the slide(s) to be shown.

Advertising includes the showing of three slides equally spaced in a tray rotation. Each slide displays for 10 seconds on the screen and the audience would see the slide at least three times before the movie trailers and feature presentation begins. Average "reach" or theatre attendees varies per theatre -- see attachment for estimated attendance.

Cost Estimate: \$19,185\*/month

\*Production costs of \$600 includes design work plus duplication and distribution of slides to theatres.

Conclusion:

Trailer or slide advertising options in movie theatres present great opportunities for reaching our target audience and the County could consider both of them depending on timing and funding available.

There would be no cost to advertise using the "PSA trailer" options since we would request PSA placement as a public agency. The only costs incurred would be in the range of \$2,000 to \$6,000 to produce the trailer. There would be some additional costs to duplicate the trailer for the number of screens we could obtain under PSA "space available" arrangements.

Paid theatre advertising has considerably higher costs, but insures that your message is reaching the target audience. If the County decides on this option quickly we may be able to get into theatres for the Christmas holidays when there will be high patronage.

Regardless of which option for theatre advertising is pursued, I would recommend that the County opt for the larger bi-lingual market by targeting theatres in suburban areas, with high numbers of Latinos and 18-29 year-old "do-it-yourselfer" audiences.

0574



Public Relations • Public Affairs

November 1, 1995

To: Ginger Vadurro  
From: Rebecca Barrantes  
Subject: Stormwater PSAs for Theatre Runs

I have checked into the process and costs for re-formatting our :30 PSA for the theatre screen and other types of theatre advertising. I have some cost information, however, I am awaiting additional information which should come to me later this week..

Film Processing

**OPTION 1**

We were very wise to have shot this PSA on 35mm film and we have the negatives. We have an "edit decision list" which we used to edit the "raw 35mm footage" for the final cut of the PSAs in both English and Spanish. We need to retain a post-production person with experience in working with film negatives to do what is called "negative cutting" according to our PSA edit list. All "fades and dissolves" and "titles" have to be processed "optically". The rest of process consists of creating a "new negative" and transferring it unto film.

Rough Cost Estimate: \$5,000 to \$10,000

**OPTION 2**

A simple transferring of the video (from the edited master) would be the least complicated way to do this. However, we would lose some of the quality.

Rough Cost Estimate: \$2,000 to &5,000

PSA Availability for Theatre Runs

As a rule, if the theatre chain is already running a stormwater theme PSA they will not run another one simultaneously. As Heal the Bay is at the beginning of its PSA distribution, we would probably find it a bit hard to get our PSA run until theirs is finished. We could coordinate with them on our theatre run. Also, I am still checking into running the PSA in Spanish language theatres. Preliminary information indicates that the local mono-lingual

Omni Centre • 900 Wilshire Boulevard, Suite 1518, Los Angeles, CA 90017

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Ginger Vadurro  
11/1/95  
Page 2

Spanish theatre market is limited. It may be even more limited by the number of Spanish language theatres willing to accept PSAs. I should have more detailed information tomorrow.

### OPTION 3

#### On-Screen Advertising

We could look at "On Screen Advertising" ("pre-screening slides"). Companies who sell this type of advertising handle certain groups of theatres in different areas of the County. We contacted National Cinema Network and obtained a rate sheet and list of theatres they handle (see attached). They are developing an updated list which I will have later this week. Rates are structured on the number of screens at the theatre, circulation (patronage) and by the week. They have "Special Program Rates" for PSAs and I was told that if we selected a group of theatres they may be able to work with us a bit more on the price.

**Rough Cost Estimate:** For example, if you selected 10 theatres at average cost of \$350/week, you could spend \$3,500 a week and \$14,000 a month to advertise your message.

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# CITY OF CARSON

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April 11, 1996

Gary Hildebrand  
900 South Fremont Avenue  
Alhambra, CA 91803-1331

RE: Attendance at EAC meeting of April 16, 1996 and Report on Informal meeting  
with Board Staff

Dear Mr. Hildebrand:

I am sorry to inform you that I will be unable to attend the EAC meeting of April 16, 1996 as I will be on vacation. Attachment "A" to this letter contains my comments on the agenda items.

I would also like to report to the EAC that I participated in a 2 day informal work session with the City of West Hollywood, City of Los Angeles, County of Los Angeles, our City Attorney, Heal the Bay and Board staff.

Several chapters of the December version of the draft permit had been re-written and the Board staff wanted a preliminary review of the language for consistency and to see if the language made sense. This was not a negotiating session. The meeting was not intended to supersede or sidestep the established review/comment process by the individual cities, the Negotiating Committee, and the EAC.

Don Wolfe can fill you in on the details of the work session.

Just so that there is no misunderstanding, I want to make it clear that I have no opinion as to the acceptability or unacceptability of the provisions of the document at this time. This will require a thorough review of the entire rewritten document.

Sincerely,

*John Wisz*  
JOHN WISZ, P.E.  
Civil Engineering Associate

cc: (all w/o attachments)

Lawrence Olson, City Administrator  
George J. Schultz, P.E., Director of Engineering Services  
John Harris, Richards, Watson & Gershon  
Sharon Perlstein, City of Santa Monica  
Cathrine Tyrrell, Los Angeles Regional Water Quality Control Board  
Mark Gold, Heal the Bay

0577



HARRY W. STONE, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone (818) 458-5100

To: BTB  
From: Catherine

Any suggestions?  
Tomasky Winnie

to prepare response

ADDRESS ALL CORRESPONDENCE TO  
PO BOX 1400  
ALHAMBRA, CALIFORNIA 91802-1400

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April 23, 1996

IN REPLY PLEASE REFER TO FILE EP-3

Ms. Catherine Tyrrell  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Ms. Tyrrell:

**PROPOSED NPDES PERMIT ADOPTION SCHEDULE**

At the April 16, 1996 Executive Advisory Committee (EAC) Meeting, the EAC members expressed concern regarding your proposed NPDES Municipal Permit adoption schedule. It is our understanding that the schedule is as follows:

<u>Activity</u>	<u>Completion Date</u>
Mail out Response to Comments and Draft Tentative Order (Permit) (including fact sheet) to Permittees and Interested Parties	Late April
Workshop with Stakeholders	Late May
Deadline for Comments	Late June
Regional Board Meeting for Consideration of Tentative Order	July 15

We are concerned that you have not allowed sufficient time for your staff to respond to comments received from circulation of the Tentative Order.

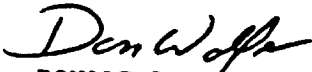
It is also our understanding that the Tentative Order circulated for comments in late April will be the same Tentative Order presented to the Regional Board. Your Response to Comments received on the April circulation of the Tentative Order will be presented to the Regional Board as a separate item. This insures that the Regional Board views the same permit as that circulated, and also reviews the comments received on the Permit.

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Ms. Catherine Tyrrell  
April 23, 1996  
Page 2

The EAC would appreciate a written response to confirm the schedule and identifying the process for adoption of the Permit. If you have any questions, please contact me at (818) 458-4014.

Very truly yours,



DONALD L. WOLFE  
Executive Advisory Committee Chair

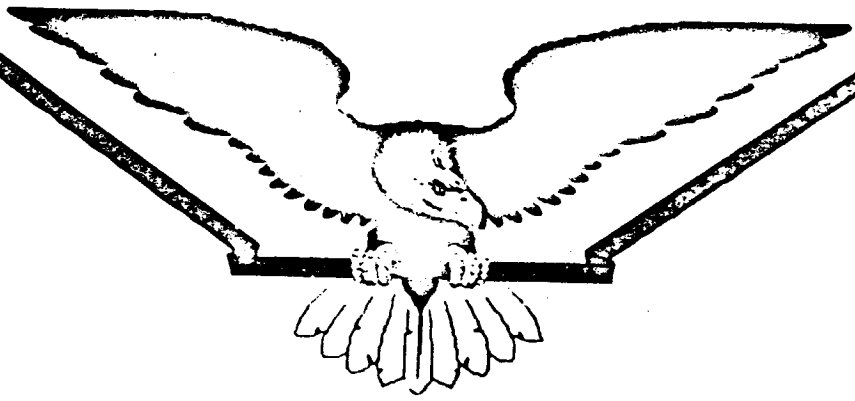
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Date:	<u>4-26-96</u>

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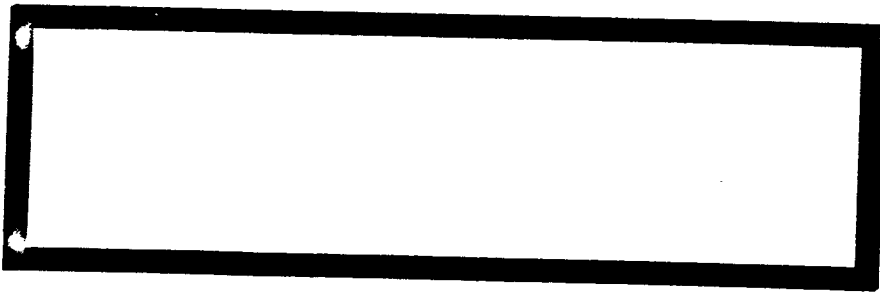
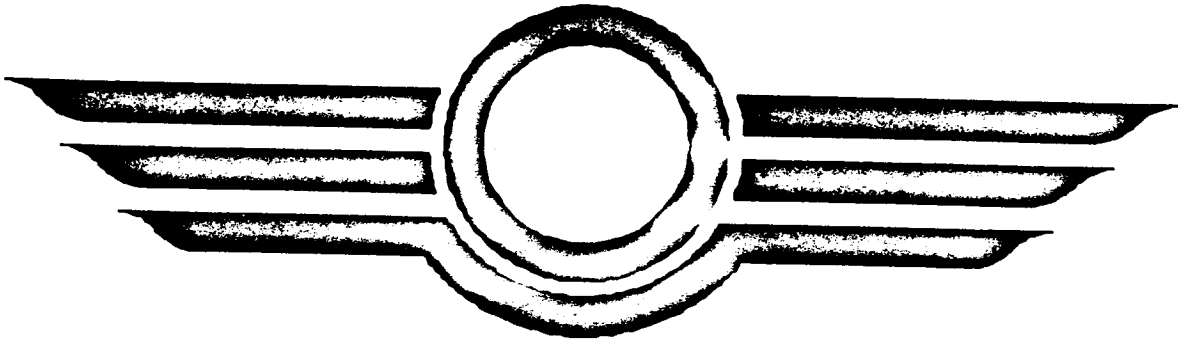
# Zachary Jackson

*Downtown L.A.*  
213/627-6701

*Newport Beach*  
714/851-3022

*Century City*  
310/552-2903

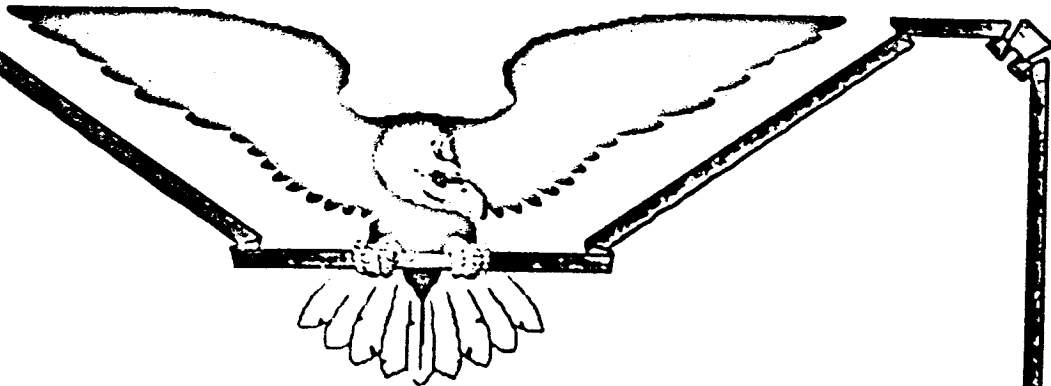
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# Zachary Jackson

Downtown L.A.  
213/627-6701

Newport Beach  
714/851-3022

Century City  
310/552-2903

## Certificate Of Authenticity

This Is To Certify That The Micro Photographs Appearing On This Reel Of Film

Roll #: VOLUME # 9

Starting With: 0001

Ending With: 0579

Are Accurate Representations Of All Documents

Produced For: \_\_\_\_\_

Case Name: \_\_\_\_\_

Date Microfilmed: 5 - 13 - 98

Filming Location: CAL. REG. WATER QUALITY CONTROL BOARD  
101 CENTRE PLAZA DR, MONTEREY PARK

Camera Operator: DAVID W. SPENCE David Spence  
Print Name Signature

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copy to the County?

LAW OFFICES  
**BURKE, WILLIAMS & SORENSEN**

811 WEST SIXTH STREET, SUITE 2500  
LOS ANGELES, CALIFORNIA 90017  
(213) 236-0800

VENTURA COUNTY OFFICE  
2310 PONDEROSA DRIVE  
SUITE 1  
CAMARILLO, CALIFORNIA 93010  
(805) 987-3488

ORANGE COUNTY OFFICE  
3200 PARK CENTER DRIVE  
SUITE 750  
COSTA MESA, CALIFORNIA 92626  
(714) 645-8888

TELECOPIER: (213) 236-2700

FRESNO OFFICE  
8496 NORTH PALM AVENUE  
SUITE 101  
FRESNO, CALIFORNIA 93704  
(208) 281-0163

BURKE, WILLIAMS, SORENSEN & GAAR  
LIGHTON PLAZA  
7300 COLLEGE BOULEVARD  
SUITE 220  
OVERLAND PARK, KANSAS 66210  
(913) 538-8200

WRITER'S DIRECT DIAL:  
213-236-2621  
Internet: ryoung09@courtsol.com  
OUR FILE NO. 00006-803

December 28, 1995

Ms. Catherine Tyrrell  
Assistant Executive Officer  
Surface Water Programs  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, California 91754-2156

Re: **Draft Waste Discharge Requirements for the Discharge of Storm Water in  
Los Angeles County**

Dear Ms. Tyrrell:

Please add me and the City Attorneys listed on the enclosure to the MAILING LIST,  
DRAFT STORM WATER PERMIT FOR THE COUNTY OF LOS ANGELES.

In addition, please provide each of the listed City Attorneys with notices of individual  
watershed area meetings for the watershed(s) in which their respective cities are located.  
Thank you for your anticipated cooperation.

Very truly yours,

RUFUS C. YOUNG, JR.  
for BURKE, WILLIAMS & SORENSEN

- cc: Carl K. Newton, Esq.
- Leland C. Dolley, Esq.
- Cheryl J. Kane, Esq.
- Michele R. Vadon, Esq.
- Mary Redus Gayle, Esq.

Enclosure

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LOS ANGELES REGION  
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**ENCLOSURE**

**LOS ANGELES COUNTY CITY ATTORNEYS**

Carl K. Newton, City Attorney  
CITY OF SANTA CLARITA  
c/o Burke, Williams & Sorensen  
611 W. Sixth St., Suite 2500  
Los Angeles, California 90017

Leland C. Dolley, City Attorney  
CITY OF ALHAMBRA  
c/o Burke, Williams & Sorensen  
611 W. Sixth St., Suite 2500  
Los Angeles, California 90017

Leland C. Dolley, City Attorney  
CITY OF EL SEGUNDO  
c/o Burke, Williams & Sorensen  
611 W. Sixth St., Suite 2500  
Los Angeles, California 90017

Cheryl J. Kane, City Attorney  
CITY OF DOWNEY  
c/o Burke, Williams & Sorensen  
611 W. Sixth St., Suite 2500  
Los Angeles, California 90017

Michele R. Vadon, City Attorney  
CITY OF LOMITA  
c/o Burke, Williams & Sorensen  
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Los Angeles, California 90017

Michele R. Vadon, City Attorney  
CITY OF BELLFLOWER  
c/o Burke, Williams & Sorensen  
611 W. Sixth St., Suite 2500  
Los Angeles, California 90017

Mary Redus Gayle, City Attorney  
CITY OF GLENDORA  
c/o Burke, Williams & Sorensen  
Ventura County Office  
2310 Ponderosa Dr., Suite 1  
Camarillo, California 93010

Rufus C. Young, Jr., Special Counsel  
CITIES OF ALHAMBRA AND SANTA  
CLARITA  
c/o Burke, Williams & Sorensen  
611 W. Sixth St., Suite 2500  
Los Angeles, California 90017

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION



101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600

December 28, 1995

To the Members of the Public Outreach Committee of the  
Los Angeles County Municipal Storm Water Discharge Permit

**PUBLIC EDUCATION SECTION OF THE DRAFT LOS ANGELES COUNTY  
MUNICIPAL STORM WATER DISCHARGE PERMIT**

I understand that during the November 14, 1995, meeting of the Public Outreach Committee, the members requested copies of the Public Education section of the draft permit for their review. On December 18, 1995, Regional Board staff sent out a revised draft of the permit. Attached please find your copy of the Public Education section of the said draft.

In response to the permittees' comments, we made significant changes in the Public Education section. Some permittees wanted a checklist type section which indicates what has to be done and when. Others commented that this section is so different from other permit requirements that it warrants an alternative approach. We also considered that some permittees have already implemented public education programs for municipal staff and the general public, some have directed outreach efforts to specific industries, and others have covered these three audiences.


As you read through the attached Public Education section, you will find that permittees have great flexibility in developing and implementing educational programs. There are requirements for immediate implementation and to develop a five year public education strategy. The immediate requirements may be satisfied by the use and/or adaptation of existing state-wide or nation-wide educational tools. The intent is for the permittees to work together and share resources in order to minimize the financial burden.

We believe the attached Public Education section addresses the comments and concerns of the permittees. Nevertheless, we would appreciate any further comments to make the section more effective towards reducing, if not eliminating, pollutants in storm water. **Please note that written comments on the entire draft permit (including the attached section) are due to this Board by January 29, 1996.** This will give staff time to consider the additional comments before the tentative permit is disseminated for public comments during the last week of February.

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Public Outreach Committee Members  
December 28, 1995  
Page 2

We thank you for your time and cooperation. If you should have any questions or need a copy of the entire draft permit, please call me at (213)266-7598.



CARLOS M. URRUNAGA  
Environmental Specialist

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX (213) 256-7600



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December 22, 1995

Mr. Phil Richardson  
Department of Public Works  
City of Los Angeles  
600 So. Spring Street, 4th flr  
Los Angeles, CA 90014-1952

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT MUNICIPAL  
GUIDANCE DOCUMENT MEETING ON JANUARY 8, 1996**

As you know, the consulting firm Camp Dresser and McKee is in the process of developing a guidance document to assist the Permittees in understanding the draft Los Angeles County Municipal Storm Water Permit. Since you have expressed a willingness to be involved in the development of this guidance document, we hope that you attend a meeting with the consultants on January 8, 1996, at our offices in Monterey Park at the address above. The meeting will begin at 9 am and last approximately 2 hours.

With the completion of the draft permit (December 18, 1995 version), the consultants are now in the process of preparing the following:

Sections which are intended to detail or clarify permit requirements for the guidance document holder; and

Sections which detail the responsibilities and activities to be undertaken by the Principal Permittee, Permittees and/or committees and by when.

We sincerely would like to have your input on the guidance document, particularly on these two sections. The consultants would like to know from the regulated community's perspective, which sections of the draft permit (of the Dec 18, 1995 version) need the most clarification.

We look forward to seeing you on January 8, 1996, and thank you for your assistance and contribution towards the development of this document. Until I see you on January 8, I wish you and yours a Happy Holiday Season and a Prosperous New Year! If you have any questions please feel free to call me directly at (213)266-7598.

CARLOS URRUNAGA  
Environmental Specialist

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600



December 22, 1995

Mr. Ora Lampman  
Department of Public Works  
City of Burbank  
275 E Olive Ave  
Burbank, CA 91502-1267

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT MUNICIPAL  
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We look forward to seeing you on January 8, 1996, and thank you for your assistance and contribution towards the development of this document. Until I see you on January 8, I wish you and yours a Happy Holiday Season and a Prosperous New Year! If you have any questions please feel free to call me directly at (213)266-7598.

CARLOS URRUNAGA  
Environmental Specialist

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



1500 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600

December 22, 1995

Mr. Don Wolfe  
Department of Public Works  
County of Los Angeles  
900 So. Fremont Avenue  
Alhambra, CA 91803

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT MUNICIPAL  
GUIDANCE DOCUMENT MEETING ON JANUARY 8, 1996**

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Environmental Specialist

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2136  
(213) 266-7500  
FAX (213) 266-7600



December 22, 1995

Mr. Fullmer Chapman  
Department of Public Works  
City of La Cañada Flintridge  
1327 Foothill Bl  
La Cañada Flintridge, CA 91011-2137

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT MUNICIPAL  
GUIDANCE DOCUMENT MEETING ON JANUARY 8, 1996**

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
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December 22, 1995

Ms. Cynthia Kurtz  
City of Pasadena  
100 N Garfield Ave, Rm 212  
Pasadena, CA 91101-7215

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT MUNICIPAL  
GUIDANCE DOCUMENT MEETING ON JANUARY 8, 1996**

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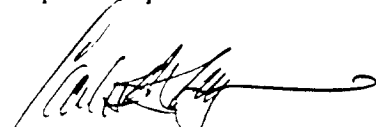
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December 22, 1995

Mr. Sam Wise  
Rolling Hills Estates  
4045 Palos Verdes Dr, North  
Rolling Hills Estates, CA 90274-2596

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT MUNICIPAL  
GUIDANCE DOCUMENT MEETING ON JANUARY 8, 1996**

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
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December 22, 1995

Ms. Nancy Delange  
Department of Public Works  
City of Santa Clarita  
23920 Valencia Bl, Ste # 300  
Santa Clarita, CA 91355-2175

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT MUNICIPAL  
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CARLOS URRUNAGA  
Environmental Specialist

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
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FAX: (213) 266-7600



December 22, 1995

Mr. Craig Perkins  
Department of Public Works  
City of Santa Monica  
1685 Main St  
Santa Monica, CA 90401-3295

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT MUNICIPAL  
GUIDANCE DOCUMENT MEETING ON JANUARY 8, 1996**

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Environmental Specialist

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
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(213) 266-7500  
FAX: (213) 266-7600



December 22, 1995

Mr. Tom Kennedy  
Department of Public Works  
City of Vernon  
4305 S Santa Fe Ave  
Vernon, CA 90058-1786

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT MUNICIPAL  
GUIDANCE DOCUMENT MEETING ON JANUARY 8, 1996**

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December 22, 1995

Ms. Susan Damron  
Department of Water & Power  
111 N. Hope Street Rm 1116  
Los Angeles, CA 90012

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT MUNICIPAL  
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CARLOS URRUNAGA  
Environmental Specialist

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
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December 22, 1995

Ms. Dee Zinke  
Building Industry Association  
of LA/Ventura  
24005 Ventura Blvd  
Calabasas, CA 91302

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT MUNICIPAL  
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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

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December 22, 1995

Ms. Amy Glad  
Building Industry Association  
of Southern California  
1330 So. Valley Vista Drive  
Diamond Bar, CA 91765

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT MUNICIPAL  
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December 22, 1995

Ms. Melissa Beard  
California Environmental Associates  
423 Washington Street  
3rd Floor  
San Francisco, CA 94111

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December 22, 1995

Ms. Gail Feuer  
Natural Resources Defense Council  
6310 San Vicente Blvd, Ste 250  
Los Angeles, CA 90048

**LOS ANGELES COUNTY MUNICIPAL STORM WATER PERMIT MUNICIPAL  
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Mr. Dick Hingson  
Sierra Club Angeles Chapter  
3345 Wilshire Blvd  
Suite 508  
Los Angeles, CA 90010

Ms. Joan Hartman  
American Oceans Campaign  
725 Arizona Avenue, Suite 102  
Santa Monica, CA 90401

Mr. Eugene Bromley  
Water Management Div.,(W-5-1)  
USEPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

California Department of Fish and Game  
Mr. Bill Paznokas  
330 Golden Shore, Suite 50  
Long Beach, CA 90802

California Trout  
Mr. Jim Edmondson  
870 Market Street, Suite 859  
San Francisco, CA 94102

Friends of the Los Angeles River  
Mr. Jim Danza  
P. O. Box 292134  
Los Angeles, CA 90029

Mr. Jim Danza  
1235 Appleton St. #4  
Long Beach, CA 90802

Friends of the Santa Clara River  
Mr. Ron Bottorff  
660 Randy Drive  
Newbury Park, CA 91320

San Gabriel Basin Watermaster  
Mr. John Maulding  
425 East Huntington Dr., Suite 200  
Monrovia, CA 91016

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however, the submitted plans were determined to be incomplete and inadequate in proposed program components necessary to reduce pollutants in storm water to the "maximum extent practicable" as required by CWA Section 402(p)(3)(B). Therefore, the submitted plans served as partial bases for the development of the SWMP requirements of this Order.

29. Each Permittee under the existing permit (Order No. 90-079), was required to implement Best Management Practices (BMPs), conduct monitoring of storm water discharges, and evaluate their impacts on receiving waters. Information obtained from these activities would have provided a basis for establishing numerical criteria or goals, and in lieu of specific program requirements. However, these activities were not fully accomplished during the five-year term of the permit. Storm water criteria development has been recently sponsored by the USEPA in partnership with the Water Environment Federation.
30. The SWMP required in this Order contains the components developed by the State Board's Urban Runoff Task Force in consultation with the State Storm Water Quality Task Force described in Finding 27 and with the cooperation of representatives from the Permittees, environmental groups, and the industrial community.

The SWMP includes requirements with compliance dates to provide specificity and certainty of expectations. It also includes provisions that promote customized initiatives, both on a countywide and watershed basis, in developing and implementing cost effective measures to minimize discharge of pollutants to the receiving water.

The various components of the SWMP, taken as a whole rather than individually, are expected to reduce pollutants in storm water to the "maximum extent practicable". The Permittees are required to conduct annual evaluations on the effectiveness of the Storm Water Management Program, and, if necessary, institute modifications to meet this criterion.

31. This Order provides Permittees the flexibility to petition the Executive Officer to substitute a BMP included under the requirements with an alternative BMP, if they can provide scientific information and documentation on the effectiveness of the alternative, equal to or greater than the prescribed BMP.
32. Besides the above referenced state and federal laws and regulations, and water quality control plans, the requirements in this Order are also based on the following guidelines, studies, considerations, reports and events:
  - a. Board Order 90-079 required the development and implementation of BMPs to minimize pollutants in storm water to receiving waters. The Order was written to allow maximum flexibility in developing pollution prevention programs. The BMPs identified by Permittees for implementation were often dissimilar and implementation was scattered. In 1993, the Regional Board approved thirteen baseline minimum BMPs to facilitate the implementation of countywide minimum requirements, to encourage countywide consistency, and provide a minimum measure of progress. These BMPs were selected from Permittees' MS4 programs. The thirteen BMPs have been made a part of this

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Order. These BMPs are: (i) Catch basin labeling, (ii) Public illicit discharges reporting, (iii) Construction storm water ordinance, (iv) Public education and outreach, (v) Catch basin clean-out, (vi) Roadside trash receptacles, (vii) Street sweeping, (viii) Inspections of vehicle repair shops, vehicle body shops, vehicle parts and accessories, gasoline stations and restaurants, (ix) Proper disposal of litter, lawn clippings, pet feces, (x) Removal of dirt, rubbish and debris by homes and businesses, (xi) Oil, glass and plastics recycling, (xii) Proper disposal of household hazardous wastes, and (xiii) Proper water use and conservation.

- b. In November 1992, the USEPA issued guidance for submittal of Part II application for MS4s. This guidance provides clarification on specific municipal storm water program requirements that were not available to the Regional Board when Order 90-079 was adopted. This Order incorporates these requirements to be consistent with the USEPA guidance.
- c. The Regional Board is the enforcing authority for the two statewide general permits, described in Finding 10, which are issued to facilities in Phase 1 of the Federal Storm Water Program (40 CFR 122.26). However, frequently, the industrial and construction sites discharge directly into storm drains and/or flood control facilities owned and operated by the Permittees. These industrial and construction sites are also regulated under local laws and regulations. Therefore, a coordinated effort between the permittees and the Regional Board is critical to avoid duplicative storm water regulatory activities and promote storm water program efficiency.
- d. The State Board adopted a dual annual fee structure for industrial facilities in the Phase 1 Program. Phase 1 facilities located in jurisdictions with a MS4 permit are subject to a lower annual fee (\$250) than those industrial facilities in areas without a MS4 permit (\$500). The dual fee structure was adopted to allow Permittees to recover the annual fee differential or portion thereof if necessary to support the MS4 program and also provide some oversight over Phase 1 facilities.
- e. The ROWD indicates that the Permittees have established a subcommittee to develop an enforcement/compliance strategy for industrial and commercial facilities and construction sites. The Permittees have agreed to notify Regional Board staff of industrial and construction facilities which may not be in compliance with the storm water regulations. The ROWD also indicates that the Permittees will ensure that no grading and/or building permits are issued without proof of compliance for those projects subject to the GCASP.
- f. Each Permittee owns/operates facilities where industrial or related activities take place and/or enters into contracts with outside parties to carry out activities that may impact storm water quality. These facilities and related activities include, but are not limited to, street sweeping, catch basin cleaning, maintenance yards, vehicle and equipment maintenance areas, waste transfer stations, corporation and storage yards, parks and recreational facilities, landscape and swimming pool maintenance activities, storm drain system

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submitted in response to requirements of this Order and will provide them with an opportunity for a public hearing and/or an opportunity to submit their written views and recommendations. The Regional Board will consider all comments and may modify the reports, plans, or schedules or may modify this Order in accordance with the NPDES permit regulations. All submittals required by this Order conditioned with acceptance by the Executive Officer will be subject to these notification, comment, and public hearing procedures.

36. A municipal storm water program companion guidance manual is being developed under contract to provide guidelines and assist Permittees in complying with this Order. Permittees who have graciously contributed funds to develop the guidance manual, include the County of Los Angeles, and the cities of Culver City, La Canada Flintridge, Los Angeles, Pasadena, Rolling Hills Estates, Santa Clarita, Santa Monica, and Vernon.
37. The requirements in this Order, as they are met, are in conformance with federal and state laws regulations, and guidelines developed for the implementation thereof, and water quality control plans applicable to the Los Angeles basin.
38. The action to adopt a NPDES permit is exempt from the provisions of the California Environmental Quality Act; Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code in accordance with Section 13389 of the California Water Code.
39. This Order may be modified or alternatively revoked or reissued, prior to the expiration date to include: changed conditions identified in technical reports; incorporate applicable requirements of statewide water quality control plans; incorporate amendments to the Basin Plan; and to comply with any applicable requirements, guidelines, or changes issued or approved under Section 402(p) of the Clean Water Act, if the requirement, guideline or regulation so issued or approved contains different conditions or additional requirements not provided for in this Order. The Order as modified or reissued shall also contain any other requirements of federal or state laws, regulations and guidelines applicable at that time.

The Board, in a public hearing, heard and considered all comments pertaining to the tentative waste discharge requirements (30) days from the date of its adoption provided the Regional Administrator, USEPA, has no objections.

IT IS HEREBY ORDERED that the County of Los Angeles and the Cities of Agoura Hills, Alhambra, Arcadia, Artesia, Azusa, Baldwin Park, Bell, Bellflower, Bell Gardens, Beverly Hills, Bradbury, Burbank, Calabasas, Carson, Cerritos, Claremont, Commerce, Compton, Covina, Cudahy, Culver City, Diamond Bar, Downey, Duarte, El Monte, El Segundo, Gardena, Glendale, Glendora, Hawaiian Gardens, Hawthorne, Hermosa Beach, Hidden Hills, Huntington Park, Industry, Inglewood, Irwindale, La Cañada Flintridge, La Habra Heights, Lakewood, La Mirada, La Puente, La Verne, Lawndale, Lomita, Long Beach, Los Angeles, Lynwood, Malibu, Manhattan Beach, Maywood, Monrovia, Montebello, Monterey Park, Norwalk, Palos Verdes Estates, Paramount, Pasadena, Pico Rivera, Pomona, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, Rosemead, San Dimas, San

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Fernando, San Gabriel, San Marino, Santa Clarita, Santa Fe Springs, Santa Monica, Sierra Madre, Signal Hill, South El Monte, South Gate, South Pasadena, Temple City, Torrance, Vernon, Walnut, West Covina, West Hollywood, Westlake Village, and Whittier, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder and the provisions of the Clean Water Act as amended and regulations and guidelines adopted thereunder, shall comply with the following for the areas under their jurisdictions in the County of Los Angeles:

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**A. DISCHARGE PROHIBITIONS AND RECEIVING WATER LIMITATIONS**

[Discharge Prohibitions and Receiving Water Limits was not included in the September 15, 1995 partial draft that was distributed. The Receiving Water Limitation text is similar to the one proposed by State Board Counsel for consistency among Regions. Please refer to Findings 9, 13, and 14 for information on this issue. The California Storm Water Quality Task Force has an alternative proposal for this Section which will be discussed with State Board Counsel at a meeting in Oakland on December 19, 1995. Consequently, this Section may be subject to modification based on the outcome of that meeting. For purposes of this Order, compliance with the requirements of this Order is the functional equivalent to meeting receiving water limits. The BMPs for storm water, in a sense, are equivalent to effluent limits]

**I. Discharge Prohibition**

Each Permittee shall, within its jurisdiction, effectively prohibit non-storm water discharges into the municipal separate storm sewer system (MS4) and watercourses, except where such discharges are either:

1. In compliance with a separate NPDES permit; or
2. Identified and in compliance with Provision II.D (Requirements for Illicit Connections/Discharges: Non-storm Water Discharges), of this Order.

**II. Receiving Water Limitations**

Water quality objectives applicable to receiving waters in the Los Angeles Basin contained in the Basin Plan (*Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water Quality Control Board, Los Angeles Region, Monterey Park, 1994*) and the Ocean Plan (*Water Quality Control Plan, Ocean Waters of California, State Water Resources Control Board, 1990*), and amendments thereto, shall serve as Receiving Water Limitations and are hereby incorporated in this Order by reference. If applicable water quality objectives are adopted and approved by the State Board after adoption of this Order, the Regional Board may revise or modify this Order, as appropriate.

Based on the above-mentioned water quality objectives, authorized discharges under this Order shall not:

1. Contain the following in concentrations or quantities that cause nuisance or adversely affect beneficial uses of receiving waters:
  - a. Floating materials, including solids, liquids, foams, and scum;
  - b. Suspended or settleable materials;
  - c. Oils, greases, waxes, or other materials that result in a visible film or coating on the surface of the water or on objects in the water;
  - d. Chemical constituents; and,
  - e. Substances that increases biochemical oxygen demand.



- a. Storm water discharges from its municipal separate storm sewer system are not in fact the cause of the exceedance[s]; or,
- b. When storm water from the Permittee's jurisdiction is determined to be the cause of the exceedance[s], the Permittee completes the investigation in a timely manner to determine the persistence, cause, culpability, and impact of the exceedance[s] on the designated beneficial uses of the receiving waters; and, based on the results of the completed investigation and at the direction of the Regional Board, the Permittee evaluates whether the approved CSWMP or WMAP when fully implemented will prevent future exceedance[s]; and
  - i. if the approved CSWMP or WMAP is adequate, the Permittee shall, depending on the persistence and impact of the exceedance[s] on the receiving water, or at the discretion of the Regional Board, accelerate the implementation schedule of BMPs designed to eliminate the exceedance[s], or
  - ii. if the approved CSWMP or WMAP is inadequate, the Permittee shall develop and submit for approval by the Executive Officer, new or revised BMPs with a schedule for implementation to prevent future exceedance[s.] Upon approval, the Permittee shall implement such BMPs and document the progress of implementation and effectiveness thereof in the Annual Reports to the Executive Officer.

**C. STORM WATER MANAGEMENT PROGRAM REQUIREMENTS**

Each Permittee shall implement within its jurisdiction the following:

1. The Storm Water Management Program provisions of this Order. Unless otherwise specified, the compliance date for all segments of the program shall be January 1, 1997.
2. The Countywide Storm Water Management Plan (CSWMP), any of its modifications, revisions or amendments, that will be developed according to the requirements of this Order.  
  
The CSWMP, at a minimum, shall include the components of the Storm Water Management Program defined in this Order and is subject to approval by the Executive Officer of the Regional Board.
3. The applicable Watershed Management Area Plan (WMAP), any of its modifications, revisions or amendments, that will be developed according to the requirements of this Order.

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Each Permittee shall participate in the development of the WMAP for its respective watershed management area through its Watershed Management Committee (WMC). The WMAP shall include the components of a Storm Water Management Program defined in this Order, the CSWMP, and any other applicable requirements to reduce to the maximum extent practicable pollutants in the discharge. Upon approval by the Executive Officer, the WMAP for a particular watershed supersedes the CSWMP.

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**I. REQUIREMENTS FOR PROGRAM MANAGEMENT**

[As requested by several Permittees in their comments on the September 15, 1995 partial draft, the EAC has been relieved of any legal obligation. The primary responsibility for countywide tasks are now delegated to the Principal Permittee, with the EAC acting in an advisory capacity. This Section establishes the framework for cooperation among Permittees. Both the legal authority subsection and the budget subsection are required under Section 402(p) of the Clean Water Act. The legal authority requirements in this Order are made consistent with the requirements of the CWA Section 402(p), and in addition require specific prohibitions described in Section II. Consequently, the legal authority acquired under the Order issued in 1990 before the promulgation of final regulations by the USEPA may be insufficient. Also, in response to comments, concern was expressed regarding WMCs holding closed sessions. The Regional Board wants to ensure that the public has an opportunity to participate in the development of the storm water management programs.

The Administrative Procedures subsection provides Permittees an opportunity to work with the Regional Board to remedy deficiencies in their program prior to the initiation of formal enforcement actions. As always formal enforcement actions against Permittees (such as ACLs, CDOs,) go before the Regional Board where the Permittee has a right to a hearing.

All of the countywide requirements and guidelines will be developed by the Principal Permittee in consultation with the EAC. Permittees provide input through the EAC and the WMC. Standard reporting forms are also developed by the Principal Permittee under the guidance of the EAC, so that each Permittee is not burdened basic program development. However, each Permittee has the sole responsibility for implementing the program requirements. At some point, after all section requirements for countywide storm water management plan (CSWMP) have been developed, and are being implemented, Permittees have the option of developing a separate watershed area management plan (WMAP) to replace the CSWMP. The WMP must contain some components of the CSWMP but can customize others.

Many Permittees complained that the Permit goes into too much detail. Los Angeles County has had a MS4 permit for more than five years and many basic components of the implementation requirements of CWA Section 402(p) are yet to be developed in any coherent manner. USEPA has expressed major concerns with the progress of the Los Angeles storm water program. While other MS4 program throughout the State and elsewhere in the country have developed storm water management plans and implemented them, Los Angeles County municipalities have not. Further program development delay as requested by some Permittees is not in the public interest. Consequently, in this Order components of each Section provide some detail, so that 80+ Permittees understand these requirements. The requirements in this Order are comparable to what is being implemented by other MS4 programs which are described in their respective storm water management plans. The Order should stand alone and be unambiguous, as some Permittees noted in their comments.

Where a Permittee finds any particular BMP requirement impracticable, the Permittee has been given the flexibility to petition for program substitution. However such requests require that sufficient rationale be presented to assure a basis of consistency within the County for business and the public.

Permittees can reduce the cost of the program by working cooperatively with the Principal Permittee and the EAC, to implement these requirements without duplication of effort. In addition, they can look at existing structures and functions within cities to integrate implementation aspects of this Order.]

**A. Principal Permittee**

1. The County of Los Angeles is designated as the Principal Permittee.
2. The Principal Permittee shall:

a. ~~Coordinate permit activities and, by \_\_\_\_\_, convene and chair the area wide Executive Advisory Committee and the~~

**Watershed Management Committees;**

- ~~b. Convene the countywide Executive Advisory Committee (EAC), constituted pursuant to Provision 1.D;~~
- ~~c. Provide personnel and fiscal resources and by \_\_\_\_\_ develop a Baseline Stormwater Management Plan for use in developing a watershed management plan (WMP) for each watershed to develop a Countywide Storm Water Management Plan (CSWMP) which may then be used to develop a Watershed Management Area Plan for each watershed;~~
- d. Convene the Watershed Management Committees (WMCs) upon the designation of representatives to the WMCs, and seek appointment of a chair who will also serve on the EAC;
- e. Provide personnel and fiscal resources for the development of the WMAPs;
- f. Provide personnel and fiscal resources for updating and modification of the Plan and the WMPs modifying the CSWMP and the WMAPs;
- g. Provide technical and administrative support for both Executive Advisory and Watershed Management Committees the EAC, and the WMCs constituted pursuant to Provision 1.E.;
- ~~f. Implement watershed water quality monitoring programs;~~
- h. Provide personnel and fiscal resources to complete by \_\_\_\_\_, the Annual Reports including evaluations of monitoring program data and BMP effectiveness;
- ~~h. Coordinate the implementation of stormwater quality management activities of regional significance (this shall mean that the Principal Permittee shall identify BMPs which are applicable for implementation by permittees watershed wide and area wide), such as public outreach and education;~~
- i. Prepare and forward summaries and evaluations of program compliance for submittal to the Regional Board, upon receipt of information and materials from the WMCs;
- j. ~~With guidance of the EAC, act as liaison between Permittees and the Regional Board on permit issues; and~~
- k. ~~With guidance of the EAC, implement activities Meet all the responsibilities outlined in this Order below for a Permittee and a Principal Permittee.~~





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C. **External Agency Coordination**

1. ~~The Principal Permittee will be provided an updated list of NPDES permits on a quarterly basis through the Regional Board's electronic bulletin board, which may be accessed at (213) 266-7663, for use by each Permittee to identify permitted sources of active non-storm water discharges into the MS4, to verify permitted sources of the existing non-storm water discharges in the storm water drainage system.~~
2. ~~Each Permittee will work with other agencies, to the extent necessary, and report to the Regional Board on recommendations to resolve any conflicts which are identified between the provisions of this permit and the requirements of other regulatory agencies if they deem it necessary. The Permittees will work with other regulatory agencies and report to the Regional Board on recommendations to resolve any conflicts which are identified between the provisions of this permit and the requirements of other regulatory agencies. These agencies, include but are not limited to:~~
  - a. California Department of Fish and Game
  - b. California Department of Toxic Substances Control
  - c. California Coastal Commission
  - d. United States Environmental Protection Agency
  - e. California Department of Transportation
  - f. California Air Resources Board

D. **Executive Advisory Committee (EAC)**

1. ~~The EAC shall consist of a representative of the County of Los Angeles, City of Los Angeles, a representative from the Malibu Creek, Santa Clara. The Executive Advisory Committee shall consist of a voting representative from the County of Los Angeles, the City of Los Angeles, representatives from the Malibu Creek, Santa Clara River, and Dominguez Channel WMAs, and two from the San Gabriel River, Los Angeles River, and the Ballona Creek WMAs, for a total of eleven voting members. The Regional Board Executive Officer will appoint a Regional Board representative, a member of the public, and two industry representatives as non-voting members on the EAC.~~
2. ~~The City Administrator/Public Works Director for the County of Los Angeles and for the City of Los Angeles shall each appoint a representative to the EAC. Other members will be appointed by the WMCs.~~
23. ~~The Principal Permittee shall provide the EAC with the opportunity to:~~

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3. ~~The EAC shall be responsible for:~~

a. ~~Making recommendations on area wide issues to each of the Watershed Management Committees;~~

~~Advise the Principal Permittee on the development of the CSWMP, and countywide programs to be developed by the Principal Permittee;~~

b. ~~Assisting the Principal Permittee in the development of the Baseline Storm Water Management Plan; and~~

~~Coordinate implementation of storm water quality management activities of regional significance (such as watershed-wide and countywide BMPs, public outreach and education;~~

~~Make recommendations on county-wide issues to each WMC;~~

c. ~~Reviewing the Watershed Management Plans as developed by each Watershed Management Committee and provide direction and guidance on the plans for consideration by the Watershed Management Committees;~~

~~Review the WMAPs developed by each WMC and provide direction and guidance for consideration by the WMC;~~

d. ~~Preparing and forwarding unified submittals to the Regional Board upon receipt of information and materials submitted by the Watershed Management Committee in compliance with Permit requirements;~~

~~Assist the Principal Permittee in compiling summaries and evaluations of compliance for submittal to the Regional Board, upon receipt of information and materials from the WMCs;~~

e. ~~Guide Mediate conflict resolution among Permittees and advise the Principal Permittee on its liaison responsibilities to the Regional Board; and~~

~~Coordinating the implementation of pilot projects to target pollutant sources, evaluate BMP appropriateness, and assess effectiveness.~~

E. ~~Watershed Management Committees (WMCs)~~

~~Each Watershed Management Committee shall be comprised of a voting representative from each Permittee for that particular~~

~~watershed management area in the WMA. The Executive Officer of the Regional Board will appoint a Regional Board representative, a member of the public, and an industry representative as non-voting members on each WMC. Regular WMC meetings shall be open to attendance by the public. The WMC may hold closed sessions, at its discretion, to discuss permit related issues.~~

- ~~2. The Malibu Creek, Santa Clara, and Dominguez Channel WMCs shall each appoint one representative to serve on the EAC and to chair the WMC. The San Gabriel River, Los Angeles River, and the Ballona Creek WMCs shall each appoint two representative to serve on the EAC, one of whom will chair the WMC.~~

~~In the interest of minimizing the burden on small cities of participating in the committee process, each WMC's representative to the EAC shall be a Permittee other than the City of Los Angeles, with the largest population. In WMAs with two representatives on the EAC, the WMC as a whole shall select the second representative. Where the population of the EAC representative municipality is less than 100,000, the Principal Permittee will provide some resources to the Permittee in carrying out its role on the EAC.~~

~~The WMC's chair and secretary shall be chosen by the WMC. In the absence of volunteer Permittee(s) for the positions, the Principal Permittee shall assume those roles, until the WMC approves qualified persons.~~

- ~~43. The WMC shall be responsible for under the legal authority of its member Permittees, obtained in H. below:~~
- ~~a. Establishing goals and objectives for the watershed;~~
  - ~~b. Prioritizing pollution control efforts;~~
  - ~~c. Participating in the development of a specific watershed management plan (WMP), based on the Baseline Stormwater Management Plan (Plan);~~
  - ~~c. Develop a WMAP, based on the CSWMP;~~
  - ~~d. Assessing the effectiveness of, prepare revisions for and recommend appropriate changes to the CSWMP and the WMAP;~~
  - ~~e. Coordinating and facilitating the preparation of the annual reports on Permit activities within the watershed for submittal to the Regional Board—a draft of the annual report shall be circulated to each Permittee and the Executive Advisory~~

~~Committee for their review and comments prior to submittal to the Regional Board; and~~

- e. ~~Coordinate and facilitate the preparation of the Annual reports on permit activities within the watershed for submittal to the Principal Permittee, and for review by the EAC before submittal to the Regional Board.~~
- f. Circulate a draft of the Annual report among Permittees for review and comment prior to submittal to the EAC and the Regional Board; and
- g. ~~Facilitate in implementation of this Order by Permittees in the watershed.~~

F. Watershed Management Subcommittees (WMS)

- 1. Subcommittees will may be established by the WMC and/or the EAC, where deemed necessary.
- 2. Each Subcommittee shall focus on specific program areas ~~and provide more specific oversight on the development; on specific program areas and can provide more specific oversight on the development;~~ implementation, and evaluation of selected program areas.

G. Fiscal Resources

~~Each Permittee shall submit an annual budget for its Implementation Plan within 30 days after the budget adoption. The budget shall be summarized and put into a format which identifies the necessary capital and operation and maintenance expenditures necessary to implement the storm water management program. The budget shall provide information such as funding sources, contract services, and cost sharing arrangements for the storm water management programs. Also included shall be a description of any funding shortfalls.~~

~~1. Area Wide Resources—In implementing this Order and the Plan, the Permittees may elect to jointly fund a single program for certain BMPs, such as Public Education, that are area wide in nature. Funding agreements, including budgets and cost per agency, shall be developed.~~

~~2. City Specific Resources—As stated above, each Permittee shall develop an annual budget detailing the cost of implementing Permit related activities within its jurisdiction.~~

~~The Principal Permittee in consultation with the EAC shall prepare a budget summary format for use by each Permittee to report resources available to implement the storm water management program. The budget summary shall include at a minimum, capital~~

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~~and operation and maintenance expenditures; funding sources; staff resources, equipment, support capabilities, contract services; cost sharing arrangements for countywide programs (e.g., Public Education, Commercial/Industrial inspections); and any foreseeable funding shortfalls.~~

~~Each Permittee shall submit to the Principal Permittee, an annual budget summary of resources dedicated for storm water program implementation as required under Section 402(p) of the Clean Water Act, within 30 days of budget adoption by the Permittee's elected local government. A Permittee may provide all necessary data in an alternate format which includes the same information unless directed otherwise by the Executive Officer.~~

~~The Principal Permittee shall submit a fiscal resources summary in its Annual Report to the Regional Board.~~

#### H. Legal Authority

- ~~1. The legal authority that was required of each Permittee under Order No. 90-079 shall continue in effect.~~
- ~~2. The Co-Permittees shall exercise their legal authority and require compliance with this Order and the Plan within its jurisdiction.~~
- ~~3. Each Permittee shall certify that it has legal authority to control discharges to and from those portions of the storm drainage system over which it has jurisdiction. This legal authority may be a combination of statute, ordinance, permit, contract, order or inter-jurisdictional agreements between permittees with adequate existing legal authority and shall, at a minimum, accomplish Items a-f below:~~

~~Each Permittee shall demonstrate that it possesses legal authority necessary to control discharges to and from those portions of the MS4 over which it has jurisdiction, in compliance with this Order. This legal authority may be demonstrated by either a single ordinance or a single guidance document containing all the statutes, ordinances, permits, contracts, orders or inter-jurisdictional agreements among Permittees which govern a Permittee's storm water management activities per guidelines in the *Guidance Manual For The Preparation Of Part 2 Of The NPDES Permit Applications For Discharges from Municipal Separate Storm Sewer Systems*, (EPA 833-B-92-002, November 1992), pages 3-4, and shall, at a minimum, as required by 40 CFR 122.26(d)(2)(i)(D):~~

- ~~e. Control the discharge of spills and the dumping or disposal of~~

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~~materials other than storm water (e.~~

- a. Control the contribution of pollutants to the MS4 by storm water discharges associated with industrial activity and the quality of storm water discharged from sites of industrial activity;
  - b. Prohibit illicit discharges and illicit connections to the MS4 and require removal of illicit connections;
  - c. Control the discharge of spills and the dumping or disposal of materials other than storm water (e.g., industrial and commercial wastes, trash, debris, motor vehicle fluids, green waste, animal wastes, leaves, dirt, or other landscape debris) ~~to the MS4 to the storm drainage system;~~
  - d. Control through interagency or inter-jurisdictional agreements among Permittees the discharge of pollutants from one portion of ~~the MS4 to another;~~ to the storm drainage system;
  - ~~d. Control through interagency or inter-jurisdictional agreements among permittees the contribution of pollutants from one portion of the storm drainage system to another;~~
  - e. Require compliance with conditions in ordinances, permits, contracts or orders; and
  - f. ~~Carry out all~~ Conduct inspection, surveillance and monitoring procedures necessary to determine compliance and non-compliance with permit conditions including the prohibition on illicit discharges to the ~~MS4~~
- ~~4. Each Permittee's legal counsel shall complete a review of its existing legal authority to ensure that its existing legal authority complies with the requirements in this Order.~~
- ~~5. Upon its completion of the legal authority review, or within 60 days of permit adoption, (whichever is sooner) each Permittee shall demonstrate that it has adequate legal authority or provide a schedule for obtaining the adequate legal authority. Guidance for demonstrating adequate legal authority is included within the EPA document entitled Guidance Manual For The Preparation Of Part 2 Of The NPDES Permit Applications For Discharges from Municipal Separate Storm Sewer Systems;~~

~~Each Permittee shall:~~

- a. Provide to the Principal Permittee for submittal to the Executive Officer of the Regional Board within 120 days of the effective date of this Order (which are in lieu of copies of

**Ordinances, regulations, and other legal documents establishing legal authority.**

- i. A statement under penalty of perjury by its representative legal counsel that the Permittee has obtained all necessary legal authority to comply with this Order; and
  - ii. A timely schedule for obtaining adequate legal authority to comply with this Order (if Provision 1.H.3.a.i. is only partially fulfilled).
- b. Exercise full legal authority within its jurisdiction to require compliance with this Order, the Countywide Storm Water Management Plan, and/or the Watershed Management Area Plans.

**I. Program Substitution**

**Any Permittee may petition the Executive Officer to:**

**1. Substitute for any BMP identified in this Order, the CSWMP, or the WMAP, if the Permittee can demonstrate through documentation and/or scientific data, that the proposed alternative BMP:**

**i. will achieve greater or substantially similar reduction in storm water pollutants; and**

**ii. will be implemented within a similar period of time.**

**2. Eliminate any storm water BMP identified in this Order, the CSWMP, and/or the WMAP, for its jurisdiction if it can demonstrate through documentation and/or scientific data, that the BMP is:**

**i. Not technically feasible; or**

**ii. The cost of implementation greatly outweighs the pollution control benefits.**

**The Executive Officer will approve or disapprove the petition in accordance with Provision LJ (Requirements for Program Management Administrative Review).**

**J. Administrative Review**

The administrative review process formalizes the procedure for review and acceptance of reports and documents submitted to the Regional Board under this Order. In addition, it provides a method to resolve any differences in

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compliance expectations between the Regional Board and Permittees, prior to initiating enforcement action.

~~Storm water program documents, including progress reports, program summaries, and implementation and compliance schedules developed by a Permittee under the provisions of this Order shall be submitted to the Executive Officer for approval. The Executive Officer will notify the Permittee and the Principal Permittee of the results of the review and approval or disapproval within 120 days. If the Executive Officer has not responded within 120 days, the Permittee shall implement the submitted CSWMP or NMAE program components without modification.~~

2. If the Executive Officer finds that a Permittee's storm water program is insufficient to meet the provisions of the Permit, the Executive Officer shall send a "Notice of Intent to Meet and Confer (NIMC)" to the Permittee, with specific findings in support of the insufficient determination. The NIMC shall include a time frame by which the Permittee must meet with Regional Board staff.

- ~~2. Upon receipt of a NIMC, the Permittee shall meet and confer with RWQCB staff to clarify the steps to be taken to completely meet the provisions of this permit. The meet and confer sessions shall be for the purpose of developing additions and enhancements to the jurisdiction's stormwater program. The meet and confer period shall conclude with the submittal to and acceptance by the Executive Officer of a written "Stormwater Program Compliance Amendment (SPCA)" which shall include implementation deadlines. The Executive Officer may terminate the meet and confer period after a reasonable period due to a lack of progress on issues and may order submittal of the SPCA by a specified date.~~

~~The Permittee, upon receipt of a NIMC, shall meet and confer with Regional Board staff to clarify the steps to be taken to completely meet the provisions of this permit. The meet and confer sessions shall be for the purpose of developing additions and enhancements to the jurisdiction's storm water program. The meet and confer period shall conclude with the submittal to and acceptance by the Executive Officer of a written "Storm water Program Compliance Amendment (SPCA)" which shall include implementation deadlines. The Executive Officer may terminate the meet and confer period after a reasonable period due to a lack of progress on issues and may order submittal of the SPCA by a specified date. The NIMC shall include a date by which the Permittee must meet with Regional Board staff. Failure to submit an acceptable SPCA by the specified date shall constitute a violation of this Order.~~

- 3b. The Executive Officer will approve or reject the submitted SPCA







~~inspection, clean up, and enforcement are necessary to prevent the discharge of contaminants;~~

4. ~~By each Permittee shall implement a program to identify and eliminate illegal discharges/disposal practices to the maximum extent practicable.~~

~~The program shall, at a minimum:~~

- a. ~~Identify and prioritize problem areas of illegal disposal where inspection;~~  
b. ~~Maintain a surveillance program to detect illegal discharges and disposal into the street system, including, but not be limited to, street use inspections and inspections of vacant facilities;~~

~~Standardized surveillance program to detect illicit discharges;~~

~~Standardized procedures to educate inspectors. Establish procedures to educate inspectors, maintenance workers, and other field staff to notice illicit discharges during the course of their daily activities, and report such occurrences;~~

~~Establish per EAC guidelines spill response procedures; and Standardized record keeping system to document illicit discharges;~~

~~Establish, per EAC guidelines, Standardized enforcement procedures to eliminate illicit discharges/disposal practices.~~

~~Each Permittee shall based on the model program, as appropriate, develop and implement a program to identify and eliminate illicit dischargers by January 15, 1997.~~

C Other Prohibited Activities

1. ~~The Permittees Each Permittee shall prohibit by legal authority, by July 15, 1996, any person from:~~
- a. Causing or allowing illicit discharges to be made into the MS4;
  - b. Establishing using or maintaining an illicit connection to the MS4;
  - c. Littering.
  - d. Disposing of leaves, dirt or other landscape debris into a storm drain; and
  - e. Using any pesticide, fungicide, or herbicide whose sale which has been voluntarily discontinued or is prohibited by the



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- g. Retaining wall drains;
- h. Individual residential car washing;
- i. Residential ~~and commercial~~ roof drains;
- j. Residential swimming pool discharges;
- k. Hydraulic graffiti abatement; and
- ~~l. Flushing of inductive traffic loops (to be discussed).~~

The Executive Officer, upon the presentation of evidence in accordance with Provision II.C.4. (Procedures for Exemption), may include other categories of non-storm water discharges under this sub-section.

### **3. Designated Discharges**

The following non-storm water discharges have been determined by the Executive Officer to be a significant source of pollutants to receiving waters. Each Permittee has one year from the effective date of this Order or in the case of a new designation, one year from the Executive Officer's date of determination to eliminate the discharge, or develop appropriate BMPs to minimize the adverse impacts in accordance with Provision II.C.4. (Procedures for Exemption)

- a. Street washing
- b. Sidewalk washing

The Executive Officer, upon the presentation of evidence, may include other categories of non-storm water discharges under this sub-section.

### **4. Procedures for Exemption**

The Principal Permittee in consultation with the EAC may identify and describe additional categories of non-storm water discharges to be exempted from A. Discharge Prohibitions.1. in the Annual Report to the Executive Officer. The criteria for exemption may include,

- a. Documentation that the discharges are not sources of pollutants to receiving waters;
- b. Special circumstances in which the discharges have been found to be not sources of pollutants to receiving waters;
- c. Prescription of specific BMPs to reduce pollutants to the "maximum extent practicable" and minimize adverse impacts of such sources; and
- d. Established procedures to ensure BMP implementation including performance standards, monitoring and record keeping.

~~1 The Principal Permittee will be provided an updated list of NPDES Permits on a quarterly basis;~~

~~2 Coordination With State Permits~~

~~1 A quarterly summary of illicit connections eliminated shall be submitted with the Annual Report to the Regional Board. The summary shall include a brief description of the investigation, what was being discharged, estimated length of time the discharge was on going, what remedial action was taken, and what happened to the discharge/dumper.~~

~~2 A quarterly summary of illicit connections eliminated shall be submitted with the Annual Report to the Regional Board. The summary shall include a brief description of the investigation, what was being discharged, estimated length of time the discharge was on going, what remedial action was taken, and what happened to the discharge/dumper.~~

~~F Reporting~~

~~1 By \_\_\_\_\_, the EAC shall develop a standard program for Permittees to implement by \_\_\_\_\_ to promote, publicize, and facilitate public reporting of incidents of a hazardous substance entering the storm drain, where the responsible party is not known, to the Regional Board and State of California Office of Emergency Services (OES) at (800) \_\_\_\_\_ and the Federal Hazardous Response Number at (800) \_\_\_\_\_. The Permittees shall implement this program by \_\_\_\_\_.~~

~~Each Permittee shall implement the standard program for reporting hazardous substances entering the storm drain by October 15, 1996.~~

~~1 The Principal Permittee in consultation with the EAC shall develop a standard program by July 15, 1996, for reporting incidents of reportable quantity of hazardous substances entering the storm drain system. The reports shall be made to the State of California Office of Emergency Services (OES) at (800) 852-7550 and the Federal Hazardous Response Number at (800) 424-8802.~~

~~Each Permittee shall implement the standard program to facilitate public reporting by October 15, 1996.~~

~~1 The Principal Permittee in consultation with the EAC shall develop a standard program to promote, publicize, and facilitate public reporting of illicit discharges and illicit disposal practices by July 15, 1996.~~

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include, at a minimum:

- a. All industrial groups regulated under Phase I of the Federal storm water program (40 CFR 122.26; Phase I Facilities).
- b. Other industrial/commercial groups selected by the Principal Permittee in consultation with the EAC and/or the Regional Board from the USEPA Phase II storm water program screening list, such as nurseries, wood product wholesalers, golf courses, cattle ranches, amusement parks, and municipal vehicle service/maintenance facilities (*Storm Water Discharges Potentially Addressed by Phase II of the National Pollutant Discharge Elimination System Program, Report to Congress, Office of Water, USEPA Washington, D.C., Document No. EPA 833-K-94-002*) and other similar documents. The criteria for selection by the Regional Board and/or the Principal Permittee in consultation with the EAC may include,
  - i. Extent of exposure of the industrial/commercial activity to storm water;
  - ii. Types and quality of non storm water discharges;
  - iii. Similarity of industrial/commercial activity to industrial activity regulated under Phase I;
  - iv. Types of chemical contaminants and wastes generated that can become exposed to storm water;
  - v. Existence of duplicate regulatory programs of other agencies that emphasize waste management and minimize exposure of the industrial/commercial activity to storm water;
  - vi. Number of facilities in watersheds;
  - vii. Professional understanding of the industrial/commercial sector waste management practices;
  - viii. Experience of local agency industrial inspection programs; and,
  - ix. Any other information that indicates a significant potential for contamination of storm water.

The database of industrial/commercial facilities for each Permittee's jurisdiction, shall be maintained and updated annually.

- 3. The Principal Permittee shall compile the information submitted by each Permittee into a database of industrial/commercial facilities based on the standard format by July 15, 1997. This database will, in addition to Provision III.A.1, include:
  - a. For each four digit SIC Industry Number, primary activities that might impact runoff discharges (from national or commercial database sources); and

- b. For each four digit SIC Industry Number, primary materials that might impact runoff discharges (from national or commercial database)

**B. Prioritization of Sources**

1. The Principal Permittee in consultation with the EAC shall rank industrial/commercial groups which have been identified in Provision III.A.2, into one of three priority groups: High, Medium and Low, by January 15, 1997. The criteria for ranking may include,
  - a. Predominance of activity in watersheds;
  - b. Existence of other local agency oversight programs that emphasize waste minimization and pollution prevention;
  - c. Past history of industrial/commercial practices; and,
  - d. Potential for contribution of significant amounts of pollutants into storm water.
  - e. Proximity of activity to beneficial uses;
2. Each Permittee shall numerically rank within High, Medium and Low groups, the industrial/commercial facilities grouped by the Principal Permittee in III.B.1, in the order of storm water BMPs implementation oversight, by April 15, 1997. The criteria for ranking by each Permittee may include,
  - a. Predominance of activity;
  - b. Existence of other local agency oversight programs that emphasize waste minimization and pollution prevention;
  - c. Past history of industrial/commercial practices,
  - d. Potential for contribution of significant amounts of pollutants into storm water;
  - e. Proximity of activity to beneficial use as determined by the WMC;
  - f. Relationship between SIC groups and pollutants of concern as determined by the WMC.

**C. Source Control Measures**

1. The Principal Permittee in consultation with the EAC shall develop a checklist of specific storm water BMPs for use by Permittees for each industrial/commercial SIC group which has been prioritized in Provision III.B.1 by July 15, 1996. The BMPs must:
  - a. Address multiple pollutants;
  - b. Initially focus on BMPs such as pollutant source minimization, education, good housekeeping, and site design alternatives; and
  - c. Target source areas and activities with the highest potential to

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generate substantial pollutant loads.

Each Permittee shall use the checklists developed by the Principal Permittee in its industrial/commercial facilities inspection program.

2. Each Permittee shall require through its legal authority by July 15, 1996:
- a. No discharge of untreated wash waters to the MS4 when gas stations, auto repair garages, or similar use facilities are cleaned;
  - b. No discharge of untreated wastewater from mobile auto washing, steam cleaning, mobile carpet cleaning, and other such mobile commercial and industrial operations into the MS4;
  - c. No repair of machinery and equipment in areas exposed to storm water, including motor vehicles, which are visibly leaking oil, fluid or antifreeze;
  - d. Storage away from areas susceptible to or exposed to storm water, of materials containing grease, oil, or other hazardous substances (e.g., motor vehicle parts), and unsealed receptacles containing hazardous materials;
  - e. Placement of machinery or equipment that is to be repaired or maintained in areas susceptible to or exposed to storm water, in a manner where leaks, spills and other maintenance related pollutants are not discharged to the MS4;
  - f. Regular sweeping to remove debris from commercial/industrial motor vehicle parking lots with more than twenty-five ~~ten~~ parking spaces that are located in areas susceptible to or exposed to storm water;
  - g. Removal and proper disposal of all fuel and chemical residue, animal waste, garbage, batteries, or other types of potentially harmful materials which are located in areas susceptible to or exposed to storm water;
  - h. Disposal of hazardous waste at an appropriate disposal site, and not in trash containers used for municipal trash disposal; and
  - i. Proper disposal of food wastes by the food service and food distribution industry.

Programs and activities to encourage the above BMPs shall be made part of the CSWMP and the WMAPs.

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**D. Source Inspection**

1. Each Permittee shall develop and implement an industrial/commercial facilities inspection program by October 15, 1996. The inspection shall at a minimum include:

- a. For Phase 1 facilities (40 CFR 122.26), site visits to:
  - i. Consult with a representative of the facility to explain applicable local storm water codes, regulations and ordinances;
  - ii. Review that the facility is in compliance with all municipal storm water codes, regulations, and ordinances;
  - iii. Discuss appropriate BMPs and distribute educational materials;
  - iv. Note that an NOI has been submitted to the State Water Resources Control Board, that a copy of a SWPPP is available on-site, and to notify the Regional Board if an NOI has not been submitted or a SWPPP is not available; and,
  - v. Identify and report problematic facilities to the Regional Board, when deemed necessary by the Permittee.

- b. For all other facilities, site visits to:
  - i. Consult with a representative of the facility to explain applicable local storm water codes, regulations and ordinances;
  - ii. Review that the facility is in compliance with all municipal storm water codes, regulations, and ordinances;
  - iii. Discuss appropriate BMPs and distribute educational materials;
  - iv. Follow-up and take action against problematic or recalcitrant facilities; and,
  - v. Identify and report problem facilities to the Regional Board, when deemed necessary by the Permittee.

2. Each Permittee shall submit a schedule for inspection of industrial/commercial facilities prioritized in Provision III.B.2 by October 15, 1996. The schedule with frequency shall include:

- i. Phase 1 facilities in categories [i] through [ix] and [xi] which have an industrial waste discharge permit or a pretreatment permit, once a year;
- ii. Phase 1 facilities in categories [i] through [ix] and [xi], which do not have an industrial waste discharge permit or a pretreatment permit but have obtained coverage under the GISP, once in five years;

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- iii. Phase I facilities in categories [i] through [ix], which do not have an industrial waste discharge permit, a pretreatment permit or GISP coverage, twice in five years;
- iv. Phase I facilities in category [xi] without an industrial waste discharge permit, a pretreatment permit, or GISP coverage ; contact by phone, mail-out or other similar method, to inform the facilities of notice of intent (NOI) requirements and encourage good storm water quality control measures, once in five years;
- v. Vehicle repair shops, vehicle body shops, vehicle parts and accessories (SIC Industry Major Group 75); three times in five years;
- vi. Gasoline stations (SIC Industry Number 5541); twice in five years;
- vii. Restaurants (SIC Industry Number 5812), twice in five years; and,
- viii. Three or more additional SIC industrial/commercial groups identified by each WMC in consultation with the Principal Permittee/EAC, twice in five years for High, and once in five years for Medium and Low as prioritized in Provision III.B.2.

INSPECTION PROGRAM	INSPECTION SCHEDULE (Inspection / Years)
Phase I, [i]-[ix] and [xi] with waste discharge or pretreatment permit	5 / 5
Phase I, [i]-[ix] and [xi] with no waste discharge or pretreatment permit but with GISP	1 / 5
Phase I, [i]- [ix] with no waste discharge or pretreatment permit, and no GISP	2 / 5
Phase I [xi] with no GISP	1 / 5
Vehicle repair shops, vehicle body shops, vehicle parts and accessories facilities	3 / 5
Gas stations	2 / 5
Restaurants	2 / 5
Facilities selected by WMCs	High 2 / 5 Medium 1 / 5 Low 1 / 5

3. A Permittee may petition the Executive Officer with scientific bases to substitute the industrial/commercial inspection program with an alternative industrial/commercial oversight program that will achieve greater or substantially similar reduction in pollutants released into storm water from industrial/commercial activity, and which will be implemented within a similar period of time. The criteria for the Executive Officer to consider an alternative industrial/commercial oversight program include :

- a. Discharge pollutant characterization data; or
- b. Other quantified measures of pollutant reduction; or
- c. Results of special studies / pilot projects

4. The Principal Permittee in consultation with the EAC shall develop a framework and general guidelines for an enhanced inspection program for industrial/commercial facilities by October 15, 1997. The enhanced inspection program shall be performed by each Permittee at problem and/or recalcitrant facilities as determined by the Permittee. The inspection program shall include, but is not limited to:

- a. Procedures for enhanced facility inspections;
- b. Procedures for enhanced outreach on pollution prevention, waste minimization, and storm water quality management;
- c. Procedures to require corrective action be undertaken by non-complying facilities;
- d. Procedures to follow-up on violations of municipal standards;
- e. Procedures for enforcement action against non-complying facilities; and,
- f. Training for program staff.

#### IV. PROGRAM REQUIREMENTS FOR DEVELOPMENT PLANNING / CONSTRUCTION

[This Section was completely rewritten after discussions with Los Angeles County, the City of Los Angeles, and Heal the Bay. In addition, comments were submitted by the BIA of Southern California. The objective of this Section was to streamline local government permits for grading and construction with State and Federal requirements for storm water and non-point source pollution under Section 402(p) of the Clean Water Act and Section 6217(g) of the Coastal Zone Act Reauthorization Amendments respectively. If this objective is achieved, then local government requirements may be sufficient to establish compliance with CWA and CZARA, eliminating the need for multiple inspections.

While CWA Section 402 requires a separate permit for construction activity on five acres or more, MS4 Permittees are required to establish processes to address storm water pollutants from all construction activity regardless of acreage. Similarly, under CZARA Section 6217(g), management measures have been prescribed jointly by the USEPA and NOAA for construction activity regardless of land size. The management measures in CZARA for construction activity include those to be addressed at the project planning stages to avoid costly restoration and retrofit after development/redevelopment. Failure to integrate requirements of the two statutes at this stage may render this Order inadequate under CZARA and require additional permits later under the authority of the Coastal Commission.

The prioritization criteria developed by the Regional Board, the County of Los Angeles, the City of Los Angeles, and Heal the Bay, create simple categories to limit the scope of the construction activity program and is considered reasonable. However the thresholds for the prioritization are still under discussion. For example, it comments sent to Board staff have pointed out that current thresholds for "Priority" would exclude fast food restaurants, gas stations, multi-unit apartments, and high rise buildings, from preparing a plan. Similarly, the 100,000 square feet "high priority" threshold would exclude supermarkets, mini-malls, and promenades which would greatly benefit from BMPs. It has been pointed out to Board staff that some Permittees have development permitting requirements that are more stringent than provided by the prioritization criteria. Further, MS4 Permittees are required to address all significant sources of pollution in storm water including parking lots under CWA Section 402(p). In addition, the State of Washington uses a threshold of 5,000 square feet for specific plan and BMP requirements (*Storm Water Management Manual for the Puget Sound Basin, Washington State Department of Ecology, 1992, Document No. 91-75*). Storm water pollution from parking lots has been shown by the USEPA and the Western States Petroleum Association to be comparable with pollution from automotive service facilities.

This Section is divided into two sub-sections; the first under Planning primarily develops countywide guidelines to ensure consistency. The second under Development construction attempts to streamline construction activity local agency permitting processes and requirements.]

Development increases the amount of pollutants in an area and loss of pervious surfaces. Storm water transports sediment from construction sites and improperly managed construction site materials into streams and rivers destroying fish, wildlife, and natural habitats. Many pollutants also bind to sediment. In addition, increase in impervious surfaces increases the velocity and volume of storm water, which can erode stream banks, raise turbidity pollution and stream temperature, and cause flooding. Proper development planning and implementation of BMPs can reduce the impacts associated with construction activity while providing aesthetic and economic benefits (*Economic Benefits of Runoff Controls, USEPA, Office of Wetlands, Oceans, and Watersheds, EPA Document No. 841-S-95-002, 1995*).

##### A. DEVELOPMENT PLANNING

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1. Prioritization of Development Projects

For unitized development, the common plan of development or sum of all units shall be considered in determining the priority rating of the development.

Requirements for development projects shall be established according to the following categories:

- a. High Priority Projects are development and redevelopment projects with a disturbed area of five acres or more; or development projects creating an impervious area 100,000 square feet or more; or development projects (other than residential accessory building or addition of less than 25 percent of the existing floor area) in designated Biological Habitats (BIOL) in the *Water Quality Control Plan, Los Angeles Region*, which includes, but not limited to, Significant Ecological Areas designated by Los Angeles County and Areas of Special Biological Significance (ASBS) designated by the Regional Board; or a hillside area where the natural slope exceeds 25 percent; or redevelopment of projects meeting the above criteria where the value of the improvements exceeds 50 percent of the value of the existing development. [or ... some physical criterion as opposed to economic. See BIAs comments.]
- b. Priority Projects are development and redevelopment projects with a disturbed area of two or more acres but less than five acres, or projects creating an impervious area of 40,000 square feet or more but less than 100,000 square feet; or any residential accessory building or addition of 25 percent or less of the existing floor area in designated Biological Habitats (BIOL) in the *Water Quality Control Plan, Los Angeles Region*, which includes, but is not limited to, Significant Ecological Areas (SEA) designated by Los Angeles County and Areas of Special Biological Significance (ASBS) designated by the Regional Board; or hillside area where the natural slope exceeds 25 percent; or redevelopment of projects meeting the above criteria where the value of improvements exceeds 50 percent of the value of the existing development; and
- c. Limited Priority Projects are development and redevelopment projects with a disturbed area less than two acres, and an impervious area less than 40,000 square feet, which the Public Works Director (or equivalent municipal authority) determines to potentially significantly affect storm water quality or runoff volume; or any project requiring a grading permit. The Director of Public Works (or equivalent municipal authority) shall develop a documented system, such as a checklist, for determining "potentially significantly effect."

2. Countywide Guidelines

a. The Principal Permittee in consultation with the EAC shall develop, as part of the Countywide Plan, guidelines to encourage watershed protection considerations during planning and permitting of all development projects by October 15, 1996. Guidelines shall be developed to:

- i. Preserve ~~create~~ or restore to the extent feasible, areas that provide water quality benefits, such as riparian corridors and wetlands, and promote the design of development to protect the biological integrity of drainage systems and water bodies;
- ii. Avoid development of areas particularly susceptible to erosion or sediment loss and/or establish development guidance that identifies these areas and protects them from erosion and sediment loss. Such areas include steep slopes, highly erodible soils, intense rainfall zones, and areas of poor re-vegetative capability;
- iii. Promote the integration of storm water quality protection into the design of development projects, including the preservation of native vegetation, the maximization of pervious areas, and the incorporation of cost effective treatment control measures; and
- iv. Maintain peak runoff rates at pre-development levels for development projects and reduce peak runoff rates for redevelopment projects wherever practicable.

b. The Principal Permittee in consultation with the EAC shall develop minimum recommended requirements consistent with the Guidelines for:

- i. Site planning practices;
- ii. Post-construction best management practices; and
- iii. Redevelopment and infill.

3. Planning Process

In order to integrate storm water management considerations into development projects at the time that they are first proposed to jurisdictions, and to support other provisions of this Order:

a. The Principal Permittee in consultation with the EAC shall

develop, as part of the CSWMP Plan, guidelines for consideration by each Permittee to use in preparing/reviewing EIRs, and in linking EIR mitigation conditions to local permit approval by October 15, 1996.

Each Permittee shall incorporate the guidelines in their internal procedures by April 15, 1997.

- b. The Principal Permittee in consultation with the EAC shall develop, as part of the Countywide Plan, a model CEQA checklist form that explicitly addresses watershed, water quality, and nonpoint source pollution impacts by October 15, 1996.

Each Permittee shall use the model CEQA checklist or incorporate its provisions into their existing procedures by April 15, 1997.

- c. Each Permittee shall incorporate watershed and storm water management considerations whenever a Permittee engages in a significant rewrite of the Permittee's General Plan elements for:
- i. Conservation; or
  - ii. Open space; or
  - iii. Land-use; or
  - iv. Public utilities.

4. Planning Control Measures

- a. Each Permittee shall implement a program by January 15, 1997, to inform developers about:
- i. Storm water management;
  - ii. Permittee's legal authorities;
  - iii. Maximization of pervious areas and storm water (where geology and topography permit);
  - iv. Improved infiltration (where geology and topography permit); and
  - iv. Cost effective storm water treatment and control measures.

The program shall provide specific guidance on selecting BMPs to reduce pollutants in storm water discharges from urbanized areas, and include appropriate BMPs, educational materials and reference the *Construction Best Management Practices Handbook, California Storm Water Quality Task Force, Sacramento, CA, 1992*, its revisions, and similar manuals.

- b. Limited Priority Projects: For projects that meet the criteria in Provision IV. A.1.c. for a Limited Priority Project, each



- iii. Roof drainage oriented towards permeable areas on site to the extent practicable;
- iv. Lot drainage oriented towards permeable areas to the extent practicable; and
- v. Storm water from parking lots directed to permeable areas to the extent practicable.

**B. DEVELOPMENT CONSTRUCTION**

**1. Identification of Development Construction Sites**

- a. Each Permittee shall develop a database listing active High Priority and Priority Development Projects within their jurisdiction by January 15, 1997. The initial accuracy of the database will be dependant on the accuracy of electronic and information sources used to establish the database, but the accuracy is expected to improve after Permittees begin to implement the development oversight program. No legal import is to be attributed to the database developed by the Permittees. The database shall be updated quarterly and include at a minimum:
  - i. Contractor name, address, and telephone number;
  - ii. Site address and telephone number;
  - iii. Type of construction activity;
  - iv. Area of development in square feet;
  - v. Cubic yards of grading;
  - vi. Project category: High Priority, Priority;
  - vii. Project sensitivity: if in designated Biological Habitats]; and,
  - viii. Project erodibility: if in a hillside area.
  - ix. NPDES storm water permit coverage status, if applicable.

**2. Countywide Guidelines**

- a. The Principal Permittee in consultation with the EAC shall develop by October 15, 1996, as part of the CSWMP, minimum recommended requirements and BMPs for the High

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Priority, Priority, and Limited Priority development project construction activities. Requirements and BMPs appropriate for each category shall be developed along with checklists for use in design and inspection. The requirements and BMPs shall:

- i. Include construction BMPs;
- ii. Include erosion and sediment control practices;
- iii. Address multiple pollutants;
- iv. Focus on BMPs such as source minimization, education, good housekeeping, good waste management and good site planning;
- v. Target construction activity source areas and activities with the potential to generate substantial pollutant loads;
- vi. Retention on the site to the maximum extent practicable, of sediment, construction waste and other pollutants from construction activity;
- vii. Management of excavated soil on site to minimize the amount of sediment escape to streets, drainage facilities, or adjoining properties;
- viii. Use of drainage controls, as necessary, including but not limited to:
  - a. Detention ponds, sediment ponds, or infiltration pits;
  - b. Dikes, filter berms or ditches;
  - c. Downdrains, chutes or flumes;
  - d. Silt fences.
- ix. Containment of non-storm water from equipment and vehicle washing at construction sites, unless treated to remove sediments and pollutants.

3. Best Management Practices (BMPs)

- i. Each Permittee shall develop a regulatory program by January 15, 1997 for construction activities consistent with the Countywide Guidelines. The Program shall require, prior to the issuance of any construction permit for a development project:



vii. Appropriate training for program staff.

b. During inspection of sites which meet the criteria in Provision IV.A.1.a for a High Priority Project and with a disturbed area of five acres or greater, inspectors shall request to see a copy of the SWPPP. If no SWPPP is available, the Regional Board shall be notified. In addition, each Permittee shall report problem construction sites to the Regional Board.

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**G.V. PUBLIC AGENCY REQUIREMENTS**

[This Section has been written to ensure that pollution prevention measures are incorporated in Permittee municipal activities. The program is developed by the Principal Permittee under the guidance of the EAC. Permittees implement the program once it is developed. Board staff were reminded that municipal activities should be held to a comparable standard with the private sector.]

**A. Examination of Existing Activities**

By \_\_\_\_\_, the Permittees shall develop and begin implementation of a program to examine their existing activities and measures described below to reduce the impact on stormwater quality from their operations.

~~The Principal Permittee in consultation with the EAC shall evaluate existing public agency activities and develop a model program to reduce the impact of public agency activity on storm water quality by January 15, 1997.~~

~~The program shall at a minimum include:~~

**B-A. Sewage Systems Operations**

~~1. All reasonable efforts shall be undertaken to keep sewage spills or leaks from entering the storm drain system. The EAC shall develop procedures for spill response by \_\_\_\_\_.~~

~~1. Procedures to keep sewage spills or leaks from entering the MS4 to the extent practicable;~~

~~2. Control procedures for identifying, repairing, and remediating sewer blockages, and wet weather overflows from the sewers to the storm drain system shall be implemented to protect stormwater quality by \_\_\_\_\_. These procedures shall include, but are not limited to, quick field response to overflows, follow up testing, and complaint investigation.~~

~~2. Procedures to identify, repair, and remediate sanitary sewer blockages, exfiltration, overflow, and wet weather overflows from sanitary sewers to the MS4;~~

~~3. Procedures to respond to overflows, follow-up tests, and investigate complaints;~~

~~3. By \_\_\_\_\_, the Permittees shall insure that field personnel who operate and/or maintain sewer systems have procedural training for field screening, sampling, smoke/dye testing, and TV inspection;~~

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4. Procedures, if applicable, to insure that field personnel who operate and/or maintain sewer systems have been trained in field screening, sampling, smoke/dye testing, and TV inspection, if appropriate; and
5. Procedures to insure that field personnel are trained to investigate any suspected connections or cross connections from the sanitary sewer systems to the MS4.

**B. Public Construction Activities Management**

Storm water management requirements for the design and construction of public facilities comparable to requirements for private development;

Procedures to seek coverage, as an option, under this Order for construction activity listed in Provision IV.A.1. a with a disturbed area of five acres or more (Phase I, 40 CFR 122.26) which are owned and operated by a Permittee if the Principal Permittee in consultation with the EAC develops:

a. A process for notifying the Regional Board of public construction activity owned or operated by the Permittee;

b. A checklist of construction activity BMPs using BAT/BCT criteria for public construction activity;

c. A procedure to verify implementation of construction activity BMPs;

d. A requirement to prepare and retain site specific SWPPPs;

e. A procedure for each Permittee to report annually on the effectiveness of SWPPPs at public construction activity, and certify compliance with this Order;

Each Permittee may seek coverage under this Order for public construction activity in Phase I (40 CFR 122.26), which is owned or operated by the Permittee, in accordance with the procedures developed by the Principal Permittee with the guidance of the EAC. The Executive Officer may exclude any public construction activity identified by a Permittee from coverage under this Provision, if it is determined that the public construction activity is more appropriately covered under a separate individual or general NPDES permit.

**C. Vehicle Maintenance/Material Storage Facilities Management**

1. By \_\_\_\_\_, EAC will develop pollution prevention plans for each Model pollution prevention plan for public vehicle maintenance/material



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1. ~~Eliminating exposure of material to rainfall;~~
2. ~~Checking equipment regularly for leaks; and~~
3. ~~Containing spills.~~

~~Training for employees and contractors on proper outdoor loading/unloading of materials;  
A program shall be developed to prevent or reduce the discharge of pollutants to stormwater from outdoor container storage areas using measures such as:~~

- i. ~~Installing safeguards against accidental releases;~~

~~Structural treatment methods for vehicle and equipment washing areas such as oil/water separators, sumps, sanitary sewer diversions, and equivalents;~~

~~Regular maintenance of treatment structures such as sumps, oil/water separators, and equivalents; and~~

~~Proper waste handling disposal~~

D. Parks and Recreation ~~Facilities Management~~

~~Procedures for application of pesticides, herbicides, and fertilizers that will include:~~

~~List of approved pesticides and preferred selected-use, and fertilizers by \_\_\_\_\_~~

- ii. Product and application information;
- iii. ~~Application~~ equipment use and maintenance; and
- iv. Record keeping.

~~Landscaping waste shall not be discharged into the storm drain system.~~

~~Storage areas for fertilizers and pesticides shall be designed and maintained to reduce exposure to stormwater. The following BMPs shall be utilized where appropriate:~~

- i. ~~Store materials inside or under cover on paved surfaces;~~
- ii. ~~Use secondary containment;~~





**BMPs for Inlet Maintenance to be implemented including but not limited to:**

- a. Inspection and cleaning of catch basins between May 1 and September 30 of each year;**
- b. Maintenance as is necessary of catch basins between October 1 and April 30;**
- c. Record keeping of catch basins cleaned; and**
- d. Recording of the quantity of catch basin waste collected.**

**2. Storm Drain Maintenance**

- a. Material removed from storm drains and catch basins shall be disposed of properly.**
- b. Trash and debris from open channel storm drains shall be removed at least annually between May 1 and October 15 of each year.**
- c. Open channels shall also be monitored during the rainy season for any debris buildup and cleaned where needed.**

**BMPs for Storm Drain Maintenance to be implemented including but not limited to:**

- a. Proper disposal of material removed;**
- b. Removal of trash and debris from open channel storm drains at least annually between May 1 and September 30 of each year;**
- c. Surveillance for debris buildup in open channels during the rainy season.**

**3. Waste Management**

The Permittees shall implement a program by \_\_\_\_\_ to identify problem areas of illegal dumping so regular inspection and clean up can maintain the channel's optimum capacity and prevent the discharge of contaminants.

**Waste Management program to include:**

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~~Procedures to identify and rank problem areas of illicit discharge for regular inspection; and~~

~~Procedures to prevent the discharge of contaminants during MS4 clean up to maintain channel optimum capacity.~~

4. ~~Dry weather storm drain diversion~~

~~The Permittees shall investigate the feasibility of diverting dry weather flows from the storm drain system to POTWs where appropriate. The investigation shall be completed by \_\_\_\_\_.~~

~~Program to investigate the feasibility of dry weather flow diversion from the MS4 to municipal waste water treatment plants where appropriate.~~

~~5. Streets and Roads Maintenance~~

1. ~~Sweeping of curbed streets:~~

a. ~~Sweeping of curbed streets shall occur at least monthly.~~

~~Program to sweep curbed streets:~~

~~At least monthly; and~~

~~Where feasible, areas generating significant refuse more frequently.~~

2. ~~Maintenance~~

a. ~~Existing saw cut management and paving practices conducted by the Permittees shall be evaluated and appropriate control measures developed.~~

b. ~~Paving control measures to be considered that would help reduce the impacts to stormwater include, but are not limited to:~~  
i. ~~Avoid paving during wet weather; and~~  
ii. ~~Store materials away from drainage courses to prevent pollution of stormwater runoff.~~

c. ~~Refuse collected shall be transported to appropriate disposal facilities in accordance with applicable federal, state, and local laws and regulations.~~

d. ~~Good housekeeping practices shall be implemented to insure proper management of any waste products that may be generated during maintenance activities.~~

~~Streets and roads maintenance program including:~~

~~BMPs for existing saw-cut management and paving practices to include but not limited to:~~

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Practices) that can be taken to prevent storm water pollution;

—Raising public awareness of the problems and solutions; and

—Incorporating solutions back into programs, training and BMP implementation.

**A. Immediate Outreach**

1. By July ~~October 15, 1996~~, each Permittee shall, ~~at a minimum~~ develop an outreach program which shall consist of written, audio, and visual materials and, as necessary, translated into appropriate languages or structured for appropriate ages. An implementation schedule shall accompany the program. All elements of the program listed below must be underway by ~~September, 1996~~. The Outreach Program shall target the general public, permittee employees, and the general business community, as well as the industrial, commercial, and construction communities. At a minimum, each permittee's outreach program shall include the following: ~~have available for distribution or reference~~ ~~appropriate the following:~~

**a. Written Material**

- I. Each Permittee shall produce or acquire a variety of ~~Written materials (minimum of three pieces in addition to those listed below for specific audiences) to convey pertinent information regarding storm water management to meet program objectives within County watersheds. Examples of written materials shall include, but are not limited to: flyers, brochures, door hangers, newspaper articles, mail inserts, and newsletters;~~
- II. Each Permittee shall make a reasonable effort to ~~Documentation that a reasonable effort was made to list pertinent City phone numbers under the government pages of phone directories. This should be updated as necessary and should include telephone numbers for reporting clogged catch basin inlets and/or illegal discharges/dumping, and a general number for storm water management program information. These phone numbers may be city-specific or county-wide.;~~



it has been distributed or shown to appropriate community groups or that it has been shown on televised public service stations and cable access programs on a regular basis. Further methods of distribution may include workshops, libraries.

2. ~~Each permittee shall demonstrate by January 15, 1997, that they are:~~  
**Distribution of Materials**

a. ~~Distributing the above outreach materials shall be made available to the general public, or targeted audiences such as schools, community groups, contractors and developers at the appropriate public counters and distributed at public events (e.g., fairs, festivals, public meetings, libraries, community events, school assemblies, and workshops), and,~~

b. ~~Training the appropriate Permittee employees (those whose jobs or activities may contribute to storm water pollution, or those who respond to questions from the public) of the permittee shall be trained in a workshop regarding the requirements of the storm water permit. In particular, where applicable for fire and erosion prevention training, money shall be encouraged as opposed to dishing.~~

~~3. Contractors and developers doing business with the city shall be provided with an accurate, up-to-date listing of storm water management training programs available in the area.~~

3. ~~By January 15, 1997, each Permittee shall complete an analysis of the residents and the businesses in their municipality to assist in identifying public education and outreach goals and target audiences for their municipality in the context of watershed-wide and countywide outreach and education.~~

B. ~~General 5-Year Storm Water Public Education Strategy~~

~~All reasonable efforts to coordinate public outreach efforts shall be undertaken. This may include coordinating with environmental groups and public agencies (e.g., California Coastal Commission, Department of Beaches and Harbors, Resource Agencies, the Metropolitan Water District of Southern California).~~

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1. ~~The Principal Permittee EAC shall develop by January 1, 1997~~ with the guidance and review of a permittee public education committee and the EAC, a 5-year-urban-runoff countywide storm water education strategy which addresses education/outreach issues by watershed as well as countywide. This strategy shall include a schedule for implementation. The intent of the strategy shall be as described in the introduction to this section on page \_\_\_\_\_ ~~to enhance awareness of the impact of storm water pollution on receiving waters and to discourage improper waste disposal practices. Outreach efforts shall be conducted throughout the watershed. The outreach audiences shall be made aware of their responsibility for both the problems and solutions to storm water pollution.~~

~~Upon approval of the Regional Water Quality Control Board, each permittee shall implement its designated responsibilities within the Strategy.~~

~~Development and implementation of the education strategy shall be based on the four objectives listed below:~~

- ~~— Promoting clear identification and understanding of the problem, including activities with the potential to pollute storm water;~~
- ~~— Identifying solutions or applicable measures (Best Management Practices) that can be taken to prevent storm water pollution;~~
- ~~— Raising public awareness of the problems and solutions; and~~
- ~~— Incorporating solutions back into programs, training and BMP implementation.~~

At a minimum, the 5-Year Storm Water Urban-Runoff Education Strategy shall include a full range of outreach tools, from sophisticated media to simple brochures. The strategy will also identify each permittee's responsibilities for implementation and the correlation of each permittee's analysis of target audience with the overall strategy. The strategy shall also include specific quantifiable objectives for changing knowledge and behavior in each of the targeted audiences. ~~include the following elements.~~

At a minimum, the 5-Year Storm Water Education Strategy shall include actions for:

- a. ~~The identification of land uses and activities that have higher potential for storm water pollution based on and will~~



~~include and/or accomplish the following:~~

- ~~I. Pollutants: The reduction of specific-targeted pollutants of concern in a particular watersheds shall be addressed in a focused public education and outreach program ;~~
- ~~II. Activity-specific: Activity-specific outreach programs shall be developed and implemented throughout the watershed using written, audio or visual outreach tools. should address three primary topics: identification of activities potentially causing storm water pollution, implementation of Best Management Practices to prevent storm water pollution, and recognizing and reporting occurrences of storm water polluting activities.~~

~~Each Permittee shall continue to The Permittee shall include develop activity-specific outreach programs that inform residents about the problem of illicit discharges and dumping and that promote, publicize, and facilitate public reporting of these activities. The program shall also include continuing operation, maintenance, and promotion of the county-wide reporting hotline.~~

- ~~b. Permittees shall develop and implement an educational program emphasize the importance of pollution prevention that stresses pollution prevention for a variety of audiences including local residents, school-aged children, businesses and public employees whose job functions and daily lives may impact storm water quality and will include and/or accomplish the following.~~

~~I. For Residents~~

- ~~a. Educate residents on recycling options and household hazardous wastes. The program shall provide information on collection services, including locations and schedule, provide outreach materials on source reduction and proper use, storage, and disposal methods for household hazardous wastes; and continue to encourage residents to recycle (e.g., oil, antifreeze, glass, plastics, batteries);~~
- ~~b. Encourage watershed residents to participate in specific storm water outreach programs.~~

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Residents shall be informed of and provided with the opportunity to share ideas and comments about the programs. Each Permittee shall demonstrate that a good faith effort has been made to outreach to different communities within the watershed.

c. Educate Do-it-yourselfers regarding pollution prevention strategies. Each Permittee shall demonstrate that a good faith effort has been made to outreach to different communities within the watershed or region.

d. Promote public participation through cooperative programs to foster awareness and identification of storm water pollution issues among residents in the watershed. Catch basin labelling and other established sign programs are excellent examples of this type of cooperative effort. One example for cooperative outreach is an "Adopt-A-" program. Residents can "adopt" highways, storm drains, catch basins, or streams to monitor, restore and protect them.

ii. **For K-12 School Children**

School programs shall include information on MS4s, the difference between sanitary sewers and storm drains, the importance of preventing storm water pollution, and also address, illicit discharges/disposal and reporting procedures, source minimization, and general pollution prevention.

iii. **For Businesses**

a. An education and outreach program shall be developed for business operations identified under the inspection programs as having greater potential of discharging pollutants into the MS4. The program shall encourage employee training on, and the effectiveness of storm water pollution prevention practices. In

in addition to written, audio, and visual materials, other possible means of focused outreach may include: conducting workshops, mass mailings, submitting informational articles to trade/industry magazines. Each Permittee shall provide outreach materials through business license renewal counters and/or make efforts to outreach through professional and business associations.

**b.a. For Industrial/Commercial**

A watershed-wide, general outreach program shall be set up by the WMC for all industrial and commercial facilities potentially discharging to the storm drain system. Furthermore, the WMC shall for inspections discussed under section \_\_\_\_\_, provide specific guidance objectives to these facilities regarding storm water program compliance by \_\_\_\_\_, and inform and remind all potential commercial and industrial dischargers of their obligations under the storm water program. The Permittees shall also encourage the proper disposal of all materials from industrial and commercial sites. Prior to the WMC providing specific guidance objectives, subcommittees shall be established, as needed, to develop specific outreach materials for industrial/commercial categories and specific "high priority" activities.

**b. Construction**

An education program shall be developed for construction contractors, owners, builders, and Do-it-yourselfers on proper BMP implementation and maintenance and pollution prevention.

**b. Permittee Employees**

Permittee employees shall be trained on storm water management and pollution prevention practices and the training must involve employees on many different

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levels - from program managers to field personnel. Training programs shall include, but are not limited to, articles in city newsletters, training classes, checklists for field personnel, and interdepartmental forums or committees. Materials developed for other audiences may also be used in Permittee employee training programs. Appropriate public agency employees shall be trained in:

1. Emergency spill cleanup procedures;

2. Environmentally sensitive alternative products;

3. Good housekeeping practices; and

4. NPDES Permitting requirements.

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## VII. REQUIREMENTS FOR MONITORING PROGRAM

[Monitoring Program was drafted last week after Los Angeles County provided language close to the final settlement agreement with NRDC. It may still need some editing in order to reflect the structure of the rest of the permit. Almost all of the monitoring is conducted by Los Angeles County. However, other Permittees are required to conduct five additional critical sources monitoring]

The overall goal of the monitoring program is to develop and support effective watershed monitoring. The objectives include to: i. Track water quality status, pollutant trends, pollutant loads, and pollutants of concern; ii. Monitor and assess pollutant loads from specific land uses and watershed areas; iii. Identify, monitor, and assess significant water quality problems related to storm water discharges within the watershed; iv. Identify sources of pollutants in storm water runoff to the maximum extent possible (e.g., atmospheric deposition, contaminated sediments, other nonpoint or point sources); v. Identify and eliminate illicit discharges; vi. Evaluate the effectiveness of existing management programs, including scientific estimation of pollutant reductions achieved by structural and nonstructural BMPs; and vii. Assess the impacts of storm water runoff on receiving waters. (This may be a coordinated effort among point source dischargers, SCCWRP, State Storm Water Quality Task Force, and other Regional entities).

### A. PLAN

The Principal Permittee shall prepare and retain a Monitoring Plan which will include, at a minimum, description of:

1. Methods for the collection, analysis and interpretation of existing data from monitoring programs within Los Angeles County. These and other data from local, regional or national sources should be utilized to characterize different storm water sources; to determine pollutant generation, transport and fate; to develop a relationship between land use, development size, storm size and the event mean concentration of pollutants; to determine spatial and temporal variances in storm water quality and seasonal and other bias in the collected data; and to identify any unique features of the watershed management areas in the County of Los Angeles. The Permittees are encouraged to use data from similar studies, if available.
2. Rationale for selection of monitoring locations, parameters, number and frequency, and analytical methods.
3. A description of the monitoring program shall include at a minimum:
  - a. The number and location of monitoring stations;

- b. Targeted monitoring indicators (e. g., ecosystem, biological diversity, in stream toxicity, habitat, chemical, sediment, stream health) chosen for monitoring;
  - c. Parameters selected for field screening and for laboratory work and their detection limits;
  - d. Sample collection, handling, storage, and analyses methods in accordance with 40 CFR 136;
  - e. Total number of samples for statistical significance to be collected from each station, receiving water and major outfall monitoring, frequency of sampling during dry weather and short or long duration storm events, type of samples (grab, 24-hour composite), and the type of sampling equipment;
  - f. Uniform guidelines for quality control, quality assurance, data collection and data analyses; and
  - g. Data storage and transfer format, accessibility.
4. Methods for interpreting the results including an evaluation of the effectiveness of the management practices, and need for any refinement of the management practices.
  5. A description of the responsibilities of all the participants in this program including cost sharing.
  6. A description of computer software and modelling programs that will be utilized to assess data, interpret information
  7. A description of how data will be utilized for feedback into the storm water management program.

**B. MONITORING PROGRAM**

**1. Land Use Station Monitoring**

Evaluation of Land Uses

The Principal Permittee will evaluate the location of the land use monitoring stations using a methodology which is described in Attachment B. The methodology is intended to produce a marginal cost-benefit analysis for

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identifying the most important land uses for monitoring in the Los Angeles county. The Principal Permittee will monitor (subject to the station event limitations set forth in Section II(B)(3) below) stations reflecting land uses that are identified through the marginal cost-benefit analysis as appropriate for monitoring. The Principal Permittee will include for monitoring at least five land uses before determining whether there is a point beyond which monitoring would not meet the marginal cost-benefit analysis. Existing land use stations which need to be relocated, based on the methodology, will be relocated. The Principal Permittee will decommission land use monitoring stations which are, as a result of the cost-benefit analysis, not required to be monitored or which reflect duplications.

#### Land Use Monitoring Methodology

##### **Sampler Type**

The Principal Permittee will monitor the land uses selected by the analysis described in Section I(A) above using the same automatic samplers used under the current permit.

##### **Constituents**

The Principal Permittee will analyze samples taken in the automatic samplers for the constituents that were analyzed for automatic samplers under the existing permit. If a constituent is not found, at the method detection limit, in more than 25% of the samples after the first ten sampling rounds (and if it is found in the first ten rounds, thereafter on a rolling basis), it will no longer regularly be analyzed for (unless the few observed occurrences show unusually high concentrations and are cause for concern.). Also, once sufficient storms have been sampled to allow the establishment of an event mean concentration ("EMC") at an error rate of 25% for a constituent at a given location, that constituent will no longer be analyzed for at that location. In addition, the Principal Permittee will conduct annual confirmation sampling for the non-detected constituents for as long as the land use monitoring station remains open (i.e., until all constituent of concern EMCs are calculated or the station is otherwise closed). The land use station shall be operated until the permit term is concluded or until EMCs are derived, at the 25% error rate, for the following detected constituents of concern: PAHs (total); chlordan; Cadmium; Copper; Nickel; Lead; Chromium; Silver; Zinc; Total Suspended Solids; Total Nitrogen; Total Phosphorus

At the time of the closure of a station, EMCs will be calculated for all constituents which have been detected during the operation of the station, although EMCs for non-constituents of concern need not be calculated at the 25% error rate. The list of constituents of concern may be amended by the Regional Board through addition or deletion of constituents; however, if a

constituent of concern is added following the end of the first year of monitoring at the land use stations, the Principal Permittee will [LANGUAGE TO COME]

**Frequency of Monitoring**

The Principal Permittee will monitor at the land use stations at the frequency of a total of 100 station events (defined as the number of stations times the number of storm events monitored) in the first full rainy season after the commencement of the permit, 200 station events in the second full rainy season and 200 station events in the third full rainy season. These station events represent both minimum and maximum numbers, such that the County commits to monitoring at that rate, but not beyond, so long as there are sufficient monitorable storm events. Monitoring after the first three rainy seasons will continue (subject to a maximum 200 station event cap) until EMCs are established for constituents of concern which have been found in the samples or until the permit term ends. (Data from land use monitoring stations under the Order 90-079 that continue to be used as monitoring stations under this Order will be used for establishment of the EMCs; however, use of the data will not reduce the frequency of station events in the first three years of the permit.) When EMCs are determined, monitoring at the land use stations will be ended. Dry weather monitoring will not be conducted at the land use stations, unless such monitoring is required for a special study.

2. **Mass Emission Station Monitoring**

Stations to be Monitored

The Principal Permittee will monitor four mass emission stations, those presently existing on Ballona Creek and Malibu Creek, the Los Angeles River at Wardlow Road and the San Gabriel River. These stations represent the four major drainage points for the watersheds which discharge into the ocean from Los Angeles County. All other existing mass emission stations will be decommissioned.

Monitoring Methodology

**Sampler Type**

The automatic samplers currently installed at the four mass emission stations will continue to be used.

**Constituents**

In addition to the constituents being monitored by the automatic samplers, grab samples will be taken at the mass emission stations to obtain samples for the analysis of constituents being analyzed for grab samples taken under the Order

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loads assessment will be the EPA Simplified Method. The increased frequency of sampling set forth in this monitoring program is intended to provide EMCs for the constituents found in the watershed runoff to be used in a loads assessment model that will be run at the end of the third year of the permit.<sup>1</sup>

5. **Critical Source/BMP Monitoring**

The critical sources monitoring program shall evaluate: i. pollutants of concern and sources, and, ii. specific structural storm water control measures such as, oil/water separators, infiltration, detention, biofilters, and other control measures. The structural control measures must be evaluated as to: effectiveness in reducing toxic pollutants and pollutants of concern; ease of maintenance; current frequency of use; feasibility and cost-effectiveness; and possible methods to ensure implementation if necessary.

Participation

- a. The Principal Permittee shall conduct critical sources/ BMP monitoring to evaluate for industrial/commercial categories, construction activity, and other landuse activity, for five critical source types over six rainy seasons. After the third rainy season, the Principal Permittee will evaluate progress by other municipal entities in California in evaluating critical sources, any monitor three additional critical sources if necessary.
- b. Other Permittees, Medium (population >100,000 but less than 250,000) and large (population 250,000 or more) shall conduct monitoring for five additional critical sources on a watershed basis over five rainy seasons that are not evaluated by the Principal Permittee for: the Ballona Creek and urban areas WMA, Los Angeles River WMA, San Gabriel River WMA, Malibu Creek and rural areas WMA, Dominguez Channel WMA, and Santa Clara River WMA.

Selection of Critical Sources to be Studied

The first phase of the program will be the selection of priority critical sources to be studied. The selection will be made using the following steps:

Step 1: The Principal Permittee first will develop an initial list of candidate critical sources, including industrial and commercial sources that are regulated under the state's General Industrial Activities Permit ("General Permit") and

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<sup>1</sup>In addition to samples taken under the new permit, samples taken at the four mass emission stations and land use stations under the existing permit which will continue to be monitored under the new permit also will be used to develop the loads assessment model.

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those which are not.

**Step 2:** The Principal Permittee next will develop a list of criteria for prioritizing the candidate critical sources developed pursuant to Step 1, including the following: number and/or total area associated with each critical source; runoff pollutants associated with each source; the impact of nonstormwater discharges associated with each source; whether or not the source is regulated under the General Permit; and, ease of implementation of monitoring and BMPs.

**Step 3:** The Principal Permittee next will prioritize the candidate critical sources based on the selection criteria develop under Step 2.

**Step 4:** The Principal Permittee next will conduct a literature review and contact other State municipal stormwater programs to identify what critical sources have been (or are planned in the next five years) to be studied elsewhere. Where studies have been conducted or are planned to be conducted elsewhere, such studies will be reviewed to assess whether the hydrologic conditions in the study area are representative of those in Los Angeles County, the quality of the study and any conclusions from already-conducted studies. This evaluation would be coordinated with the State Stormwater Quality Task Force.

**Step 5:** The Principal Permittee next will take the list developed up to Step 3 and refine and finalize it based upon the review conducted pursuant to Step 4.

#### Study Design

The Principal Permittee shall examine five critical source types over six rainy seasons. The other Permittees shall examine five additional critical source types. Following selection of the candidate sources, and during the 1996-97 rainy season, storm water from the first critical source type will be characterized. The Principal Permittee and other Permittees will seek six similar examples of each critical source type, so as to reduce the amount of variability inherent in sampling only a single example. (Depending upon the availability of finding sufficient examples that can be sampled in a single day with a single crew, the number of test and control sites may be less than three apiece.) Sheetflow from the six sites will be split into two "pools" reflecting three control and three test sites. Sheetflow from each pool, as collected during a targeted five storm events, will be composited into a single sample for analysis. The samples will be analyzed for those pollutants anticipated to be found in the critical source runoff and such analytes will be partitioned, as appropriate, to determine the dissolved and undissolved portions.

Based upon the first year of characterization data, appropriate BMPs will be selected and installed at the test sites. Sheetflow from a target ten storms from the control sources will again be composited and analyzed. With respect to the test sources, one or a variety of non-structural or, possibly, structural BMPs will be instituted at all or some of the test sites. Sheetflow from a targeted ten storm events will be collected and analyzed. (If a structural BMP were installed, only the inlet and outlet of the BMP will be sampled and sheetflow from that location would not be collected.) This comparison will allow a direct study of the effectiveness of the BMPs at the test sites.

A similar program will be instituted with respect to the other nine candidate critical source types, with the intent to finish all sampling by the end of the sixth rainy season after the effective date of this Order.

In addition, the Principal Permittee will reevaluate, after the third rainy season, the progress made by other entities in California to evaluate the critical sources determined by the Principal Permittee to be significant pursuant to the process described in Section V(A) above. If, following that determination, the County determines that there are additional significant critical sources which require monitoring (because they have not been monitored and there are no commitments by other municipal stormwater programs to conduct such monitoring) or if it determines that monitoring of a significant critical source did not include evaluation of BMPs associated with such monitoring, it will commit to monitor up to three additional critical sources commencing in the fourth rainy season and concluding by the end of the eighth complete rainy season following the effective date of the permit. If the Principal Permittee's review determines that a significant critical source had been monitored, but that there was not (and is not planned to be) an evaluation of associated BMPs, the Principal Permittee will undertake a BMP evaluation only for that critical source and will not conduct the first year characterization study.

#### 6. Receiving Waters

The Principal Permittee will fund the largest part of a receiving waters study that will be a joint effort of the University of Southern California, the University of California at Santa Barbara and the Southern California Coastal Water Research Project ("SCCWRP"). In addition, the study will be done in cooperation with an ongoing toxicity study by investigators at UCLA. Co-funding, either direct or in terms of vessel support, also will be provided by the federal government through the Sea Grant program, by the City of Los Angeles and through SCCWRP. The scope of that study may be affected by the availability of non-County funding sources, as is discussed below.

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### Study Outline

The receiving waters study includes a plume study to determine the dispersion of stormwater runoff and associated sediment, a study of the benthic environment near two principal storm drains, Malibu and Ballona Creeks and an assessment of the toxicity of storm drain waters and affected sediments near Malibu and Ballona Creeks. The plume study will be carried out by the USC Sea Grant program, and the benthic and toxicity studies will be carried out by SCCWRP.

The plume study will be carried out over two storm seasons, with the third year used for analysis of the data obtained in the previous years. The Principal Permittee will spend up to a maximum of \$145,000 to support the plume study. Additional funds will be supplied by the federal Sea Grant program, with research vessel time to be provided by the City of Los Angeles. The benthic study will also be carried out over at least two storm seasons. The Principal Permittee will spend up to a maximum of \$205,000 for the benthic study, plus up to an additional \$80,000 for a third year of study, if it is the consensus of the project scientists that a third year of research is appropriate. Finally the County will commit up to a maximum of \$118,500 for a study of the toxicity of storm water and affected sediments, with an additional up to \$80,500 for a third year of the study if it is the consensus of the project scientists that a third year of research is appropriate. Each element of these studies is outlined below.

### Plume Investigation

The plume study will examine the following issues, among others: i. Mapping the spatial and temporal structure of the runoff plumes from Ballona and Malibu Creeks as they flow into Santa Monica Bay following strong winter storms; ii. Examining the interaction between the runoff plume and ocean processes as they affect the advection, dispersion, and mixing of the plume; iii. Evaluating the impact of storm runoff plumes on beneficial uses of the coastal ocean; iv. Characterizing the optical properties of the suspended particulate material ("SPM") and dissolved organic material ("DOM") associated with runoff sources; v. Examining the effects of DOM and SPM on the water column optics and the distribution of nutrient concentrations, as the same may affect phytoplankton productivity; and, vi. Helping to establish appropriate locations for benthic study stations.

### Benthic Investigation

The benthic study will measure the following parameters: i. Water quality (dissolved oxygen, salinity, density, temperature, light transmissivity and pH); ii. Sediment grain size, sediment organic concentrations and sediment contaminant concentrations; and iii. Structure of the benthic invertebrate community. The benthic study will employ the same methods used in studies of dry weather impacts in river discharge areas carried

out by SCCWRP in 1994 and 1995 in the Southern California Bight.

### Toxicity Study

The toxicity study will involve the following proposed annual elements:

**Water Column Toxicity:** i. 30 sea urchin fertilization tests taken during two storm and one dry weather event off each of Ballona and Malibu Creeks (including reference sites); ii. 3 Phase I TIE tests on up to 3 samples showing toxicity in the sea urchin fertilization tests;

**Sediment Toxicity:** i. Amphipod survival tests of sediment samples from 10 stations (including reference sites) will be taken 2 times (1 storm and 1 dry weather period) in Year 1; ii. Amphipod survival tests of sediment samples from 10 stations (including reference sites) will be taken 2 times (1 storm and 1 dry weather period) in Year 2; iii. Sea urchin growth tests will be conducted for chronic toxicity in sediment samples from 6 stations, plus 1 reference site, with the locations to be determined by project scientists based on existing data and best scientific judgment. Biological effects only (survival, growth, sediment avoidance) will be measured for all sites in Year 2; iv. Chemical analysis of sea urchin growth test tissue samples (gonad) will be conducted for organics and metals. Duplicate samples from 4 stations (including one reference) will be analyzed in Year 2; v. Phase I TIE tests using sea urchin fertilization of interstitial water from up to 4 stations identified to be toxic in amphipod survival tests (4 samples total) will be conducted in Year 2; and vi. Additional interstitial water testing coordinated with the UCLA.

### Project Flexibility

The exact parameters of Year 2 (and Year 3, if necessary) testing will be determined by a review of the project scientists of the results of Year 1 and Year 2 testing. Thus, certain of the steps outlined above may be modified following the reviews.

### Coordination with UCLA Toxicity Investigation

Researchers from UCLA are involved in an ongoing Santa Monica Bay Restoration Project study of the toxicity of storm water runoff in Ballona and Malibu Creeks. The Principal Permittee's receiving waters study will be coordinated, to the extent possible, with the UCLA study to maximize the utility of the information obtained by both studies.

### Los Angeles and San Gabriel River

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The Principal Permittee will take a total of three (two storm weather and one dry weather) water samples taken at each of the Los Angeles and San Gabriel River mass emission stations during each of the two years that those stations will be monitored. The samples will be analyzed using the sea urchin fertilization tests.

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## VIII. PROGRAM EVALUATION AND REPORTING

[Program Evaluation and Reporting has been completely rewritten to include all reporting requirements. In response to comments, semi-annual reports have been eliminated]

The Principal permittee in consultation with the EAC shall develop a program to standardize evaluation and reporting by each Permittee by October 15, 1996. The Principal Permittee in consultation with the EAC shall develop performance indicators, criteria, or standards; perform evaluation of compliance and effectiveness based on the performance criteria; establish schedules and mechanism for internal record keeping and reporting; and submit Annual Reports to the Regional Board using a standardized format. Each Permittee is encouraged to work cooperatively with MS4 programs from other areas of the state or country in order to be more effective, efficient, and consistent.

Each Permittee shall collect data needed for program evaluation, conduct self-evaluations, and report the results of the evaluations through the Principal Permittee to the Regional Board in Annual Reports. The results reported to the Regional Board shall include both the collected data and analysis of the data. Annual Reports shall include explanations on how the evaluations were conducted; how and why provisions of the permits are/are not being met, how the effectiveness of BMPs is determined or is not, and should a problem arise, how it will be corrected.

### A. DEMONSTRATION OF COMPLIANCE

1. Each Permittee is responsible for demonstrating that the required BMPs and other actions as prescribed under this permit, as well as BMPs and actions included in the CSWMP and WMAPs, are implemented to reduce pollutants to the maximum extent practicable.
2. The Permittees within the WMCs are responsible for demonstrating the effectiveness of watershed specific BMPs by conducting and reporting the results of pilot/demonstration projects for evaluating the effectiveness of BMPs in the watershed.
3. The degree and the effectiveness of BMP implementation shall be evaluated and reported by each Permittee using environmental and/or administrative indicators whenever possible. When environmental indicators are not readily and/or easily available, administrative indicators shall be used. These shall include indicators prescribed under relevant provisions of this permit, and/or other indicators deemed appropriate by the WMCs, the EAC, and/or ultimately the Regional Board. (Examples of quantitative indicators include the number of

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inspections conducted, number of staff, number of audience reached through public education, waste recycled, water conserved, hazardous waste collected, oil recycled, and catch basin waste removed.) Quantitative indicators of environmental conditions shall also be reported if they can be linked to the effectiveness of BMP implementation.

4. In order to yield comparable results for year to year evaluation on the success, the progress, and/or the failure in BMP implementation, and comparable results from area to area, a uniform data collection methodology shall be established for each of the required BMPs. The uniform data collection methodology shall be developed by the Principal Permittee in consultation with EAC. Subsequently, each report on BMP implementation shall provide comparison with the implementation status during the previous reporting period and the scheduled implementation timeline for the current and future reporting periods, based on data collected using the uniform collection methodology.

#### B. INTERNAL REPORTING AND RECORD KEEPING

1. In order to facilitate the preparation of the Annual Report, the Principal Permittee in consultation with the EAC shall develop standard forms for internal reporting to be used by all Permittees within the watershed. The forms shall be used to collect all the information essential to the preparation of the annual reports and to the needs of other management actions by the WAC, WMCs and/or the Permittees. Reported information shall be quantifiable and specific for each program area and/or BMP. The dates for submitting the internal reports shall allow sufficient time for compilation and analysis by the WMCs and/or the Principal Permittee/EAC for the preparation of the Annual Report due to the Regional Board.
2. All records shall be retained by each Permittee for a period of 5 years unless directed otherwise by the Regional Board or the USEPA.

#### C. PROGRAM REPORTING

The Principal Permittee shall collect, compile, and analyze information from each Permittee within the watershed prior to preparation of the Annual Report. The Annual Report shall include a summary table illustrating the levels of implementation for each Permittees by watershed. Tables shall be developed for each program element listing all the participating Permittees and describe the status of implementation for each Permittee.

The Principal Permittee shall include in the Annual Report submitted to the Regional Board:

1. **Program Management**
  - a. **Compiled budget summary of resources dedicated for storm water program implementation submitted by Permittees;**
  - b. **A statement under penalty of perjury by each Permittee's representative legal counsel that the Permittee has obtained all necessary legal authority to comply with this Order; and/or a schedule for obtaining adequate legal authority (1996 Annual Report only); and**
  - c. **Progress on obtaining any residual legal authority, if full legal authority was not certified in Provision VIII. C. 1.b., above.**
2. **Illicit Connections/Discharges**
  - a. **Summary of illicit connections eliminated. The summary shall include by category:**
    - i. **Type of illicit connection;**
    - ii. **Type of contaminants or chemical waste;**
    - iii. **watershed;**
    - iv. **Ranges of estimated length of time the practice was on-going;**
    - v. **remedial action taken;**
    - vi. **Number eliminated and number in process of elimination;**
    - vii. **Number subject to legal enforcement actions;**
    - viii. **Comments as appropriate.**
  - b. **Summary of illicit discharge practices reported through the standardized public reporting system. The summary shall include by category:**
    - i. **Type of illicit discharge/disposal practice;**
    - ii. **Type of contaminant waste spilled/disposed;**
    - iii. **watershed;**
    - iv. **Range of estimated quantity of waste;**
    - v. **Range of estimated length of time the practice was on-going;**
    - vi. **Remedial action taken;**
    - vii. **Number eliminated;**
    - viii. **Number subject to legal enforcement actions;**
    - ix. **Comments as appropriate.**
3. **Industrial/Commercial Activity**

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- a. **Summary of progress of the industrial/commercial activity program**
- b. **Database compiled in Provision III.A.3. when requested by the Regional Board. A Permittee may also be requested to provide the industrial/commercial database information for its municipality in Provision III.A. in an appropriate format.**

**4. Construction Activity**

- a. **Summary of progress of the development planning/construction program;**
- b.. **Construction activity database developed in Provision IVB.1. in an appropriate format when so requested by the Regional Board.**

**5. Public Agency Activity**

- a. **Summary of progress on the Public Agency Program in the areas of: (i) Sewage Systems Operation (if appropriate); (ii) Public Construction; (iii) Vehicles Maintenance/ Material Storage; (iv) Parks and Recreation/ Facilities Management; (v) Storm Drain Operation and Management; (vi) Streets and Roads Maintenance; (vii) Flood Control Maintenance; (viii) Parking Facilities Management; and (ix) Public Industrial Activities (optional).**

**6. Public Education / Public Participation**

- a. **Summary of the Public education / Public participation program. The summary shall include:**
  - i. **Activities undertaken throughout the year;**
  - ii. **Samples of educational materials distributed or otherwise made public throughout the year;**
  - iii. **Results of the comparison between performance standards and the Permittees' Public Information and Participation programs; and,**
  - iv. **A workplan for any changes to the 5 year strategy.**
- b. **Results of a public education survey undertaken within a representative area of the County of Los Angeles during fiscal year 1997-1998 (1999 Annual Report only).**

**D. PROGRAM EVALUATION**

The Principal Permittee in consultation with the EAC shall, in the Annual Report submitted to the Regional Board, evaluate progress in the storm water program,

propose any proposed modifications to be made to the storm water program (e.g., delays, changes), and analyze any problems encountered during the implementation and propose solutions. The Program Evaluation shall include proposed changes to storm water program components for the following year, based on the analysis.

The Program Evaluation shall utilize the information provided by each Permittee, and assess program effectiveness in the areas of:

1. **Program Management**
2. **Illicit Connections/Discharge**
3. **Industrial/Commercial Activity**  
by review of:
  - a. **Industrial/commercial sources listing;**
  - b. **On-site inspections;**
  - c. **Checklists of storm water BMPs implemented; and,**
  - d. **Results from the critical sources monitoring program in**
4. **Construction Activity**  
by review of:
  - a. **BMPs implemented based on site inspection results; and**
  - b. **Results from the critical source monitoring program.**
5. **Public Agency Activity**  
by review of:
  - a. **Sewage Systems Operation (if appropriate);**
  - b. **Public Construction;**
  - c. **Vehicles Maintenance/ Material Storage;**
  - d. **Parks and Recreation/ Facilities Management;**
  - e. **Storm Drain Operation and Management;**
  - f. **Streets and Roads Maintenance;**
  - g. **Flood Control Maintenance;**
  - h. **Parking Facilities Management; and**
6. **Public Education / Public Participation**  
by review of:
  - a. **Storm water/non-storm water pollution prevention public education programs within the County of Los Angeles and recommendations on future public education efforts.**

**E. PERFORMANCE STANDARDS**

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1. The CSWMP and subsequent WMAPs shall be revised to adopt and incorporate Performance Standards developed by the Principal Permittee in consultation with the EAC. Performance Standards are defined as the level of implementation necessary to demonstrate the control of pollutants in storm water to the "maximum extent practicable". Performance Standards shall be established for implementing BMPs contained in this Order and the CSWMP and the WMAPs. Performance Standards shall be developed through a process which includes opportunities for public participation and include appropriate criteria for the applicability, economic feasibility, design, operation, and maintenance or otherwise implementation of BMPs so as to achieve pollutant reduction or pollution prevention benefits to the "maximum extent practicable". Performance Standards may be based upon special studies or other activities conducted by the a Permittee, literature review, or special studies conducted by other programs.
2. Performance Standards shall include countywide components to be accomplished and the method to be used to verify that the Performance Standard has been achieved. Following the addition of a Performance Standard to the CSWMP or WMAP acceptable to the Executive Officer, each Permittee for which the Performance Standard is applicable shall adhere to its implementation. Performance Standards shall be established for all appropriate BMPs identified in the CSWMP by July 15, 1997, or otherwise, a proposed schedule for completing or omitting the establishment of Performance Standards with justification acceptable to the Executive Officer must be submitted by January 15, 1998. Such time schedules shall not extend beyond the term of this permit.
3. Each Permittee shall incorporate newly developed or updated Performance Standards, approved by the Executive Officer, in each revision to the CSWMP or the WMAP.

**E. ANNUAL REPORTS**

1. **Annual Report**  
The Annual Report shall include both a summary of the progress and status of CSWMP and WMAP implementation, a summary on status of compliance with all Permit provisions, a report on the evaluation of program effectiveness, and a summary of recommendations for permit provision modifications.
  - a. The Principal Permittee in coordination with the EAC shall submit an Annual Report to the Regional Board no later than March 31 of each year. The first Annual Report shall be due

**April 15, 1997:**

- b. The Principal Permittee shall submit a separate Monitoring Annual Report due no later than August 15 of each year. The first Monitoring Annual Report shall be due August 15, 1996; and
- c. The Principal Permittee in consultation with the EAC shall identify in the Annual Report, Performance Standards which will be developed for the upcoming fiscal year.

The Principal Permittee in consultation with the EAC may recommend and request revisions to the CSWMP and the WMAPs through documentation in the Annual Reports.

Recommended revisions to the CSWMP and WMAPs will be considered by the Executive Officer if it is demonstrated that: (i) the changes will lead to improvement of the effectiveness of this program; (ii) the changes will result in positive impacts to beneficial uses; and (iii) the current measures have been implemented to reduce pollutants to the "maximum extent practicable". Any recommended revisions shall not take effect until approved by the Executive Officer.

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**IX. ADDITIONAL PROVISIONS**

[This is the End section of a permit, and was not in the September 15, 1995 partial draft]

1. The initial storm water management program, as delineated in the CSWMP or WMAPs may need to be modified, revised, or amended from time-to-time to respond to changed conditions and to incorporate more effective approaches to pollutant controls. Minor changes may be made at the direction of the Executive Officer. Minor changes requested by the Discharger shall become effective upon written approval of the Executive Officer. If proposed changes imply a major revision in the overall scope of effort of the program, such changes must be approved by the Regional Board as permit amendments.
  
2. This Order may be modified, revoked, or reissued, prior to the expiration date as follows:
  - a. To address changed conditions identified in the required technical reports or other sources deemed significant by the Regional Board;
  
  - b. To incorporate applicable requirements or statewide water quality control plans adopted by the State Board or amendments to the Basin Plan;
  
  - c. To comply with any applicable requirements, guidelines, or regulations issued or approved under Section 402(p) of the Clean Water Act, if the requirement, guideline, or regulation so issued or approved contains different conditions or additional requirements not provided for in this Order. The Order as modified or reissued under this paragraph shall also contain any other requirements of the CWA then applicable; or
  
  - d. Any other Federal or State Laws or Regulations become effective which necessitate changes.
  
3. The issuance of this permit is not intended to, and does not, absolve any Permittee of liability for conduct which may have constituted a violation of the previous Board Order 90-079 (CA0061654, CI 6948) adopted by this Regional Board on June 18, 1990.
  
4. All reports or submittals made to the Regional Board shall include the following signed certification;

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who

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manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

- a. The certification shall only be valid if made by either: a principal executive officer; or a ranking elected official.
- b. A certification may be accepted by this Regional Board if signed by a duly authorized representative only if:
  - i. The authorization is made in writing by a person described in 4.a above;
  - ii. The authorization specifies either an individual or a position having responsibility for the overall operation of the Permittee's storm water management program, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the Permittee, (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) and,
  - iii. The written authorization is submitted to the Executive Officer of the Regional Board.

5. This Order expires on (five years from the date of reissuance.) The Principal Permittee and Permittees must submit complete Reports of Waste Discharge (ROWD) in accordance with Title 23, California Code of Regulations, not later than 180 days in advance of such date as application for reissuance of waste discharge requirements. The ROWD shall consist of watershed specific WMAPs.

I, Robert P. Ghirelli, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on (date of reissuance).

ROBERT P. GHIRELLI, D.Env.  
Executive Officer



**ATTACHMENT A**  
**NPDES STORM WATER PERMIT**  
**WATERSHED MANAGEMENT AREAS**

**Santa Monica Bay**

**Malibu Creek and Other Rural**

Agoura Hills  
 \*Calabasas  
**Los Angeles County**  
 Malibu  
 Westlake Village

**Ballona Creek and Other Urban**

Beverly Hills  
 Culver City  
 El Segundo  
 Hermosa Beach  
**Los Angeles**  
**Los Angeles County**  
 Manhattan Beach  
 Palos Verdes Estates  
 Rancho Palos Verdes  
 Redondo Beach  
 Rolling Hills  
 Rolling Hills Estates  
 \*Santa Monica  
 West Hollywood

**Dominquez Channel/  
 Los Angeles Harbor Drainage**

Carson  
 Gardena  
 Hawthorne  
 Inglewood  
 Lawndale  
 Lomita  
**Los Angeles**  
**Los Angeles County**  
 \*Torrance

**Los Angeles River**

Alhambra  
 Arcadia  
 Bell  
 Bell Gardens  
 Burbank  
 Commerce  
 Compton  
 Cudahy  
 El Monte  
 Glendale  
 Hidden Hills  
 Huntington Park  
 La Canada Flintridge  
 \*Long Beach  
**Los Angeles**  
**Los Angeles County**  
 Lynwood  
 Maywood  
 Monrovia  
 Montebello  
 Monterey Park  
 Paramount  
 Pasadena  
 Rosemead  
 San Fernando  
 San Gabriel  
 San Marino  
 Sierra Madre  
 Signal Hill  
 South El Monte  
 South Gate  
 South Pasadena  
 Temple City  
 Vernon

**San Gabriel River**

Artesia  
 Azusa  
 Baldwin Park  
 Bellflower  
 Bradbury  
 Cerritos  
 Claremont  
 Covina  
 Diamond Bar  
 Downey  
 Duarte  
 Glendora  
 Hawaiian Gardens  
 Industry  
 Irwindale  
 La Habra Heights  
 La Mirada  
 La Puente  
 La Verne  
 Lakewood  
 \*Long Beach  
**Los Angeles County**  
 Norwalk  
 Pomona  
 Pico Rivera  
 San Dimas  
 Santa Fe Springs  
 Walnut  
 West Covina  
 Whittier  
  
**Santa Clara River**  
**Los Angeles County**  
 Santa Clarita

*Italicized agencies are present in more than one watershed. \* Indicates City with the largest watershed population other than the County of Los Angeles and the City of Los Angeles*

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## ATTACHMENT B

### LAND USE SITE SELECTION PROCESS <sup>OUT</sup> <sub>LINE</sub>

The data compiled during the site selection activities set forth below will enable the County to select the most effective monitoring sites. In addition, this information can be used by the County to extrapolate the monitoring results across the whole drainage area through use of loads assessment modelling.

#### Step 1

The County will take the Southern California Association of Governments ("SCAG") categories listed below as an initial list of land use categories. The County will use its best efforts to obtain overlays (or similar information) for use in the land use selection process. However, these overlays or information must be usable County-wide in the SCAG database and the County shall not be required to look for or use overlays or information which cannot be so used. The County also shall not be required to create overlays. Some of these categories may not be important (very small area represented in study area, and/or known very low EMC or runoff mass). The initial number of categories will be reduced at this step.

For each remaining category, the County will identify eight (8) representative locations. The eight (8) locations in each category would be relatively small areas, such as a square block for residential areas, a single school or church, a few blocks of strip commercial, etc. These sites would be selected, where possible, over a wide geographical area of the study area to include a range of topographical characteristics such as distance from ocean, etc.

#### Step 2

In this step, the County should perform a site survey of ground conditions. For each of the eight (8) locations identified for each category, the County should collect information, to the extent such information is available, including: type of roof connections, type of drainage, age of development, housing density, type of landscaping, condition of pavement, soils, and existing stormwater control practices.

These are simple field surveys that can be completed by a team of two people at the rate of about 5-6 (maximum) locations a day, depending on navigation problems, traffic delays, and the proximity of the sites. Several photographs should be made of each site and archived with the field sheets for future reference.

#### Step 3

In this step, currently available aerial photographs taken in the past five years are used to measure the percent impervious area associated with rooftops, streets, driveways, sidewalks, parking areas, storage areas, decks and sheds, swimming pools, alleyways, and other paved areas. Photographic prints for each of the homogeneous neighborhoods examined on the ground in step 2 are needed. The actual measurements require about an hour per site.

#### Step 4

In this step, the County would compile the information collected in the previous steps and use it to determine which land use categories should be monitored. This refinement step would result in a final list of categories to be examined, based on the actual measured values.

Some of the sites selected for field measurement may actually belong in another category and would be reassigned to that category before the data were evaluated. In addition, development characteristics and areas of important elements may indicate greater variability within an initial category than between other categories in the same land use. If there is no other reason to suspect differences that would affect drainage quality or quantity, these areas could be combined to reduce the total number of

Individual land use categories used in subsequent evaluations.

On the basis of Step 2, Step 3, the County will measure the percent of directly connected impervious area for each of the eight neighborhoods surveyed. The County will then compare the percent of impervious area using simple non-parametric statistics to see how differences within a single land use category compare with differences between land use categories. Based on this analysis, the County will aggregate or subdivide land use categories as appropriate. Subdivisions of land use categories shall correspond to those in the SCAG database.

**Step 5**

Next, the County will rank the selected land use categories according to their predominance and pollutant generation. As part of its analysis, the County would perform a marginal cost/benefit analysis as to which land use categories should be monitored.

For each land use category the following will be estimated based on existing data: drainage area, runoff quantity and an EMC value for each of four indicator pollutants (preliminarily, copper, pyrene, total suspended solids and diazinon). The product of runoff quantity and EMC is the estimated total annual pollutant loading associated with each land use category and indicator pollutant. These sums are then ranked, from the largest to the lowest, and an accumulated percentage contribution is then produced for each pollutant. These accumulated percentage values are plotted against the number of land use categories. The graph will be relatively steep initially and then level off as it approaches 100%. A marginal cost-benefit analysis can then be used to select the number of land uses that should be monitored, which will take into account all four of the indicator pollutants.

The list of County-wide land use categories to be evaluated in Step 5 will be reviewed for each of the six watersheds in the Permit area. If there is a monitorable land use category in an individual watershed which is in the top five land uses in terms of total area in the watershed and which is known or reasonably believed to have a significant impact on stormwater runoff quality, but which would not be monitored based on the County-wide marginal cost-benefit analysis, up to two such land uses shall be monitored after the first year of the monitoring program, subject to the station event cap.

Attached as Exhibit 1 is a document setting forth how the cost benefit analysis would work. [document to be reviewed and approved for attachment as Exhibit]

**Step 6**

The County will take the top ranked land uses and if the total number of categories exceed ten, select ten monitoring sites for monitoring the first year. All of the remaining top-ranked land uses will need to be monitored in future years, subject to the station event cap. In selecting those sites for initial monitoring, the County should look for homogeneous areas that are self-contained in a drainage area. In addition, monitoring locations will need to be selected along storm drains that are able to accommodate the sampling equipment, have sampling access, no safety problems, etc.

**Step 7**

Next, the monitoring stations are installed. The monitoring equipment will include automatic water samplers and, if surcharging flow problems are anticipated, flow sensors measuring velocity and depth of flow. The samples collected at the automatic samplers should all be flow-weighted composites, requiring only one sample to be analyzed per event at each monitoring station. Each sampler site will need to be visited periodically to ensure that everything is ready to sample.

**Step 8**

The County should continue down the list of priority land use categories and install additional monitoring stations in subsequent years. At some point, the marginal benefit from monitoring an additional land use category will not be sufficient to justify the cost, as determined from the marginal cost-benefit

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analysis in step 5, and no additional sites need to be installed. The land use sampling program will end when sufficient storms have been sampled to obtain the desired error level in the values for the constituents of concern.

**SCAG LAND USE CLASSIFICATIONS**

- Single Family Residential
- High Density
- Low Density
- Multi-Family Residential
- Mobile Homes and Trailer Parks
- Mixed Residential
- Rural Residential
- General Office Use
- Retail Stores and Commercial Services
- Other Commercial
- Public Facilities
- Special Use Facilities
- Educational Institutions
- Military Installations
- Light Industrial
- Heavy Industrial
- (Mineral) Extraction
- Wholesaling and Warehousing
- Transportation
- Communication Facilities
- Utility Facilities
- Maintenance Yards
- Mixed Transportation
- Mixed Transportation and Utility
- Mixed Commercial and Industrial
- Mixed Urban
- Under Construction
- Golf Courses
- Local Parks and Recreation
- Regional Parks and Recreation
- Cemeteries
- Wildlife Preserves and Sanctuaries
- Specimen Gardens and Arboreta
- Beach Parks
- Other Open Space and Recreation
- Urban Vacant
- Irrigated Cropland and Improved Pasture Land
- Non-Irrigated Cropland and Improved Pasture Land
- Orchards and Vineyards
- Nurseries
- Dairy and Intensive Livestock, and Associated Facilities
- Poultry Operations
- Horse Ranches
- Abandoned Orchards and Vineyards
- Other Agriculture
- Vacant Undifferentiated
- Vacant with Limited Improvements

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**ATTACHMENT C**  
**GLOSSARY OF TERMS**

**40 CFR:** Title 40 of the Code of Federal Regulations, which is the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the federal government.

**Annual Report:** A report, submitted to the Regional Board at the end of each permit year, that includes a summary of the progress and status of stormwater management program implementation, a summary on status of compliance with all permit provisions, and report on program effectiveness, and a summary of recommendations for revisions to the NPDES stormwater permit. [Consistency issue: this definition is consistent with the language in the draft permit. Below is a definition based on 40 CFR §122.42(c). It is recommended that the permit based definition be used unless the permit language is modified to read like 40 CFR §122.42(c).]

[**Annual Report:** A report, submitted yearly to the Regional Board by the anniversary of the date of the issuance of the NPDES storm water permit, that includes: (1) the status of implementing the components of the storm water management program that are established as permit conditions; (2) proposed changes to the storm water management programs that are established as permit conditions; (3) revisions, if necessary, to the assessment of controls and the fiscal analysis reported in the permit application; (4) a summary of data, including monitoring data, that is accumulated throughout the reporting year; (5) annual expenditures and budget for year following each annual report; (6) a summary describing the number and nature of enforcement actions, inspections, and public education programs; and (7) identification of water quality improvements or degradation.][Consistency issue: see discussion above.]

**Authorized Discharge:** Any discharge that is authorized pursuant to an NPDES permit or meets the exemptions set forth under II.C.1. and II.C.2. of this NPDES storm water permit.

**Basin Plan:** The Water Quality Control Plan, Los Angeles Region(4), Santa Clara River and Los Angeles River Basins, adopted by the Regional Board on June 13, 1994 or as subsequently amended.

**Beneficial Uses:** Existing or potential uses of receiving waters in the permit area as designated by the Regional Board in the Basin Plan. *Examples of beneficial uses may include municipal and domestic supply; agricultural supply; industrial process supply; industrial service supply; ground water recharge; freshwater replenishment; navigation; hydropower generation; water contact recreation; non-contact water recreation; commercial and sport fishing; aquaculture; warm freshwater habitat; cold freshwater habitat; inland saline water habitat; estuarine habitat; wetland habitat; marine habitat; wildlife habitat; preservation of biological habitats; rare, threatened, or endangered species; migration of aquatic organisms; spawning, reproduction, and/or early development; and shellfish harvesting.*

**BAT/BCT Criteria:** Treatment-based standards for reducing the discharge of pollutants, as defined in 40 CFR subchapter N, for specific categories of industrial facilities subject to storm water effluent limitations guidelines, new source performance standards, or toxic pollutant effluent standards. Effluent limitations have been defined in 40 CFR for the reduction of toxic pollutants using Best Available Technology Economically Achievable (BAT), and for the reduction of conventional pollutants using Best Conventional Pollutant Control Technology (BCT).

**Best Management Practice (BMP):** Activities, practices, facilities, and procedures that when implemented prevent or reduce the pollution of waters of the state. *Examples of BMPs include treatment facilities, operating procedures, and practices to control site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.*

**Bioaccumulate:** The build up of a substance in the tissues of an organism to a higher concentration than in the surrounding environment, generally as a result of the organism's ingestion and internal

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storage of the substance over time.

**Biostimulatory:** An agent, action, or condition that arouses, elicits or accelerates physiological or organic activity. *For example, the introduction of excessive nutrients to an aquatic ecosystem has a biostimulatory effect which manifests itself as excessive growth of aquatic life.*

**California Storm Water Best Management Practice Handbooks:** The technical manuals prepared under direction of the Storm Water Quality Task Force, representing California members of the American Public Works Association (APWA). *Comprising three volumes—Municipal, Industrial, and Construction—they provide guidance for selecting BMPs to reduce pollutants in storm water discharges. These manuals are available from Blue Print Service, 1700 Jefferson Street, Oakland, CA 94612, (510) 444-5771 or Fax (510) 444-1262.*

**Clean Water Act (CWA):** The Federal Water Pollution Control Act enacted in 1972 by Public Law 92-500 and amended by the Water Quality Act of 1987. *The Clean Water Act prohibits the discharge of pollutants to Waters of the United States unless said discharge is in accordance with an NPDES permit. The 1987 amendments include guidelines for regulating municipal, industrial, and construction storm water discharges under the NPDES program.*

**Construction Activity:** Clearing, grading, or excavation that results in soil disturbance. Construction activity does not include routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of the facility, nor does it include emergency construction activities required to protect public health and safety.

**Countywide Storm Water Management Plan:** A comprehensive plan for implementation of the permit requirements described in Sections C.I through C. VIII of the NPDES storm water permit that are applicable to all Permittees and all Watershed Management Areas. *The Countywide Storm Water Management Plan will be developed as a single document by the Principal Permittee, with assistance from the EAC and participation from the Permittees, according to the schedule prescribed in the permit. This shall be used as a tool to develop a watershed specific storm water management plan.*

**Development:** The placement or erection of any solid material or structure on land, in or under water; grading, removing, dredging, mining or extraction of any materials; change in the density or intensity of use of land including, but not limited to, subdivisions pursuant to the Subdivision Map Act Government Code §66410 et seq.), any other division of land, including lot splits; construction, reconstruction, demolition or alteration of the size of any structure. Development does not include any of the described activities not regulated by the local municipality. [Consistency issue: Is the last sentence necessary since this is implied in all sections of the permit?]

**Discharge:** Any release, spill, leak, pump, flow, escape, dumping, or disposal of any liquid, semi-solid or solid substance.

**Effectiveness:** A measure or indicator of how well a program, plan, or best management practice achieves its intended purpose. *Measures or indicators of effectiveness include, but are not limited to, detailed accounting of program accomplishments, funds expended, staff hours utilized, and results of quantitative monitoring.*

**Erosion:** The wearing away of land surface primarily by wind or water. *Erosion occurs naturally as a result of weather or runoff but can be intensified by clearing, grading, or excavation of the land surface.*

**Executive Advisory Committee (EAC):** A committee composed of representatives of the County of Los Angeles (chair), the City of Los Angeles, and the six Watershed Management Areas. *Duties include assisting in development of the Countywide Storm Water Management Plan; reviewing Watershed Management Plans and providing direction and guidance to the Watershed Management Committees; preparing and forwarding unified submittals to the Regional Board; mediating conflict among permittees; coordinating the implementation of pilot programs, and evaluating BMP appropriateness and assessing effectiveness.*

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**Executive Officer:** The Executive Officer of the California Regional Water Quality Control Board, Los Angeles Region, or an authorized representative.

**Good Housekeeping Practice:** A common practice related to the storage, use, or cleanup of materials, performed in a manner that minimizes the discharge of pollutants. *Examples include purchasing only the quantity of materials to be used at a given time, use of alternative and less harmful products, cleaning up spills and leaks, and storing materials in a manner that will contain any leaks or spills.*

**Hazardous Material:** Any material defined as hazardous by Chapter 6.95 of the California Health and Safety Code. *This includes any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.*

**Hazardous Substance:** Any substance determined to be a hazardous substance pursuant to Section 311(b)(2) of the Federal Water Pollution Control Act (33 U.S.C. Sec. 1251 et seq.). Hazardous substance does not include any of the following: (1) nontoxic, nonflammable, noncorrosive stormwater runoff drained from underground vaults, chambers, or manholes into gutters or storm sewers; (2) any pesticide which is applied for agricultural purposes or is applied in accordance with a cooperative agreement authorized by Section 2426 of the Health and Safety Code, and is not discharged accidentally or for purposes of disposal, the application of which is in compliance with all applicable state and federal laws and regulations; (3) any discharge to surface water of a quantity less than a reportable quantity as determined by regulations issued pursuant to Section 311(b)(4) of the Federal Water Pollution Control Act.

*Examples of hazardous substances include any substance or chemical product for which one or more of the following applies:*

- A material safety data sheet (MSDS) is required
- The substance is listed as radioactive by the Nuclear Regulatory Commission
- The substance is listed as hazardous by the U.S. Department of Transportation
- The material is listed in Labor Code §6382(b).

**Illicit Connection:** Any man-made conveyance that is connected to the storm drain system without a permit. *Examples include channels, pipelines, conduits, inlets, or outlets that are connected directly to the storm drain system.*

**Illicit Discharge:** Any discharge to the storm drain system that is prohibited under local, state or federal statutes, ordinances, codes or regulations. *This includes all non-storm water discharges except discharges pursuant to an NPDES permit and discharges that are exempted or conditionally exempted in accordance with Sections II.C.1 and II.C.2 of the NPDES storm water permit.*

**Impact:** Any actual or potential impelling or compelling negative effect caused either directly or indirectly by the discharge of pollutants to the municipal storm drain system.

**Impervious Surface:** Man-made or modified surface that prevents or significantly reduces the entry of water into the underlying soil, resulting in runoff from the surface in greater quantities and/or at an increased rate when compared to natural conditions prior to development. *Examples of places that commonly exhibit impervious surfaces include parking lots, driveways, roadways, storage areas, and rooftops. The imperviousness of these areas commonly results from paving, compacted gravel, compacted earth, and oiled earth.*

**Industrial/Commercial Facility:** Any facility involved and/or used in the production, manufacture, storage, transportation, distribution, exchange or sale of goods and/or commodities, and any facility involved and/or used in providing professional and non-professional services. This category of facility includes, but is not limited to, any facility defined by the Standard Industrial Classifications (SIC). Facility ownership (federal, state, municipal, private) and profit motive of the facility are not factors in

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this definition.

**Integrated Pest Management (IPM):** A philosophy of pest management that considers a whole ecosystem when determining the pest control strategies. This philosophy emphasizes use of a hierarchy of controls, with a preference for mechanical controls (e.g., mowing) and biological controls (e.g., beneficial insects, pheromones) before chemical controls (e.g., pesticides).

**Legal Authority:** The ability of a Permittee to impose and enforce statutes, ordinances, and regulations to require control of pollutant sources and regulate the discharge of pollutants to the storm drain system, and to enter into interagency agreements, contracts, and memorandums of understanding. These powers are granted to the Permittees by the Constitution of the State of California and the General Laws of the State (for General Law Cities/Counties) or individual constitutions (for Charter Cities/Counties). These powers are promulgated by the Permittee through their municipal codes, ordinances, and statutes duly adopted by their governing body.

**Maximum Extent Practicable (MEP):** A performance-based standard for the reduction of pollutants through the development and implementation of a program of Best Management Practices under the County-Wide Storm Water Management Plans and Watershed Management Plans. This means selecting all practicable BMPs taking into account factors including: pollutant removal effectiveness, regulatory compliance, public acceptance, implementability, cost and technical feasibility. BMPs identified through this process do not have to be implemented if it is found that: (1) other effective BMPs will achieve greater or substantially the same pollution control benefits; (2) the BMP would not be technically feasible; or (3) the cost of implementation would greatly outweigh the pollution control benefits. The entity(s) responsible for developing and implementing each plan shall have the burden of showing that it has met the "maximum extent practicable" standard in proposing or rejecting BMPs for implementation.

**National Pollutant Discharge Elimination System Storm Water Permit (NPDES storm water permit):** A permit issued pursuant to the Clean Water Act that requires the discharge of pollutants to Waters of the United States from storm water be controlled. NPDES permits can be issued for single point discharges such as wastewater treatment plants, or for municipal storm drain systems which effectively consist of multiple point discharges of water originating as non-point sources.

**Non-storm water Discharge:** Any discharge to a municipal storm drain system that is not composed entirely of storm water.

**Nuisance:** Anything which meets all of the following requirements: (1) is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property; (2) affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal; (3) occurs during, or as a result of, the treatment or disposal of wastes.

**Permittee(s):** Any agency named in the NPDES storm water permit as being responsible for permit conditions within its jurisdiction. Permittees to the NPDES storm water permit include the County of Los Angeles and the cities of Agoura Hills, Alhambra, Arcadia, Artesia, Azusa, Baldwin Park, Bell, Bellflower, Bell Gardens, Beverly Hills, Bradbury, Burbank, Calabasas, Carson, Cerritos, Claremont, Commerce, Compton, Covina, Cudahy, Culver City, Diamond Bar, Downey, Duarte, El Monte, El Segundo, Gardena, Glendale, Glendora, Hawaiian Gardens, Hawthorne, Hermosa Beach, Hidden Hills, Huntington Park, Industry, Inglewood, Irwindale, La Canada Flintridge, La Habra Heights, Lakewood, La Mirada, La Puente, La Verne, Lawndale, Lomita, Long Beach, Los Angeles, Lynwood, Malibu, Manhattan Beach, Maywood, Monrovia, Montebello, Monterey Park, Norwalk, Palos Verdes Estates, Paramount, Pasadena, Pico Rivera, Pomona, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, Rosemead, San Dimas, San Fernando, San Gabriel, San Marino, Santa Clarita, Santa Fe Springs, Santa Monica, Sierra Madre, Signal Hill, South El Monte, South Gate, South Pasadena, Temple City, Torrance, Vernon, Walnut, West Covina, West Hollywood, Westlake Village, and Whittier.

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•Elevated levels of the pollutant are found in sediments of a receiving water and/or have the potential to bioaccumulate in organisms therein, or

•The detectable inputs of the pollutant are at a level high enough to be considered potentially toxic to humans and/or flora and fauna.

*Pollutants of concern may be different for each receiving water.*

*Pollutants of concern for the Santa Monica Bay Watershed Management Area include, DDT, PCBs, PAHs, Chlordane, TBT, cadmium, chromium, copper, lead, nickel, silver, zinc, pathogens, TSS (sediment), nutrients, trash and debris, chlorine, oxygen demanding substances, and oil and grease.*

**Pollution Prevention:**

**Principal Permittee:** The agency named in the NPDES storm water permit to serve as permit coordinator, responsible for general administration of the permit, and coordinating cooperation by other Permittees, including but not limited to the implementation of local self-monitoring programs and BMPs, and preparation and submittal of reports required by the permit. *The Principal Permittee to the NPDES storm water permit is the County of Los Angeles.*

**Public Agency Vehicle Maintenance/Material Storage Facility:** Any Permittee-owned and/or operated facility that is: used for vehicle or equipment maintenance, repair, washing, or fueling; and/or is required to prepare a hazardous materials business plan.

**Regional Board:** The state agency with primary responsibility for the coordination and control of water quality. *This means the California Regional Water Quality Control Board, Los Angeles Region for the area covered by the NPDES storm water permit. The Los Angeles region, which comprises all basins draining into the Pacific Ocean between the southeasterly boundary, located in the westerly part of Ventura County, of the watershed of Rincon Creek and a line which coincides with the southeasterly boundary of Los Angeles County from the ocean to San Antonio Peak and follows thence the divide between San Gabriel River and Lytle Creek drainage to the divide between Sheep Creek and San Gabriel River drainage.*

**Receiving Waters:** All surface water bodies within the permit area that are identified in the Basin Plan.

**Secondary Containment:** Structures, usually dikes or berms, surrounding tanks or other storage containers to catch spilled or leaked materials.

**Sediment:** Organic or inorganic material that is carried by or suspended in water and that settles out to form deposits in the storm drain system or receiving waters.

**Source Minimization:** Operational practices that reduce the amount of materials stored at a site.

**Standard Industrial Classification (SIC):** The statistical classification standard, organized by industry, underlying all establishment-based federal economic statistics. The SIC of a particular industry is determined using the latest Standard Industrial Classification Manual as prepared by the Executive Office of the President, Office of Management and Budget.

**Storm Drain System:** Streets, gutters, conduits, natural or artificial drains, channels and watercourses, or other facilities that are owned, operated, maintained or controlled by any Permittee and used for the purpose of collecting, storing, transporting, or disposing of storm water.

**Storm water:** Water which originates from atmospheric moisture (rainfall or snowmelt) and that falls onto land, water, or other surfaces.

**Storm Water Pollution Prevention Plan (SWPPP):** A plan required by and for which contents are specified in the General Permit for Storm Water Discharges Associated with Industrial Activities, and the

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**General Permit for Storm Water Discharges Associated with Construction Activities.** *The purpose of the plan is to help identify sources of pollution that affect the quality of storm water discharges from a site and to describe and ensure the implementation of practices to reduce pollutants in storm water discharges.*

**Storm Water Runoff:** That part of precipitation (rainfall or snowmelt) which travels via flow across a surface to the storm drain system or receiving waters. *Examples of this phenomenon include: the water that flows from a building's roof when it rains (runoff from an impervious surface); the water that flows into streams when snow on the ground begins to melt (runoff from a semi-pervious surface); and the water that flows from a vegetated surface when rainfall is in excess of the rate at which it can infiltrate into the underlying soil (runoff from a pervious surface). When all other factors are equal, runoff increases as the perviousness of a surface decreases.*

**Storm Water Runoff Mitigation Plan:** A plan, to be submitted prior to the submittal of an application for the first planning or building approval for a new development project, that sets forth storm water pollution controls to be incorporated into development projects. The plan must shall:

be designed to reduce the runoff volume from the site and the pollutant load contributed by the site through incorporation of design elements and practices that address each of the following goals:

- maximize, to the extent practicable, the percentage of permeable surfaces in order to allow more percolation,
- minimize, to the extent practicable, the amount of runoff directed to impermeable areas to the storm drain system,
- maximize, to the extent practicable, storm water filtration and storage for reuse through the use of sediment traps, cisterns or other means,
- minimize, to the extent practicable, parking lot pollution through the use of porous materials to allow percolation of storm water, through the installation of appropriate treatment controls, or through other means.

**Toxic Pollutant:** A pollutant present in levels above certain concentrations, known as the toxicity threshold, such that it is poisonous to human, plant, animal, or aquatic life.

**Waste Minimization:** Operational practices that reduce the amount of waste materials generated. Practices may include recycling and reuse.

**Watershed Management Area (WMA):** Any one of the six general watersheds covered by this NPDES storm water permit consisting of the Malibu Creek, Santa Clara, Dominguez Channel, San Gabriel River, Los Angeles River, and Ballona Creek watersheds.

**Watershed Management Committee (WMC):** A committee composed of representatives from each Permittee in a Watershed Management Area. Duties include establishing goals and objectives for the Watershed; prioritizing pollution control efforts; developing a specific Watershed Management Plan; coordinating and facilitating annual reports for the watershed; and facilitating compliance by Permittees in the watershed.

**Watershed Management Plan (WMP):** A plan for implementation of permit requirements that is based on the Countywide Storm water Management Plan but further addresses specific issues, pollutants of concern, and BMPs that are unique to the Watershed Management Area. The following terms are defined in the NPDES storm water permit. The question is: "Should they also be defined in the glossary?"

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600

October 25, 1995

**LOS ANGELES COUNTY MUNICIPAL STORM WATER DISCHARGE PERMIT (NPDES  
No. CA 61654, CI 6948) - SCHEDULE CHANGE**

Dear Public Works Officials and Interested Parties:

This letter is to update you on the permit renewal schedule changes resulting from the request of the Permittees' Executive Advisory Committee (EAC) as conveyed by the County in their letter of October 17, 1995.

Many of you have submitted comments to the County and the Regional Water Quality Control Board (RWQCB) on the September 15 version of the Municipal Storm Water Discharge Permit. Our initial review of your letters demonstrated to me the seriousness with which you approached the task and the many thoughtful comments you have developed. Although, as I indicated in my October 12 letter, we view the September 15 version of the permit as a rough draft, a "work in progress", we are delaying our permit renewal schedule in order to provide adequate time to respond thoroughly to the many comments received.

While we would have preferred to keep to the schedule leading to adoption of the permit at the January Board meeting, the EAC's request to review all compiled comments at their early November meeting means that the RWQCB will not receive the list of comments until November 9, 1995. By that point it will be impossible to complete all of the necessary steps leading to adoption at the RWQCB's January meeting. Because we do want to give careful consideration to your comments, and we believe supporting the activities of the EAC is critical to the long term success of storm water management in Los Angeles County, we have revised the target Regional Board adoption date.

The revised schedule is as follows:

- November 9           County submits EAC listing of permittee and other interested party comments to the RWQCB.
- Nov. 9 - 30           Board staff develops specific responses to comments and revises draft permit where appropriate. Board staff also completes in-house management/legal review and meets with regulatory agency partners.

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- Dec. 4 - 8 Board staff meets with the EAC and /or the Negotiating Team and other interested parties.
- Dec. 11 -15 Board staff makes final changes based on meetings.
- December 18 Draft permit mailed to all permittees for comments.
- Week of Jan. 8 Comments due the week of January 8 at the "all cities meeting" to be scheduled by the County/EAC.
- January 26 The tentative draft order mailed out for final comments and adoption at the Regional Board meeting to be scheduled for late February or early March. (Because of the added review period throughout the previous months, the tentative order review period will be reduced to 30 - 45 days.)

Regarding the issue of the Guidance Manual, we have had a number of cities call regarding contributions to its development. The primary question received is about the appropriate amount to contribute. Although there is no set amount expected or required, according to the Santa Monica Bay Restoration Foundation records, cities who have chosen to contribute fall into the following categories: cities with populations under 75,000 are generally contributing \$1000 and those over that size are contributing \$5000. The city and county of Los Angeles are each contributing \$20,000. If extra funds are contributed, money will be returned proportionately to that given.

The revised schedule for completion of the Guidance Manual is still under consideration. Our objective continues to be to distribute portions of the Manual as soon as possible, and the complete document for a sixty-day review period before it is finalized. The Manual is not a regulatory document and will not be adopted by the Board. It will be provided to the Board, however, for their information.

Thank you, again, for your suggestions for improving the municipal storm water permit. Please contact me at (213) 266-7515 or Carlos Urrunaga of my staff at (213) 266-7598 should you have any questions.

*Catherine Tyrrell*

CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

2000-1-19

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



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October 25, 1995

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*Catherine Tyrrell*

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 Assistant Executive Officer  
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1444 W GARVEY AVE RM 215  
WEST COVINA CA 91790-2144

LEON YEHUDA  
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13230 E PENN ST  
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50 CALIFORNIA AVE  
SOUTH GATE CA 90280-3075

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1414 MISSION ST  
SOUTH PASADENA CA 91030-3298

JOHN HYATT  
CITY OF TEMPLE CITY  
9701 E LAS TUNAS DR  
TEMPLE CITY CA 91780-2249

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4305 S SANTA FE AVE  
VERNON CA 90058-1786

DAN RADULESCU  
CRWQCB  
101 CENTRE PLAZA DR  
MONTEREY PARK CA 91754-2156

LARIVER.LBS  
JANUARY 4, 1995

KEN PUTNAM  
CITY OF MONROVIA  
415 S IVY AVE  
MONROVIA CA 91016-2888

ERNEST CUSFAN  
961 VERDUGO CIR DR  
GLENDALE CA 91206

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MANNY J MAGNA  
CITY OF ALHAMBRA  
41 S FIRST ST  
ALHAMBRA CA 91801-3796

WILLIAM C PAGETT  
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7100 S GARFIELD AVE  
BELL GARDENS CA 90201-3293

SAMUEL S JOHNSON  
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2535 COMMERCE WAY  
COMMERCE CA 90040-1487

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11333 VALLEY BL  
EL MONTE CA 91731-3293

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6550 MILES AVE RM 135  
HUNTINGTON PARK CA 90255-4338

MICHAEL KANTOR  
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600 S SPRING ST STE 400  
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415 S IVY AVE  
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16400 COLORADO AVE  
PARAMOUNT CA 90723-5050

JERRY WEDDING  
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117 MACNEIL ST  
SAN FERNANDO CA 91340-2993

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SIERRA MADRE CA 91024-2312

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240 W HUNTINGTON DR  
ARCADIA CA 91007-3499

ORA LAMPMAN  
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275 E OLIVE AVE  
BURBANK CA 91502-1267

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633 E BROADWAY RM 205  
GLENDALE CA 91206-4388

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1327 FOOTHILL BL  
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11330 BULLIS RD  
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WEN YANG  
CRWQCB  
101 CENTRE PLAZA DR  
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JANUARY 4, 1995

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VINCE MASTROSIMONE  
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20101 AGOURA CRT STE 102  
AGOURA HILLS CA 91301-2003

DALE E LIPP  
CITY OF CALABASAS  
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CALABASAS CA 91302

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MS LISA CROSSLEY  
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SANTA MONICA CA 90401-3325

MR CARLOS URRUNAGA  
CRWQCB LOS ANGELES REGION  
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DR GUANG-YU WANG  
SMBRP  
101 CENTRE PLAZA DR  
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RURAL.LBS  
JANUARY 30, 1995





**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

October 17, 1995

IN REPLY PLEASE REFER TO FILE WM-3

Ms. Catherine Tyrrell  
California Regional Water  
Quality Control Board  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Ms. Tyrrell:

**REVIEW OF DRAFT NPDES PERMIT**

The Executive Advisory Committee (EAC) has reviewed all of the chapters and sections we have been given to date, including those in the September 15th partial draft. Furthermore, the negotiating team of the EAC has met and conferred with you on many separate issues over many months and we have reached agreement on many of the issues. From this point forward, the EAC believes it would be most productive to receive a complete draft permit that encompass all the needed elements of an official NPDES Permit. We ask that such a completed draft include:

1. All of the agreed-upon points negotiated to date, without additional modifications by the Regional Board staff.
2. Changes made in response to the comments from the cities or the EAC based on the September 15 draft.

We recognize that it may not be possible to incorporate all of the cities' or EAC's comments into the draft but we ask that, if you choose not to include a proposal, that you respond to each suggestion and explain your decision to not include it. This process will help satisfy the concerns of agencies which believe their comments have not been given due consideration to date. It also allows your agency to demonstrate that it has reviewed and considered the concerns of the commenting agencies. It is essential that the completed draft or its accompanying memorandum make it clear to recipients that the EAC has neither reviewed nor approved the completed document. Upon receipt of the completed draft, we will be pleased to continue the meet and confer process.

Several cities have expressed concern that many of the requirements of the draft Permit are beyond the tasks mandated by the Federal Clean Water Act. Such concern can be avoided, if the draft Permit cites the section of the Federal Clean Water Act which specifically mandates the requirements.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

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Ms. Catherine Tyrrell  
October 17, 1995  
Page 2

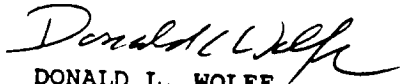
Finally, the schedule you presented at the October 12th EAC meeting projected the following time lines:

October 23	Revised draft mailed
November 6	Meeting of all Permittees to discuss draft
November 22	Permit revised based on comments and mailed as a tentative order
January 5	Revised Permit available for public review
January 22	Permit presented to the Board

We concur that an additional meeting to allow all Permittees to discuss the draft Permit prior to the 60 days public review period is very important. However, the schedule is clearly not achievable, given that a complete draft has not yet been prepared. We recommend that you revise the schedule based on your estimation as to when your staff can generate a complete draft Permit. Also, we recommend that commenting agencies be given a minimum four-week review period from the time a completed draft is distributed to them. Subsequently, Regional Board staff will need time to make further revisions based on comments received. Additional time may be needed for negotiation between the EAC and the Regional Board staff.

We appreciate your efforts in preparing a complete draft Permit and look forward to its receipt. If you wish to discuss the points raised in this letter, please contact me at (818) 458-4014.

Very truly yours,



DONALD L. WOLFE  
Chairman, Executive Advisory Committee

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

LOS ANGELES REGION

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(310) 266-7500  
FAX: (213) 266-7600



October 12, 1995

LOS ANGELES COUNTY MUNICIPAL STORM WATER DISCHARGE PERMIT  
(NPDES No. CA0061654, CI 6948)

Dear Public Works Official:

At a recent meeting of the group negotiating the storm water permit, your city representatives noted that a number of cities were experiencing difficulty with the review process for permit development. These city representatives felt they could not meet with the Regional Board staff to further develop the permit until the Executive Advisory Committee (EAC) had met to give them their "marching orders".

I am writing for several purposes. First, I want you to know that the Regional Water Quality Control Board fully supports your process to assure an accurate representative voice for cities in the negotiating of the permit. With such a large number of cities affected by the permit, a representative process is the only practical approach. We look forward to your city representatives involvement again, once the EAC has met.

Second, I want to apologize for suggesting in any way in my correspondence accompanying the distribution of the last version of the permit, that it represented either the final position of the Regional Water Quality Control Board or of the other representatives negotiating the permit. **The draft simply represented a "work in progress"** and was distributed to allow you maximum opportunity to affect the ultimate form and content of the permit.

Lastly, I am writing to you to clarify the permit review process. One of the issues raised was the lack of time to comment on draft permit language. In response to this concern, we have: a) delayed bringing the tentative order (the official final draft of the permit) to the Board until the January 22, 1996 meeting and, b) we have added another opportunity to review our "work in progress". As you recall, we had originally planned to bring the permit to the Regional Water Quality Control Board on December 5, 1995. By deferring until the January meeting, we can provide an additional opportunity for cities to review and comment on another "work in progress" before the permit is circulated for official public review on November 22, 1995 with comments due on January 5, 1996. The review schedule is as follows:

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- Oct 11      Receive comments (on draft mailed on September 15) and revise permit based on comments. (Comments received after this date will still be considered, but may not be addressed in the October 23d draft.)
- Oct 23      Mail out next revised Draft Permit.
- Nov 6        Meet with all Permittees (9:30 am) to discuss October 23d draft and identify issues remaining.
- Nov 22      Revise permit based on comments and mail out tentative order (This is the official draft of the permit with a two month comment and revision period.)
- Jan 5        Public review deadline for comments
- Jan 22      Incorporate comments and present at the Board meeting.

Also, because of the interest of EAC members in assuring that the permit is as understandable as possible, a guidance manual is being prepared by Camp, Dresser & McKee, Inc. through the contributions of various cities and the County of Los Angeles. To aid in your review of the final tentative order, portions of the Guidance Manual will be sent to you with the draft tentative on November 22. The full draft of the guidance manual will be sent out in early January for a 60-day review.

To provide additional opportunities to answer your questions, both Don Wolfe from LACDPW, and I will attend the Watershed Management Committees as often as possible while the permit is under development. Those meetings which we cannot attend will be attended by another Negotiating Team member so that you will always have the most current information on the status of permit negotiations.

Although the process of developing a municipal storm water permit that works for the municipalities of Los Angeles County is complex and challenging, I am convinced that we will succeed. I look to each of you to bring your best solutions forward to build a workable permit for Los Angeles County. If you should have any additional suggestions to facilitate permit development or review, please call me at (213) 266-7515 or Carlos Urrunaga of my staff at (213) 266-7598.

*Catherine Tyrrell*

CATHERINE TYRRELL  
 Assistant Executive Officer  
 Surface Water Programs

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# SIDLEY & AUSTIN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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NEW YORK  
WASHINGTON, D.C.

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LOS ANGELES, CALIFORNIA 90018-1010  
TELEPHONE 213 896 6000  
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LONDON  
SINGAPORE  
TOKYO

FOUNDED 1800

WRITERS DIRECT NUMBER  
(213) 896-6617

October 7, 1995

## VIA TELECOPY AND FIRST-CLASS MAIL

Ms. Catherine Tyrrell  
Assistant Executive Officer  
California Regional Water Quality  
Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754

Re: Municipal Stormwater Permit

Dear Catherine:

I am sorry that I missed you on Friday afternoon. I am writing because I will be out of town next week. I heard on Friday from David Beckman that you will be distributing at this coming Tuesday's permit negotiation session the monitoring program document which we sent to you last Wednesday. The County has no objection to such distribution. However, David also mentioned that you would like to distribute "Attachment A", which was attached to NRDC's original monitoring program proposal. This attachment describes the methodology used by Dr. Robert Pitt to select land use monitoring sites.

As you know, NRDC and the County still are working to finalize the language of the precise methodology to be followed in evaluating land use monitoring sites. As a result, it would be counterproductive to distribute Attachment A, as that document will be changed in a number of details. We expect to be able to finalize with NRDC the language of the land use site evaluation methodology later this week and, when the language is finalized, we will be sending you a revised methodology document. Therefore, we request that you wait for that final document before distributing the methodology to the permit negotiators.

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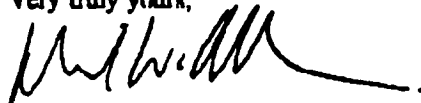
SIDLEY & AUSTIN

LOS ANGELES

Ms. Catherine Tyrrell  
October 7, 1995  
Page 2

I enjoyed meeting you, Carlos and Xavier last week to discuss the monitoring program for the new municipal stormwater permit. If you have any questions concerning this letter, please call Howard Gest at (213) 896-6633.

Very truly yours,



David W. Burhean

DWB:bj

- cc: Donald L. Wolfe, P.E.
- Gary W. Hildebrand, P.E.
- Judith A. Fries, Esq.
- David S. Beckman, Esq.
- Howard Gest, Esq.
- Laurine E. Tuleja, Esq.
- Holly L. Sutton, Esq.

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**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

September 20, 1995

IN REPLY PLEASE  
REFER TO FILE

WM-3

Ms. Catherine Tyrrell  
California Regional Water Quality  
Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Ms. Tyrrell:

**PROPOSED MONITORING PROGRAM FOR DRAFT NPDES PERMIT**

Enclosed for your review is the proposed monitoring program developed by the County for inclusion in the new stormwater permit.

We will be contacting you shortly to arrange a meeting to discuss this proposal.

If you have any questions, please contact Gary Hildebrand at (818) 458-5948, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Director of Public Works

  
DONALD L. WOLFE  
Deputy Director

GH:pl\LETTERS\DFTNPDS

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CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

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**PROPOSED MONITORING PROGRAM  
COUNTY OF LOS ANGELES  
DRAFT NPDES PERMIT FOR STORMWATER MANAGEMENT/URBAN RUNOFF**

**I. Introduction**

The following program is proposed by the County of Los Angeles in fulfillment of the monitoring program objectives contained in the forthcoming NPDES municipal stormwater permit. This program has been developed to meet the objectives for a monitoring program now being discussed by the permittees and the RWQCB.

The program proposed by the County differs substantially from the program approved by the Board under the old permit. Those differences reflect the experiences of County and RWQCB staff over the past five years in developing and implementing the monitoring program under the old permit (which, as the RWQCB knows, was the first such permit in the United States) as well as new understandings as to how monitoring programs should be designed and implemented.

The proposed program also has been developed in light of the County's staff and fiscal resources so as to maximize the utilization of those resources in meeting the objectives of the monitoring program. The County, like every other municipal permittee, must balance the need to obtain information through the monitoring program with the requirement to support other elements of the permit, including development of a comprehensive stormwater management plan. The County must focus its limited resources to developing information that will support the stormwater management program, as is set forth as the overall goal of the monitoring program in the draft Monitoring Program Outline circulated by the RWQCB.

The program outlined below consists of four elements: (1) a program for the monitoring of land use and mass emission sites; (2) a program for the inspection of the County-owned storm drain system to address the problem of illicit discharges and illegal connections; (3) a program for the intensive review of prioritized specific sources of suspected pollutants and of best management practices intended to control those pollutants; and, (4) a receiving waters study that will represent the first attempt ever to systematically evaluate the impact of stormwater and urban runoff on the beneficial uses of Santa Monica Bay.

**II. Mass Emission and Land Use Monitoring**

A. Mass Emission Monitoring -- The monitoring of mass emission stations is intended to provide input into a loads assessment model to estimate loadings of various pollutants. The pollutant loading information will be used by the permittees and the RWQCB to better develop the stormwater management program under the upcoming permit and future permits and to support a receiving waters study. The County is proposing to conduct monitoring at four mass emission stations. These stations are those currently located at Malibu and Ballona Creeks, the Los Angeles River and the San Gabriel River. These four stations sample runoff from the vast majority of the watersheds impacted by the municipal permit. The County would initially sample

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each station at a targeted frequency of ten storms a year, plus three 24-hour composite samples taken during dry weather periods.

This increased frequency of sampling is intended to provide event mean concentrations ("EMCs") for the constituents found in the watershed runoff to be used in a loads assessment model that would be run at the end of the third year of the permit.<sup>1</sup> This will allow for sufficient time to sample the appropriate number of storms needed to generate acceptable EMCs for use in the model. Constituents to be monitored in the mass emission runoff would include the full suite of analytes currently being monitored for under the old permit, using both automatic and grab sampling. If constituents were not found at or above their respective practical quantification limits in more than 25% of the samples, further analysis of such constituents would not be necessary. Following the third year of sampling, the frequency of sampling at the mass emission stations would be reduced to three storms per year per station.

B. Land Use Station Monitoring -- The monitoring of land use stations under the new permit also is intended to provide information which can be used in the loads assessment model, as well as to characterize the runoff from the most important land uses in the watersheds covered by the permit. In order to achieve those objectives, the County proposes the following:

1. Reevaluation of Land Use Station Locations: The County will reevaluate the location of the land use stations under the old permit. This reevaluation will involve reviewing the Southern California Association of Governments ("SCAG") database of major land use categories, reviewing the percentage of the watershed occupied by those categories and then aggregating the categories based on previous monitoring data and other factors.

If this review determines that there are some additional land use categories which should be monitored, certain of the existing stations will be relocated. The review may also result in the closure of other stations which reflect mixed land uses or are otherwise duplicative (as the RWQCB is aware, most of the existing land use monitoring station catchments contain more than 90% of the land use category of interest). For the two or three most important land use categories (those that reflect that greatest percentage of area in the watersheds), the County will sample at two stations reflecting that category.

2. Sampling: As with the mass emission stations, the frequency of wet weather sampling at each land use station would be increased to a target of ten storms per year in order to use the data gathered for the loads assessment model.<sup>2</sup> In addition, in the first year of monitoring under the new permit, to the extent that there was a consistent and sampleable dry weather flow at a land use monitoring station, three 24-hour composite samples would be taken of dry weather flow. If experience indicates that dry weather flow quality is relatively consistent

<sup>1</sup> In addition to samples taken under the new permit, samples taken at the four mass emission stations under the existing permit also would be used to develop the loads assessment model.

<sup>2</sup> Data collected at land use stations under the old permit also would be used for the model, where appropriate.

at land use stations, the County proposes to sample dry weather flow at a lower frequency in the second and third year of the permit.

The constituents to be sampled at the land use stations would be the full suite of analytes being collected under the current permit by automatic samplers. Routine grab sampling is not proposed for these stations both because grab sample data are not appropriate for inclusion in the loads assessment model and because grab sample constituents (e.g., bacteria, oil and grease) tend to be general indicators only. As with the mass emission sampling, if constituents were not found at or above their respective practical quantification limits in more than 25% of the samples, further analysis of such constituents would not be necessary. Following completion of the third year of sampling, the frequency of sampling at the land use stations would be reduced to two storm events per station per year.

### III. Storm Drain Inspection Program

A major goal of the municipal stormwater program is to identify and eliminate illegal connections and illicit discharges. The County already has commenced a program to survey its entire storm drain system to accomplish this goal. The County proposes to that this inspection program be incorporated under the new permit because it believes strongly that this method is the best way to eliminate illegal connections and illicit discharges. The alternative of field screening, which has been suggested by some, is not appropriate given the size of the County's storm drain system and the intermittent nature of such discharges. The vast majority of illegal discharges are expected to be intermittent, small-volume discharges which are highly unlikely to be discovered through field screening. Such discharges are best found through physical inspections, looking for evidence of flow, staining, discoloration, etc. Monitoring may be conducted as part of the inspection program.

### IV. Specific Source/BMP Study

A recent trend in municipal stormwater programs has been a refocusing of attention and resources away from extensive routine watershed and land use monitoring and toward the study of specific sources of stormwater pollutants. These sources typically consist of a single business or industrial use such as a service station, parking lot, plating shop, etc.

Specific sources are being studied by academic researchers and through municipal stormwater programs throughout the State and the country. Thus, it is important that resources not be wasted in duplicating these studies. We note that the State Storm Water Quality Task Force, of which the County is a member, is in the process of attempting to coordinate the evaluation of specific sources throughout California.

Another area being addressed more frequently is the evaluation of BMPs through water quality testing. While only one method to evaluate the effectiveness of BMPs, and one which may not be appropriate for a number of BMPs, such testing may provide very valuable information for the overall stormwater management program when applied in conjunction with the

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evaluation of a specific source. We also note that BMPs have been, and are being, evaluated throughout the State and the country and it is important not to duplicate these efforts.

The County is proposing the following specific source/BMP evaluation program:

1. Selection of Specific Sources to be Studied: The first phase of the program would be the selection of priority specific sources to be studied. The selection would be based, among other items, on the importance of the source in Los Angeles County (including factors such as prevalence in the County, assumed stormwater impact, etc.), the degree to which the source had been studied in other areas and the ability to obtain cooperation from the owners/operators of the source examples.

2. Design of Study: The County plans to examine three specific source types over the five-year span of the permit. This number is the largest which can be appropriately characterized by the County and as to which specific BMPs can also be applied. The County believes strongly that a focused, scientifically based study of critical specific sources is far better than a scatter-shot assessment of sources which may or may not be critical to the quality of stormwater from the Los Angeles County watersheds.

Following selection of the candidate sources, and during the first year of the permit, runoff from the first specific source type would be characterized. The County would seek to find six similar examples of each specific source type, so as to reduce the amount of variability inherent in sampling only a single example. Sheetflow from the six sites would be split into two "pools" reflecting three control and three test sites. Sheetflow from each pool, as collected during a targeted ten storm events, would be composited into a single sample for analysis. The samples would be analyzed for those pollutants anticipated to be found in the specific source runoff and such analytes would be partitioned, as appropriate, to determine the dissolved and undissolved portions.

Based upon the first year of characterization data, appropriate BMPs would be selected and installed at the test sites. Sheetflow from the control sources would again be composited and analyzed. With respect to the test sources, one (or as is more likely, a variety) of non-structural BMPs would be instituted at all or some of the test sites. Sheetflow from the test sites would be collected and analyzed. This comparison would allow a direct study of the effectiveness of the BMPs at the test sites. During the third year, the same or additional BMPs (and, possibly, structural BMPs) would be instituted and the runoff analyzed. The County believes that a three-year study is the appropriate period of analysis.

A similar program would be instituted with respect to the other two candidate specific source types, with the intent to finish all sampling by the end of the fifth year of the permit. The County also is willing to commit to select an alternative specific source if, after the first year's characterization, it was concluded that the originally selected source type was not appropriate for further analysis.

V. Receiving Waters Study

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Under the new permit, the County would undertake a study of the critical receiving waters into which the County watersheds drain. The County has questioned why the funding for such a study should be solely its responsibility, given the number of point source dischargers, wastewater treatment plants and other sources impacting the receiving waters.<sup>3</sup>

We are pleased to note that the proposed Monitoring Program Outline, in setting forth the major objectives of a monitoring program, noted that the assessment of receiving waters "may be a coordinated effort among point source dischargers, SCCWRP, etc..." The County is proposing to undertake just such a coordinated effort, one involving the most experienced and able investigators in this area, and focusing on Santa Monica Bay, the most critical receiving water in the County and one which is used by the greatest number of County residents for recreation. We note further that the County may be prepared to commence this study (provided the promised federal and non-federal funds or support is forthcoming) during this storm season.

The proposed receiving waters study would be a joint effort of the University of Southern California, the University of California at Santa Barbara and the Southern California Coastal Water Research Project ("SCCWRP"). In addition, the study would be done in cooperation with an ongoing toxicity study by investigators at UCLA. Funding for the study would be provided, in largest part, by the County. Co-funding, either direct or in terms of vessel support, also would be provided by the federal government through the Sea Grant program, by the City of Los Angeles and through SCCWRP. It must be noted that while the County is committed to funding a receiving waters study, the scope of that study may be affected by the availability of non-County funding sources.

A. Outline of Study -- The receiving waters study involves a plume study to determine the dispersion of stormwater runoff and associated sediment and a study of the benthic environment near two principal storm drains, Malibu and Ballona Creek. The plume study would be carried out by the USC Sea Grant program, under the leadership of Drs. Burton Jones and Libe Washburn. The benthic study would be carried out by SCCWRP, under the leadership of Dr. Jeffrey Cross, SCCWRP's Director. Both elements of the study will be carried out over two storm seasons, with the third year used for analysis of the data obtained in the previous years. Because the County hopes to begin the study during the 1995-96 storm season, information from the receiving waters study should be available by approximately the mid-point of the permit.

1. Plume Study: The plume study would examine the following issues, among others:
  - Mapping the spatial and temporal structure of the runoff plumes from Ballona and Malibu Creeks as they flow into Santa Monica Bay following strong winter storms.

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<sup>3</sup> We note that the County has partially funded a study now being conducted by the Southern California Coastal Water Research Project of the impacts of dry weather flows in river discharge areas in the Southern California Bight.

- Examining the interaction between the runoff plume and ocean processes as they affect the advection, dispersion, and mixing of the plume.
- Evaluating the impact of storm runoff plumes on beneficial uses of the coastal ocean.
- Characterizing the optical properties of the suspended particulate material ("SPM") and dissolved organic material ("DOM") associated with runoff sources.
- Examining the effects of DOM and SPM on the water column optics and the distribution of nutrient concentrations, as the same may affect phytoplankton productivity.
- Helping to establish appropriate locations for benthic study stations.

2. Benthic Study: The benthic study would measure the following parameters:

- Water quality (dissolved oxygen, salinity, density, temperature, light transmissivity and Ph).
- Sediment grain size, sediment organic concentrations and sediment contaminant concentrations.
- The structure of the benthic invertebrate community.

The benthic study would employ the same methods used in studies of dry weather impacts in river discharge areas carried out by SCCWRP in 1994 and 1995 in the entire Southern California Bight. Four stations would be occupied near each creek mouth.

3. Coordination with UCLA Toxicity Study: At the present time, researchers from UCLA are involved in an ongoing Santa Monica Bay Restoration Project study of the toxicity of stormwater runoff in Ballona and Malibu Creeks. The County receiving waters study will be coordinated with the UCLA study to maximize the utility of the information obtained by both studies.

To provide further information on the planned receiving waters study, a proposal drawn up for the County by the USC Sea Grant program is attached for your review.



Sea Grant

Sea Grant Institutional Program  
Hancock Institute for Marine Studies • University of Southern California  
University Park • Los Angeles, CA 90089-0373 • (213) 740-1961 • Fax (213) 740-5936

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DEPARTMENT OF PUBLIC WORKS  
WASTE MANAGEMENT DIVISION

September 7, 1995

Mr. Gary Hildebrand  
Los Angeles County Department of Public Works  
900 S. Fremont  
Alhambra, CA 91803

Dear Gary:

The USC Sea Grant Program is pleased to submit the attached Preliminary Proposal in response to your August 31, 1995 request.

This proposal represents a collaborative effort among researchers from the University of Southern California (USC), the University of California at Santa Barbara (UCSB) and the Southern California Coastal Water Research Project (SCCWRP). Additionally, we intend to cooperate with ongoing studies by investigators at the University of California at Los Angeles (UCLA).

As described in the proposal, this three year effort can commence in the fall of 1995 if sufficient funding for the first year can be identified by the County. Due to existing project commitments, the USC Sea Grant Program cannot provide the majority of its funding for the Jones/Washburn project until the 2nd and 3rd years. However, I would like to reiterate that this project remains our highest research priority for these years of funding. This rating is due to the significance of the issue of stormwater discharges in Southern California, the quality of the proposed research and the credentials of the research team. During our last proposal review cycle, the Jones/Washburn project received the highest peer review rating of any project we considered, and was one of very few projects that received a "High Priority" rating from the State of California's Resources Agency Sea Grant Advisory Panel (RASGAP).

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The proposed effort spans two years of sampling and a final year of analysis and report preparation. As submitted, this proposal includes alternatives for sampling after either six or eight storms over the initial two years of the project. The attached budget presents the funds required from the County and Sea Grant under each of these alternatives.

I would also like to point out that we recently received a verbal commitment from the City of Los Angeles to provide shiptime for the Ballona Creek and possibly the Malibu Creek sampling locations. If the City cannot provide shiptime for the Malibu Creek location a small amount of additional funds will need to be provided by both the County and Sea Grant for an alternate vessel. It is also anticipated that the City will be able to provide some measurements of microbial indicator abundance at the selected beach and ship sampling sites.

If the County would like additional information or details about this Preliminary Proposal, please contact D. Patrick Hartney, the Associate Director of the USC Sea Grant Program and the coordinator of this project. After your review and comment, a Final Proposal signed by an official of USC can be submitted to the County within a few days.

Sincerely,



Douglas J. Sherman  
Director

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PRELIMINARY

**BOARD OF TRUSTEES  
UNIVERSITY OF SOUTHERN CALIFORNIA**

September 1995

TO: Gary Hildebrand  
Los Angeles County Department of Public Works  
900 S. Fremont  
Alhambra, CA 91803

TITLE OF PROGRAM: Study of the Impacts of Stormwater Discharges  
on the Beneficial Uses of Santa Monica Bay

AMOUNT REQUESTED:

STARTING DATE: October 1, 1995

DURATION: 36 months

PRINCIPAL INVESTIGATORS:

\_\_\_\_\_  
Burton H. Jones  
Research Associate Professor  
Dept. of Biological Sciences & Ocean Physics  
Group  
Dept. of Earth Sciences  
University of Southern California

\_\_\_\_\_  
Libe Washburn  
Associate Professor  
Dept. of Geography  
University of California, Santa Barbara

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Jeffrey N. Cross  
Executive Director  
Southern California Coastal Water Research Project

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**STUDY OF THE IMPACTS OF STORMWATER DISCHARGES  
ON THE BENEFICIAL USES OF SANTA MONICA BAY**

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**I. INTRODUCTION**

**Statement of the Problem**

Stormwater runoff reaches Santa Monica Bay during a relatively few major storm events each rainy season, carrying not only large volumes of freshwater but an accumulation of debris and anthropogenic contaminants which may or may not affect the ecosystem in harmful ways. The episodic increase in volume of water, and the associated burden of sediments, may affect the receiving waters and the benthos in a number of ways physically, even if no contaminants are present, but the impacts of associated contaminants are unknown. Stormwater plumes have identifiable water quality characteristics based on salinity, temperature, particulate burdens, optical characteristics, etc. which differentiate them from receiving waters and which facilitate mapping their extent and dispersion pattern. No studies have been made of the spatial extent of the plume during storms of various intensities, nor have benthic biota and sediment chemistry been examined in the context of storm events. This information is needed to determine whether the stormwater runoff and its concomitant burden impact the beneficial uses of the ocean, including Santa Monica Bay (California Ocean Plan, 1990, 1995).

The County of Los Angeles (County) is a co-permittee with the municipalities of the County holding an NPDES stormwater permit for discharge into the Bay. The first permit was issued in 1990 and a five year renewal is currently being negotiated with the RWQCB. Recently, the Natural Resources Defense Council (NRDC) has sued the County, accusing them of non-compliance with the initial permit. The County has vigorously denied the allegations. However, dialogue has taken place as to the nature and content of research studies needed to determine whether beneficial uses are being impacted, and, if so, what measures might be undertaken to ameliorate the impacts. Studies will focus on flow from Ballona Creek and Malibu Creek into Santa Monica Bay. NRDC recommended that studies be performed such as characterization of plumes, and examination of benthic organisms and the chemistry of sediments in which they occur. Other studies on toxicity using bioassays are underway with State funding; results of this research will be useful in developing conclusions from the proposed research.

**II. GOALS AND OBJECTIVES OF PROPOSED RECEIVING WATER STUDIES**

The principle goal of the coordinated receiving water studies proposed herein is to determine the impacts, if any, of stormwater runoff from Ballona Creek and Malibu Creek on the beneficial uses of the receiving waters.

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The objectives identified by the County include;

Identification of those impacts which result from the urban environment versus those that may result from natural conditions.

Identification of the components (contaminants) of stormwater discharges, if any, which may result in impacts on the beneficial uses.

Determination of the significance of impacts on the beneficial uses, if any, including the period of impact, area of impact and the importance of the beneficial uses impaired.

**Beneficial Uses**

The beneficial uses of the ocean, as restated in the California Ocean Plan (Amendments August 1995) include the following;

industrial water supply, water contact and non-contact recreation, including aesthetic enjoyment, navigation, commercial and sport fishing, aquaculture [mariculture], preservation and enhancement of Areas of Special Biological Significance, rare and endangered species, marine habitat, fish migration, fish spawning and shellfish harvesting. The 1990 Ocean Plan used the phrase 'protection and enhancement of marine life'.

These uses or criteria have been summed up in the public's questions: Are the waters swimmable? Are the fish edible? Is marine life being protected?

**Meeting Ocean Plan Objectives and Other Criteria**

One difficulty for the County and other permittees is that no dilution zone is permitted for stormwaters, as it is for point sources, for meeting the Ocean Plan water quality objectives. Since Ballona Creek and Malibu Creek are storm drains, they are required to comply, at present, with water quality objectives at the openings into the ocean. Also, there are no Ocean Plan objectives for sediments. Use of NOAA (1990) criteria for sediment concentrations show that sediment samples taken from Ballona Creek at the Pacific Avenue bridge and at the mouth of the Creek between the jetties have fallen within the ranges of effects on sensitive species and developing organisms for parameters including lead, mercury, zinc, chlordane, DDTs and Aroclors (Soule et al, 1993). Such contaminated sediments are carried into the Bay during storms, with their ultimate fates and effects unknown. Dredged material from the mouth of Ballona Creek was not eligible for dumping at the local EPA dumpsite because of unacceptable lead concentrations and the results of bioassay tests required by the US Army Corps of Engineers and EPA.

Fecal contamination of beaches has been identified as a major public health problem during stormwater runoff events. The extent to which the stormwater plumes are contaminated is not known. Currently, beaches are quarantined for 72 hours following rainstorms.

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Planning for upstream control of contaminants (Best Management Practices) depends on identification of the fate and effects of stormwater plumes and determination of their impacts on the biota.

Available Scientific Resources

There are several entities in the local area with the expertise and capabilities to design and implement a cooperative program. These include, but are not limited to, the federal and state supported Sea Grant Program at the University of Southern California (USC), which brings investigators from USC and other southern California institutions together to perform applied programs having both regional and national importance. A three-year plume study planned, under the direction of Drs. Burton Jones and Libe Washburn, to begin in 1996-1997 could be modified with County assistance to begin in 1995-1996 and include both Ballona Creek and Malibu Creek. The head of the USC Sea Grant Advisory Services, Dr. Sue Yoder, is a member of the Technical Advisory Committee (TAC) of the Santa Monica Bay Restoration Project (SMBRP), and as such, can coordinate access to information on other research projects in the area of concern, providing activities and/or results which can be melded into the studies proposed herein.

Results of one project relevant to the proposed studies is a dry weather contamination study of Ballona Creek, performed by UCLA under funding from the State through SMBRP. Results of 1992 studies showed the presence in storm drain water of 65 volatile organic compounds, 70 base neutral organic compounds (semi-volatiles), 25 chlorinated pesticides and 20 polychlorinated biphenylic compounds (Suffet et al., 1993). No water sample levels exceeded the concentrations in the proposed water quality objectives of the Ocean Plan, however.

The Southern Coastal Water Research Project is partly funded by the county sanitation districts in southern California and by contracts and grants from federal, state or local agencies. SCCWRP is currently performing a benthic survey of stations in Santa Monica Bay that were previously occupied in a dry weather year to determine whether there were effects on the biota following the record rains of 1994-1995. Other stations must be examined in the context of the plume studies, which may or may not indicate overlap with the earlier SCCWRP stations. The study, under Director Jeff Cross, will examine benthic species distribution and sediment chemistry at selected stations.

The County has records on mass discharges from Ballona Creek and Malibu Creek and many years of data on contaminants in grab samples taken during storm flow. These and other records should be examined to determine contaminant loading.

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**Coordination**

The Sea Grant Program Associate Director, D. Patrick Hartney, will serve as coordinator of the scientific research program. A coordinator appointed by the County will serve as liaison. At present, Dr. Dorothy Soule, a County consultant, is coordinating the proposal preparation effort for the County.

**III. PROPOSED PLAN OF RESEARCH**

A coordinated program of research is proposed to study the factors that bear on the impacts on beneficial uses. The following areas of research include:

The nature and extent and longevity of plumes formed during stormwater events, including the nutrients, contaminants and suspended particles present, (Task A),

The effects of stormwater plumes on the benthic communities of the Bay, including sediment chemistry (Task B).

**Task A: Dispersion and Mixing of Storm Water Runoff into Santa Monica Bay**

**1. Introduction:**

This proposal and the collaborative benthic study proposal of SCCWRP (Task B) present an approach for examining the dispersion of storm water runoff plumes from two sources, Ballona Creek and Malibu Creek, and evaluating the effects on beneficial uses of the coastal ocean. The collaboration of these two research programs provides the opportunity to study both the physical dispersion of the runoff plumes in the coastal ocean and their effects on the living environment.

It is proposed that funding for this study come from two sources, Los Angeles County and the NOAA Sea Grant program at USC. The research therefore has a two-fold purpose: 1) to evaluate the effects of storm water runoff on beneficial uses of the coastal ocean; and 2) to provide basic scientific understanding of the dynamical characteristics of such plumes and the development of technological approaches for studying runoff plumes in the coastal ocean.

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## 2. Investigatory Questions:

1. How do the structures of the storm runoff plumes from Ballona Creek and Malibu Creek evolve spatially and temporally as they are mixed and dispersed by physical oceanographic processes in Santa Monica Bay? How is dispersion of the plumes affected by the runoff-produced stability of the upper water column? What are the along shelf and cross-shelf length scales of the runoff plumes?
2. What is the spatial distribution of the suspended particulate matter (SPM) and dissolved components of the runoff plume? Do resuspension events contribute significantly to the SPM load of the plume as it spreads into Santa Monica Bay? Do the SPM and dissolved plume components remain highly correlated as the plume spreads or do they de-couple as dispersion proceeds?
3. What are the spectral absorption and scattering characteristics of the SPM and dissolved components of the plume? Can these characteristics serve as unambiguous tracers and can they be used to map the plume over long distances? What information can these characteristics provide about the composition of the particle fields and their spatial distributions. What information can they provide about biological processes associated with the plume?

## 3. Motivation:

Much concern has been expressed about the effects of runoff source inputs of contaminants into coastal waters like Santa Monica Bay, however, little research has focused on detailed studies of the dispersion and fate of these inputs. Therefore, any study of the dispersion of these inputs is a major step toward understanding the processes affecting the local coastal ocean.

The runoff systems in southern California differ from those in other areas in that the flow is mostly confined to the winter months. During the dry months, contaminants accumulate in the flow systems and are then released as pulses when the winter storms strike. During winter storms these drainage systems release most of the fresh-water that flows into the coastal ocean.

Several factors contribute to our choice of the Ballona Creek outflow as our study site:

- 1) It is a major source of contaminants for Santa Monica Bay.
- 2) It is the largest, non-sewage freshwater inflow into the Bay.
- 3) It is an important site because the adjacent beaches and Marina del Rey are heavily used recreational areas.
- 4) It is conveniently located. The other three major river outflows are around the Palos Verdes Peninsula to the southeast.
- 5) The Ballona Creek system is tractable for study because its size and flow rates permit comprehensive mapping of the plume both spatially and temporally. It produces a large freshwater plume in Santa Monica Bay during storms and it opens directly into Santa Monica Bay.
- 6) Its particulate and chemical characteristics are sufficiently distinct, based on previous research (Soule, et al., 1992), to provide traceable water characteristics.

In studying the effects of a runoff plume like that from Ballona Creek, one of the key issues is the identification and differentiation of particle fields and dissolved substances. We propose to use newly developed spectro-optical techniques for this purpose. In previous research at the Whites Point outfall, our group developed methods combining bio-optical and physical measurements to differentiate sewage effluent plumes from naturally occurring particle fields. These methods have been very successful and have been adopted by local sanitation district monitoring programs; we will employ these proven techniques at the Ballona Creek site. However, we anticipate that the plume at Ballona Creek will contain a greater variety of particles and dissolved substances and may be more difficult to identify as it disperses into Santa Monica Bay. It is our contention that new spectro-optical methods will enable us to improve the detection and differentiation of specific particle types and to examine the dispersion of the runoff plume in great detail. A major thrust of the proposed work will be to apply new measurement techniques to the general problem of coastal pollution.

#### 4. Task A Goals and Objectives:

The specific objectives of this research program are to:

1. Map the spatial and temporal structure of the runoff plume from Ballona Creek and Malibu Creek as they flow into Santa Monica Bay following strong winter storms.
2. Examine the interaction between the runoff plume and ocean processes as they affect the advection, dispersion, and mixing of the plume.
3. Evaluate the impact of these storm runoff plumes on the beneficial uses of the coastal ocean.
4. Characterize the optical properties of the suspended particulate material (SPM) and the dissolved organic material (DOM) that are associated with the runoff sources.
5. Evaluate the use of spectro-optical techniques for differentiating DOM and SPM in field studies of pollution in the coastal ocean.
6. Examine the effects of DOM and SPM on the water column optics and the distribution of nutrient concentrations which can affect phytoplankton productivity which can in turn affect beneficial uses of the coastal ocean..

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## 5. Methods:

Field sampling will consist of several types of measurements to study the dispersion of freshwater inputs from river sources during winter storms. Continuous mapping of physical and optical properties (including natural tracers) will be performed with a towyo system that we have developed and used successfully for sewage outfalls (Washburn et al., 1992; Jones et al., 1993; Wu et al., 1994). In addition, batch water samples will be obtained for laboratory analysis to provide calibration and verification of our physical and bio-optical methods. As seen in Figure 2, the towyo method provides detailed two dimensional cross-sections that are not easily obtained by other methods. These methods provided some of the first detailed in situ cross-sections of effluent plumes and as seen in Figure 2, can provide equally detailed cross-sections of runoff plumes.

Four cruises following storm runoff events are planned for the winter season, November-March, in each of two field years. An additional cruise during non-storm or "dry" conditions will serve as a control for comparison of with the water column as affected by storm runoff. During the cruises, we will map the along shelf and cross-shelf distributions of physical and bio-optical variables along the coast in both directions from the river mouth. Considerable flexibility must be allowed in the field sampling plan so that a comprehensive survey of the plume can be carried out. We will conduct the primary cruises as soon after storm events as is practical; previous experience at Whites Point has shown that sampling during the height of winter storms is unrealistic due to personnel and equipment safety considerations. Because the river flow continues for several days, we plan to sample as soon as the weather permits and a research vessel is available.

The plume mapping will consist of a series of long cross-shelf sections, typically between 1 and 5 km in length, extending away from the river mouth at intervals of between 0.5 and 1 km (Fig. 1). Both the cross-shelf and along shelf extent of these sections will be determined based on real-time observations of the plume. We expect these sections will extend mainly along-shore because, river plumes often tend to advect along shore as they are entrained by the coastal currents (e.g. Garvine, 1982). This advection may reduce offshore spreading near the mouth, but ocean mixing processes will probably expand the plume offshore away from the mouth. Although Hickey has measured mean near shore currents during winter that were directed southward toward Playa del Rey (Hickey, 1993), we will be prepared to map in whichever direction the plume is spreading. To aid in this determination, we will seek the aid of volunteer general aviation pilots (e.g. Mr. Anthony Felino of UCSB) to provide aerial reconnaissance of the plume's orientation during our sampling. Post-cruise (and possibly real-time) analysis of satellite remote sensing imagery from AVHRR, SeaWIFS and other sensors will also be examined to help us interpret our observations.

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Our tow-yo system, with various physical and bio-optical sensors, has proven very effective in differentiating particle fields in the coastal environment and for mapping their spatial distributions over short time scales. The basic tow-yo system for field operations includes the following sensors:

1. Sea-Bird CTD (measures pressure, temperature and depth with high accuracy)
2. chlorophyll a fluorometer
3. transmissometer (660 nm source, 0.25 m path length)
4. photosynthetically available radiation (PAR) sensor.
5. AC-9 spectral absorption meter and transmissometer  
(Wavelengths: 412, 456, 488, 532, 560, 650, 660, 676, and 715 nm)

The AC-9 spectral absorption/beam attenuation instrument (Western Environmental Technical [WET] Laboratories, Philomath, OR) measures optical absorption and beam attenuation simultaneously at nine visible wavelengths which provide inherent optical properties at these wavelengths. We expect to find several different types of particles in the runoff plume including: terrigenous inorganic particles, terrestrial plant material, resuspended sediments that include organic material, and marine phytoplankton. We hypothesize that these particles will have different spectral optical signatures that will enable us to differentiate them with high resolution on the basis of their inherent optical properties.

One approach to resolving the contribution of particulate and dissolved components is to obtain profiles with and without a filter on the inflow port to the AC-9. High volume filters with a nominal pore size of 0.2 or 0.4 microns, can be placed at the intake to obtain profiles of the spectral absorption and beam attenuation of the dissolved (non-filterable) components of the water column. Comparing the filtered profile with the unfiltered profile provides one method for discriminating the contributions of particulate and dissolved components to the inherent optical properties of the water column.

Batch samples will also be obtained to help with validation and calibration of the continuous physical and bio-optical measurements. At sea, bottle profiles will be obtained with a CTD rosette system. The sets of analyses that are expected to be performed on the bottle samples are listed in Table 1.

Batch samples will be obtained from Ballona Creek at the Pacific Avenue bridge near its mouth to provide a reference for the source water of the Ballona Creek plume. The samples will be analyzed for the same variables as measured from the rosette samples. Surf zone samples will be obtained along the beaches in the direction that the plume is expanding from the mouth of the creek. These samples will be analyzed for the same variables measured in the rosette bottle samples.



We will also obtain continuous underway measurements of the near-surface temperature, salinity, chlorophyll fluorescence and nutrient ( $\text{NO}_3$ ,  $\text{NO}_2$ ,  $\text{NH}_4$ ,  $\text{SiO}_4$ , and  $\text{PO}_4$ ). Because of the high concentrations of inorganic nutrients often observed in Ballona Creek, and the low salinity, these variables provide sensitive tracers of the soluble portions of the freshwater plume as it spreads laterally in the ocean. Because upwelling is not likely to be associated with the storms, we do not expect to find significant concentrations of nutrients in the upper layer apart from the influx from the storm water runoff.

**Table 1 - Table of batch measurements expected to be made on batch samples obtained during the Ballona Creek plume study.**

<u>Measurement</u>	<u>Group responsible</u>
Nutrient concentrations ( $\text{NO}_3$ , $\text{NO}_2$ , $\text{NH}_4$ , $\text{SiO}_4$ , $\text{PO}_4$ )	USC
Chlorophyll - acetone extracted	USC
Laboratory analysis of a and c for different particle sources	USC
Suspended particulate matter	UCSB
Particle size spectra	UCSB
Salinity samples	USC
Indicator microbiology	City of Los Angeles

In addition to the tow-yo measurements, the Ocean Physics Group at USC and the Center for Remote Sensing and Environmental Optics (CRSEO) at UCSB are already evaluating the most effective quantitative approaches for examining particle fields in several oceanic regions. The USC group is applying these techniques to observations of the outfall systems at Honolulu, Hawaii and at White's Point, California. Our observations off the Palos Verdes peninsula during a winter storm in February 1992 demonstrate the effectiveness of the tow-yo system for mapping particle fields from different sources (Figure 2). Three primary particulate fields are important in this region during dry periods (Wu et al., 1994; Washburn et al., 1992): 1) near-surface non-phytoplankton particulate material that correlates with low salinity, which can be attributed to runoff, 2) resuspended sediments which increase near the bottom, and 3) phytoplankton which are highest in the upper layer and decrease with depth. We expect additional components will be important at the Ballona Creek outflow.

The proposed work described above depends solely upon the use of "natural" tracers, i.e. those components of the runoff and coastal ocean which are clearly differentiable from each other. These natural tracers include variables such as salinity, nutrient concentration, and particle concentration and characteristics. In the event that the natural tracers do not provide the full amount of information desired for this effort, added tracers such as Rhodamine WT or fluorescent particles can be considered for the second field year. However, use of these added tracers will require additional funding because the tracers are expensive and will require added analysis costs.

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**6. Collaborative Efforts:**

The water column study of the plume dispersion is tightly coupled with the proposed SCCWRP study of the benthic content and biological community near the two creek outflows (Task B). These sampling efforts will be coordinated so that the interaction of water column processes and the benthic processes can be evaluated in terms of the beneficial uses of the coastal ocean.

The City of Los Angeles has kindly agreed to provide ship time, as available, for the study of the Ballona Creek outflow. We also expect that they will be able to provide some measurements of microbial indicator abundance at the selected beach and ship sampling sites. It is not clear at this time whether or not they will be able to provide ship time for the study of the Malibu Creek outflow. If this is not possible, then additional funds will be needed for a vessel such as the SCMSI R/V Sea Watch or a similar vessel for the Malibu Creek study.

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Sediment grain size will be analyzed by laser particle analyzer. Organic content (carbon and nitrogen) will be analyzed by a Carlo Erba CHN analyzer. Metals will be analyzed by ICPMS or atomic absorption spectrophotometry after sample digestion. Mercury will be analyzed by cold vapor technique. Organic compounds will be extracted with solvents and cleaned to remove interfering substances. PAHs will be analyzed by GC/MS or HPLC. Organochlorine pesticides and polychlorinated biphenyls will be analyzed by GC/ECD.

### III. DELIVERABLES

The participating Principal Investigators at SCCWRP and USC/UCSB will provide annual progress reports and a single final report after all sampling and data analysis are completed which encompasses and summarizes the findings of all PI's. This final report will be coordinated by the USC Sea Grant Program.

This final report will identify major impacts of two major storm water discharges, Malibu Creek and Ballona Creek, in Santa Monica Bay as follows:

1. It will identify the extent and degree of impairment of these storm water sources on the benthic community. It will compare water quality, sediment grain size characteristics, and sediment organic and contaminant loads both within and outside the benthic areas immediately affected by the plumes. It will identify the dispersion pattern of the plumes in the local environment, the pattern and extent of particulate fallout from the plumes (i.e., the plume's "footprint" in the environment). It will measure structure and composition of the benthic faunal community both within and outside the dispersion zone of the plume.
2. It will identify the extent and degree of potential impairment to the water column community. It will measure degree of light attenuation which can decrease primary productivity in the water column. It will measure fine particulate loading and dispersion which could provide a channel for contaminants to move into the food chain. It will measure fresh water and nutrient loading which could lead to short-term dinoflagellate blooms which could adversely affect local fish and shellfish. Maps of the plume distribution during each storm sampling period will be provided. Plume maps will differentiate soluble and particulate fractions.
3. It will identify the extent and degree of potential impact to nearby beaches by measuring patterns of dispersion of the plumes in the bay environment of the specific storm events measured in this study. Such impacts could affect the aesthetic value of the beaches, the health of swimmers and surfers due to microbial impacts.
4. It will identify possible impacts to the success of local fishermen both onshore and near shore due to specific impairments to the benthos and receiving waters as specified in #1 and #2 above.

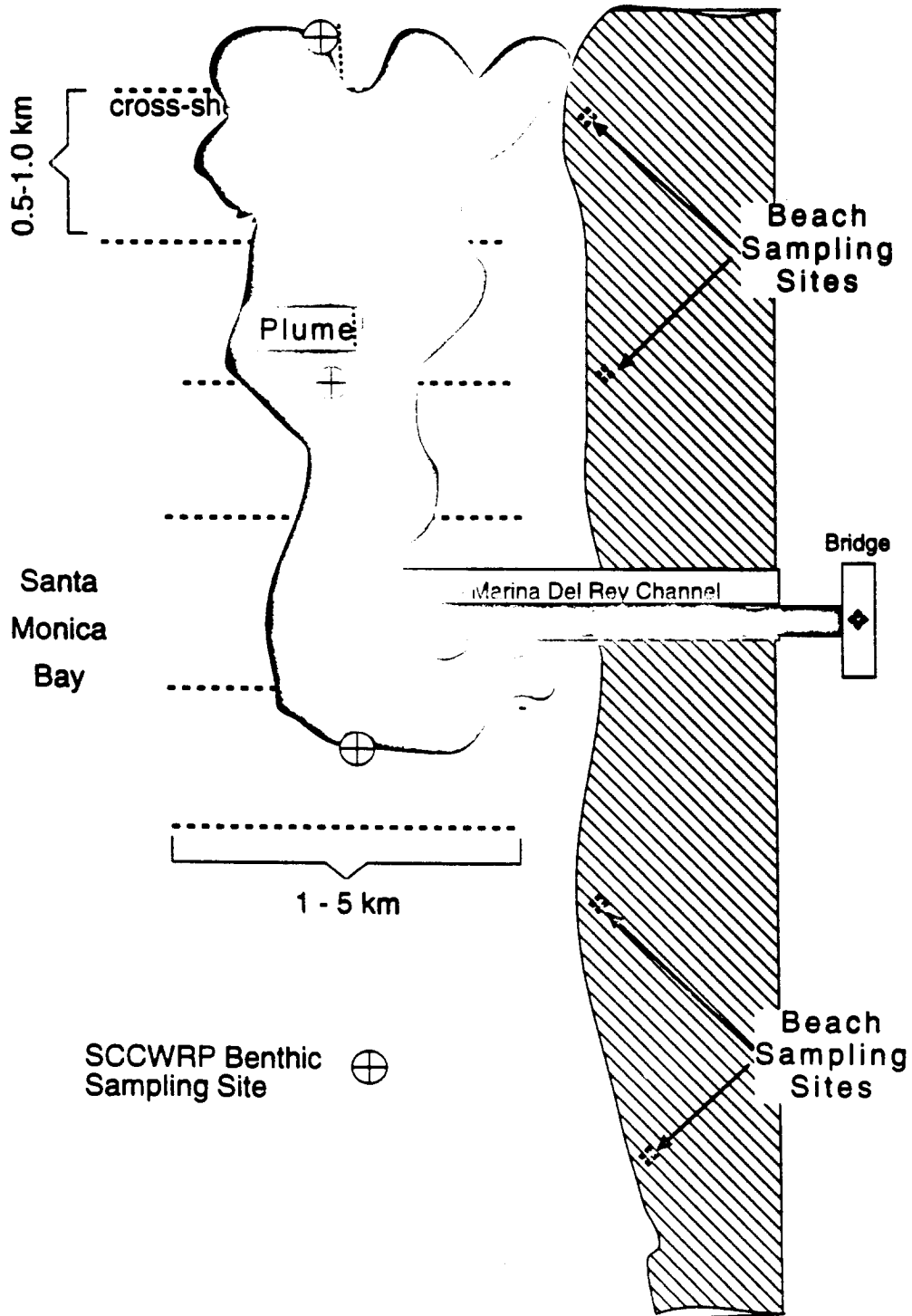
5. To the extent possible, it will make inferences about impacts of anthropogenically-originating contaminants on the benthos and water column and nearby beaches versus possible impacts from a natural creek where contaminant load is significantly lower.

In addition to the final report, the portion of this project contributed by Jones and Washburn (Task A) will test new technological approaches for further study of the runoff plume dynamics. Their results will be published in refereed professional journals.

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Figure 1. Schematic of the runoff plume for Ballona Creek and suggested sampling grid in the case where the plume is advecting northward along the coast. The orientation of the plume, and hence the specific layout of the sampling grid, will depend on the meteorological and oceanographic conditions at the time of the runoff event. Therefore, the specific sampling layout will have to be determined at the time of sampling.



PRELIMINARY

**Budget  
Alternative 1: Eight Storms**

	Year 1 (10/1/95-9/30/96)		Year 2 (10/1/96-9/30/97)		Year 3 (10/1/97-9/30/98)		TOTAL	
	L.A. County	Sea Grant	L.A. County	Sea Grant	L.A. County	Sea Grant	L.A. County	Sea Grant
	<b>Task A:</b>							
USC (Jones) and UCSB (Washburn)	90,000	10,000	45,000	55,000	10,000	80,000	145,000	145,000
<b>Task B:</b>								
SCCWRP (Cross)	85,000		80,000		40,000		205,000	
<b>Total</b>	<b>\$175,000</b>	<b>\$10,000</b>	<b>\$125,000</b>	<b>\$55,000</b>	<b>\$50,000</b>	<b>\$80,000</b>	<b>\$350,000</b>	<b>\$145,000</b>

**Budget  
Alternative 2: Six Storms**

	Year 1 (10/1/95-9/30/96)		Year 2 (10/1/96-9/30/97)		Year 3 (10/1/97-9/30/98)		TOTAL	
	L.A. County	Sea Grant	L.A. County	Sea Grant	L.A. County	Sea Grant	L.A. County	Sea Grant
	<b>Task A:</b>							
USC (Jones) and UCSB (Washburn)	80,000	10,000	45,000	55,000	10,000	70,000	135,000	135,000
<b>Task B:</b>								
SCCWRP (Cross)	65,000		60,000		30,000		155,000	
<b>Total</b>	<b>\$145,000</b>	<b>\$10,000</b>	<b>\$105,000</b>	<b>\$55,000</b>	<b>\$40,000</b>	<b>\$70,000</b>	<b>\$290,000</b>	<b>\$135,000</b>

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**Memorandum**

to : County of Los Angeles  
Municipal Permittees  
*Catherine Tyrrell*  
Catherine Tyrrell  
Assistant Executive Officer

Date: September 15, 1995

File :

From : CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—LOS ANGELES REGION  
101 Centre Plaza Drive, Monterey Park, CA 91754-2156  
Telephone: (213) 266-7500

Subject: GENERAL MEETING TO DISCUSS DRAFT NPDES PERMIT

Attached is the most recent copy of the Draft LA County Municipal Storm Water Discharge Permit. As you know, the negotiating team has been meeting frequently to finalize this permit. This version represents decisions reached up through our most recent meeting on September 11, and should reflect the comments received by the EAC from your last review. Additionally, the permit has been strenuously edited and reformatted by Regional Board staff over the remainder of the week. Throughout the editing process we have made every effort to retain the intent of the negotiating team's agreements while adding clarifications critical to the Regional Board.

We are providing this draft to again obtain your feedback on our progress in developing a useful permit. I and the negotiating team look forward to your comments at the next general Permittee update meeting to be held on September 27, 1995, at 9:30 am, at the Los Angeles County Department of Public Works headquarters at 900 South Fremont Avenue in Alhambra.

If you have any questions or comments, please call me at (213) 266-7515, Carlos Urrunaga at (213)266-7598, or Gary Hildebrand of the LA County Public Works at (818) 458-5948.

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September 15, 1995

State of California  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, LOS ANGELES  
REGION

ORDER NO. 95-XXX

WASTE DISCHARGE REQUIREMENTS  
FOR  
STORMWATER MANAGEMENT/URBAN RUNOFF DISCHARGES  
WITHIN THE COUNTY OF LOS ANGELES

(NPDES NO. CAS0061654)

The California Regional Water Quality Control Board, Los Angeles Region, finds:

(The findings are currently being developed.)

This Order shall serve as a National Pollutant Discharge Elimination System (NPDES) Permit pursuant to Section 402 of the federal Clean Water Act, or amendments thereto, and shall take effect at the end of ten (10) days from the date of its adoption provided the Regional Administrator, USEPA, has no objections.

IT IS HEREBY ORDERED that the County of Los Angeles and the Cities of Agoura Hills, Alhambra, Arcadia, Artesia, Azusa, Baldwin Park, Bell, Bellflower, Bell Gardens, Beverly Hills, Bradbury, Burbank, Calabasas, Carson, Cerritos, Claremont, Commerce, Compton, Covina, Cudahy, Culver City, Diamond Bar, Downey, Duarte, El Monte, El Segundo, Gardena, Glendale, Glendora, Hawaiian Gardens, Hawthorne, Hermosa Beach, Hidden Hills, Huntington Park, Industry, Inglewood, Irwindale, La Cañada Flintridge, La Habra Heights, Lakewood, La Mirada, La Puente, La Verne, Lawndale, Lomita, Long Beach, Los Angeles, Lynwood, Malibu, Manhattan Beach, Maywood, Monrovia, Montebello, Monterey Park, Norwalk, Palos Verdes Estates, Paramount, Pasadena, Pico Rivera, Pomona, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, Rosemead, San Dimas, San Fernando, San Gabriel, San Marino, Santa Clarita, Santa Fe Springs, Santa Monica, Sierra Madre, Signal Hill, South El Monte, South Gate, South Pasadena, Temple City, Torrance, Vernon, Walnut, West Covina, West Hollywood, Westlake Village, and Whittier, in order to meet the provisions contained in Division 7 of the California Water Code, and regulations adopted thereunder, and the provisions of the Federal Clean Water Act, and regulations and guidelines adopted thereunder, shall comply with the following for the areas under their jurisdictions within the drainage area of the County of Los Angeles:

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September 15, 1995

A. Discharge Prohibitions

(Currently under discussion with the negotiation team.)

B. Receiving Water Limitations

(Currently under discussion with the negotiation team.)

C. Provisions

- i. The Dischargers shall comply with Discharge Prohibitions (above), and Receiving Water Limitations (above), through the timely implementation of control measures and other actions to reduce pollutants in the discharge as proposed in this Order.

I. **PROGRAM MANAGEMENT**

A. Principal Permittee

1. The County of Los Angeles is designated as the Principal Permittee.
2. The Principal Permittee shall:
  - a. Coordinate permit activities and, by \_\_\_\_\_, convene and chair the area-wide Executive Advisory Committee and the Watershed Management Committees;
  - b. Provide personnel and fiscal resources and by \_\_\_\_\_, develop a Baseline Stormwater Management Plan (Plan) for use in developing a watershed management plan (WMP) for each watershed;
  - c. Provide personnel and fiscal resources for the development of the WMPs;
  - d. Provide personnel and fiscal resources for the updating and modification of the Plan and the WMPs;
  - e. Provide technical and administrative support for both the Executive Advisory and Watershed Management Committees;
  - f. Implement watershed water quality monitoring programs;
  - g. Provide the personnel and fiscal resources to complete by \_\_\_\_\_, the annual reports including evaluations of monitoring program data and BMP effectiveness;
  - h. Coordinate the implementation of stormwater quality management

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activities of regional significance (this shall mean that the Principal Permittee shall identify BMPs which are applicable for implementation by permittees watershed-wide and area-wide), such as public outreach and education, pollution prevention, waste minimization, and other similar actions;

- i. Act as liaison between all Permittees and the Regional Board on Permit issues; and
- j. Meet all the responsibilities outlined below for a Permittee.

B. Permittees

- 1. The other cities and agencies are designated as Permittees.
- 2. Each Permittee shall:
  - a. Participate in the development and amendment of the Baseline Stormwater Management Plan (Plan) and by \_\_\_\_\_, jointly prepare the watershed specific management plans (WMPs) via their WMC;
  - b. Provide an Implementation Plan describing specific stormwater programs, projects and/or activities which are to be conducted within their jurisdictional boundaries, including the storm drainage system they own and operate, and which demonstrate compliance with the WMP(s) requirements by \_\_\_\_\_; and
  - c. Provide in a timely manner all information needed by the Principal Permittee for completing the annual reports.
- 3. The City Administrator/Public Works Director of each Permittee shall appoint a representative(s) to the WMC.

C. Agency Coordination

Each Permittee shall coordinate implementation of permit requirements and pollution prevention activities among each Permittee's internal departments and agencies (i.e. public works, planning, utilities, water supply, etc...).

D. Executive Advisory Committee

- 1. The EAC shall consist of a representative of the County of Los Angeles, City of Los Angeles, a representative from the Malibu Creek, Santa Clara, and Dominguez Channel Watershed Management Areas, and two representatives from each of the San Gabriel River, Los Angeles River, and the Ballona Creek Watershed Management Areas.
  - a. One representative from the EAC shall chair the Watershed

Management Committee for that Permittee's main watershed management area.

2. The City Administrator/Public Works Director for the County of Los Angeles and for the City of Los Angeles shall each appoint a representative to the EAC. Other members will be appointed by the WMCs.
3. The EAC shall be responsible for:
  - a. Making recommendations on area-wide issues to each of the Watershed Management Committees;
  - b. Assisting the Principal Permittee in the development of the Baseline Storm Water Management Plan; and
  - c. Reviewing the Watershed Management Plans as developed by each Watershed Management Committee and provide direction and guidance on the plans for consideration by the Watershed Management Committees;
  - d. Preparing and forwarding unified submittals to the Regional Board upon receipt of information and materials submitted by the Watershed Management Committee in compliance with Permit requirements;
  - e. Mediating conflict among the Permittees; and
  - f. Coordinating the implementation of pilot projects to target pollutant sources, evaluate BMP appropriateness, and assess effectiveness.

E. Watershed Management Committee

1. Watershed Management Committees (WMC) shall consist of a representative of each of the Permittees for that particular watershed management area. Regular WMC meetings shall be open to attendance by the public. The WMC may hold closed sessions, at its discretion, to discuss permit related issues.
2. The Malibu Creek, Santa Clara, and Dominguez Channel WMCs shall each appoint one representative to serve on the EAC and to chair the WMC. The San Gabriel River, Los Angeles River, and the Ballona Creek WMCs shall each appoint two representative to serve on the EAC, one of whom will chair the WMC.
3. The WMC shall be responsible for:
  - a. Establishing goals and objectives for the watershed;

- b. Prioritizing pollution control efforts;
- c. Participating in the development of a specific watershed management plan (WMP), based on the Baseline Stormwater Management Plan (Plan);
- d. Assessing the effectiveness of, preparing revisions for and making appropriate changes to the Plan and the WMP;
- e. Coordinating and facilitating the preparation of the annual reports on Permit activities within the watershed for submittal to the Regional Board -- a draft of the annual report shall be circulated to each Permittee and the Executive Advisory Committee for their review and comments prior to submittal to the Regional Board; and
- f. Facilitating the implementation of this Order among the Permittees in the watershed.

F. Watershed Management Subcommittees

- 1. Subcommittees will be established where needed as determined by the WMC and/or the EAC.
- 2. The Subcommittees will be focused on specific program areas and can provide more specific oversight on the development, implementation, and evaluation of selected program areas.

G. Fiscal Resources

Each Permittee shall submit an annual budget for its Implementation Plan within 30 days after the budget adoption. The budget shall be summarized and put into a format which identifies the necessary capital and operation and maintenance expenditures necessary to implement the storm water management program. The budget shall provide information such as funding sources, staff resources, equipment, support capabilities, contract services, and cost sharing arrangements for the storm water management programs. Also included shall be a description of any funding shortfalls.

- 1. Area-Wide Resources - In implementing this Order and the Plan, the Permittees may elect to jointly fund a single program for certain BMPs, such as Public Education, that are area-wide in nature. Funding agreements, including budgets and cost per agency, shall be developed.
- 2. City-Specific Resources - As stated above, each Permittee shall develop an annual budget detailing the cost of implementing Permit-related activities within its jurisdiction.

H. Legal Authority

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1. The legal authority that was required of each Permittee under Order No. 90-079 shall continue in effect.
2. The Co-Permittees shall exercise their legal authority and require compliance with this Order and the Plan within its jurisdiction.
3. Each Permittee shall certify that it has legal authority to control discharges to and from those portions of the storm drainage system over which it has jurisdiction. This legal authority may be a combination of statute, ordinance, permit, contract, order or inter-jurisdictional agreements between permittees with adequate existing legal authority and shall, at a minimum, accomplish Items a-f below:
  - a. Control the contribution of pollutants to the storm drainage system by storm water discharges associate with industrial activity and the quality of storm water discharged from sites of industrial activity;
  - b. Prohibit illicit discharges and illicit connections to the storm drainage system and require removal of illicit connections;
  - c. Control the discharge of spills and the dumping or disposal of materials other than storm water (e.g. industrial and commercial wastes, trash, debris, motor vehicle fluids, green waste, animal wastes, leaves, dirt, or other landscape debris etc.) to the storm drainage system;
  - d. Control through interagency or inter-jurisdictional agreements among permittees the contribution of pollutants from one portion of the storm drainage system to another;
  - e. Require compliance with conditions in ordinances, permits, contracts or orders; and
  - f. Carry out all inspection, surveillance and monitoring procedures necessary to determine compliance and noncompliance with permit conditions including the prohibition on illicit discharges to the storm drainage system.
4. Each Permittee's legal counsel shall complete a review of its existing legal authority to ensure that its existing legal authority complies with the requirements in this Order.
5. Upon its completion of the legal authority review, or within 60 days of permit adoption, (whichever is sooner) each Permittee shall demonstrate that it has adequate legal authority or provide a schedule for obtaining the adequate legal authority. Guidance for demonstrating adequate legal authority is included within the EPA document entitled *Guidance Manual For The Preparation Of Part 2 Of The NPDES Permit Applications For Discharges from Municipal Separate Storm Sewer Systems, (EPA 833-B-*

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I. Administrative Review

The administrative review process formalizes the procedure for review and acceptance of reports and documents submitted to the RWQCB under this Permit. In addition, it provides a method to resolve any differences in compliance expectations between the Regional Board and Permittees, prior to initiating enforcement actions.

1. If the Executive Officer finds that a Permittee's stormwater program is insufficient to meet the provisions of the Permit, the Executive Officer shall send a "Notice of Intent to Meet and Confer (NIMC)" to the Permittee. The NIMC shall include a date by which the Permittee must meet with RWQCB staff.
2. Upon receipt of a NIMC, the Permittee shall meet and confer with RWQCB staff to clarify the steps to be taken to completely meet the provisions of this permit. The meet and confer sessions shall be for the purpose of developing additions and enhancements to the jurisdiction's stormwater program. The meet and confer period shall conclude with the submittal to and acceptance by the Executive Officer of a written "Stormwater Program Compliance Amendment (SPCA)" which shall include implementation deadlines. The Executive Officer may terminate the meet and confer period after a reasonable period due to a lack of progress on issues and may order submittal of the SPEP by a specified date. Failure to submit an acceptable SPCA by the specified date shall constitute a violation of the Permit.
3. The Executive Officer will approve or reject the submitted SPCA within a reasonable amount of time. Rejection of a submitted SPEP by the Executive Officer shall state the reasons for the failure to approve the SPCA. A Permittee that receives a rejection of an SPCA shall have thirty (30) days to remedy the specified deficiency in the SPCA and receive administrative approval from the Executive Officer of the amended SPCA.
4. The Permittee shall comply with the terms of the SPCA. The Permittee shall submit reports to the Executive Officer of progress made under the SPCA. The frequency of progress report submittal shall be as prescribed by the Executive Officer. Failure to comply with the terms and conditions of the SPCA shall constitute a violation of the Permit and shall be cause for immediate Administrative Civil Liability as prescribed by the Executive Officer.

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September 14, 1995

## II. ILLICIT DISCHARGES\DISPOSAL

### A. Illicit Connections

By \_\_\_\_\_, the EAC shall develop a consistent program including investigative standard procedures to eliminate illicit connections to the storm drain system.

By \_\_\_\_\_, each Permittee shall implement a program to identify and eliminate illicit connections to the maximum extent practicable.

1. The program shall, at a minimum:
  - a. standardize per EAC guidelines, storm drain inspection procedures, and illicit connection and identification and elimination procedures;
  - b. prioritize major problem areas, to include but not be limited to older business areas, and areas with heavy industry such as those listed under subchapter N of 40 CFR Parts 405 - 471
  - c. utilize results of field screening activities, and other appropriate information.
  - d. contain an industrial/commercial education/outreach component to inform businesses about the problem of illicit discharges/dumping and proper discharge/disposal practices,
  - e. schedule storm drains for inspection for illicit connections within its jurisdiction.
  - f. maintain a standardized record keeping system to document illicit discharges/disposal in their jurisdiction;
  - g. establish enforcement procedures to terminate illicit connections.

### B. Illegal Discharges\Disposal

1. By \_\_\_\_\_, the EAC shall develop a consistent program including investigative standard procedures to eliminate illegal discharges/disposal practices to the storm drain system.
2. By \_\_\_\_\_, the EAC shall develop a standard enforcement procedures, including administrative and judicial, to eliminate illegal discharges/disposal practices.
3. By \_\_\_\_\_, the EAC shall develop standard procedures for spill response, including a procedure to ensure that, in a spill response, sewage treated

with disinfection agents will not be discharged into the storm drainage system, to the maximum extent practicable. The standard procedures will address investigation, containment, and cleanup activities as appropriate.

- 4. By \_\_\_\_\_, each Permittee shall implement a program to identify and eliminate illegal discharges/disposal practices to the maximum extent practicable.

The program shall, at a minimum:

- a. Identify and prioritize problem areas of illegal disposal where inspection, clean up, and enforcement are necessary to prevent the discharge of contaminants;
- b. Maintain a surveillance program to detect illegal discharges and disposal into the street system, including, but not be limited to, street use inspections and inspections of vacant facilities;
- c. Establish procedures to educate inspectors, maintenance workers, and other field staff in their jurisdiction to notice illicit dischargers/disposal practices during the course of their daily activities, and report such occurrences;
- d. Maintain a standardized record keeping system to document illicit discharges/disposal in their jurisdiction;
- e. Establish per EAC guidelines spill response procedures; and
- f. Establish, per EAC guidelines, enforcement procedures to eliminate illegal discharges/disposal practices.

C. Non-Storm Water Discharges

- 1. Exempted Discharges

(Currently under discussion with the negotiation team.)

- 2. Conditionally Exempted Discharges

(Currently under discussion with the negotiation team.)

D. Other Prohibited Activities

- 1. The Permittees shall prohibit any person from:
  - a. causing or allowing illicit discharges to be made into the storm drain system;
  - b. establishing, using or maintaining an illicit connection to the storm

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drain system;

- c. littering.
- d. disposing of leaves, dirt or other landscape debris into a storm drain; and
- e. using any pesticide, fungicide, or herbicide which has either been voluntarily discontinued or prohibited by the USEPA.
- f. washing down toxic materials from paved or unpaved areas.
- g. washing down impervious surfaces in industrial and/or commercial areas is prohibited unless specifically required to under Health and Safety Codes.

2. Storage of Materials, Machinery and Equipment

The Permittees shall require:

- a. that objects, such as motor vehicle parts, containing grease, oil, or other hazardous substances, and unsealed receptacles containing hazardous materials, be stored away from areas susceptible to runoff;
- b. that machinery or equipment which is to be repaired or maintained in areas susceptible to runoff, be placed on a pad of absorbent material, or an equivalent, to contain leaks, spills or small discharges;
- c. that owners of commercial/industrial motor vehicle parking lots and structures located in areas susceptible to runoff to be swept to remove debris. Lots with more than ten (10) parking spaces and all public parking facilities shall also be vacuum swept, or by equivalent method, to remove chemical residue;
- d. that all fuel and chemical residue, animal waste, garbage, batteries, or other types of potentially harmful materials which are located in areas susceptible to runoff, be removed immediately and disposed of properly.
- e. that hazardous waste be disposed of through the Permittee's hazardous waste program or at any other appropriate disposal site, and not be placed in a trash container for regular trash disposal.

E. Public Reporting

- 1. By \_\_\_\_\_, the EAC shall develop a standard program, for Permittees to implement by \_\_\_\_\_, to promote, publicize, and facilitate public

reporting of illicit discharges and illegal disposal practices that may adversely impact water quality.

2. By \_\_\_\_\_, EAC shall develop a standard program for the reporting of incidents of a hazardous substance entering the storm drain, where the responsible party is not known, to the Regional Board and State of California Office of Emergency Services (OES) at (800)\_\_\_\_-\_\_\_\_ and the Federal Hazardous Response Number at (800) \_\_\_\_-\_\_\_\_. The Permittees shall implement this program by \_\_\_\_\_.

F. Reporting

1. A quarterly summary of illicit connections eliminated shall be submitted with the Annual Report to the Regional Board. The summary shall include: a brief description of the investigation; what was being discharged; estimated length of time the practice was on-going; what remedial action was taken; and what happened to the discharger.
2. A quarterly summary illegal discharge/disposal practices reported through the standardized public reporting system shall be submitted with the Annual Report to the Regional Board. The summary shall include: a brief description of the incident; what was spilled/dumped; quantity; what remedial action was taken; and what happened to the discharger/dumper.

G. Coordination With State Permits

1. The Principal Permittee will be provided an updated list of NPDES Permits on a quarterly basis, through the Regional Board's electronic bulletin board, to verify permitted sources of the existing non-storm water discharges in the storm water drainage system.
2. The Permittees will work with other regulatory agencies and report to the Regional Board on recommendations to resolve any conflicts which are identified between the provisions of this permit and the requirements of other regulatory agencies. These agencies, include but are not limited to:
  - a. California Department of Fish and Game
  - b. California Department of Toxic Substances Control
  - c. California Coastal Commission
  - d. United States Environmental Protection Agency
  - e. California Department of Transportation
  - f. California Air Resources Board

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September 14, 1995

### III. PROGRAM REQUIREMENTS FOR INDUSTRIAL/COMMERCIAL SOURCES

#### A. Identification of Sources

1. By \_\_\_\_\_, the Permittees shall develop a database listing industrial/commercial facilities by four digit SIC codes which shall be updated annually. The database shall include at a minimum:
  - a. Facility owner's name, address, and telephone number;
  - b. Site address, telephone number, and contact person;
  - c. Closest receiving water and watershed;
  - d. Applicable SIC code(s);
    - i. For each four digit SIC sector, the Permittees shall identify primary activities that might impact runoff discharges;
    - ii. For each four digit SIC sector, the Permittees shall identify primary materials that might impact runoff discharges; and
2. By \_\_\_\_\_, the EAC shall develop a pollutant source identification program for the control of storm water pollutant discharges from industrial/commercial facilities. The objective of the source identification program is to gather data on specific and/or interrelated set of pollutant generating activities occurring on very small areas (< 5 acres) of industrial/commercial activity and to provide information for developing and implementing BMPs for specific activities.

#### B. Prioritization of Sources

1. By \_\_\_\_\_, the Permittees shall prioritize industrial and commercial facilities within their jurisdiction on their relative potential for the contamination of storm water and urban runoff. The prioritized list shall include
  - a. Categorical List
    - i. All industries regulated under Phase I of the Federal storm water program (40 CFR 122.26).
    - ii. All industrial/commercial SIC codes selected by the USEPA for screening under Phase II of the Federal storm water program.
    - iii. Other business sectors considered by the EAC or the

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Regional Board to conduct industrial/commercial activity with a high potential for storm water contamination (e.g. restaurants).

The categorical list shall be grouped by Permittees and provide an organized overview of the target facilities based on land use, operation, and activities, could potentially contribute significant amounts of pollutants into storm water runoff.

2. By \_\_\_\_\_, Permittees shall rank the industrial and commercial facilities, identified as potential pollutant sources of storm water and urban runoff pollutants in III. B.1.a, in order of priority for oversight of implementation of storm water management measures.

C. Source Control Measures

1. By \_\_\_\_\_, Permittees shall develop a checklist of specific storm water and urban runoff control measures for industrial and commercial facilities which have been prioritized as having the potential to contribute significant amounts of pollutants into storm water runoff. The control measures must
  - a. address multiple pollutant sources
  - b. initially focus on source control measures such as source minimization, education, good housekeeping, and site design alternatives.
  - c. target industrial/commercial source areas and activities with the potential to generate substantial pollutant loadings
2. By \_\_\_\_\_, Permittees shall develop a process to ensure implementation of storm water and urban runoff control measures for industrial/commercial facilities identified in III.C.1.
3. By \_\_\_\_\_, Permittees shall submit an evaluation of specific structural storm water and urban runoff control measures such as, oil/water separators, infiltration, detention, biofilters, etc., for industrial and commercial facilities which have been prioritized as having the potential to contribute significant amounts of pollutants into storm water runoff. The structural control measures must be evaluated as to
  - a. effectiveness in reducing toxic pollutants and pollutants of concern
  - b. ease of maintenance
  - c. current frequency of use
  - d. feasibility and cost-effectiveness

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e. possible methods to ensure implementation if necessary

By \_\_\_\_\_, the Permittees shall, in addition, describe any studies and pilot projects they intend to conduct to assess the feasibility and effectiveness of specific control measures.

4. By \_\_\_\_\_, Permittees shall require the following:

- a. The proper disposal of food wastes by restaurants and food wholesalers.
- b. Persons owning or operating a gas station, auto repair garage, or similar structure must clean those facilities in a manner that does not result in discharge of pollutants to the storm drain system; and
- c. Machinery and equipment, including motor vehicles, which are visibly leaking oil, fluid or antifreeze must be repaired.

5. The EAC may seek coverage under this Order, for industrial facilities listed in III.B.1.a.1 which are owned and operated by Permittees if it,

- a. establishes a procedure for notifying the Regional Board of industrial sites owned and operated by Permittees
- b. prepares a checklist of industrial BMPs using BAT/BCT criteria for implementation by Permittees at these industrial sites
- c. standardizes procedures to ensure implementation of industrial BMPs by Permittees,
- d. requires Permittees to prepare and retain site specific Storm Water Pollution Prevention Plans at Permittee industrial facilities
- e. establishes a procedure for Permittees to report annually on the effectiveness of Storm Water Pollution Plans at each site, and certify compliance with this Order.

D. Source Inspection

1. By \_\_\_\_\_, Permittees shall submit a schedule for inspection of industrial/commercial facilities in III.B.1.a. for adequacy of storm water pollution prevention measures. The schedule shall include, for a five year period,

- a. for municipalities with a population of less than 250,000, all facilities identified in III.B.1.a.1, and all facilities identified in III.B.1.a.2 and III. B.1.a.3,

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- b. for municipalities with a population of greater than 250,000, all facilities identified in III.B.1.a.1, and, a subset of facilities identified in III.B.1.a.2 and III.B.1.a.3 but not less than ten times the number identified in III.B.1.a.1

Industrial/commercial facilities in III.B.1.a.2 and III.B.1.a.3 that are not included in the inspection schedule shall be surveyed by phone, mail-out, or a similar method, as to their conformance with good stormwater quality management measures.

- 2. By \_\_\_\_\_, Permittees shall develop and implement a industrial/commercial facilities inspection program. The inspection program shall include, but is not limited to:
  - a. procedures for facility inspections
  - b. procedures for industrial/commercial sectors outreach on pollution prevention, waste minimization, and storm water quality management
  - c. procedures to ensure corrective action is undertaken by non-complying facilities
  - d. procedures to follow-up on violations of municipal standards
  - e. procedures for enforcement action against non-complying facilities;
  - f. an electronic recording system to document the status of facility inspections; and,
  - g. appropriate training for program staff.
- 3. During inspection of group III.B.1.a.1, inspectors shall request to see a copy of the SWPPP during an inspection. If no SWPPP is available, the Regional Board shall be notified. In addition, the Permittee may deem it necessary to report problematic facilities to the Regional Board.

E. **Reporting**

Each year, the Permittees shall evaluate the results and progress of their storm water quality management program for industrial/commercial sources. The annual report submitted to the Regional Board shall recommend a strategy for the management of storm water from industrial/commercial sources for the following year based upon:

- a. priority industrial/commercial sources listing
- b. priority on-site inspections
- c. phone/mail-out survey inspections
- d. priority checklists of stormwater urban runoff control measures



- e. evaluations of structural and treatment control measures
- f. special studies and pilot projects needs
- g. specific site and activity monitoring needs

The EAC shall make available to the Regional Board the industrial/commercial database developed in III.B.1.a.1 in the appropriate format when so requested.

F. Coordination

The Permittees shall develop a process for the exchange of information between the Permittees and the Regional Board. Appropriate formats for such reports shall be developed as required.

G. Conflicts with Other Mandates

1. The Permittees will work with other regulatory agencies and report to the Regional Board on recommendations to resolve any conflicts which are identified between the provisions of this permit and the requirements of other regulatory agencies.

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#### IV. PROGRAM REQUIREMENTS FOR NEW DEVELOPMENT AND REDEVELOPMENT

##### A. Regional Policy

1. By \_\_\_\_\_, the EAC shall develop and adopt a regional policy to promote watershed protection considerations during planning, project review, and permitting of new development and redevelopment, to:
  - a. preserve to the extent feasible, and where possible, create or restore areas that provide water quality benefits, such as riparian corridors and wetlands, and promote the design of new development so that it protects the natural integrity of drainage systems and water bodies.
  - b. avoid conversions of areas particularly susceptible to erosion or sediment loss and/or establish development guidance that identifies these areas and protects them from erosion and sediment loss. Such areas include steep slopes, highly erodible soils, periods of intense rainfall, and inability to revegetate once disturbed.
  - c. require the integration of storm water quality protection into construction and post-construction activities at all development sites, including the minimization of toxic material use and their careful containment on site.
  - d. maintain peak runoff rates at pre-development levels, wherever practicable.
2. By \_\_\_\_\_, the EAC shall establish minimum requirements consistent with the regional policy for new development and redevelopment, for
  - a. site planning practices
  - b. construction best management practices
  - c. post-construction best management practices
  - d. reporting erosion and storm water control strategies
  - e. redevelopment and infill

##### B. Planning Process

In order to integrate storm water management considerations into new development projects at the time that they are first proposed to jurisdictions, and to support other provisions of this permit:

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1. By \_\_\_\_\_, the EAC shall develop guidance for permittees to use in preparing/reviewing EIRs, and in linking EIR mitigation conditions to local permits approvals.
2. By \_\_\_\_\_, permittees shall adopt and use the guidance in their internal procedures.
3. By \_\_\_\_\_, the EAC shall develop a model CEQA checklist form that explicitly addresses watershed, water quality, and nonpoint source pollution impacts.
4. By \_\_\_\_\_, the permittees shall use the model CEQA checklist.
5. Whenever a permittee rewrites either of the following mandated general plan elements - the conservation element or the open space element - watershed and stormwater management/urban runoff considerations shall be incorporated.
6. By \_\_\_\_\_, permittees shall implement a program to encourage developers to maximize pervious areas and storm water infiltration (in areas where the geology and topography allow), minimize directly connected imperious areas, and include justifiable treatment control measures.
7. Permittees shall require that prior to the submittal of an application for the first planning or building approval for a new development project, an applicant shall submit an Urban Runoff Mitigation Plan.
  - a. The Urban Runoff Mitigation Plan shall:
    - i. Be designed to reduce the runoff volume from the site and the pollutant load contributed by the site through incorporation of design elements and practices that address each of the goals set forth below in subsection (c). (Applicants should refer to the most recent edition of the Construction Best Management Practices Handbook, produced and published by the Storm Water Quality Task Force, for specific guidance on selecting best management practices for reducing pollutants in stormwater discharges from urbanized areas.)
    - ii. Discuss compliance with the development requirements set forth by Permittee's legal authority; and
    - iii. Address the following goals in connection with both construction and long term operation of the site:
      - a. Maximize, to the extent practicable, the percentage of permeable surfaces in order to allow more percolation of runoff into the ground.

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- b. Minimize, to the extent practicable, the amount of runoff directed to impermeable areas to the City's stormwater system.
- c. Maximize, to the extent practicable, stormwater filtration and storage for reuse through the use of sediment traps, cisterns or other means.
- d. Minimize, to the extent practicable, parking lot pollution through the use of porous materials to allow percolation of runoff, through the installation of appropriate treatment controls, or through other means.
- iv. Compliance with an approval Urban Runoff Mitigation Plan shall be a condition of any required planning approval.
- v. Failure to comply with an approved Urban Runoff Mitigation Plan after receiving any required planning approval shall be a misdemeanor.

C. Identification of Sources

- 1. By \_\_\_\_\_, the EAC shall establish a screening criteria for construction sites to be listed in a database.
- 2. By \_\_\_\_\_, the Permittees shall develop a database listing sites of construction activity within each Permittees' jurisdiction which shall be updated quarterly. The database shall include at a minimum:
  - a. Facility owner's name, address, and telephone number;
  - b. Site address, telephone number, and contact person;
  - c. Closest receiving water;
  - d. Type of construction activity
  - e. Duration of project with start and end dates
  - f. Total size of project in acres or square feet .

D. Prioritization of Sources

- 1. By \_\_\_\_\_, the Permittees shall prioritize sites of construction activity within their jurisdiction on their relative potential for the contamination of storm water and urban runoff. The categorical list shall include:
  - a. All construction activity sites regulated under Phase I of the

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Federal storm water program (40 CFR 122.26).

- b. All construction activity with sites greater than the size criteria established by the EAC but less than five acres in size.
  - c. Other construction activity sites considered by the EAC or the Regional Board to have a high potential for the contamination of storm water and urban runoff.
2. By \_\_\_\_\_, Permittees shall rank the construction activity sites, identified as potential pollutant sources of storm water and urban runoff pollutants in IV. B.1.a, in order of priority for oversight of implementation of storm water management measures.

E. Control Measures

1. By \_\_\_\_\_, Permittees shall develop a checklist of specific storm water and urban runoff control measures for construction activity sites in IV. B.1.a. The control measures must
- a. address multiple pollutant sources
  - b. initially focus on source control measures such as source minimization, education, good housekeeping, good waste management and good site planning.
  - c. target construction activity source areas and activities with the potential to generate substantial pollutant loadings
2. By \_\_\_\_\_, Permittees shall submit an evaluation of specific structural storm water and urban runoff control measures such as, oil/water separators, infiltration, detention, biofilters, etc., for construction sites in IV.B.1.a. The structural control measures must be evaluated as to:
- a. effectiveness in reducing sediment, toxic pollutants and pollutants of concern;
  - b. ease of maintenance;
  - c. current frequency of use;
  - d. feasibility and cost-effectiveness; and
  - e. possible methods to ensure implementation.
- By \_\_\_\_\_, Permittees shall describe any studies and pilot projects that may be conducted to assess the feasibility and effectiveness of specific control measures.

3. By \_\_\_\_\_ Permittees shall have in place a process to ensure implementation and proper maintenance of storm water and urban runoff control measures for sites associated with construction activity in IV.B.1.a., including
- a. use of qualified personnel to design, install, and maintain BMPs.
  - b. proper maintenance of BMPs incorporated into private developments (e.g., through deed restrictions, covenants, conditions and restrictions (CC&R).
  - c. proper installation and maintenance of post-construction BMPs.
  - d. prohibition on grading during the wet season (Oct 15 -Apr 15) except for emergency action unless adequate erosion and sediment control measures are in place and maintained.
4. Permittees shall require the following for demolition/construction activity:
- a. Sediment, construction waste and other pollutants from construction sites and parking areas shall be retained on the site to the maximum extent practicable.
  - b. Any sediments or other materials which are not retained on the site shall be removed within 24 hours or where determined necessary by the Director of Department of Public Works, or a designated representative, a temporary sediment barrier shall be installed.
  - c. Excavated soil shall be located on the site in a manner that eliminates the amount of sediments running into the street or adjoining properties. Soil piles shall be covered until the soil is either used or removed.
  - d. Drainage controls shall be utilized as needed, depending on the extent of proposed grading and topography of the site, including but not limited to the following:
    - i. Detention ponds, sediment ponds, or infiltration pits.
    - ii. Dikes, filter beams or ditches.
    - iii. Downdrains, chutes or flumes.
    - iv. Silt fences.
  - e. No washing of construction or other industrial vehicles shall be allowed adjacent to a construction site. No water from washing vehicles on a site is allowed to run off into the City's storm drain system.

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- f. Roof drainage shall be oriented towards permeable areas on site to maximum extent practicable.
  - g. Lot drainage shall be oriented towards permeable areas to the maximum extent practicable.
  - h. All parking lots shall be designed to contain one inch of precipitation in a 24 hour period.
  - i. Runoff from parking lots shall be directed to permeable areas to the Maximum Extent Practicable.
5. Permittees shall require the following for construction activity:
- a. All construction sites in hillside areas or in areas adjacent to natural water-ways (soft bottom creeks), lakes or the ocean must develop and implement sedimentation and erosion control plans that incorporate the following elements: timing of construction, BMPs to reduce erosion of cleared hillsides (revegetation, jute netting, etc.), BMPs to reduce the velocity of runoff and sediment from the construction site, and BMPs to detain the flow of sediments from the site;
  - b. As a condition of granting a construction permit, set forth reasonable limits on the clearing of vegetation from construction sites, including, but not limited to, regulating the length of time during which soil may be bare, and, in certain sensitive cases, prohibiting bare soil.
6. The EAC may seek coverage under this Order, for construction activity sites listed in III.B.1.a.1 which are owned and operated by Permittees if it:
- a. establishes a procedure for notifying the Regional Board of construction activity on sites owned or operated by Permittees;
  - b. prepares a checklist of construction BMPs using BAT/BCT criteria for implementation by Permittees at these construction sites;
  - c. standardizes procedures to ensure implementation of construction BMPs by Permittees;
  - d. requires Permittees to prepare and retain site specific Storm Water Pollution Prevention Plans at Permittee construction sites; and
  - e. establishes a procedure for Permittees to report annually on the effectiveness of Storm Water Pollution Plans at each construction site, and certify compliance with this Order.

F. Source Inspection

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1. By \_\_\_\_\_, Permittees shall submit a schedule for inspection of construction activity sites in IV.B.1.a. for adequacy of storm water pollution prevention measures and erosion control measures. The schedule shall include, for a five year period,
  - a. all construction activity identified in IV.B.1.a.1, and all construction activity identified in III.B.1.a.2 and III. B.1.a.3,
2. By \_\_\_\_\_, Permittees shall develop and implement a construction activity inspection program. The inspection program shall include, but is not limited to:
  - a. procedures for construction site inspections
  - b. procedures for construction and building industry outreach on pollution prevention, waste minimization, and storm water quality management
  - c. procedures to ensure corrective action is undertaken by non-complying sites
  - d. procedures to follow-up on violations of municipal codes
  - e. procedures for enforcement action against non-complying construction activity;
  - f. an electronic recording system to document the status of construction activity inspections; and,
  - g. appropriate training for program staff.
3. During inspection of group IV.B.1.a.1 sites, inspectors shall request to see a copy of the SWPPP during an inspection. If no SWPPP is available, the Regional Board shall be notified. In addition, the Permittee may deem it necessary to report problematic construction sites to the Regional Board.

G. Reporting

1. Each year, the Permittees shall evaluate the results and progress of their storm water quality management program for construction activity sites. The annual report submitted to the Regional Board shall recommend a strategy for the management of storm water from construction activity sites for the following year based on
  - a. priority construction site sources listing
  - b. priority site inspections
  - c. priority checklists of stormwater urban runoff control measures
  - d. evaluations of structural and treatment control measures
  - e. special studies and pilot projects needs



- f. specific site and activity monitoring needs
- 2. The EAC shall make available to the Regional Board the construction activity database developed in IV.B.1.a.1 in the appropriate format when so requested.

H. Conflicts with Other Mandates

- 1. The Permittees shall work with other regulatory agencies and report to the Regional Board on recommendations to resolve any conflicts which are identified between the provisions of this permit and the requirements of other regulatory agencies.

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**V. PUBLIC AGENCY REQUIREMENTS**

**A. Examination of Existing Activities**

By \_\_\_\_\_, the Permittees shall develop and begin implementation of a program to examine their existing activities and measures described below to reduce the impact on stormwater quality from their operations.

**B. Sewage Systems**

1. All reasonable efforts shall be undertaken to keep sewage spills or leaks from entering the storm drain system. The EAC shall develop procedures for spill response by \_\_\_\_\_.
2. Control procedures for identifying, repairing, and remediating sewer blockages, exfiltration, overflow, and wet weather overflows from the sewers to the storm drain system shall be implemented to protect stormwater quality by \_\_\_\_\_. These procedures shall include, but are not limited to, quick field response to overflows, follow-up testing, and complaint investigation.
3. By \_\_\_\_\_, the Permittees shall insure that field personnel who operate and/or maintain sewer systems have procedural training for field screening, sampling, smoke/dye testing, and TV inspection, if appropriate, to be able to properly investigate any suspect connections or cross connections to the storm drain system.

**C. Vehicle Maintenance/Material Storage Facilities**

1. By \_\_\_\_\_, EAC will develop pollution prevention plans for each public vehicle maintenance/material storage facility category.. Public vehicle maintenance/material storage facilities include any Permittee-owned and/or operated facility in which any of the following occur: vehicle or equipment maintenance; repair; washing; fueling; and/or any facility at which there is storage of toxic chemicals or hazardous materials.
2. Best Management Practices (BMPs)
  - a. By \_\_\_\_\_, Permittees will have site specific pollutant control measures implemented at all vehicle maintenance/material storage facilities per EAC guidelines, together with an on- site pollution prevention plan.
  - b. Any BMPs to be implemented must be part of a comprehensive plan designed to address the various pollutant sources at each public vehicle maintenance/material storage facility. To achieve this goal, the Permittees shall first identify the potential pollution sources and who is responsible for implementing the stormwater

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management measures.

- c. Based on the facility type, management practices and schedule of implementation shall be developed. BMPs that can be used to improve the quality of runoff include, but are not limited to:
  - i. Housekeeping practices;
  - ii. Material storage control;
  - iii. Vehicle leak and spill control; and
  - iv. Illegal dumping control.
- d. Loading/Unloading of Materials
  - i. Employees or contractors of the Permittees who handle potentially harmful materials shall be trained in good housekeeping practices to prevent or reduce the discharge of pollutants to stormwater from outdoor loading/unloading of materials.
  - ii. Applicable BMPs shall be selected based on the following three factors:
    - 1. Eliminating exposure of material to rainfall;
    - 2. Checking equipment regularly for leaks; and
    - 3. Containing spills.
- e. Material Storage Control

A program shall be developed to prevent or reduce the discharge of pollutants to stormwater from outdoor container storage areas using measures such as:

  - i. Installing safeguards against accidental releases;
  - ii. Secondary containment;
  - iii. Conducting regular inspections; and
  - iv. Training employees in standard operating procedures and spill cleanup techniques.
- f. Vehicle and Equipment Washing and Maintenance
  - i. Washing of vehicles or equipment on-site shall be

performed in a designated area equipped with an oil/water separator.

- ii. The sumps and separators shall be maintained/cleaned on a regularly scheduled basis appropriate to the facility.
- iii. BMPs to be implemented as appropriate for vehicle and equipment maintenance shall include but not be limited to:
  - a. Waste reduction;
  - b. Use of alternate products;
  - c. Pollution prevention;
  - d. Recycling; and
  - e. Spill prevention and clean up.

6. Waste Handling and Disposal

Wastes shall be managed to prevent stormwater pollution.

D. Parks and Recreation

1. Fertilizers/Pesticides

- a. Permittees shall develop procedures on the proper application of pesticides, herbicides, and fertilizers by \_\_\_\_\_. Procedures shall include:
  - i. List of approved pesticides and selected use;
  - ii. Product and application information;
  - iii. Equipment use and maintenance procedures; and
  - iv. Record keeping.
- b. Landscape waste shall not be discharged into the storm drain system.
- c. Storage areas for fertilizers and pesticides shall be designed and maintained to reduce exposure to stormwater. The following BMPs shall be utilized where appropriate:
  - i. Store materials inside or under cover on paved surfaces;
  - ii. Use secondary containment;

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- iii. Minimize storage and handling of hazardous materials;
- iv. Inspect storage areas regularly.

2. Facility Management

- a. Wash waters cannot be discharged into the storm drain system without appropriate treatment.
- b. Landscape maintenance involving the use of pesticides and fertilizers shall ensure the proper use of these materials to minimize loss to storm water.
- c. Retention and planting of native vegetation to reduce water, fertilizer, and pesticide needs shall be encouraged.
- d. Use of Integrated Pest Management (IPM) shall be encouraged.
- e. A schedule for irrigation and fertilization shall be developed by \_\_\_\_\_, to minimize:
  - i. Chemical application during wet season and no chemical application during storms; and,
  - ii. Over watering that may lead to runoff that contains nutrients and pesticides.
- f. The drainage of commercial/municipal swimming pool water shall only be discharged under separate Waste Discharge Requirements.
- g. Each Permittee shall develop BMPs to minimize trash, debris, and other pollutants from entering Permittee owned recreational water bodies by \_\_\_\_\_. These measures shall include:
  - i. Routine trash collection along, on, and/or in, water bodies, where feasible; and
  - ii. Public outreach to educate the public about impacts of illegal dumping.

E. Storm Drain System Operation and Management

1. Inlet Maintenance

BMPs to be implemented by each Permittee for effective catch basin cleaning shall include, but not be limited to the following:

- a. Basins shall be inspected and cleaned between May 1 and October 15 of each year;

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- b. Between October 15 and April 15, catch basins shall be maintained as necessary.
- c. Records shall be kept of the number of catch basins cleaned; and
- d. Track the amount of waste collected.

2. Storm Drain Maintenance

- a. Material removed from storm drains and catch basins shall be disposed of properly.
- b. Trash and debris from open channel storm drains shall be removed at least annually between May 1 and October 15 of each year.
- c. Open channels shall also be monitored during the rainy season for any debris buildup and cleaned where needed.

3. Waste Management

The Permittees shall implement a program by \_\_\_\_\_, to identify problem areas of illegal dumping so regular inspection and clean up can maintain the channel's optimum capacity and prevent the discharge of contaminants.

4. Dry weather storm drain diversion

The Permittees shall investigate the feasibility of diverting dry-weather flows from the storm drain system to POTWs where appropriate. The investigation shall be completed by \_\_\_\_\_.

F. Streets and Roads

- 1. Sweeping of curbed streets:
  - a. Sweeping of curbed streets shall occur at least monthly.
  - b. Where feasible, areas generating excessive refuse shall be swept more frequently.
- 2. Maintenance
  - a. Existing saw-cut management and paving practices conducted by the Permittees shall be evaluated and appropriate control measures developed.
  - b. Paving control measures to be considered that would help reduce the impacts to stormwater include, but are not limited to:
    - i. Avoid paving during wet weather; and

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- ii. Store materials away from drainage courses to prevent pollution of stormwater runoff.
- c. Refuse collected shall be transported to appropriate disposal facilities in accordance with applicable federal, state, and local laws and regulations.
- d. Good housekeeping practices shall be implemented to insure proper management of any waste products that may be generated during maintenance activities.
- e. To reduce stormwater pollution from concrete materials and wastes:
  - i. Washout of concrete trucks should be conducted off- or on-site in designated areas. Do not wash out concrete trucks into storm drains, open ditches, streets, or streams;
  - ii. Store materials under cover, away from drainage areas; and
  - iii. Avoid mixing excess amounts of concrete or cement on-site.
- f. Employees shall be trained in the implementation of good housekeeping measures. Training shall:
  - i. Promote a clear understanding of the potential for maintenance activities to pollute storm water;
  - ii. Identify solutions (BMPs selection);

G. Flood Control

- 1. By, \_\_\_\_\_, the Permittees shall develop and implement procedures to assess the impact(s) of new flood management projects on the quality of receiving water bodies.
- 2. The Permittees shall undertake pilot projects/studies to determine the applicability of altered structural flood control system elements to provide pollutant removal in stormwater.
- 3. During construction, appropriate BMPs shall be utilized to control pollutants.
- 4. Current maintenance activities with regards to desilting/sediment removal, vegetation management, and waste management shall be reviewed to assure that appropriate management measures are developed to comply with the stormwater regulations.

H. Parking Facilities

By \_\_\_\_\_, each Permittee shall develop a program to implement periodic hardscape and catch basin cleaning, in order to reduce concentrations of oil, grease, suspended particulates, and metals, as well as the petroleum byproducts.

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September 15, 1995 (To be negotiated)

## VI. PUBLIC INFORMATION AND PARTICIPATION

To reach as many Los Angeles County residents as possible, a comprehensive educational outreach approach shall be undertaken under this permit. Each Permittee shall choose an appropriate combination of outreach tools and activities to raise public awareness of storm water issues and improve water quality.

### Outreach Materials

Outreach programs shall consist of written, audio, and visual materials and, when necessary, translated into appropriate languages or structured for appropriate ages. Permittees shall incorporate interactive methods of distributing outreach materials and provide for public participation in activities developed under this section.

#### A. Written Material

1. The Permittees shall produce a variety of written materials to convey information regarding storm water management within County watersheds.
2. Written materials shall include, but are not limited to: flyers, brochures, door-hangers, newspaper articles, mail-inserts, and newsletters.

#### B. Audio Material

1. All Permittees shall singularly or collectively utilize radio broadcast public service announcements to convey information regarding storm water management except in areas where public access radio stations are not available.
2. Examples of audio materials include radio advertisements, public service announcements, and informational recordings.

#### C. Visual Material

1. All Permittees shall implement a catch basin labelling program as well as other strategies such as banners, displays and posters to educate the public on the ultimate destination of storm drain system flows.
2. Each Watershed Management Committee shall produce at least one informational video. The video shall be shown on televised public service stations and cable access programs except in areas where cable access programs are not available. Further methods of distribution may include workshops, libraries, etc.

#### D. Distribution of Materials

Outreach materials shall be made available to the public at appropriate public



The Permittees shall continue to develop activity-specific outreach programs that inform residents about the problem of illicit discharges and dumping and that promote, publicize, and facilitate public reporting of these activities. The program shall also include continuing operation, maintenance, and promotion of the county-wide reporting hotline.

- C. The Permittees shall list pertinent City phone numbers under the City government directory located in the front section of local area phone books. This shall be updated annually as necessary and shall, at a minimum, include numbers for reporting on clogged catch basin inlets reporting illegal discharges/dumping and a general informational number for storm water. These phone numbers may be city-specific or area-wide.
- D. All reasonable efforts to coordinate public outreach efforts shall be undertaken. This may include coordinating with environmental groups and public agencies such as the California Coastal Commission, the Department of Beaches and Harbors, Resource Agencies, etc.

**Outreach to Target Audiences**

Permittees shall develop and implement an educational program that stresses pollution prevention for a variety of audiences, including local residents, school-aged children, businesses and public employees whose job functions and daily lives may impact storm water quality. The program may be developed locally or regionally and shall include at a minimum:

- Education on the proper use and disposal of pesticides, herbicides and fertilizers;
- Education on the definition of, identification of, and impacts associated with illicit discharges and procedures for reporting.
- Promotion of proper management of and disposal practices for used oil and hazardous substances.

**A. Local Residents**

- 1. Permittees shall develop a program to educate local residents on types of household hazardous wastes along with proper management and disposal methods. The program shall at a minimum include:
  - a. Information on the availability of collection services, such as location and schedule;
  - b. Production of public outreach materials that educate residents on source reduction and proper disposal methods for household hazardous wastes; and
  - c. Continue to encourage residents to recycle of oil, antifreeze, glass, plastics, batteries, etc. and to prevent the improper disposal of such

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materials to the storm drainage system.

Educational efforts throughout the watershed should also provide residents with detailed information regarding the Los Angeles County-wide Household Hazardous Waste Management Program. Other local programs shall be advertised as appropriate.

2. Permittees shall develop and encourage watershed residents to participate in specific storm water outreach programs. Residents shall be informed of and provided with the opportunity to share ideas and comments about the programs. Permittees shall demonstrate that a good faith effort has been made to outreach to different communities within the watershed. The watershed-wide outreach program shall be implemented by \_\_\_\_\_. This shall at a minimum include:

- a. Where applicable for fire and erosion prevention, mowing shall be encouraged as opposed to disking. An investigation of effectiveness shall be undertaken.

3. **Cooperative Public Outreach**

In order to promote public participation, cooperative outreach programs with local residents shall be developed. These cooperative programs should foster awareness and identification of storm water pollution issues among residents in the watershed. Catch basin labelling and other established sign programs are excellent examples of this type of cooperative effort, as are events like the "Storm water Pollution Awareness Week." One possibility for cooperative outreach is an "Adopt-A- " program. Residents can "adopt" highways, storm drains, catch basins, streams, etc. to monitor, restore and protect. The purpose of all cooperative outreach programs created is to inform and involve the public in storm water management.

4. **Complaint Procedures**

Public comments/complaints shall be requested by the Permittees in order to help gauge the success and effectiveness of storm water programs.

- B. **K-12 School Children**

School children can play an important role in public information and participation programs, as they are generally more easily motivated and any behavior changes they make tend to stay with them through adulthood. School children can also convey storm water pollution prevention messages to other family members. School programs shall include information on storm drain systems, the difference between sewers and storm drains, the importance of preventing storm water pollution, and may also address illegal discharges/dumping and reporting procedures, source minimization, and general pollution prevention. Written materials (workbooks and coloring books), videos, assemblies, and field trips are examples of effective components of a K-12 educational program.

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C. **Businesses**

A detailed public education and outreach program shall be developed for business operations with greater potential of discharging pollutants into the storm drain system. The program shall include employee training on and the effectiveness of implementing BMPs to reduce nonpoint source pollution. In addition to written, audio, and visual materials, other possible means of focused outreach may include: conducting workshops, mass mailings, submitting informational articles to trade/industry magazines, etc.

D. **Public Agencies and Employees**

Public agency employees shall be trained on storm water management and pollution prevention practices and involve employees on many different levels - from program managers to field personnel. Training programs shall include, but are not limited to, articles in City newsletters, training classes, checklists for field personnel, and interdepartmental forums or committees. Materials developed for other audiences may also be used in these public agency employee training programs. Appropriate public agency employees shall be trained in:

1. Emergency spill cleanup procedures.
2. Environmentally sensitive alternative products.
3. Good housekeeping practices.

Permittees shall provide outreach materials to the general public through business license renewal counters and/or make efforts to outreach through professional and business associations. Additionally, Permittees should consider producing educational materials for professionals and technicians not employed by public agencies.

**Outreach Based on Activity-Type**

A. **Industrial/Commercial**

A watershed-wide, general outreach program shall be set up by the WMC for all industrial and commercial facilities potentially discharging to the storm drain system. Furthermore, the WMC shall provide specific guidance objectives to these facilities regarding storm water program compliance by \_\_\_\_\_, and inform and remind all potential commercial and industrial dischargers of their obligations under the storm water program. The Permittees shall also encourage the proper disposal of all materials from industrial and commercial sites.

Prior to the WMC providing specific guidance objectives, subcommittees shall be established, as needed, to develop specific outreach materials for industrial/commercial categories and specific "high priority" activities. This shall include at a minimum: metal platers, restaurants, vehicle related facilities, etc...

**B. Construction**

The Permittees shall ensure that contractors properly install all necessary post-construction, permanent BMPs during initial construction and that any necessary maintenance needed during construction is performed. There shall be specific programs outlining correct practices.

In an effort to prevent concrete waste from entering the storm drain system, contractors shall observe the following guidelines:

1. Washout of concrete trucks should be conducted off-site or on-site in designated area;
2. Excess concrete should not be dumped on site; and
3. Employees and subcontractors should be trained in proper concrete waste management.

**Evaluation**

The EAC shall develop a process to evaluate the effectiveness of all public outreach programs implemented under this permit. Surveys and focus groups are examples of methods that can be used to gauge a program's effectiveness. They can also be used to provide insight into the program's direction and to help formulate attainable goals. Results of any evaluation method used shall indicate the community's level of awareness of storm water pollution. A watershed-wide program shall be implemented by \_\_\_\_\_.

August 25, 1995 (To be negotiated)

### VIII. PROGRAM EVALUATION AND REPORTING

The program may be modified subject to comments received under the Annual Review.

A procedure shall be developed and utilized for program evaluation and reporting by the Principal Permittee during the course of this permit. Under this procedure as outlined below, the EAC shall develop action-specific performance indicators and criteria, perform evaluation of compliance and effectiveness based on the performance criteria, establish schedules and mechanism for internal record keeping and reporting, and submit semi-annual and annual reports to the Regional Board using a standardized format.

The EAC, WMC, and/or each Permittee are responsible for collecting data needed for program evaluation, conducting self-evaluation, and reporting the results of evaluation to the Regional Board. The results reported to the Regional Board shall include both the collected data and analysis of the data. The reports shall include detailed explanation on how the evaluations are conducted, how and why certain provisions of the permits are met or not met, how the effectiveness of certain BMPs is determined or is not, and should a problem arise, how it shall be corrected. The Regional Board will make a compliance determination based on information submitted under this procedure.

#### A. Demonstration of Compliance

1. Each Permittee is responsible for demonstrating that the required BMPs as prescribed under this permit, as well as other BMPs included in the Watershed Management Plans, are implemented to the "maximum extent practicable." Each Permittee shall implement the required BMPs to the maximum extent practicable.
2. The Watershed Management Committees are responsible for demonstrating the effectiveness of other BMPs through conducting and reporting the results of pilot/demonstration projects for evaluating the effectiveness of BMPs in the watershed.
3. The degree and the effectiveness of BMP implementation shall be evaluated and reported by the Permittees using environmental and/or administrative indicators whenever possible. When environmental indicators are not readily and/or easily available, administrative indicators shall be used. These shall include indicators prescribed under relevant provisions of this permit, and/or other indicators deemed appropriate by the Watershed Management Committee, the Executive Advisory Committee, and/or ultimately the Regional Board. Examples of the quantitative indicators include the number of inspections conducted, number of staff increase, number of audience reached through public education, waste recycled, water conserved, hazardous waste collected, oil recycled, catchbasin waste removed, etc. Quantitative indicators of environmental conditions should also be reported if they can be linked to the effects of the BMP implementation.

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4. In order to yield comparable results for year to year evaluation on the success, the progress, and/or the failure in BMP implementation, and comparable results from area to area, a uniform data collection methodology shall be established for each of the required BMPs. The uniform data collection methodology shall be developed by the Executive Advisory Committee. Subsequently, each report on BMP implementation shall provide comparison with the implementation status during the previous reporting period and the scheduled implementation timeline for the current and future reporting periods, based on data collected using the uniform collection methodology.

**B. Internal Reporting and Record Keeping**

1. In order to facilitate the preparation of semi-annual and annual reports, the EAC shall develop standard forms for internal reporting to be used by all Permittees within the watershed. The forms shall collect all the information essential to the preparation of the annual and semi-annual reports and to the needs of other management actions by the Watershed Management Committees, EAC, and/or the Permittees. Reported information shall be quantifiable and specific for each program area and/or BMP. The dates for submitting the internal reports shall allow sufficient time for compilation and analysis by the Watershed Management Committees and/or the EAC for the preparation of semi-annual and annual reports to the Regional Board.
2. All records shall be retained by the Permittees for a period of 5 years or longer as required by the Regional Board or USEPA.

**C. Semi-annual and Annual Reports**

**1. Semi-annual Report**

The requirements under VIII.A shall be met by the submittal of semi-annual and annual reports. Semi-annual reports shall succinctly summarize compliance efforts and may consist of simple compliance checklists. Annual reports shall be comprehensive.

- a. The EAC shall submit a semi-annual progress report to the Regional Board by \_\_\_\_\_ of each year. Semi-annual reports must be submitted to the Regional Board within 30 days after the end of the six-month period. These six month periods are Jan - June, and July - Dec. (TO BE DETERMINED).
- b. The semi-annual report shall serve as a status report on the progress of the implementation of the Stormwater Management Plan and other permit provisions. The Watershed Management Committee is responsible for collecting and compiling information from each Permittee prior to preparation of the semi-annual report, and include the compiled information along with the information



analysis into the report.

- c. The semi-annual report shall consist of a summary table illustrating the levels of implementation for all requirements by each Permittee. Tables shall be developed for each program element listing the Permittees, describing the status of implementation by each Permittee of the element, and documenting any modifications of the element from the standard program.

2. Annual Report

- a. The Executive Committee shall submit an annual report to the Regional Board not more than 60 days after the end of each permit year (\_\_\_\_\_). The annual report shall include both a summary of the progress and status of Stormwater Management Plan implementation, a summary on status of compliance with all permit provisions, a report on the evaluation of program effectiveness, and a summary of recommendations for permit provision revisions. The Permittees as a whole (within watershed management areas) shall describe any problems encountered during implementation and discuss the modifications to the program in order to solve these problems.
- b. The Principal Permittee shall collect, compile, and analyze information from each Permittee within the watershed prior to preparation of the annual report. The Watershed Management Committee shall include the compiled information and its analysis (instead of raw data or copy of internal reports) in the annual reports.
- c. The annual report shall include a summary table illustrating the levels of implementation for all Permittees. Tables shall be developed for each program element listing all the participating Permittees and describing the status of implementation by each Permittee of the element. A table shall also be included to summarize the status of the program elements for which the Watershed Management Committee bears the primary implementation responsibility. Besides summary tables, the report should provide detailed explanation on any modifications made of the program elements (delays, changes, etc.) from the standard provisions and provide an analysis of any problems encountered during the implementation and the proposed solutions.
- d. The annual report shall include an assessment of the effectiveness of each program elements using the performance evaluation indicators and criteria developed under Section A of this Chapter, and the results of the pilot/demonstration projects conducted within and/or outside the watershed. The findings should be presented graphically for ease of comparison with the established levels of

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effort.

- e. A fiscal analysis and budget as described under I.I (Fiscal Resources) of this Order shall be submitted annually within 30 days of the Budget adoption date for each Permittee.

D. Storm Water Management Plan Revisions

1. Revisions to provisions of this permit can be made through the order of the Regional Board. The EAC can recommend and request revisions to the Stormwater Management Plan through documentation in the annual reports.
2. Recommended revisions shall be supported by the results of a program evaluation. Recommended revisions to the Stormwater Management Plans may be made if it can be demonstrated that 1) the changes will lead to improvement of the effectiveness of this program, 2) the changes will result in positive impacts of environmental conditions, and 3) that the current measures have been implemented to the "Maximum extent practicable" as defined in Section VIII.A. Any recommended revisions shall not take effect unless approved by the Executive Officer.
3. Revisions may be made to the Storm Water Management Plans by the Executive Officer or the Regional Board based upon public input and/or testimony.

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ATTACHMENT A

NPDES STORM WATER PERMIT  
WATERSHED MANAGEMENT AREAS

Santa Monica Bay

Malibu Creek and Other Rural

Agoura Hills  
Calabasas  
*Caltrans*  
*Los Angeles County*  
Malibu  
Westlake Village  
Ventura County

Ballona Creek and Other Urban

Beverly Hills  
*Caltrans*  
Culver City  
El Segundo  
Hermosa Beach  
*Los Angeles*  
*Los Angeles County*  
Manhattan Beach  
Palos Verdes Estates  
Rancho Palos Verdes  
Redondo Beach  
Rolling Hills  
Rolling Hills Estates  
Santa Monica  
West Hollywood

Dominguez Channel/  
Los Angeles Harbor Drainage

*Caltrans*  
Carson  
Gardena  
Hawthorne  
Inglewood  
Lawndale  
Lomita  
*Los Angeles*  
*Los Angeles County*  
Torrance

Los Angeles River

Alhambra  
Arcadia  
Bell  
Bell Gardens  
Burbank  
*Caltrans*  
Commerce  
Compton  
Cudahy  
El Monte  
Glendale  
Hidden Hills  
Huntington Park  
La Canada Flintridge  
*Long Beach*  
*Los Angeles*  
*Los Angeles County*  
Lynwood  
Maywood  
Monrovia  
Montebello  
Monterey Park  
Paramount  
Pasadena  
Rosemead  
San Fernando  
San Gabriel  
San Marino  
Sierra Madre  
Signal Hill  
South El Monte  
South Gate  
South Pasadena  
Temple City  
Vernon

San Gabriel River

Artesia  
Azusa  
Baldwin Park  
Bellflower  
Bradbury  
*Caltrans*  
Cerritos  
Claremont  
Covina  
Diamond Bar  
Downey  
Duarte  
Glendora  
Hawaiian Gardens  
Industry  
Irwindale  
La Habra Heights  
La Mirada  
La Puente  
La Verne  
Lakewood  
*Long Beach*  
*Los Angeles County*  
Norwalk  
Pomona  
Pico Rivera  
San Dimas  
Santa Fe Springs  
Walnut  
West Covina  
Whittier

Santa Clara River

*Caltrans*  
*Los Angeles County*  
Santa Clarita

*Italicized agencies are present in more than one watershed.*

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CALIFORNIA REGIONAL  
QUALITY CONTROL BOARD  
LOS ANGELES REG

August 4, 1995

Natural Resources  
Defense Council

6310 San Vicente Blvd., Suite 250  
Los Angeles, CA 90048  
213 934-6900  
Fax 213 934-1210

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Regional Water Quality Control Board  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Los Angeles County Department of Public Works  
900 S. Fremont Avenue  
Alhambra, California

Comments on the July 21, 1995, Draft Permit

We appreciate all the effort that has been put into development of the July Draft of the new permit ("July Draft"). In many respects the new draft is clearer and better organized. Below we discuss those areas where we have a concern that the new draft needs to be strengthened in order to achieve adequate stormwater programs throughout the county.

I. GENERAL COMMENTS

One of our principal concerns is that the new permit remain on schedule for adoption in December 1995. We fear that many cities are delaying further stormwater program improvements until adoption of the new permit. While we disagree with this approach, it is imperative that new guidance in the form of a new permit be issued as soon as possible.

In addition, this timing is critical for a smooth transition into the new permit. Municipal fiscal years begin in July and city staff will need time to research and design programs that meet the new permit requirements and to develop budgets to take to their city councils.<sup>1</sup> Delays which move the adoption of the new permit into 1996 may throw off the timing for getting budget items approved and programs implemented.

We are also concerned over the loss of detail in the July Draft. It is evident from our experience under the existing permit that cities are looking for more guidance, including specific programs they must implement in order to be in compliance with the permit. They

<sup>1</sup>In these comments we will use the terms "Co-Permittees" and "City" to include all cities, the County and, where applicable, Caltrans.

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San Francisco, CA 94105  
415 777-0220  
Fax 415 495-5996

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Honolulu, Hawaii 96813  
808 533-1075  
Fax 808 521-6841

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included directions for addressing inspections in smaller systems that use pumping stations and larger systems through a field screening program.

Instead, the July Draft relies upon the EAC to develop a watershed-wide program with standard procedures. First, the permit should not fully rely upon the EAC to develop this program. Rather, the new permit must contain specific minimum requirements for this program -- either in the permit or in the guidance document. Second, to the extent the EAC will develop the program, the development must be placed on a short timeline because its development could delay implementation of new programs by Co-Permittees. Third, the program developed by the EAC must allow for some variation among Co-Permittees based on size, characteristics, etc., and allow for Co-Permittees to implement programs that go beyond the minimum.

Fourth, there needs to be a provision in the new permit for public comment and review of the EAC's proposal. The Permit must also make crystal clear (which it does not) that the EAC program, once approved, must be implemented by all Co-Permittees.

Additionally, there is no longer a section specifying Public Outreach provisions. We assume this section will be combined into an overall public education/outreach section. We look forward to the new permit containing very specific public outreach requirements, including targeting of certain industries and populations (e.g., gardeners, consumers, restaurants, auto-related businesses, industries and contractors).

#### **IV. PROGRAM REQUIREMENTS FOR INDUSTRIAL/COMMERCIAL SOURCES**

Our primary concern over the industrial/commercial section of the July Draft is that it has been substantially weakened from the February draft. While some specific provisions could be redirected to the guidance document, others, including minimum requirements for inspections, required use of inspection checklists, and required identification of pollutant sources must be included as requirements of the new permit. Indeed, the Regional Board may want to develop acceptable checklists as part of its guidance document.

In addition, the provision in section III(A)(1) that industrial/commercial facilities be inspected once every five years is totally inadequate. While perhaps low risk facilities could be inspected less frequently, the general rule should be that yearly inspections are required. Moreover, the July Draft does not make clear whether all or only the priority facilities must be inspected during this five-year interval.

The July Draft also must be revised to require (as the February Draft did) that the Co-Permittees identify which facilities are subject to the state industrial stormwater permit and whether or not they have filed an NOI. This should be part of the required database that must be developed pursuant to Section III (A)(2) of the July Draft.

This section of the July Draft also contains much weaker required reporting and









# City of Malibu

2355 Civic Center Way, Malibu, California 90265-4965  
(310) 456-CITY Fax (310) 456-3356

June 30, 1995

Menerva Daoud  
900 S. Fremont  
Alhambra, CA 91803

Re: Establishment of a Marine Sanctuary

Dear Ms. Daoud:

Our City is considering the establishment of a marine sanctuary off the coast of Malibu. Such a measure may be of interest to several offices, including yours. With this letter, I respectfully request any initial comments your office may have regarding the establishment of the marine sanctuary.

I have enclosed a document from Morrison and Foerster which provides information regarding the implementation of the sanctuary. I would appreciate a response forwarded to the address above by July 31, 1995. Thank you for your comments and response.

Sincerely,

*Kallie Hoy*

Kallie Hoy  
Intern Assistant to City Manager

*Vik Babine  
Planning Division*

*4363*

*7/24/95  
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DAVE CARROLL CITY MANAGER  
REPORTS THAT IT MAY BE CALLED TO  
HAVE A LAW BUT IMPLEMENTATION MAY  
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MORRISON & FOERSTER

Mr. David N. Carmany  
March 27, 1995  
Page Two

City's failure to annex the offshore lands complicates the City's ability to establish a marine sanctuary because it will require the involvement and support of the County of Los Angeles.

Save Our Coast's proposal is divided into four major parts. First, Save Our Coast explains the unique characteristics of the Malibu coastline and waters and why they warrant protection through the establishment of a marine sanctuary. To that end, we have attached as Appendix A various articles and other information that document the negative impacts that certain ocean activities have had on the marine life along the Malibu coast.

Second, Save Our Coast describes and analyzes the three principal legal options available to the City for the establishment of a marine sanctuary under California law: (i) a refuge established by special legislation; (ii) an ecological reserve established by the California Fish & Game Commission ("FGC"); and (iii) a refuge set up through the SLC.

Third, based upon our analysis of the legal parameters and certain practical considerations, Save Our Coast recommends to establish a marine sanctuary by special legislation.

Fourth, Save Our Coast proposes certain objectives for the City to consider in establishing a marine sanctuary. In determining the proposed objectives, Save Our Coast has attempted to balance its desire to provide significant protection for the unique marine environment off the City's coast with the need to accommodate certain existing human uses of the area.

DISCUSSION

A. Reasons for a Marine Sanctuary.

Malibu's coastal waters are biologically unique. A number of endangered or threatened species either live in the coastal area, or depend on the coastal waters for their survival. For example, the Guadalupe fur seal, which has been designated as a threatened species under California law, is found in Malibu waters.<sup>2</sup> As well, the California

<sup>2</sup> 14 Cal. Code of Regs. § 670.5(b)

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March 27, 1995  
Page Six

amphibia, and marine life within any refuge."<sup>14</sup> Fourth, any statutory and regulatory provisions that are applicable to the particular Fish & Game District in which the refuge is located, also apply to the refuge, unless they conflict with refuge-specific provisions.<sup>15</sup> Fifth, the general regulations applicable to all refuges are enforceable not only by the Department, but also by the "district attorney, sheriff, and all peace offices of the county in which the refuge or part thereof is situated,"<sup>16</sup>

In addition to these general principles, the special legislation that establishes a particular refuge often contains provisions that are tailored towards the unique needs of the area in which the refuge is being established. In Save Our Coast's opinion that is one of the principle advantages of a legislative refuge.

b. Examples.

For example, the San Diego Marine Life Refuge, which was established in 1957, protects invertebrates and marine plant life from any taking, except that the University of California is allowed to take such life from the refuge for scientific purposes.<sup>17</sup> Similarly, the Catalina Marine Science Center Marine Life Refuge, which was established in 1968 off the coast of Santa Catalina Island, allows limited scientific research,<sup>18</sup> but prohibits all other takings of fish and marine plants in the refuge.<sup>19</sup>

Several other refuges established in Southern California have also taken advantage of the flexibility inherent in setting up refuges through special legislation. For example, the marine life refuges in Laguna Beach, Newport Beach, Point Fermin, South Laguna Beach, Dana Point,

14 § 10502(d).

15 § 10511.

16 § 10508.

17 § 10658; see also § 10902 (boundaries of the refuge).

18 §§ 10502.3, 10655; see also § 10932 (boundaries of the refuge).

19 § 10655.3.

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MORRISON & FOERSTER

Mr. David N. Carmany  
March 27, 1995  
Page Eight

specifically provides that "(n)o State may enforce, or attempt to enforce, any State law or regulation relating to the taking of any species . . . of marine mammal within the State. . . ."25 Although the Marine Mammals Protection Act generally prohibits the taking of marine mammals, it provides for a limited, yet troubling, exception for marine mammals "taken incidentally in the course of commercial fishing operations."<sup>27</sup> California law has expressly recognized Congress' intent to preempt state laws regarding the taking of marine mammals and prohibits the taking of marine mammals only to the extent consistent with federal law.<sup>28</sup> Accordingly, Save Our Coast believes that any prohibition on the taking of marine mammals in a marine sanctuary off the coast of Malibu would have to be similarly limited.

In an effort to protect marine mammals further than the federal law, but consistent therewith, California law now bans the use of gill nets and trammel nets.<sup>29</sup> Naturally, this prohibition only applies to ocean waters over which the state has jurisdiction, i.e., three miles offshore, and not to ocean waters over which the federal government has jurisdiction.<sup>30</sup>

The existing federal and state prohibitions against the killing of marine mammals (except for incidental killing) and the existing state prohibition against the use of gill and trammel nets within the three mile zone should provide some protection for marine mammals. Save Our Coast believes, however, that a refuge that expressly includes the protection of marine mammals would increase such protection because it would raise public awareness of the issue and

26 16 U.S.C. § 1379(a).

27 16 U.S.C. § 1371(a)(2).

28 § 4500(a).

29 Cal. Const. Art. XB.

30 Vietnamese Fishermen Ass'n of America v. California Dep't of Fish & Game, 816 F.Supp. 1468, 1476 (N.D. Cal. 1993). The district court held that, as applied to rockfish, the gill and trammel net prohibition was inconsistent with federal law and could not be enforced in ocean waters beyond the three mile zone.



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action or approval by a commission, such as the FGC or the SLC.<sup>32</sup>

Save Our Coast has had several discussions with individuals involved in the expansion of the legislative refuge in Laguna Beach. According to Senator Bergerson's office, the refuge bill, once drafted, was approved by the Legislature within four months.<sup>33</sup>

Clearly, the timing for the establishment of a refuge in Malibu would differ because it would involve the establishment of a brand-new, rather than an expanded, refuge, and because the City would have to resolve the issues surrounding its seaward boundary. Specifically, the City would not be able to request the establishment of a legislative refuge on (submerged and offshore) land that is not within its boundary. If the City is not in a position to complete the annexation process of such land, it would have to work closely with the County of Los Angeles and the SLC to establish a refuge.

2. Ecological Reserve.

a. Overview.

The second option for the City is to establish an ecological reserve through the Department.<sup>34</sup> An ecological reserve is defined as follows:

land or land and water areas that are designated as an ecological reserve by

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32 The analysis presented herein does not address the jurisdiction and possible involvement of the California Coastal Commission. As the agency with jurisdiction over the development and uses of coastal areas and submerged lands, the California Coastal Commission will play, at a minimum, an advisory role. Cal. Pub. Res. Code § 30103. The Commission could be involved further if the establishment of a marine sanctuary required changes to the City's Local Coastal Program. Cal. Pub. Res. Code § 30510 et seq.

33 Discussions with Ms. Holley Veale from Senator Bergerson's office (714) 640-1137.

34 § 1560.

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the commission (FGC) pursuant to Section 1580 and that are to be preserved in a natural condition, or which are to be provided some level of protection as determined by the commission (FGC) for the benefit of the general public to observe native flora and fauna and for scientific study or research.<sup>35</sup>

Based upon this definition, an ecological reserve can be established to preserve the natural condition of land and water areas or to provide appropriate levels of protection for such areas. Under the Department's regulations relating to ecological reserves, such reserves generally protect all forms of wildlife within the reserve. Thus, in contrast to the different types of legislative refuges, an ecological reserve by definition is not limited to the protection of a particular form of wildlife.

The Department's general regulations regarding ecological reserves are extremely stringent and do not lend themselves to a semi-urbanized coastline like Malibu's. In particular, the regulations limit or prohibit access to the reserve, restrict various types of activities in the reserve, such as use of motor vehicles, swimming, horseback riding, boating, introduction of species, feeding of wildlife, use of pesticides, littering, and operation of aircraft. Fishing is permitted only from shore and any commercial fishing is completely prohibited, unless otherwise expressly permitted by the Commission.<sup>36</sup> Collection of samples for scientific and research purposes can be done pursuant to a Commission permit.<sup>37</sup>

Thus, the general regulations clearly limit or prohibit a wide array of activities that have been traditionally enjoyed by the residents and visitors of the City. For example, swimming, boating, surfing and fishing are activities that many Malibu residents and visitors engage in on a regular basis and that should not now be prohibited. As such, any ecological reserve would have to be tailored to meet the City's needs.

<sup>35</sup> § 1584.

<sup>36</sup> 14 Cal. Code of Regs. § 630(a)(1)-(21).

<sup>37</sup> 14 Cal. Code of Regs. §§ 630(a)(2), 650.



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b. Examples.

Notwithstanding the general regulations, the Department has established ecological reserves that impose far less stringent requirements. In other words, just as refuges established by special legislation are specifically tailored to a particular area, so are ecological reserves established by the Department.

For example, in the Farnsworth Bank Ecological Reserve off the coast of Santa Catalina Island the taking of purple coral or geological specimens is prohibited; however, all other general restrictions are expressly made inapplicable.<sup>38</sup>

The Upper Newport Bay Ecological Reserve in Orange County allows fishing from boats and from shore, wading to collect clams, swimming in certain areas, boating subject to a five miles per hour speed limit, and walking and horseback riding in designated areas. Furthermore, it permits the County of Orange to perform its municipal duties without any impairment. Accordingly, the regulations allow the County to:

carry out management activities for fish and wildlife, flood control and vector control. Authorized operation and maintenance activities shall include, but shall not be limited to use of chemicals, vegetation control, water control and use of associated equipment.<sup>39</sup>

Another ecological reserve that contains restrictions that may be appropriate for the City is the Carmel Bay Ecological Reserve in Monterey County. In that reserve, sportfishing is permitted from boats as well as from shore. Swimming, boating, surfing, skin and SCUBA diving are permitted in the entire reserve. Invertebrates, however, may not be taken or destroyed and kelp harvesting is subject to certain limitations.<sup>40</sup>

<sup>38</sup> 14 Cal. Code of Regs. §§ 630(b)(6)(A) and (B).

<sup>39</sup> Id. at § 630(b)(18)(A)-(E).

<sup>40</sup> Id. at § 630(b)(26)(A)-(G).

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c. "Reserves".

While the Code only provides for the establishment of ecological reserves, the Department has also established so-called "reserves". A "reserve" is an area in which the Department has prohibited the taking of certain limited types of fish or other marine life pursuant to its general regulatory authority.<sup>41</sup> For example, the Department has prohibited the taking of any form of marine life at the Lover's Cove Reserve off the coast of Santa Catalina Island.<sup>42</sup> As well, the Department has prohibited the taking of marine plant life and invertebrates at the Point Loma Reserve in San Diego County.<sup>43</sup> Consequently, the Point Loma Reserve effectively provides the equivalent protection as a marine life refuge established by special legislation.

d. Procedure.

In order to establish an ecological reserve, the City would have to make a proposal, supported by relevant documentation to the FGC. Such a proposal is probably similar in form and content to the proposal submitted to the Legislature to create a legislative refuge. As a regulatory agency, the FGC would be required to go through an environmental impact analysis under CEQA prior to establishing an ecological reserve or a "simple reserve."<sup>44</sup>

In addition, the Department would have to acquire the area in which to establish the ecological reserve.<sup>45</sup> Thus, the Department likely would acquire the area from the SLC either in form of a grant, subject to legislative action, or in form of a long-term lease.

41 §§ 200, 205.

42 14 Cal. Code of Regs. § 27.40.

43 14 Cal. Code of Regs. § 27.50.

44 Cal. Pub. Res. Code §§ 21001.1, 21063, 21080.

45 § 1530.

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e. Assessment of Establishing an Ecological Reserve.

Save Our Coast does not perceive any additional flexibility or protection associated with the establishment of an ecological reserve by the Department that are not also available through the establishment of a legislative refuge. In addition, this option presents numerous significant disadvantages. First, the requirement of an environmental review process under CEQA would be time-consuming and costly to the City. Second, the Department has been and continues to be understaffed, which could lead to delays in the establishment of the reserve. Third, the Department's acquisition or long-term lease of the area would actively involve the SLC and the Legislature, which could lead to further delays.

3. SLC Sanctuary.

a. Overview.

The third potential option for the City is to establish a marine sanctuary through the SLC ("SLC Sanctuary"). There is very little precedent for the establishment of such a sanctuary. Based upon our discussions with SLC staff, we have concluded that the SLC would only support the establishment of a SLC Sanctuary if the FGC supported such action.<sup>46</sup> In other words, if the FGC, which is charged with the protection of wildlife did not support the establishment of a marine sanctuary, the SLC likely would not proceed with it.

By way of background, the SLC exercises exclusive jurisdiction over all submerged lands in California, including tidelands, bays, estuaries and all land below the mean high tide line, unless such lands have been granted to other entities by special legislation.<sup>47</sup>

The SLC holds such lands subject to a public trust requirement, which means that any activities that the SLC approves for the land must be for the good of the community at large. Subject to that requirement, the SLC may grant or lease state lands that would otherwise be under its

46 Discussions with Curtis Fossum, SLC, (916) 222-7841.

47 Cal. Pub. Res. Code § 6301

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jurisdiction to a county, a city, a private entity or another government agency

If the SLC grants the land, the SLC most often makes grants for limited purposes, thereby retaining partial authority over the land.<sup>48</sup> Similarly, if the SLC leases the land, it usually leases the land for certain purposes and retains rights over the land. For example, the SLC has leased state lands to the Department for the establishment of certain wildlife areas in the past.

b. Examples.

As indicated above, there is little precedent to support the use of a SLC grant as the basis for a broad-based SLC sanctuary. The only SLC sanctuary that we have been able to locate involves a 1958 grant to the City of Palos Verdes Estates. The 1958 grant, which amended a 1963 grant, includes the following purposes:

preservation of intertidal and subtidal marine biological reserves, development of natural trails, and ocean phenomena for surfing and other water sports subject to California Fish & Game Code and the natural beauty related thereto.<sup>49</sup>

This grant supplemented the original 1963 grant of "tidelands and submerged lands" for the purposes of "commerce, navigation, harbor, airport, highways and utilities, public buildings and recreation, marinas, restaurants and motels, etc."<sup>50</sup> Thus, the City of Palos Verdes Estates holds a grant for the purposes of establishing a commercial harbor and related developments as well as for the purposes of preserving the natural habitat.

No one at the City of Palos Verdes Estates has any working knowledge of the sanctuary or how it is being administered. In fact, according to city officials, the sanctuary covers only a tiny portion of the 4.6 miles of shoreline involved in the grant. This information has been

48 Cal. Pub. Res. Code § 6324.

49 See Appendix C.

50 Id.

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confirmed by the SLC, which also indicated that the principle purpose of the grant was to establish a harbor and related facilities.

c. Procedure.

In order to receive a grant from the SLC for the establishment of a SLC Sanctuary, legislative action is required. Thus, the City would have to contact its local State Legislators, i.e., Senator Hayden or Assemblywoman Kuehl, and solicit support for a bill. The proposal for a legislative grant would have to provide sufficient scientific information to allow the SLC to find that the grant would be consistent with its public trust obligations and to allow the FGC to support the creation of a marine sanctuary. In addition, the City, in its capacity as the proposed grantee, must submit to the SLC and the legislature a general plan for the use of the area that it seeks to have granted, together with the review and comments of other interested state agencies, such as the California Coastal Commission.<sup>51</sup>

It appears that this process is very similar to the process necessary to establish a legislative reserve. However, there are several important differences. First, the establishment of a SLC Sanctuary requires discretionary action by a state agency, thereby triggering environmental review obligations under CEQA. Second, a legislative grant of land usually is fairly controversial and involves higher levels of legislative scrutiny.

In order to receive a lease, a legislative bill is not necessary. As indicated above, the SLC has leased state lands to the Department to establish wildlife refuges. As in the case of an actual grant, however, the SLC likely would look towards the FGC to determine whether the creation of a SLC Sanctuary was appropriate. Similarly, an environmental review process under CEQA would be required.

d. Assessment of Establishing a SLC Sanctuary.

Although a SLC sanctuary arguably provides significant flexibility and local control, the establishment

<sup>51</sup> Cal. Pub. Res. Code § 6373.

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of such a sanctuary involves numerous administrative hurdles. First, there is little precedent to support the use of a SLC grant or lease to establish a sanctuary. Thus, the establishment probably would take more time than the other two options. Second, the SLC would work closely with the FGC and, possibly also, with the legislature. Thus, the City would have to coordinate with two regulatory agencies as well as the State Legislature. Third, the other two well-tested options appear to meet adequately the current and immediate needs of the marine environment off the City's coast. Fourth, the establishment of a SLC Sanctuary possibly would trigger some level of environmental review under CEQA.

C. Save Our Coast's Recommendation.

Based upon our analysis of the legal and practical considerations outlined above, Save Our Coast recommends that the City establish a refuge through special legislation, i.e., Option 1.

1. Size and Boundaries.

As to the size and boundaries of the proposed marine sanctuary, Save Our Coast naturally would like to see the entire 26 mile coast line of Malibu protected. As well, Save Our Coast would like to have the sanctuary extend offshore to the State's jurisdictional boundary.

However, Save Our Coast recognizes that certain existing uses of particular portions of the Malibu coast line may not be compatible with the establishment of a marine sanctuary. This likely would be the case with regard to the current wastewater outfalls from the Tapia sewage treatment plant along Malibu Creek. It is Save Our Coast's intent to work with the City in determining the precise boundaries and to minimize conflict with other established uses while maximizing the intended and much needed protection for all forms of marine life.

Similarly, Save Our Coast recognizes that the extension to the full three miles may raise opposition from commercial fishing interests as well as recreational boating and fishing interest. Accordingly, it may be advisable to proceed in stages by first establishing a sanctuary that extends only several hundred feet seaward and later extending the sanctuary for the full three miles.

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Furthermore, most already established refuges do not extend offshore for the full three miles. For example, the seaward boundary of the Laguna Beach Marine Life Refuge is 600 feet into the Pacific Ocean from the mean high tide line.<sup>52</sup> The seaward boundary of the Dana Point Marine Life Refuge is 1,200 feet from the mean high tide line.<sup>53</sup> Even the California Sea Otter Game Refuge appears to extend less than one mile into the ocean.<sup>54</sup> For your convenience, we have attached the most recent collection of maps of refuges and reserves established in Southern California.<sup>55</sup> Based upon the types of refuges and reserves that have been established, it is clear that the establishment of a reserve extending three miles out would trigger significant legislative scrutiny that may not serve the speedy establishment of a refuge off the coast of Malibu.

Moreover, the establishment of a refuge closer to the coast may also make the enforcement of the refuge easier. For example, our discussions with the City of Laguna Beach's staff reveal that Laguna Beach enforces its sanctuary entirely from the coast, without the use of boats and only with the occasional help from the Department's regional office in Long Beach.<sup>56</sup> Naturally, successful enforcement of a refuge that extends the full three miles offshore would require the use of boats, which may be difficult to accomplish for budgetary and other reasons.

In brief, Save Our Coast is very much interested in working with the City in developing a legislative proposal that can be accomplished during the next legislative session.

2. Budget.

Recognizing the City's strained resources, Save Our Coast would like to provide some preliminary information

52 § 10904.

53 § 10907.

54 § 10840.

55 Appendix D.

56 Discussions with Cindy King, Assistant City Manager, City of Laguna Beach, 714) 497-1311.

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regarding the costs of maintaining a sanctuary. This information is primarily based upon Save Our Coast's discussions with the City of Laguna Beach. While the City's organizational structures differ from those found in Laguna Beach, Save Our Coast believes that this information is useful and can serve as the basis for further discussions within the City as well as with the State Legislators, regulatory agencies and the County of Los Angeles.

The Laguna Beach refuge is not a separate budget term for the city. In particular the enforcement obligations are performed by local peace and marine officers as well as Department officers (on a limited basis). The signage to mark the refuge is established and maintained by the municipal services department as part of its regular service functions.

D. Proposed Restrictions.

As indicated throughout this letter, Save Our Coast proposes to establish a marine sanctuary in the form of a legislative refuge that would protect marine mammals, fish, clams, invertebrates and marine plant life. In order to provide the City with Save Our Coast's ideas regarding the proposed restrictions, it sets forth several restrictions below.

1. Fishing of the following types of fish with a sport fishing license as authorized under the California Fish & Game Code is permitted: (To be determined.)
2. Taking of the following types of clams and invertebrates is permitted: (To be determined.)
3. Taking of aquatic life for scientific purposes as authorized under the California Fish & Game Code is permitted.
4. Taking of all other kinds of aquatic life, including fish, clams and sea plants, is prohibited.<sup>57</sup>
5. Taking, killing and any type of harassment of and extensive interaction with marine mammals is prohibited.

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<sup>57</sup> If sea kelp is lawfully removed under currently existing leases, Save Our Coast proposes to make an exception for such leases, but to prohibit the granting of new leases.









**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

June 14, 1995

IN REPLY PLEASE REFER TO FILE: A-0

Ms. Catherine Tyrrell  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Ms. Tyrrell:

**PHASE II AND III MONITORING PROGRAM**

Enclosed is a copy of the April 4, 1995 draft letter from Mr. Ghirelli to Mr. Stone concerning the status of implementation of our monitoring program action items. We have handwritten comments next to each point raised in the draft letter. Also enclosed are detailed comments on the draft letter.

After you and your staff have reviewed our comments, we would like to meet and resolve any remaining concerns. Please contact me at (818) 458-4014 to set up a meeting at our mutual convenience.

Very truly yours,

HARRY W. STONE  
Director of Public Works

DONALD L. WOLFE  
Deputy Director

DLW:djm

Enc.

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

01 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
213) 266-7500  
FAX (213) 266-7600



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April 4, 1995

Harry Stone, Director,  
County of Los Angeles  
Department of Public Works  
900 South Fremont Avenue  
Alhambra, CA 91803-1331

SUBMITTAL OF PROPOSED STORMWATER/URBAN RUNOFF MONITORING PROGRAM FOR PHASES II & III (NPDES File No. CA0061654, CI 6948, Board Order No. 90-079)

We have received your March 15, 1995, letter regarding the status of progress on implementation of monitoring program action items. We have discussed the relevance of these action items to the Phase II and III *Proposed Stormwater/Urban Runoff Monitoring Program* at our February 23, and March 23, 1995, meetings. The key points of these discussions are:

1. Action Item (g.), Submit a revised monitoring program for Phases II and III that includes all program elements with timelines for development and implementation, as not been accomplished. Per our discussions, you are required to submit a revised monitoring program that includes all elements of the tentative Cease and Desist Order of September, 1994. The revised monitoring program must include:

*We view these as being the same. Will go ahead and do.*

- a. A definition of monitoring as it applies to the proposed program;
- b. The goal and objectives of the proposed monitoring program;

*not clear what else he is after.*

*We have timeline for installation of 14 new stations. Will give to Mark.*

- c. A detailed timeline for the development of a monitoring network, the installation of the monitoring equipment, the testing of the monitoring equipment, the sampling of dry- and wet-weather flows and all significant milestones related to this task;

*frequency proposed as part of narrative in plan. can convert to a timeline format*

*will develop timeline showing all tasks to date, subject to sufficient number and size stations having been installed to collect matter to be done.*

- d. A detailed timeline for the modeling of pollutant loads from the proposed monitoring stations in the Phase II and Phase III areas;

*can develop timeline.*

- e. A detailed timeline for the implementation of targeted monitoring to identify sources of specific pollutants in stormwater and urban runoff in the Phase II and Phase III areas;

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Mr. Harry Stone  
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*can develop timeline and effectiveness evaluation methodology assuming approach is acceptable to Purnford.*

*see also detailed comments*

f. A detailed timeline for the implementation of a program to evaluate Best Management Practice effectiveness. The program must include the methodology for effectiveness evaluation. We would like to see the implementation forms developed by the County (or their equivalent) used throughout the Los Angeles County program;

*see detailed comments*

g. A detailed timeline for the implementation of a program to identify locations of illegal practices and to eliminate pollutant sources in the Phase II and III areas; and,

*awarding our RFP for stormwater impacts would allow for timeline to be developed.*

h. A detailed timeline for the implementation of a program to evaluate storm water impacts on receiving waters.

*has been done. see detailed comments.*

i. The Proposed Stormwater/Urban Runoff Monitoring Program must be made available to the public for comment. Proof of accomplishment of this requirement must be submitted with the revised monitoring program.

Additionally, the Proposed Stormwater/Urban Runoff Monitoring Program referenced Appendices 5 and 6 on page 60 of the draft document. These Appendices were not included in the document submitted to the Regional Board for review.

If you have any questions regarding our comments on the Proposed Stormwater/Urban Runoff Monitoring Program, please call me at (213) 266-7510 or have your staff call Catherine Tyrrell at (213) 266-7515 or Mark Purnford at (213) 266-7596.

ROBERT P. GHIRELLI, D.Env.  
Executive Officer

Enclosure

cc: See attached mailing list

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## ANALYSIS AND RECOMMENDATIONS

### 1. Estimation of annual pollutant loading

The "early permit" did not clearly state it as a monitoring requirement. The Regional Board later made it clear (2nd yr. review) partly based on recommendation of the SMBRP design. The Regional Board also specifically required the County to a) select methodology and models and b) add more monitoring stations. All these steps are necessary in order to obtain reliable loading estimates.

**Recommendations:** Incorporate the Regional Board (2nd yr. review) requirements in the new permit. Also adopt additional recommendations by the SMBRP TAC (regarding loading estimate methodology and QA/QC requirements)

### 2. Monitoring for long term trend

Tracking long-term trend is one of the reasons for estimating annual pollutant loading. Therefore, it probably needs not to be singled out as a monitoring objective separated from estimation of annual loading. All it requires is to have representative monitoring stations fixed for a long period of time and a valid statistical method (as discussed in the LARWQCB's 2nd yr. review).

**Recommendations:** State it as part of the objective for estimating annual pollutant loading. Incorporate the requirements in Regional Board's 2nd yr review into the new permit.

### 3. Pollution source identification

The "early permit" clearly stated this as a monitoring requirement. In the following years, the County has interpreted it as to identify problematic land uses, while the Regional Board has moved a step further by requiring pilot/model program to identify problematic establishments and activities. It was argued that this could be achieved through on-site monitoring and other tools such as the one to be developed by the SMBRP. However, whether they should be part of the ambient monitoring program is debatable.

**Recommendations:** Retain source identification as a monitoring objective. Require the County to conduct monitoring to assess pollutant characteristics and estimate loads from typical land uses. Require co-permittees to utilize information generated under the land-use specific monitoring to conduct targeted pilot/model projects to identify problematic establishments and activities. If

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applicable, these pilot/model projects can be addressed under other program elements.

4. Evaluation of BMP effectiveness

This objective was not addressed in the "early permit." Ambient monitoring is not a primary mean for evaluating the effectiveness of BMPs, especially in the short-term. However, monitoring can be useful in evaluating BMP effectiveness if a pilot structural or non-structural BMP are deliberately conducted in a restricted up-stream area.

**Recommendations:** State it as a monitoring objective. Prescribe specific requirement only in areas where it is applicable.

5. Identification of illicit discharge

The two requirements (3.1.1 and 3.1.3) in the "early permit" have caused some confusion. LAC-DPW has interpreted the two as the same requirement, and they propose to fulfill the requirements by a plan of procedures to conduct storm drain inspections and field screening/testing. The Regional Board has maintained that besides establishing the procedure under 3.1.3, identification of illicit discharge should also be an objective of the monitoring program. The Regional Board also made it clear that in order to meet this objective, the County's monitoring program should include selected screening indicator parameters, flexible locations of monitoring stations, and other relevant components (LARWQCB 2nd yr. review).

**Recommendations:** Keep identification of illicit discharge as an objective of the monitoring program to encourage the LAC-DPW to incorporate indicators in the suite of monitoring parameters that are helpful in detecting and tracking illicit discharges.

Avoid describing identification of illicit discharge as a "monitoring program." (It is a monitoring objective that can be achieved by incorporating certain monitoring components.)

Require that the procedures to conduct storm drain inspections to include a protocol for responding to indications of illicit discharges detected under the monitoring program.

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6. Evaluation of storm water impacts

This is not stated as an objective in the "early permit." However, this is an area that need to be greatly enhanced.

Recommendations: Incorporate earlier Regional Board requirements (2nd yr. review) in the new permit. Also adopt the recommendations of the SMBRP TAC (e.g. participating research project to conduct sediment survey)

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Summary of Monitoring Objectives and Requirements

Documentation	Monitoring Objectives						Note
	Estimate Annual Pollutant Loads	Monitor long-term trends	Identify sources of pollutants	Evaluate BMP effectiveness	Identify illicit/illegal discharge	Evaluate impacts on receiving water	
EPA Regulation (11/16/90)	Estimate annual pollutant load of cumulative discharges based on even mean concentration. Modelling, data analysis, and calculation methods specified (122.26(d)(2) (B))			Estimated reduction in loadings as the result of the municipal management program (122.26(d)(2) (v))			
Current ("early") permit - Year 1 requirements	A work plan for development of a monitoring program which lists constituents and parameters to be monitored, locations, sampling methodology, frequency with supporting rationale for their choice. (2.1.8)						
Current ("early") permit - Year 2 requirements			A monitoring program designed to detect accurately the constituents and parameters of concern and to identify their possible sources (3.1.1)		A monitoring program designed to identify illegal dischargers and or locations of illicit disposal practices (3.1.1)		The requirements also include 3.1.3: Plan with schedule of implementation of procedures to detect and eliminate illegal discharges and illicit disposal practices
SMBRP design	Assess the extent of pollutant loadings to SM Bay	Provide information for assessing long-term trends	Identify areas with potential water quality problems and accurate and defensible detection of constituents	Provide information that allows the determination of the need for and the prioritization of BMPs	Installation of continuous flow monitoring stations could be used to identify illicit dumping or illegal connections.		

<p>Pilot monitoring plan submitted by LAC-DPW (03/26/92)</p>			<p>To gather runoff quality data from various land uses so as to identify possible sources of pollution</p>		<p>Identify illegal discharges and/or locations of illicit disposal practices</p>		<p>Plan of procedures to detect and eliminate illegal discharges and illicit disposal practices be submitted separately. Temporary sites may be established within areas to provide more detailed, localized information for areas suspected to contain illegal discharges.</p>
<p>LARWQCB 2nd yr. review</p>	<p>Development of methodology to refine estimates of pollutant loads must be completed by 07/15/93.                  - Modify the choice of sampling stations to include major drainage basin                  - Make first estimate using the pilot                  - Increase the # of stations to meet the two-stations/land use criterion                  - Select an appropriate mathematical model (simple one for the whole basin and a dynamic one for large sub-basins)</p>	<p>The objective (of long-term monitoring) must be accomplished no later than 01/15/94.                  - Fixed stations representative of the 27 basins                  - Description of the statistical methodology</p>	<p>A detailed description of a pilot or model program to meet this objective be submitted by 07/15/93, program be implemented by 01/01/94                  - priority industrial                  - priority commercial/retail                  - land use categories                  - urban transportation corridors</p>	<p>A detailed description of a plan to meet this objective, outlining pilot projects for immediate implementation is due 01/15/94                  - structural controls evaluated in specific locations by discrete sampling                  - evaluate effectiveness of non-structural BMPs locally                  - Monitoring regional structural BMPs routinely</p>	<p>A detailed description of a plan to address this objective and the area for immediate implementation must be submitted by 01/15/94                  - Selected screening indicator parameters                  - Flexible locations</p>	<p>A detailed description of a plan to achieve this objective must be submitted by 01/15/94                  - Screening for in-stream toxicity                  - Evaluation of stream sediment toxicity using biological approaches such as the triad method (i.e., bulk sediment chemistry, sediment toxicity, and benthic community survey)</p>	

<p>LARWQCB Tentative cease and desist order</p>	<p>Test and integrate a selected model to refine annual loading estimates by 10/15/95</p>	<p>Render operational the 9 stations to establish long-term trends by 01/15/96</p>	<p>Implement targeted monitoring to identify source of specific toxic pollutants by 01/15/95</p>	<p>Implement a monitoring program to evaluate effectiveness of specific BMPs by 01/15/95</p>	<p>Implement a monitoring program to identify locations of illegal practices, and to eliminate pollutant sources by 01/15/95</p>	<p>Implement a program to evaluate storm water impacts on selected receiving waters including conducting toxicity studies by (01/15/95)</p>	
<p>LARWQCB Draft new permit</p>	<p>Integrate into the program a selected storm water model to (1) predict estimates of pollutant loads, (2) refine annual estimates of pollutant loads and (3) project the effectiveness of control methods</p>	<p>Operate the initial monitoring network of minimum 7 stations to establish long-term trends</p>	<p>Conduct monitoring to assess pollutant characteristics and estimate loads from typical land uses. Conduct targeted monitoring to identify sources of specific toxic pollutants from commercial establishment, certain industries, specific activities, unique land uses, and other sources</p>	<p>Operating a sampling program to evaluate the effectiveness of implemented structural and non-structural BMPs, and to test the effectiveness of proposed new methods</p>	<p>Conduct a monitoring program, with participation of co-permittees, to identify locations of illegal practices, illicit connections and to eliminate such sources</p>	<p>Evaluate storm water impacts on selected receiving waters at a minimum to include multi-species toxicity testing, sediment quality measurements, and rapid bioassessments</p>	







AGENCIES CONTACTED FOR REPORTS ON BMP EFFECTIVENESS

CONTACT	REPORTS ON BMP EVALUATION	
	NO	YES
<b>FEDERAL:</b>		
Eugene Bromley, EPA Region IX	x	
<b>STATE (RWQCBs):</b>		
North Coast Region - John Hannum*		
San Francisco Region - Tom Mumley*		
Central Coast Region - Adam White	x	
Lahontan Region - John Short	x	Has possible lead to a report on street sweeping.
Santa Ana Region - Pavlova Vitale	x	
San Diego Region - Deborah Jayne*		
<b>LOCAL:</b>		
City of Los Angeles - David Talcott	x	
City of Sacramento - Elissa Callman		x Finalizing surveys conducted last year.
Alameda County - Robert Hale	x	
Fresno County - Doug Harrison	x	
Orange County - Richard Boon	x	
Riverside County - Jason Christie	x	
San Bernardino County - Ruben Montes	x	No available data
San Diego County - Bob Cain	x	
Santa Clara County - Keith Whitman	x	
Ventura County - Alex Sheydayi	x	

\* No reply



## Summary of Monitoring Objectives and Requirements

Documentation	Monitoring Objectives					Note	
	Estimate Annual Pollutant Loads	Monitor long-term trends	Identify sources of pollutants	Evaluate BMP effectiveness	Identify illicit/illegal discharge		Evaluate impacts on receiving water
<p>PROPOSED PHASE II &amp; III MONITORING PROGRAM 1/95</p>	<p>AN APPLICATION OF THE EPA'S "SIMPLE METHOD" LOADING MODEL HAS BEEN INSTALLED ON A DEDICATED PC USING GIS TECHNOLOGY. INPUT TO THE MODEL INCLUDES DRAINAGE AREA, SOIL TYPE, IMPERVIOUSNESS, RAINFALL AMOUNT, AND EVENT MEAN POLLUTANT CONCENTRATION.</p>	<p>BY THE END OF 1995, THERE WILL BE 24 AUTOMATIC MONITORING STATIONS SET UP THROUGHOUT THE COUNTY COLLECTING SAMPLES AND PROVIDING LONG-TERM TRENDS. WE ANTICIPATE THAT WE CAN BEGIN ANALYZING THESE TRENDS AFTER FIVE YEARS.</p>	<p>A PROGRAM TO DETERMINE THE EXTENT OF TOXIC IN STORM WATER RUNOFF FROM A COUNTY ROAD MAINTENANCE FACILITY BEGAN IN 1/95 AND COLLECTED SAMPLES FROM 5 STORMS. A LITERATURE SEARCH IS PRESENTLY BEING CONDUCTED TO IDENTIFY OTHER POSSIBLE SOURCES OF TOXICS IN RUNOFF. OTHER MONITORING PROGRAMS WILL THEN BE DESIGNED FOR THE START OF THE 95-96 STORM SEASON.</p>	<p>THROUGH USE OF A UNIFORM DATA COLLECTION FORMAT, THE DEPARTMENT BEGAN COLLECTING INFORMATION ON IMPLEMENTING 13 BASE LINE BMP'S IN 1/95. THIS INFORMATION WILL BE USED TO ASSESS THE EFFECTIVENESS OF THE BMP'S. THE DEPARTMENT HAS ALSO BEGUN WORKING WITH THE CO-PERMITTEES ON A SIMILAR DATA COLLECTION FORMAT FOR THEIR USE.</p>	<p>A SYSTEMATIC INSPECTION OF COUNTY-OWNED DRAINS IN PHASE I &amp; II BEGAN IN 12/94; PHASE III WILL BEGIN IN 1/96. INSPECTIONS WILL TAKE SET OPEN CHIMNELS FIRST, FOLLOWED BY UNDERGROUND STORM DRAINS. CO-PERMITTEES ARE RESPONSIBLE FOR INSPECTING THEIR OWN DRAINS.</p>	<p>IN 1995, THE DEPARTMENT WILL CONTRACT A CONSULTANT TO DEVELOP A PLAN TO STUDY THE IMPACTS FROM URBAN AND STORMWATER RUNOFF ON NEARLAND AND OCEAN WATERS.</p>	<p>SUBMITTED 1/12/95 to RWQCB</p>

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HARRY W. STONE, Director

**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

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P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE: WM-3

May 30, 1995

Dr. Robert P. Ghirelli  
Executive Officer  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

RECEIVED  
LOS ANGELES REGION  
MAY 31 11 14 AM '95

Dear Dr. Ghirelli:

**REVIEW OF REVISED PROGRAM MANAGEMENT CHAPTER FOR  
THE NEW NPDES STORMWATER PERMIT**

The Executive Advisory Committee (Committee) has reviewed the revised Program Management Chapter for the new NPDES Permit which was the subject of our Permit negotiating meeting with your staff on April 17, 1995. Enclosed is a copy of the Chapter which contains our proposed changes. Many of the changes are merely editorial in nature and do not change the substance of the Chapter.

The following Committee comments pertain to specific sections in the Chapter:

1. Section A.2.d. - This pertains to implementing watershed water quality monitoring programs. This item will need to be more clearly defined prior to the County agreeing to its inclusion under the Principal Permittee functions. We will be establishing the monitoring program requirements at one of our future negotiation meetings with your staff.
2. Section E.1 - Upon further discussion, the Committee concluded that membership in each of the Watershed Management Committees should be limited to agencies that are regulated by the Permit. As has been occurring under the current Permit, Permittee meetings are open and the public may attend and provide input on any issues that would be discussed by the Permittees.

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~~mechanism to support the storm water program.~~

~~l. Assume, on notice, any other responsibilities deemed necessary by the Executive Officer for the successful management of the storm water program; and.~~

m. Meet all the responsibilities outlined below for a Co-Permittee.

n. Acting as liaison between ~~all~~ <sup>the</sup> Permittees and the Regional Board on Permit issues.

**B. Co-Permittees**

1. The other cities and agencies are designated as Co-Permittees.

2. Each Co-Permittee ~~under the stormwater management plan~~ shall:

a. Participate in the development and amendment of the stormwater management plan;

b. Implement the stormwater management plan within their jurisdictional boundaries which includes the storm drainage system they own and operate;

c. Provide in a timely manner all information needed by the Principal Permittee for completing the annual reports;

~~d. Implement within their jurisdictional boundaries programs to monitor, identify and eliminate illegal connection/illegal discharges/illegal dumping.~~

**C. Agency Coordination**

~~1. The Principal Permittee and each Co-Permittee shall coordinate its storm water management activities with other agencies within their respective political jurisdiction (i.e., Public Works, Community Public Relations, Community Economic Redevelopment, etc...).~~

~~2. Each city Co-Permittee shall develop the institutional framework to address operation, maintenance, construction, redevelopment, and other activities performed by city agencies such as Public Works, Parks and Recreation, Planning, and Public Owned Treatment Works (POTWs). These city agencies shall need to participate in the planning and implementation of relevant Plan program areas.~~

*Each Permittee shall implement a framework to coordinate compliance and pollution prevention activities among each Permittee's internal departments and agencies (i.e. public works,*

*implementation of permit*

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planning, utilities, water supply, etc...).

D. Executive Advisory Committee

1. An area-wide Executive Advisory Committee (EAC) shall be established.

~~1. An area-wide Executive Advisory Committee (EAC) shall be established and shall consist of a representative of the County of Los Angeles as Chair and two representative Co-Permittees from each of the six watersheds.~~

~~2. The Co-Permittees shall select two (2) representatives to be on the EAC.~~

2. The EAC shall consist of a representative of the County of Los Angeles, City of Los Angeles, a representative from the Malibu Creek, Santa Clara, and Dominguez Channel Watershed Management Areas, and two representatives from the San Gabriel River, Los Angeles River, and the Ballona Creek Watershed Management Areas. The Co-Permittees shall select the representatives to be on the EAC.

One representative from the EAC shall chair the Watershed Management Committee for that Permittee's main watershed management area.

3. The Regional Board recognizes that the EAC assumes no responsibility for the adequacy or inadequacy of any individual Permittee's city's efforts and is not viewed as the responsible agency in this sense.
4. The EAC's main role is to facilitate programs within the six watershed and to enhance consistency among all of the programs.
5. Additional responsibilities of the EAC are:
  - a. Making recommendations on area-wide issues to each of the Watershed Management Committees;
  - b. Reviewing the stormwater management plans as developed by each Watershed Management Committee and provide direction and guidance on the plans for consideration by the Watershed Management Committees;
  - ~~c. Assessing the consistency of all area-wide BMPs;~~
  - d. Preparing and forwarding unified submittals to the Regional Board upon receipt of information and materials submitted by the Watershed Management Committee in compliance with Permit

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- d. Preparing the semi-annual progress reports and annual reports on Permit activities within the watershed for submittal to the Regional Board -- a draft of the annual report shall be circulated to each Co-Permittee and the Executive Advisory Committee for their review and comments prior to submittal to the Regional Board; and
- e. ~~Facilitating Enhancing~~ the implementation of this Order and the Stormwater Management Plan ~~within the Malibu Creek and Other Rural Areas among the Permittees in the watershed.~~

F. Watershed Management Subcommittees

- 1. Subcommittees will be established where needed as determined by the WMC and/or the EAC.
- 2. The Subcommittees will be focused on specific program areas and can provide more specific oversight on the development, implementation, and evaluation of selected program areas.
- 3. ~~The subcommittees shall be scheduled to meet on a routine basis.~~

G. Institutional Arrangements

- 1. The Principal Permittee and Co-Permittees shall be responsible for their agency's compliance with this Order
- 2. An implementation agreement shall be drafted formally detailing the responsibilities of the Principal Permittee and the Co-Permittees. The agreement would also address the funding of various watershed-wide activities such as plan development, annual evaluation and reporting, and monitoring.
- 3. As the Plan is more fully developed, the WMC shall coordinate with special agencies and districts that also regulate and/or perform activities addressed under different elements of the Plan. This coordination shall attempt to ensure that their functions and the Plan are compatible. ~~for~~ ~~of~~ ~~these~~ ~~agencies~~ ~~include:~~
  - a. ~~Hazardous Materials~~ ~~Any~~ ~~overlap~~ ~~of~~ ~~waste~~ ~~regulations,~~ ~~household~~ ~~hazardous~~ ~~waste~~ ~~programs~~ ~~and/or~~ ~~industrial~~ ~~inspections~~ ~~shall~~ ~~be~~ ~~recognized~~ ~~and~~ ~~addressed~~ ~~in~~ ~~reference~~ ~~to~~ ~~the~~ ~~watershed~~ ~~program.~~
  - b. ~~Health Departments~~ ~~Inspections~~ ~~of~~ ~~restaurants~~ ~~and~~ ~~other~~ ~~food~~ ~~handling~~ ~~establishments~~ ~~shall~~ ~~be~~ ~~coordinated~~ ~~with~~ ~~the~~ ~~Co-~~ ~~Permittees.~~

G2 may not be needed based on the level of specificity in this permit. Need to revisit upon completion of other permit chapters

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~~e. Transportation — Local municipalities have limited authority over motor vehicle usage and regional transportation planning. Where feasible, plan development and implementation will be coordinated with local transportation agencies.~~

~~d. Parks and Recreation — Landscape maintenance activities at public owned parks shall be reviewed as part of additional plan development to ensure the use of proper management measures.~~

~~e. Mosquito Abatement Districts — Coordination shall be done for mosquito abatement programs to avoid adverse impact on the quality of stormwater/urban runoff.~~

~~f. Water Districts — Activities with regards to the Water Districts activities shall be reviewed and, when feasible, comply with the watershed program regulations and requirements.~~

~~g. Fire Departments~~

~~h. Others — Other entities, both private and public which have major land holdings and/or authorities that impact the quality of stormwater/urban runoff shall be identified by the Co-Permittees for possible inclusion in this Order.~~

insert → H. Regional Board

I. H. Fiscal Resources

see attached sheet for language

Each Permittee shall develop a budget for implementing its portion of the Plan. A complete budget for the Plan shall be produced upon completion of development for all Plan components by December 1996. An annual budget shall be provided the Regional Board by July 15 of each year for the coming fiscal year. The budget shall provide information such as funding sources, staff resources, contract services, and cost sharing arrangements. The budgets shall ensure that there is adequate staff/training for storm water management programs.

~~The Principal Permittee and~~ Each Permittee shall submit an annual budget within 30 days after its adoption for implementation of the Plan. The budget shall be summarized and put into a format which ~~sets~~ identifies the necessary capital and operation and maintenance expenditures necessary to implement the storm water management program. The budget shall provide information such as funding sources, staff resources, equipment, support capabilities, contract services, and cost sharing arrangements. ~~The budgets shall ensure that there is adequate staff/training for storm water management programs.~~ Also included shall be a description of any funding shortfalls.

1. Area-Wide Resources - In implementing this Order and the Plan, the Permittees may elect to jointly fund a single program for certain BMPs, such as Public Education, that are area-wide in nature. Funding

H. Regional Board

Programs, including schedules for implementation developed under the terms of the Permit shall be submitted to the Executive Officer for approval. Programs shall be implemented upon approval by the Executive Officer. Within 45 days of program submittal, the Executive Officer shall respond with the results of the review of the program or its approval. Where no written response has been received by the Permittees within 45 days, the program submittal shall be deemed approved.

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agreements, including budgets and cost per agency, shall be developed.

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above

- 2. ~~City-Specific Resources - Each Permittee shall develop a budget detailing the cost of implementing this Order and Plan activities within its jurisdiction. Special funding in the form of grants, donations, or other forms of contribution should also be actively pursued to assist in funding special studies and/or BMPs.~~
- ? 3. ~~Coordinate the establishment of a regional reliable funding mechanism to support the storm water program;~~
- ? 4. ~~Provide the personnel or fiscal resources to perform an annual program audit, internal or externally directed, of the extent of compliance by all permittees in the stormwater program;~~

J X Legal Authority

- 1. ~~The legal authority that was required of each Permittee under Order No. 90-079 shall continue in effect.~~
- 2. ~~A plan for identifying any additional legal authorities needed by the Permittees shall be determined by July 1, 1995.~~
- 3. ~~By January 1, 1996, each Co-Permittee shall have the legal authority as specified under 40 CFR Section 122.26(d)(2)(i) and each Co-Permittee shall certify to the Regional Board by that date that it has satisfied the requirements of 40 CFR Section 122.26(d)(2)(i).~~
- 1 A. The Co-Permittees shall exercise their legal authority and require compliance with this Order and the Plan within its jurisdiction.
- 5. ~~Each Co-Permittee shall exercise its legal authority insuring that good housekeeping for all land uses be promoted and/or required.~~
- 6. ~~Additionally, the legal authority shall allow the Co-Permittees to:~~
  - a. ~~Enforce against illegal disposal and illicit connections;~~
  - b. ~~Require the control of construction site runoff with enforcement provisions; and~~
  - e. ~~Set requirements for upgrading storm water management at redevelopment sites.~~
- 2. Y Each Permittee shall certify that it has legal authority to control discharges to and from those portions of the storm drainage system over which it has jurisdiction. This legal authority may be a combination of statute, ordinance, permit, contract, order or inter-jurisdictional agreements between

permittees with adequate existing legal authority and shall, at a minimum, accomplish Items 1-6 below:

- a. Control the contribution of pollutants to the storm drainage system by storm water discharges associate with industrial activity and the quality of storm water discharged from sites of industrial activity;
- b. Prohibit illicit discharges to the storm drainage system;
- c. Control the discharge of spills and the dumping or disposal of materials other than storm water (e.g. industrial and commercial wastes, trash, debris, motor vehicle fluids, green waste, animal wastes, etc.) to the storm drainage system;
- d. Control through interagency or inter-jurisdictional agreements among permittees the contribution of pollutants from one portion of the storm drainage system to another;
- e. Require compliance with conditions in ordinances, permits, contracts or orders; and
- f. Carry out all inspection, surveillance and monitoring procedures necessary to determine compliance and noncompliance with permit conditions including the prohibition on illicit discharges to the storm drainage system.

*EAC needs to review checklist prior to agreeing to its inclusion.*

- 8. Each permittee's ~~legal counsel~~ <sup>its existing</sup> shall complete a review of the permittee's legal authority using, at minimum, the attached checklist entitled Municipal Storm Water Discharge Permit Legal Authority Checklist and Certification (attachment XXXXXX) and return to the Regional Board within 30 days of permit adoption along with copies of the legal authority.
- 9. Upon <sup>its</sup> completion of the legal authority review, each permittee's ~~legal counsel~~ <sup>provide a schedule for obtaining any identified additional legal authority</sup> shall demonstrate that legal authority has been obtained by the permittee. This direction is included within the EPA document Guidance Manual For The Preparation Of Part 2 Of The NPDES Permit Applications For Discharges from Municipal Separate Storm Sewer Systems, (EPA 833-B-92-002, November 1992); page 3-4.
- 10. The Permittees shall demonstrate compliance with the requirements of the previous permit (CA0061654) by December 31, 1995.
- 11. All violations of prior permit shall be violations of this permit. Compliance with these requirements does not release Permittees from their obligation to come into compliance with the requirements of the previous permit.
- 12. <sup>Each</sup> The Permittees legal authority shall require the use of Best Management





COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

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HARRY W. STONE, Director

QUALITY CONTROL BOARD  
LOS ANGELES REGION

IN REPLY PLEASE  
REFER TO FILE WM-3

May 25, 1995

Dr. Robert P. Ghirelli  
Executive Officer  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Dr. Ghirelli:

REVIEW OF REVISED ILLICIT DISCHARGE CHAPTER FOR  
THE NEW NPDES STORMWATER PERMIT

We have reviewed the revised Illicit Discharge Chapter for the new NPDES Permit which was the subject of our Permit negotiating meeting with your staff on May 1, 1995. Enclosed is a copy of the Chapter which contains our proposed changes. Our changes are based on our understanding of the modifications developed during the meeting. Minor comments are included directly on the enclosed copy.

If you have any questions regarding these comments, please contact Mr. Gary Hildebrand at (818) 458-5948, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Director of Public Works

*Donald L. Wolfe*  
DONALD L. WOLFE  
Deputy Director

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Enc.

cc: Executive Advisory Committee

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authorized under a separate NPDES permit. The permittees shall incorporate appropriate control measures in the storm water management program to ensure that "allowable" discharges are not significant sources of pollutants to waters of the state by January 15, 1996. (to be determined)

The EAC shall develop a consistent watershed-wide program including investigative standard procedures to eliminate illicit connections by \_\_\_\_\_

A. Illicit Connections

Each Discharger Permittee shall ~~develop~~ and implement a ~~comprehensive~~ program to identify and eliminate illicit connections by ~~December 1, 1995~~ (to be determined)

1. A consistent watershed-wide concept shall be developed using investigative standard procedures to investigate illicit connections to the storm drain system. Based on the results of field screening activities, or other appropriate information which indicates an area of reasonable potential of containing illicit connections, detection and follow up procedures shall be followed. Priority shall be established to initially focus on major problem areas and allow for a cost-effective approach to eliminate illegal connections or drains. This shall include high risk areas and industries such as those specified in Subchapter N of the Federal Regulations. Notification to the Regional Board of any illicit connection shall be an element of the investigative standard procedures.

What is a "high risk area"?

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2. The program developed by the Permittees to identify and eliminate illicit connections shall contain, at a minimum, the following:

a. Each Permittee shall develop and implement a schedule of storm drains for inspection for illicit connections within its jurisdiction.

i. Each Co-Permittee shall rank areas within the watershed to be inspected for illicit connections. This ranking of priority areas shall be completed by November 30, 1995.

b. A description of storm drain inspection procedures, illicit connection identification and elimination procedures.

ii. Field screening, map research, and land use investigation activities shall be done initially to identify potential problem areas. The program shall include ongoing field screening, using the methods required in 40 CFR §122.26 (d)(1)(iv), or alternative methods that have been approved by the Executive Officer. The field screening program shall focus on urbanized areas.

c. As part of the public education program efforts shall be undertaken to inform citizens about the problem of illicit discharges/dumping.

iii. Public outreach efforts shall be undertaken to inform citizens in the area about the problem.

d. Necessary enforcement action shall be taken to terminate such illicit connections. The EAC shall develop standard enforcement procedures.

our records show these being removed

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discharge can be traced to a particular facility, the facility shall be investigated to identify where exactly the pollutants are coming from and to stop the discharge.

- vi. ~~All open channels shall be inspected for evidence of illegal discharges by January 1, 1996. The open channel inspections shall also collect information on dry weather discharges from underground drains for use in prioritizing future underground drain inspections.~~

c. Public Reports

- i. ~~The Co Permittees shall continue to operate a "hotline" 800 telephone number for the public to call and report illicit connections.~~

~~B. Recording System~~

3. ~~Reporting System~~

- implementation*
3. The Co-Permittees shall implement a consistent *program by* record keeping recording system to track the ~~report~~ of illegal connections *by December 1, 1995.* If the spill/dumping is within an unincorporated area or within a contract city, the County shall go out and commence clean up. If it is within an incorporated city, the City is responsible for cleanup and the City shall then advise the County about sufficient cleanup.

~~C. Public Outreach~~

4. ~~Public Outreach~~

- move to pipp-->
- 1. ~~The Permittees shall develop an area wide educational and reporting system along with prompt response procedures by December 1995. An education program shall be aimed at residents, businesses, industries, and employees of the permittee whose job functions/daily lives may impact storm water quality. An education program may be developed locally or regionally. The program shall include at a minimum:~~
    - i. ~~Education on proper use and disposal of pesticides, herbicides and fertilizers;~~
    - ii. ~~Training of construction contractors and developers on developing stormwater site plans and BMPs for construction activities;~~
    - iii. ~~Efforts to explain the definition and impacts, and promote removal of illicit discharges; and~~
    - iv. ~~Activities to explain and promote proper management and~~

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**Permittee.**

2.

Such response shall include investigation, containment, and cleanup activities as appropriate.

The EAC shall develop procedures for spill response. *In responding to* Should a sewage spill occur ~~to the storm drainage system~~, the Permittees shall not ~~disinfect the spill to the system~~ if the spill has already flowed downstream. Disinfection of the outside area shall occur that has come in contact with the spill and shall not result in a disinfection discharge to the storm drain system if technologically preventable.

*to the extent feasible, shall not  
any disinfection agent used during  
the spill response activity from being  
discharged into the storm drain  
system.*

- ~~1. The cleanup and disposal of hazardous materials substances will be by the Health Hazardous Materials Division of the Los Angeles County Fire Department or other local hazardous materials agency to be identified by the Permittees.~~
- ~~2. For non hazardous substances materials, the local agencies shall coordinate cleanup and disposal and shall attempt to identify and prosecute the violators. Cooperation among all agencies will be needed to allow for prompt action and joint effort to deter such violators.~~
- ~~3. All Co Permittees shall have local authority against illegal dumping activities.~~

F. Complaint Response

**4. Complaint Response**

All Co Permittees shall establish a complaint response procedure by August 15, 1995. A quarterly summary shall be submitted to the Regional Board for information purposes.

*reporting*

The Permittees shall implement a complaint response procedure by August 15, 1995. A quarterly summary of calls shall be submitted to the Regional Board for information purposes. This shall include a brief description of the incident; what was spilled/dumped; quantity; what remedial action was taken; and what happened to the discharger/dumper.

G. Coordination of Alternative Disposal

**5. Coordination of Alternative Disposal**

- ~~1. By January 1, 1996, the Co Permittees shall establish a public outreach program that will regularly inform the public of the locations and/or schedules for Household Hazardous Waste collection programs that the Co Permittees shall implement. The Permittees shall also encourage the proper disposal of materials from industrial and commercial areas.~~

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~~2. The Co-Permittees shall continue to encourage the proper disposal of Household Hazardous Wastes and the recycling of oil, antifreeze, glass, plastic, and other materials to prevent the improper disposal of such materials to the storm drainage system.~~

H. Reporting

~~Incidents involving a hazardous material entering the storm drain system are to be reported by the responsible party, or, if not known, the responding agency, to the Regional Board. Complaints received through the County wide or local city hotlines shall be tracked and reported to the Regional Board.~~

6. Reporting

The permittees shall develop and implement a program to promote, publicize, and facilitate public reporting of illicit discharges of water quality impacts associated with discharges from the storm drainage system. The program shall inform the public about what to look for and how to report incidents. The program shall also enhance public awareness of the problems associated with illicit discharges and may include programs such as educating school students, using inserts in utility bills, public service announcements in newspaper, on television, or on radio and occasional public workshops.

Incidents involving a hazardous substance entering the storm drainage system are to be reported by the responsible party, or, if not known, the responding agency, to the Regional Board and State of California Office of Emergency Services (OES) at (800) \_\_\_\_\_ and the Federal Hazardous Response Number at (800) \_\_\_\_\_. Reports received through the County-wide or local city hotlines shall be ~~tracked and reported to the Regional Board.~~ *documented and reported as described below.*

The Permittees shall implement a complaint response procedure by ~~August 15, 1995.~~ *to be determined* A quarterly summary of calls shall be submitted to the Regional Board for information purposes. This shall include: a brief description of the incident; what was spilled/dumped; quantity; what remedial action was taken; and what happened to the discharger/dumper.

*to be discussed under Public Education Chapter according to our records*

1. By January 1, 1996, the Co-Permittees shall establish a public outreach program that will regularly inform the public of the locations and/or schedules for Household Hazardous Waste collection programs that the Co-Permittees shall implement. The Permittees shall also encourage the proper disposal of materials from industrial and commercial areas.

The Co-Permittees shall continue to encourage the proper disposal of Household Hazardous Wastes and the recycling of oil, antifreeze, glass, plastic, and other materials to prevent the improper disposal of such materials to the storm drainage system.

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1. Enforcement

~~Each Co-Permittee shall take enforcement actions against illegal dumping through state laws and local ordinances. The enforcement actions shall be taken by municipal agents by issue citations, notice of violations, cease and desist orders, or even make arrests depends on the type of violation and the code provisions that they are enforcing. A review of the various enforcement tools used by the Permittees shall be performed by the Principal Permittee.~~

C. Enforcement Procedures

change language ~~Co-Permittees shall take enforcement actions against illicit discharges/disposal/dumping through state laws and local ordinances, etc. The enforcement actions shall be taken by municipal agents by issuing citations, notices of violation, cease and desist orders, or even making arrests depending upon the type of violation and the code provisions that they are enforcing. A review of the various enforcement tools used by the Permittees shall be performed by the EAC or WMC for consistency among Permittees. The enforcement procedures shall be consistent on an area-wide basis.~~

*our records show this being deleted*

1. Coordination With State Non-stormwater Permits  
D. Coordination With State Non-stormwater Permits

1. Quarterly, the ~~Principal Permittee~~ <sup>Regional Board</sup> shall ~~obtain~~ <sup>provide the Principal Permittee</sup> an updated list of NPDES Permits issued by the Regional Board ~~in order to characterize the nature~~ <sup>for use</sup> of the existing non-storm discharges in the receiving waters within the watershed. This will help in determining unexpected discharge during dry weather and to allow enforcement actions to focus on illicit ~~illegal~~ dumping activities.

*in determining the source*

2. The Principal Permittee shall coordinate with other environmental agencies to ensure that requirements imposed by these agencies do not conflict with stormwater regulations or goals. Requirements of many agencies ~~do~~ complement stormwater regulations. Coordination with these agencies will help minimize overlapping investigations and result in a more efficient use of resources. Any conflict in requirements of other environmental programs/agencies must be reported immediately to the Regional Board for coordination ~~making as to which one should take precedence~~. A watershed wide concept shall be developed by December 1, 1995. These agencies, include but are not limited to:

*our records show this being deleted.*

*regulatory*

The Permittees shall coordinate with other agencies and report and make recommendations ~~on suggested resolutions~~ <sup>for</sup> ~~in regards to~~ any conflicts which are identified between the provisions of this permit and the requirements of other regulatory agencies to the Regional Board. These agencies include but are not limited to:

- a. California Department of Fish and Game
- b. California Department of Toxic Substances Control

*to the Regional Board*

- c. California Coastal Commission
- d. United States Environmental Protection Agency

~~K. Identification of Permissible/Permittable Discharges~~

~~E. Identification of Permissible/Permittable Discharges~~

~~By December 1, 1995, a list of non-storm water discharges that can be allowed to discharge into the Waters of the State shall be developed by the Executive Advisory Committee and submitted to the Regional Board for approval by the Executive Officer. This list shall contain non-storm water discharges and preferred/required methods for disposal and a justification of why the particular discharges should or should not be allowed.~~

~~L. Appropriate Management Practices~~

F. ~~Appropriate Management Practices~~

*our records show this being deleted.*

~~The Co-Permittees shall develop BMPs for watershed-wide implementation. These BMPs shall include but not be limited to waste management from horse riding areas, and livestock stabling and corral areas.~~

G. **Reporting**

The Permittees shall report non-compliance by any non-storm water discharge permittee to the Regional Board.

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May 18, 1995

TO: All Phase III Co-Permittees

FROM: Frank Kuo  
Los Angeles County Department of Public Works

**NPDES LEGAL NOTICE**

Enclosed is a copy of a legal notice announcing the availability of the "Additional Best Management Practices (BMPs) plan" for public review. The notice will be published on Sunday, May 21, 1995 in the L.A. Daily News newspaper.

Should you have any questions or comments, please call me at (818) 458-6989.

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COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

HARRY W. STONE, Director

May 3, 1995

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

Mr. Robert P. Ghirelli  
Executive Officer  
California Regional Water  
Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

IN REPLY PLEASE  
REFER TO FILE WM-0

Dear Mr. Ghirelli:

**RETURN OF APPLICATION FEE FOR STORMWATER PERMIT RENEWAL**

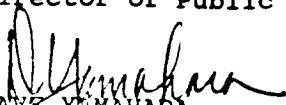
On October 17, 1995, the State Water Resources Control Board returned County of Los Angeles Warrant No. 1131014 for \$10,000 to this Department. The warrant had been issued to your agency in response to your January 4, 1995 letter and subsequent discussions with your staff regarding the appropriate amount as application fee for the renewal of NPDES Permit No. CA0061654. In its cover letter (copy attached), the State Water Resources Control Board specified that an application fee for the renewal of the NPDES Permit is not required at this time. The State Water Resources Control Board also indicated in their letter that the renewal fee need not be submitted until the discharger has received notice of the fee. This notification is expected to occur in October 1995. It is our understanding that this issue has been discussed with your staff and that they concur with the stated policy of the State Water Resources Control Board.

Based upon this information, we will be submitting the \$10,000 application fee following receipt of the above-specified notice.

Should there be additional information concerning these issues, we would appreciate notification as soon as possible. Please contact Mr. Brian Hooper, of my staff, at (818) 458-5118, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Director of Public Works

  
DAVE YAMAHARA  
Assistant Deputy Director  
Waste Management Division

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# COUNTY OF LOS ANGELES

PAYABLE THROUGH:  
FIRST UNION NATIONAL BANK  
CHAPEL HILL NORTH CAROLINA  
IN COOPERATION WITH BANK OF AMERICA  
THE TREASURER OF THE COUNTY OF LOS ANGELES  
WILL PAY TO THE ORDER OF: \_\_\_\_\_

CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
C/O DEPT. OF PUBLIC WORKS  
ATT.: NANCY COSTABILE  
(818) 458-6556

## G 1131014

AUDITOR CONTROLLER'S GENERAL WARRANT  
WARRANT CLEARANCE FUND - LOS ANGELES, CALIFORNIA

NOT PAYABLE AFTER TWO YEARS FROM DATE ISSUED 66-15C  
531



ISSUE DATE 031595 WARRANT NO 1131014

DOLLARS	CENTS
\$10,0000	

APPROVED

MARK H. BLOODGG AUDITOR-CONTROLLER  
BY \_\_\_\_\_

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Mr. Kenneth M. Graham  
Page 2

If you should have any questions or comments please call me at (213) 266-7515 or have your staff contact Carlos Urrunaga at (213) 266-7598.

*Catherine Tyrrell*  
CATHERINE TYRRELL  
Assistant Executive Officer  
Surface Water Programs

attachment

cc: Jorge León, Office of Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency, Region 9  
Executive Advisory Committee

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HARRY W. STONE, Director

**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

ADDRESS ALL CORRESPONDENCE TO:  
P O BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE WM-3

March 15, 1995

Dr. Robert P. Ghirelli  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Attention Mark Pumford

Dear Dr. Ghirelli:

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
PERMIT NO. CA0061654, CI 6948, BOARD ORDER NO. 90-079  
ACTION ITEM PROGRESS REPORT**

In accordance with our agreement with you, as specified in our September 22, 1994 letter, we are reporting our progress in completing the monitoring program action items. This letter is the last of our agreed upon monthly status reports.

- a. Render operational an initial monitoring network of nine stations to establish long-term trends in stormwater quality in the Santa Monica Bay Drainage Basin. Seven stations are to be made operational by November 15, 1994, and two by January 1, 1995.

Status: An operating history of our nine automated sampling stations is attached.

Each station is comprised of state-of-the-art sampling equipment which has been custom modified to meet the unique conditions of our storm drain system. To the best of our knowledge, we are the first agency to attempt to put in place such a system utilizing special equipment for stormwater sampling. Each site has been initially programmed during dry weather with uniform flow, if any, and under stable conditions. These sites are currently being tested during the often turbulent and rapidly changing conditions that occur during storm events. During this storm season, we have been observing and evaluating the performance of the sampling equipment so that the equipment configuration and programming can be adjusted to best collect the needed samples.

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Dr. Robert P. Ghirelli  
March 15, 1995  
Page 3

Status: Inspection reports for December 1994 and January and February 1995 are attached.

- f. Advertise a Request for Proposal to develop a program to evaluate stormwater impacts on selected receiving waters including conducting toxicity studies in the Santa Monica Bay Drainage Basin.

Status: Five proposals were received from bidders on February 1, 1995. We will be contacting you soon about the funding of this study.

- g. Submit a revised monitoring program for Phases II and III that includes all program elements with timelines for development and implementation.

Status: The revised monitoring plan was submitted to you January 12, 1995. We are awaiting your approval.

As previously stated in our January 12, 1995 letter to you, if installation and operation of the 15 monitoring stations in Phases II and III are required by October 1995, the start of the next rainy season, we will need to begin detailed design of these sites immediately. As requested by Mark Pumford, we gave a presentation of our proposed monitoring program and the 15 proposed Phase II and III site locations to the Technical Advisory Committee of the Santa Monica Bay Restoration Project on March 9, 1995 to satisfy his desire for public input on the program. The Committee was given until March 13, 1995 to submit comments, after which time, if we hear nothing further from you, we will proceed with the construction of 12 out of 15 sites as we proposed.

Mr. Pumford desires to conduct further discussions on the appropriateness of the Rio Hondo, San Gabriel River, and the Los Angeles River at Tujunga Avenue sites. He also wishes to pursue discussions on coordinating stormwater monitoring in these three watersheds with other point source dischargers. We informed him that though we are most willing to discuss these three sites further, doing so would in all likelihood delay installation of these sites until after the start of the 1995-96 rainy season. Mr. Pumford acknowledged this possibility.

Finally, we would also like you to review the alternative sites listed in our monitoring proposal. These alternatives would be substituted for sites that might develop unforeseen delays.

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Dr. Robert P. Ghirelli  
March 15, 1995  
Page 4

If you have any questions regarding this matter, please contact the undersigned at (818) 458-3500, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Director of Public Works

  
DAVID YAMAHARA  
Assistant Deputy Director  
Waste-Management Division

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AUTOMATED MONITORING STATIONS  
OPERATING HISTORY  
(3/15/95)

STATION	HISTORY	PRESENT STATUS
Ballona Creek	<p>Installed 3/94.  Storm of 12/24/94: No composite collected due to power malfunction.  Storm of 1/3/95: Composite samples collected and taken to lab on 1/5/95.  Storm of 1/10/95: Composite sample collected and taken to lab on 1/13/95.  Storm of 1/23/95: No composite sample collected due to clogged tubing. Tubing cleared subsequently.  Storm of 2/14/95: Composite sample collected and taken to Lab.  Storm of 3/3/95: No composite sample collected due to malfunction; subsequently corrected.  Storm of 3/10/95: Composite sample collected and taken to Lab.</p>	Operational
Malibu Creek	<p>Installed 10/94  Storm of 12/24/94: Composite sample not collected due to probable clogged tubing.  Storm of 1/3/95: Composite sample collected and taken to Lab on 1/9/95.  Storm of 1/10/95: Severe flooding in area prohibited inspection of station until 1/19/95. Evidence showed that auxiliary pump was submerged for considerable time and not currently operating.  Storm of 1/23/95: No composite sample collected due to damaged pump.  Storm of 2/14/95: No composite sample collected due to damaged pump. Pump replaced the week of 2/27/95.  Storm of 3/3/95: No composite sample collected due to switch not correctly set; subsequently corrected.  Storm of 3/10/95: No composite sample collected due to local power failure involving road repair, which erased program memory.</p>	Reprogramming the week of 3/13/95.

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STATION	HISTORY	PRESENT STATUS
Trancas Creek	<p>Installed 7/94  Storm of 12/24/94: No appreciable runoff.  Storm of 1/3/95: Composite sample collected and taken to Lab on 1/9/95.  Storm of 1/10/95: No composite sample collected due to clogged tubing.  Storm of 1/23/95: No composite sample collected due to clogged tubing; subsequently cleared.  Storm of 2/14/95: Composite sample collected and taken to the Lab.  Storm of 3/3/95: No composite sample collected due to clogged tubing; subsequently cleared.  Storm of 3/10/95: No composite sample collected due to clogged tubing.</p>	<p>Not operating.  Tubing will be cleared out the week of 3/13/95.</p>
Kenter Drain	<p>Installed 7/94  Storm of 12/24/94: Composite samples not collected due to clogged tubing. Tubing cleared 12/27.  Storm of 1/3/95: Composite samples collected and taken to Lab on 1/9/95.  Storm of 1/10/95: No composite sample collected due to disconnected tubing. Tubing reconnected 2/3/95.  Storm of 1/23/95: No composite sample collected due to clogged tubing; subsequently cleared.  Storm of 2/14/95: No composite sample collected due to clogged tubing; subsequently cleared.  Storm of 3/3/95: Composite sample collected and taken to Lab.  Storm of 3/10/95: Composite sample collected and taken to Lab, but tubing clogged toward end of sampling.</p>	<p>Not operating.  Tubing will be cleared out the week of 3/13/95.</p>
D2361 - Los Angeles	<p>Installed 11/94  Storm of 12/24/94: Composite sample collected and taken to Lab.  Storm of 1/3/95: Composite sample collected and taken to Lab.  Storm of 1/10/95: Composite sample collected and taken to Lab.  Storm of 1/23/95: Composite sample collected and taken to Lab.  Storm of 2/14/95: Composite sample collected and taken to Lab.  Storm of 3/3/95: Composite sample collected, but not taken to Lab due to human error.  Storm of 3/10/95: Composite sample collected and taken to Lab.</p>	<p>Operational.</p>

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ILLICIT DISCHARGE INSPECTION REPORT

REPORTING PERIOD February 1995

OPEN CHANNEL	AREA INSPECTED		ILLICIT DISCHARGE	
	FROM	TO	NUMBER OBSERVED	COMMENTS
Flint Canyon Channel	Woodleigh Lane crossing		2*	2 sites: residential properties discharging possible yard drainage, pool filter backwash, and or gray water.
Winery Canyon Channel	Alta Park Lane crossing		3*	3 sites: residential properties discharging possible yard drainage and/or gray water.
Gould Canyon Channel	Gould Avenue crossing		4*	4 sites: residential properties discharging possible yard drainage and/or gray water.
Aliso Creek	—	—	Follow-up to December Reporting Period	1 site: located within the City of Los Angeles, referred to the City of Los Angeles Storm Management Division (LASMD). LASMD is conducting an ongoing investigation of referral.
Upper Los Angeles River	—	—	Follow-up to December Reporting Period.	1 site: ongoing, joint investigation with LASMD, LACDPW and LAC Fire HAZMAT. Site investigation conducted discussing findings with the City of Los Angeles, City Attorney.
Santa Susana Channel	—	—	Follow-up to December Reporting Period	3 sites: located within the City of Los Angeles referred to LASMD. LASMD is conducting an ongoing investigation of referrals.
Coldwater & Higgins Channels	Full	Reach	—	NONE.
Santa Monica Channel	Full	Reach	—	NONE.
Mandeville Canyon Channel	Full	Reach	—	NONE.
Rivas Canyon Channel	Full	Reach	—	NONE.
Sullivan Canyon Channel	Full	Reach	—	NONE.
Parker-Mesa Drive Channel	Full	Reach	—	NONE.

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\*LACDPW is conducting an area-wide investigation. Upon completion of investigation and analysis of findings; the CRWQCB and the City of La Canada Flintridge will be contacted to determine appropriate steps in order to eliminate any illicit discharges.

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ILLCIT DISCHARGE INSPECTION REPORT

REPORTING PERIOD January 1995

OPEN CHANNEL	AREA INSPECTED		ILLCIT DISCHARGE	
	FROM	TO	NUMBER OBSERVED	COMMENTS
Seputveda Channel	Full	Reach	—	NONE
Sawtelle Channel	Full	Reach	—	NONE
Centinela Creek	Full	Reach	—	NONE
Benedict Canyon	Full	Reach	—	NONE
Rexford Channel	Full	Reach	—	NONE

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ILLICIT DISCHARGE INSPECTION REPORT

REPORTING PERIOD December 1994

OPEN CHANNEL	AREA INSPECTED		ILLICIT DISCHARGE	
	FROM	TO	NUMBER OBSERVED	COMMENTS
Ballona Creek	Dunsmuir Ave City of Los Angeles	405 FWY	1	1 - Oil sheen entering channel from City of Los Angeles Drain referred to City of Los Angeles Storm Management Division (LASMD)
Pacoima Wash	Glenoaks Blvd	5th Street	2	2 - Sites issued notices to cease discharge and conduct site assessment/remediation.
Upper Los Angeles River	Station 660+00	Station 948+00	3	2 - Sites located within City of Los Angeles. Referred to LASMD. 1 - Site on going, joint investigation with LASMD, LACDPW, and LACoFire HAZMAT.
Atiso Creek	Full	Reach	2	1 - Site located within City of Los Angeles Joint Inspection conducted (LASMD and LACDPW) illicit discharge resolved. 1 - Site located within City of Los Angeles, referred to LASMD.
Burbank Western	Full	Reach	6	1 - Site located within City of Burbank, referred to City of Burbank, City obtained compliance. 5 - Sites, compliance obtained in field by LACDPW.
Tujunga Wash	Station 2+00	Station 146+00	—	NONE
Tujunga Wash	Station 146+00	Station 499+00	—	NONE
Santa Susana Creek	Station 41+00	Station 200+00	4	1 - Site, search warrant served jointly by City of L.A. Bureau of Sanitation, LACoFire HAZMAT, and LACDPW. 3 - Sites located within City of Los Angeles referred to LASMD.

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ILLICIT DISCHARGE INSPECTION REPORT

REPORTING PERIOD December 1994

OPEN CHANNEL	AREA INSPECTED		ILLICIT DISCHARGE	
	FROM	TO	NUMBER OBSERVED	COMMENTS
Wilbur Creek	Full	Reach	—	NONE
East Canyon Channel	Station 70+50	—	1	1 - Site located within City of Los Angeles. Joint inspection conducted (LASMD and LACDPW) illicit discharge resolved.

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**STATUS OF YEAR 3 ACTIVITIES FOR PHASE II AGENCIES**  
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Dead-line	Activities	Alhambra	Arcadia	Azusa	Baldwin Park	Bradbury	Burbank	Calabasas	Caltex	Claremont	Covina
May 31 1995	Evidence of Progress for Early Action & Additional BMPs for Illegal Discharges & Disposal Practices							NA			
	Evidence of Progress for Early Action & Additional BMPs for Construction Sites							NA			
	Evidence of Progress for Early Action & Additional BMPs for Residential, Commercial, & Industrial							NA			

Dead-line	Activities	Diamond Bar	Duarte	El Monte	Glendale	Glendora	Hidden Hills	Industry	Irwindale	La Canada Flintridge	La Habra
May 31 1995	Evidence of Progress for Early Action & Additional BMPs for Illegal Discharges & Disposal Practices										
	Evidence of Progress for Early Action & Additional BMPs for Construction Sites										
	Evidence of Progress for Early Action & Additional BMPs for Residential, Commercial, & Industrial										

Dead-line	Activities	La Puente	La Verne	Los Angeles	Monrovia	Montebello	Monterey Park	Pasadena	Pomona	Rosemead	San Dimas
May 31 1995	Evidence of Progress for Early Action & Additional BMPs for Illegal Discharges & Disposal Practices										
	Evidence of Progress for Early Action & Additional BMPs for Construction Sites										
	Evidence of Progress for Early Action & Additional BMPs for Residential, Commercial, & Industrial										

Dead-line	Activities	San Fernando	San Gabriel	San Marino	Sierra Madre	South El Monte	South Pasadena	Temple City	Walnut	West Covina
May 31 1995	Evidence of Progress for Early Action & Additional BMPs for Illegal Discharges & Disposal Practices									
	Evidence of Progress for Early Action & Additional BMPs for Construction Sites									
	Evidence of Progress for Early Action & Additional BMPs for Residential, Commercial, & Industrial									

NA - Not applicable or agency approved by CRRDCB to be covered under other phases

\*\* - Late for countywide publication

Data Received  
 Data Determined Acceptable As to Form

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES

as of: January 3, 1995

Dead- lines	Activities	Alhambra	Arcadia	Azusa	Baldwin Park	Badbury	Burbank	Calabasas	Caltrans	Claremont	Covina	Diamond Bar	Duarte	El Monte
Sept 30 1992	Submission of Existing Rainfall Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/09/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92
	Submission of Existing Flow Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/08/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92
	Submission of Existing Water Quality Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	12/02/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92
	Alignment of Stormdrain	10/30/92	11/02/92	10/29/92	09/27/92	11/01/92	04/07/93	NA	09/24/93	07/14/92	10/28/92	10/29/92	10/29/92	10/28/92
Oct 30 1992	Identification of Natural Drainage Watercourses	11/02/92	11/02/92	11/02/92	09/16/92	11/03/92	03/05/93	NA		09/15/92	10/27/92	11/02/92	11/02/92	10/28/92
	Identification of Private Drainage Systems	12/15/92	11/02/92	11/02/92	09/27/92	11/01/92	03/05/93	NA	09/24/93	07/14/92	10/28/92	10/29/92	11/04/92	10/28/92
	Definition of Drainage Boundaries	11/02/92	11/02/92	11/02/92	09/27/92	11/01/92	03/05/93	NA	09/24/93	07/14/92	10/28/92	10/29/92	11/04/92	10/28/92
	Determination of Existing BMPs for Construction Sites	12/01/92	12/01/92	11/30/92	12/03/92	12/01/92	03/05/94	NA	12/01/93	09/02/92	12/01/92	12/01/92	11/18/92	12/01/92
Nov 30 1992	Existing BMPs for Illegal Discharge & Disposal Practices	12/01/92	12/01/92	11/30/92	12/03/92	12/01/92	03/03/93	NA	12/01/93	09/02/92	11/30/92	12/01/92	11/17/92	11/30/92
	Existing BMPs for Residential, Commercial, & Industrial	12/01/92	12/01/92	11/30/92	12/03/92	12/01/92	03/03/93	NA	12/01/93	09/02/92	11/30/92	12/01/92	11/17/92	11/30/92
	Identification of Waste Disposal Facilities	02/01/93	01/28/93	02/03/93	09/27/92	11/02/92	09/04/93	NA	10/14/92	07/14/92	01/28/93	01/19/93	09/17/92	01/23/93
	Identification of Industries by SIC Code	02/17/93	03/01/93	11/30/92	02/17/93	11/09/93	10/04/93	NA	NA	02/08/93	03/04/93	03/29/93	03/11/93	03/22/93
Apr 1 1993	Development of Early Action TWP Plan	03/31/93	04/01/93	04/01/93	02/23/93	04/01/93		NA	09/21/94 **	03/24/93	03/24/93	03/29/93	03/31/93	03/22/93
	Submission of Signature Block	04/22/93	04/22/93	04/22/93	04/12/93	04/26/93	04/26/93	NA	NA	04/20/93	04/18/93	04/15/93	04/22/93	04/14/93
May 13 1993	Required Legal Authority for Regulation of Stormwater/Urban Runoff	09/13/93	09/18/93	09/05/93	09/18/93		09/04/93	NA	09/29/94 **	09/01/93	09/11/93	09/11/93	09/18/93	09/04/93
	Stormwater Permit Implementation Agreement	09/13/93	09/23/93	09/13/93	09/24/93	09/02/93	09/22/93	NA	NA	09/01/93	09/11/93	09/08/93	09/18/93	09/17/93
		09/17/93	09/23/93	09/17/93	09/24/93	09/02/93	09/22/93	NA	NA	09/08/93	09/11/93	09/10/93	09/20/93	09/17/93

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES

as of: January 3, 1995

Dead- lines	Activities	Glendale	Glendora	Hidden Hills	Industry	Inlandia	La Canada Flintridge	La Habra Heighta	La Puente	La Verne	Los Angeles	Monrovia	Montebello	Monterey Park	
Sept 30 1992	Submission of Existing Rainfall Data	09/09/92	09/27/92	10/08/92	07/30/92	10/07/92	09/30/92	09/23/92	02/04/93	09/14/92	09/27/91	09/17/92	09/14/92	09/14/92	
	Submission of Existing Flow Data	09/14/92	09/02/92	10/08/92	09/06/92	10/07/92	09/30/92	09/24/92	02/08/93	09/14/92	10/05/92	09/20/92	09/14/92	09/14/92	
	Submission of Existing Water Quality Data	09/14/92	09/27/92	10/08/92	07/30/92	10/07/92	09/30/92	09/23/92	02/04/93	09/14/92	09/30/92	09/17/92	09/14/92	09/14/92	
		09/14/92	09/02/92	10/08/92	09/06/92	10/07/92	09/30/92	09/24/92	02/08/93	09/14/92	10/05/92	09/20/92	09/14/92	09/14/92	09/14/92
		09/14/92	09/27/92	10/08/92	07/30/92	10/07/92	09/30/92	09/23/92	02/04/93	09/14/92	09/30/92	09/17/92	09/14/92	09/14/92	09/14/92
Oct 30 1992	Alignment of Stormdrain	09/13/92	11/02/92	11/03/92	10/28/92	12/15/93	11/03/92	10/29/92	02/17/93	11/23/92	10/28/92	10/28/92	10/28/92	11/02/92	
	Identification of Natural Drainage Watercourses	11/03/92	11/03/92	11/03/92	11/03/92	12/15/93	11/03/92	11/03/92	03/02/93	11/23/92	10/28/92	10/27/92	10/27/92	11/03/92	
	Identification of Private Drainage Systems	09/13/92	11/01/92	11/03/92	11/25/92	12/15/93	12/03/92	11/03/92	03/02/93	11/23/92	10/28/92	10/28/92	11/04/92	11/02/92	
	Definition of Drainage Boundaries	11/03/92	11/03/92	11/03/92	11/03/92	12/15/93	11/03/92	11/03/92	03/02/93	11/23/92	10/28/92	10/27/92	10/27/92	11/02/92	
		11/03/92	11/03/92	11/03/92	11/03/92	12/15/93	11/03/92	11/03/92	03/02/93	11/23/92	10/28/92	10/27/92	10/27/92	11/02/92	
Nov 30 1992	Determination of Existing BMPs for Construction Sites	11/30/92	11/30/92	11/30/92	11/25/92	12/30/93	02/03/93	12/01/92	02/17/93	12/02/92	03/13/90	11/28/92	11/30/92	11/30/92	
	Existing BMPs for Illegal Discharge & Disposal Practices	12/01/92	12/01/92	12/01/92	11/30/92	12/30/93	01/04/93	12/01/92	03/02/93	12/02/92	10/19/92	11/25/92	12/01/92	12/01/92	
	Existing BMPs for Residential, Commercial, & Industrial	11/30/92	11/30/92	11/30/92	11/25/92	12/30/93	01/04/93	12/01/92	02/17/93	12/02/92	03/13/90	11/28/92	11/30/92	11/30/92	
		12/01/92	12/01/92	12/01/92	11/30/92	12/30/93	01/04/93	12/01/92	03/02/93	12/02/92	10/19/92	11/25/92	12/01/92	12/01/92	
Feb 1 1993	Identification of Waste Disposal Facilities	02/18/93	01/25/93	11/03/92	01/18/93	05/25/94	02/03/93	09/23/92	02/04/93	12/07/92	07/30/92	02/02/93	01/27/93	03/06/93	
		02/18/93	01/25/93	11/03/92	02/18/93	05/25/94	02/03/93	10/30/92	02/06/93	02/04/93	10/18/92	04/05/93	01/27/93	03/06/93	
Mar 1 1993	Identification of Industries by SIC Code	02/03/93	01/25/93	05/11/93	02/22/93	10/03/94 **	02/03/93	12/02/92	02/04/93	03/08/93	12/08/92	10/28/92	01/27/93	03/06/93	
		12/14/93	01/27/93	05/11/93	03/07/93	10/03/94 **	02/03/93	12/03/92	02/06/93	03/10/93	12/08/92	10/27/92	01/27/93	03/06/93	
Apr 1 1993	Development of Early Action BMP Plan	04/12/93	03/29/93	04/05/93	04/07/93	12/29/94 **	04/08/93	03/31/93	03/31/93	03/30/93	04/05/93	04/05/93	04/07/93	04/22/93	
		04/13/93	03/29/93	04/05/93	04/07/93	12/29/94 **	04/09/93	04/01/93	04/01/93	03/31/93	04/05/93	04/05/93	04/07/93	04/22/93	
Apr 19 1993	Submission of Signature Block	04/22/93	04/22/93	04/28/93	04/28/93	12/29/94 **	04/28/93	04/12/93	04/12/93	04/20/93		04/22/93	04/19/93	04/22/93	
		04/22/93	04/22/93	04/28/93	04/28/93	12/29/94 **	04/28/93	04/12/93	04/12/93	04/20/93		04/22/93	04/19/93	04/22/93	
May 13 1993	Required Legal Authority for Regulation of Stormwater/Urban Runoff	09/08/94 **	07/12/93	05/18/93	05/12/93	12/29/94 **	09/23/93	04/28/93	04/28/93	05/18/93	09/30/91		07/06/93	05/13/93	
	Stormwater Permit	09/06/94 **	07/13/93	05/18/93	05/17/93	12/29/94 **	09/28/93	04/28/93	04/28/93	05/24/93	10/18/92		07/06/93	05/17/93	
	Implementation Agreement	05/05/93	05/13/93	05/24/93	05/18/93	09/07/93	09/23/93	05/18/93	09/02/93	05/18/93		09/04/93	05/25/93	11/04/93	
	05/05/93	05/13/93	05/24/93	05/18/93	09/07/93	09/23/93	05/18/93	09/02/93	05/24/93		09/23/93	05/25/93	11/04/93		

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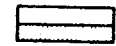
# STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES

as of: January 3, 1995

Dead-lines	Activities	Pasadena	Pomona	Rosemead	San Dimas	San Fernando	San Gabriel	San Marino	Sierra Madre	South El Monte	South Pasadena	Temple City	Walnut	West Covina
Sept. 30 1992	Submission of Existing Rainfall Data	09/21/92	10/06/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	10/13/92	09/12/92	10/20/92	09/28/92	09/30/92	09/15/92
	Submission of Existing Flow Data	09/21/92	10/06/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	10/13/92	09/20/92	10/20/92	10/06/92	09/30/92	09/17/92
	Submission of Existing Water Quality Data	09/21/92	10/06/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	11/24/92	09/12/92	10/20/92	10/06/92	09/30/92	09/15/92
		09/21/92	10/06/92	09/22/92	09/14/92	10/05/92	09/29/92	10/07/92	11/23/92	09/20/92	10/20/92	10/06/92	09/30/92	09/17/92
Oct. 30 1992	Alignment of Stormdrain	11/03/92	11/18/92	11/02/92	11/25/92	07/29/92	10/28/92	04/28/94	12/01/92	10/19/92	11/12/92	10/29/92	11/01/92	07/28/92
	Identification of Natural Drainage Watercourses	11/03/92	11/18/92	11/02/92	11/25/92	11/02/92	10/29/92	04/28/94	12/01/92	10/26/92	11/18/92	11/02/92	11/02/92	10/06/92
	Identification of Private Drainage Systems	11/03/92	11/18/92	11/02/92	11/25/92	09/15/92	10/20/92	04/28/94	12/01/92	10/26/92	11/18/92	11/02/92	11/02/92	10/06/92
	Definition of Drainage boundaries	11/03/92	11/18/92	11/02/92	11/25/92	09/15/92	11/24/92	04/28/94	12/01/92	10/26/92	11/18/92	11/04/92	11/02/92	03/29/93
		11/03/92	11/18/92	11/02/92	11/25/92	10/20/92	12/03/92	04/28/94	04/07/93	10/19/92	11/12/92	11/16/92	11/25/92	07/28/92
Nov. 30 1992	Determination of Existing BMPs for Construction Sites	12/02/92	12/02/92	11/30/92	09/08/92	11/24/92	11/30/92	12/02/93	11/24/92	11/30/92		11/16/92	11/30/92	01/05/93
	Existing BMPs for Illegal Discharge & Disposal Practices	12/02/92	12/02/92	11/30/92	09/09/92	11/24/92	11/30/92	12/02/93	11/24/92	11/30/92		11/16/92	11/30/92	01/05/93
	Existing BMPs for Residential, Commercial, & Industrial	12/02/92	12/02/92	11/30/92	09/09/92	11/24/92	11/30/92	12/02/93	11/24/92	11/30/92		11/16/92	11/30/92	01/05/93
		12/02/92	12/02/92	12/01/92	09/14/92	11/24/92	12/01/92	12/02/93	11/23/92	12/01/92		11/17/92	11/30/92	01/05/93
Feb. 1 1993	Identification of Waste Disposal Facilities	09/21/92	02/03/93	02/03/93	09/09/92	10/01/92	01/20/93	12/02/93	11/24/92	09/19/94 **	09/04/93	10/30/92	11/30/92	09/15/92
		02/03/93	02/03/93	01/02/93	10/14/93	10/19/92	01/20/93	12/02/93	11/25/92	09/19/94 **		11/02/92	11/30/92	02/04/93
Mar. 1 1993	Identification of Industries by SIC Code	03/08/93	04/15/93	02/08/93	03/04/93	01/19/93	02/17/93	12/02/93		09/22/94 **	09/04/93	11/16/92	12/02/92	03/08/93
		03/08/93	04/15/93	02/08/93	03/04/93	01/19/93	02/17/93	12/02/93		09/22/94 **	09/05/93	11/16/92	12/02/92	03/08/93
Apr. 1 1993	Development of Early Action BMP Plan	03/23/93	04/12/93	04/05/93	04/12/93	04/01/93	03/31/93	12/10/93	04/06/93	04/01/93			03/31/93	03/29/93
		04/07/93	04/12/93	04/05/93	04/12/93	04/01/93	03/31/93	12/10/93	04/06/93	04/01/93			04/01/93	04/01/93
Apr. 19 1993	Submission of Signature Block	04/12/93	04/22/93	04/12/93	04/21/93	04/15/93	04/21/93	04/28/93	04/28/93	04/22/93		04/28/93	04/12/93	04/12/93
		04/12/93	04/22/93	04/12/93	04/21/93	04/15/93	04/21/93	04/28/93	04/28/93	04/22/93		04/28/93	04/12/93	04/12/93
May 13 1993	Required Legal Authority for Regulation of Stormwater/Urban Runoff	05/13/93	09/02/93	05/11/93	10/05/94 **	09/06/93	09/12/93	12/10/93		09/22/94 **			04/28/93	05/17/93
	Stormwater Permit Implementation Agreement	09/17/93	09/02/93	09/30/93	09/23/93	12/07/93	09/12/93	09/18/93	09/24/93	09/06/93	10/08/93	11/29/93	09/20/93	09/21/93
		09/17/93	09/08/93	09/30/93	05/23/93	12/07/93	09/12/93	09/18/93	09/24/93	09/06/93	10/08/93	11/29/93	09/20/93	09/21/93

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### STATUS OF YEAR 2 ACTIVITIES FOR PHASE II AGENCIES

as of March 30, 1988

Dead-Line	Activities	Alameda	Alameda	Anne	Baldwin Park	Bradbury	Burbank	Colton	Colton	Cremont	Covina	Diamond Bar	Duarte	El Monte
Jul 1 1983	Identification of Manholes	08/23/83	07/01/83	10/28/82	07/05/84	11/08/83		NA	08/24/83	11/23/83	08/24/83	08/22/83	08/24/83	08/30/83
	Catch Basin & Sizing Info	08/29/83	08/29/84	10/29/82	07/05/84	11/08/83		NA	08/31/84	12/06/83	08/19/83	08/22/83	08/17/84	07/08/83
	Databases (11/2" Disk) of Size & Type of Each Drain	08/23/83	04/04/84	11/30/82	07/05/84	11/08/83		NA	08/24/83	12/01/83	08/24/83	12/18/83	08/24/83	08/30/83
Jul 1 1984	Schedule for Database (11/2" Disk) of Connection Inventory	04/11/83	08/21/84	11/30/82	07/01/83	11/08/83		NA	07/14/83	12/07/83	08/24/83	12/18/83	08/24/83	03/21/84
	24-Hour Spill Response Telephone Number	08/27/83	08/27/83	08/08/83	10/05/83	11/08/83	10/27/83	NA	12/02/83	10/12/83	10/14/83	12/08/83	10/14/83	08/10/83
Apr 13 1984	Plan for Additional BMPs for Residential Commercial & Industrial	04/11/84	04/13/84	03/03/84	04/13/84		08/21/84 **	NA	08/08/84 **	04/12/84	04/13/84	03/31/84	03/28/84	04/13/84
	Plan for Additional BMPs for Regal Discharges & Disposal Practices	04/11/84	04/13/84	03/03/84	04/13/84		08/21/84 **	NA	08/08/84 **	04/12/84	04/13/84	03/31/84	03/28/84	04/13/84
	Plan for Additional BMPs for Construction Sites	04/11/84	04/13/84	03/03/84	08/01/84 **		08/21/84 **	NA	08/08/84 **	04/12/84	04/13/84	04/04/84	03/28/84	08/08/84 **
		04/11/84	04/13/84	03/03/84	08/01/84 **		08/21/84 **	NA	08/08/84 **	04/12/84	04/13/84	04/04/84	03/28/84	04/13/84
		04/11/84	04/13/84	03/03/84	08/01/84 **		08/21/84 **	NA	08/08/84 **	04/12/84	04/13/84	04/04/84	03/28/84	08/08/84 **
May 31 1984	Evidence of Progress of Implementation of Early Action BMPs	08/28/84	08/31/84	03/03/84	08/08/84			NA	08/21/84 **	04/04/84	08/21/84	08/12/84		08/16/84
May 31 1984	Evidence of All Legal Authority for Regulation of Stormwater Runoff	08/28/84	08/31/84	08/08/84	08/01/84			NA	08/28/84	08/28/84	08/21/84	08/12/84	07/12/84	08/02/84

Dead-Line	Activities	Gardena	Gardena	Hidden Hills	Industry	Inglewood	La Brea/Flintridge	La Habra	La Habra	La Puente	La Verne	Los Angeles	Monrovia	Monterey Park
Jul 1 1983	Identification of Manholes	08/07/83	07/08/83	07/01/83	10/28/82	12/18/83	10/18/83	08/21/83	04/12/83	11/09/83		08/22/83	10/28/82	11/28/83
	Catch Basin & Sizing Info	08/17/83	12/21/83	12/01/84	08/17/83	18/15/83	10/18/83	08/21/83	04/12/83	08/22/83		08/22/83	08/08/84	11/08/83
	Databases (11/2" Disk) of Size & Type of Each Drain	08/07/83	07/07/83	07/01/83	08/14/83	12/18/83	10/18/83	08/30/83	04/12/83	08/08/84		12/01/83	07/08/83	07/28/83
Jul 1 1984	Schedule for Database (11/2" Disk) of Connection Inventory	08/07/83	11/02/84	07/01/83	08/14/83	10/18/83	10/18/83	08/30/83	04/12/83	08/08/84		12/01/83	08/08/84	07/28/83
	24-Hour Spill Response Telephone Number	10/21/83	10/21/83	08/18/83	08/31/83	11/08/83	10/14/83	08/21/83	11/18/83	08/21/83	NA	12/02/83	01/18/84	03/08/84
Apr 13 1984	Plan for Additional BMPs for Residential Commercial & Industrial	04/14/84	04/13/84	04/14/84	04/08/84	12/28/84 **	08/17/84	04/14/84	04/14/84	08/08/84 **	04/27/84		04/13/84	08/12/84 **
	Plan for Additional BMPs for Regal Discharges & Disposal Practices	04/14/84	04/13/84	04/14/84	04/08/84	12/28/84 **	08/17/84	04/14/84	04/14/84	08/08/84 **	04/27/84		04/13/84	08/12/84 **
	Plan for Additional BMPs for Construction Sites	04/14/84	04/13/84	04/14/84	04/08/84	12/28/84 **	08/17/84	04/14/84	04/14/84	08/08/84 **	04/27/84		04/13/84	08/12/84 **
		04/14/84	04/13/84	04/14/84	04/08/84	12/28/84 **	08/17/84	04/14/84	04/14/84	08/08/84 **	04/27/84		04/13/84	08/12/84 **
		04/14/84	04/13/84	04/14/84	04/08/84	12/28/84 **	08/17/84	04/14/84	04/14/84	08/08/84 **	04/27/84		04/13/84	08/12/84 **
May 31 1984	Evidence of Progress of Implementation of Early Action BMPs	08/31/84	08/31/84	08/24/84	08/07/84		08/28/84	04/14/84	04/14/84	08/08/84 **	04/27/84		08/31/84	08/03/84
May 31 1984	Evidence of All Legal Authority for Regulation of Stormwater Runoff	08/08/84	08/08/84	08/24/84	08/08/84		08/07/84	08/07/84	08/07/84	08/08/84 **	04/27/84		08/31/84	08/14/84

NA - Not applicable if activity approved by CDFWG to be covered under other phase

\*\* - Funded by CDFWG approved to be covered under other phase  
 \*\* - Late for county/fund/contract number

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 □ Data Determined Assignable As To Form

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES

as of: March 20, 1995

Dead- line	Activities	Alhambra	Arbete	Bell	Bell Gardens	Bellflower	Caltrans	Carson	Cerritos	Commerce	Compton	Cudahy	Downey	El Segundo	Gardena	Glendale	Hawthorn Gardens
	Letter of Intent	NA	09/16/93	09/24/93	09/23/93	09/21/93	NA	09/06/93	09/24/93	09/06/93	07/28/93	09/21/93	09/21/93	NA	09/05/93	NA	07/01/93
Sept 30 1993	Submittal of Existing Reinforced Data	NA	03/07/94	08/31/93	09/21/93	09/03/93	09/22/93	09/31/93	09/22/93	03/09/94 **	02/28/94 **	09/23/93	09/25/93	*	09/26/93	NA	03/03/94
	Submittal of Existing Flow Data	NA	03/07/94	08/31/93	09/21/93	09/03/93	09/22/93	09/31/93	09/22/93	03/09/94 **	02/28/94 **	09/23/93	09/25/93	*	09/26/93	NA	03/03/94
	Submittal of Existing Water Quality Data	NA	03/07/94	08/31/93	09/21/93	09/03/93	09/22/93	09/31/93	09/22/93	03/09/94 **	02/28/94 **	09/23/93	09/25/93	*	09/26/93	NA	03/03/94
	Water Quality Data	NA	03/07/94	08/31/93	09/21/93	09/03/93	09/22/93	09/31/93	09/22/93	03/09/94 **	02/28/94 **	09/23/93	09/25/93	*	09/26/93	NA	03/03/94
	Water Quality Data	NA	03/07/94	08/31/93	09/21/93	09/03/93	09/22/93	09/31/93	09/22/93	03/09/94 **	02/28/94 **	09/23/93	09/25/93	*	09/26/93	NA	03/03/94
Oct 14 1993	24-Hour Spill Response Telephone Number	NA	10/25/93	09/07/93	09/07/93	09/27/93	09/30/93	09/27/93	10/04/93	11/08/93	11/08/93	09/18/93	11/17/93	*	11/08/93	NA	11/08/93
Oct 128 1993	Assignment of Stormwater	NA	NA	10/24/93	10/27/93	09/27/93	09/20/94	10/20/94	11/03/93	NA	10/07/93	10/28/93	10/27/93	*	10/07/93	NA	NA
	Identification of Natural Drainage Wetlands	NA	NA	11/01/93	11/01/93	10/26/93	09/20/94	12/07/93	11/03/93	NA	10/07/93	10/28/93	10/27/93	*	10/07/93	NA	NA
	Identification of Private Drainage Systems	NA	NA	10/24/93	10/27/93	09/27/93	09/20/94	10/20/94	11/03/93	NA	10/07/93	10/28/93	10/27/93	*	10/07/93	NA	NA
	Definition of Drainage Priorities	NA	NA	11/01/93	11/01/93	10/26/93	09/20/94	12/07/93	11/03/93	NA	10/07/93	10/28/93	10/27/93	*	10/07/93	NA	NA
	Determination of Existing BMPs for Construction Sites	NA	03/23/94	11/30/93	11/24/93	11/23/93	12/01/93	11/29/93	12/22/93	09/28/94 **	07/18/94 **	11/30/93	11/24/93	*	11/29/93	NA	NA
	Existing BMPs for Illegal Discharge & Disposal Practices	NA	03/23/94	11/30/93	11/24/93	11/23/93	12/01/93	11/29/93	12/22/93	09/28/94 **	07/18/94 **	11/30/93	11/24/93	*	11/29/93	NA	NA
Feb 1 1994	Identification of Waste Disposal Facilities	NA	03/23/94	11/30/93	11/24/93	11/23/93	12/01/93	11/29/93	12/22/93	09/28/94 **	07/18/94 **	11/30/93	11/24/93	*	11/29/93	NA	NA
	Identification of Industries by SIC Code	NA	03/23/94	11/30/93	11/24/93	11/23/93	12/01/93	11/29/93	12/22/93	09/28/94 **	07/18/94 **	11/30/93	11/24/93	*	11/29/93	NA	NA
Mar 31 1994	Development of Early Action RMP Plan	NA	03/30/94	03/30/94	03/31/94	03/31/94	09/21/94 **	03/30/94	09/08/94 **	10/06/94 **	09/18/93 **	03/30/94	04/04/94	*	01/29/94	NA	
		NA		03/31/94	03/30/94	04/04/94	09/21/94 **	03/30/94	09/08/94 **	10/06/94 **	09/18/93 **	03/31/94	04/04/94	*	01/29/94	NA	
May 12 1994	Required Legal Authority for Regulation of Stormwater Urban Runoff	NA		04/28/94	01/20/94	03/03/94	09/29/94 **	05/12/94	09/08/94	09/29/94 **		04/28/94	09/31/94	*	09/31/94	NA	09/18/94
	Stormwater Permit Implementation Agreement	NA		08/10/94	09/12/94	11/08/93	09/02/94	04/28/94	09/12/94	09/18/94	10/01/94 **	09/29/94	09/12/94	NA	11/18/93	NA	09/18/94
		NA		09/10/94	09/12/94	11/08/93	09/02/94	04/28/94	09/12/94	09/18/94	10/01/94 **	09/29/94	09/12/94	NA	11/18/93	NA	09/18/94

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\*\* = Less for countywide review

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LTA VMP PHASE III

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES

as of March 20, 1985

Dead- lines	Activities	Hawthorne	Huntington Park	Inglewood	La Canada Flintridge	La Habra Heights	La Mirada	Lakewood	Lawndale	Lomita	Long Beach	Los Angeles	Lynwood	Maywood	Montebello	Norwalk	Palos Verdes Estate
	Letter of Intent	02/01/83	02/01/83	NA	04/22/83	NA	07/21/83	08/30/83	04/21/83	08/14/83	08/10/83	NA	08/21/83	08/30/83	NA	08/24/83	NA
Sept 30 1983	Submittal of Existing Rainfall Data	08/18/83	08/05/83	*	08/05/83	04/18/84	08/29/83	08/29/83	08/28/83	03/07/84 **	08/27/83	08/27/81	08/08/83	08/25/83	NA	08/13/83	NA
	Submittal of Existing Flow Data	08/18/83	08/05/83	*	08/05/83	04/18/84	08/29/83	08/29/83	08/28/83	03/07/84 **	08/27/83	08/08/81	08/08/83	08/25/83	NA	08/13/83	NA
	Submittal of Existing Water Quality Data	08/18/83	08/05/83	*	08/05/83	04/18/84	08/29/83	08/29/83	08/28/83	03/07/84 **	08/27/83	08/30/82	08/08/83	08/25/83	NA	08/13/83	NA
	24-Hour Spill Response	01/26/84	10/05/83	*	10/14/83	01/12/84	01/12/84	11/10/83	10/21/83	02/10/84	08/20/83	07/07/83	11/18/83	08/18/83	NA	10/18/83	NA
	Telephone Number	01/21/84	10/05/83	*	10/14/83	02/24/84	01/12/84	11/10/83	10/21/83	02/10/84	08/20/83	07/07/83	11/18/83	08/18/83	NA	10/18/83	NA
Oct 28 1983	Alignment of Stormdrain	10/27/83	10/05/83	*	10/18/83	NA	10/27/83	10/27/83	10/28/83	NA	10/27/83	10/27/83	08/15/84	10/28/83	NA	10/27/83	NA
	Identification of Natural Drainage Watercourses	10/27/83	08/05/83	*	10/18/83	NA	10/27/83	10/27/83	10/28/83	NA	10/27/83	11/01/83	08/15/84	10/28/83	NA	10/27/83	NA
	Identification of Private Drainage Systems	10/27/83	08/05/83	*	10/18/83	NA	10/27/83	10/27/83	10/28/83	NA	10/27/83	10/27/83	08/15/84	10/28/83	NA	10/27/83	NA
	Definition of Drainage Boundaries	10/27/83	10/05/83	*	10/18/83	NA	10/27/83	10/27/83	10/28/83	NA	10/27/83	10/27/83	08/15/84	10/28/83	NA	10/27/83	NA
	Drainage Boundaries	11/01/83	11/20/83	*	10/18/83	NA	11/02/83	11/02/83	11/02/83	NA	10/27/83	11/01/83	08/15/84	11/02/83	NA	11/02/83	NA
	Determination of Existing BMPs for Construction Sites	11/30/83	11/30/83	*	11/23/83	NA	08/31/84	12/01/83	11/30/83	01/17/85 **	11/30/83	03/13/81	08/15/84	11/30/83	NA	11/23/83	NA
Nov 30 1983	Existing BMPs for Illegal Discharge & Disposal Practices	11/30/83	11/30/83	*	11/23/83	NA	08/31/84	12/01/83	11/30/83	01/17/85 **	11/30/83	03/13/81	08/15/84	11/30/83	NA	11/23/83	NA
	Existing BMPs for Residential Commercial & Industrial	11/30/83	11/30/83	*	11/23/83	NA	11/24/83	12/01/83	11/30/83	01/17/85 **	11/30/83	06/13/81	08/15/84	11/30/83	NA	11/23/83	NA
	Commercial & Industrial	11/30/83	11/30/83	*	11/23/83	NA	08/31/84	12/01/83	11/30/83	01/17/85 **	11/30/83		08/15/84	11/30/83	NA	11/23/83	NA
Feb 1 1984	Identification of Waste Disposal Facilities	01/28/84	01/10/84	*	12/07/83	NA	01/28/84	02/02/84	02/02/84		01/31/84	07/03/81	08/08/83	01/28/84	NA	02/01/84	NA
	Identification of Industries by SIC Code	03/02/84	10/05/83	*	12/07/83	NA	02/23/84	11/10/83	03/02/84		10/27/83	10/08/82	08/08/83	02/23/84	NA	02/15/84	NA
Mar 31 1984	Development of Early Action BMP Plan	04/04/84	03/17/84	*	02/02/84	NA	03/30/84	03/31/84	04/07/84	01/17/85 **	03/31/84	04/05/83	08/07/84 **	03/30/84	NA	03/31/84	NA
	Development of Early Action BMP Plan	04/04/84	03/17/84	*	02/02/84	NA	03/30/84	03/31/84	04/07/84	01/17/85 **	03/31/84	04/27/84	08/07/84 **	03/31/84	NA	04/04/84	NA
May 12 1984	Required Legal Authority for Regulation of Stormwater/Urban Runoff	08/24/84	05/02/84	*	04/27/84	NA	05/18/84	08/12/84	08/28/84	01/17/85 **	08/12/84	08/20/81	08/15/84	04/28/84	NA	08/08/84	NA
	Stormwater Permit Implementation Agreement	08/24/84	02/24/84	NA	NA	NA	10/04/83	08/18/84	08/28/84	08/28/84	08/28/84	08/12/84	11/18/83	08/12/84	NA	11/08/83	NA
	Stormwater Permit Implementation Agreement	08/24/84	02/24/84	NA	NA	NA	10/04/83	08/18/84	08/28/84	08/28/84	08/28/84	08/12/84	11/18/83	08/12/84	NA	11/08/83	NA

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 \*\* = Late for countywide review

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R0032663

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES

as of March 20, 1995

Dead- line	Activities	Paramount	Pasadena	Pico Rivera	Rancho Pabre Verdes	Redondo Beach	Rolling Hills	Rolling Hills Est.	Santa Clarita	Santa Fe Springs	Signal Hill	South Gate	South Pasadena	Torrance	Vernon	Whittier
	Letter of Intent	06/01/93	NA	06/24/93	NA	NA	NA	NA	06/14/93	08/19/93	06/21/93	06/24/93	NA	NA	06/08/93	06/21/93
Sept 30 1993	Submission of Existing Rainfall Data	09/20/93	NA	09/07/93	NA	NA	NA	NA	09/27/93	09/21/93	06/31/93	06/16/93	NA	NA	09/21/93	09/08/93
	Submission of Existing Flow Data	09/20/93	NA	09/07/93	NA	NA	NA	NA	09/27/93	09/21/93	06/31/93	06/23/93	NA	NA	09/21/93	09/08/93
	Submission of Existing Water Quality Data	09/20/93	NA	09/07/93	NA	NA	NA	NA	09/27/93	09/21/93	06/31/93	06/23/93	NA	NA	09/21/93	09/08/93
	24-Hour Spill Response	09/07/93	NA	10/26/93	05/27/93	03/07/94	NA	06/07/93	10/12/93	10/18/93	08/31/93	09/29/93	NA	08/09/93	10/26/93	09/08/93
	Telephone Number	09/07/93	NA	10/26/93	05/27/93	03/07/94	NA	06/07/93	10/12/93	10/18/93	08/31/93	09/29/93	NA	08/09/93	10/26/93	09/08/93
Oct 28 1993	Alignment of Storm Drain	10/27/93	NA	10/28/93	NA	NA	NA	NA	10/27/93	10/27/93	11/01/93	10/27/93	NA	11/03/93	10/28/93	10/27/93
	Identification of Natural Drainage Watercourses	11/01/93	NA	11/02/93	NA	NA	NA	NA	11/01/93	11/01/93	11/10/93	11/02/93	NA	11/03/93	11/02/93	11/01/93
	Identification of Private Drainage Systems	10/27/93	NA	10/28/93	NA	NA	NA	NA	10/27/93	10/27/93	11/01/93	10/27/93	NA	11/03/93	10/28/93	10/27/93
	Definition of Drainage Boundaries	11/01/93	NA	11/02/93	NA	NA	NA	NA	11/01/93	11/01/93	11/10/93	11/02/93	NA	11/03/93	11/02/93	11/01/93
	Determination of Existing BMPs for Construction Sites	11/24/93	NA	12/01/93	NA	NA	NA	NA	11/29/93	11/24/93	12/01/93	11/24/93	NA	NA	11/29/93	12/01/93
	Existing BMPs for Discharge & Disposal Practices	11/24/93	NA	12/01/93	NA	NA	NA	NA	11/29/93	11/24/93	12/01/93	11/24/93	NA	NA	11/29/93	12/01/93
Nov 30 1993	Existing BMPs for Residential Commercial & Industrial	11/24/93	NA	12/01/93	NA	NA	NA	NA	11/29/93	11/24/93	12/01/93	11/24/93	NA	NA	11/29/93	12/01/93
	Identification of Waste Disposal Facilities	09/20/93	NA	09/07/93	NA	NA	NA	NA	10/14/93	01/31/94	01/25/94	01/31/94	NA	NA	02/01/94	02/02/94
Mar 1 1994	Identification of Industries by SIC Code	12/20/93	NA	09/07/93	NA	NA	NA	NA	12/09/93	03/01/94	06/24/93	06/13/93	NA	NA	02/28/94	03/01/94
	Development of Early Action BMP Plan	03/30/94	NA	04/05/94	NA	NA	NA	NA	03/31/94	03/31/94	03/24/94	03/17/94	NA	NA	03/28/94	03/31/94
May 12 1994	Regulated Legal Authority for Regulation of Stormwater Urban Runoff	01/20/94	NA	09/07/93	NA	NA	NA	NA	03/18/94	06/18/94	04/28/94	11/18/93	NA	NA	06/11/94	06/12/94
	Stormwater Permit Implementation Agreement	02/04/94	NA	06/24/93	NA	NA	NA	NA	06/18/94	06/18/94	04/27/94	06/28/93	NA	NA	12/27/93	06/08/94
		02/08/94	NA	09/24/93	NA	NA	NA	NA	06/17/94	06/17/94	04/27/94	06/28/93	NA	NA	12/27/93	06/14/94

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### STATUS OF YEAR 2 ACTIVITIES FOR PHASE III AGENCIES

as of: March 20, 1995

Dead- lines	Activities	Alhambra	Artesia	Bell	Bell Gardens	Bell Flower	Caltrans	Carson	Cerritos	Commerce	Compton	Cudahy	Downey	El Segundo	Gardena	Glendale
Jul 1 1994	Identification of Manhole	NA	NA	06/30/94	01/27/94	09/21/93	09/20/94	06/30/94	06/30/94	NA	10/07/93	06/30/94	07/05/94	*	02/16/94	NA
	Catch Basin & Stationing Info	NA	NA	07/12/94	01/27/94	06/03/94			07/14/94	NA	03/16/95	07/12/94	06/24/94	*	02/17/94	NA
	Database (3 1/2" Disk) of	NA	NA	06/30/94	01/20/94	07/27/94	09/20/94		06/30/94	NA	03/16/95	06/30/94	07/05/94	*	02/16/94	NA
	Size & Type of Each Drain	NA	NA	07/12/94	01/27/94	06/03/94			07/14/94	NA		07/12/94	06/24/94	*	02/17/94	NA
Jul 3 1995	Schedule for Database (3 1/2" Disk)	NA			01/20/94	06/03/94				NA	03/16/95			*	11/09/94	NA
	of Connection Inventory	NA			01/27/94	09/03/94				NA				*		NA
Apr 13 1995	Plan for Additional BMPs for Resi-	NA			02/23/95									*	09/14/94	NA
	dential Commercial & Industrial	NA			02/29/95									*	09/14/94	NA
	Plan for Additional BMPs for Illegal	NA			02/28/95									*	09/14/94	NA
	Discharges & Disposal Practices	NA			02/28/95									*	09/14/94	NA
	Plan for Additional BMPs for	NA			02/28/95									*	09/14/94	NA
Construction Sites	NA			02/20/95									*		NA	
May 31 1995	Evidence of Progress of Imple-	NA												*		NA
	mentation of Early Action BMPs	NA											06/31/94	*		NA
May 31 1995	Evidence of All Legal Authority for	NA				03/03/94	05/25/94							*		NA
	Regulation of Stormwater/Runoff	NA				03/21/94	05/25/94							*		NA

Dead- lines	Activities	Hawaiian Gardens	Hawthorne	Huntington Park	Inglewood	La Canada Flintbridge	La Habra Heights	La Mirada	Lakewood	Lawndale	Lomita	Long Beach	Los Angeles	Lynwood	Maywood	Montebello
Jul 1 1994	Identification of Manhole	NA	07/05/94	04/18/94	*	10/1/93	NA	12/19/94	11/01/93	NA	NA	06/22/94	NA	06/15/94	06/30/94	NA
	Catch Basin & Stationing Info	NA	07/05/94	06/30/94	*	04/27/94	NA	12/27/94	NA	NA	NA	06/22/94	NA	06/15/94	07/12/94	NA
	Database (3 1/2" Disk) of	NA	07/05/94	06/16/94	*	02/23/94	NA	12/19/94	NA	NA	NA	06/30/94	NA	06/15/94	06/30/94	NA
	Size & Type of Each Drain	NA	07/05/94	06/30/94	*	03/06/94	NA	12/19/94	NA	NA	NA	06/30/94	NA	06/15/94	07/12/94	NA
Jul 3 1995	Schedule for Database (3 1/2" Disk)	NA		06/15/94	*	02/23/94	NA	12/19/94	NA	NA	NA		NA			NA
	of Connection Inventory	NA		06/30/94	*	03/03/94	NA	12/19/94	NA	NA	NA		NA			NA
Apr 13 1995	Plan for Additional BMPs for Resi-				*	01/25/95	NA						NA			NA
	dential Commercial & Industrial				*	01/25/95	NA						NA			NA
	Plan for Additional BMPs for Illegal				*	01/23/95	NA						NA			NA
	Discharges & Disposal Practices				*	01/23/95	NA						NA			NA
	Plan for Additional BMPs for				*	01/23/95	NA						NA			NA
Construction Sites				*	01/23/95	NA						NA			NA	
May 31 1995	Evidence of Progress of Imple-				*	01/18/95	NA						NA			NA
	mentation of Early Action BMPs				*	01/19/95	NA						NA			NA
May 31 1995	Evidence of All Legal Authority for		06/24/94		*	01/18/95	NA						NA			NA
	Regulation of Stormwater/Runoff		05/24/94		*	01/18/95	NA						NA			NA

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 \*\* = Late for countywide public review

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 Data Discovered Acceptable As To Form

R0032666

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**STATUS OF YEAR 2 ACTIVITIES FOR PHASE III AGENCIES**  
as of March 20, 1995

Dead- lines	Activities	Norwalk	Palo Verde Estates	Paramount	Pasadena	Pico Rivers	Rancho Palo Verde	Redondo Beach	Rolling Hills	Rolling Hills Est.	Santa Clara	Santa Fe Springs	Signal Hill	South Gate	South Pasadena	Torrance	Vernon	Whittier
Jul 1 1994	Identification of Manhole	10/27/93	NA	11/01/93	NA	11/02/93	NA	NA	NA	NA	12/08/94	10/23/93	08/29/94	08/22/94	NA	NA	08/30/94	08/29/94
	Catch Basin & Stationing Info	10/27/93	NA	01/27/94	NA	11/02/93	NA	NA	NA	NA	02/13/95	08/15/94	08/23/94	08/23/94	NA	NA	07/05/94	05/24/94
	Database (3 1/2" Disk) of Size & Type of Each Drain	05/30/94	NA	01/20/94	NA	03/08/95	NA	NA	NA	NA	10/24/94	08/30/94	08/29/94	08/22/94	NA	NA	06/30/94	08/29/94
		07/14/94	NA	01/27/94	NA	03/08/95	NA	NA	NA	NA		08/15/94	08/23/94	08/23/94	NA	NA	07/06/94	08/24/94
Jul 3 1995	Schedule for Database (1/2" Disk) of Connection Inventory		NA	01/27/94	NA	03/08/95	NA	NA	NA	NA			08/29/94	08/22/94	NA	NA		
Apr 13 1995	Plan for Additional BMPs for Resi- dential, Commercial, & Industrial		NA	02/28/95	NA		NA	NA	NA	NA					NA	NA		
	Plan for Additional BMPs for Illegal Discharges & Disposal Practices		NA	02/28/95	NA		NA	NA	NA	NA					NA	NA		
	Plan for Additional BMPs for Construction Sites		NA	02/28/95	NA		NA	NA	NA	NA					NA	NA		
May 31 1995	Evidence of Progress of Imple- mentation of Early Action BMPs		NA		NA		NA	NA	NA	NA			11/20/94		NA	NA		
May 31 1995	Evidence of All Legal Authority for Regulation of Stormwater/Purroll		NA		NA		NA	NA	NA	NA			11/20/94		NA	NA		

NA - Not of appropriate agency approved by CHWOCB  
to be covered under other program

- Pending CHWOCB approval to be covered under other program  
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☐ Date Received  
☐ Date Determined Applicable As To Permit

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**



101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600

April 14, 1995

Harry Stone, Director,  
County of Los Angeles  
Department of Public Works  
900 South Fremont Avenue  
Alhambra, CA 91803-1331

**APPROVAL OF PHASE II AND III MONITORING SITES (NPDES File No. CA0061654,  
CI 6948, Board Order No. 90-079)**

We have received your April 10, 1995, letter regarding the proposed monitoring locations for mass emission and land-use sampling and analyses. As discussed, these sampling locations are approved, with the following conditions:

1. The Regional Board reserves the right to add to or otherwise modify the list of sampling locations;
2. Los Angeles County Department of Public Works must form a task force to receive input on the monitoring program for Los Angeles County, including the locations of sampling stations;
3. Los Angeles County Department of Public Works must hire a consultant to:
  - ▶ Develop goals and objectives for the storm water monitoring program for Los Angeles County;
  - ▶ Evaluate the overall strategy for storm water monitoring in Los Angeles County;
  - ▶ Make recommendations for revising the existing sampling stations;
  - ▶ Make recommendations for revising the existing list of analytes;
  - ▶ Make recommendations for estimating reductions in loadings of pollutants from municipal storm sewer discharges;

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HARRY W. STONE, Director

**COUNTY OF LOS ANGELES**  
**DEPARTMENT OF PUBLIC WORKS**

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE:

WM-3

April 10, 1995

Dr. Robert P. Ghirelli  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Dr. Ghirelli:

**APPROVAL OF PHASE II AND III MONITORING SITES**

This will serve as a confirmation of a discussion on the proposed Phase II and III monitoring sites on February 23, 1995, between Regional Water Board and Public Works staff. Present were Ms. Catherine Tyrrell, Mr. Mark Pumford, Mr. Carlos Urrunaga, Mr. Gary Hildebrand and Mr. Bill DePoto. In the meeting, the Board staff verbally approved the location of the 12 water quality monitoring sites as proposed in our Phase II and III Stormwater/Urban Runoff Monitoring Program submitted to you on January 12, 1995. They are:

Los Angeles River @ Wardlow Road  
Coyote Creek below Spring Street  
Bouquet Creek upstream of Newhall Ranch Road  
Browns Creek @ Rinaldi Street  
Sawpit Creek @ Monrovia Creek  
Project No. 1402 @ Foothill Boulevard  
Project No. 3857 @ Hamlin Street  
Project No. 620 @ Glenwood Road  
Project No. 1 @ Alcoa Avenue  
Dominguez Channel @ 116th Street  
Private Drain No. 314 @ Firestone Boulevard  
Project No. 1202 @ Wilmington Avenue

To date, we have not received written approval of these sites. Since approval of the monitoring sites has been delayed past the end of February 1995, we can not guarantee installation of all 12 of the above sites by the onset of the 1995-96 rainy season. However, we are proceeding with design and construction as outlined in our January 12 submittal, and will get as many on line as we possibly can.

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Dr. Robert P. Ghirelli  
April 10, 1995  
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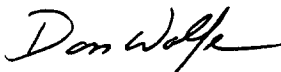
Mr. Pumford expressed concerns about the appropriateness of the remaining three proposed sites, specifically Rio Hondo Channel at Beverly Boulevard, San Gabriel River at San Gabriel River Parkway, and Los Angeles River at Tujunga Avenue, and stated that he wanted to conduct further discussions. We stated that, without approval of the remaining three sites at this time, we could not guarantee their installation by the onset of the 1995-96 rainy season. Mr. Pumford concurred with this assessment and stated that this would not cause us to be in noncompliance with the Monitoring Program.

To satisfy Mr. Pumford's concerns about public input on the proposed Phase II and III Monitoring Program, we discussed the Program at the Santa Monica Bay Restoration Project Technical Advisory Committee meeting on March 9, 1995. The Committee subsequently set a deadline of March 13 for comments from its members. According to Mr. Guang-yu Yang, of the Santa Monica Bay Restoration Project, no comments were received.

If you have any questions, please contact Mr. Bill DePoto at (818) 458-3537, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Director of Public Works

  
DONALD L. WOLFE  
Deputy Director

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HARRY W. STONE, Director

# COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE: WM-0

March 29, 1995

Dr. Robert P. Ghirelli  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Dr. Ghirelli:

### NEW STORMWATER PERMIT FOR LOS ANGELES COUNTY

This letter serves as confirmation of the agreements reached at the meeting on March 2, 1995, between Don Wolfe, Brian Hooper, Gary Hildebrand, Catherine Tyrrell, Mark Pumford, and Catherine Kuhlman of the U.S. EPA, Region IX.

A primary focus of this meeting was to discuss differing views on the viability of a single stormwater permit versus multiple watershed permits within Los Angeles County. The County believes, as does the Co-Permittee Executive Advisory Committee, that immediate implementation of individual permits for each identified major watershed would create a complex, redundant set of administrative structures that would not serve the goals of the Permit. The burden this would place upon the Principal Permittee, including resulting responsibilities and liabilities, would make it impossible for the County, or any other Permittee, to serve as Principal Permittee for six permits.

We believe that significant similarities exist among watersheds, and that a single permit, with specific attention to the unique characteristics of each watershed, is the most effective Permit renewal structure at the present time. We believe that this is especially necessary as the Permittees collectively and individually transition from the independent provisions of the current Permit to the watershed management plan approach.

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Dr. Robert P. Ghirelli  
March 29, 1995  
Page 2

In responding to our points, Ms. Tyrrell explained that the Water Quality Control Board is transitioning all permitting to a watershed basis with different schedules for renewals in the different watersheds. She stated that the objective of this effort is to focus on water quality issues "in the real world" rather than generically. Also, the Board believes that responsible parties, including cities, can best accomplish this by focussing on their independent watersheds. Ms. Tyrrell concluded that the Board is committed to six independent watershed-based stormwater permits that accommodate your watershed renewal schedules.

After thorough discussion, our staffs jointly agreed that a single Permit would be issued; however, each of the six watersheds would have a distinct stormwater management plan developed to address its unique characteristics. While every effort would be made to keep the generic issues in each plan consistent, it was agreed that the characteristics of each watershed would result in unique requirements with divergent time lines. It was also agreed that the plans would be developed with time lines to converge with your watershed permit renewal schedules and result in separate permits for each watershed in the future. This would provide for the progressive development of a technical and administrative framework for each watershed and the emergence of a Principal Permittee best suited to administer that watershed.

As agreed at the meeting, negotiating the next Permit will begin by determining the requirements for one watershed, which will then serve as a model for negotiating the requirements for the other five watersheds. The first watershed will be Malibu Creek. The Permit terms will be developed during a series of meetings to be held among your staff, the EAC, environmental groups and other stakeholders. It was agreed that the environmental groups would be represented by a maximum of three spokespersons during the negotiations.

An early working draft of the Permit covering the Malibu Creek Watershed was provided to us on February 14, 1995. The first meeting to discuss the contents of this draft Permit was held on March 20, at 1:00 p.m., at your office. At the request of Ms. Tyrrell, the EAC will not be submitting written comments regarding the provisions of the preliminary draft permit. Ms. Tyrrell suggested, and we concur, that it will improve the chance for a successful negotiations, if we do not formalize our positions prior to sitting down at the table.

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Dr. Robert P. Ghirelli  
March 29, 1995  
Page 3

I am looking forward to a series of productive meetings with your staff, and I am optimistic that we can produce a Permit in short order that will be considered "win" by all interested parties.

If you have any questions, please contact me at (818) 458-4014.

Very truly yours,

HARRY W. STONE  
Director of Pubic Works

  
DONALD L. WOLFE  
Deputy Director

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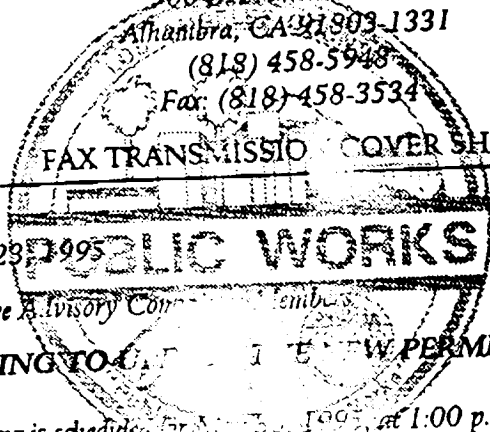
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# Los Angeles County Department of Public Works

900 S. Fremont Avenue  
Alhambra, CA 91803-1331  
(818) 458-5948  
Fax: (818) 458-3534



Date: March 29, 1995  
To: Executive Advisory Committee Members  
Re: MEETING TO DISCUSS NEW PERMIT

A meeting is scheduled for March 30, 1995, at 1:00 p.m., 3rd Floor Annex Building Conference Area, Los Angeles County Department of Public Works, 900 South Fremont Avenue, Alhambra, California. We strongly encourage that you attend the meeting so that we can fully discuss the Permit update situation and formulate strategies. Attached is a listing of all the House members which will be reviewing and taking account of the Stormwater Management Programs Bill that was distributed in our previous meeting. Your comments could be faxed directly to their offices rather than to NAFSMA.

If any clarification is needed, please me at (818) 458-5948.

Sender: Gary Hildebrand

YOU SHOULD RECEIVE 2 PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL (818) 458-6972.

Post-It™ brand fax transmittal memo 7571		# of pages
To: DA ROBERT BROWN	From: GARY HILDEBRAND	
Co: SENIOR CB	Phone: (818) 458-5948	
Fax: (818) 458-3534		

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The Honorable Daniel P. Moynihan  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Moynihan

The Honorable Frank R. Lautenberg  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Lautenberg

The Honorable Harry Reid  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Reid

The Honorable Bob Graham  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Graham

The Honorable Joseph I. Lieberman  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Lieberman

The Honorable Barbara Boxer  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Boxer

The Honorable John E. Chafee  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Chafee

The Honorable John Warner  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Warner

The Honorable Robert C. Smith  
Senate Committee on Environment & Public  
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SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Smith

The Honorable Latch Parish  
Senate Committee on Environment & Public  
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SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Parish

The Honorable Dick Kempthorn  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Kempthorn

The Honorable James M. Inhofe  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Inhofe

The Honorable Craig Thomas  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Thomas

The Honorable Mitch McConnell  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator McConnell

The Honorable Christopher (Kit) Bond  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Senator Bond

Mr. Steven Schinberg  
Minority Staff Director/Chief Counsel  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Mr. Schinberg

Mr. J. Thomas Siler  
Minority Staff Director/Chief Counsel  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Mr. Siler

Mr. Ken Koppala  
Committee on Transportation and Infrastructure  
2165 Rayburn House Office Building  
Washington DC 20515-6296  
Mr. Koppala

Mr. Ben Grumbles  
Senate Committee on Environment & Public  
Works  
SD-410 Dirksen Senate Office Building  
Washington D.C. 20510-6175  
Mr. Grumbles

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**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE REFER TO FILE: WM-0

March 22, 1995

Dr. Robert P. Ghirelli  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Mr. Ghirelli:

**STORMWATER PERMIT RENEWAL**

Enclosed, is a check in the amount of \$10,000 as the application fee for the renewal of National Pollution Discharge Elimination System Permit No. CA0061654.

Very truly yours,

HARRY W. STONE  
Director of Public Works

*Donald L. Wolfe*  
DONALD L. WOLFE  
Deputy Director

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# COUNTY OF LOS ANGELES

PAYABLE THROUGH  
FIRST UNION NATIONAL BANK  
CHASE HILL NORTH BRANCH  
IN COOPERATION WITH BANK OF AMERICA  
THE TREASURER OF THE COUNTY OF LOS ANGELES  
WILL PAY TO THE ORDER OF

CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
C/O DEPT. OF PUBLIC WORKS  
ATT.: NANCY COSTABILE  
(818) 458-6556

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AUDITOR CONTROLLER'S GENERAL WARRANT  
WARRANT CLEARANCE FUND - LOS ANGELES, CALIFORNIA

NOT PAYABLE AFTER TWO YEARS FROM DATE ISSUED 66 156 53

ISSUE DATE  
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WARRANT NO  
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MARK H. BLOODGOOD AUDITOR CONTROLLER  
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# LOS ANGELES/LONG BEACH HARBOR SAFETY COMMITTEE

Mandated by  
California Oil Spill Prevention and  
Response Act of 1990

March 17, 1995

Chairman

Capt. Kenneth Graham  
Jacobsen Pilot Service  
(Representing Long Beach Pilots)

Executive Secretary

Capt. Manny Aschemeyer  
Executive Director  
Marine Exchange of LA/LB Harbor

Members

- Mr. Graham Chase  
Arco Marine, Inc.  
(Representing Tanker Vessel Operators)
- Mr. Robert A. Clark, II  
American President Lines, Ltd.  
(Representing Dry Cargo Carriers)
- Chief Noel K. Cunningham  
(Representing Port of Los Angeles)
- Capt. Francis Lukowski  
L. A. Port Pilots  
(Representing Los Angeles Pilots)
- Mr. James J. Macaulay  
Crowley Marine Services, Inc.  
(Representing Tug and Barge Operators)
- Mr. Harlan Moore  
Assoc. of San Pedro Bay Yacht Clubs  
(Representing Recreational Boaters)
- Mr. Robert Nelson  
Long Beach Naval Shipyard  
(Representing U. S. Navy)
- Capt. Edward E. Page, USCG  
C.O., COTP/MSO/Group  
(Representing U.S. Coast Guard)
- Capt. Harvey M. Portz  
Chevron Shipping Co.  
(Representing Mooring Masters)
- Ms. Wilma Powell  
(Representing Port of Long Beach)
- Ms. Suzanne Rogalin  
(Representing Calif. Coastal Commission)
- Capt. Michael Rubino  
ILWU Local #68  
(Representing Organized Labor)
- Mr. Terry Tamminen  
Santa Monica Baykeeper  
(Representing Environmental Groups)
- Ms. Sara Wan  
League for Coastal Preservation  
(Representing Environmental Groups)

CDE&G/OSPR Liaison

- Mr. Peter Bontadelli  
OSPR Administrator
- Ms. Michelle Garcia-Stephens  
Regulations Analyst
- Mr. Al Storm  
Environmental Specialist

Dr. Robert Ghirelli  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza  
Monterey Park, CA 91754

Dear Dr. Ghirelli:

This Committee is tasked to, among other things, study and make recommendations to increase the safety of movement of all vessels, and ensure the protection of the environment.

At our February meeting, Mr. Phil Munsch representing SEATOW spoke eloquently regarding a pollution problem in our inner harbors. As a result of recent rainstorms a significant problem of trash in the water has persisted for some time. Both the Ports of Los Angeles and Long Beach have moved within their capabilities to alleviate this problem in areas under their jurisdiction.

Several members of our Committee expressed the opinion that your agency has a responsibility in the area of water run-off into the harbors. I enclose a memo from member Terry Tamminen representing Santa Monica Baykeeper. Do you have any assets that could be brought to bear at times like this? We, as a Committee, unfortunately have none.

In addition to the inner areas of both ports, there is the area of Long Beach Outer Harbor near the mouth of the Los Angeles River where the problem is apparently not being addressed. After severe rains the Los Angeles River brings an immense amount of debris to the harbor area from areas well inland.

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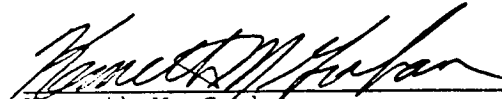
Dr. Robert Ghirelli  
March 17, 1995  
Page 2

It is a fact that this debris does not effect the safe movement of large commercial vessels. It is also true though that the problem is more than the negative visual effect. There is an actual financial impact on the operators of small vessels who incur monetary loss. This happens when the propellers of their vessels are damaged by the larger pieces, and the engine intakes become plugged with debris.

As this appears to fall under your jurisdiction we hope that you will make every effort to get all local jurisdictions to implement and improve their NPDES permits. All permits should include meaningful measures that will improve the situation.

By copy of this letter we are asking other governmental bodies around our bays for their assistance as well. We would appreciate hearing from you, and any other body, with capabilities and/or ideas that could work toward the minimization of this problem.

Sincerely,

  
Kenneth M. Graham  
Chairman

KMG/nlb

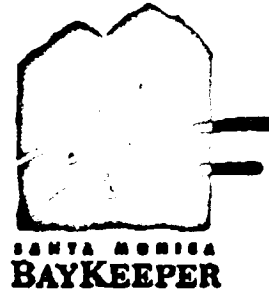
Enclosure

cc: Port of Long Beach, Chief Wharfinger  
City of Long Beach, Marine Bureau  
WorldPort LA, Port Warden  
City of Los Angeles, Mayor Richard Riordan  
City of Los Angeles, Board of Public Works  
County of Los Angeles, Dept. of Public Works

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February 8, 1995

TO: Sara Wan

FROM: Terry Tamminen

RE: HSC Letter to LA County concerning floating debris from LA River

1. The public comment by Capt. Phillip Munch (SEA TOW 310-521-1120) at the Feb. 1st meeting of the HSC and my two recent patrols of both harbors (1/31 and 2/3/95) confirm that there is a significant problem of floating debris in the harbors as a direct result of flushing of the LA County stormdrain/LA River watershed system. Debris observable included:

- plastic shopping bags
- wood (all sizes from small chunks to eight foot 2 X 4s and logs)
- litter (chip bags, cigarette packages, six-pack rings)
- one quart plastic oil containers
- condoms and tampon inserters
- cigarette butts
- shoes and clothing
- furniture parts
- tennis balls and toys
- construction grade sheet plastic (visqueen)

2. The impact of this debris is varied. On one patrol day, my propeller became fouled in plastics, shutting down the engine. I ran over floating wood and other objects which, at higher speeds or in the dark, would have caused extensive damage to my boat. The potential damage to vessels of all kinds cannot be underestimated. Even large ships have cooling water intakes which can become clogged by this debris.

3. Another impact is pollution from the decomposition of these materials. The chemicals used in the manufacture of plastics and the other items cited deposit in marine sediments, creating contaminated sediments which poison marine life. When dredged, these sediments cannot be disposed of with normal ocean disposal, but must be treated as hazardous waste (as the County knows from recent experience in Marina del Rey). The cost for ocean disposal of dredge spoils is 8 to 15 times less than methods used for disposal of contaminated sediments. Of course, heavy metals and other contaminants in sediments also come from storm water that has washed over the urban landscape and roadways.

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4. Another impact is the smothering of the ocean floor. Debris ultimately sinks to the ocean floor, smothering the habitat of numerous invertebrates and plant life at the base of the food chain.

5. The economy is also impacted. A recent look around the Queen Mary and adjacent docks (used for the Catalina Cruise boats) shows so much debris that the harbor looks like a third world country. The reaction of tourists to this persistent sight can only be assumed. It should be noted that after the heavy rains there was extensive debris floating in this area for as long as a week.

6. Safety is adversely impacted. The size and composition of debris creates hazards to navigation. Smaller boats can be sunk by collision at high speeds with the larger debris. Ship's propellers and steering gear can be fouled and damaged. As noted above, cooling water intakes on vessels of all sizes can be clogged, causing overheated engines, generators and other machinery.

7. There is a public health hazard. Numerous people fish in the waters of the harbors and the immediate vicinity. There are public beaches in the area of the Cabrillo Marine Museum. Rotting garbage, used condoms, tampon inserts and other organic debris create a persistent health risk for the people using these waters.

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HARRY W. STONE, Director

**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE: WM-3

March 15, 1995

Dr. Robert P. Ghirelli  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Attention Mark Pumford

Dear Dr. Ghirelli:

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
PERMIT NO. CA0061654, CI 6948, BOARD ORDER NO. 90-079  
ACTION ITEM PROGRESS REPORT**

In accordance with our agreement with you, as specified in our September 22, 1994 letter, we are reporting our progress in completing the monitoring program action items. This letter is the last of our agreed upon monthly status reports.

- a. Render operational an initial monitoring network of nine stations to establish long-term trends in stormwater quality in the Santa Monica Bay Drainage Basin. Seven stations are to be made operational by November 15, 1994, and two by January 1, 1995.

Status: An operating history of our nine automated sampling stations is attached.

Each station is comprised of state-of-the-art sampling equipment which has been custom modified to meet the unique conditions of our storm drain system. To the best of our knowledge, we are the first agency to attempt to put in place such a system utilizing special equipment for stormwater sampling. Each site has been initially programmed during dry weather with uniform flow, if any, and under stable conditions. These sites are currently being tested during the often turbulent and rapidly changing conditions that occur during storm events. During this storm season, we have been observing and evaluating the performance of the sampling equipment so that the equipment configuration and programming can be adjusted to best collect the needed samples.

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Dr. Robert P. Ghirelli  
March 15, 1995  
Page 2

Therefore, it is unknown as to the number of storm events that will be successfully sampled at each site by the end of this storm season.

- b. Test and integrate a selected stormwater model into the monitoring program to refine annual estimates of pollutant loads to Santa Monica Bay.

Status: The basinwide pollutant load model is operational and will be able to calculate refined pollutant load estimates once event-mean concentration values for various pollutants are available from the monitoring program data.

The EPA Stormwater Management Model developed for Kenter Canyon is operational and has been run using historical data.

- c. Implement targeted monitoring to identify sources of specific toxic pollutants in stormwater and urban runoff in the Santa Monica Bay Drainage Basin. The initial source targeted may include municipal corporation facilities.

Status: Implementation of monitoring at our County Road Maintenance District Yard No. 3 began January 10, 1995, when a complete set of discrete samples were collected from the storm of that date. Other complete sets of samples were collected from the storms of January 23, February 14, and March 3, 1995. All sets were delivered to our Lab for analysis.

- d. Develop and begin implementation of a monitoring program to evaluate effectiveness of specific BMPs in the Santa Monica Bay Drainage Basin.

Status: We have completed development of a uniform data collection format for the 13 baseline BMPs to collect information on BMP implementation for use in assessing BMP effectiveness. A copy of the forms was provided to you in our January report. The County has been modifying its procedures to allow for the use of this collection format for our operations Countywide. We will continue to work with the other Permittees to establish a format to be implemented by all agencies. The data collected will be used to assess BMP effectiveness during future Annual Reports.

- e. Implement a monitoring program to identify locations of illegal practices and to eliminate pollutant sources in the Santa Monica Bay Drainage Basin.

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Dr. Robert P. Ghirelli  
March 15, 1995  
Page 3

Status: Inspection reports for December 1994 and January and February 1995 are attached.

- f. Advertise a Request for Proposal to develop a program to evaluate stormwater impacts on selected receiving waters including conducting toxicity studies in the Santa Monica Bay Drainage Basin.

Status: Five proposals were received from bidders on February 1, 1995. We will be contacting you soon about the funding of this study.

- g. Submit a revised monitoring program for Phases II and III that includes all program elements with timelines for development and implementation.

Status: The revised monitoring plan was submitted to you January 12, 1995. We are awaiting your approval.

As previously stated in our January 12, 1995 letter to you, if installation and operation of the 15 monitoring stations in Phases II and III are required by October 1995, the start of the next rainy season, we will need to begin detailed design of these sites immediately. As requested by Mark Pumford, we gave a presentation of our proposed monitoring program and the 15 proposed Phase II and III site locations to the Technical Advisory Committee of the Santa Monica Bay Restoration Project on March 9, 1995 to satisfy his desire for public input on the program. The Committee was given until March 13, 1995 to submit comments, after which time, if we hear nothing further from you, we will proceed with the construction of 12 out of 15 sites as we proposed.

Mr. Pumford desires to conduct further discussions on the appropriateness of the Rio Hondo, San Gabriel River, and the Los Angeles River at Tujunga Avenue sites. He also wishes to pursue discussions on coordinating stormwater monitoring in these three watersheds with other point source dischargers. We informed him that though we are most willing to discuss these three sites further, doing so would in all likelihood delay installation of these sites until after the start of the 1995-96 rainy season. Mr. Pumford acknowledged this possibility.

Finally, we would also like you to review the alternative sites listed in our monitoring proposal. These alternatives would be substituted for sites that might develop unforeseen delays.

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AUTOMATED MONITORING STATIONS  
OPERATING HISTORY  
(3/15/95)

STATION	HISTORY	PRESENT STATUS
Ballona Creek	Installed 3/94. Storm of 12/24/94: No composite collected due to power malfunction. Storm of 1/3/95: Composite samples collected and taken to lab on 1/5/95. Storm of 1/10/95: Composite sample collected and taken to lab on 1/13/95. Storm of 1/23/95: No composite sample collected due to clogged tubing. Tubing cleared subsequently. Storm of 2/14/95: Composite sample collected and taken to Lab. Storm of 3/3/95: No composite sample collected due to malfunction; subsequently corrected. Storm of 3/10/95: Composite sample collected and taken to Lab.	Operational
Malibu Creek	Installed 10/94 Storm of 12/24/94: Composite sample not collected due to probable clogged tubing. Storm of 1/3/95: Composite sample collected and taken to Lab on 1/9/95. Storm of 1/10/95: Severe flooding in area prohibited inspection of station until 1/19/95. Evidence showed that auxiliary pump was submerged for considerable time and not currently operating. Storm of 1/23/95: No composite sample collected due to damaged pump. Storm of 2/14/95: No composite sample collected due to damaged pump. Pump replaced the week of 2/27/95. Storm of 3/3/95: No composite sample collected due to switch not correctly set; subsequently corrected. Storm of 3/10/95: No composite sample collected due to local power failure involving road repair, which erased program memory.	Reprogramming the week of 3/13/95.

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STATION	HISTORY	PRESENT STATUS
Trancas Creek	<p>Installed 7/94  Storm of 12/24/94: No appreciable runoff.  Storm of 1/3/95: Composite sample collected and taken to Lab on 1/9/95.  Storm of 1/10/95: No composite sample collected due to clogged tubing.  Storm of 1/23/95: No composite sample collected due to clogged tubing; subsequently cleared.  Storm of 2/14/95: Composite sample collected and taken to the Lab.  Storm of 3/3/95: No composite sample collected due to clogged tubing; subsequently cleared.  Storm of 3/10/95: No composite sample collected due to clogged tubing.</p>	<p>Not operating.  Tubing will be cleared out the week of 3/13/95.</p>
Kenter Drain	<p>Installed 7/94  Storm of 12/24/94: Composite samples not collected due to clogged tubing. Tubing cleared 12/27.  Storm of 1/3/95: Composite samples collected and taken to Lab on 1/9/95.  Storm of 1/10/95: No composite sample collected due to disconnected tubing. Tubing reconnected 2/3/95.  Storm of 1/23/95: No composite sample collected due to clogged tubing; subsequently cleared.  Storm of 2/14/95: No composite sample collected due to clogged tubing; subsequently cleared.  Storm of 3/3/95: Composite sample collected and taken to Lab.  Storm of 3/10/95: Composite sample collected and taken to Lab, but tubing clogged toward end of sampling.</p>	<p>Not operating.  Tubing will be cleared out the week of 3/13/95.</p>
D2361 - Los Angeles	<p>Installed 11/94  Storm of 12/24/94: Composite sample collected and taken to Lab.  Storm of 1/3/95: Composite sample collected and taken to Lab.  Storm of 1/10/95: Composite sample collected and taken to Lab.  Storm of 1/23/95: Composite sample collected and taken to Lab.  Storm of 2/14/95: Composite sample collected and taken to Lab.  Storm of 3/3/95: Composite sample collected, but not taken to Lab due to human error.  Storm of 3/10/95: Composite sample collected and taken to Lab.</p>	<p>Operational.</p>

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STATION	HISTORY	PRESENT STATUES
Pier Drain - Santa Monica	Installed 12/94 Storm of 12/24/94: No composite sample collected due to electronics malfunction. Storm of 1/3/95: No composite sample collected due to electronics malfunction. Storm of 1/10/95: Composite samples collected and taken to the Lab on 1/13/95. Storm of 1/23/95: Composite sample collected and taken to Lab. 24-hr Dry Weather composite set-up 1/31/95, but no flow detected. Storm of 2/14/95: Composite sample collected and taken to Lab. Storm of 3/3/95: Composite sample collected and taken to Lab. Storm of 3/10/95: Composite sample collected and taken to Lab.	Operational
Project 5401 - Manhattan Beach	Installed 11/94 Storm of 12/24/94: Composite sample collected and taken to Lab on 12/27/94. Storm of 1/3/95: Composite samples collected and taken to Lab on 1/5/95. Storm of 1/10/95: Composite samples collected and taken to Lab on 1/13/95. Storm of 1/23/95: Composite sample collected and taken to Lab. 24-hr Dry Weather composite collected 1/31/95 and taken to Lab on 2/1/95. Storm of 2/14/95: Composite sample collected and taken to Lab. Storm of 3/3/95: Composite sample collected and taken to Lab. Storm of 3/10/95: Composite sample collected and taken to Lab.	Operational
Project 558 - Palos Verdes Estates	Installed 11/94 Storm of 12/24/94: No composite samples collected due to malfunctioning pressure transducer. Transducer replaced 12/27/94. Storm of 1/3/95: Station severely damaged. Transducer ripped out, grate broken, angle iron bent. Storm drain also suffered structural damage. Storm of 1/23/95: No composite collected due to drain damage. Storm of 2/14/95: No composite collected due to drain damage. Storm of 3/3/95: No composite collected due to drain damage. Storm of 3/10/95: No composite collected due to drain damage.	Repairs began 3/14/95.

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STATION	HISTORY	PRESENT STATUS
Herondo Drain	Installed 12/29/94 Storm of 1/3/95: No composite samples collected due to malfunctioning auxiliary pump. Storm of 1/10/95: No composite samples collected due to malfunctioning auxiliary pump. Storm of 1/23/95: No composite sample collected due to malfunctioning auxiliary pump. Pump rewired 2/3/95. Storm of 2/14/95: Composite sample collected and taken to Lab. Storm of 3/3/95: Composite sample collected and taken to Lab. Storm of 3/10/95: Composite sample collected and taken to Lab.	Operational

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ILLCIT DISCHARGE INSPECTION REPORT

REPORTING PERIOD February 1995

OPEN CHANNEL	AREA INSPECTED		ILLCIT DISCHARGE	
	FROM	TO	NUMBER OBSERVED	COMMENTS
Flint Canyon Channel	Woodleigh Lane crossing		2*	2 sites: residential properties discharging possible yard drainage, pool filter backwash, and or gray water.
Winery Canyon Channel	Alta Park Lane crossing		3*	3 sites: residential properties discharging possible yard drainage and/or gray water.
Gould Canyon Channel	Gould Avenue crossing		4*	4 sites: residential properties discharging possible yard drainage and/or gray water.
Aliso Creek	—	—	Follow-up to December Reporting Period	1 site: located within the City of Los Angeles, referred to the City of Los Angeles Storm Management Division (LASMD). LASMD is conducting an ongoing investigation of referral.
Upper Los Angeles River	—	—	Follow-up to December Reporting Period.	1 site: ongoing, joint investigation with LASMD, LACDPW and LAC Fire HAZMAT. Site investigation conducted discussing findings with the City of Los Angeles, City Attorney.
Santa Susana Channel	—	—	Follow-up to December Reporting Period	3 sites: located within the City of Los Angeles referred to LASMD. LASMD is conducting an ongoing investigation of referrals.
Coldwater & Higgins Channels	Full	Reach	—	NONE.
Santa Monica Channel	Full	Reach	—	NONE.
Mandeville Canyon Channel	Full	Reach	—	NONE.
Rivas Canyon Channel	Full	Reach	—	NONE.
Sullivan Canyon Channel	Full	Reach	—	NONE.
Parker-Mesa Drive Channel	Full	Reach	—	NONE.

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\*LACDPW is conducting an area-wide investigation. Upon completion of investigation and analysis of findings; the CRWQCB and the City of La Canada Flintridge will be contacted to determine appropriate steps in order to eliminate any illicit discharges.

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ILLCIT DISCHARGE INSPECTION REPORT

REPORTING PERIOD January 1995

OPEN CHANNEL	AREA INSPECTED		ILLCIT DISCHARGE	
	FROM	TO	NUMBER OBSERVED	COMMENTS
Sepulveda Channel	Full	Reach	—	NONE
Sawtelle Channel	Full	Reach	—	NONE
Centinela Creek	Full	Reach	—	NONE
Benedict Canyon	Full	Reach	—	NONE
Rexford Channel	Full	Reach	—	NONE

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# ILLCIT DISCHARGE INSPECTION REPORT

REPORTING PERIOD December 1994

OPEN CHANNEL	AREA INSPECTED		ILLCIT DISCHARGE	
	FROM	TO	NUMBER OBSERVED	COMMENTS
Ballona Creek	Dunsmuir Ave City of Los Angeles	405 FWY	1	1 - Oil sheen entering channel from City of Los Angeles Drain referred to City of Los Angeles Storm Management Division (LASMD)
Pacoima Wash	Glenoaks Blvd	5th Street	2	2 - Sites issued notices to cease discharge and conduct site assessment/remediation.
Upper Los Angeles River	Station 660+00	Station 948+00	3	2 - Sites located within City of Los Angeles. Referred to LASMD. 1 - Site on going, joint investigation with LASMD, LACDPW, and LACoFire HAZMAT.
Aliso Creek	Full	Reach	2	1 - Site located within City of Los Angeles Joint inspection conducted (LASMD and LACDPW) illicit discharge resolved. 1 - Site located within City of Los Angeles, referred to LASMD.
Burbank Western	Full	Reach	6	1 - Site located within City of Burbank, referred to City of Burbank, City obtained compliance. 5 - Sites, compliance obtained in field by LACDPW.
Tujunga Wash	Station 2+00	Station 146+00	—	NONE
Tujunga Wash	Station 146+00	Station 499+00	—	NONE
Santa Susana Creek	Station 41+00	Station 200+00	4	1 - Site, search warrant served jointly by City of L.A. Bureau of Sanitation, LACoFire HAZMAT, and LACDPW. 3 - Sites located within City of Los Angeles referred to LASMD.

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ILLICIT DISCHARGE INSPECTION REPORT

REPORTING PERIOD December 1994

OPEN CHANNEL	AREA INSPECTED		ILLICIT DISCHARGE	
	FROM	TO	NUMBER OBSERVED	COMMENTS
Wilbur Creek	Full	Reach	—	NONE
East Canyon Channel	Station 70+50	—	1	1 - Site located within City of Los Angeles. Joint inspection conducted (LASMD and LACDPW) illicit discharge resolved.

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COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE: WM-3

March 13, 1995

Dr. Robert P. Ghirelli  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Dr. Ghirelli:

**MUNICIPAL STORMWATER PERMIT CONFIRMATION OF DISCUSSION ON  
STORMWATER PERMIT PROGRAM**

We appreciate the opportunity to have met with you and Catherine Tyrrell, of your staff, on February 9, 1995, to discuss various issues regarding the subject Program. This letter serves as confirmation of our discussion.

**1. Monitoring Program Action Items**

**a. Installation of Monitoring Stations**

The monitoring stations for the Santa Monica Bay Drainage Basin have all been installed and rendered operational in accordance with the our agreement as outlined in our September 22, 1994 letter to you. Seven stations were operational by November 15, 1994; and the remaining two by January 1, 1995, fully equipped and programmed to collect storm samples.

An assessment of the operation of the nine monitoring stations for the Santa Monica Bay Drainage Basin was included in our mid-February status report.

**b. Monitoring Program at our MD-3 Road Maintenance Yard**

The compliance date for having implementation of a monitoring program at this facility was January 15, 1995. The monitoring program design and implementation was completed well before this date and the first sample was actually collected at the facility on January 10, 1995.

An assessment of monitoring activities that have occurred at the facility since the beginning of January 1995 was included in our mid-February status report.

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HARRY W. STONE, Director

**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE

March 13, 1995

WM-3

Ms. Catherine Tyrrell  
California Regional Water Quality  
Control Board, Los Angeles Region  
100 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Ms. Tyrrell:

**BOUNDARY CORRECTION FOR THE SANTA CLARA RIVER WATERSHED**

In response to your recent letter and in subsequent discussions with your staff, we have reviewed our hydrological data and concur with you that an adjustment of our watershed boundary for the Santa Clara River Watershed is appropriate. The area of concern is in the Lake Hughes, Elizabeth Lake, and Munz Lake general area.

Enclosed is a map illustrating the adjusted boundary. Our other maps will be adjusted accordingly. We appreciate you bringing this to our attention.

If you have any questions or require further assistance, please contact the undersigned at (818) 458-5948 or Jim Woods, of my staff, at (818) 458-3523, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Director of Public Works

Gary W. Hildebrand  
Supervising Civil Engineer III  
Waste Management Division

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LETTERS\SCRWBNDR

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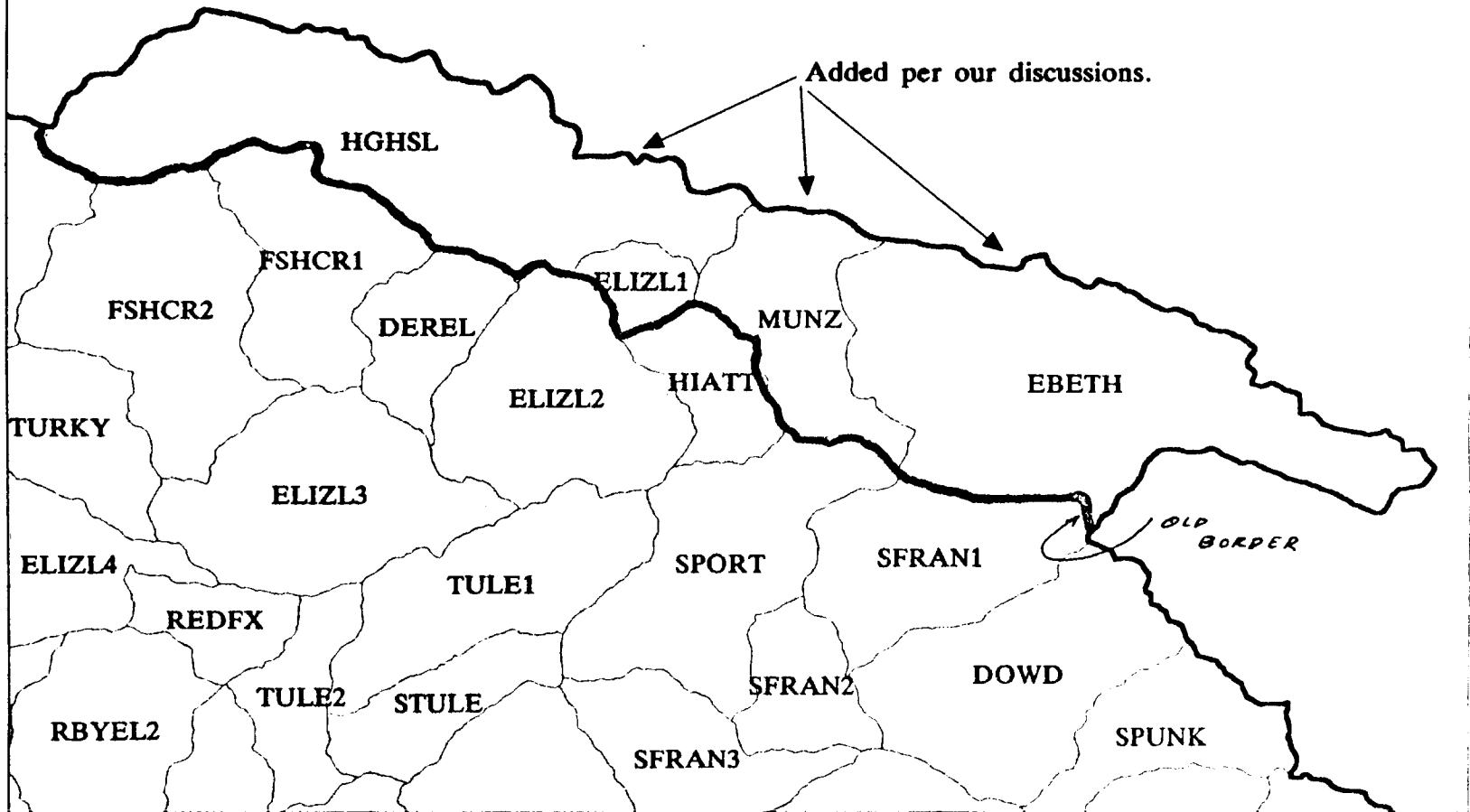
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Jim Woods (818) 458-3523

Los Angeles County  
Department of Public Works  
Waste Management Division  
Water Quality Section

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NPDES STORM WATER PERMIT MONITORING PROGRAM MEETING  
FEBRUARY 23, 1995  
9:00 - 11:00 am  
AGENDA

9:00 Purpose (M. Pumford)

Definitions (Open)

History of Monitoring Requirements for the L.A. County Program (M. Pumford)

Status of the Monitoring Program (G. Hildebrand)

Proposition A Grant Program (G. Hildebrand)

Items for the next meeting and date (Open)

11:00 Adjourn

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# MONITORING



23 Feb 1995  
Atty Gen. Brand

## DEFINITIONS

American Heritage:

To scrutinize or check systematically with a view to collecting certain specified categories of data.

WCC:

To systematically and repeatedly measure conditions in order to track changes.

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# MONITORING



CURRENT PERMIT  
June 18, 1990

## 2.0 REQUIREMENTS - YEAR 1

2.1 For each Drainage Basin, prepare and submit to the Regional Board within 12 months of the starting date for compliance, according to the schedule under 1.1:

2.1.8 A workplan for the development of a stormwater/urban runoff monitoring program, for approval by the Executive Officer, to include but not be limited to the following information :

- o listing of constituents and parameters to be monitored and the rationale for their choice.
- o listing of monitoring locations and the rationale for their choice.
- o listing of sampling methodology of choice and frequency of sampling for both wet weather and dry weather flow.
- o supplementary information that influences the design of the monitoring plan.

THE PRINCIPAL-PERMITTEE, IN THE SUBMITTAL OF THE WORKPLAN TO THE EXECUTIVE OFFICER, SHALL DEMONSTRATE THAT PUBLIC INPUT HAS BEEN OBTAINED.

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# MONITORING



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## 3.0 REQUIREMENTS - YEAR 2

3.1 For each Drainage Basin, prepare and submit to the Regional Board, for approval by the Executive Officer, within 24 months of the starting date of compliance, according to the schedule under 1.1:

3.1.1 A monitoring program based on the approved workplan. This program shall be designed to:

- o detect accurately the constituents and parameters of concern, in discharges indicated in the workplan, and to identify their possible sources.
- o identify illegal dischargers and/or locations of illicit disposal practices.

MONITORING REPORTS FOR THIS PROGRAM SHALL BE SUBMITTED ACCORDING TO THE FORMAT AND FREQUENCY TO BE APPROVED BY THE EXECUTIVE OFFICER.

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# MONITORING



SWMPC  
September 8, 1994

- I. **MONITORING** - Monitoring serves several purposes. It allows a baseline characterization of storm water/urban runoff from the MS4, it identifies the problems and their sources and evaluates impacts on receiving waters, it allows the MS4 to determine what BMPs are appropriate, and it allows a MS4 to judge the effectiveness of its BMP program. Monitoring is not limited to water sampling. It can include such elements as visual inspections of above and underground systems. The characterization of the MS4, the watershed, the storm drain system, the receiving waters and the land use was required in the previous permits. The information collected from previous efforts should be used in your baseline characterization. This plan should also tell what the future monitoring objectives are, what information will be collected, the purpose of the information, how it will be collected and used, and how the information will be analyzed, reported and stored.

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# MONITORING



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A. MS4 CHARACTERIZATION - The previous permit required a **complete** characterization of the entire system. This included the storm drain system, the receiving waters and the land use activities.

1. Watershed - Characterize each watershed including the storm drain system, the land uses and the particular problems of the receiving waters.
2. Storm drain system - Characterize all major outfalls by either sampling, visual inspections, or equivalent methods. Inlets and outlets should be inspected.
  - a. Inlets
  - b. Outlets
3. Receiving waters - Evaluate the impact of storm water runoff on receiving waters. Use existing water quality data along with current monitoring efforts to characterize and prioritize the receiving waters. Perform additional monitoring as necessary to characterize the receiving waters.
4. Streams
  - a. Lakes
  - b. Bays
  - c. Wetlands
  - d. Other habitat
5. Land use - Characterize the land use in the MS4. Characterize the storm water discharges from specific land use categories and mixed land use.
  - a. General categories
  - b. Specific features/sources

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# MONITORING



## FEDERAL REGULATIONS

November 16, 1990

*122.26(d)(2)(D) A proposed monitoring program for representative data collection for the term of the permit that describes the location of outfalls or field screening points to be sampled (or the location of instream stations), why the location is representative, the frequency of sampling, parameters to be sampled, and a description of sampling equipment.*

*122.26(d)(2)(B) Estimates of the annual pollutant load of the cumulative discharges to waters of the United States from all identified municipal outfalls and the event mean concentration of the cumulative discharges to waters of the United States from all identified municipal outfalls during a storm event (as described under Section 122.21(c)(7)) for BOD5, COD, TSS, dissolved solids, total nitrogen, total ammonia plus organic nitrogen, total phosphorus, dissolved phosphorus, cadmium, copper, lead, and zinc. Estimates shall be accompanied by a description of the procedures for estimating constituent loads and concentrations, including any modelling, data analysis, and calculation methods;*

*122.26(d)(2)(C) A proposed schedule to provide estimates for each major outfall identified in either paragraph (d)(2)(ii) or (d)(1)(iii)(B)(1) of this section of the seasonal pollutant load and of the event mean concentration of a representative storm for any constituent detected in any sample required under paragraph (d)(2)(iii)(A) of this section; and*

*122.26(d)(2)(v) Assessment of controls. Estimated reductions in loadings of pollutants from discharges of municipal storm sewer constituents from municipal storm sewer systems expected as the result of the municipal storm water quality management program. The assessment shall also identify known impacts of storm water controls on ground water.*

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SAMPLING STATUS

Ballona Creek - operational. Composites taken 1/3 & 1/10

Malibu Creek - not operational. Composite sample taken 1/3

Trancas Creek - operational. Composite taken 1/3

Kenter Drain - not operational. Composites taken 1/3

Santa Monica - operational. Composite taken 1/10

Manhattan Beach - operational. Composites taken 12/24, 1/3, 1/10, and 1/31

Palos Verdes Estates - not operational. Not sampled.

Herondo Drain - operational. Not sampled.

City of Los Angeles Drain - unknown.

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Task 2.1.9 Workplan for the development of a stormwater/urban runoff monitoring program

This workplan has not yet been submitted to the Regional Board. Public input during the development of this plan is also required prior to submittal.

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## II. EVALUATION OF THE PROPOSED MONITORING PLAN

### 1. Objectives of the Monitoring Plan

The objectives of a comprehensive Storm Water/Urban Runoff Monitoring Program must include the following:

- (a) develop a methodology to refine annual estimates of pollutant loads to Santa Monica Bay;
- (b) determine long-term trends in the quality of storm water/urban runoff;
- (c) Improve the understanding of sources of storm water pollution;
- (d) Establish effectiveness of controls (BMPs) for specific land uses, with implication for broader implementation;
- (e) identify illegal discharges or locations of illegal disposal practices; and,
- (f) monitor effects of storm water/urban runoff on receiving water quality and water quality objectives.

The proposed monitoring plan submitted by Los Angeles County includes objectives (b) through (e), but does not address (a) and (f). Staff proposes that (a) and (f) be included.

### 2. Annual Estimates of Pollutant Loads

The proposed work-plan does not discuss this objective. The permittees in their monitoring plan proposed a pilot program of nine monitoring stations in the Santa Monica watershed to evaluate storm water quality. The permittees must modify the choice of sampling stations to include the major drainage basins in the watershed and use this pilot project to make the first estimate of pollutant loads to Santa Monica Bay. It must be recognized that the number of monitoring stations need to be increased in coming years to meet the criterion of two stations per land use category.

Annual pollutant loads and event mean concentrations (EMCs) are important parameters to assess the impact of municipal storm water discharges on receiving waters. Sampling stations to estimate pollutant loads and EMCs must include drainage basins with the largest input relative to volume and predominant land-uses. A good evaluation of the relative importance of drainage basins within the Santa Monica Bay watershed is provided in a report produced for the Santa Monica Bay Restoration Project by UCLA<sup>2</sup>. Permittees are expected to select an appropriate mathematical model (e.g. QILLUDAS, SWMM, etc.) to refine and estimate pollutant loads, and for decision-making projections. While detailed dynamic modelling for the entire Basin may be too resource intensive, a simple model for the whole Basin could be augmented with a dynamic model for

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This component of the Monitoring Program is part of compliance activity under permit requirement 3.1.3. (page 11) of NPDES Permit No. CA0061654.

A detailed description of a pilot or model program to meet this objective must be submitted by July 15, 1993 and the program implemented no later than January 1, 1994.

5. Effectiveness of BMPs

The permittees discussed this objective only briefly. No specific plan is proposed to evaluate effectiveness of BMPs through monitoring.

Monitoring to evaluate the effectiveness of BMPs, and characterize the efficiency of specific controls is important in focussing available resources to achieve the most pollutant reduction. Structural controls may be evaluated in specific locations by discrete sampling and then considered for area-wide application. The effectiveness of non-structural BMPs may be evaluated locally before basin-wide implementation. Further, monitoring regional structural-BMPs routinely will forewarn the onset of operation and maintenance problems.

A detailed description of a plan to meet this objective, outlining pilot projects for immediate implementation is due January 15, 1994.

6. Illegal Discharges and Illegal Disposal Practices

The permittees mentioned this objective but did not discuss a plan to monitor illegal discharges or locations of illicit disposal practices.

Monitoring to identify sources and locations of illegal practices is essential in identifying violations that may adversely affect a storm water quality management program. A monitoring program that includes selected screening indicator parameters and flexible locations will facilitate the identification of contaminated sites or pollutant sources for additional evaluations.

A detailed description of a plan to address this objective and the area for immediate implementation must be submitted no later than January 15, 1994.

7. Receiving Water Quality

The permittees did not discuss this objective in the proposed work-plan. Receiving water monitoring is an integral requirement of all major NPDES permits.

Investigating impacts of storm water on receiving water quality is essential to protecting beneficial uses and is best approached as

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an integrated effort. Initial programs should focus on screening for in-stream toxicity of storm water and evaluation of stream sediment toxicity using biological approaches such as the triad method (i.e., bulk sediment chemistry, sediment toxicity information, and benthic community survey) in selected receiving waters (e.g., Ballona Creek at Marina del Rey, Malibu Lagoon, etc.)<sup>10,11</sup>. Such programs may be coordinated with other agencies, including the Santa Monica Bay Restoration Project, for maximum benefit.

**A detailed description of a plan to achieve this objective must be submitted no later than July 15, 1994.**

#### 8. Quality Assurance/Quality Control

The work-plan does not discuss Program Quality Assurance/Quality Control and Data Management procedures.

A QA/QC Plan should address as appropriate, (a) Standard operating procedures including, field procedures, pre-sampling mobilization, sample collection procedures, chain of custody and post sampling procedures, (b) Laboratory QA/QC, including lab compositing, detection limits and holding times and, (c) Data reduction, validation, and data reporting. Also essential are monitoring plan management, plan schedule, field crew training, and health and safety plan. Data management, including reporting and analyses, should discuss statistical methods for analysis and reporting of data (including censored data).

**A basic QA\QC Plan for the storm water monitoring program must be submitted by July 15, 1993. Specific modifications to the basic QA\QC Plan for single projects may be addressed in supplementary submittals.**

#### 9. General Comments

In addition, we have the following minor comments regarding the monitoring program:

##### i. Sampling

- o semi-volatiles should be collected as grab-samples
- o metals should be done as both soluble and total
- o Cyanide should be done as a grab sample
- o Grab samples must be collected during the first part of the storm
- o Flow weighting method is faulty; volume must be set by storm based on predicted runoff coefficients; bottles may have to be changed if storm is larger than expected
- o Minimum flow volume for dry weather analysis must be reported
- o Dry weather sampling should be done as a 24-hr composite (except for bacteriological indicators, Ph, cyanide, oil and grease, semi-volatile organic compounds).

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ii. Equipment :

- o Samplers must be continuously maintained and pre-storm checked
- o Provide details on sampling and flow equipment, and data storage required.
- o Number of bottles in sampler and volume available not described.
- o Equipment housing procedures must be presented.

10. References

The following section lists references used by Board staff in its review of the monitoring plan and are sources that permittees may find useful in addressing our comments.

MONITORING

1. Guidance Manual for the Preparation of Part 2 of the NPDES Permit Application for Discharges from Municipal Separate Storm Sewer Systems, 1992, EPA 833-B-92-002, USEPA OWEC [Contact EPA Storm Water Hotline at (703)821-4823]
2. Assessment of Storm Drain Sources of Contaminants to Santa Monica Bay , Vols. 1-4, Santa Monica Bay Restoration Project. 1993. [Contact Guang-yu Wang, SMBRP, (213)266-7568], (UCLA and WCC)
3. NPDES Storm Water Sampling Guidance Document, USEPA 1992, EPA 833-B-92-001, [Contact EPA Stormwater Hotline at (703)821-4823]
4. Amended Monitoring Plan, Santa Clara Valley Non-point Source Pollution Control Program, December 9, 1991. [Contact Marcia Guzetta at (408)265-2600, (WCC)].
5. Guidelines for Monitoring of Urban Runoff Quality, MERL, OH, EPA-600/2-83-124, 1983, prepared for Urban Drainage and Flood Control District, Denver, CO, (Michael B. Sonnen) [Contact NTIS at (703)487-4650].
6. Analyzing Urban Runoff in the Dallas-Fort Worth Area, M.A. Collins et al. (undated) (WCC). [Contact WCC at (800)776-3296]
7. Source Identification and Control Report, 1992. Santa Clara Valley Non-point Source Pollution Control Program. [Contact Marcia Guzetta at (408)265-2600, (WCC)]

RECEIVING WATER

8. Annual Report, 1990/1991 Monitoring Program NPDES Permit 90-158, Sacramento County Water Agency, July 1, 1991. [Contact Donna Dean, County of Sacramento, (916) 440-6851] (Brown and Caldwell).
9. Annual Report, 1991/1992 Monitoring Program NPDES Permit 90-158,

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Sacramento County Water Agency, July 1, 1991. [Contact Donna Dean, County of Sacramento, (916)440-6851] (Brown and Caldwell)

10. Sediment Quality and Aquatic Life Assessment, W.J. Adams et al. 1992, Environ. Sc. Technol., Vol 26(10), pp 1865-1875.

11. Sediment Toxicity Testing, G.A. Burton and J. Scott, 1992, Environ. Sc. Technol., Vol 26(11), pp 2068-2075.

#### DATA MANAGEMENT

12. UNCENSOR: A Program to Estimate Means and Standard Deviations for Data Sets with Below Detection Limit, M.C. Newman and P.M. Dixon, 1990, American Environmental Laboratory, April 1990, pp 26-30.

13. UNCENSOR Version 3.0, Newman, M. et al. 1992. [Contact Michael Newman, Savannah River Ecology Laboratory (803) 725-2472], (University of Georgia).

14. MDL Program, D.R. Helsel 1992, Water Resources Div., USGS, [Contact USGS at (703) 860-6000]

15. Less than Obvious: Statistical Treatment of Data below the Detection Limit, D.R. Helsel, 1990, Environ. Sci. Technol., Vol. 24(12), pp 1766-1774.

16. Modelling of Non-point Source Water Quality in Urban and Non-urban areas, Donigan and Heber, 1991, USEPA, ERL, Athens, GA, [Contact USEPA, ERL at (706) 546-3549].

17. Estimation of Descriptive Statistics for Multiple Censored Water Quality Data, D.R. Helsel and T.A. Cohn, 1988, Water Resources Research Vol. 24(12) 1997-2004.

18. The Detection Limit, P.S. Porter et al., 1988, Environ. Sci. Technol. Vol. 22(8), pp 856-861.

19. Statistical Methods in Water Resources, D.R. Helsel and R.M. Hirsch. 1992, Studies in Environmental Science 49, Elsevier Science Publications, New York, NY. 522 pp.

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- b. Test and integrate a selected stormwater model into the monitoring program to refine annual estimates of pollutant loads to Santa Monica Bay.

Status: The basinwide pollutant load model is operational and will be able to calculate refined pollutant load estimates once event-mean concentration values for various pollutants are available from the monitoring program data.

The EPA Stormwater Management Model developed for Kenter Canyon is operational and has been run using historical data.

- c. Implement targeted monitoring to identify sources of specific toxic pollutants in stormwater and urban runoff in the Santa Monica Bay Drainage Basin. The initial source targeted may include municipal corporation facilities.

Status: Implementation of monitoring at our County Road Maintenance District Yard No. 3 began January 10, 1995, when a complete set of discrete samples were collected from the storm of that date. Another complete set of samples were collected from the storm of January 23, 1995. Both sets were delivered to our Lab for analysis.

- d. Develop and begin implementation of a monitoring program to evaluate effectiveness of specific BMPs in the Santa Monica Bay Drainage Basin.

Status: We have completed development of a uniform data collection format for the 13 baseline BMPs to collect information on BMP implementation for use in assessing BMP effectiveness. A copy of the forms was provided to you in our January report. The County has begun modifying its procedures to allow for the use of this collection format for our operations Countywide. We will continue to work with the other Permittees to establish a format to be implemented by all agencies. The data collected will be used to assess BMP effectiveness during future Annual Reports.

- e. Implement a monitoring program to identify locations of illegal practices and to eliminate pollutant sources in the Santa Monica Bay Drainage Basin.

Status: Inspection reports for December 1994 and January 1995 are enclosed.

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AUTOMATED MONITORING STATIONS  
OPERATING HISTORY  
(2/13/95)

STATION	HISTORY	PRESENT STATUS
Ballona Creek	Installed 3/94. Storm of 12/24/94: No composite collected due to power malfunction. Storm of 1/3/95: Composite samples collected and take to lab on 1/5/95. Storm of 1/10/95: Composite sample collected and taken to lab on 1/13/95.	Operational
Malibu Creek	Installed 10/94 Storm of 12/24/94: Composite sample not collected due to probable clogged tubing. Storm of 1/3/95: Composite sample collected and taken to Lab on 1/9/95. Storm of 1/10/95: Severe flooding in area prohibited inspection of station until 1/19/95. Evidence showed that auxiliary pump was submerged for considerable time and not currently operating.	Not operating. Service personnel to inspect auxiliary pump this week.
Trancas Creek	Installed 7/94 Storm of 12/24/94: No appreciable runoff. Storm of 1/3/95: Composite sample collected and taken to Lab on 1/9/95. Storm of 1/10/95: No composite sample collected due to clogged tubing. Tubing cleared 2/10/95.	Operational
Kenter Drain	Installed 7/94 Storm of 12/24/94: Composite samples not collected due to clogged tubing. Tubing cleared 12/27. Storm of 1/3/95: Composite samples collected and taken to Lab on 1/9/95. Storm of 1/10/95: No composite sample collected due to disconnected tubing. Tubing reconnected 2/3/95.	Not operating. Tubing probably clogged. Service personnel to inspect tubing this week.

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STATION	HISTORY	PRESENT STATUS
Pier Drain - Santa Monica	Installed 12/94 Storm of 12/24/94: No composite sample collected due to electronics malfunction. Storm of 1/3/95: No composite sample collected due to electronics malfunction. Storm of 1/10/95: Composite samples collected and taken to the Lab on 1/13/95. 24-hr Dry Weather composite set-up 1/31/95, but no flow detected.	Operational
Project 5401 - Manhattan Beach	Installed 11/94 Storm of 12/24/94: Composite sample collected and taken to Lab on 12/27/94. Storm of 1/3/95: Composite samples collected and taken to Lab on 1/5/95. Storm of 1/10/95: Composite samples collected and taken to Lab on 1/13/95. 24-hr Dry Weather composite collected 1/31/95 and taken to Lab on 2/1/95.	Operational
Project 558 - Palos Verdes Estates	Installed 11/94 Storm of 12/24/94: No composite samples collected due to malfunctioning pressure transducer. Transducer replaced 12/27/94. Storm of 1/3/95: Station severely damaged. Transducer ripped out, grate broken, angle iron bent. Storm drain also suffered structural damage.	Not operating. Required repairs identified. Will be repaired when weather permits, but probably not before the end of February.
Herondo Drain	Installed 12/29/94 Storm of 1/3/95: No composite samples collected due to malfunctioning auxiliary pump. Storm of 1/10/95: No composite samples collected due to malfunctioning auxiliary pump. Pump rewired 2/3/95.	Operational

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ILLICIT DISCHARGE INSPECTION REPORT

REPORTING PERIOD December 1994

OPEN CHANNEL	AREA INSPECTED		ILLCIT DISCHARGE	
	FROM	TO	NUMBER OBSERVED	COMMENTS
Ballona Creek	Dunsmuir Ave City of Los Angeles	405 FWY	1	1 - Oil sheen entering channel from City of Los Angeles Drain referred to City of Los Angeles Storm Management Division (LASMD)
Pacoima Wash	Glenoaks Blvd	5th Street	2	2 - Sites issued notices to cease discharge and conduct site assessment/remediation.
Upper Los Angeles River	Station 660+00	Station 948+00	3	2 - Sites located within City of Los Angeles. Referred to LASMD. 1 - Site on going, joint investigation with LASMD, LACDPW, and LACoFire HAZMAT.
Aliso Creek	Full	Reach	2	1 - Site located within City of Los Angeles Joint inspection conducted (LASMD and LACDPW) illicit discharge resolved. 1 - Site located within City of Los Angeles, referred to LASMD.
Burbank Western	Full	Reach	6	1 - Site located within City of Burbank, referred to City of Burbank, City obtained compliance. 5 - Sites, compliance obtained in field by LACDPW.
Tujunga Wash	Station 2+00	Station 146+00	—	NONE
Tujunga Wash	Station 146+00	Station 499+00	—	NONE
Santa Susana Creek	Station 41+00	Station 200+00	4	1 - Site, search warrant served jointly by City of L.A. Bureau of Sanitation, LACoFire HAZMAT, and LACDPW. 3 - Sites located within City of Los Angeles referred to LASMD.

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ILLICIT DISCHARGE INSPECTION REPORT

REPORTING PERIOD December 1994

OPEN CHANNEL	AREA INSPECTED		ILICIT DISCHARGE	
	FROM	TO	NUMBER OBSERVED	COMMENTS
Wilbur Creek	Full	Reach	—	NONE
East Canyon Channel	Station 70+50	—	1	1 - Site located within City of Los Angeles. Joint inspection conducted (LASMD and LACDPW) illicit discharge resolved.

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ILLICIT DISCHARGE INSPECTION REPORT

REPORTING PERIOD January 1995

OPEN CHANNEL	AREA INSPECTED		ILLICIT DISCHARGE	
	FROM	TO	NUMBER OBSERVED	COMMENTS
Sepulveda Channel	Full	Reach	—	NONE
Sawtelle Channel	Full	Reach	—	NONE
Centinela Creek	Full	Reach	—	NONE
Benedict Canyon	Full	Reach	—	NONE
Rexford Channel	Full	Reach	—	NONE

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Mark Pumford  
February 8, 1995  
Page 2

3. Construction Site Runoff Control -- the permit should require specific aspects of a construction site runoff control program, including enforcing the State NPDES construction permit, setting requirements for construction sites, mandating the preparation of Stormwater Pollution Prevention Plans ("SWPPPs"), reviewing the SWPPPs, and requiring inspections. These requirements should cover all construction sites, including new and redevelopment sites, and cover sites of any acreage.

4. Industrial Runoff Control -- the permit should require specific aspects of an industrial runoff control program, including enforcing the State NPDES industrial permit, setting requirements for industrial facilities, mandating the preparation of Stormwater Pollution Prevention Plans ("SWPPPs"), reviewing the SWPPPs, and requiring inspections.

5. Water Quality Monitoring -- the permit should require the County and each co-permitter (a) to identify and map the watershed characteristics in their jurisdictions to calculate potential runoff volumes, pollutant sources, and exacerbating factors and (b) to extrapolate from water quality and quantity data from areas with similar watershed characteristics to estimate runoff pollutant quantities and to select BMPs. Similarly, it should be the responsibility of each co-permitter to monitor the effectiveness of BMPs.

This work should have been performed under the current municipal stormwater permit, but in most instances has not been adequately performed.

In addition, more specifics should be provided for comprehensive water quality monitoring to guide the County in its monitoring program.

6. More specific public education programs should be required, for example including those addressing illegal dumping and education of commercial and industrial facilities and homeowners.

B. ADD TO MENU OF MEASURES THAT MUST BE ANALYZED

1. Co-permittees should evaluate the need and feasibility for retrofitting catch basins where it would benefit water quality. We found in our lawsuit against Caltrans that almost all of Caltrans "catch basins" are "catch basins" in name only -- in reality they have no room for pollutants to be caught and, instead, merely channel those pollutants directly into the storm drain system. We are concerned that other County "catch basins" may be similarly designed.

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Mark Pumford  
February 8, 1995  
Page 3

2. The permit should require the analysis of specific source and treatment controls for implementation at facilities owned or operated by the County or the co-permittee (including industrial facilities, outdoor storage facilities, parking lots, maintenance facilities, construction sites). (See Report of Dr. Richard Horner dated January 1995 for examples of specific source and treatment controls that should be analyzed under an MEP standard.)

3. The measures outlined in Menu "C" should be combined with Menu "B" and analyzed by the County and all co-permittees.

As we discussed at our meeting, we hope that the new permit will contain a definition for the "maximum extent practicable" standard similar to that ordered by Judge Rafeedie in the Caltrans case (based on his interpretation of the Clean Water Act). In addition, as we discussed, it is important that the permit make clear that any continuing violations of the current municipal stormwater permit are a violation of the new permit.

We look forward to working with you on stormwater issues.

Sincerely,



Gail Ruderman Feuer  
Senior Attorney

cc: Catherine Tyrell  
Mark Gold  
Terry Tamminen  
Jorge Leon, Esq.

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LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS  
900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331



TELECOPY COVER SHEET

DATE: 2/1/95  
TIME: 3:37

TO:

Name: Carlos Urrunaga  
Agency: CRWQCB  
Telephone Number: (213) 266-7598  
Telecopier Number: (213) 266-7626

FROM:

Name: Frank Kuo  
Division: WASTE MANAGEMENT/WATER QUALITY SECTION  
Telephone Number: (818) 452-6989  
Telecopier Number: (818) 452-5584

NUMBER OF PAGES (including cover sheet) 2

REMARKS: \_\_\_\_\_  
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TIME IN

DEPARTMENT OF PUBLIC WORKS  
ILLEGAL DUMPING COMPLAINT

TIME OUT

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HELP/4357

STORMWATER UNIT  
CODE NUMBER \_\_\_\_\_

CALLER \_\_\_\_\_  UNKNOWN

AGENCY:  L.A.C.DEPT  HAZMAT  CITY  SHF/PD/CHP  FIRE  CTEN  
 OTHER \_\_\_\_\_ PHONE \_\_\_\_\_

COMPLAINT

Dumping/Discharge  Spill/Leak  Solid Waste  Other \_\_\_\_\_

Material: \_\_\_\_\_

Discharger Name/Bus. \_\_\_\_\_

Address \_\_\_\_\_  Same As Above

Cross Street \_\_\_\_\_

Description of Vehicle \_\_\_\_\_ Lic.# \_\_\_\_\_

TO:  C.B./Drain  Channel  Street  Private Property  Other \_\_\_\_\_

When Did It Happen?  Now  Continuous  Other \_\_\_\_\_

Additional Description \_\_\_\_\_

City of \_\_\_\_\_  County Unincorporated Area T.G. \_\_\_\_\_  
Page \_\_\_\_\_ Grid \_\_\_\_\_

REFERRAL/NAME

LACDPW:  FLD YD \_\_\_\_\_  RD YD \_\_\_\_\_  OTHER L.A. COUNTY \_\_\_\_\_

CONTACT PERSON \_\_\_\_\_ PHONE \_\_\_\_\_

CITY OF: \_\_\_\_\_ DEPT. \_\_\_\_\_ NAME/OPER# \_\_\_\_\_

COMMENTS \_\_\_\_\_

Taken by: \_\_\_\_\_ Dispatch by: \_\_\_\_\_ Cancelled by: \_\_\_\_\_

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COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

HARRY W. STONE, Director

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ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

January 31, 1995

IN REPLY PLEASE  
REFER TO FILE:

WM-3

Dr. Robert P. Ghirelli  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Dr. Ghirelli:

**CONFIRMATION OF JANUARY 10, 1995 MEETING**

This letter serves as confirmation of the discussion at a meeting on January 10, 1995, among myself, Dave Yamahara, Brian Hooper, and Gary Hildebrand, of my staff, Catherine Tyrrell, Dennis Dasker, Mark Pumford, and Carlos Urrunaga, of your staff.

At this meeting, Catherine Tyrrell indicated that the Report of Waste Discharge was acceptable as the Permit renewal application. She further stated that the six proposed stormwater management plans included in the Report of Waste Discharge would need additional information in order to serve as the basis for the next Permit. She indicated that the Regional Water Board will be holding a series of individual meetings with a select group of the Santa Monica Bay Drainage Basin Permittees, the Executive Advisory Committee, and various Environmental Groups to obtain additional information to be incorporated into the new Permit.

Ms. Tyrrell asked for, and received, our agreement to work with the Regional Water Board through these proposed meetings, and again indicated that the Report of Waste Discharge was acceptable as an application.

If you have any questions regarding this matter, please contact me at (818) 458-4002.

Very truly yours,

HARRY W. STONE  
Director of Public Works

*James A. Noyes*

JAMES A. NOYES  
Chief Deputy Director

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**NPDES STORM WATER PERMIT RENEWAL MEETING  
REPRESENTATIVES OF SANTA MONICA BAY CITIES  
JANUARY 17, 1995  
1:30 - 3:30pm**

**AGENDA**

1. Introductions and Meeting Objectives (Catherine)
2. Discussion of Report of Waste Discharge letter to LA County January 13, 1995 (Catherine)
3. Draft Schedule for Permit Preparation (Mark)
4. Overview of Objectives in Developing Permit Requirements (Carlos)
5. Adjourn

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NPDES PERMIT  
MEETING - JANUARY 17, 1995

<u>Name</u>	<u>Affiliation</u>	<u>Phone</u>
Brian Hoover	L A Co DPH	818-458-5118
BILL DePinto	"	818-458-3527
Craig Perkins	City of Santa Monica	(310) 458-8221
Phil Richardson	City of LA	213 847 6346
David B. Talcott	City of LA	213-847-6347
Thomas H. Lanning	CRAGGS-CIT	213 266 7598
Catherine Lynell	LARWACB	213 266-7515
Mark Rumbold	RWACB-LA	(213) 266-7596
NEIL MURPHY	CITY M. S.	310-595-5221
AMY AMIRANI	CITY OF HERMONA BEACH	310-318-0211
ED SCHROEDER	CITY OF EL SEGUNDO	310 322-4670
Jim TRURAN	Beverly Hills	310-285-2501
Guang-yu Wang	SMBRP	213-266-7568
DELL ALVAREZ	CITY OF REDONDO BEACH	310-318-0672
FRANK KUO	L.A.C.D.P.W.	(818) 458-6989
Gary Hildebrand	L A C D P W	(818) 458-5992
DAVID YAMAHARA	"	318-458-3500

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

11 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600

January 13, 1995

Jim Noyes  
County of Los Angeles  
Department of Public Works  
900 South Fremont Avenue  
Alhambra, CA 91803-1331

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL  
STORM WATER DISCHARGE PERMIT, NPDES RENEWAL APPLICATION  
LETTER OF RECEIPT (NPDES No. CA0061654, CI File No. 6948)**

Under Title 40 of the Code Federal Regulations 122.21(d)(2), a National Pollutant Discharge Elimination System permit renewal application must be submitted to the permitting authority 180 days prior to the current permit expiration date. On December 21, 1994, this Regional Water Quality Control Board received the County of Los Angeles and Co-Permittees' NPDES permit renewal application package consisting of eight volumes of the Report of Waste Discharge (ROWD). Included in the ROWD were six distinct Storm Water Management Plans (SWMPs) for the six watershed management areas:

1. Santa Monica Bay - Malibu Creek and other Rural Areas;
2. Santa Monica Bay - Ballona Creek and other Urban Areas;
3. Dominguez Channel/Los Angeles Harbor Drainage Areas;
4. Los Angeles River;
5. San Gabriel River; and,
6. Santa Clara River.

Based upon our initial review, the ROWD is deemed acceptable as the permit renewal application. However, the SWMPs, in particular those for the Santa Monica Bay Watershed Management Areas, need additional information to serve as the core provisions for permit renewal.

The Santa Monica Bay SWMPs do not adequately incorporate what has previously been learned either in the current municipal storm water discharge permit or through the Santa Monica Bay Restoration Project, a National Estuary Program established under Section 320 of the Federal Clean Water Act.

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Jim Noyes  
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Therefore, it is our intent to prepare six (6) municipal storm water permits that will be based on your submitted ROWD. It is also our intent that the permits for the Santa Monica Bay Watershed Management Areas include an accelerated implementation schedule to reflect their lead in the staggered phasing of the current permit. We also plan to work with a core group of agencies representing the Co-Permittees and several environmental groups to determine what additional requirements and/or provisions will be incorporated into the draft permits to supplement the information in the two SWMPs for the Santa Monica Bay. Based upon the Santa Monica Bay experience, additional permit conditions which supplement the other SWMPs for the remaining areas will be developed. These additional draft permit conditions will then be distributed to the public, the Executive Advisory Committee, and the other Co-Permittees for review and comments. A schedule is under development.

If you should have any questions in regards to this matter, please call me at (213) 266-7515 or have your staff call Carlos M. Urrunaga at (213) 266-7598.

*Catherine Tyrrell*

CATHERINE TYRRELL  
Assistant Executive Officer

cc: Jorge León, Office of the Chief Counsel, State Water Resources Control Board  
Catherine Kuhlman, United States Environmental Protection Agency, Region IX  
Gary Hildebrand, Department of Public Works, County of Los Angeles

ControlAndManagement, Inc

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HARRY W. STONE, Director

*CI-1*  
**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

*What month being monitoring*  
ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE:

WM-3

January 12, 1995

Dr. Robert P. Ghirelli  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Dr. Ghirelli:

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
PERMIT NO. CA0061654, CI 6948, BOARD ORDER NO. 90-079  
ACTION ITEM PROGRESS REPORT**

In accordance with our agreement with you, as specified in our September 22, 1994 letter, we are reporting our progress in completing the monitoring program action items. We are also addressing the comments in your December 21, 1994 letter regarding our progress report letter dated December 14, 1994.

- a. Render operational an initial monitoring network of nine stations to establish long-term trends in stormwater quality in the Santa Monica Bay Drainage Basin. Seven stations are to be made operational by November 15, 1994, and two by January 1, 1995.

Status: As previously reported, seven stations were completed and operational as of November 15, 1994. The remaining two stations were completed and operational as of December 29, 1994. This completes the installation of the nine required monitoring stations in the Santa Monica Bay Drainage Basin.

Each station is comprised of state-of-the-art sampling equipment which has been custom modified to meet the unique conditions of our storm drain system. To the best of our knowledge, we are the first agency to attempt to put in place such a system utilizing special equipment for stormwater sampling. Each site has been initially programmed during dry weather with uniform flow, if any, and under stable conditions. These sites have yet to be fully tested during the often turbulent and rapidly changing conditions that occur during storm events. During the balance of this storm season, we will be observing and evaluating the performance of the

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Dr. Robert P. Ghirelli  
January 12, 1995  
Page 2

sampling equipment so that the equipment configuration and programming can be adjusted to best collect the needed samples. Therefore, it is unknown as to the number of storm events that will be successfully sampled at each site by the end of this storm season.

The severe storm that occurred January 4 and 5, 1995, caused structural damage to our storm drain Project No. 558 in the City of Palos Verdes. The monitoring station installed on the drain was also damaged, and at this time it is not known when the drain can be repaired and the monitoring station again rendered operational. As a result of the recent series of storms, other stations are also not operating properly. As crews become available, we will be doing a full assessment of the nine monitoring stations.

The following action items were completed by January 15, 1995.

- b. Test and integrate a selected stormwater model into the monitoring program to refine annual estimates of pollutant loads to Santa Monica Bay.

Status: The basinwide pollutant load model is operational and will be able to calculate refined pollutant load estimates once event-mean concentration values for various pollutants are available from the monitoring program data. Enclosed is a typical report for a watershed.

The EPA SWMM model developed for Kenter Canyon is operational and has been run using historical data. Enclosed is a report on the model.

- c. Implement targeted monitoring to identify sources of specific toxic pollutants in stormwater and urban runoff in the Santa Monica Bay Drainage Basin. The initial source targeted may include municipal corporation facilities.

Status: Implementation of monitoring at our County Road Maintenance District Yard No. 3 began January 10, 1995. See enclosed work plan for details.

- d. Develop and begin implementation of a monitoring program to evaluate effectiveness of specific BMPs in the Santa Monica Bay Drainage Basin.

Status: We have completed development of a uniform data collection format for the 13 baseline BMPs to collect information on BMP implementation for use in assessing BMP

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Dr. Robert P. Ghirelli  
January 12, 1995  
Page 3

effectiveness. A copy of the forms is enclosed. The County has begun modifying its procedures to allow for the use of this collection format for our operations Countywide. We will continue to work with the other Permittees to establish a format to be implemented by all agencies. The data collected will be used to assess BMP effectiveness during future Annual Reports.

- e. Implement a monitoring program to identify locations of illegal practices and to eliminate pollutant sources in the Santa Monica Bay Drainage Basin.

Status: Storm drain inspections to identify illegal discharges/disposal practices in Ballona Creek in the Santa Monica Bay Drainage Basin began December 5. Inspections of Pacoima Wash in the Upper Los Angeles River Drainage Basin began December 1. Enclosed is a copy of the work plan for this program. Due to the severity of storms since the beginning of the year and the subsequent commitment of field forces, a progress report for the month of December 1994 will be submitted with the next monthly report.

- f. Advertise a Request for Proposal to develop a program to evaluate stormwater impacts on selected receiving waters including conducting toxicity studies in the Santa Monica Bay Drainage Basin.

Status: Notices advertising the Request for Proposal were mailed to 130 prospective consultants on December 22, 1994. A copy of the RFP is enclosed. The RFPs are to be submitted by February 1, 1995.

- g. Submit a revised monitoring program for Phases II and III that includes all program elements with timelines for development and implementation.

Status: Enclosed is the revised monitoring program for Phases II and III which includes all program elements.

Installation of the 15 monitoring stations in Phases II and III for operation by October 1995, the start of the next rainy season, will necessitate that we begin detailed design of these sites in January 1995. Therefore, we are requesting your approval of the five mass emission sites originally proposed to you on July 1, 1994, by January 31, 1995, and the additional ten sites by February 26, 1995.

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Dr. Robert P. Ghirelli  
January 12, 1995  
Page 4

If you have any questions regarding this matter, please contact the undersigned at (818) 458-3500, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Director of Public Works

  
DAVID YAMAHARA  
Assistant Deputy Director  
Waste Management Division

GH:11  
LETTERS\PRGRS1.95

Enc.

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**COMMON NON-STORMWATER DISCHARGES TO THE STORM DRAIN SYSTEM**

LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS  
Waste Management Division

PAGE .002

JAN 4 '95 14:52 FROM WASTE MGMT-WATER GLTY

Above Ground Tank Containment Area (unpounded) Stormwater	with NPDES Permit	A	P		
Air Conditioning Condensation (commercial)	with NPDES Permit	A	P <sup>1</sup>		<sup>1</sup> use for irrigation
Boiler Blowdown	no	A	P	A	
Car/Truck Washing (commercial or fleet)	no	A	P	A	
Car Washing (individual residential)	yes		P <sup>2</sup>		<sup>2</sup> use biodegradable soap & wash on permeable surface
Carpet Cleaning Solutions	no	P			discharge to licensed operator
Clean-up wastewater from site	no	P			contain and remove from site
Commercial Building Washing (exterior)	with NPDES Permit		P	A	
Concrete/Plaster Vehicle or Equipment Washdown	no	A	P	A	
Construction activities runoff (dry season)	no	A		A	contain and remove from site
Cooling Tower Bloodoff	no	A	P	A	
Dewatering, Construction	with NPDES Permit		P		

P = Preferred Option

A = Acceptable Option

NDP = Treatment, Storage, & Disposal Facility

R0032740

PAGE.083

JAN 4 '95 14:53 FROM WASTE MGMT-WATER GLTY

Dewatering, Multi-Unit Residential (french drains, sump pumps)	with NPDES Permit	A			
Dewatering, Single Family Residential (french drains, sump pumps)	with NPDES Permit	.	P		
Dewatering, Utility Vault	with NPDES Permit	A	P		
Diversion Systems for Stormwater	with NPDES Permit	A <sup>3</sup>			<sup>3</sup> must retain runoff for 24 hours after storm
Dumpster Cleaning Water	no	P			contain and dispose
Excess Landscape Irrigation	yes <sup>4</sup>		P <sup>5</sup>		<sup>4</sup> must not be a nuisance <sup>5</sup> reduce amount
Fire Fighting Flows	yes <sup>6</sup>	A		A	<sup>6</sup> contain and dispose if contaminated
Fire Sprinkler System Test/ Maintenance Water	no	A		A	
Groundwater Pumped for Cleanup Operations	with NPDES Permit		A <sup>7</sup>		<sup>7</sup> re-inject into subsurface
Groundwater for Well Development	with NPDES Permit		P <sup>8</sup>		<sup>8</sup> use for irrigation
Hazardous Material Disposal (motor oil, antifreeze, paint, etc.)	no		P <sup>9</sup>	A	<sup>9</sup> gas station or recycling center
Hazardous Material Loading/Unloading Areas Washdowns	no	P		A	
Hazardous Material Storage Areas, Washdowns	no	P		A	
Hazardous Material Storage Areas, Sprinkler System Flows	no			P <sup>10</sup>	<sup>10</sup> contain for disposal

P = Preferred Option

A = Acceptable Option

SDF = Treatment, Storage, & Disposal Facility

PAGE 004

JAN 4 '95 14:54 FROM WASTE MGMT-WATER QLTY

Horse Stable/Kennel Washdowns	no	A	P	A	
Hydrotest Water for Pipelines or Tanks	with NPDES Permit <sup>11</sup>	A	P	A	<sup>11</sup> permit not required for fire hydrant pressure tests
Indoor Catch Basins	no	A	P	A	
Industrial Waste	with NPDES and Industrial Waste Permits	A			
Sanitary Landfill Surface Runoff	with NPDES Permit	A	P		
Ornamental Pond Drainage (municipal or commercial)	with NPDES Permit		P		
Parking Lot Washdowns	with NPDES Permit		P		
Paved Areas Washdowns (in commercial & business districts)	with NPDES Permit		P		
Portable Steam Cleaning/Washing Equipment	no	A	P	A	
Potable or Reclaimed Intermittent Water System Discharge (for maintenance purposes)	with NPDES Permit <sup>12</sup>			A	<sup>12</sup> dechlorinate by chemical addition, aeration and/or retention
Reclaimed Water, Tertiary Treated	with NPDES Permit		P		
Restaurant Equipment or Filter Cleaning	no	A	P		
Roof Drains	yes		P <sup>13</sup>		<sup>13</sup> use for irrigation
Street Washdowns	with NPDES Permit	A	P	A	
Water Filter Backwash/Cleaning from Swimming Pool, Spa, Fountain	no	A	P	A	

P = Preferred Option

A = Acceptable Option

SDF = Treatment, Storage, & Disposal Facility

PAGE 005

Swimming Pool, Spa, Fountain Water Drainage, Public	with NPDES Permit		P		
Swimming Pool, Spa, Fountain Water Drainage, Residential	yes <sup>14</sup>		P	A	<sup>14</sup> pending chlorine content and down-stream water uses (dechlorinate by chemical addition or exposure to sunlight)

JAN 4 '95 14:55 FROM WASTE MGMT-WATER GLTY

PLDISCHARGE 17  
May 10, 1994

\*\* TOTAL PAGE 005 \*\*

R0032743

P = Preferred Option    A = Acceptable Option    TSDF = Treatment, Storage, & Disposal Facility

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGIONCENTRE PLAZA DRIVE  
STEREY PARK, CA 91734-2156  
(213) 266-7300  
FAX: (213) 266-7600

January 4, 1995

Mr. Jim Noyes  
County of Los Angeles  
Department of Public Works  
900 South Fremont Avenue  
Alhambra, CA 91803-1331**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL STORM  
WATER DISCHARGE PERMIT (NPDES No. CA0061654, CI File No. 6948)**

Under Title 40 of the Code Federal Regulations 122.21(d)(2), a National Pollutant Discharge Elimination System permit renewal application must be submitted to the permitting authority 180 days prior to the current permit expiration date. On December 21, 1994, this Regional Water Quality Control Board received the County of Los Angeles and Co-Permittees' NPDES renewal application package consisting of eight volumes. However, the appropriate fees were not received. Included in the submittal were six Storm Water Management Plans for six distinct watershed management areas including the:

1. Santa Monica Bay - Malibu Creek and other Rural Areas;
2. Santa Monica Bay - Ballona Creek and other Urban Areas;
3. Dominguez Channel/Los Angeles Harbor Drainage;
4. Los Angeles River;
5. San Gabriel River; and the
6. Santa Clara River.

The six Storm Water Management Plans are separate Municipal Storm Water Discharge Permit Applications. It is this Regional Board's intent to issue six distinct Municipal Storm Water Discharge Permits at the June 12, 1995, Regional Board meeting. Under Title 23, California Code of Regulations, Section 2200, the annual permit fee for an NPDES area-wide urban storm water discharge permit is \$10,000 for populations greater than 100,000. The appropriate fee due to the State Water Resources Control Board is \$60,000.

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Mr. Jim Noyes  
Page 2

If you should have any questions in regards to this letter, please call me at (213) 266-7510 or have your staff call Carlos M. Urrunaga at (213) 266-7598.

*Robert P. Ghirelli*

ROBERT P. GHIRELLI, D.Env.  
Executive Officer

cc: Jorge León, Office of the Chief Counsel, State Water Resources Control Board  
Gary Hildebrand, Department of Public Works, County of Los Angeles

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**RECOMMENDED PROGRAM FOR URBAN RUNOFF POLLUTANT CONTROL FOR  
LOS ANGELES COUNTY AND CO-PERMITTEES SUBJECT TO STORMWATER  
NPDES PERMIT**

Report to  
Natural Resources Defense Council  
Los Angeles Office

By  
Richard R. Horner

230 NW 55 Street  
Seattle, WA 98107

(206) 782-7400

January 1995

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## INTRODUCTION

Provisions of the federal Clean Water Act and court decisions pursuant to the legislation require certain municipalities to obtain permits under National Pollutant Discharge Elimination System (NPDES) authority for the discharge of stormwater to natural surface waters. Operation of the program is delegated to states in most cases, including California's. California exercises its authority through the State Water Resources Control Board, which manages water quality through Regional Water Quality Control Boards (RWQCB). The RWQCB for the Los Angeles region has specified requirements and provided guidance for NPDES permit submittals for the municipalities in its region. The permit is being implemented with the County of Los Angeles as principal permittee and all cities and other recognized entities as co-permittees. Organizing with respect to major drainage basins, the regional board has stated conditions applicable to the affected municipalities within each basin.

The RWQCB provided the co-permittees through its Order No. 90-079 (June 25, 1990) with instructions on what elements were to be included in their nonpoint pollutant control programs, and the order and timing for the various activities. The program schedule was intended to be followed in a step-wise manner, so that each prior effort helps to build a foundation for subsequent work. A lack of satisfactory completion of the early steps will handicap later activities. In their review of second-year compliance (June 17, 1993), the RWQCB supplemented their earlier instructions with a list of 13 Baseline Best Management Practices (BBMPs) required in each program developed under the permit.

A central task in Order No. 90-079 is Task 3.1.2, which required a plan appropriate for the co-permittee's circumstances to control pollutants to the maximum extent practicable (emphasis added). The RWQCB in its second-year review stated that the BBMPs listed there will not entirely satisfy the requirements but serve as a minimum.

The Natural Resources Defense Council (NRDC) in Los Angeles requested recommendation of a comprehensive runoff control program that would fully comply with NPDES requirements. This report presents such a program and discusses its development and composition. The recommended program elements are considered to represent a complete response that would entirely satisfy RWQCB requirements, including control of pollutants to the maximum extent practicable.

This report provides supporting materials to two tables following the narrative. Table 1 concisely presents the recommended program elements. Table 2 relates the recommended program to the RWQCB requirements, as given in Order No. 90-079 and the review of June 17, 1993, and the specified dates of compliance. The elements are identified by an alphanumeric system in the tables and this narrative, where they appear in bold type.

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## METHODS OF ANALYSIS

A specific stormwater discharge control program can only be designed with reference to site-specific conditions. The selection of particular practices depends on a wide array of conditions. Just a few examples are the site topography, soils, and other physical characteristics; the land use and activities to take place on the site; its proximity to natural receiving waters and the beneficial uses and relative sensitivity of those waters; and the service by public drainage systems. Nevertheless, some elements of a good program are common among sites, and others can be selected with a broad analysis that recognizes the general characteristics of a region. Such a program can identify a suite of practices that are expected to be generally applicable in the region, or at least appropriate options for some sites, depending on their own specific characteristics. This type of analysis is the basis for the program recommended for municipalities in the Los Angeles region.

Five somewhat independent bases were used to devise the recommended program. Most fundamental was the stated requirements of RWQCB Order No. 90-079 and the second-year review. The remaining bases were utilized to outline the RWQCB requirements in more specific programmatic terms according to the standard of maximum practicable control of water pollutants.

The second basis was a systematic practice selection using the screening procedure in the California Storm Water Best Management Practice Handbooks (Camp Dresser and McKee et al. 1993). In this procedure alternative practices are scored according to several factors: ability to meet regulatory requirements, practice effectiveness, public acceptance, ability to be implemented, institutional constraints, and cost. The total scores provide guidance for adoption. This exercise was performed in a systematic fashion, although on a quite general regional scale.

The third basis was Volume IV of the Assessment of Storm Drain Sources of Contaminants to Santa Monica Bay (Stenstrom and Strecker 1993). This document specifies practices for one of the major drainage basins in the region in categories of "mandatory," "recommended," and "optional." It was inspected for the degree of agreement with the handbook screening procedure. There was good general agreement between the highly ranking practices in the screening exercise and the mandatory practices of Stenstrom and Strecker, as well as between the intermediate ranking and recommended practices. One source or the other occasionally brought out some practice that was given less emphasis by the other. In particular, the provisions of Stenstrom and Strecker emphasized legal and programmatic actions that local governments should take to establish the overall program on a firm foundation.

The fourth basis was the BMP selection procedure in the Stormwater Management Manual for the Puget Sound Basin (Washington Department of Ecology 1992). This procedure is very thorough but requires site-based information to apply fully. Therefore, it was consulted mainly for its general ratings of the appropriateness of practices for different objectives.

The final basis was the experience and judgment of the author accumulated over more than 28 years of professional experience, 18 in stormwater management. In addition to being employed in the screening exercise, this background was used mainly to resolve differences among the other sources and consolidate their findings in a unified recommended program.

In addition to these sources, a number of submissions to the RWQCB by the principal permittee and co-permittees were consulted to get an understanding of the context in which the jurisdictions are operating. These documents provided a picture of the approximate level of development of a number of the programs in the region and the range of circumstances under which the municipalities are operating.

Naturally, the actual results realized from the application of any practice depend on the quality of the selection process, design, installation, and operation, which can vary widely. The selections for the recommended program recognized their ability to be implemented, and thus the potential for achieving a high quality application. Beyond that, application for optimum effectiveness is an implicit assumption.

The recommended program omits measures purely taken to control the quantity of stormwater runoff. Quantity control has meant flood control in the past, but now it is recognized that altered quantity of runoff with development also has serious implications for the habitats of aquatic organisms. Alterations occur in both elevated peak flow rates, which create higher frictional stress on stream beds and banks, and greater total volumes of runoff, which extends that stress over longer time periods. These conditions lead to erosion and sediment transport, which thereby becomes a water quality problem. In addition to physically disrupting habitats, the higher flows and sediments have some directly damaging effects on organisms. Therefore, a comprehensive stormwater management program would give requisite attention to water quantity as well as water quality.

Quantity considerations were left aside, however, for two reasons. One, NPDES authority has not generally been interpreted to apply directly to quantity problems. A recent U. S. Supreme Court decision held, however, that quantity considerations are integral with water quality under the Clean Water Act, although it is not clear yet how the decision will affect the stormwater NPDES program. The second reason is that stream and freshwater wetland habitats, which are most affected by quantity problems, are not prominent in the watershed in question. In contrast, this issue is very prominent in stormwater management in the Pacific Northwest, which has a profusion of these environments and associated highly valued salmonid fish habitat.

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## RUNOFF POLLUTANT CONTROL PROGRAM RECOMMENDATIONS

### LEGAL AUTHORITY

The co-permittees were asked to document that they possessed adequate legal authority to operate a stormwater program (Task 2.1.10) and to acquire specific powers to regulate illicit discharges and illegal disposal (Task 3.3). Evidence provided by some of the municipalities subject to the permit left some question as to whether their existing city codes were sufficient for satisfying the intentions of the NPDES permit. In some cases, the cities identified existing ordinances that may have been enacted for goals that differ from those of the NPDES program and may fail to support a coherent, integrated approach to the problem. Much as the cities have adopted laws concerning earthquake building codes and proper garbage disposal, they should devote effort to adopting ordinances (A) with a specific focus on urban runoff management. Although some of the cities' staffs may lack the expertise to develop stormwater laws independently, they should commit to codifying such ordinances based on a model developed in Los Angeles County, or elsewhere. These ordinances must clarify enforcement jurisdiction, particularly for illegal discharges and illicit connections, identify applicable state and federal laws, and define who has responsibility for enforcement of various provisions. For example, some of the cities that contain county-owned storm drains or have a contract with the county for industrial waste services should state which party is responsible for illegal discharges in various portions of the storm drain system.

Municipal storm water ordinances could be structured most easily on the basis of Order No. 90-079. A section on general nonpoint runoff from residential, industrial, and commercial sources (A1) should state the goals of the stormwater management program, including the particular city council's findings on existing problems and needs. The objectives of eliminating illegal discharges and illicit connections and controlling construction site runoff should be stated in this section, but explained in detail elsewhere, because they require somewhat different actions than general nonpoint pollutant control. The ordinance should state any obligations the city has to enforce related state and federal laws and clarify enforcement jurisdictions. The city should require the compliance of its own operations with the ordinance and provide for the reporting of the results of the stormwater program in public documents. The ordinance should also state the requirements for General Industrial Stormwater Permits (GISPs) and General Construction Stormwater Permits (GCSPs) from the state and for Storm Water Pollution Prevention Plans at industrial sites. Some form of water quality standards needs to be included, whether they be a total prohibition on certain kinds of discharges, or are based on requirements imposed by superior jurisdictions or on the best available scientific information. Description of some of the BMPs that may be required should be included, with a clause allowing the city to order other practices as needed to attain water quality standards.

Illegal discharges and illicit connections (A2) should be addressed in a specific section of the stormwater ordinance that includes a description of legal sanctions and fines that the city may impose. The co-permittees should prohibit the installation of illegal connections to storm drains in new construction and require removal of such connections in existing and redeveloped properties.

There needs to be some method of determining responsibility for illegal connections, based on whether the connection was installed by or known to the property owner. The division of responsibility for enforcement against illegal discharge and illicit connections between Los Angeles County and the individual cities needs to be defined where storm drains are not under single ownership and a contractual relationship exists. The ordinance should commit the city to an inspection program that will actively search for and enforce against illegal discharges and illicit connections.

Construction runoff control (A3) could be dealt with legally by incorporating many of the construction BMPs from the California Storm Water Best Management Practices Handbooks. The law should state the requirement for NPDES permits for sites larger than five acres and for Storm Water Pollution Prevention Plans. The ordinance should give the city the ability to regulate the length of time that soil can be bare and to impose a system for prohibiting at certain times, especially in sensitive cases. Fines and sanctions for ordinance violations and the means for educating contractors on runoff regulations should be enumerated, as well. A clause should be included in the ordinance that makes it applicable to both new development and redevelopment. Authority to carry out inspections of construction sites should be elaborated.

One method of gradually achieving more effective resource protection in an already highly developed watershed is to impose all the requirements pertaining to new construction to any site with existing development when it is redeveloped. This measure has the added benefit of making the program more fair over time in its treatment of old and new development. The authority to apply such a requirement should be established by ordinance (A4). Elsewhere, the authority has been assumed whenever an expansion or material improvement of an existing development has occurred.

## **WATER QUALITY MONITORING**

The basis for any successful program to control nonpoint pollutants is an understanding of existing water quality and watershed conditions (B). Few of the co-permittees have performed detailed water quality monitoring (B1a), and county-wide research has been performed at only a relatively small number of sites. Cataloging of watershed characteristics (B1b) has also apparently not been carried out by many of the municipalities. As a result, the cities have frequently chosen to initiate BMPs, particularly the compulsory baseline BMPs, without making an adequate assessment of their site-specific water quality problems, including important pollutants and their sources. Although broad, basin-wide measures are likely to be somewhat helpful, there are clear variations in the geographical characteristics of the cities that should be considered to determine the optimal selection of management practices

One of the difficulties in obtaining needed baseline data is a lack of funding for water quality analyses and geographic information system equipment. However, much information can be gathered without the aid of sophisticated equipment. Each city is required to work on acquiring data on qualitative watershed characteristics (Task 2.1.3) (B1b), including land uses, factors exacerbating pollution, industrial facilities, soils, and other relevant features. Estimation of

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impervious fractions for each land use (Task 2.1.4), determined either by using published averages or by actually measuring impervious fractions for each property, are crucial to calculating the potential for pollutant transport. The results of watershed analysis can then be used to guide selection of existing water quality data from other locations with similar characteristics (B1c). The co-permittees should be able to employ data being gathered through Los Angeles County coordinated sampling. This method of pollutant runoff estimation will aid the municipalities in making educated decisions about which BMPs are likely to work best for them using economically feasible methods.

There has been a clear disparity in the expertise of storm drain utility personnel among the various municipalities. The largest utilities appear to be staffed with individuals well versed in the urban runoff field, but the smaller cities may lack the resources to hire an employee devoted solely to this problem. Either these smaller co-permittees should make an effort to acquire an employee qualified in the urban runoff field, or they should seek greater cooperation with County staff on a contractual or informal basis (B1d). In many instances, program inconsistencies among the various jurisdictions could be redressed by seeking greater cooperation.

A fundamental permit task is to identify and eliminate illegal discharges and illicit connections to the storm drains (B2). One useful method for pursuing this goal is to encourage public reporting (B2a), as the RWQCB has suggested, which can provide both useful information to ordinance enforcement personnel and promote public education. However, city staff will also need to perform regular surveillance of the storm drain system (B2b) for unusual or contaminated flows. These observations could be made in catch basins, drain outfalls, or storm channels. If possible, water sampling (B2c) in locations where problems are believed to be likely could aid greatly in identifying the magnitude of the problems and their possible sources.

## **GENERAL URBAN RUNOFF POLLUTANT CONTROL**

### **Urban Runoff Program Development**

Prerequisite to urban runoff pollutant control (C) are certain program development and implementation steps (C1). First, municipalities should engage in comprehensive stormwater management planning activities (C1a). This planning is a natural outgrowth of the data-gathering, mapping, and problem-identification steps specified under element B1 above. Planning is the means for developing strategies to attack problems through the application of the practices that will be discussed below. A second programmatic element is to set up a permit application review program (C1b), under which applicants' stormwater pollution prevention plans and other submittals can be evaluated and approved or disapproved. A third essential element is an inspection and enforcement program (C1c). Its purpose is follow up to ensure that permit conditions are met. The final programmatic element is an operation and maintenance program (C1d). This program applies mainly to drains and treatment controls in long-term service, which require upkeep to retain effectiveness.

General urban runoff control may be accomplished through the use of source (C2) or treatment (C3) controls.

### Source Controls

Source control of pollutants (C2) is preferred to treatment of contaminated water because it is more effective and results in lower costs, both fiscally and environmentally. In addition, the highly developed character of much of the Los Angeles region precludes the retrofitting of land-intensive treatment controls and requires the municipalities to concentrate on reducing pollutant inputs to the existing storm drain system. For general runoff pollutant control from residential, commercial, and industrial land uses, public education (C2a) should receive a strong emphasis. Educational media should be chosen that have the potential of reaching the widest possible audience. Some of the proposals made by co-permittees rely too much on either chance exposure to the public or on the desire of individuals to seek information from specialized sources. Articles and public announcements in the newspaper and cable television programs fall into this category, because their success depends on the individual picking up a newspaper or tuning into a particular station at a certain time. The catch basin stencils are likely to be a more effective method because they will be seen and, hopefully, understood by a large portion of the population on a daily basis. Related methods, which have been used in the Seattle area, are signs that make the public aware when they are entering the watershed of a valued natural water body and signs at bridges that urge the protection of stream quality. Other potentially effective techniques include television commercials, mailings inserted in utility bills, brochures, billboards, and advertising on public transportation.

Contacts between city enforcement personnel and private citizens and commercial, industrial, and construction workers should also be considered an important component of public education. This education may be performed using runoff control BMP checklists, information sheets, workshops, and if necessary, by the imposition of sanctions and fines. Other worthwhile efforts could include providing public speakers for community groups and schools. The future behavior of children may be positively affected by instruction at an early age, and they may also communicate what they learned to their parents, affecting adult behavior to some degree.

In combination with educational efforts to discourage the improper disposal of motor oil and other hazardous materials, the municipalities must maintain their collection programs (C2b). Petroleum and other organic compounds are among the significant pollutants in the receiving waters to be protected by the permit, and it is clearly worthwhile to try to keep them from entering runoff. In addition, disposal of these substances to sanitary sewers can negatively affect sewage treatment plant operations by killing bacteria.

Storm drain facility maintenance (C2c) can be effective in reducing polluted runoff when regularly performed. As catch basins become increasingly full, their ability to retain solids and their associated contaminants diminishes. Rather than establishing a fixed cleaning schedule for an entire city, catch basins may fill at different rates due to individual catchment characteristics, such as land use, exposure of soil, and amount of trees. The goal of removing material when they are

less than 50% full will increase the effectiveness of this BMP. The maintenance of other stormwater facilities, including treatment controls, should be required by the RWQCB to maintain their functioning and effectiveness in reducing pollution. A related issue, discussed by several of the co-permittees, is the upkeep and renovation of sanitary sewers (C2j) to prevent blockages that may cause sewage to flow to storm drains. Because bacterial contamination is of concern in some regional surface waters like Santa Monica Bay, each municipality should make a careful examination of its sewer systems to identify any combined sewers or other cross connections that could reduce the proper functioning of either sanitary or storm sewers. Excessive loading of combined sewers during rain storms can lead to combined sewer overflows to natural water bodies.

Illegal discharges and illicit connections (B2 and C2d) may be related in their effects on water quality, but different measures are needed to eliminate them. Illegal discharges may be related to any land use and are likely to originate on the surface. Illicit connections are more likely to be a problem for waste water-producing commercial and industrial operations and are frequently hidden underground. Public education along with enforcement should be the primary approach to illegal discharges. Illicit connections may result in chronic flows, the sources of which may be difficult to identify. While sophisticated detection methods and regular water quality monitoring may not be feasible (B2c), regular surveillance and detailed record keeping should aid greatly in detecting illicit connections. City inspections of commercial and industrial facilities (C2k and D2h) that may be potential sources of contamination is another important means of detection. Prevention of illicit or inadvertent connections should be a major goal at development or redevelopment sites (C2d).

Water conservation (C2e), while a generally beneficial activity and a required baseline BMP, addresses the quantity of water consumed rather than the uses to which it is put and its ultimate fate. Outdoor water use can contribute to dry weather flows, which frequently have pollutant concentrations much higher than storm flows, but lower overall loadings. Perhaps an emphasis should be placed on the limitation of water-consuming activities in areas where outflow could reach storm sewers, particularly car, sidewalk, and driveway washing, to meet both water conservation and quality goals.

Measures related to control of the flow of various solid materials to storm drains include: illegal dumping prevention (C2f), litter control (C2g), grounds maintenance control (C2h), and control of animal waste, yard waste, general debris, and refuse (C2i). Pollutant constituents most closely associated with solid waste include bacterial contamination, total suspended solids, biochemical oxygen demand, nutrients, and visual blight. In general, efforts to control these materials should emphasize those that are most likely to result in elevated dissolved pollutant concentrations, which are most damaging to a broad range of beneficial coastal uses. The RWQCB included litter control and recycling in its 13 baseline BMPs, but such large forms of solid waste are probably not among the greatest problems facing the bay. Efforts should be made to reduce the flow of yard wastes to the storm drains, including soil, fallen leaves, plant material, and lawn clippings, and to prevent the entry of animal wastes into storm drains.



**Treatment Controls**

As stated above, treatment controls (C3) are likely to have a smaller role in mitigating runoff impacts in a highly developed region than source controls. For general urban runoff, they should be considered for use, where feasible, for mitigating the impacts of pollution not prevented by source controls.

Of the available treatment techniques, infiltration (C3a), media filtration(C3b), oil/water separators (C3c), and water quality inlets and other improved catch basin designs (C3d) are likely to be the most practical in the basin due to their limited space needs. Devices such as biofilters (C3e) and wet ponds (C3f) should definitely be considered for larger new developments and redevelopment.

On-site infiltration is preferable where soils, slopes, and water tables permit, because it precludes any surface runoff that could affect aquatic resources. While these benefits are very significant if they can be achieved, considerable care must be taken to site infiltration facilities only in places where hydrological conditions have been demonstrated to be suitable for the intended service. Furthermore, these facilities must be guarded against sediment loadings that could clog them. Residential areas may be the most feasible for infiltration because of their relatively higher pervious area, in which each house is surrounded by vegetation that can help promote infiltration and protect soil. In such areas, direct roof-to-storm drain connections should be limited, with preference for small-scale infiltration trenches and wells. Driveways should also be drained away from streets, if possible. For other land uses, infiltration may be most appropriate for parking lots, using perforated brick and infiltration trenches.

It appears that many, if not most, of the catch basins currently used in Los Angeles area storm drain systems have little sump capacity to capture and store larger solids. Replacing this type of catch basin with a "trapping catch basin," which has a sump below its discharge point, is a definite retrofit possibility in existing developments. The trapping catch basin should be made standard in new construction. It appears that a well maintained trapping catch basin can reduce total solids in runoff by approximately 70 percent and the suspended fraction that is most environmentally damaging by perhaps 20-25 percent. Jurisdictions should evaluate their systems to determine where catch basin replacement would be most cost-effective and then set up a schedule to make the replacements over time.

A relatively new device that has been demonstrating promise around the country are sand filters (C3b), which can be installed, for example, below grade along the periphery of parking lots and require little space. At a Seattle industrial site, they have shown initial effectiveness in substantially reducing suspended solids, oil and grease, and total petroleum hydrocarbons. Results elsewhere have shown promise for other types of pollutants, as well.

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## INDUSTRIAL AND CONSTRUCTION SITE RUNOFF CONTROL

Industrial (D) and construction runoff pollutant controls (E) are adequately addressed by the California Storm Water Quality Best Management Practices Handbooks. Education and enforcement for these activities should be directed towards promoting these BMPs. The legal authority to issue permits for each site where these activities take place distinguishes these activities from general urban land use, and gives the co-permittees a relatively high degree of control over discharges from these sites. In both cases the preparation of stormwater pollution prevention plans (D1 and E1) is mandated by NPDES regulations. In both instances, also, compliance can be pursued through source controls (D2 and E2), treatment controls (D3 and E3), or both. Direct communication of information by city workers (D2a and E2a) is likely to be crucial for industrial, commercial, and construction operations, because of the impracticality of affecting these activities through the mass media. Site inspections are an important element of such an effort (D2h and E2p). Pre-construction meetings present an excellent opportunity to highlight the provisions of erosion and sediment control plans, performance expectations, and the inspection program. The municipalities should be active in promoting source controls through such educational methods as checklists, information forms, meetings with plant and construction site workers, and training. They should also pursue enforcement to ensure runoff source controls through adoption of SWPPPs that include spill containment and clean-up procedures (D2b and E2b), proper materials (D2c and E2c) and fuel storage (D2d and E2d), correct equipment washing (D2e and E2e) and maintenance operations (D2f and E2f), and proper waste handling and disposal (D2g and E2g). Included among waste handling practices on construction sites should be concrete waste management.

Other important source controls, specifically relevant to construction, are construction scheduling to minimize the exposure of soil during the rainy season (E2h) and preservation of natural vegetation by setting clearing limits (E2i). In sensitive locations with highly erosive soils, steep slopes, or close proximity to receiving waters, no clearing should be permitted during the rainy season. Other construction site runoff controls include runoff conveyance and retention devices (E2j), temporary and permanent vegetation establishment (E2k), inlet protection (E2l), construction entrance stabilization (E2m), construction road stabilization (E2n), and outlet protection (E2o). Industrial and construction runoff control should emphasize source control, but treatment controls should also be mandated where appropriate. In order to meet water quality standards required by an NPDES industrial permit where highly oily and contaminated runoff is anticipated, certain industrial sites may need to deploy such treatment controls (D3) as oil/water separators, media filtration, and water quality inlets in both existing and new facilities. Treatment controls for construction include filter fabric fences (E3a), sediment basins and traps (E3b), and the installation of permanent treatment controls prior to construction (E3c).

## COMPARISON OF THE RECOMMENDED PROGRAM TO RWQCB REQUIREMENTS

The recommended program is more specific than the requirements issued in Order No. 90-079. However, the effect of the Order is to require the specification of practices in each of the groups and categories in the recommended program, namely:

### Jurisdictional (Order requirement 3.3)

General Urban (3.1.2)  
Source Control  
Treatment

Industrial (3.1.2)  
Source Control  
Treatment

Construction Activity (2.1.6)  
Erosion and Sediment Control  
Preventive  
Treatment  
Other Construction Site Problem Areas

Unlike the recommended program, the Order does not separate general urban and industrial groups, although it refers to land uses in both, nor does it separate erosion and sediment control and other construction site problem areas. These separations are made in the recommended program for clarity because of the fundamental differences in the practices employed. The only instance in which the Order gets specific is in the control of illicit connections and dumping (3.1.3), which falls under the Source Control category in the General Urban group in the recommended program.

Table 2 relates each element of the recommended program to a task in the original RWQCB Order or a BBMP in the second-year review. Also indicated is whether a task is a documentation (D), planning (P), or evidence (E) requirement. A documentation task is a requirement to furnish information on activities existing at the time of the permit's issuance. Planning tasks require the preparation of detailed plans with schedules for implementation of ordinances, urban runoff BMPs, illegal discharge and illicit connection elimination, and construction site runoff controls. Evidence tasks constitute proof of progress on implementing activities proposed under the planning tasks. It should be noted that task numbers sometimes appear in more than one place on Table 2 (e. g., 2.1.10, 3.1.1). In these instances the task defined by the RWQCB incorporated two or more distinct elements. These distinctions could arise because the task involves more than one classification (D, P, or E), or because it represents more than one element in the recommended program, or because the description clearly implies separate subtasks.

It bears reemphasis that the principal bases for arriving at the model program were the California Storm Water Best Management Practices Handbooks and the recommendations of Stenstrom and Strecker (1993), behind both of which is very extensive analysis pertinent to the case in point. The issuance of the Handbooks is a landmark event, in that it provides all the jurisdictions in the state with the tools to implement a program equivalent to the model offered here.

#### REFERENCES

Camp Dresser and McKee, Larry Walker Associate, Uribe and Associates, and Resource Planning Associates. 1993. California Stormwater Management Best Management Practices Handbooks: Municipal; Industrial/Commercial; Construction Activity.

Stenstrom, M. K. and E. W. Strecker. 1993. Assessment of Storm Drain Sources of Contaminants to Santa Monica Bay; Vol. 4, Selection of Best Management Practices for Control of Stormwater Pollution to Santa Monica Bay. University of California, Los Angeles, Department of Civil and Environmental Engineering and Woodward-Clyde Consultants, Portland, OR.

Washington Department of Ecology. 1992. Stormwater Management Manual for the Puget sound Basin, Washington Department of Ecology, Olympia, WA.

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**Table 1. Recommended Program for Urban Runoff Pollutant Control for Los Angeles County and Co-Permittees Subject to Stormwater NPDES Permit**

**A. Legal Authority**

- A1. General Urban Runoff Ordinance Providing Regulatory Authority for the Overall Program**
- A2. Section or Ordinance to Enforce Against Illegal Disposal and Illicit Connections**
- A3. Section or Ordinance Requiring the Control of Construction Site Runoff with Enforcement Provisions**
- A4. Section or Ordinance Setting Requirements for Upgrading Stormwater Management at Redeveloping Sites**

**B. Water Quality Monitoring**

**B1. General Urban Runoff**

- a. Regular water quality monitoring of storm drains to guide the program and evaluate its results, if financially feasible**
- b. Identification and mapping of watershed characteristics to calculate potential runoff volumes, pollutant sources, and exacerbating factors**
- c. Extrapolation of water quality and quantity data from areas with similar watershed characteristics to estimate runoff pollutant quantities and to select BMPs**
- d. Acquisition of personnel qualified in the urban runoff field, or greater cooperation with co-permittees on NPDES program**

**B2. Illegal Discharge and Illicit Connections**

- a. Promoting reporting by the public of illegal discharges**
- b. Surveillance of the storm drain system to detect unusual or illegal discharges and to trace their source**
- c. Use of water quality sampling to detect illegal discharges and illicit connections, if financially feasible**

**C. General Urban Runoff Pollutant Controls**

**C1. Urban Runoff Program Development**

- a. Urban runoff management planning**
- b. Permit application review program**
- c. Inspection and enforcement program**
- d. Operation and maintenance program**

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**C2. Source Controls**

- a. Public education and storm drain stenciling
- b. Used oil recycling and hazardous household waste collection
- c. Stormwater management facility maintenance: catch basins, storm drains, and treatment facilities
- d. Illicit connection control: prevention at building and removal
- e. Water conservation
- f. Illegal dumping prevention
- g. Litter control
- h. Grounds maintenance control
- i. Control of animal wastes, yard wastes, general debris, and refuse
- j. Maintenance and reconstruction of sanitary and combined sewer systems to prevent flows of untreated sewage to the storm drains
- k. Inspections of commercial facilities

**C3. Treatment Controls (selected as appropriate and necessary to meet program objectives based on site-specific analyses; refer to supporting materials)**

- a. Infiltration
- b. Media filtration (sand filters and similar devices)
- c. Oil/water separators
- d. Water quality inlets
- e. Biofiltration (vegetated swales)
- f. Wet or extended-detention dry ponds
- g. Constructed wetlands (hydrology permitting)
- h. Multiple systems

**D. Industrial Runoff Control**

**D1. Development, Review, and Enforcement of Stormwater Pollution Prevention Plans (SWPPPs)**

**D2. Source Controls**

- a. Employee education and training (using checklists, information sheets, and meetings with city stormwater personnel)
- b. Spill containment and clean-up procedures
- c. Outdoor processing and material handling and storage control
- d. Vehicle fueling control
- e. Equipment cleaning control
- f. Outdoor equipment maintenance
- g. Waste handling and disposal control
- h. Inspections of industrial facilities

**D3. Treatment Controls (same as general urban treatment controls)**

**E. Construction Site Runoff Control**

**E1. Development, Review, and Enforcement of Storm Water Pollution Prevention Plans for Construction Sites (also termed Erosion and Sediment Control Plans-ESCs)**

**E2. Source Controls (as specified in ESC plan based on site-specific analyses)**

- a. Employee education and training (using checklists, information sheets, and meetings with city stormwater personnel)
- b. Spill containment and clean-up procedures
- c. Outdoor material handling and storage control
- d. Vehicle fueling control
- e. Equipment cleaning control
- f. Outdoor equipment maintenance
- g. Concrete and general waste handling and disposal control
- h. Construction scheduling
- i. Preserving natural vegetation/clearing limits
- j. Runoff controls (temporary drains, swales, and dikes, slope terracing, and subsurface drains)
- k. Temporary and permanent vegetation establishment (seeding, mulching, mats and blankets, and sodding)
- l. Inlet protection
- m. Construction entrance stabilization
- n. Construction road stabilization
- o. Outlet protection
- p. Inspections of construction sites

**E3. Treatment Controls (as specified in ESC plan based on site-specific analyses)**

- a. Filter fabric fences and other barriers
- b. Sediment basins and traps
- c. Pre-installation of permanent treatment control

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**Table 2. Relation of the Recommended Program to Requirements of the Regional Water Quality Control Board's (RWQCB) Permit**

Note: Tasks are from RWQCB Order No. 90-079. D signifies documentation tasks, P signifies planning tasks, and E signifies evidence tasks. BBMP means baseline best management practice from the RWQCB second-year review of June 17, 1993.

Task/Baseline BMP Number	Compliance Deadline	PROGRAM ELEMENT
		<b>A. Legal Authority</b>
Task 2.1.10 (D)	July 1, 91	<b>A1. General Urban Runoff Ordinance Providing Regulatory Authority for the Overall Program</b>
Task 3.1.2 (P), BBMP 3 (P)	July 1, 92; July 1, 93	
BBMP 4 (P)	July 1, 93	
Task 2.1.5 (D)	July 1, 91	<b>A2. Section or Ordinance to Enforce Against Illegal Disposal and Illicit Connections</b>
Task 2.1.10 (P)	July 1, 91	
Task 3.1.3 (P)	July 1, 92	
Task 3.3 (E)	July 1, 92	
Task 3.1.4 (P), BBMP 3 (P)	July 1, 92; July 1, 93	<b>A3. Section or Ordinance Requiring the Control of Construction Site Runoff with Enforcement Provisions</b>
Tasks 3.1.4 (P), BBMP 3 (P)	July 1, 92, July 1, 93	<b>A4. Section or Ordinance Setting Requirements for Upgrading Stormwater Management at Redeveloping Sites</b>
		<b>B. Water Quality Monitoring</b>
		<b>B1. General Urban Runoff</b>
Tasks 2.1.1, 2.1.2 (D)	July 1, 91	<b>a. Regular water quality monitoring of storm drains to guide the program and evaluate its results, if financially feasible</b>
Task 2.1.9 (P)	July 1, 91	
Task 3.1.1 (P)	July 1, 92	
Task 2.1.3 (E)	July 1, 91	<b>b. Identification and mapping of watershed characteristics to calculate potential runoff volumes, pollutant sources, and exacerbating factors</b>
Task 2.1.4 (D)	July 1, 91	
Task 3.1.2 (P)	July 1, 92	
Task 3.1.2 (P)	July 1, 92	<b>c. Extrapolation of water quality and quantity data from areas with similar watershed characteristics to estimate runoff pollutant quantities and to select BMPs</b>



Task 4.1.2 (E)	July 1, 93	d. Acquisition of personnel qualified in the urban runoff field or greater cooperation with co-permittees on NPDES program
Task 2.1.5 (D)	July 1, 91	<b>B2. Illegal Discharge and Illicit Connections</b>
Task 3.1.3 (P)	July 1, 92	
Task 4.1.2 (E)	July 1, 93	
BBMP 2 (P), Task 4.1.2 (E)	July 1, 93	a. Promoting reporting by the public of illegal discharges
Task 3.1.2 (P)	July 1, 92	b. Surveillance of the storm drain system to detect unusual or illegal discharges and to trace their source
Task 3.1.3 (P)	July 1, 92	
Task 4.1.2 (E)	July 1, 93	
Task 3.1.3 (P)	July 1, 92	c. Use of water quality sampling to detect illegal discharges and illicit connections, if financially feasible
Task 4.1.2 (E)	July 1, 93	
Task 2.1.7 (D)	July 1, 91	<b>C. General Urban Runoff Pollutant Controls</b>
Task 2.1.8 (P)	July 1, 91	
Task 3.2 (E)	July 1, 92	
		<b>C1. Urban Runoff Program Development</b>
Tasks 3.1.2, 3.1.4 (P)	July 1, 92	a. Urban runoff management planning
Task 2.1.6 (D)	July 1, 91	b. Permit application review program
Task 3.1.4 (P)	July 1, 92	
BBMP 13 (P)	July 1, 93	
Task 4.1.3 (E)	July 1, 93	
Task 2.1.5 (D)	July 1, 91	c. Inspection and enforcement program
Task 2.1.6 (D)	July 1, 91	
Task 3.1.2 (P)	July 1, 92	
Task 3.1.3 (P)	July 1, 92	
Task 3.1.4 (P)	July 1, 92	
BBMP 9 (P), Task 4.1.1 (E)	July 1, 93	
Task 4.1.2 (E)	July 1, 93	
Task 4.1.3 (E)	July 1, 93	
Task 2.1.7 (D)	July 1, 91	d. Operation and maintenance program
Task 3.1.2 (P)	July 1, 92	
BBMP 4 (P), Task 4.1.1 (E)	July 1, 93	
BBMP 5 (P), Task 4.1.1 (E)	July 1, 93	
Task 4.1.1 (E)	July 1, 93	<b>C2. Source Controls</b>

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BBMP 4, 8 (P), Task 4.1.1 (E)	July 1, 93	
BBMP 10 (P), Task 4.1.1 (E)	July 1, 93	
Task 3.1.3 (P)	July 1, 92	j. Inspections of commercial facilities
BBMP 9 (P), Task 4.1.1 (E)	July 1, 93	
Task 4.1.2 (E)	July 1, 93	
Task 4.1.1 (E)	July 1, 93	C3. Treatment Controls
Task 3.1.2 (P)	July 1, 92	a. Infiltration
Task 3.1.2 (P)	July 1, 92	b. Media filtration (sand filters and similar devices)
Task 3.1.2 (P)	July 1, 92	c. Oil/water separators
Task 3.1.2 (P)	July 1, 92	d. Water quality inlets
Task 3.1.2 (P)	July 1, 92	e. Biofiltration (vegetated swales)
Task 3.1.2 (P)	July 1, 92	f. Wet ponds
Task 3.1.2 (P)	July 1, 92	g. Constructed wetlands (hydrology permitting)
Task 3.1.2 (P)	July 1, 92	h. Multiple systems
Task 2.1.7 (D)	July 1, 91	D. Industrial Runoff Control
Task 2.1.8 (P)	July 1, 91	
Task 3.1.2 (P)	July 1, 92	
Task 3.2 (E)	July 1, 92	
Task 4.1.1 (E)	July 1, 93	
Task 3.1.2 (P)	July 1, 92	D1. Development, Review, and Enforcement of Stormwater Pollution Prevention Plans (SWPPPs)
Task 4.1.1 (E)	July 1, 93	
		D2. Source Controls
Task 3.1.2 (P)	July 1, 92	a. Employee education and training (using checklists, information sheets, and meetings with city stormwater personnel)
Task 4.1.1 (E)	July 1, 93	
Task 3.1.3 (P)	July 1, 92	b. Spill containment and clean-up procedures
BBMP 4 (P), Task 4.1.1 (E)	July 1, 93	
Task 4.1.1 (E)	July 1, 93	
Task 3.1.2 (P)	July 1, 92	c. Outdoor material handling and storage control
Task 4.1.1 (E)	July 1, 93	
Task 4.1.1 (E)	July 1, 93	d. Vehicle fueling control
Task 3.1.2 (P)	July 1, 92	e. Equipment cleaning control
Task 4.1.1 (E)	July 1, 93	
Task 3.1.2 (P)	July 1, 92	f. Outdoor equipment maintenance
Task 4.1.1 (E)	July 1, 93	
Task 3.1.2 (P)	July 1, 92	g. Waste handling and disposal control
Task 4.1.1 (E)	July 1, 93	

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Task 3.1.4 (P)	July 1, 92	a. Filter fabric fences and other barriers
Task 4.1.3 (E)	July 1, 93	
Task 3.1.4 (P)	July 1, 92	b. Sediment basins and traps
Task 3.1.4 (P)	July 1, 92	c. Pre-installation of permanent treatment controls

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Dr. Robert P. Ghirelli  
December 28, 1994  
Page 3

**Phase II (Year Three Activities): Upper Los Angeles River and Upper San Gabriel River Drainage Basins**

The third-year tasks for Phase II Co-Permittees, as required by the Permit, have been initiated. The tasks include implementing Early Action BMPs and Additional BMPs, detecting and eliminating illegal discharges and illicit disposal practices, and controlling pollutants in surface runoff from construction sites.

As of the end of this quarter, all but 11 Co-Permittees have completed all first-year Permit activities (see Attachment B). For the second-year activities, 17 Co-Permittees completed all their tasks this quarter. Other Co-Permittees have submitted some of the required submittals. Enclosed are the status reports for the first- and second-year activities (Attachment B). A "Permittee Meeting Attendance" chart is also enclosed for your records (Attachment C).

**Phase III (Year Two Activities): Lower Los Angeles River, Lower San Gabriel River, and Santa Clara River Drainage Basins**

Phase III Co-Permittees are underway with the following second-year activities: additional storm drain mapping and data collection, development of additional BMPs, implementation of Early Action BMPs, and completion of the development of legal authority. Five Co-Permittees have not completed all their first-year tasks. The status report on first- and second-year activities is enclosed (Attachment D) and the "Monthly Permittee Attendance" chart is also enclosed (Attachment E).

**Upcoming Activities Under the New Permit**

Next quarter will begin the transition from the current three-Phase program into the new watershed-based stormwater management program, as proposed in the Report of Waste Discharge submittal. A majority of the Co-Permittees has been noted to begin such a transition. This transition will reorganize the area under the Permit into six separate watersheds, each developing its own stormwater management plan. In order to facilitate such an adjustment there will be routine meetings for each of the watersheds. Each meeting will be chaired by Los Angeles County and attended by the Co-Permittees or each respective watershed. We are anticipating that your staff will be attending these meetings to provide direction for the development and implementation of these stormwater management plans.

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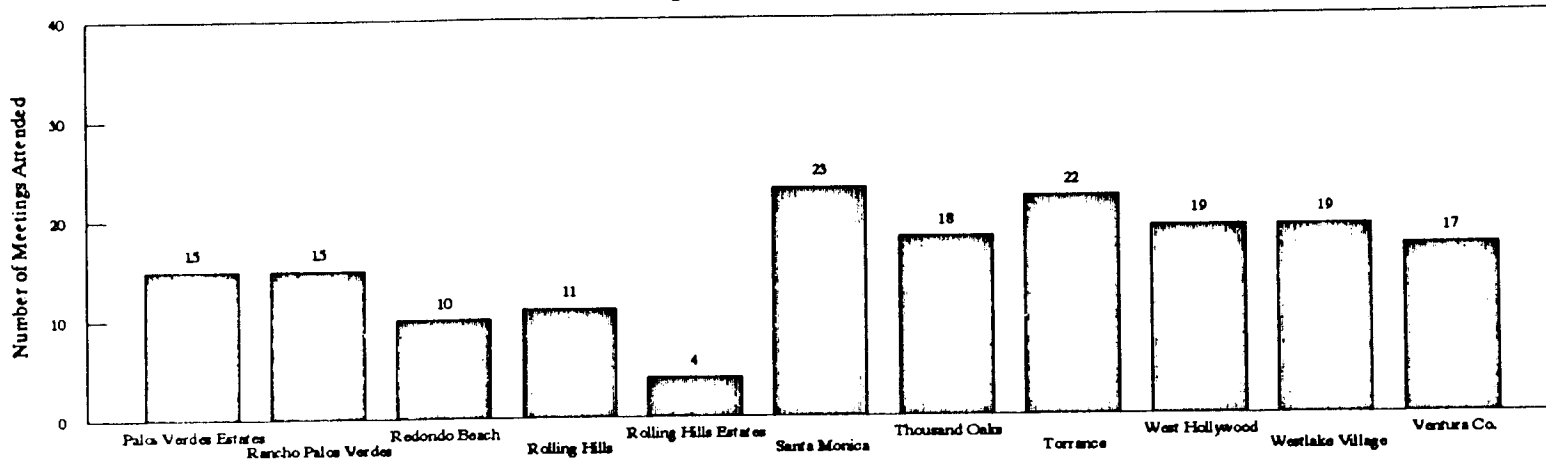
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ATTACHMENT A

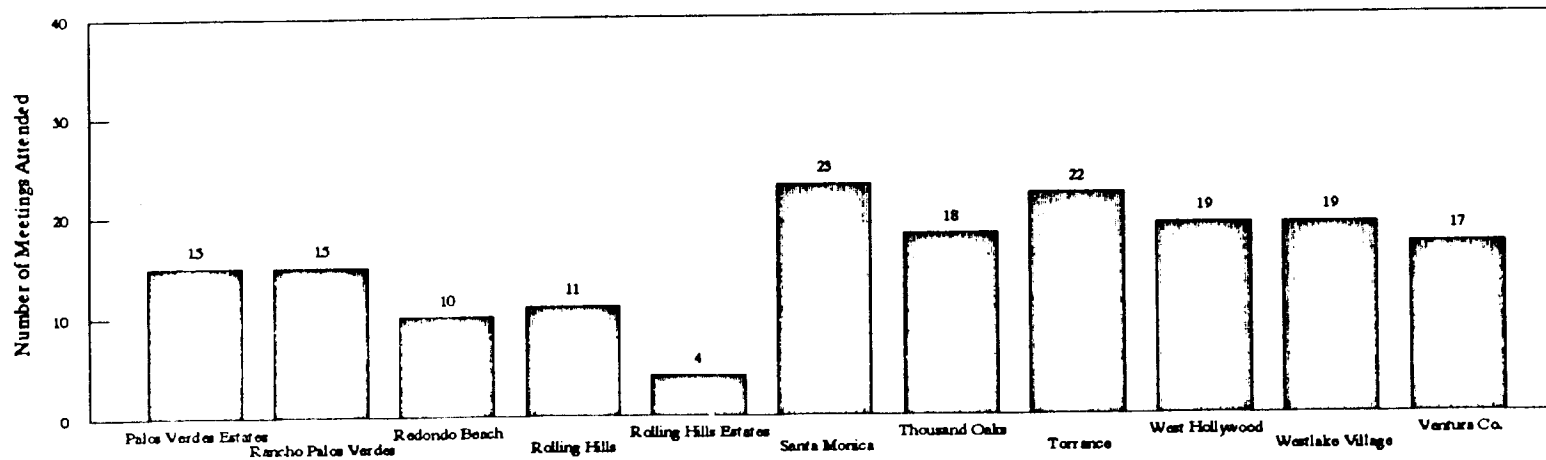
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# Phase I Agencies MONTHLY PERMITTEE MEETING ATTENDANCE

Number of Meetings to Date: 27 (April 21, 1992 to September 20, 1994)



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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES

as of: December 8, 1994

Dead-line	Activities	Athens	Arcata	Azusa	Baldwin Park	Bradbury	Burbank	Calabasas	Caltrans	Claremont	Covina	Diamond Bar	Duarte	El Monte
Sept 30 1992	Submission of Existing	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/08/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92
	Final Data	09/30/92	09/21/92	09/17/92	09/16/92	10/07/92	10/08/92	NA	10/14/92	07/16/92	10/05/92	09/17/92	09/15/92	10/07/92
	Submission of Existing	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/08/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92
	Flow Data	09/30/92	09/21/92	09/17/92	09/16/92	10/07/92	10/08/92	NA	10/14/92	07/16/92	10/05/92	09/17/92	09/15/92	10/07/92
	Submission of Existing	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	12/02/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92
	Water Quality Data	09/30/92	09/21/92	09/17/92	09/16/92	10/07/92	12/02/92	NA	10/14/92	07/16/92	10/05/92	09/17/92	09/15/92	10/07/92
Oct 30 1992	Alignment of	10/30/92	11/02/92	10/29/92	09/27/92	11/01/92	04/07/93	NA	09/24/93	07/14/92	10/29/92	10/29/92	10/29/92	10/29/92
	Storm drain	11/02/92	11/02/92	11/02/92	09/16/92	11/03/92	05/05/93	NA		10/29/92	10/27/92	11/02/92	11/02/92	10/29/92
	Identification of Natural	10/30/92	11/02/92	10/29/92	09/27/92	11/01/92	04/07/93	NA	09/24/93	07/14/92	10/29/92	10/29/92	10/29/92	10/29/92
	Drainage Watercourses	11/02/92	11/02/92	11/02/92	09/16/92	11/03/92	05/05/93	NA		09/15/92	10/27/92	11/02/92	11/02/92	10/29/92
	Identification of Private	10/30/92	11/02/92	10/29/92	09/27/92	11/01/92	04/07/93	NA	09/24/93	07/14/92	10/29/92	10/29/92	11/04/92	10/29/92
	Drainage Systems	12/15/92	11/02/92	11/02/92		11/03/92	05/05/93	NA		09/15/92	10/27/92	11/02/92	11/04/92	10/29/92
	Definition of	10/30/92	11/02/92	10/29/92	09/27/92	11/01/92	04/07/93	NA	09/24/93	10/29/92	10/29/92	10/29/92	11/03/92	10/29/92
	Drainage Boundaries	11/02/92	11/02/92	11/02/92		11/03/92	05/05/93	NA		10/29/92	10/27/92	11/02/92	11/04/92	10/29/92
Nov 30 1992	Determination of Existing	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA	12/01/93	09/02/92	11/30/92	12/01/92	11/17/92	11/30/92
	BMPs for Construction Sites	12/01/92	12/01/92	11/30/92	12/03/92	12/01/92	05/05/94	NA	12/01/93	09/02/92	12/01/92	12/01/92	11/18/92	12/01/92
	Existing BMPs for Illegal	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA	12/01/93	09/02/92	11/30/92	12/01/92	11/17/92	11/30/92
	Discharge & Disposal Practices	12/01/92	12/01/92	11/30/92	12/03/92	12/01/92	05/05/94	NA	12/01/93	09/02/92	12/01/92	12/01/92	11/18/92	12/01/92
	Existing BMPs for Residential,	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA	12/01/93	09/02/92	11/30/92	12/01/92	11/17/92	11/30/92
	Commercial, & Industrial	12/01/92	12/01/92	11/30/92	12/03/92	12/01/92	05/05/94	NA	12/01/93	09/02/92	12/01/92	12/01/92	11/18/92	12/01/92
Feb 1 1993	Identification of Waste	02/01/93	01/28/93	02/03/93	09/27/92	11/02/92	09/04/93	NA	10/14/92	07/14/92	01/29/93	01/19/93	09/17/92	01/25/93
	Disposal Facilities	02/01/93	02/08/93	04/22/93	09/16/92	11/03/92		NA	10/14/92	07/16/92	01/27/93	01/19/93	11/02/92	02/01/93
Mar 1 1993	Identification of Industries	02/17/93	11/02/92	11/30/92	02/17/93	11/09/93	10/04/93	NA	NA	02/08/93	03/04/93	03/29/93	03/11/93	03/22/93
	by SIC Code	02/17/93	03/01/93	11/30/92	02/17/93	11/09/93		NA	NA	02/09/93	03/08/93	03/29/93	03/11/93	03/22/93
Apr 1 1993	Development of Early	03/31/93	04/01/93	04/01/93	02/23/93	04/01/93		NA	09/21/94 **	03/24/93	03/24/93	03/29/93	03/31/93	03/22/93
	Action BMP Plan	04/01/93	04/01/93	04/01/93	03/23/93	04/14/93		NA	09/21/94 **	03/29/93	04/13/93	03/29/93	03/31/93	03/22/93
Apr 19 1993	Submission of	04/22/93	04/22/93	04/22/93	04/12/93	04/29/93	04/26/93	NA	NA	04/20/93	04/19/93	04/15/93	04/22/93	04/14/93
	Signature Block	04/22/93	04/22/93	04/22/93	04/12/93	04/29/93	04/29/93	NA	NA	04/20/93	04/19/93	04/15/93	04/22/93	04/14/93
May 13 1993	Required Legal Authority for Regulation	05/13/93	05/18/93	05/05/93	05/18/93		09/04/93	NA	09/29/94 **	09/01/93	05/11/93	05/11/93	09/18/93	05/04/93
	of Stormwater/Urban Runoff	05/17/93	05/18/93	05/05/93	05/18/93		09/05/93	NA	09/29/94 **	09/01/93	05/11/93	05/11/93	09/18/93	05/04/93
	Stormwater Permit	05/13/93	05/26/93	05/13/93	09/24/93	09/02/93	09/22/93	NA	NA	09/01/93	05/11/93	05/08/93	05/19/93	05/17/93
	Implementation Agreement	05/17/93	05/26/93	05/17/93	09/24/93	09/02/93	09/22/93	NA	NA	09/08/93	05/11/93	05/10/93	09/20/93	05/17/93

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES

as of: December 6, 1994

Dead- lines	Activities	Glendale	Glerdoms	Hidden Hills	Industry	Inwindsate	La Canada Flintbridge	La Habra Heights	La Puente	La Verne	Los Angeles	Monrovia	Montebello	Monterey Park
Sept 30 1992	Submission of Existing Rainfall Data	09/09/92	09/27/92	10/06/92	07/30/92	10/07/92	09/30/92	09/23/92	02/04/93	09/14/92	09/27/91	09/17/92	09/14/92	09/14/92
	Submission of Existing Flow Data	09/09/92	09/27/92	10/06/92	07/30/92	10/07/92	09/30/92	09/23/92	02/04/93	09/14/92	09/08/91	09/17/92	09/14/92	09/14/92
	Submission of Existing Water Quality Data	09/09/92	09/27/92	10/06/92	07/30/92	10/07/92	09/30/92	09/23/92	02/04/93	09/14/92	09/30/92	09/17/92	09/14/92	09/14/92
		09/14/92	09/02/92	10/06/92	08/06/92	10/07/92	09/30/92	09/24/92	02/08/93	09/14/92	10/05/92	09/20/92	09/14/92	09/14/92
Oct 30 1992	Alignment of Stormdrain	09/13/92	11/02/92	11/03/92	10/28/92	12/15/93	11/03/92	10/29/92	02/17/93	11/23/92	10/28/92	10/28/92	10/26/92	11/02/92
	Identification of Natural Drainage Watercourses	09/13/92	11/03/92	11/03/92	11/03/92	12/15/93	11/03/92	11/03/92	03/02/93	11/23/92	10/28/92	10/27/92	10/26/92	11/03/92
	Identification of Private Drainage Systems	09/13/92	11/01/92	11/03/92	11/23/92	12/15/93	12/03/92	10/29/92	02/17/93	11/23/92	10/28/92	10/28/92	11/04/92	11/02/92
	Definition of Drainage Boundaries	09/13/92	11/02/92	11/03/92	10/28/92		11/03/92	10/29/92	02/17/93	11/23/92	10/28/92	10/28/92	10/26/92	11/02/92
		11/03/92	11/03/92	11/03/92	11/03/92		11/03/92	11/03/92	03/02/93	11/23/92	10/28/92	10/27/92	10/27/92	11/02/92
		11/03/92	11/03/92	11/03/92	11/03/92	11/23/92	12/30/93	02/03/93	12/01/92	02/17/93	12/02/92	03/13/90	11/21/92	11/30/92
Nov 30 1992	Determination of Existing BMPs for Construction Sites	12/01/92	12/01/92	12/01/92	11/30/92	12/30/93	02/03/93	12/01/92	03/02/93	12/02/92	10/19/92	11/23/92	12/01/92	12/01/92
	Existing BMPs for Illegal Discharge & Disposal Practices	11/30/92	11/30/92	11/30/92	11/23/92	12/30/93	01/04/93	12/01/92	02/17/93	12/02/92	03/13/90	11/23/92	11/30/92	11/30/92
	Existing BMPs for Residential, Commercial, & Industrial	11/30/92	11/30/92	11/30/92	11/23/92	12/30/93	01/04/93	12/01/92	02/17/93	12/02/92	03/13/90	11/23/92	11/30/92	11/30/92
		12/01/92	12/01/92	12/01/92	11/30/92	12/30/93	01/04/93	12/01/92	03/02/93	12/02/92	10/18/92	11/23/92	12/01/92	12/01/92
Feb 1 1993	Identification of Waste Disposal Facilities	02/18/93	01/23/93	11/03/92	01/19/93	05/25/94	02/03/93	09/23/92	02/04/93	12/07/92	07/30/92	02/02/93	01/27/93	02/18/93
			01/23/93	11/03/92	02/18/93	05/25/94	02/03/93	10/01/92	02/08/93	02/04/93	10/18/92	01/03/93	01/28/93	03/06/93
Mar 1 1993	Identification of Industries by SIC Code	02/03/93	01/25/93	05/11/93	02/22/93	10/03/94 **	02/03/93	12/02/92	02/04/93	03/08/93	12/06/92	10/28/92	01/27/93	03/09/93
		12/14/93	01/27/93	05/11/93	03/02/93	10/03/94 **	02/03/93	12/03/92	02/08/93	03/10/93	12/06/92	10/27/92	01/27/93	03/09/93
Apr 1 1993	Development of Early Action BMP Plan	04/12/93	03/29/93	04/05/93	04/07/93		04/06/93	03/31/93	03/31/93	03/30/93	04/05/93	04/05/93	04/07/93	04/22/93
		04/13/93	03/29/93	04/05/93	04/07/93		04/06/93	04/01/93	04/01/93	03/31/93	04/05/93	04/05/93	04/07/93	04/22/93
Apr 19 1993	Submission of Signature Block	04/22/93	04/22/93	04/26/93	04/26/93		04/26/93	04/12/93	04/12/93	04/12/93	04/20/93		04/22/93	04/19/93
		04/22/93	04/22/93	04/21/93	04/26/93		04/26/93	04/12/93	04/12/93	04/12/93	04/20/93		04/22/93	04/19/93
May 13 1993	Required Legal Authority for Regulation of Stormwater/Urban Runoff	09/08/94 **	07/12/93	05/18/93	05/12/93		09/23/93	04/26/93	04/26/93	05/18/93	09/20/91		07/08/93	05/13/93
	Stormwater Permit	09/08/94 **	07/13/93	05/18/93	05/17/93		09/28/93	04/26/93	04/26/93	05/24/93	10/18/92		07/08/93	05/17/93
	Implementation Agreement	05/05/93	05/13/93	05/24/93	05/18/93	09/07/93	09/23/93	05/18/93	09/02/93	05/18/93		09/04/93	05/25/93	11/04/93
		05/05/93	05/13/93	05/24/93	05/18/93	09/07/93	09/28/93	05/18/93	09/02/92	05/24/93		09/25/93	05/25/93	11/04/93

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES

as of December 6, 1994

Dead- lines	Activities	Pasadena	Pomona	Rosemead	San Dimas	San Fernando	San Gabriel	San Marino	Sierra Madre	South El Monte	South Pasadena	Temple City	Walnut	West Covina
Sept 30 1992	Submission of Existing Rainfall Data	09/21/92	10/08/92	09/22/92	09/09/92	10/31/92	09/29/92	10/07/92	10/13/92	09/12/92	10/20/92	09/26/92	09/30/92	09/15/92
	Submission of Existing Flow Data	09/21/92	10/08/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	10/13/92	09/12/92	10/20/92	09/26/92	09/30/92	09/15/92
	Submission of Existing Water Quality Data	09/21/92	10/08/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	11/24/92	09/12/92	10/20/92	09/26/92	09/30/92	09/15/92
	Submission of Existing Water Quality Data	09/21/92	10/08/92	09/22/92	09/14/92	10/05/92	09/29/92	10/07/92	11/25/92	09/20/92	10/20/92	10/06/92	09/30/92	09/17/92
Oct 30 1992	Alignment of Stormdrain	11/03/92	11/18/92	11/02/92	11/25/92	07/29/92	10/28/92	04/28/94	12/01/92	10/18/92	11/12/92	10/23/92	11/01/92	07/28/92
	Identification of Natural Drainage Watercourses	11/03/92	11/18/92	11/02/92	11/23/92	07/29/92	10/28/92	04/28/94	12/01/92	10/26/92	11/18/92	11/02/92	11/02/92	10/06/92
	Identification of Private Drainage Systems	11/03/92	11/18/92	11/02/92	11/23/92	07/29/92	11/24/92	04/28/94	12/01/92	10/19/92	11/12/92	10/29/92	11/01/92	07/28/92
	Definition of Drainage Boundaries	11/03/92	11/18/92	11/02/92	11/23/92	09/15/92	10/29/92	04/28/94	12/01/92	10/26/92	11/18/92	11/02/92	11/02/92	10/06/92
	Definition of Drainage Boundaries	11/03/92	11/18/92	11/02/92	11/23/92	09/15/92	11/24/92	04/28/94	12/01/92	10/26/92	11/18/92	11/04/92	11/02/92	03/29/93
	Definition of Drainage Boundaries	11/03/92	11/18/92	11/02/92	11/23/92	10/20/92	12/03/92	04/28/94	04/07/93	10/19/92	11/12/92	11/18/92	11/25/92	07/28/92
Nov 30 1992	Determination of Existing BMPs for Construction Sites	12/02/92	12/02/92	11/30/92	09/09/92	11/24/92	11/30/92	12/02/93	11/24/92	12/01/92		11/18/92	11/30/92	01/05/93
	Existing BMPs for Illegal Discharge & Disposal Practices	12/02/92	12/02/92	11/30/92	09/09/92	11/24/92	11/30/92	12/02/93	11/24/92	11/30/92		11/18/92	11/30/92	01/05/93
	Existing BMPs for Residential, Commercial, & Industrial	12/02/92	12/02/92	11/30/92	09/09/92	11/24/92	11/30/92	12/02/93	11/24/92	11/30/92		11/17/92	11/30/92	01/05/93
	Existing BMPs for Residential, Commercial, & Industrial	12/02/92	12/02/92	12/01/92	09/14/92	11/24/92	12/01/92	12/02/93	11/25/92	12/01/92		11/17/92	11/30/92	01/05/93
	Existing BMPs for Residential, Commercial, & Industrial	12/02/92	12/02/92	12/01/92	09/14/92	11/24/92	12/01/92	12/02/93	11/25/92	12/01/92		11/17/92	11/30/92	01/05/93
Feb 1 1993	Identification of Waste Disposal Facilities	02/02/93	02/03/93	02/03/93	09/09/92	10/01/92	01/20/93	12/02/93	11/24/92	09/19/94 **	09/04/93	10/30/92	11/30/92	09/15/92
	Identification of Industries by SIC Code	03/09/93	04/15/93	02/09/93	03/04/93	01/19/93	02/17/93	12/02/93	11/25/92	09/19/94 **	09/04/93	11/02/92	11/30/92	02/04/93
Mar 1 1993	Identification of Industries by SIC Code	03/09/93	04/15/93	02/09/93	03/04/93	01/19/93	02/17/93	12/02/93	11/25/92	09/19/94 **	09/04/93	11/18/92	12/02/92	03/08/93
	Identification of Industries by SIC Code	03/09/93	04/15/93	02/09/93	03/04/93	01/19/93	02/17/93	12/02/93	11/25/92	09/19/94 **	09/04/93	11/18/92	12/02/92	03/08/93
Apr 1 1993	Development of Early Action BAP Plan	03/23/93	04/12/93	04/05/93	04/12/93	04/01/93	03/31/93	12/10/93	04/08/93	04/01/93			03/31/93	03/28/93
	Development of Early Action BAP Plan	04/07/93	04/12/93	04/05/93	04/12/93	04/01/93	03/31/93	12/10/93	04/08/93	04/01/93			04/01/93	04/01/93
Apr 19 1993	Submission of Signature Block	04/12/93	04/22/93	04/12/93	04/21/93	04/15/93	04/21/93	04/26/93	04/26/93	04/22/93		04/26/93	04/12/93	04/12/93
	Submission of Signature Block	04/12/93	04/22/93	04/12/93	04/21/93	04/15/93	04/21/93	04/26/93	04/26/93	04/22/93		04/26/93	04/12/93	04/12/93
May 13 1993	Required Legal Authority for Regulation of Stormwater/Urban Runoff	05/13/93	09/02/93	05/11/93	10/05/94 **	09/08/93	05/12/93	12/10/93		09/22/94 **			04/28/93	05/17/93
	Required Legal Authority for Regulation of Stormwater/Urban Runoff	05/17/93	09/08/93	05/11/93	10/05/94 **	09/08/93	05/17/93	12/10/93		09/22/94 **			04/28/93	05/17/93
	Stormwater Permit Implementation Agreement	09/17/93	09/02/93	09/30/93	05/25/93	12/07/93	05/12/93	09/18/93	09/24/93	09/08/93	10/05/93	11/29/93	05/20/93	09/21/93
	Stormwater Permit Implementation Agreement	09/17/93	09/08/93	09/30/93	05/25/93	12/07/93	05/12/93	09/18/93	09/24/93	09/08/93	10/05/93	11/29/93	05/20/93	09/21/93

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STATUS OF YEAR 2 ACTIVITIES FOR PHASE II AGENCIES

as of December 6, 1994

Deadline	Activity	Alhambra	Arcadia	Azusa	Baldwin Park	Bradbury	Burbank	Calabasas	Canoga	Clermont	Covina	Diamond Bar	Duarte	El Monte
Jul 1 1993	Identification of Marchiole	08/23/93	07/01/93	10/28/92	07/08/94	11/08/93		NA	08/24/93	11/23/93	08/24/93	08/22/93	08/24/93	08/30/93
	Catch Basin & Stationing Info	08/29/93	08/28/94	10/29/92	07/08/94	11/08/93		NA	08/21/94	12/08/93	08/19/93	08/22/93	08/17/94	07/08/93
	Databases (1/2" Disk) of Size & Type of Each Drain	08/23/93	04/04/94	11/30/92	07/08/94	11/08/93		NA	08/24/93	12/01/93	08/24/93	12/18/93	08/24/93	08/30/93
Jul 1 1994	Schedule for Databases (1/2" Disk) of Connection Inventory	08/23/93	11/30/92	07/07/93	11/08/93			NA	08/24/93	12/01/93	08/24/93	12/15/93	08/24/93	08/30/93
	24-Hour Spill Response Telephone Number	08/27/93	08/27/93	08/08/93	10/08/93	11/08/93	10/27/93	NA	12/02/93	10/12/93	10/14/93	12/08/93	10/14/93	08/10/93
Apr 13 1994	Plan for Additional BMPs for Residential, Commercial & Industrial	04/11/94	04/13/94	03/03/94	04/13/94	08/21/94 **	NA	08/08/94 **	04/12/94	04/13/94	03/31/94	03/28/94	04/13/94	04/13/94
	Plan for Additional BMPs for Segal Discharge & Disposal Practices	04/11/94	04/13/94	03/03/94	04/13/94	08/21/94 **	NA	08/08/94 **	04/12/94	04/13/94	03/31/94	03/28/94	04/13/94	04/13/94
	Plan for Additional BMPs for Construction Sites	04/11/94	04/13/94	03/03/94	08/01/94 **	08/21/94 **	NA	08/08/94 **	04/12/94	04/13/94	04/04/94	03/28/94	08/08/94 **	08/08/94 **
	Evidence of Progress of Implementation of Early Action BMPs	05/09/94	05/31/94	03/03/94	08/08/94		NA	08/21/94 **	04/04/94	08/31/94	08/12/94		03/28/94	04/13/94
May 31 1994	Evidence of All Legal Authority for Regulation of Stormwater Runoff	08/28/94	05/31/94	08/08/93	08/01/94		NA	08/25/94	08/28/94	08/31/94	08/12/94	08/12/94	07/12/94	08/02/94
		08/28/94	05/31/94	08/08/93	08/01/94		NA	08/25/94	08/28/94	08/31/94	08/12/94	08/12/94	07/12/94	08/02/94

Deadline	Activity	Glendale	Glendora	Hidden Hills	Industry	Inverdale	La Granda Fluvridge	La Habra Heights	La Puente	La Verne	Los Angeles	Morongo	Montebello	Monterey Park
Jul 1 1993	Identification of Marchiole	08/07/93	07/08/93	07/01/93	10/28/92	12/18/93	10/18/93	08/21/93	04/12/93	11/28/92		08/22/93	10/28/92	11/28/93
	Catch Basin & Stationing Info	08/07/93	12/20/93	12/01/94	04/17/93	18/15/93	10/18/93	08/24/93	04/12/93	02/02/93		08/22/93	03/08/94	11/28/93
	Databases (1/2" Disk) of Size & Type of Each Drain	08/07/93	07/07/93	07/01/93	08/14/93	12/18/93	10/18/93	08/30/93	04/12/93	08/08/94		12/01/93	07/08/93	07/28/93
Jul 1 1994	Schedule for Databases (1/2" Disk) of Connection Inventory	08/07/93	11/20/94	07/01/93	08/14/93	12/18/93	10/18/93	08/30/93	04/12/93	08/08/94		12/01/93	03/08/94	12/08/94
	24-Hour Spill Response Telephone Number	08/27/93	11/02/94				10/18/93		04/12/93	08/08/94		12/01/93	03/08/94	12/08/94
Apr 13 1994	Plan for Additional BMPs for Residential, Commercial & Industrial	04/14/94	04/13/94	04/14/94	04/08/94		03/17/94	04/14/94	04/14/94	08/03/94 **	04/27/94		04/13/94	08/12/94 **
	Plan for Additional BMPs for Segal Discharge & Disposal Practices	04/14/94	04/13/94	04/14/94	04/08/94		03/17/94	04/14/94	04/14/94	08/03/94 **	04/27/94		04/13/94	08/12/94 **
	Plan for Additional BMPs for Construction Sites	04/14/94	04/13/94	04/14/94	04/08/94		03/17/94	04/14/94	04/14/94	08/03/94 **	04/27/94		04/13/94	08/12/94 **
	Evidence of Progress of Implementation of Early Action BMPs	08/31/94	08/31/94	08/24/94	08/07/94		08/28/94		04/14/94	08/03/94 **	04/27/94		04/13/94	08/03/94
May 31 1994	Evidence of All Legal Authority for Regulation of Stormwater Runoff	08/08/94	08/08/94	08/24/94	08/08/94		08/07/94		08/08/94	08/03/94 **	04/27/94		08/31/94	08/03/94
		08/08/94	08/08/94	08/24/94	08/08/94		08/07/94		08/08/94	08/03/94 **	04/27/94		08/31/94	08/03/94

NA - Not applicable (any approved by CROWD to be covered under other phases)

\*\* Fund by CROWD approved to be covered under other phases  
\* - Late for county/submitter review

Date Provided Same Date/submitter Available As To Form

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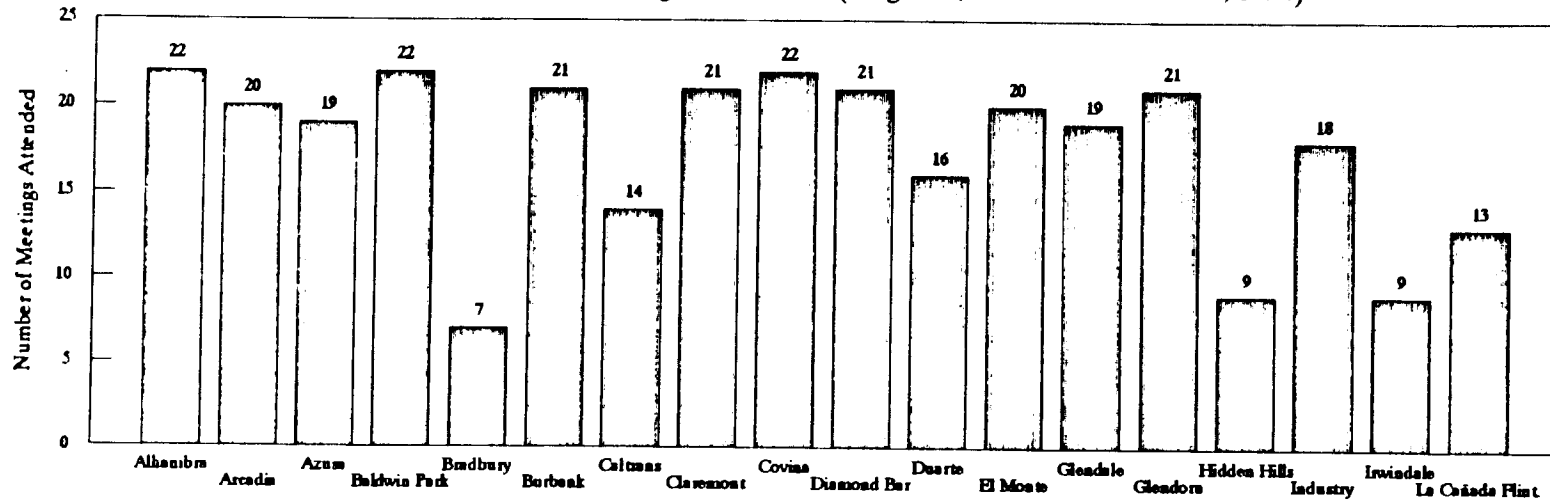
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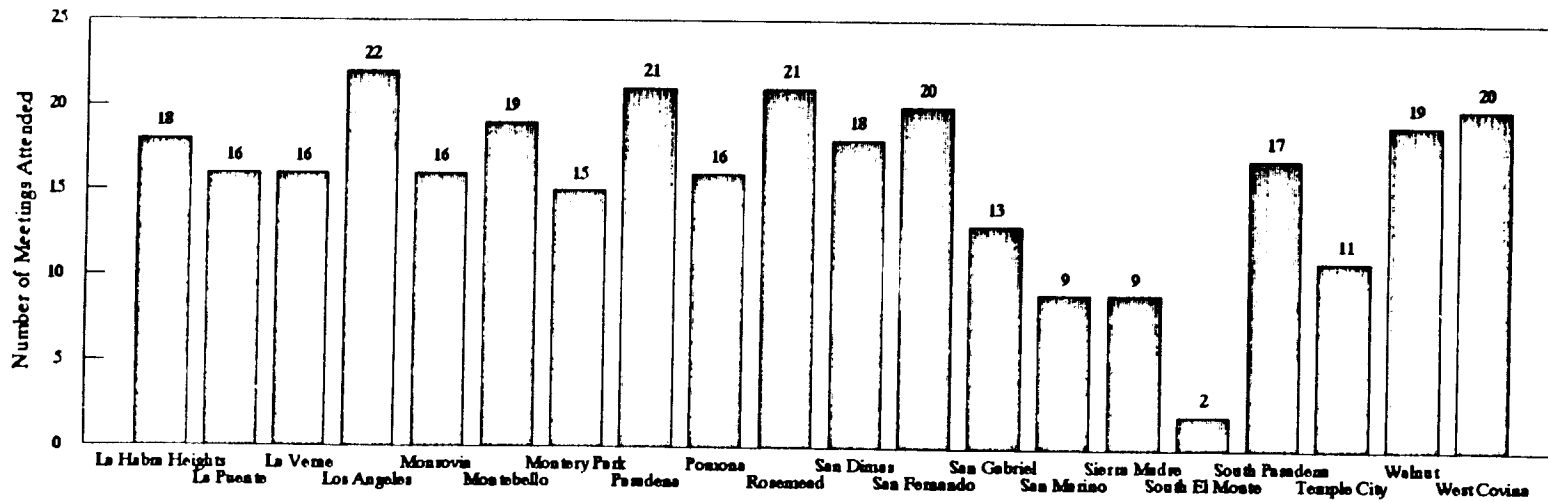


# Phase II Agencies PERMITTEE MEETING ATTENDANCE

Number of Meetings to Date: 22 (August 5, 1992 to December 6, 1994)



SEM/A:ATTENDIIA.CGM



SEM/A:ATTENDIIB.CGM

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**PERMITTEE MEETING ATTENDANCE**  
Phase II Cities

Meeting Date	Alhambra	Artes	Azusa	Baldwin Park	Burbank	Chico	Claremont	Covina	Downey	Duarte	El Monte	Glendale	Glendora	Hawthorne Hills	Industry	Irwindale	La Habra	La Puente
April 2, 1992																		
September 2, 1992																		
October 7, 1992																		
November 4, 1992																		
December 2, 1992																		
January 3, 1993																		
March 3, 1993																		
April 7, 1993																		
May 5, 1993																		
June 2, 1993																		
July 7, 1993																		
August 4, 1993																		
October 6, 1993																		
January 1, 1994																		
February 2, 1994																		
April 6, 1994																		
June 1, 1994																		
August 3, 1994																		
September 7, 1994																		
October 5, 1994																		
November 2, 1994																		
December 7, 1994																		
<b>TOTAL</b>	22	20	19	22	7	21	14	21	22	21	16	20	19	9	18	9		

Meeting Date	Alhambra	La Puente	La Verde	Los Angeles	Monrovia	Montebello	Monterey Park	Pasadena	Pomona	Rosemead	San Dimas	San Fernando	San Gabriel	San Marino	Sierra Madre	South El Monte	South Pasadena	Temple City	Walnut	West Covina	
April 2, 1992																					
September 2, 1992																					
October 7, 1992																					
November 4, 1992																					
December 2, 1992																					
January 3, 1993																					
March 3, 1993																					
April 7, 1993																					
May 5, 1993																					
June 2, 1993																					
July 7, 1993																					
August 4, 1993																					
October 6, 1993																					
January 1, 1994																					
February 2, 1994																					
April 6, 1994																					
June 1, 1994																					
August 3, 1994																					
September 7, 1994																					
October 5, 1994																					
November 2, 1994																					
December 7, 1994																					
<b>TOTAL</b>	18	16	16	22	16	10	17	21	16	21	18	20	13	9	9	2	17	11	19	20	

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES

as of: December 6, 1994

Dead- lines	Activities	Alhambra	Artesia	Bell	Bell Gardens	Bellflower	Cerritos	Carson	Cerritos	Commerce	Compton	Cudahy	Downey	El Segundo	Gardena	Glendale	Hawthorn Gardens
	Letter of Intent	NA	09/16/93	08/24/93	08/23/93	08/21/93	NA	09/08/93	09/24/93	09/08/93	07/28/93	09/21/93	09/21/93	NA	08/05/93	NA	07/01/93
Sept 30 1993	Submission of Existing Permit Data	NA	03/07/94	08/31/93	09/21/93	09/03/93	09/22/93	08/31/93	09/22/93	03/08/94 **	02/28/94 **	09/25/93	09/25/93	*	09/28/93	NA	03/03/94
	Submission of Existing Flow Data	NA	03/07/94	08/31/93	09/21/93	09/03/93	09/22/93	08/31/93	09/22/93	03/08/94 **	02/28/94 **	09/25/93	09/25/93	*	09/28/93	NA	03/03/94
	Submission of Existing Water Quality Data	NA	03/22/94	08/31/93	09/21/93	09/03/93	09/22/93	08/31/93	09/22/93	03/08/94 **	02/28/94 **	09/25/93	09/25/93	*	09/28/93	NA	03/03/94
		NA	01/22/94	09/31/93	09/21/93	09/05/93	09/27/93	09/31/93	09/22/93	04/18/94 **	09/06/94 **	09/25/93	09/25/93	*	09/28/93	NA	09/24/94 *
		NA	10/25/93	09/07/93	09/07/93	09/27/93	09/30/93	09/27/93	10/04/93	11/08/93	11/08/93	09/18/93	11/17/93	*	11/08/93	NA	09/24/94 **
Oct 14 1993	Telephone Number	NA	10/25/93	09/07/93	09/07/93	09/27/93	09/30/93	09/27/93	10/05/93	11/08/93	11/08/93	09/18/93	11/17/93	*	12/06/93	NA	11/08/93
Oct 28 1993	Alignment of Storm drain	NA	NA	10/28/93	11/01/93	10/06/93	09/20/94	10/20/93	11/03/93	NA	10/07/93	10/28/93	10/27/93	*	10/07/93	NA	NA
	Identification of Natural Drainage Watercourses	NA	NA	10/28/93	10/27/93	09/27/93	09/20/94	10/20/93	11/03/93	NA	10/07/93	10/28/93	10/27/93	*	10/07/93	NA	NA
	Identification of Private Drainage Systems	NA	NA	10/28/93	10/27/93	09/27/93	09/20/94	10/20/93	11/03/93	NA	10/07/93	10/28/93	10/27/93	*	10/07/93	NA	NA
	Definition of Drainage Boundaries	NA	NA	10/28/93	10/27/93	09/27/93	09/20/94	10/20/93	11/03/93	NA	10/07/93	10/28/93	10/27/93	*	10/07/93	NA	NA
		NA	NA	11/02/93	11/02/93	10/06/93	09/20/94	10/20/93	11/03/93	NA	10/07/93	10/28/93	10/27/93	*	10/07/93	NA	NA
		NA	NA	11/02/93	11/02/93	10/06/93	09/20/94	10/20/93	11/03/93	NA	10/07/93	10/28/93	10/27/93	*	10/07/93	NA	NA
		NA	NA	11/02/93	11/02/93	10/06/93	09/20/94	10/20/93	11/03/93	NA	10/07/93	10/28/93	10/27/93	*	10/07/93	NA	NA
Nov 30 1993	Determination of Existing BMPs for Construction Sites	NA	09/21/94	11/30/93	11/24/93	11/23/93	12/01/93	11/29/93	12/22/93	09/28/94 **	07/18/94 **	11/30/93	11/24/93	*	11/29/93	NA	NA
	Existing BMPs for Illegal Discharges & Disposal Practices	NA	09/21/94	11/30/93	11/24/93	11/23/93	12/01/93	11/29/93	12/22/93	09/28/94 **	07/18/94 **	11/30/93	11/24/93	*	11/29/93	NA	NA
	Existing BMPs for Residential Commercial & Industrial	NA	09/21/94	11/30/93	11/24/93	11/23/93	12/01/93	11/29/93	12/22/93	09/28/94 **	07/18/94 **	11/30/93	11/24/93	*	11/29/93	NA	NA
		NA	09/21/94	11/30/93	11/24/93	11/23/93	12/01/93	11/29/93	12/22/93	09/28/94 **	07/18/94 **	11/30/93	11/24/93	*	11/29/93	NA	NA
		NA	09/21/94	11/30/93	11/24/93	11/23/93	12/01/93	11/29/93	12/22/93	09/28/94 **	07/18/94 **	11/30/93	11/24/93	*	11/29/93	NA	NA
Feb 1 1994	Identification of Waste Disposal Facilities	NA	09/22/94	01/26/94	09/21/93	11/01/93	02/01/94	02/01/94	11/09/93	09/15/94 **	07/18/94 **	01/28/94	02/02/94	*	12/02/93	NA	NA
		NA	01/27/94	01/26/94	12/01/93	11/01/93	02/01/94	02/01/94	11/09/93	09/15/94 **	07/18/94 **	01/28/94	02/02/94	*	12/02/93	NA	NA
Mar 1 1994	Identification of Industries by SIC Code	NA	03/22/94	02/23/94	12/20/93	02/02/94	05/17/94	02/18/94	02/02/94	09/15/94	07/18/94 **	02/23/94	02/23/94	*	12/06/93	NA	NA
		NA	03/24/94	02/23/94	12/20/93	02/02/94	05/17/94	02/18/94	02/02/94	09/15/94	07/18/94 **	02/23/94	02/23/94	*	12/06/93	NA	NA
Mar 31 1994	Development of Early Action BMP Plan	NA	03/30/94	03/30/94	03/31/94	09/21/94 **	03/30/94	05/05/94 **	10/08/94 **			03/30/94	04/04/94	*	01/28/94	NA	NA
		NA	03/31/94	03/30/94	04/04/94	09/21/94 **	03/30/94	05/05/94 **	10/08/94 **			03/30/94	04/04/94	*	01/28/94	NA	NA
May 12 1994	Required Legal Authority for Regulation of Stormwater Urban Runoff	NA		04/28/94	01/20/94	03/03/94	08/28/94 **	08/12/94	05/05/94	09/28/94 **		04/28/94	09/31/94	*	03/31/94	NA	NA
		NA		04/28/94	01/20/94	03/18/94	08/28/94 **	08/12/94	05/05/94	09/28/94 **		04/28/94	09/31/94	*	03/31/94	NA	NA
	Stormwater Permit Implementation Agreement	NA	08/10/94	08/12/94	11/08/93	05/02/94	04/28/94	08/12/94	08/18/94	12/01/94 **	08/28/94	05/12/94	04/04/94	NA	11/16/93	NA	08/18/94
		NA	08/10/94	08/12/94	11/08/93	05/02/94	04/28/94	08/12/94	08/18/94	12/01/94 **	08/28/94	05/12/94	04/04/94	NA	11/28/93	NA	08/18/94

NA = Not applicable or agency approved by CWAQCS to be covered under other phases

\* = Pending CWAQCS approval to be covered under other phases  
\*\* = Late for countywide review

Data Received  
 Data Determined Acceptable As to Form

R0032787

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VOL

## STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES

as of December 6, 1994

Deadline	Activities	Hawthorne	Huntington Park	Inglewood	La Canada Flintridge	La Habra Heights	La Mirada	Lakewood	Lawndale	Lomita	Long Beach	Los Angeles	Lynwood	Maywood	Montebello	Norwalk	Palos Verdes Estates
	Letter of Intent	02/03/93	02/01/93	NA	04/22/93	NA	07/21/93	06/30/93	06/21/93	06/14/93	06/10/93	NA	06/21/93	06/30/93	NA	06/24/93	NA
Sept 30 1993	Submittal of Existing Rainfall Data	06/18/93	06/05/93	*	06/05/93	04/18/94	06/29/93	06/26/93	06/28/93	03/07/94 **	06/27/93	06/27/93	06/06/93	06/25/93	NA	06/13/93	NA
	Submittal of Existing Flow Data	06/18/93	06/05/93	*	06/05/93	04/18/94	06/29/93	06/26/93	06/28/93	03/07/94 **	06/27/93	06/06/93	06/06/93	06/25/93	NA	06/13/93	NA
	Submittal of Existing Water Quality Data	06/18/93	06/05/93	*	06/05/93	04/18/94	06/29/93	06/26/93	06/28/93	03/07/94 **	06/27/93	06/06/93	06/06/93	06/25/93	NA	06/13/93	NA
	24-Hour Spill Response Telephone Number	01/26/94	10/05/93	*	10/14/93	01/12/94	01/12/94	11/10/93	10/26/93	02/10/94	06/27/93	07/07/93	11/16/93	09/16/93	NA	10/16/93	NA
	Alignment of Stormdrain	10/27/93	10/05/93	*	10/18/93	NA	10/27/93	10/27/93	10/26/93	NA	10/27/93	10/27/93	08/15/94	10/26/93	NA	10/27/93	NA
Oct 14 1993	Identification of Natural Drainage Watercourses	10/27/93	09/05/93	*	10/18/93	NA	10/27/93	10/27/93	10/26/93	NA	10/27/93	11/01/93	08/15/94	11/02/93	NA	11/02/93	NA
	Identification of Private Drainage Systems	10/27/93	09/05/93	*	10/18/93	NA	10/27/93	10/27/93	10/26/93	NA	10/27/93	11/01/93	08/15/94	11/02/93	NA	11/02/93	NA
	Definition of Drainage Boundaries	11/01/93	10/20/93	*	10/18/93	NA	11/20/93	11/02/93	NA	10/27/93	11/01/93	08/15/94	11/02/93	NA	11/02/93	NA	
	Determination of Existing BMPs for Construction Sites	11/30/93	11/30/93	*	11/23/93	NA	11/24/93	12/01/93	11/30/93	11/30/93	11/30/93	03/13/91	08/15/94	11/30/93	NA	11/23/93	NA
	Existing BMPs for Illegal Discharge & Disposal Practices	11/30/93	11/30/93	*	11/23/93	NA	11/24/93	12/01/93	11/30/93	11/30/93	11/30/93	03/13/91	08/15/94	11/30/93	NA	11/23/93	NA
Nov 30 1993	Existing BMPs for Residential Commercial & Industrial	11/30/93	11/30/93	*	11/23/93	NA	09/31/94	12/01/93	11/30/93	11/30/93	11/30/93	03/13/91	08/15/94	11/30/93	NA	11/23/93	NA
	Identification of Waste Disposal Facilities	01/26/94	01/10/94	*	12/07/93	NA	01/26/94	02/02/94	02/02/94	01/31/94	07/03/91	08/08/93	01/26/94	NA	02/01/94	NA	
Mar 1 1994	Identification of Industries by SIC Code	03/02/94	10/05/93	*	12/07/93	NA	02/23/94	11/10/93	03/02/94	10/27/93	10/08/92	08/08/93	02/23/94	NA	02/15/94	NA	
	Development of Early Action BMP Plan	04/04/94	03/17/94	*	02/02/94	NA	02/23/94	11/10/93	03/02/94	10/27/93	10/08/92	08/08/93	02/23/94	NA	02/15/94	NA	
May 12 1994	Required Legal Authority for Regulation of Stormwater/Urban Runoff	05/24/94	05/02/94	*	04/27/94	NA	05/16/94	05/12/94	05/26/94	05/12/94	05/12/94	06/20/91	08/15/94	04/28/94	NA	06/06/94	NA
	Stormwater Permit Implementation Agreement	05/24/94	02/24/94	NA	NA	NA	10/04/93	05/16/94	05/26/94	06/20/94	05/12/94	11/18/93	05/12/94	NA	11/08/93	NA	
		05/24/94	02/24/94	NA	NA	NA	10/04/93	05/16/94	05/26/94	06/20/94	05/12/94	11/18/93	05/12/94	NA	11/08/93	NA	

NA = Not applicable or agency approved by CRWOCB to be covered under other phases

\* = Pending CRWOCB approval to be covered under other phases  
 \*\* = Late for countywide review

□ Date Received  
 □ Date Determined Acceptable As to Form

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LTA VISA PHASE III

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES

as of December 6, 1994

Deadline	Activities	Paramount	Pasadena	Pico Rivera	Rancho Pabre Verdes	Rejondo Beach	Rolling Hills	Rolling Hills Est.	Santa Clarita	Santa Fe Springs	Signal Hill	South Gate	South Pasadena	Torrance	Vernon	Whittier
Sept 30 1993	Letter of Intent	06/06/93	NA	06/24/93	NA	NA	NA	NA	06/14/93	06/19/93	06/21/93	06/24/93	NA	NA	06/06/93	06/21/93
	Submission of Existing Rainfall Data	09/20/93	NA	09/07/93	NA	NA	NA	NA	09/27/93	09/21/93	09/31/93	09/16/93	NA	NA	09/21/93	09/08/93
	Submission of Existing Flow Data	09/20/93	NA	09/07/93	NA	NA	NA	NA	09/27/93	09/21/93	09/31/93	09/16/93	NA	NA	09/21/93	09/08/93
	Submission of Existing Water Quality Data	09/20/93	NA	09/07/93	NA	NA	NA	NA	09/27/93	09/21/93	09/31/93	09/23/93	NA	NA	09/21/93	09/08/93
	24-Hour Spill Response Telephone Number	09/07/93	NA	10/28/93	05/27/93	03/07/94	NA	09/07/93	10/12/93	10/18/93	09/31/93	09/29/93	NA	09/09/93	10/28/93	09/08/93
Oct 28 1993	Alignment of Storm Drain	10/27/93	NA	10/28/93	NA	NA	NA	NA	10/27/93	10/27/93	11/01/93	10/27/93	NA	11/03/93	10/28/93	10/27/93
	Identification of Natural Drainage Watercourses	11/01/93	NA	11/02/93	NA	NA	NA	NA	11/01/93	11/01/93	11/10/93	11/02/93	NA	11/03/93	11/02/93	11/01/93
	Identification of Private Drainage Systems	10/27/93	NA	10/28/93	NA	NA	NA	NA	10/27/93	10/27/93	11/01/93	10/27/93	NA	11/03/93	10/28/93	10/27/93
	Definition of Drainage Boundaries	11/01/93	NA	11/02/93	NA	NA	NA	NA	11/01/93	11/01/93	11/10/93	11/02/93	NA	11/03/93	11/02/93	11/01/93
	Determination of Existing BMPs for Construction Sites	11/24/93	NA	12/01/93	NA	NA	NA	NA	11/29/93	11/24/93	12/01/93	11/24/93	NA	NA	11/29/93	12/01/93
	Existing BMPs for Illegal Discharge & Disposal Practices	11/24/93	NA	12/01/93	NA	NA	NA	NA	11/29/93	11/24/93	12/01/93	11/24/93	NA	NA	11/29/93	12/01/93
Feb 1 1994	Identification of Waste Disposal Facilities	09/20/93	NA	09/07/93	NA	NA	NA	NA	10/14/93	01/31/94	01/25/94	01/31/94	NA	NA	02/01/94	02/02/94
	Identification of Industries by SIC Code	12/20/93	NA	09/07/93	NA	NA	NA	NA	12/09/93	03/01/94	06/24/93	06/13/93	NA	NA	02/01/94	02/02/94
Mar 31 1994	Development of Early Action BMP Plan	03/30/94	NA	04/05/94	NA	NA	NA	NA	03/31/94	03/31/94	03/24/94	03/17/94	NA	NA	03/26/94	03/31/94
	Development of Stormwater/Urban Runoff Stormwater Permit Implementation Agreement	01/20/94	NA	09/07/93	NA	NA	NA	NA	03/18/94	05/12/94	04/26/94	11/19/93	NA	NA	05/11/94	05/12/94
May 12 1994	Development of Stormwater/Urban Runoff Stormwater Permit Implementation Agreement	02/08/94	NA	06/24/93	NA	NA	NA	NA	05/12/94	05/12/94	04/27/94	09/28/93	NA	NA	12/27/93	09/08/94
	Development of Stormwater/Urban Runoff Stormwater Permit Implementation Agreement	02/08/94	NA	06/24/93	NA	NA	NA	NA	05/12/94	05/12/94	04/27/94	09/28/93	NA	NA	12/27/93	09/08/94

NA = Not applicable or agency approved by CRWQCB to be covered under other phases

□ = Pending CRWQCB approval to be covered under other phases  
 □ = Late for county/city review

□ = Date Received  
 □ = Date Determined Acceptable As to Form

LTA V&M PHASE III

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### STATUS OF YEAR 2 ACTIVITIES FOR PHASE III AGENCIES

as of December 8, 1994

Dead-line	Activities	Alhambra	Artesia	Bell	Bell Gardens	Bell Flower	Caltrans	Carson	Centos	Commerce	Compton	Cudahy	Dowsey	El Segundo	Gardena	Glendale	
Jul 1 1994	Identification of Manhole Catch Basin & Stationing Info	NA	NA	06/30/94	01/27/94	06/21/93	09/20/94	06/30/94	06/30/94	NA	10/07/93	06/30/94	07/05/94	*	02/16/94	NA	
	Database (3 1/2" Disk) of Size & Type of Each Drain	NA	NA	07/12/94	01/27/94	06/03/94			07/14/94	NA		07/12/94	06/24/94	*	02/17/94	NA	
	Schedule for Database (3 1/2" Disk) of Connection Inventory	NA	NA	06/30/94	01/20/94	07/27/94	09/20/94			06/30/94	NA		06/30/94	07/05/94	*	02/16/94	NA
		NA	NA	07/12/94	01/27/94	09/01/94				07/14/94	NA		07/12/94	06/24/94	*	02/17/94	NA
Apr 13 1995	Plan for Additional BMPs for Residential, Commercial & Industrial	NA			01/20/94	06/03/94				NA				*	11/02/94	NA	
	Plan for Additional BMPs for Illegal Discharges & Disposal Practices	NA			01/27/94	06/03/94				NA				*	09/14/94	NA	
	Plan for Additional BMPs for Construction Sites	NA												*	06/14/94	NA	
		NA												*	06/14/94	NA	
May 31 1995	Evidence of Progress of Implementation of Early Action BMPs	NA												*	09/14/94	NA	
May 31 1995	Evidence of All Legal Authority for Regulation of Stormwater/Runoff	NA					03/03/94	05/25/94					05/31/94	*		NA	
							03/21/94	05/25/94					05/31/94	*		NA	

Dead-line	Activities	Hawthorn Gardens	Hawthorne	Huntington Park	Inglewood	La Canada Flintridge	La Habra Heights	La Mirada	Lakewood	Lawndale	Lomita	Long Beach	Los Angeles	Lynwood	Maywood	Montebello
Jul 1 1994	Identification of Manhole Catch Basin & Stationing Info	NA	07/05/94	04/18/94	*	10/18/93	NA		11/01/93	NA	NA	06/22/94	NA	06/15/94	06/30/94	NA
	Database (3 1/2" Disk) of Size & Type of Each Drain	NA	07/06/94	06/30/94	*	04/27/94	NA		NA	NA	NA	06/22/94	NA	06/15/94	07/12/94	NA
		NA	07/06/94	06/15/94	*	02/23/94	NA		NA	NA	NA	NA	06/30/94	NA	06/15/94	06/30/94
Jul 3 1995	Schedule for Database (3 1/2" Disk) of Connection Inventory	NA	06/15/94	06/30/94	*	03/08/94	NA		NA	NA	NA	06/30/94	NA	06/15/94	07/12/94	NA
		NA		06/30/94	*	03/08/94	NA		NA	NA	NA		NA			NA
Apr 13 1995	Plan for Additional BMPs for Residential, Commercial & Industrial				*		NA						NA			NA
	Plan for Additional BMPs for Illegal Discharges & Disposal Practices				*		NA						NA			NA
	Plan for Additional BMPs for Construction Sites				*		NA						NA			NA
					*		NA						NA			NA
May 31 1995	Evidence of Progress of Implementation of Early Action BMPs				*		NA						NA			NA
May 31 1995	Evidence of All Legal Authority for Regulation of Stormwater/Runoff		06/24/94		*		NA						NA			NA
			05/24/94		*		NA						NA			NA

NA = Not applicable or agency approved by CROWCOB to be covered under other phase

\* = Pending CROWCOB approval to be covered under other phase  
 \*\* = Late for countywide public review

Data Received  
 Data Determined Acceptable As To Phase

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**STATUS OF YEAR 2 ACTIVITIES FOR PHASE III AGENCIES**

as of: December 8, 1994

Deadline	Activity	Norwalk	Palos Verdes Estates	Paramount	Pasadena	Pico Rivera	Rancho Palos Verdes	Redondo Beach	Rolling Hills	Rolling Hills Est	Santa Clarita	Santa Fe Springs	Signal Hill	South Gate	South Pasadena	Torrance	Vernon	Whittier
Jul 1 1994	Identification of Manhole Catch Basin & Stationing Info	10/27/93	NA	11/01/93	NA	11/02/93	NA	NA	NA	NA	12/08/94	10/23/93	08/29/94	08/22/94	NA	NA	08/30/94	08/29/94
	Database (3 1/2" Disk) of Size & Type of Each Drain	10/27/93	NA	01/27/94	NA	11/02/93	NA	NA	NA	NA	08/15/94	08/20/94	08/23/94	NA	NA	07/26/94	08/24/94	
	Schedule for Database (1/2" Disk) of Connection Inventory	08/30/94	NA	01/20/94	NA		NA	NA	NA	NA	10/24/94	08/30/94	08/28/94	08/22/94	NA	NA	08/30/94	08/29/94
Apr 13 1995	Plan for Additional BMPs for Residential, Commercial, & Industrial Discharges & Disposal Practices	07/14/94	NA	01/27/94	NA		NA	NA	NA	NA			08/29/94	08/22/94	NA	NA		
	Plan for Additional BMPs for Construction Sites		NA	01/27/94	NA		NA	NA	NA	NA			08/29/94	08/23/94	NA	NA		
	Evidence of Progress of Implementation of Early Action BMPs		NA		NA		NA	NA	NA	NA					NA	NA		
	Evidence of All Legal Authority for Regulation of Stormwater Runoff		NA		NA		NA	NA	NA	NA					NA	NA		
May 31 1995	Evidence of All Legal Authority for Regulation of Stormwater Runoff		NA		NA		NA	NA	NA	NA			11/30/94		NA	NA		
			NA		NA		NA	NA	NA	NA			11/30/94		NA	NA		

NA - If all applicable agency approved by CRR/COCS to be covered under other phases

- Pending CRR/COCS approval to be covered under other phases  
 - Late for a municipality public notice

□ Date Received  
 □ Date Determined Acceptable As To Form

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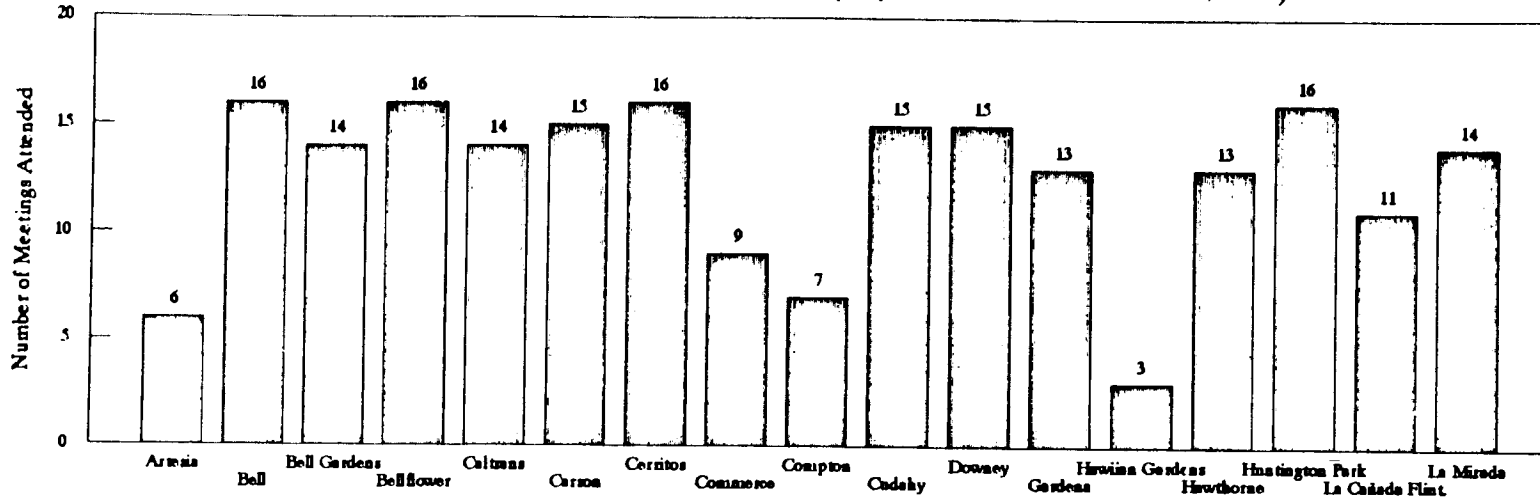
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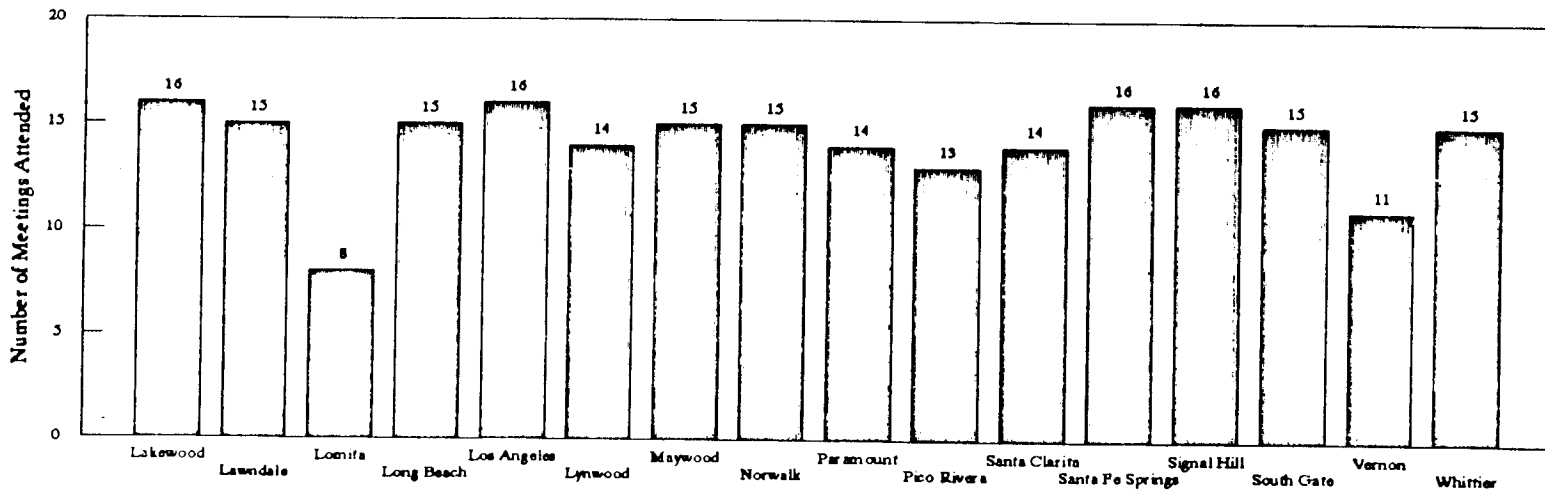


# Phase III Agencies MONTHLY PERMITTEE MEETING ATTENDANCE

Number of Meetings to Date: 16 (July 28, 1993 to November 23, 1994)



SEM/A ATTNDIII.CGM



SEM/A ATTNDIIB.CGM

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**MONTHLY PERMITTEE MEETING ATTENDANCE**  
Phase III Agencies

D

Meeting Date	Arroyo	Ball	Ball Gardens	Brilliant	Caltrans	Carson	Carroll	Commerce	Compton	Cudahy	Downey	Orange	Hawthorn Gardens	Hawthorne	Heatherly Park	La Habra Flats	La Habra
JUN 26, 1993		1	1	1	1	1	1			1	1						
AUG 25, 1993	1	1	1	1	1	1	1	1	1	1	1	1		1	1	1	1
SEPTEMBER 22, 1993		1	1	1	1	1	1			1	1	1		1	1	1	
OCTOBER 27, 1993		1	1	1	1	1	1			1	1	1		1	1	1	1
NOVEMBER 24, 1993		1	1	1	1	1	1			1	1	1		1	1	1	1
JANUARY 26, 1994		1	1	1	1	1	1	1	1	1	1	1		1	1	1	1
FEBRUARY 23, 1994		1	1	1	1	1	1	1	1	1	1	1		1	1	1	1
MARCH 23, 1994		1	1	1	1	1	1	1	1	1	1	1		1	1	1	1
APRIL 27, 1994	1	1	1	1	1	1	1	1		1	1	1		1	1	1	1
MAY 25, 1994	1	1	1	1	1	1	1	1		1	1	1		1	1	1	1
JUNE 22, 1994	1	1	1	1	1	1	1	1	1	1	1	1		1	1	1	1
JULY 27, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
AUGUST 24, 1994		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
SEPTEMBER 28, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
OCTOBER 26, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
NOVEMBER 23, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
<b>TOTAL</b>	<b>6</b>	<b>16</b>	<b>14</b>	<b>16</b>	<b>14</b>	<b>15</b>	<b>16</b>	<b>9</b>	<b>7</b>	<b>15</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>13</b>	<b>16</b>	<b>11</b>	<b>14</b>

Meeting Date	Lakewood	Lanvale	Lomita	Long Beach	Los Angeles	Lynwood	Maywood	Norwalk	Paramount	Pico Rivera	Santa Clarita	Santa Fe Spring	Signal Hill	South Gate	Venue	Whittier
JUN 26, 1993	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
AUG 25, 1993	1	1	1		1	1	1	1	1	1	1	1	1	1	1	1
SEPTEMBER 22, 1993	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
OCTOBER 27, 1993	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
NOVEMBER 24, 1993	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
JANUARY 26, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
FEBRUARY 23, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
MARCH 23, 1994	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
APRIL 27, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
MAY 25, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
JUNE 22, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
JULY 27, 1994	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
AUGUST 24, 1994	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
SEPTEMBER 28, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
OCTOBER 26, 1994	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
NOVEMBER 23, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
<b>TOTAL</b>	<b>16</b>	<b>15</b>	<b>8</b>	<b>15</b>	<b>16</b>	<b>14</b>	<b>15</b>	<b>15</b>	<b>14</b>	<b>13</b>	<b>14</b>	<b>16</b>	<b>16</b>	<b>15</b>	<b>11</b>	<b>15</b>

SRMA/ATTN:DW

The following are agencies in Phase I or Phase II which will not participate in Phase III because they have submitted a letter to the RWQCB indicating that all Phase III activities were covered under Phase I or Phase II:

- |                   |                           |                       |                     |               |
|-------------------|---------------------------|-----------------------|---------------------|---------------|
| El Segundo (I)    | Palos Verdes Estates (I)  | Alhambra (II)         | Montebello (II)     | Torrance (I)  |
| Inglewood (I)     | Rolling Hills (I)         | Glendale (II)         | Pasadena (II)       | Calabasas (I) |
| Redondo Beach (I) | Rolling Hills Estates (I) | La Habra Heights (II) | South Pasadena (II) |               |

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Dr. Robert P. Ghirelli  
December 14, 1994  
Page 3

- f. Advertise a Request for Proposal to develop a program to evaluate stormwater impacts on selected receiving waters including conducting toxicity studies in the Santa Monica Bay Drainage Basin.

Status: A Request for Proposal has been prepared for hiring a consultant to develop a program. Notices advertising the Request for Proposal will be mailed to prospective consultants on December 22 and proposal packages will be ready December 27.

- g. Submit a revised monitoring program for Phases II and III that includes all program elements with timelines for development and implementation.

Status: The consultant reviewing our proposed monitoring program will complete his report by next week. We will subsequently be revising the monitoring program for Phases II and III, addressing our consultant's recommendations plus providing timelines for development and implementation of Action Items "a-f" above. The revised plan is targeted for submittal by the beginning of January 1995.

As part of the Phase II and III monitoring program work plan originally submitted to your office on July 1, 1994, five mass emissions monitoring sites were proposed. An additional ten proposed monitoring sites will be included as part of the revised monitoring program work plan to be submitted in January 1995. Installation of these 15 stations for operation by October 1995, the start of the next rainy season, will necessitate that we begin detailed design and installation of these sites in January 1995. Therefore, we are requesting your approval of the five mass emission sites by December 31, 1994, and the additional ten sites by February 26, 1995.

If you have any questions regarding this matter, please contact the undersigned at (818) 458-3500, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Director of Public Works

  
DAVID YAMAHARA  
Assistant Deputy Director  
Waste Management Division

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Dr. Robert P. Ghirelli  
November 15, 1994  
Page 2

Status: Computer hardware and software necessary to run the basin-wide pollutant load model was originally scheduled for delivery on November 10, but is now expected for the week of November 14. Loading of data and model programming will begin after delivery.

- c. Implement targeted monitoring to identify sources of specific toxic pollutants in stormwater and urban runoff in the Santa Monica Bay Drainage Basin. The initial source targeted may include municipal corporation facilities.

Status: The County Road Maintenance District No. 3 Yard has been selected for monitoring. This is a major County Yard performing vehicle maintenance and repair; equipment, vehicle, and materials storage, etc. We have selected sampling sites at the facility and are currently preparing the field sampling program, including constituents to be tested and sample collection procedures.

- d. Develop and begin implementation of a monitoring program to evaluate effectiveness of specific BMPs in the Santa Monica Bay Drainage Basin.

Status: A uniform data collection format has been drafted for the 13 baseline BMPs to collect information on BMP implementation for use in assessing BMP effectiveness. This format will be discussed with the Phase I Co-Permittees at the November 15, 1994 meeting. After receiving input from the Co-Permittees, the format will be finalized.

- e. Implement a monitoring program to identify locations of illegal practices, and to eliminate pollutant sources in the Santa Monica Bay Drainage Basin.

Status: Procedures for conducting storm drain inspections to identify illegal discharges/disposal practices have been developed. Inspections are targeted to begin the week of November 21.

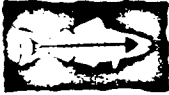
- f. Advertise a Request for Proposal to develop a program to evaluate stormwater impacts on selected receiving waters including conducting toxicity studies in the Santa Monica Bay Drainage Basin.

Status: A Scope of Work has been prepared for the hiring of a consultant to develop a program. Advertisement is anticipated for early December.

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Heal the Bay.

1640 FIFTH STREET, SUITE 204

SANTA MONICA, CA 90401

310-394-4552 (fax) 395-6878

November 1, 1994

Mr. Jim Noyes  
County of Los Angeles  
Department of Public Works  
P.O. Box 1460  
Alhambra, CA 91802

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DEPARTMENT OF PUBLIC WORKS  
WASTE MANAGEMENT DIVISION  
WATER QUALITY SECTION

Dear Mr. Noyes,

On behalf of Heal the Bay, a local environmental group with over 10,000 members working to make Santa Monica Bay safe and healthy again for people and marine life, we are commenting on the Los Angeles County Department of Public Works' Report of Waste Discharge (ROWD) as required under NPDES permit number CA 9061654. Stormwater pollution is the largest source of pollution to Southern California's nearshore waters. Reducing the pollutant loadings from the region's stormwater system and stormwater's impacts to coastal beneficial uses is Heal the Bay's highest organizational priority. Because of the length of the County's submission and the limited period of time available for public response, our comments were only on the Santa Monica Bay watershed stormwater program and our comments were not as thorough as we would have liked on Volumes 2, 3 and 8 of the ROWD.

The three most important components of an effective stormwater management program are:

- 1) a wide ranging and effective public education program that includes in-school education, a general multi-media public education program, and a targeted education program for the Clean Water Act regulated community and various commercial uses (restaurants, gas stations, etc.);
- 2) a comprehensive stormwater pollution reduction ordinance that includes good housekeeping, construction, post-construction, parking lots, and industrial requirements; and
- 3) a comprehensive inspection program for illicit connections, illegal disposal, industrial stormwater pollution and construction site pollution.

Heal the Bay offers our expertise to the County and any cities within the County on developing public education programs and a single, comprehensive stormwater pollution reduction ordinance. Public education programs are how the region will achieve the

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needed changes in the waste disposal behavior of County residents. A comprehensive ordinance is how the region will ensure the implementation of both structural and non-structural BMPs today and in the future. The ordinance is the tool to change the way the region develops and redevelops the area in order to maximize green space and on-site stormwater management and minimize pollutant loads to the storm drain system.

**Monitoring** - One cannot tell how effective a stormwater management program is at reducing pollutant loads to receiving waters and reducing the impacts to beneficial uses without a comprehensive monitoring program. Volume 8 of the ROWD includes the County's monitoring program and, for the first time, a summary of their historic urban runoff monitoring program.

Heal the Bay's comments on Volume 8 of the ROWD are essentially limited to Section A and B. Our comments on Section C have been addressed based on the County's response to our prior comments on their proposed monitoring program and the County's September commitment to the Regional Water Board to improve (receiving water and beneficial use impacts) and implement their monitoring program by January, 1994. For years, Heal the Bay has pushed for implementation of a comprehensive monitoring program that will provide information on the pollutant loads to receiving waters from individual watersheds, subdrainages, and land-uses. An effective monitoring program also should provide information on the effectiveness of BMP implementation for a given land-use or within a sub-drainage. Without a useful database, determination of the effectiveness of municipal stormwater management programs is very difficult and discussions on the 1995 municipal stormwater permit will revolve around policy more than science. Unfortunately, based on our preliminary assessment of Section A and B, the County's database is insufficient for use in permit renewal discussions.

Sections A and B still have not been adequately proofread. They contain many spelling and grammatical errors. Far more importantly, the monitoring data was not adequately characterized or quantified in the document. Among the problems in the document were the following:

- 1) As pointed out in the text, the Method Detection Limits for many toxicants were often above Basin Plan and/or Ocean Plan objectives. With such high MDLs, the data for these constituents do not provide information on the potential impacts of the presence of these constituents in stormwater on beneficial uses.
- 2) The report should have included the mean yearly concentrations of the constituents to provide information on the concentrations of heavy metals, pesticides, and petroleum hydrocarbons (base-neutrals) in dry weather and wet weather flows.

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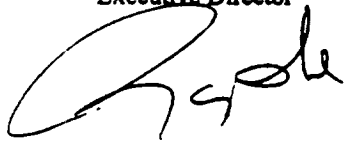


recommendations of the Malibu Creek Watershed Plan working group and the Santa Monica Bay Restoration Project. And finally, the plan should include implementation mechanisms (especially funding) and enforcement provisions to ensure that these large-scale efforts result in enhanced and/or preserved beneficial uses. These more detailed discussions will occur at the Regional Water Board, stormwater permit negotiations, and at the watershed planning groups. In light of all of the future opportunities for discussion, our comments on the proposed site-specific watershed plans were brief.

Sincerely,



Mark Gold  
Executive Director



Roger Gorke  
Science and Policy Analyst



Mark Abramson  
Storm Water Analyst

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600



October 31, 1994

Mr. Jim Noyes, Chief Deputy Director  
County of Los Angeles  
Department of Public Works  
900 South Fremont Avenue  
Alhambra, CA 91803-1331

**DRAFT REPORT OF WASTE DISCHARGE/STORM WATER MANAGEMENT  
PROGRAM PLANS (NPDES No. CA0061654, CI 6948)**

Thank you for the opportunity to review the draft document *NPDES PERMIT NO. CA 9061654, TASK 5.2, REPORT OF WASTE DISCHARGE (ROWD)*, received on October 18, 1994, with submittal of a revised Volume 8 on October 25, 1994. Staff have reviewed the eight-volumes of this document and are transmitting general comments on your approach to the permit renewal, with specific comments as Attachments 1-8. These comments should be addressed in the submittal of the final Storm Water Management Plans (ROWD), due to this Board by December 21, 1994.

**General**

This document will be submitted to satisfy the requirements of Task 5.2 of Board Order No. 90-079; however, it does not seem to satisfy these tasks under 5.2:

- 5.2.3 - Summary of procedures implemented to detect illegal discharges and illicit disposal practices and an evaluation of their effectiveness;
- 5.2.4 - Summary of measures implemented to control pollutants in surface runoff from construction sites and an evaluation of their effectiveness; and,
- 5.2.5 - Evaluation of the need for additional BMPs, source control, and/or structural control measures.

Regional Board Staff have frequently stressed the importance of providing as much detail as possible on how the County proposes to operate the municipal stormwater permit for the next five-year term of the permit. This involves providing details on what is currently being accomplished in each of the tasks of the Storm Water Management Plan Components, what is being proposed for the future, and the date that the full program will be implemented. The County has followed the outline of the Storm Water Management Plan Components; however, the documents lack the detail on what is currently under way and does not provide implementation dates. It proposes plans for developing future plans for program

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**ATTACHMENT 1**  
**COMMENTS ON REPORT OF WASTE DISCHARGE VOLUME 1**

1. The existing permit is CA0061654. Please change the document cover sheets to reflect the correct NPDES permit number.
2. Table A lists the proposed watersheds and which cities belong within a watershed. Some separations do not make sense on cursory review (e.g., El Monte and South El Monte in the Los Angeles River Watershed), and the rationale for their placement should be provided.
3. Section B-1, *BMP 1: Stencil Catch Basins*, states that there is no measure of program effectiveness for this management practice. Has an effort been made to compare pre-implementation catch basin trash amounts with those amounts found after the practice has been in place? If so, please include this information in the final report.
4. This Section also states that this type of program does not have directly measurable results. Los Angeles County Department of Public Works has a 319(h) grant for studying the effectiveness of this type of management practice, providing an indirect measurement of this management practice effectiveness. That should be stated, with an estimated completion date for this grant and submittal of the final report.
5. Section B-2, *BMP 2: Public Reporting Programs*, states that there are relatively few reportings, in part due to the lack of a tracking system. The final document should provide a schedule for implementation of a tracking system.
6. This Section also states that, based on the few reportings so far, this BMP is not very useful. The final document should summarize the number and types of reportings and the types of responses made. Hard data are necessary to evaluate this conclusion.
7. Section B-3, *BMP 3: Adopt Runoff Control Ordinance*, does not provide an analysis of the legal authority of the Principal- or Co-Permittees. This information should be provided in the final document. Additionally, there is no real evaluation of the effectiveness of this management practice. The final document should summarize where legal authority has been tested and whether it was found to be adequate.
8. Section B-4, *BMP 4: Develop Public Education and Outreach Programs*, does not provide an adequate evaluation of the management practice or its effectiveness. See comment #3 and #4.

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17. Section B-12. *BMP 12: Motivate Residents to Properly Dispose of Household Hazardous Waste*, does not adequately evaluate the effectiveness of this management practice. The final document should provide an analysis of which cities are measuring effectiveness and how, and an estimate of the type and quantity of material collected before vs. after program implementation.
18. In the final document, please provide a breakdown of which cities participate under area-wide collection of waste and which perform their own roundups. An estimate of program costs for this management practice should be included.
19. Section B-13. *BMP 13: Encourage Water Conservation*, does not adequately evaluate the effectiveness of this management practice. The final document should provide an analysis of the reduction in flow throughout the storm drain collection system, and an estimate of the impact of this management practice on the reduction.
20. This volume of the Report of Waste discharge should include a matrix of BMP implementation, by city, for those management practices other than the thirteen mandatory BMPs.

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enables the applicant at a minimum to:

- (A) Control through ordinance, permit, contract, order or similar means, the contribution of pollutants to the municipal storm sewer by storm water discharges associated with industrial activity and the quality of storm water discharged from sites of industrial activity;
- (B) Prohibit through ordinance, order or similar means, illicit discharges to the municipal separate storm sewer;
- (C) Control through ordinance, order or similar means the discharge to a municipal separate storm sewer of spills, dumping or disposal of materials other than storm water;
- (D) Control through interagency agreements among coapplicants the contribution of pollutants from one portion of the municipal system to another portion of the municipal system;
- (E) Require compliance with conditions in ordinances, permits, contracts or orders; and
- (F) Carry out all inspection, surveillance and monitoring procedures necessary to determine compliance and noncompliance with permit conditions including the prohibition on illicit discharges to the municipal separate storm sewer."

Additionally, 40 CFR 122.26(d)(2)(i)(D) requires the Permittees to "Control through interagency agreements among coapplicants the contribution of pollutants from one portion of the municipal system to another portion of the municipal system." This information is not provided, and there is no provision for future submittals of these items by the Permittees. Please provide this information in the final document. Under Institutional Arrangements in the submitted document, execution of the agreement by all Permittees is targeted for December 1995. These agreements must be in place before the permit renewal date.

5. Section II. describes the programs for detecting illicit discharges. 40 CFR 122.26(d)(2)(v)(B) requires that the Permittee provide a "description of the existing program to identify illicit connections to the municipal storm sewer system. The description should include inspection procedures and methods for detecting and preventing illicit discharges, and describe areas where this program has been implemented." A "concept" for this information is proposed for development by December 1995. A formal program to accomplish this task must be included in the final document, due to this Regional Board by December 21, 1994.

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for identification of pollutant sources for this watershed in the final report. 40 CFR 122.26(d)(2)(ii) requires "Source identification. The location of any major outfall that discharges to waters of the United States that was not reported under paragraph (d)(1)(iii)(B)(1) of this section. Provide an inventory, organized by watershed of the name and address, and a description (such as SIC codes) which best reflects the principal products or services provided by each facility which may discharge, to the municipal separate storm sewer, storm water associated with industrial activity." This was also a requirement of NPDES Permit No. CA0061654 (2.1.3), issued June 18, 1990, and should not be delayed to the end of 1996. This program should be part of this document, with results of the program to be submitted at a future date (date to be included in this document), if necessary.

12. The first paragraph of III.B., *Control Measures*, states that specific runoff control programs will be developed for this watershed in March of 1996. Existing control measures can be put in left in place at the start of the Permit, with "fine-tuning" for this watershed at a later date.
13. The first paragraph of III.C., *Outreach*, states that general outreach for all facilities will commence by March of 1996. 40 CFR 122.26(d)(2)(6) requires the submittal of "A description of educational activities, public information activities, and other appropriate activities to facilitate the proper management and disposal of used oil and toxic materials ..." General outreach is already being performed in some areas and should be listed as part of this Plan and be continued throughout the County. Specific outreach may be "fine-tuned" for this watershed at a later date.
14. Section VIII.A. states that the Permittees will develop standards to judge the effectiveness of program elements. This seems to have been started in the Monitoring Program Evaluation in Volume 8 of this submittal and should be summarized in this Section of the document. The submittal of the final document for this item should occur in Fiscal Year 1994-1995 in order to track the NPDES renewal cycle for this watershed.
15. There is no Page VIII-3 in the document submitted to this Regional Board. Also, there is no Section VIII.C..
16. Section VIII.B. apparently states that semi-annual report procedures will be developed in 1996 for this watershed. Semi-annual progress reports will start six months after the date of permit issuance.
17. Section VIII.D.3., *Record Keeping*, states that "records will be retained by

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**ATTACHMENT 3**  
**COMMENTS ON REPORT OF WASTE DISCHARGE VOLUME 3**

1. Section I. of the Santa Monica Bay (Ballona Creek portion) Watershed Management Plan, *Program Management*, describes the responsibilities of the Principal Permittee and the Co-permittees. The Principal Permittee is responsible for implementation of the monitoring program; however, responsibility for the evaluation of the monitoring data, especially for management practice effectiveness, is not specified. Additionally, there is no mechanisms to determine adequacy of the Permittee submittal. Please provide an auditing mechanism for program elements in the final document.
2. Section I. describes the responsibilities of the various committees. It does not describe the decision-making processes of the committees and how the products of their meetings will be incorporated into the programs of all the co-permittees (i.e., point number I.a.(1) of our Storm Water Management Plan Components: *Describe what the authority of the committee will be and how it will perform the tasks required of the responsible agency* is not addressed).
3. Information is also not provided in this Section on how the monetary responsibilities will be established. How will the Principal Permittee fund its responsibilities and how will the Co-permittees fund theirs? Who will be liable for penalties assessed for program non-compliance? The *Fiscal Resources* portion of this Section only describes future submittals of budget information for the Watershed Management Plan. 40 CFR 122.26(d)(1)(vi) states that the permittees must provide "A description of the financial resources currently available to the municipality to complete part 2 of the permit application. A description of the municipality's budget for existing storm water programs, including an overview of the municipality's financial resources and budget, including overall indebtedness and assets, and sources of funds for storm water programs." In 40 CFR 122.26(d)(2)(vi), there are additional requirements for the Permittee to provide fiscal analysis. "For each fiscal year to be covered by the permit, a fiscal analysis of the necessary capital and operation and maintenance expenditures necessary to accomplish the activities of the programs under paragraphs (d)(2) (iii) and (iv) of this section. Such analysis shall include a description of the source of funds that are proposed to meet the necessary expenditures, including legal restrictions on the use of such funds." Please include this information in the final document.
4. Under 40 CFR 122.26(d)(2)(i), the Permittee must provide a "demonstration that the applicant can operate pursuant to legal authority

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established by statute, ordinance or series of contracts which authorizes or enables the applicant at a minimum to:

- (A) Control through ordinance, permit, contract, order or similar means, the contribution of pollutants to the municipal sewer by storm water discharges associated with industrial activity and the quality of storm water discharged from sites of industrial activity;
- (B) Prohibit through ordinance, order or similar means, illicit discharges to the municipal separate storm sewer;
- (C) Control through ordinance, order or similar means the discharge to a municipal separate storm sewer of spills, dumping or disposal of materials other than storm water;
- (D) Control through interagency agreements among coapplicants the contribution of pollutants from one portion of the municipal system to another portion of the municipal system;
- (E) Require compliance with conditions in ordinances, permits, contracts or orders; and
- (F) Carry out all inspection, surveillance and monitoring procedures necessary to determine compliance and noncompliance with permit conditions including the prohibition on illicit discharges to the municipal separate storm sewer."

Additionally, 40 CFR 122.26(d)(2)(i)(D) requires the Permittees to "Control through interagency agreements among coapplicants the contribution of pollutants from one portion of the municipal system to another portion of the municipal system." This information is not provided, and there is no provision for future submittals of these items by the Permittees. Please provide this information in the final document. Under Institutional Arrangements in the submitted document, execution of the agreement by all Permittees is targeted for December 1995. These agreements should be in place before the permit renewal date.

- 5. Section II. describes the programs for detecting illicit discharges. 40 CFR 122.26(d)(2)(v)(B) requires that the Permittee provide a "description of the existing program to identify illicit connections to the municipal storm sewer system. The description should include inspection procedures and methods for detecting and preventing illicit discharges, and describe areas where this program has been implemented." A "concept" for this information is proposed for development by December 1995. A formal program to accomplish this task must be included in the final document,



























enables the applicant at a minimum to:

- (A) Control through ordinance, permit, contract, order or similar means, the contribution of pollutants to the municipal storm sewer by storm water discharges associated with industrial activity and the quality of storm water discharged from sites of industrial activity;
- (B) Prohibit through ordinance, order or similar means, illicit discharges to the municipal separate storm sewer;
- (C) Control through ordinance, order or similar means the discharge to a municipal separate storm sewer of spills, dumping or disposal of materials other than storm water;
- (D) Control through interagency agreements among coapplicants the contribution of pollutants from one portion of the municipal system to another portion of the municipal system;
- (E) Require compliance with conditions in ordinances, permits, contracts or orders; and
- (F) Carry out all inspection, surveillance and monitoring procedures necessary to determine compliance and noncompliance with permit conditions including the prohibition on illicit discharges to the municipal separate storm sewer."

Additionally, 40 CFR 122.26(d)(2)(i)(D) requires the Permittees to " Control through interagency agreements among coapplicants the contribution of pollutants from one portion of the municipal system to another portion of the municipal system." This information is not provided, and there is no provision for future submittals of these items by the Permittees. Please provide this information in the final document. Under Institutional Arrangements in the submitted document, execution of the agreement by all Permittees is targeted for December 1995. These agreements should be in place before the permit renewal date.

- 5. Section II. describes the programs for detecting illicit discharges. 40 CFR 122.26(d)(2)(v)(B) requires that the Permittee provide a "description of the existing program to identify illicit connections to the municipal storm sewer system. The description should include inspection procedures and methods for detecting and preventing illicit discharges, and describe areas where this program has been implemented." A "concept" for this information is proposed for development by December 1996. This facet of the County's program is too important to be delayed two years.

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**ATTACHMENT 8**  
**COMMENTS ON REPORT OF WASTE DISCHARGE VOLUME 8**

1. Item number 5. of Section 1.1, *Project Outline*, lists the report task of a screening analysis to flag non-compliance with water quality objectives specified by the "Basin Plan" and "Ocean Plan". The Outline does not state, however, that these constituents were then used for the spatial and trend analysis for the County and its watersheds. Further, these constituents were the only ones used in the assessment of urban impacts and the evaluation of BMP effectiveness. The final document must contain the analysis of relevant parameters (see list, page 4 of Volume 8) for the evaluation of runoff from the various land uses and for the evaluation of BMP effectiveness.
2. The Outline also states that Volume II of this report will be presented separately. Regional Board staff have not received this submittal, but will provide comments following receipt and review.
3. Paragraph three of Section 2.1, NPDES Permit, states that "The RWQCB, Los Angeles Region (4) Board oversees enforcement of the NPDES permit in the Los Angeles County area." It would be more accurate to say that this Regional Board oversees implementation of the permit.
4. Paragraph five of this Section states that "According to the permit, quality of the constituents of concern and significance in Los Angeles County are ..." Please delete the words "quality of " in the final document.
5. Paragraph four of Section 3.1 of the document states that "storm weather DO data from 1980 to 1988 was added to the data and reviewed in this report." This review was missing from the Regional Board's copy of Volume 8.
6. Turbidity is characterized on Page 13 of the document, and is described as being a direct measure of suspended solids. It may be an indirect measurement, and the statement should be modified to reflect that.
7. Appendix A provides the Monitoring Station Trend Analysis; however, in many of the graphics it is difficult to differentiate between the objective being compared and the average.
8. Additionally, the Basin Plan Objective for some of these analyses should be proofed against the Basin Plan tables (e.g., TDS is graphed as 800 mg/L for the Ballona Creek stations, but the Basin Plan has no TDS objective for

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Ballona Creek).

9. This Volume is an excellent start to the County's program of data reduction and analysis. The use of these tools for monitoring data collected in the program's future, and the Permittee responsibility for analysis of data, should be included in the final document.

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Dr. Robert P. Ghirelli  
October 13, 1994  
Page 2

Best Management Practices Evaluation -  
Tasks 5.2.2, 5.2.3, 5.2.4, and 5.2.5

Under the direction provided by this Department, a Stormwater/Urban Runoff Quality Management Program Questionnaire prepared by the Los Angeles County Department of Regional Planning was sent to all the Permittees. The intent of the Questionnaire was to assess the status and the level of implementation of all BMPs, and discuss program effectiveness and possible program modifications.

With the exception of the City of Bradbury, all cities answered and returned the Questionnaire to the Department of Regional Planning.

The Department of Regional Planning has prepared a report, based on the Questionnaires returned, to summarize the status of all BMPs by jurisdiction as well as to assess the level of implementation for the 13 baseline BMPs. Based on the findings, the Department of Regional Planning is preparing a report on the overall level of implementation, degree of effectiveness, and suggested modifications for all BMPs. Descriptions of the supplemental BMPs suggested or being implemented by the cities will also be included in the report. The final draft of the report will be distributed to all Permittees at a Joint Permittee meeting on October 17, 1994.

Basinwide Watershed Management Plan - Task 5.2.6

The Department, in collaboration with the Department of Regional Planning and City of Los Angeles, is preparing the Basinwide Stormwater Management Plan on behalf of all the Permittees. The first draft will be distributed to all the Co-Permittees at a joint Co-Permittee meeting to be held on October 17, 1994, at 9:00 a.m., at the Department of Public Works' Headquarters in Alhambra. The report will also be provided to various environmental groups.

Status Summary

Phase I (Year Five Activities):  
Santa Monica Bay Drainage Basin

The primary tasks for Phase I Permittees are to continue to implement Permit compliance activities and to report on their progress. This Department continues to organize and chair the monthly Co-Permittee meetings to coordinate Permit compliance. Enclosed is a chart summarizing the attendance record of the Co-Permittees (Attachment A).

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ATTACHMENT A

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# MONTHLY PERMITTEE MEETING ATTENDANCE

Phase I Cities

City	San Diego	Escondido	San Marcos	Colton	Corona	Imperial	Imperial Beach	Indio	Los Angeles	Malibu	Marina del Rey
April 19, 1993											
May 18, 1993											
June 21, 1993											
July 21, 1993											
August 16, 1993											
September 20, 1993											
October 20, 1993											
November 17, 1993											
January 19, 1994											
February 2, 1994											
February 16, 1994											
March 15, 1994											
April 19, 1994											
May 17, 1994											
June 21, 1994											
July 19, 1994											
August 16, 1994											
September 20, 1994											
<b>TOTAL</b>	21	18	19	12	23	23	18	21	26	18	17

City	San Diego	Escondido	San Marcos	Rolling Hills	Rolling Hills East	Santa Monica	Thousand Oaks	Formosa	West Hollywood	Westlake Village	Ventura Co.
April 19, 1993											
May 18, 1993											
June 21, 1993											
July 21, 1993											
August 16, 1993											
September 20, 1993											
October 20, 1993											
November 17, 1993											
January 19, 1994											
February 2, 1994											
February 16, 1994											
March 15, 1994											
April 19, 1994											
May 17, 1994											
June 21, 1994											
July 19, 1994											
August 16, 1994											
September 20, 1994											
<b>TOTAL</b>	15	15	10	11	4	23	18	22	19	19	17

SEMA PHASE I ATTENDANCE

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES

as of: September 27, 1994

Dead- lines	Activities	Athens	Arcata	Azusa	Baldwin Park	Bradbury	Burbank	Calabasas	Caltrans	Claremont	Covina	Diamond Bar	Duarte	El Monte
Sept 30 1992	Submital of Existing Rainfall Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/08/92	NA	10/14/92	07/14/92	10/01/92	09/18/92	09/15/92	10/07/92
	Submital of Existing Flow Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/08/92	NA	10/14/92	07/14/92	10/01/92	09/18/92	09/15/92	10/07/92
	Submital of Existing Water Quality Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	12/02/92	NA	10/14/92	07/14/92	10/01/92	09/18/92	09/15/92	10/07/92
	Alignment of Stormdrain	10/30/92	11/02/92	10/29/92	09/27/92	11/01/92	04/07/93	NA	09/24/93	07/14/92	10/28/92	10/28/92	10/29/92	10/28/92
	Identification of Natural Drainage Watercourses	10/30/92	11/02/92	10/29/92	09/16/92	11/03/92	05/05/93	NA		10/29/92	10/27/92	11/02/92	11/02/92	10/28/92
Oct 30 1992	Identification of Private Drainage Systems	10/30/92	11/02/92	10/29/92	09/27/92	11/01/92	04/07/93	NA	09/24/93	07/14/92	10/28/92	10/28/92	11/04/92	10/28/92
	Definition of Drainage Boundaries	10/30/92	11/02/92	10/29/92	09/27/92	11/01/92	04/07/93	NA	09/24/93	10/28/92	10/28/92	10/28/92	11/03/92	10/28/92
	Determination of Existing BMPs for Construction Sites	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA	12/01/93	09/02/92	11/30/92	12/01/92	11/18/92	11/30/92
	Existing BMPs for Illegal Discharge & Disposal Practices	12/01/92	12/01/92	11/30/92	12/02/92	12/01/92	05/05/94	NA	12/01/93	09/02/92	11/30/92	12/01/92	11/18/92	12/01/92
	Existing BMPs for Residential, Commercial, & Industrial	12/01/92	12/01/92	11/30/92	12/02/92	12/01/92	05/05/94	NA	12/01/93	09/02/92	11/30/92	12/01/92	11/18/92	11/30/92
Feb 1 1993	Identification of Waste Disposal Facilities	02/01/93	01/28/93	02/03/93	09/27/92	11/02/92	06/04/93	NA	10/14/92	07/14/92	01/28/93	01/18/93	09/17/92	01/25/93
Mar 1 1993	Identification of Industries by SIC Code	02/17/93	11/02/92	11/30/92	02/17/93	11/03/93	10/04/93	NA	NA	02/08/93	03/04/93	03/28/93	03/11/93	03/22/93
Apr 1 1993	Development of Early Action BMP Plan	03/31/93	04/01/93	04/01/93	02/23/93	04/01/93		NA	09/21/94 **	03/24/93	03/24/93	03/28/93	03/31/93	03/22/93
Apr 18 1993	Submital of Signature Block	04/22/93	04/22/93	04/22/93	04/12/93	04/28/93	04/28/93	NA	NA	04/20/93	04/18/93	04/15/93	04/22/93	04/14/93
May 13 1993	Required Legal Authority for Regulation of Stormwater/Urban Runoff	05/13/93	05/18/93	05/05/93	05/18/93		09/04/93	NA	09/29/94 **	09/01/93	09/11/93	05/11/93	09/18/93	05/04/93
	Stormwater Permit Implementation Agreement	05/17/93	05/25/93	05/13/93	09/24/93	09/02/93	09/22/93	NA	NA	09/01/93	09/11/93	05/08/93	09/18/93	05/17/93
		05/17/93	05/25/93	05/13/93	09/24/93	09/02/93	09/22/93	NA	NA	09/01/93	09/11/93	05/08/93	09/18/93	05/17/93

NA = Not applicable or agency approved by CRWQCB to be covered under other phases

\* = Pending CRWQCB approval to be covered under other phases  
\*\* = Late for countywide public review

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES

as of: September 27, 1994

Dead- lines	Activities	Glendale	Glendora	Hidden Hills	Industry	Inwindsle	La Canada Flintridge	La Habra Heights	La Puente	La Verne	Los Angeles	Monrovia	Montebello	Montney Park
Sept 30 1992	Submission of Existing	09/09/92	08/27/92	10/08/92	07/30/92	10/07/92	08/30/92	09/23/92	02/04/93	09/14/92	08/27/91	08/17/92	09/14/92	09/14/92
	Reinstall Data	09/14/92	09/02/92	10/04/92	08/06/92	10/07/92	08/30/92	09/24/92	02/08/93	09/14/92	10/05/92	08/20/92	09/14/92	09/14/92
	Submission of Existing	09/06/92	08/27/92	10/08/92	07/30/92	10/07/92	08/30/92	09/23/92	02/04/93	09/14/92	08/08/91	08/17/92	09/14/92	09/14/92
	Flow Data	09/14/92	09/02/92	10/08/92	08/06/92	10/07/92	08/30/92	09/24/92	02/08/93	09/14/92	10/05/92	08/20/92	09/14/92	09/14/92
	Submission of Existing Water Quality Data	09/09/92 09/14/92	08/27/92 09/02/92	10/08/92 10/08/92	07/30/92 08/06/92	10/07/92 10/07/92	08/30/92 09/30/92	09/23/92 09/24/92	02/04/93 02/08/93	09/14/92 09/14/92	10/05/92 10/05/92	08/20/92 08/20/92	09/17/92 09/17/92	09/14/92 09/14/92
Oct 30 1992	Alignment of Stormdrain	09/13/92 11/03/92	11/02/92 11/03/92	11/03/92 11/03/92	10/28/92 11/03/92	12/15/93 12/15/93	11/03/92 11/03/92	10/28/92 11/03/92	02/17/93 03/02/93	11/23/92 11/25/92	10/28/92 10/28/92	10/28/92 10/27/92	10/28/92 10/27/92	11/02/92 11/03/92
	Identification of Natural Drainage Watercourses	09/13/92 11/03/92	11/02/92 11/03/92	11/03/92 11/03/92	10/28/92 11/03/92	12/15/93 12/15/93	11/03/92 11/03/92	10/28/92 11/03/92	02/17/93 03/02/93	11/23/92 11/25/92	10/28/92 10/28/92	10/28/92 10/27/92	10/28/92 10/27/92	11/02/92 11/03/92
	Identification of Private Drainage Systems	09/13/92 11/03/92	11/02/92 11/04/92	11/03/92 11/03/92	11/25/92 11/25/92	12/15/93 12/15/93	12/03/92 11/03/92	10/28/92 11/03/92	02/17/93 03/02/93	11/23/92 11/25/92	10/28/92 10/28/92	10/28/92 10/27/92	11/04/92 11/04/92	11/02/92 11/04/92
	Definition of Drainage Boundaries	09/13/92 11/03/92	11/02/92 11/03/92	11/03/92 11/03/92	10/28/92 11/03/92		11/03/92 11/03/92	10/28/92 11/03/92	02/17/93 03/02/93	11/23/92 11/25/92	10/28/92 10/28/92	10/28/92 10/27/92	10/28/92 10/27/92	11/02/92 11/02/92
	Determination of Existing BMPs for Construction Sites	11/30/92 12/01/92	11/30/92 12/01/92	11/30/92 12/01/92	11/25/92 11/30/92	12/30/93 12/30/93	02/03/93 02/03/93	12/01/92 12/01/92	02/17/93 03/02/93	12/02/92 12/02/92	03/13/90 10/19/92	11/25/92 11/25/92	12/01/92 12/01/92	11/30/92 12/01/92
Nov 30 1992	Existing BMPs for Illegal Discharge & Disposal Practices	11/30/92 12/01/92	11/30/92 12/01/92	11/30/92 12/01/92	11/25/92 11/30/92	12/30/93 12/30/93	01/04/93 12/01/92	12/01/92 03/02/93	02/17/93 12/02/92	12/02/92 10/19/92	11/25/92 11/25/92	11/30/92 12/01/92	11/30/92 12/01/92	11/30/92 12/01/92
	Existing BMPs for Residential, Commercial, & Industrial	11/30/92 12/01/92	11/30/92 12/01/92	11/30/92 12/01/92	11/25/92 11/30/92	12/30/93 12/30/93	01/04/93 12/01/92	12/01/92 03/02/93	02/17/93 12/02/92	12/02/92 10/19/92	11/25/92 11/25/92	11/30/92 12/01/92	11/30/92 12/01/92	11/30/92 12/01/92
	Identification of Waste Disposal Facilities	02/18/93	01/25/93	11/03/92	01/18/93	05/25/94	02/03/93	08/23/92	02/04/93	12/07/92	07/30/92	02/02/93	01/27/93	02/18/93
Mar. 1 1993	Identification of Industries by SIC Code	02/03/93 12/14/93	01/25/93 01/27/93	05/11/93	02/22/93	03/02/93	02/03/93	12/02/92	02/04/93	03/08/93	12/08/92	10/28/92	01/27/93	03/08/93
	Development of Early Action BMP Plan	04/12/93 04/13/93	03/28/93 03/29/93	04/05/93	04/07/93		04/08/93	03/31/93	03/31/93	03/30/93	04/05/93	04/05/93	04/07/93	04/22/93
Apr. 19 1993	Submission of Signature Block	04/22/93 04/22/93	04/22/93 04/22/93	04/28/93	04/28/93		04/28/93	04/12/93	04/12/93	04/20/93		04/22/93	04/19/93	04/22/93
	Required Legal Authority for Regulation of Stormwater/Urban Runoff		07/12/93 07/13/93	05/18/93	05/12/93		08/23/93	04/28/93	04/28/93	05/24/93	10/19/92		07/08/93	05/17/93
May 13 1993	Stormwater Permit Implementation Agreement	05/05/93 05/05/93	05/13/93 05/13/93	05/24/93	05/18/93	08/07/93	08/23/93	05/18/93	08/02/93	05/18/93		08/04/93	05/25/93	11/04/93

NA = Not applicable or a agency approved by CRWQCB  
to be covered under other phases

\* = Pending CRWQCB approval to be covered under other phases  
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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES

as of: September 27, 1994

Dead- lines	Activities	Pasadena	Pomona	Rosemead	San Dimas	San Fernando	San Gabriel	San Marino	Glenn Medra	South El Monte	South Pasadena	Temple City	Walnut	West Covina
Sept 30 1992	Submission of Existing Rainfall Data	09/21/92	10/06/92	09/22/92	09/08/92	10/01/92	09/29/92	10/07/92	10/13/92	09/12/92	10/20/92	09/29/92	09/30/92	09/15/92
	Submission of Existing Flow Data	09/21/92	10/06/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	10/13/92	09/12/92	10/20/92	09/29/92	09/30/92	09/15/92
	Submission of Existing Water Quality Data	09/21/92	10/06/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	11/24/92	09/12/92	10/20/92	09/29/92	09/30/92	09/15/92
		09/21/92	10/06/92	09/22/92	09/14/92	10/05/92	09/29/92	10/07/92	11/25/92	09/20/92	10/20/92	10/04/92	09/30/92	09/17/92
Oct 30 1992	Alignment of Storm drain	11/03/92	11/16/92	11/02/92	11/25/92	07/29/92	10/26/92		12/01/92	10/19/92	11/12/92	10/29/92	11/01/92	07/28/92
	Identification of Natural Drainage Watercourses	11/03/92	11/16/92	11/02/92	11/25/92	07/29/92	10/26/92		12/01/92	10/26/92	11/18/92	11/02/92	11/02/92	10/06/92
	Identification of Private Drainage Systems	11/03/92	11/16/92	11/02/92	11/25/92	07/29/92	11/24/92		12/01/92		11/12/92	11/04/92	11/01/92	03/03/93
	Definition of Drainage Boundaries	11/03/92	11/16/92	11/02/92	11/25/92	09/15/92	11/24/92		12/01/92		11/18/92	11/04/92	11/02/92	03/29/93
		11/03/92	11/16/92	11/02/92	11/25/92	10/20/92	12/03/92		04/07/93	10/19/92	11/12/92	11/18/92	11/25/92	07/28/92
	11/03/92	11/16/92	11/02/92	11/25/92	11/03/92	12/03/92		04/12/93	10/20/92	11/18/92	11/17/92	11/25/92	10/09/92	
Nov 30 1992	Determination of Existing BMPs for Construction Sites	12/02/92	12/02/92	11/30/92	09/00/92	11/24/92	11/30/92	12/02/93	11/24/92	11/30/92		11/18/92	11/30/92	01/05/93
	Existing BMPs for Illegal Discharge & Disposal Practices	12/02/92	12/02/92	12/01/92	09/14/92	11/24/92	12/01/92	12/02/93	11/24/92	12/01/92		11/17/92	11/30/92	01/05/93
	Existing BMPs for Residential, Commercial & Industrial	12/02/92	12/02/92	12/01/92	09/14/92	11/24/92	12/01/92	12/02/93	11/25/92	12/01/92		11/17/92	11/30/92	01/05/93
		12/02/92	12/02/92	12/01/92	09/14/92	11/24/92	12/01/92	12/02/93	11/25/92	12/01/92		11/17/92	11/30/92	01/05/93
Feb 1 1993	Identification of Waste Disposal Facilities	09/21/92	02/03/93	02/03/93	09/09/92	10/01/92	01/20/93	12/02/93	11/24/92	05/19/94	09/04/93	10/30/92	11/30/92	09/15/92
		02/06/93	02/24/93	03/02/93	10/14/93	10/19/92	01/20/93	12/02/93	11/25/92	05/19/94		11/02/92	11/30/92	02/04/93
Mar 1 1993	Identification of Industries by SIC Code	03/06/93	04/15/93	02/06/93	03/04/93	01/19/93	02/17/93	12/02/93			09/04/93	11/18/92	12/02/92	03/06/93
		03/09/93	04/15/93	02/06/93	03/06/93	01/19/93	02/17/93	12/02/93			09/05/93	11/18/92	12/03/92	03/06/93
Apr 1 1993	Development of Early Action BMP Plan	03/23/93	04/12/93	04/05/93	04/12/93	04/01/93	03/31/93	12/10/93	04/06/93	04/01/93			03/31/93	03/29/93
		04/07/93	04/12/93	04/05/93	04/12/93	04/01/93	03/31/93	12/10/93	04/06/93	04/01/93			04/31/93	04/01/93
Apr 19 1993	Submission of Signature Block	04/12/93	04/22/93	04/12/93	04/21/93	04/15/93	04/21/93	04/26/93	04/26/93	04/26/93		04/26/93	04/12/93	04/12/93
		04/12/93	04/22/93	04/12/93	04/21/93	04/15/93	04/21/93	04/26/93	04/26/93	04/22/93		04/26/93	04/12/93	04/12/93
May 13 1993	Required Legal Authority for Regulation of Stormwater/Urban Runoff	05/13/93	09/02/93	05/11/93		09/06/93	05/12/93	12/10/93					04/26/93	05/17/93
	Stormwater Permit Implementation Agreement	05/17/93	09/08/93	05/11/93		09/06/93	05/17/93	12/10/93					04/26/93	05/17/93
		09/17/93	09/02/93	09/30/93	05/25/93	12/07/93	05/12/93	05/18/93	09/24/93	09/08/93	10/05/93	11/29/93	09/20/93	09/21/93
	09/17/93	09/08/93	09/30/93	05/25/93	12/07/93	05/12/93	05/18/93	09/24/93	09/08/93	10/05/93	11/29/93	09/20/93	09/21/93	

NA = Not applicable or agency approved by CRWCCB to be covered under other phases

\* = Pending CRWCCB approval to be covered under other phases  
 \*\* = Late for countywide public review

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R0032850

LTA:VM/PHASEII

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**STATUS OF YEAR 2 ACTIVITIES FOR PHASE II AGENCIES**

as of: September 27, 1994

Dead-Line	Activities	Pasadena	Pomona	Rosemead	San Dimas	San Fernando	San Gabriel	San Marcos	Sierra Madre	South El Monte	South Pasadena	Tempe City	Walnut	West Covina
Jul 1 1993	Identification of Marshals	02/02/94	07/22/93	11/02/92		07/01/93		04/28/94					06/21/93	06/21/93
	Catch Basin & Stationing Info	06/22/94		11/03/92		04/17/93		07/23/94					06/24/93	06/21/93
	Database (3 1/2 Disk) of Size & Type of Each Drain	02/02/94	07/22/93	06/02/93	06/13/94	07/01/93		07/12/94					06/30/93	
Jul 1 1994	Schedule for Database (3 1/2 Disk) of Connection Inventory	06/26/94	07/22/93	06/02/93	06/13/94	07/01/93							06/30/93	
	24-Hour Spill Response Telephone Number	11/06/93	12/02/93	06/26/93	10/14/93	10/12/93	02/01/94	11/16/93	01/13/94	11/16/93	02/02/94	03/08/94	11/17/93	11/06/93
Apr 13 1994	Plan for Addition of BMPs for Resi- dential, Commercial, & Industrial	04/13/94		04/06/94	06/28/94 **	06/11/94 **		04/13/94					04/14/94	04/21/94
	Plan for Additional BMPs for Illegal Discharges & Disposal Practices	04/13/94		04/06/94	06/28/94 **	06/11/94 **		04/13/94					04/14/94	04/21/94
	Plan for Addition of BMPs for Construction Sites	04/13/94		04/06/94	06/28/94 **	06/11/94 **		04/13/94					04/14/94	04/21/94
	Evidence of Progress of Imple- mentation of Early Action BMPs	04/13/94		04/06/94	06/28/94 **	06/11/94 **		04/13/94					04/14/94	04/21/94
May 31 1994	Evidence of All Legal Authority for Regulation of Stormwater Runoff	06/31/94		06/18/94	07/27/94 **	06/18/94		06/23/94					06/06/94	06/06/94

NA = Not applicable or agency approved by CRRWOC  
to be reviewed under other title no.

\* = Pending CRRWOC approval to be covered under other phases  
\*\* = Loss for complete publication

Due Reached  
Due Date not Applicable As To Form

LTAP/MSW/ES/94

R0032853

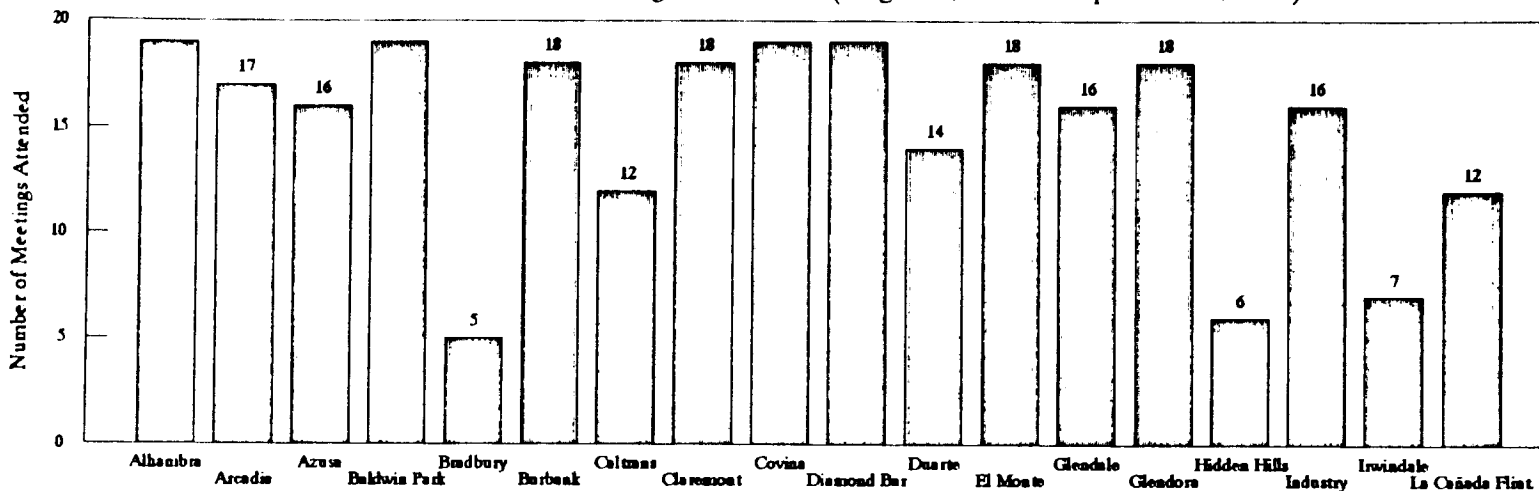
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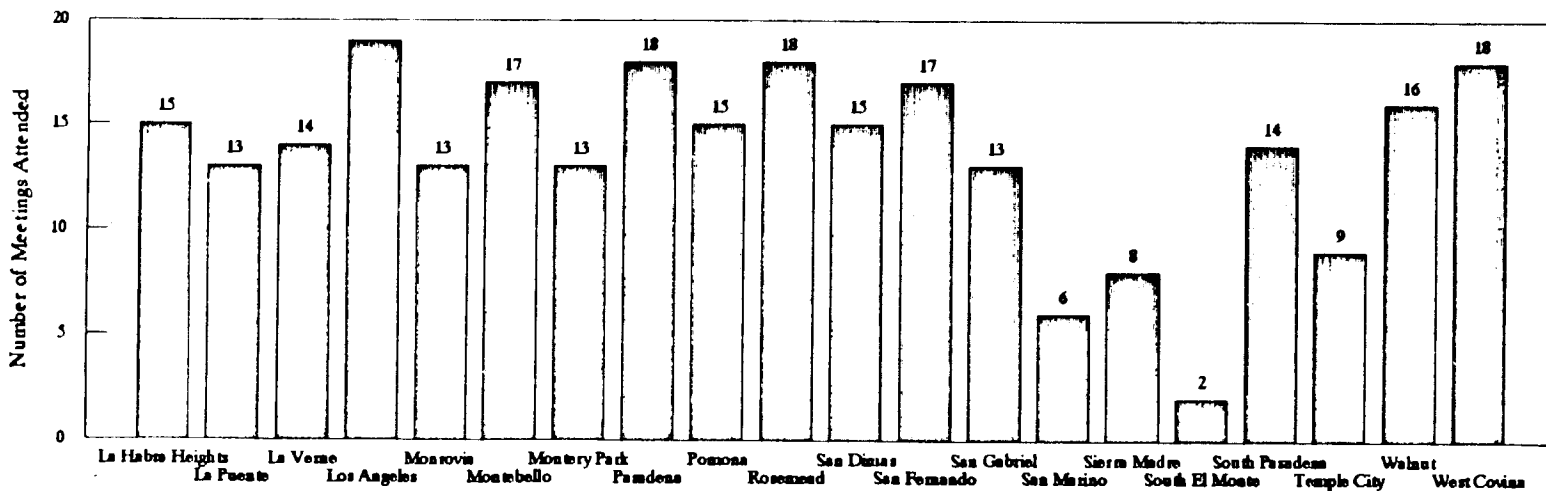


# Phase II Agencies PERMITTEE MEETING ATTENDANCE

Number of Meetings to Date: 19 (August 5, 1992 to September 7, 1994)



SEM/A-ATTENDIIA.CGM



SEM/A-ATTENDIIB.CGM

R0032855

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### STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES

as of September 27, 1984

Dead- line	Activities	AHamra	Arleta	Bell	Bell Gardens	Bellflower	Caltrans	Carson	Cerritos	Commerce	Compton	Cudahy	Downey	El Segundo	Gardena	Glendale	Hawthorn Gardens
	Letter of Intent	NA	08/18/83	08/24/83	08/23/83	08/21/83	NA	08/08/83	08/24/83	08/08/83	07/28/83	08/21/83	08/21/83	NA	08/05/83	NA	07/01/83
Sept 30 1983	Submission of Existing Rainfall Data	NA	03/07/84	08/31/83	08/21/83	08/03/83	08/22/83	08/31/83	08/22/83	03/08/84 **	02/28/84 **	08/25/83	08/25/83	*	08/28/83	NA	03/03/84
	Submission of Existing Flow Data	NA	03/07/84	08/31/83	08/21/83	08/03/83	08/22/83	08/31/83	08/22/83	03/08/84 **	02/28/84 **	08/25/83	08/25/83	*	08/28/83	NA	03/03/84
	Submission of Existing Water Quality Data	NA	03/22/84	08/31/83	08/21/83	08/03/83	08/22/83	08/31/83	08/22/83	04/18/84 **	08/08/84 **	08/25/83	08/25/83	*	08/28/83	NA	08/24/84 **
	24-Hour Spill Response	NA	10/25/83	08/07/83	08/07/83	08/27/83	08/30/83	08/27/83	10/04/83	11/08/83	11/08/83	08/18/83	11/17/83	*	11/08/83	NA	11/08/83
	Telephone Number	NA	10/25/83	08/07/83	08/07/83	08/27/83	08/30/83	08/27/83	10/04/83	11/08/83	11/08/83	08/18/83	11/17/83	*	11/08/83	NA	11/08/83
Oct 28 1983	Alignment of Stormdrain	NA	NA	10/28/83	10/27/83	08/27/83		10/20/83	11/08/83		10/07/83	10/28/83	10/27/83	*	10/07/83	NA	NA
	Identification of Natural Drainage Watercourses	NA	NA	10/28/83	10/27/83	08/27/83		10/20/83	11/08/83		10/07/83	10/28/83	10/27/83	*	10/07/83	NA	NA
	Identification of Private Drainage Systems	NA	NA	10/28/83	10/27/83	08/27/83		10/20/83	11/08/83		10/07/83	10/28/83	10/27/83	*	10/07/83	NA	NA
	Definition of Drainage Boundaries	NA	NA	10/28/83	10/27/83	08/27/83		10/20/83	11/08/83		10/07/83	10/28/83	10/27/83	*	10/07/83	NA	NA
	Alignment of Stormdrain	NA	NA	11/02/83	11/01/83	10/08/83		12/07/83	11/08/83			11/02/83	11/01/83	*	10/07/83	NA	NA
	Identification of Natural Drainage Watercourses	NA	NA	11/02/83	11/01/83	10/08/83		12/07/83	11/08/83			11/02/83	11/01/83	*	10/07/83	NA	NA
	Identification of Private Drainage Systems	NA	NA	11/02/83	11/01/83	10/08/83		12/07/83	11/08/83			11/02/83	11/01/83	*	10/07/83	NA	NA
Nov 30 1983	Determination of Existing BMPs for Construction Sites	NA	03/23/84	11/30/83	11/24/83	11/23/83	12/01/83	11/28/83	12/22/83	08/26/84	07/18/84 **	11/30/83	11/24/83	*	11/28/83	NA	
	Existing BMPs for Illegal Discharge & Disposal Practices	NA	03/23/84	11/30/83	11/24/83	11/23/83	12/01/83	11/28/83	12/22/83	08/26/84	07/18/84 **	11/30/83	11/24/83	*	11/28/83	NA	
	Existing BMPs for Residential Commercial & Industrial	NA	03/23/84	11/30/83	11/24/83	11/23/83	12/01/83	11/28/83	12/22/83	08/26/84	07/18/84 **	11/30/83	11/24/83	*	11/28/83	NA	
	Commercial & Industrial	NA	03/23/84	11/30/83	11/24/83	11/23/83	12/01/83	11/28/83	12/22/83	08/26/84	07/18/84 **	11/30/83	11/24/83	*	11/28/83	NA	
	Commercial & Industrial	NA	03/23/84	11/30/83	11/24/83	11/23/83	12/01/83	11/28/83	12/22/83	08/26/84	07/18/84 **	11/30/83	11/24/83	*	11/28/83	NA	
Feb 1 1984	Identification of Waste Disposal Facilities	NA	03/22/84	01/28/84	08/21/83	11/01/83	02/01/84	02/01/84	11/08/83	08/15/84	07/18/84 **	01/28/84	02/02/84	*	12/02/83	NA	
	Disposal Facilities	NA	03/22/84	01/28/84	12/05/83	11/01/83	02/01/84	02/01/84	11/08/83	08/15/84	07/18/84 **	01/28/84	02/02/84	*	12/02/83	NA	
Mar 1 1984	Identification of Industries by SIC Code	NA	03/22/84	02/23/84	12/20/83	02/02/84	05/17/84	02/18/84	02/02/84	07/18/84 **	02/23/84	02/23/84	*	12/08/83	NA		
	by SIC Code	NA	03/24/84	02/23/84	12/20/83	02/02/84	05/17/84	02/18/84	02/02/84	07/18/84 **	02/23/84	02/23/84	*	12/08/83	NA		
Mar 31 1984	Development of Early Action BMP Plan	NA		03/30/84	03/30/84	03/31/84	08/21/84 **	03/30/84	03/05/84 **		03/30/84	04/04/84	*	01/28/84	NA		
	Action BMP Plan	NA		03/31/84	03/30/84	04/04/84	08/21/84 **	03/30/84	03/05/84 **		03/31/84	04/04/84	*	01/28/84	NA		
May 12 1984	Required Legal Authority for Regulation of Stormwater/Urban Runoff	NA		04/28/84	01/20/84	03/03/84	08/28/84 **	05/12/84	08/08/84	08/28/84		04/28/84	08/31/84	*	03/31/84	NA	
	Stormwater Permit Implementation Agreement	NA		04/28/84	01/20/84	03/16/84	08/28/84 **	05/12/84	08/08/84	08/28/84		04/28/84	08/31/84	*	03/31/84	NA	
	Stormwater Permit Implementation Agreement	NA	08/10/84	08/12/84	11/08/83	08/02/84	04/28/84	08/12/84	08/18/84		08/28/84	08/12/84	04/04/84	NA	11/18/83	NA	08/18/84

NA = Not applicable or agency approved by CFWQCB to be covered under other phases

\* = Pending CFWQCB approval to be covered under other phases  
 \*\* = Late for countywide review

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 Date Determined Acceptable As to Form

R0032858

LTA VIMPHASE III

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES

as of September 27, 1994

Dead- lines	Activities	Hawthorne	Huntington Park	Inglewood	La Canada Flintridge	La Habra Hights	La Mirada	Lakewood	Lawndale	Lomita	Long Beach	Los Angeles	Lynwood	Maywood	Montebello	Norwalk	Palos Verdes Estates	
	Letter of Intent	02/03/93	02/01/93	NA	04/22/93	NA	07/21/93	08/30/93	08/21/93	08/14/93	08/10/93	NA	08/21/93	08/30/93	NA	08/24/93	NA	
Sept 30 1993	Submittal of Existing Rainfall Data	08/16/93	08/05/93	*	08/05/93	04/18/94	08/29/93	08/29/93	08/28/93	03/07/94 **	08/27/93	08/27/91	08/08/93	08/25/93	NA	08/13/93	NA	
	Submittal of Existing Flow Data	08/16/93	08/05/93	*	08/05/93	04/18/94	08/29/93	08/29/93	08/28/93	03/07/94 **	08/27/93	08/08/91	08/08/93	08/25/93	NA	08/13/93	NA	
	Submittal of Existing Water Quality Data	08/16/93	08/05/93	*	08/05/93	04/18/94	08/29/93	08/29/93	08/28/93	08/02/94 **	08/27/93	08/30/92	08/08/93	08/25/93	NA	08/13/93	NA	
	24-Hour Spill Response Telephone Number	01/26/94	10/05/93	*	10/14/93	01/12/94	01/12/94	11/10/93	10/24/93	02/10/94	08/27/93	07/07/93	11/18/93	08/18/93	NA	10/18/93	NA	
	Alignment of Storm drain	10/27/93	10/05/93	*	10/18/93	NA	10/27/93	10/27/93	10/28/93	NA	10/27/93	10/27/93	08/15/94	10/28/93	NA	10/27/93	NA	
Oct 14 1993	Identification of Natural Drainage Watercourses	11/01/93	08/05/93	*	10/18/93	NA	11/04/93	11/01/93	11/02/93	NA	10/27/93	11/01/93	08/15/94	11/02/93	NA	11/02/93	NA	
	Identification of Private Drainage Systems	10/27/93	08/05/93	*	10/18/93	NA	10/27/93	10/27/93	10/28/93	NA	10/27/93	10/27/93	08/15/94	10/28/93	NA	10/27/93	NA	
	Deletion of Drainage Boundaries	11/01/93	10/05/93	*	10/18/93	NA	10/27/93	10/27/93	10/28/93	NA	10/27/93	10/27/93	08/15/94	10/28/93	NA	10/27/93	NA	
	Determination of Existing BMPs for Construction Sites	11/30/93	11/30/93	*	11/23/93	NA	11/24/93	12/01/93	11/30/93	11/30/93	03/13/91	08/15/94	11/30/93	NA	11/23/93	NA	11/23/93	NA
	Existing BMPs for Illegal Discharge & Disposal Practices	11/30/93	11/30/93	*	11/23/93	NA	11/24/93	12/01/93	11/30/93	11/30/93	03/13/91	08/15/94	11/30/93	NA	11/23/93	NA	11/23/93	NA
Feb 1 1994	Commercial & Industrial Identification of Waste Disposal Facilities	01/26/94	01/10/94	*	12/07/93	NA	08/31/94	12/01/93	11/30/93	11/30/93	09/15/91	08/15/94	11/30/93	NA	11/23/93	NA	11/23/93	NA
	Identification of Industries by SIC Code	03/02/94	10/05/93	*	12/07/93	NA	02/23/94	11/10/93	03/02/94	10/27/93	10/08/92	08/08/93	02/23/94	NA	02/15/94	NA	02/15/94	NA
Mar 31 1994	Development of Early Action BMP Plan	04/04/94	03/17/94	*	02/02/94	NA	03/30/94	03/31/94	04/07/94	03/31/94	04/08/93	08/07/94 **	03/30/94	NA	03/31/94	NA	03/31/94	NA
	Required Legal Authority for Regulation of Stormwater Urban Runoff	05/24/94	05/02/94	*	04/27/94	NA	05/18/94	05/12/94	05/28/94	05/12/94	08/20/91	08/18/94	04/28/94	NA	08/08/94	NA	08/08/94	NA
May 12 1994	Stormwater Permit Implementation Agreement	05/24/94	02/24/94	NA	NA	NA	10/04/93	05/18/94	08/28/94	08/20/94	08/12/94	11/18/93	08/12/94	NA	11/08/93	NA	11/08/93	NA

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 \*\* = Use for countywide review

☐ Data Received  
 ☐ Data Determined Accessible As to Farm

LTA VMAPHASE III

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES

as of September 27, 1994

Dead-line	Activities	Paramount	Pasadena	Pico Rivera	Rancho Pablos Verde	Redondo Beach	Rolling Hills	Rolling Hills Est.	Santa Clarita	Santa Fe Springs	Signal Hill	South Gate	South Pasadena	Torrance	Vernon	Whittier
	Letter of Intent	06/06/93	NA	06/24/93	NA	NA	NA	NA	06/14/93	06/19/93	06/21/93	06/24/93	NA	NA	06/06/93	06/21/93
Sept 30 1993	Submission of Existing Rainfall Data	09/20/93	NA	09/07/93	NA	NA	NA	NA	09/27/93	09/21/93	09/31/93	09/16/93	NA	NA	09/21/93	09/08/93
	Submission of Existing Fibre Data	09/20/93	NA	09/07/93	NA	NA	NA	NA	09/27/93	09/21/93	09/31/93	09/23/93	NA	NA	09/21/93	09/08/93
	Submission of Existing Water Quality Data	09/20/93	NA	09/07/93	NA	NA	NA	NA	09/27/93	09/21/93	09/31/93	09/23/93	NA	NA	09/21/93	09/08/93
	24-Hour Spill Response Telephone Number	09/07/93	NA	10/28/93	05/27/93	03/07/94	NA	09/07/93	10/12/93	10/18/93	09/31/93	09/28/93	NA	09/09/93	10/28/93	09/08/93
Oct 28 1993	Alignment of Storm drain	10/27/93	NA	10/28/93	NA	NA	NA	NA	10/27/93	10/27/93	11/01/93	10/27/93	NA	11/03/93	10/28/93	10/27/93
	Identification of Natural Drainage Water course	11/01/93	NA	11/02/93	NA	NA	NA	NA	11/01/93	11/01/93	11/01/93	11/02/93	NA	11/03/93	11/02/93	11/01/93
	Identification of Private Drainage Systems	10/27/93	NA	10/28/93	NA	NA	NA	NA	10/27/93	10/27/93	11/01/93	10/27/93	NA	11/03/93	10/28/93	10/27/93
	Definition of Drainage Boundaries	11/01/93	NA	11/02/93	NA	NA	NA	NA	11/01/93	11/01/93	11/01/93	11/02/93	NA	11/03/93	11/02/93	11/01/93
	Determination of Existing BMPs for Construction Sites	11/24/93	NA	12/01/93	NA	NA	NA	NA	11/29/93	11/24/93	12/01/93	11/24/93	NA	NA	11/29/93	12/01/93
	Existing BMPs for Illegal Discharge & Deposal Practices	11/24/93	NA	12/01/93	NA	NA	NA	NA	11/29/93	11/24/93	12/01/93	11/24/93	NA	NA	11/29/93	12/01/93
Feb 1 1994	Identification of Waste Disposal Facilities	09/20/93	NA	09/07/93	NA	NA	NA	NA	10/14/93	01/31/94	01/25/94	01/31/94	NA	NA	02/01/94	02/02/94
	Identification of Industrial by SIC Code	12/20/93	NA	09/07/93	NA	NA	NA	NA	12/09/93	03/01/94	09/24/93	09/13/93	NA	NA	02/29/94	03/01/94
Mar 31 1994	Development of Early Action BMP Plan	03/30/94	NA	04/05/94	NA	NA	NA	NA	03/31/94	03/31/94	03/24/94	03/17/94	NA	NA	03/29/94	03/31/94
	Required Legal Authority for Regulation of Stormwater Urban Runoff	01/20/94	NA	09/07/93	NA	NA	NA	NA	03/18/94	05/12/94	04/28/94	11/15/93	NA	NA	05/11/94	05/12/94
May 12 1994	Stormwater Permit Implementation Agreement	02/08/94	NA	09/24/93	NA	NA	NA	NA	05/12/94	05/12/94	04/27/94	09/29/93	NA	NA	12/27/93	09/08/94
		02/08/94	NA	09/24/93	NA	NA	NA	NA	05/17/94	05/12/94	04/27/94	09/29/93	NA	NA	12/27/93	09/14/94

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 Date Determined Acceptable As to Farm

R0032860

LTA VMP PHASE III

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**STATUS OF YEAR 2 ACTIVITIES FOR PHASE III AGENCIES**  
as of September 27, 1994

Dead-Ends	Activities	Alhambra	Artesia	Bell	Bell Gardens	Bellflower	Calrose	Carson	Cerritos	Commerce	Compton	Cudahy	Downey	El Segundo	Gardena	Glendale
Jul 1 1994	Identification of Manholes	NA	NA	06/30/94	01/27/94	08/21/93	06/20/94	08/30/94	08/30/94			06/30/94	07/05/94	*	02/16/94	NA
	Catch Basin & Stationing Info	NA	NA	07/12/94	01/27/94	08/03/94			07/14/94			07/12/94	08/24/94	*	02/17/94	NA
	Database (3 1/2" Disk) of	NA	NA	06/30/94	01/20/94	07/27/94	08/20/94		06/30/94			06/30/94	07/05/94	*	02/16/94	NA
	Size & Type of Each Drain	NA	NA	07/12/94	01/27/94	08/11/94			07/14/94			07/12/94	08/24/94	*	02/17/94	NA
Jul 3 1995	Schedule for Database (3 1/2" Disk) of Connection Inventory	NA			01/20/94	08/03/94								*		NA
		NA			01/27/94	08/11/94								*		NA
Apr 15 1995	Plan for Additional BMPs for Residential Commercial & Industrial	NA												*	09/14/94	NA
	Plan for Additional BMPs for Illegal Discharges & Disposal Practices	NA												*	09/14/94	NA
	Plan for Additional BMPs for Construction Sites	NA												*	09/14/94	NA
	Evidence of Progress of Implementation of Early Action BMPs	NA												*	09/14/94	NA
May 31 1995	Evidence of All Legal Authority for Regulation of Stormwater/Runoff	NA				03/03/94	05/25/94						05/31/94	*		NA
		NA					05/25/94						05/31/94	*		NA

Dead-Ends	Activities	Inglewood	Hawthorne	Huntington Park	Inglewood	La Canada Flintridge	La Habra Heights	La Mesa	Lakewood	Lawndale	Lomita	Long Beach	Los Angeles	Lynwood	Maywood	Montebello
Jul 1 1994	Identification of Manholes	NA	07/08/94	04/18/94	*	10/18/93	NA				NA	08/22/94	NA	08/15/94	08/30/94	NA
	Catch Basin & Stationing Info	NA	07/08/94	06/15/94	*	04/27/94	NA				NA	08/22/94	NA	08/15/94	07/12/94	NA
	Database (3 1/2" Disk) of	NA	07/08/94	06/15/94	*	02/23/94	NA				NA	08/30/94	NA	08/15/94	08/30/94	NA
	Size & Type of Each Drain	NA	07/08/94	06/30/94	*	03/08/94	NA				NA	08/30/94	NA	08/15/94	07/12/94	NA
Jul 3 1995	Schedule for Database (3 1/2" Disk) of Connection Inventory			08/15/94	*	02/23/94	NA						NA			NA
				08/30/94	*	03/08/94	NA						NA			NA
Apr 15 1995	Plan for Additional BMPs for Residential Commercial & Industrial				*		NA						NA			NA
	Plan for Additional BMPs for Illegal Discharges & Disposal Practices				*		NA						NA			NA
	Plan for Additional BMPs for Construction Sites				*		NA						NA			NA
	Evidence of Progress of Implementation of Early Action BMPs				*		NA						NA			NA
May 31 1995	Evidence of All Legal Authority for Regulation of Stormwater/Runoff		05/24/94		*		NA						NA			NA
			05/24/94		*		NA						NA			NA

NA = Not applicable or agency approved by CPHOCC to be removed under other phase

\* = Pending CPHOCC approval to be removed under other phase  
\*\* = Late for completed public review

☐ Data Received  
☐ Data Distributed Acceptable As To Phase

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**STATUS OF YEAR 2 ACTIVITIES FOR PHASE III AGENCIES**

as of September 27, 1994

Date- Area	Activities	Norwalk	Palos Verdes Estates	Paramount	Pasadena	Pico Pikes	Rancho Palos Verdes	Redondo Beach	Rolling Hills	Rolling Hills Est	Santa Clara	Santa Fe Springs	Signal Hill	South Oaks	South Pasadena	Torrance	Vernon	Whittier
Jul 1 1994	Identification of Manhole	10/27/93	NA	1/01/93	NA		NA	NA	NA	NA		10/23/93	06/29/94	06/22/94	NA	NA	06/30/94	06/28/94
	Catch Basin & Scheduling Info	10/27/93	NA	01/27/94	NA		NA	NA	NA	NA		09/15/94	06/29/94	06/23/94	NA	NA	07/16/94	06/24/94
	Database (1 1/2 Disk) of Site & Type of Each Drm'n	06/30/94	NA	01/26/94	NA		NA	NA	NA	NA		09/30/94	06/29/94	06/22/94	NA	NA	09/30/94	09/29/94
Jul 2 1995	Schedule for Database (1 1/2 Disk) of Commercial Inventory	07/14/94	NA	01/27/94	NA		NA	NA	NA	NA		09/15/94	07/27/94	06/21/94	NA	NA	07/09/94	07/24/94
			NA	01/27/94	NA		NA	NA	NA	NA			07/27/94	06/22/94	NA	NA		
Apr 13 1995	Plan for Additional BMPs for Resi- dential Commercial & Industrial		NA		NA		NA	NA	NA	NA					NA	NA		
	Plan for Additional BMPs for Regal Discharges & Disposal Practices		NA		NA		NA	NA	NA	NA					NA	NA		
	Plan for Additional BMPs for Construction Sites		NA		NA		NA	NA	NA	NA					NA	NA		
	Evidence of Progress of Imple- mentation of Early Action BMPs		NA		NA		NA	NA	NA	NA					NA	NA		
May 31 1995	Evidence of All Legal Authority for Regulation of Stormwater Runoff		NA		NA		NA	NA	NA	NA				NA	NA			

NA - Not applicable or agency approved by CRRQCS  
to be covered under other phases

□ - Pending CRRQCS approval to be covered under other phases  
□ - Late for a court/other public review

□ Date Received  
□ Date Delivered/Approved As To Phase

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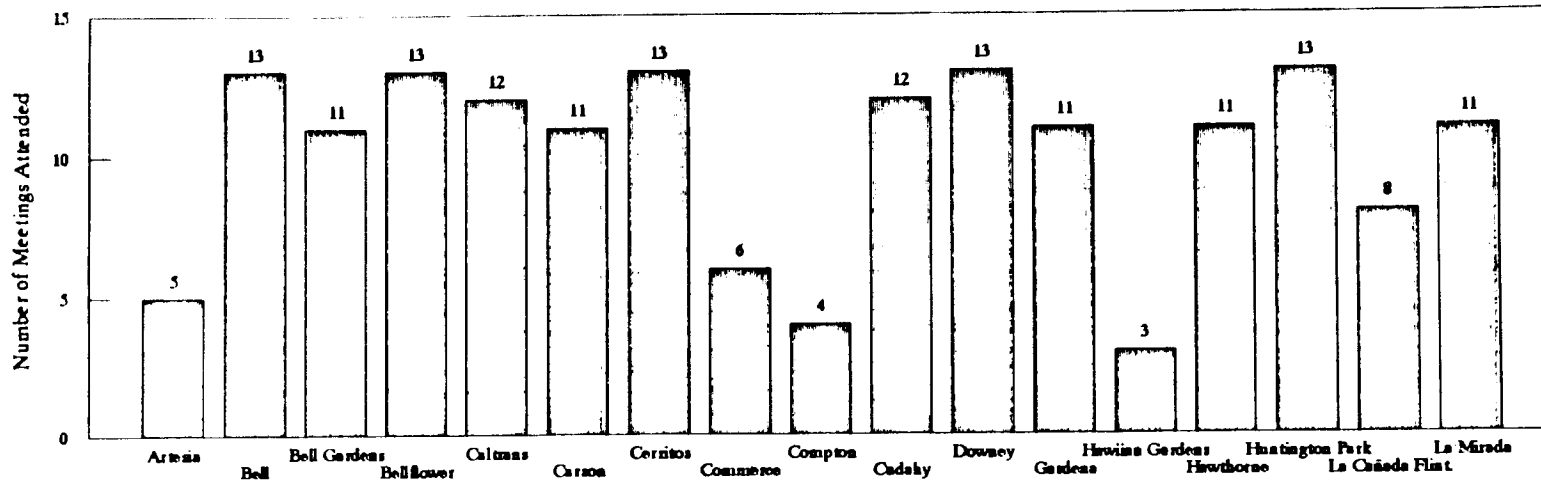
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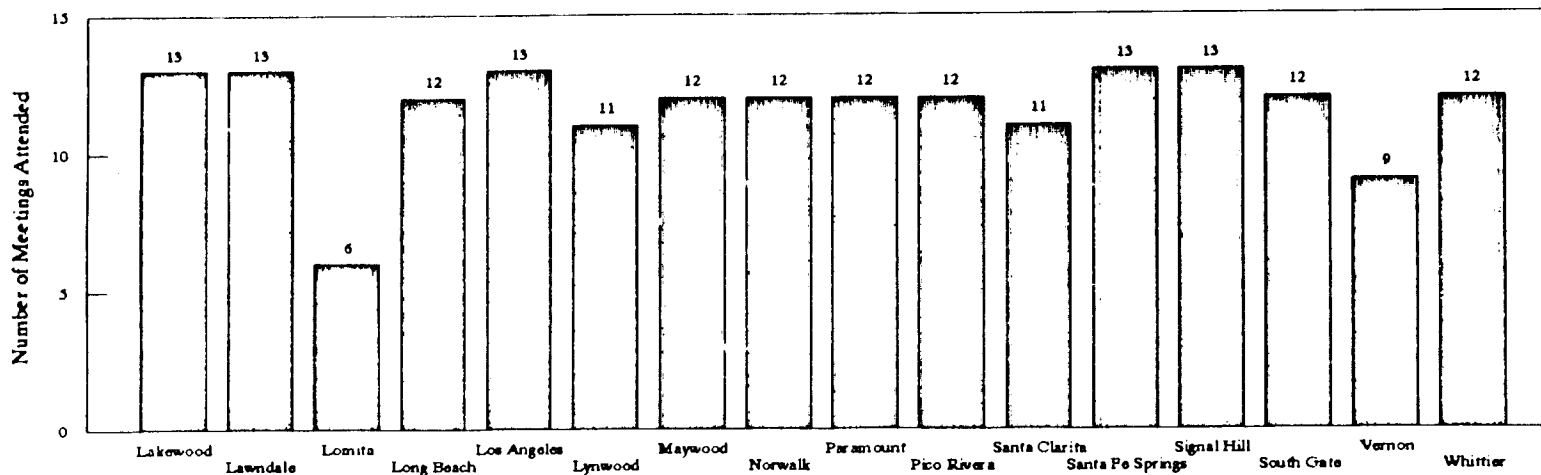
ATTACHMENT E

# Phase III Agencies MONTHLY PERMITTEE MEETING ATTENDANCE

Number of Meetings to Date: 13 (July 28, 1993 to August 24, 1994)



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SEMA:ATTNDIIB.CGM

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**MONTHLY PERMITTEE MEETING ATTENDANCE**  
Phase III Agencies

Meeting Date	Anaheim	Bell	Bell Gardens	Bellflower	Caltrans	Canon	Cerritos	Commerce	Compton	Cudahy	Daly	Oakdale	Hawthorne	Hawthorne	Huntington Park	La Canada Flin	La Habra
July 25, 1993		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
August 25, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
September 22, 1993		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
October 27, 1993		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
November 24, 1993		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
January 26, 1994		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
February 23, 1994		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
March 21, 1994		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
April 27, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
May 25, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
June 22, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
July 27, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
August 24, 1994		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
TOTAL	5	13	11	13	12	11	13	6	4	12	13	11	3	11	13	8	11

Meeting Date	Lakewood	Lakewood	Lowie	Long Beach	Los Angeles	Lynwood	Maywood	Norwalk	Pasadena	Pico Rivera	Santa Clara	Santa Fe Spring	Signal Hill	South Gate	Vermont	Whittier
July 25, 1993	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
August 25, 1993	1	1	1		1	1	1	1	1	1	1	1	1	1	1	1
September 22, 1993	1			1	1		1	1	1	1	1	1	1	1	1	1
October 27, 1993	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
November 24, 1993	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
January 26, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
February 23, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
March 21, 1994	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
April 27, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
May 25, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
June 22, 1994	1	1	1	1	1		1	1	1	1	1	1	1	1	1	1
July 27, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
August 24, 1994	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
TOTAL	13	13	6	12	13	11	12	12	12	12	11	13	13	12	9	12

MEM ATTENDANCE

The following are agencies in Phase I or Phase II which will not participate in Phase III because they have submitted a letter to the RWQCB indicating that all Phase III activities were covered under Phase I or Phase II:

- |                   |                            |                       |                     |               |
|-------------------|----------------------------|-----------------------|---------------------|---------------|
| El Segundo (I)    | Price Venetian Estates (I) | Alhambra (II)         | Montebello (II)     | Torrance (I)  |
| Inglewood (I)     | Rolling Hills (I)          | Glendale (II)         | Pasadena (II)       | Calabasas (I) |
| Redondo Beach (I) | Rolling Hills Estates (I)  | La Habra Heights (II) | South Pasadena (II) |               |

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HARRY W. STONE, Director

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (818) 458-5100

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE: WM-3

September 22, 1994

Dr. Robert P. Ghirelli
California Regional Water Quality
Control Board, Los Angeles Region
101 Centre Plaza Drive
Monterey Park, CA 91754-2156

Dear Dr. Ghirelli:

COUNTY OF LOS ANGELES
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
PERMIT NO. CA0061654, CI 6948, BOARD ORDER NO. 90-079

We appreciate meeting with you and your staff on September 19, 1994, to discuss our compliance with the NPDES Permit referenced above. This letter confirms our agreement with you and your staff regarding the actions described below:

Table with 2 columns: Action, Compliance Report Due. Contains 4 rows of action items with due dates of January 15, 1995.

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Dr. Robert P. Ghirelli  
September 22, 1994  
Page 2

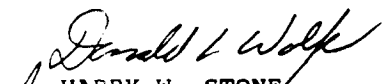
<u>Action (Cont'd)</u>	<u>Compliance Report Due</u>
e. Implement a Monitoring Program to identify locations of illegal practices, and to eliminate pollutant sources in the Santa Monica Bay Drainage Basin.	January 15, 1995
f. Advertise a Request for Proposal to develop a program to evaluate stormwater impacts on selected receiving waters including conducting toxicity studies in the Santa Monica Bay Drainage Basin.	January 15, 1995
g. Submit a revised Monitoring Program for Phases II and III that includes all program elements with timelines for development and implementation.	January 15, 1995

The County is committed to completing these actions within the agreed upon time frame. We will be submitting monthly progress reports to you by the 15th of each month beginning November 1994 through March 1995. We would also like to meet with your staff biweekly to review Monitoring Program progress.

We are pleased that we have now reached mutual agreement on the actions necessary to comply with the Permit and the applicable time frames. We would request that you direct your staff to monitor our progress, providing necessary clarifications and guidance to ensure that the Monitoring Program is carried out in a timely manner consistent with work logistics and in accordance with our mutual agreement.

If you have any questions regarding this matter, please contact Mr. James A. Noyes at (818) 458-4002.

Very truly yours,

  
HARRY W. STONE  
Director of Public Works

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91734-2156  
(213) 266-7500  
FAX: (213) 266-7600



13 September 1994

Mr. Jack Ainsworth  
California Coastal Commission  
89 South California Street  
2nd Floor  
Ventura, CA 93001-2801

**MONITORING REQUIREMENTS UNDER BOARD ORDER NO. 90-079  
INSTALLATION OF AN AUTOMATED WATER SAMPLER AT MALIBU CREEK  
(NPDES NO. CA0061654, CI FILE NO. 6948)**

The County of Los Angeles (County) has requested the Coastal Commission's approval for the installation of an automated water sampler in the Malibu Creek. This letter is in support of the issuance of an emergency permit to the County for such purpose.

In June 1990, this Regional Board issued Order No. 90-079 (NPDES NO. CA0061654, CI 6948), *WASTE DISCHARGE REQUIREMENTS STORMWATER/URBAN RUNOFF DISCHARGE for LOS ANGELES COUNTY and CO-PERMITTEES*. Los Angeles County Department of Public Works is the Principal Permittee under this permit, with the other 86 municipalities and Caltrans as Co-Permittees. The County is required to accomplish tasks designed to improve the water quality in receiving waters by controlling contamination from storm water runoff sources. The tasks include:

- 2.1 8 A workplan for the development of a stormwater/urban runoff monitoring program, for approval by the Executive Officer.
- 3.1 1 A monitoring program based on the approved workplan. This program shall be designed to:
  - o detect accurately the constituents and parameters of concern, in discharges indicated in the workplan, and to identify their possible sources.
  - o identify illegal dischargers and/or locations of illicit disposal practices.

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Mr. Jack Ainsworth  
Page 2

- 4.1.1 Evidence of satisfactory progress of implementation of plan and schedule for early action BMPs and additional BMPs.
- 4.1.2 Evidence of implementation and progress of procedures to detect and eliminate illegal discharges and eliminate illicit disposal practices.
- 4.1.3 Evidence of implementation and progress of measures to control pollutants in surface runoff from construction sites.

The monitoring program that was submitted by the County on behalf of all Co-Permittees, and approved by the Executive Officer, included a monitoring station in Malibu Creek designed to identify contaminants of concern for rural/residential areas. This monitoring station is representative for this type of land use throughout the county until other phases of the program are implemented. It is also necessary in the evaluation of program effectiveness under tasks 4.1.1 through 4.1.3. The information contained from the monitoring facilities are also used in the permit renewal process under Tasks:

- 5.2.1 Summary of the results of the monitoring program.
- 5.2.2 Summary of BMPs implemented and evaluations of their effectiveness.
- 5.2.3 Summary of procedures implemented to detect illegal discharges and illicit disposal practices and an evaluation of their effectiveness.
- 5.2.4 Summary of measures implemented to control pollutants in surface runoff from construction sites and an evaluation of their effectiveness.
- 5.2.5 Evaluation of the need for additional BMPs, source control, and/or structural control measures.
- 5.2.6 Proposed plan of stormwater/urban runoff quality management activities that will be undertaken during the term of the next permit.

The County is receiving a Cease and Desist Order from this Regional Board for lack of compliance in their monitoring program, and is also being sued by the Natural Resources Defense Council for, among other items, failure to implement their monitoring program. The County of Los Angeles has failed to sample as required for the past three rainy seasons. The rainy season spans the months of October through April and it is imperative that the County install the sampler prior to the rainy season so that the "first flush" of the season may be properly and adequately sampled and analyzed. However, the first rain of the season which

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HARRY W. STONE, Director

COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1231  
Telephone: (818) 458-5100

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE WM-3

September 13, 1994

Dr. Robert P. Ghirelli  
Executive Officer  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Dr. Ghirelli:

**MUNICIPAL STORMWATER PERMIT  
RESPONSE TO YOUR MAY 4, 1994 LETTER**

As you are aware, since receipt of your May 4, 1994 letter, we have been working with your staff to resolve technical issues necessary for us to address your comments and directives. This letter provides our response to your original letter.

Baseline Best Management Practices

1. You indicate that your State Water Resources Control Board Counsel is currently reviewing our existing legal Codes for adequacy. We are awaiting the results of this review.
2. With your staff's concurrence, we have developed for your use a report of the 5,000+ industries involved in the County's Industrial Waste Program (copy enclosed). A related description of the County use Codes is also enclosed. This database covers industries within the County unincorporated area and the 40 cities that contract with the County for industrial waste services. This list only contains industries that have an Industrial Waste Permit. This is the only database currently available to us that provides any of the information you requested.

As part of our Industrial Waste Program, each permitted industry is inspected at least once per year. This inspection includes a review of the facility to identify any inappropriate non-stormwater discharges and any potential stormwater contamination problems. In addition, our inspectors investigate numerous other illegal discharges that are either reported to us or observed by the inspectors while

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Dr. Robert P. Ghirelli  
September 14, 1994  
Page 2

out in the field. As part of our proposed budget for Fiscal Year 1994-95, we have requested two additional inspectors to allow us to expand our inspection program in the County unincorporated areas to include non-permitted industries and businesses.

In regard to the inspection of County storm drains for illegal discharges and illicit connections, our field staff routinely report any observed illegal discharges or dumpings to the appropriate authorities. In addition to responding to such incidents on a daily basis, our current storm drain inspection program is being revised to include expanded procedures for conducting illegal discharge investigations. These procedures include storm drain inspection guidelines, follow-up inspection criteria, and more detailed documentation procedures. The program is being expanded for implementation throughout our storm drainage system in the County.

#### Monitoring Work Plan

In your letter, you state that the data being compiled by the County to satisfy Permit Tasks 2.1.1, 2.1.3, and 2.1.4 must be incorporated into our proposed geographic information system (GIS) in an Arc/Info compatible format. All data collected to comply with these Permit tasks has been previously provided to you in hard copy form.

At present, we have developed some limited GIS applications using the System 9 GIS software for use in our drainage area mapping efforts. We have also developed a number of databases using dBase and Lotus software to compile tabular data. We have previously provided you with hard copy maps and reports from these sources. As a result of numerous discussions with your staff, we will provide you with all the tabular report data for Phases I and II on disks by September 15, 1994. We will also provide you with a disk containing the water quality data for our existing Countywide monitoring program for the period 1988-present. Data collected prior to 1988 is only available in hard copy form. Flow data is also presently only available in hard copy form. Digital data for drainage areas, city boundaries, and drainage basin boundaries will be provided in Arc/Info format for Santa Monica Bay by September 30, 1994. Phase II digital data will be provided by November 30, 1994. Drainage area collection point arrows will be supplied at a later date on a separate disk. Storm drain data for the County and Co-Permittees (excluding the City of Los Angeles) will be provided in graphics format only due to the fact that the data does not exist in Arc/Info format. Due to the size of the storm drain data base, we will first provide you by October 17,

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Dr. Robert P. Ghirelli  
September 13, 1994  
Page 3

1994, with a sample to load into your system to ensure proper compatibility. The remaining storm drain information will be released pending your successful loading of the sample information.

During meetings with Carlos Urrunaga, of your staff, he became aware of soil and isohyetal zone data we are compiling for our internal use which is not part of any Permit-required submittal. As a courtesy, we will provide you with a copy of this data.

The data is still being edited and is not ready for release. Upon completion, arrangements will be made with your staff for digital or graphical data release.

We are proceeding with the development of a GIS for the stormwater permit program. Included in this GIS will be the capability to exchange data in an Arc/Info compatible format.

If you have any questions regarding this matter, please contact Mr. Gary Hildebrand, of this office, at (818) 458-5948, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Director of Public Works

  
DAVID YAMAHARA  
Assistant Deputy Director  
Waste Management Division

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600



September 13, 1994

Harry Stone, Director,  
County of Los Angeles  
Department of Public Works  
900 South Fremont Avenue  
Alhambra, CA 91803-1331

CERTIFIED MAIL  
SIGNATURE REQUESTED  
CLAIM NO. P.997-019-790

**TENTATIVE CEASE AND DESIST ORDER FOR COUNTY OF LOS ANGELES AND CO-PERMITTEES (NPDES File No. CA0061654, CI 6948, Board Order No. 90-079)**

Pursuant to Water Code Section 13301, enclosed is a copy of a tentative Cease and Desist Order (CDO) requiring the County of Los Angeles and Co-Permittees to cease and desist from discharging wastes contrary to requirements contained in Board Order No. 90-079 (NPDES No. CA0061654), Waste Discharge Requirements for Storm Water/Urban Runoff Discharge for Los Angeles County and Co-Permittees. The proposed CDO requires the County and Co-Permittees to undertake certain actions to implement its storm water/urban runoff monitoring program.

- On Monday, September 26, 1994, the Regional Board at its regular meeting will conduct a public hearing on the issuance of the proposed CDO. The meeting, of which this hearing is a part, will start at 9:30 a.m. in the City Council Chambers, 613 East Broadway, Glendale, California. The Board requests that you and/or your representatives appear at the hearing to present testimony and/or respond to questions concerning the proposed CDO. You may wish to be represented by legal counsel.

A pre-hearing conference to review the CDO with your staff is scheduled for Monday, September 19, 1994, at 10 a.m. at the Regional Board Office.

If you have any questions, please call me at (213) 266-7510 or have your staff call Xavier Swamikannu (213) 266-7592.

for ROBERT P. GHIRELLI, D.Env.  
Executive Officer

Enclosure

cc: See attached mailing list

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MAILING LIST

Jorge León, Office of the Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Regulatory Section, Division of Water Quality, State Water Resources Control Board  
Michael Kahoe, Assistant Secretary, California Environmental Protection Agency  
Catherine Kuhlman, Chief, Permits and Compliance Branch, United States Environmental Protection Agency, Region 9  
Dave Yamahara, Assistant Deputy Director, Waste Management Division, County of Los Angeles, Department of Public Works  
Jim Noyes, Waste Management Division, County of Los Angeles, Department of Public Works,  
Gary Hildebrand, Waste Management Division, County of Los Angeles, Department of Public Works  
Phil Richardson, Storm Water Management Division, Bureau of Engineering, City of Los Angeles

Co-permittees

Bill Paznoukas, California Department of Fish and Game  
Santa Monica Bay Restoration Project, Technical Advisory Committee  
Mark Gold, Executive Director, Heal the Bay  
Everett DeLano, Natural Resources Defense Council  
Lisa Weil, American Oceans Campaign  
Gordon LaBedz, Surfrider Foundation  
Jim Danza, Technical Advisory Committee, Friends of the Los Angeles River

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION  
CEASE AND DESIST ORDER NO. \_\_\_\_\_

REQUIRING LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS  
(LOS ANGELES COUNTY) TO CEASE AND DESIST DISCHARGES  
OF WASTES IN VIOLATION OF BOARD ORDER 90-079.  
(NPDES CA0061654, CI 6948)

The California Regional Water Quality Control Board, Los Angeles Region, finds:

1. The Los Angeles County Department of Public Works is the principal permittee under Board Order No. 90-079, Waste Discharge Requirements for Storm Water/Urban Runoff Discharge for Los Angeles County and Co-Permittees (NPDES No. CA0061654). The County, under an implementation agreement signed with co-permittees, has the primary responsibility for the development and implementation of a storm water monitoring program under Board Order No. 90-079.
2. Section 405 of the Water Quality Act of 1987 added Section 402(p) to the Clean Water Act of 1972. This section requires the United States Environmental Protection Agency (EPA) to establish regulations for storm water and urban runoff discharges under the National Pollutant Discharge Elimination System (NPDES).
3. Section 402(p) of the Clean Water Act includes, under the definition of "municipal separate storm sewer systems", interconnected areawide storm water conveyance systems operated by a lead municipal agency. Los Angeles County Department of Public works, as an owner and operator of a large storm water conveyance and drainage system that serves a population of more than nine million people, is subject to California Water Code Sections 13370, et seq, requiring compliance with provisions of the Federal Clean Water Act (33 USC Section 1251, et seq.).
4. Board Order No. 90-079 contains program items, submittal dates and implementation deadlines for all permittees, including the following Requirements:
  - A. Development and implementation of a Storm Water and Urban Runoff Monitoring Program;

September 7, 1994

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LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS  
CEASE AND DESIST ORDER NO. \_\_\_\_\_

following deadlines to report compliance to the Board:

- |    |  |               |
|----|--|---------------|
| A. | Develop and implement a pilot program and establish stations to monitor long-term trends     | Jan 15, 1994  |
| B. | Develop a program to identify sources of pollutants  | Jan 15, 1994  |
| C. | Develop and implement a program to evaluate BMP effectiveness                                | Jan 15, 1994  |
| D. | Develop and implement a program to identify illicit sources and illegal practices            | Jan 15, 1994  |
| E. | Develop methodology to make refined estimates of pollutants                                  | July 15, 1994 |
| F. | Develop and implement a program to evaluate storm water impacts on selected receiving waters | July 15, 1994 |

The County submitted a revised storm water/urban runoff monitoring program incorporating Board staff's comments, on August 17, 1993. This revised program was to be implemented in all drainage basins consistent with the guidelines provided for by staff for the Santa Monica Bay Drainage Basin. The County has failed to fully implement items A through F in the revised storm water/urban runoff monitoring program by the deadlines provided.

8. The County has, in the interim, continued to collect wet and dry weather water quality data at its existing network of 24 monitoring sites in Los Angeles County. Data from these sites do not provide the information necessary to assess storm water/urban runoff quality and do not meet the objectives of a comprehensive storm water monitoring program.
9. The Los Angeles County Department of Public Works submitted the fourth year annual progress report on July 1, 1994. This report does not demonstrate compliance with and address deficiencies identified in Board staff's 'Second Year Compliance' review of the monitoring program for the Santa Monica Bay Drainage Basin. The County also submitted on the same date, a Proposed Storm Water/Urban Runoff Monitoring Program for Drainage Basins in Phases II and III. This proposed program does not implement the essential monitoring program elements as outlined by Board staff in the 'Second Year Compliance' review. The Los Angeles County Department

LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS  
CEASE AND DESIST ORDER NO. \_\_\_\_\_

of Public Works has repeatedly failed to meet the deadlines for development and implementation of an adequate storm water /urban runoff monitoring program for Phases I, II, and III, as required by Board Order 90-079.

10. To date the County has installed permanent monitoring stations at three locations in the Santa Monica Bay Drainage Basin as part of its Storm Water/Urban Runoff Monitoring Program. These monitoring stations are Trancas Canyon, Malibu Creek, and Ballona Creek. No water quality data has been collected from these sites. In addition, monitoring stations at Kenter Drain, Downtown Los Angeles, City of Santa Monica, Herondo Drain, Palos Verdes, and Manhattan Beach are currently under construction.
11. California Water Code Section 13267(b) provides , in part:

"In conducting an investigation specified in subdivision (a), the regional board may require that any person discharging or proposing to discharge waste within its region ... that could affect the quality of water within its region shall furnish, under penalty of perjury, those technical or monitoring program reports as the board may specify."
12. California Water Code Section 13301 provides, in part:

"When a regional board finds that a discharge of waste is taking place or threatening to take place in violation of requirements or discharge prohibitions prescribed by the regional board or the state board, the board may issue an order to cease and desist and direct that those persons not complying with the requirements or discharge prohibitions (a) comply forthwith, (b) comply in accordance with a time schedule set by the board, or (c) in the event of a threatened violation, take appropriate remedial or preventive action."
13. This enforcement action, which includes a time schedule, is being taken to ensure that the Los Angeles County Department of Public Works comes into compliance with Board Order 90-079.
14. This enforcement action is being taken for the protection of the environment and as such is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000, et. seq.) in accordance with Section 15321, Chapter 3, Title 14, California Code of Regulations.

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LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS  
CEASE AND DESIST ORDER NO. \_\_\_\_\_

The Board notified the discharger and interested agencies and persons of its intent to conduct a public hearing concerning violations or threatened violations of waste discharge requirements.

The Board, in a public hearing, heard and considered all testimony pertinent to this matter. All Orders referred to above and records of hearings and testimony therein are included herein by reference.

IT IS HEREBY ORDERED that, pursuant to California Water Code Section 13301, the Los Angeles County Department of Public Works shall comply with the following:

1. Implement the modified monitoring program approved under Board Order No. 90-079 to control and eliminate the sources of storm water pollution being discharged from the municipal separate storm water drainage system by completing the following actions:

<u>Action</u>	<u>Compliance Report Due</u>
a. Render operational an initial monitoring network of nine stations to establish long-term trends in storm water quality in the Santa Monica Drainage Basin	November 15, 1994
b. Test and integrate a selected storm water model into the monitoring program to refine annual estimates of pollutant loads to Santa Monica Bay	January 15, 1995
c. Implement targeted monitoring to identify sources of specific toxic pollutants in storm water and urban runoff in the Santa Monica Bay Drainage Basin	January 15, 1995
d. Implement a monitoring program to evaluate effectiveness of specific BMPs in the Santa Monica Bay Drainage Basin	January 15, 1995
e. Implement a monitoring program to identify locations of illegal practices, and to eliminate pollutant sources in the Santa Monica Bay Drainage Basin	January 15, 1995
f. Develop and Implement a program to evaluate storm water impacts on selected receiving waters including conducting toxicity studies in the Santa Monica Bay Drainage Basin	January 15, 1995

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LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS  
CEASE AND DESIST ORDER NO. \_\_\_\_\_

- g. Submit a revised monitoring program for Phases II and III that includes all program elements with timelines for implementation January 15, 1995
2. Submit monthly reports of progress on the above requirements beginning November 1994. The monthly reports shall be due on the 15th day of each month. Submit a final report when full compliance is achieved. The final report shall be due March 15, 1995.

In the event that Los Angeles County fails to comply with any of the provisions of this Order or fails to meet the deadlines provided herein, it is the finding of this Board that enforcement actions would be appropriate in order to compel compliance. To that end, upon receipt of evidence that Los Angeles County has violated this Order, the Executive Officer is directed to issue an Administrative Civil Liability Complaint pursuant to California Water Code Section 13323. Violations of this permit may be assessed administratively up to \$10,000 per day of violation and, if there is a discharge, up to \$10 per gallon in excess of one thousand gallons (Water Code Section 13385 (c) (1) (2)). Factors in determining the amount of civil liability include, among other factors, the extent of violations, the ability to pay, the degree of culpability, and economic savings from these violations.

The Board may also refer the case to the Attorney General for injunction and civil monetary remedies, pursuant to appropriate California Water Code sections, including but not limited to Sections 13331, 13350, 13385, and 13386.

I, Robert P. Ghirelli, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on September 26, 1994.

ROBERT P. GHIRELLI, D.Env.  
Executive Officer

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THOMAS A. TIDEMANSON, Director

COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

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ADDRESS ALL CORRESPONDENCE TO:  
LOS ANGELES COUNTY P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE  
WM-3

July 26, 1994

Mr. Mark Pumford  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Mr. Pumford:

**MUNICIPAL STORMWATER PERMIT  
PREPARATION OF REPORT OF WASTE DISCHARGE (ROWD)**

The Municipal Stormwater Permit requires the submittal of an ROWD by December 18, 1994. This report is to include a summary of the results of the monitoring program as required by Task 5.2.1 of the Permit, an assessment of Permittee progress in implementing Best Management Practices (BMPs), and an evaluation of their effectiveness, as required by Tasks 5.2.1, 5.2.2, and 5.2.3, of the Permit. BMPs are to be evaluated on a Countywide basis. As you discussed with Gary Hildebrand and Frank Kuo, of my staff, on May 25, 1994, the ROWD will include the following to comply with the above-mentioned Permit Tasks.

1. Summary of the monitoring data collected through our existing Surface Water Quality Monitoring Program. Included will be an evaluation of trends and its relationship to BMP effectiveness;
2. A matrix which lists the various BMPs attributable to each Co-Permittee. Symbols will be used to illustrate the level of activity (in progress, proposed, etc.) of these BMPs;
3. Written descriptions of the BMPs involved in each Co-Permittee's stormwater management program and the level of implementation;
4. Analysis of the level of activities of the 13 recommended BMPs and, based on information available, a discussion of their effectiveness. Other BMPs beyond the 13 recommended will also be discussed, based on information provided by the Co-Permittees; and

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600



July 20, 1994

Mr. Harry W. Stone, Acting Director of Public Works  
Mr. Brian T. Sasaki, Assistant Deputy Director  
Los Angeles County Department of Public Works  
900 South Fremont Avenue  
Alhambra, CA 91803-1331

**SECTION 401 WATER QUALITY CERTIFICATION WAIVER - MALIBU CREEK  
MONITORING STATION PROJECT, MALIBU CREEK, CITY OF MALIBU, LOS  
ANGELES COUNTY**

We have reviewed your request for water quality certification for the proposed project requiring U.S. Army Corps of Engineer Nationwide Permit Number 5 for scientific measurement devices. The proposed project would involve the installation of two 1-inch conduits within an existing concrete stabilizer located in Malibu Creek. A trench would be dug from the existing gaging station stilling well to approximately four feet into the low flow stream. After the conduits are in place, the trench would be backfilled with concrete to match the existing invert of the concrete stabilizer.

Diversion of the low flow stream would be required to place the conduits. Diversion would be performed by the methods outlined in conditions 7 through 10 contained in the California Department of Fish and Game Streambed Alteration Agreement. These conditions indicate that a low-silt material (e.g., sandbags) berm would be constructed in the downstream portion of the creek and construction of the berm would continue in an upstream direction. Only after the diversion berm is constructed would the stream be diverted. After completion of the proposed project, the diversion berm would be removed.

Our review of the project status summary indicates that all work would be performed within the area of the existing concrete stabilizer. There is no riparian or wetland habitat located in the project site. Our review has indicated that the proposed project would have no significant adverse impacts to water quality or beneficial uses. Therefore, we have decided to waive Water Quality Certification. Any changes to the proposed project would require reapplication to this Regional Board.

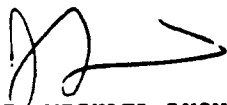
We have no objection to the proposed project provided that you implement the mitigation measures in the California Department of Fish and Game Streambed Alteration Agreement (no. 5-280-94). Our letter will serve as a waiver of Section 401 Water Quality Certification for the Malibu Creek Monitoring Station project, Malibu Creek, City of Malibu, Los Angeles County.

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Mr. Harry W. Stone, Mr. Brian T. Sasaki  
Malibu Creek Monitoring Station Project

Page 2

Should you have any questions concerning this letter, please call  
Morag Logan at (213) 266-7644 or Lauma Jurkevics at (213) 266-7609.



J. MICHAEL LYONS  
Chief, Surveillance Unit

cc: Mr. Aaron Allen, U.S. Army Corps of Engineers (Los Angeles)

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THOMAS A. TIDEMANSON, Director

**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

*ck*

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

July 19, 1994

Dr. Robert P. Ghirelli  
Executive Officer  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

IN REPLY PLEASE  
REFER TO FILE  
WM-3  
JUL 20 AM 11:50  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

Dear Dr. Ghirelli:

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
PERMIT NO. CA0061654 (CI6948) - FOURTH YEAR ANNUAL REPORT**

The Annual Report and attachments were submitted to your office on July 1, 1994. All Co-Permittee submittals were incorporated, including several received after our packaging deadline. The various charts that highlight the Permit compliance submittals and the other attachments were bound to facilitate the review process by your staff.

Please note that the information included in the cover letter of the Report is only a partial summary of submittals and does not include information on all the submittals provided by all Co-Permittees. When reviewing our Annual Report, please utilize the charts and other attachments, which contain all the information submitted by the Co-Permittees.

If any clarification is needed, please contact Mr. Gary Hildebrand at (818) 458-5948, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

T. A. TIDEMANSON  
Director of Public Works

*Brian S. Hooper*  
for DAVE YAMAHARA  
Assistant Deputy Director  
Waste Management Division

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Mr. David Yamahara  
May 4, 1994  
Page 2

information system which the County develops must include other information including:

- 2.1.1 Water quality data and flow data from 1980 to the present to facilitate identification of sources of pollutants present in discharges from the prioritized drainage basin. "Drainage areas" in the drainage basin are to be reported and the "drainage areas" associated with each drainage basin clearly identified;
- 2.1.3 Additional information of a qualitative nature that would contribute to isolating and identifying sources of problems. Such information should include but not be limited to visual observations of factors exacerbating stormwater contamination, principal land use classifications and Standard Industrial Classification (SIC) categories of facilities in "drainage areas", and a description of soils, dumps, landfills, waste disposal sites and Resource Conservation and Recovery Act (RCRA) facilities associated with each area; and
- 2.1.4 ...an estimate of the area of impervious surfaces (including paved areas and building roofs) within each "drainage area".

The County response to this requirement however, was to state that the above three requirements have already been submitted to the Board. This task however, requires that the above information be incorporated into your geographic information system and is requested pursuant to §13267 of the California Water Code and must be submitted to this Board no later than July 14, 1994.

If you have any questions regarding this letter or any permit requirements, please do not hesitate to call me at (213) 266-7510, or have your staff call Mark Purnford at (213) 266-7596 or Carlos Urrunaga at (213) 266-7598.

*Robert P. Ghirelli*

ROBERT P. GHIRELLI, D.Env.  
Executive Officer

cc: Jorge León, Office of Chief Counsel, State Water Resources Control Board  
Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board  
Bill Pierce, Chief, Permits and Compliance Branch, United States Environmental Protection Agency, Region IX  
Gary Hildebrand, Waste Management Division, County of Los Angeles, Department of Public Works

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**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

THOMAS A. TIDEMANSON, Director

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91803-1460

April 21, 1994

Dr. Robert P. Ghirelli  
Executive Officer  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

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Dear Dr. Ghirelli:

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT (NPDES PERMIT)  
NO. CA0061654 (CI6948) - QUARTERLY PROGRESS REPORT**

The following report is submitted in compliance with the above-captioned Permit, which was issued to Los Angeles County, on June 18, 1990. This report provides a summary on the status of specific Permit tasks performed during the third quarter (January 1, 1994, through March 31, 1994) of the fourth year of the Permit which began on July 1, 1993.

**PHASE I FOURTH-YEAR ACTIVITIES**  
**Santa Monica Bay Drainage Basin (SMBDB)**

The primary tasks for Phase I, in the fourth year of the Permit, is to continue to implement Permit compliance activities and to report on progress. The Los Angeles County Department of Public Works (LACDPW) continues to organize and chair the monthly Co-Permittee meetings to coordinate Permit compliance. Enclosed is a chart summarizing the attendance record of the Co-Permittees (Attachment A). Due to the earthquake on January 17, the monthly meetings for January and February were canceled.

Also enclosed is a chart summarizing the Permit submittal compliance status of each Co-Permittee for fourth-year activities (Attachment B).

Phase I Co-Permittees wishing to provide information on the progress of their individual Permit implementation efforts have done so (Attachment C).

**Monitoring Program**

The LACDPW has revised the Stormwater/Urban Runoff Monitoring Program based on recommendations in your June 17, 1993 report, and subsequent meetings with your staff. The refined program was submitted to you in August. Our plan was approved by your agency on December 21, 1993.

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Dr. Robert P. Ghirelli  
April 21, 1994  
Page 2

As a result of the earthquake, the LACDPW staff involved in installing the monitoring stations were reassigned to our earthquake recovery efforts. By early March, staff was again available to resume work on monitoring site installation.

Channel modifications have been completed at the first two automated fixed-site monitoring stations in Ballona and Malibu Creeks. The remaining sampling equipment needed for these stations was not received until March, due to earthquake damage suffered by one of our equipment suppliers. The installation of sampling equipment for the Ballona Creek site was completed in March 1994. We anticipate installing the sampling equipment at the Malibu Creek site by the end of April 1994. Construction permits have been executed by the Malibu West Swimming Club (Homeowners Association) for the Trancas Canyon monitoring station and the Rand Corporation for the Pico-Kenter Drain monitoring station.

The LACDPW is negotiating to secure the right-of-way needed for the Herondo Drain station (Project 1105) and obtaining the necessary city approvals.

The LACDPW has also secured approval from the City of Palos Verdes Estates to construct the sampling station at the outlet to Storm Drain Bond Issue Project No. 558. Design work for the station at the Manhattan Beach Drain (Project 5601) is underway.

As indicated in our January 13, 1994 Quarterly Report, we have selected the U. S. Environmental Protection Agency (EPA) Stormwater Management Model for use in our water quality modeling efforts. We have selected the Kenter Canyon Drain Watershed for modeling in the SMBDB. This 6.4 square mile watershed is typical of the urbanized areas in the SMBDB. It is comprised of multiple land uses, has well-defined boundaries, and has no upstream flow regulation.

#### Other Activities

The LACDPW is continuing to stencil its catch basins. To date, over 4,300 County catch basins have been stencilled in various localities throughout Phase I. All catch basins in the County unincorporated areas in Phase I have been completed. Enclosed is a chart (Attachment D) summarizing the stencilling of the LACDPW catch basins for Phase I.

The LACDPW has completed its "Field Connection Inventory Procedure Manual - For Illegal Connections and Illicit Discharges." This document formalizes the storm drain field inspection program for County storm drains and has been reviewed by the Ballona Creek Cleanup Task Force Subcommittee. A pilot program will be conducted in May 1994 to field test the procedures. The inspection procedures will include testing the practicality of a portable water quality analyzer.

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Dr. Robert P. Ghirelli  
April 21, 1994  
Page 3

The LACDPW is providing input into the drainage and grading plans of a proposed residential development in Ladera Heights which is considering incorporating structural BMPs into its drainage concept. As a test case, the project may include a sluice gate in a manhole to divert nuisance and low flows to a privately maintained oil/water separator. If the developer proceeds with the project, we may be able to evaluate the effectiveness of the concept for possible future implementation on other land development projects.

At the request of the Natural Resources Defense Council, the LACDPW investigated the water quality of Oxford Basin (Duck Pond) in Marina del Rey. The area was sampled a total of four times. The water quality data was submitted to their office. Bacterial levels were below detection limits on the final two rounds of sampling for fecal streptococcus and fecal enterococcus.

LACDPW field personnel have observed a continuous discharge occurring from the subdrain system in Ballona Creek, in the vicinity of Washington Boulevard. Samples taken from the discharge found very high bacteria counts which suggested the source of the discharge was sanitary sewage. The LACDPW, in conjunction with the City of Los Angeles, conducted a thorough investigation to locate the source of the discharge. On February 18, 1994, the City of Los Angeles confirmed that the discharge was from their sewer system. Efforts focused on an eight-inch sewer lateral running parallel to the east side of Ballona Creek channel and the Burdock Siphon. A blockage was removed from this lateral. Since removal of the blockage, flows from the subdrain system have been clear, with bacteria counts returning to background levels. Sampling of two Local Oversight Program (LOP) observation wells at La Cienega and Washington Boulevards was done on February 24, 1994, through our coordination with Brown & Caldwell Engineers and the City of Los Angeles. Concurrently, the City sampled the vents along the banks of the Creek at the vicinity of Ballona Creek and Washington Boulevard. We will keep you informed as to the progress of our investigation.

The LACDPW staff continue to actively participate in the Santa Monica Bay Restoration Project, the Malibu Creek Watershed Plan program, and the Sub-Committees of the Ballona Creek Cleanup Task Force.

#### PHASE II SECOND-YEAR ACTIVITIES

#### Upper Los Angeles River and Upper San Gabriel River Drainage Basins

The second-year tasks for Phase II, as required by the Permit, are underway. This includes additional storm drain mapping and data collection, development of additional BMPs, as well as

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Dr. Robert P. Ghirelli  
April 21, 1994  
Page 4

implementation of Early Action BMPs and development of legal authority. Since not every Co-Permittee submitted all required information, status charts summarizing the Permit submittal compliance status for second-year activities (Attachment E) and for first-year activities (Attachment F) for each Co-Permittee are included.

During this period, the LACDPW organized and chaired Co-Permittee meetings to coordinate Permit compliance. Enclosed is a chart reflecting the attendance record of the Co-Permittees (Attachment G).

As required by first-year Permit Tasks, the LACDPW has completed subdividing the Phase II drainage basins into smaller drainage areas and is currently preparing the final maps for submittal to you. We are also currently developing the associated reports which define land use, soils, and industries by two-digit Standard Industrial Classification (SIC) Code category. Due to the vast size of Phase II drainage basins (approximately 1,110 square miles), and due to a number of technical difficulties encountered in developing the software routines to perform the drainage area characterization work, completion of this task is taking longer than originally estimated. We now anticipate completing this work by June 30, 1994. We had previously estimated the completion of this work by December 30, 1993.

As stated under Phase I, the monitoring program for Phase I has been approved by your agency. With the exception of site locations, we will be proposing a similar program for Phases II and III. Because of this, we have elected to submit a monitoring program to you for Phases II and III combined. The first phase of site selection, the location of mass emission monitoring sites within the Los Angeles and San Gabriel River Drainage Basins, has begun. The second phase will involve locating individual land use sites in the Los Angeles and San Gabriel River Drainage Basins and also locating sites in the Santa Clara River Drainage Basin. We are targeting completion of the first phase by April 30, 1994, and the second phase by August 30, 1994. In preparation for the establishment of the next phase of monitoring stations, we have received bids on the purchase of the sampling equipment for 15 additional stations. The award of the bid is currently being finalized.

The LACDPW is continuing to stencil its catch basins. To date, over 2,400 County catch basins have been stencilled in various localities throughout Phase II. Enclosed is a chart (Attachment H) summarizing the stencilling of the LACDPW catch basins for Phase II.

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Dr. Robert P. Ghirelli  
April 21, 1994  
Page 5

We are nearing completion of posting the "No Dumping" signs at key locations adjacent to flood control channels (bike paths and local parks). To date, 210 signs have been installed and an additional 50 signs, ordered February 15, 1994, will be placed at newly researched sites.

As part of our ongoing efforts in working with the Santa Anita Racetrack to resolve water quality concerns regarding its dry weather discharges, the Racetrack has proposed redirecting its dry weather discharge to the sanitary sewer. A meeting was held on January 5, 1994, between the Racetrack, the County Sanitation Districts of Los Angeles County (CSD), and the LACDPW to discuss the sewer connection fees. A new consultant representing the Racetrack, RVC Associates, was hired. The CSD has approved the proposal and set up a payment schedule which is being reviewed by the Racetrack's attorney. Once approved, the project will commence.

We are also investigating discharges to storm drains from Hollywood Park and Fairplex Park. We will be meeting with Hollywood Park officials in April to discuss their runoff management practices. We are currently researching the extent of the storm drain system in Fairplex Park.

The LACDPW conducted a stormwater management presentation at the March 16, 1994 San Gabriel Valley City Managers' Association meeting.

PHASE III FIRST-YEAR ACTIVITIES (Lower Los Angeles River, Lower San Gabriel River, and Santa Clarita Valley Drainage Basins)

Phase III cities are underway with their first-year activities of submitting hydrologic/water quality data, identification of drains, existing BMPs, identification of waste disposal facilities and industries by SIC Code category, proposed early action BMPs, and the required legal authority for regulation required by the program. Enclosed is a chart (Attachment I) summarizing the Permit submittal compliance status of each Co-Permittee.

The LACDPW organizes and chairs the monthly Co-Permittee meetings to coordinate Permit compliance. Enclosed is a chart summarizing the attendance record of the Co-Permittees (Attachment J).

The LACDPW has begun stencilling of catch basins in Phase III areas. To date, over 2,050 County catch basins have been stencilled in various County unincorporated areas in Phase III. Enclosed is a chart (Attachment K) summarizing the stencilling of the LACDPW catch basins for Phase III.

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Dr. Robert P. Ghirelli  
April 21, 1994  
Page 6

GENERAL NON-PHASE SPECIFIC ACTIVITIES

The 24-hour Hotline Number (1-800-303-0003), for illegal discharges and dumping into storm drains is in effect. We have obtained 100 percent compliance for all Co-Permittees in submitting city contact numbers. Enclosed is a chart (Attachment L) listing the contact numbers. A program has been established for tracking hotline complaints. Heal the Bay has assisted the LACDPW by featuring an article on the HotLine number in their January Newsletter (Attachment M). The LACDPW is investigating other means to increase exposure of the Hotline number. A follow-up warning letter is being finalized which will be used as an education/enforcement tool for minor dumping violations.

We have begun distribution of the following brochures: "Stormwater/Urban Runoff Quality Management Program," "The Ocean Begins At Your Front Door - Non-point Source Pollution," and "Household Hazardous Waste" (HHW). The latter two are being provided to various governmental offices and were handed out at the Eco Fair (Arboretum, Arcadia) and KinderVision (Sports Arena, Los Angeles) events. The HHW booklet, which highlights the importance of protecting streams, rivers, and ocean waters from HHW pollution, is handed out at each Countywide HHW Roundup to every participant (approximately 8,000 so far this calendar year).

The LACDPW remains active in the American Public Works Association/State Water Resources Control Board (APWA/SWRCB) Stormwater Quality Task Force. It also continues to participate in the APWA Water Resources Committee and is assisting in organizing another workshop in October 1994 on Watershed Management.

If you have any questions regarding this matter, please contact Mr. Gary Hildebrand, of this office, at (818) 458-5948, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Acting Director of Public Works

  
DAVID YAMAHARA  
Assistant Deputy Director  
Waste Management Division

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Enc.

cc: All Co-Permittees

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**ATTACHMENT A**

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**ATTACHMENT B**







# City of Malibu

23555 Civic Center Way, Malibu, California 90265  
(310) 456-2489 Fax (310) 456-3356

## ILLICIT STORMWATER DISCHARGE REPORTING FORM

City Representative \_\_\_\_\_  
Date and Time: \_\_\_\_\_ Weather Conditions \_\_\_\_\_

Location: \_\_\_\_\_

Observation (physical appearance, color, turbidity, smell, other): \_\_\_\_\_

Sample Taken (Y) (N), describe: \_\_\_\_\_

Property Owner/Violator Contacts: \_\_\_\_\_

Action Taken: \_\_\_\_\_

Follow-up: \_\_\_\_\_

**Copies to:**

Patrick Dobbins, Deputy City Engineer  
John P. Pavsek, NPDES Coordinator

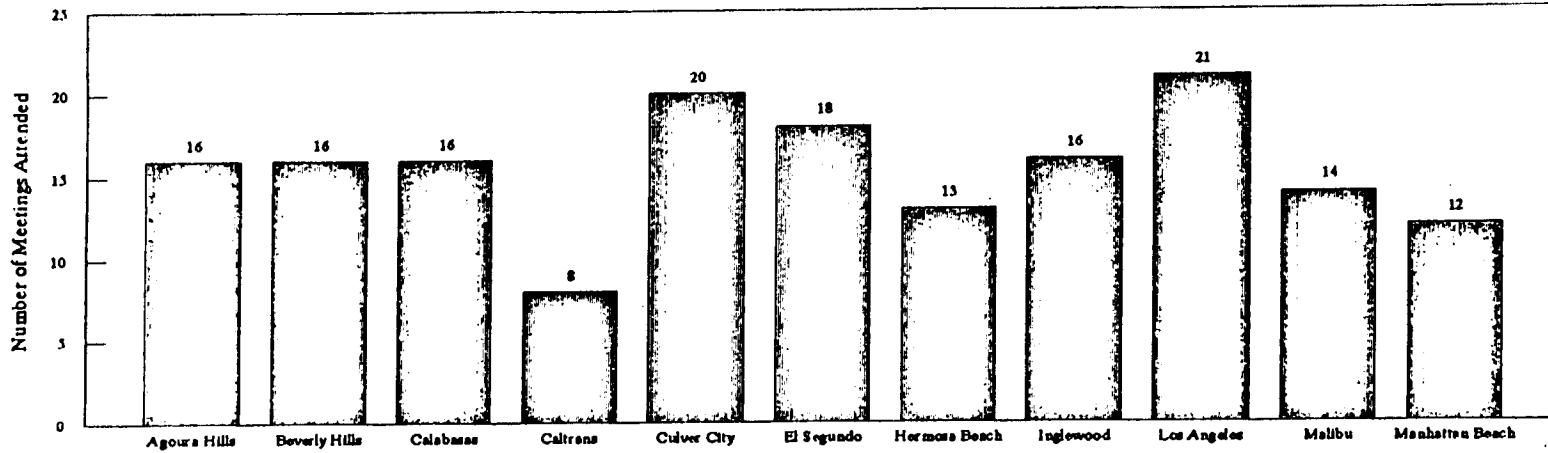
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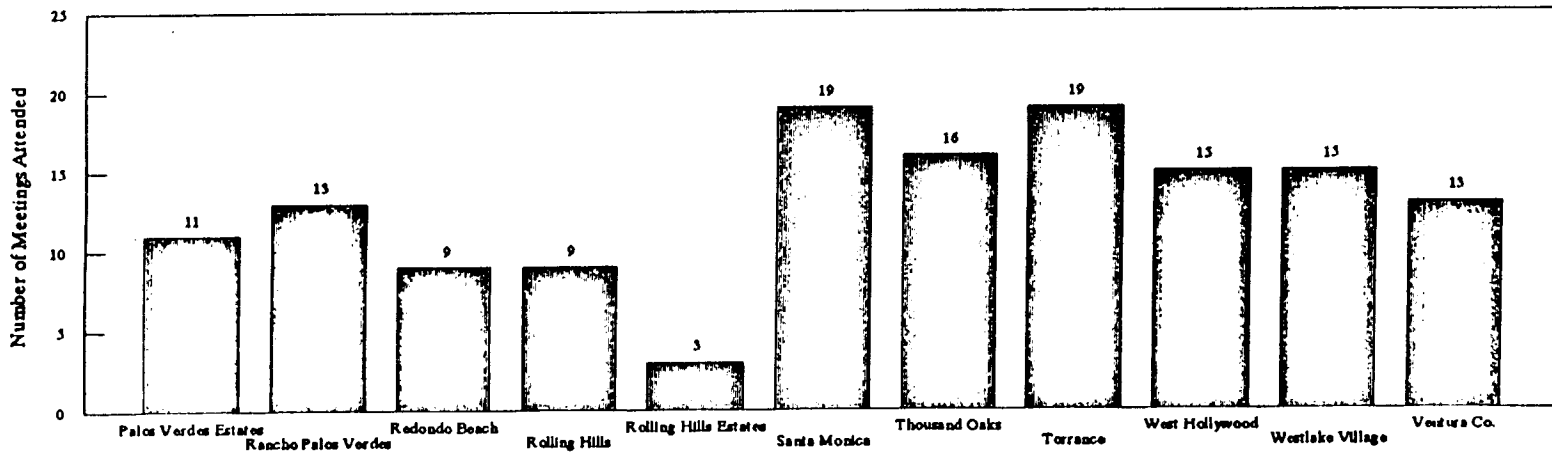
2000-1-11

Phase I Agencies  
**PERMITTEE MEETING ATTENDANCE**

Number of Meetings to Date: 20 (April 21, 1992 to March 15, 1994)



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## PERMITTEE MEETING ATTENDANCE

### Phase I Cities

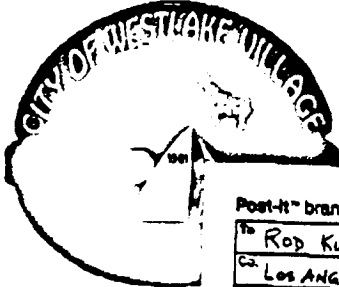
Meeting Date	Agoura Hills	Beverly Hills	Calabasas	Caltrans	Culver City	El Segundo	Hermosa Beach	Inglewood	Los Angeles	Malibu	Manhattan Beach
April 21, 1992											
May 19, 1992	1		1	1	1	1	1	1	1	1	1
June 23, 1992	1	1	1	1	1	1	1	1	1	1	1
July 21, 1992	1			1	1	1	1	1	1		
August 18, 1992	1	1					1	1	1	1	
September 22, 1992					1			1	1		1
October 20, 1992	1		1		1	1		1	1		
November 17, 1992		1	1		1	1		1	1		
January 19, 1993	1	1	1		1	1	1	1	1	1	
February 2, 1993	1	1		1	1	1		1	1		
February 16, 1993		1	1		1	1		1	1	1	
March 16, 1993	1	1			1			1	1		1
April 20, 1993		1	1		1	1	1	1	1	1	1
May 18, 1993	1	1			1	1		1	1	1	1
June 15, 1993	1	1	1		1	1		1	1	1	1
July 20, 1993	1	1	1	1	1	1	1	1	1	1	1
August 17, 1993	1	1	1		1	1	1	1	1	1	1
September 21, 1993	1	1	1	1	1	1	1	1	1	1	1
October 19, 1993	1	1	1	1	1	1	1	1	1	1	1
November 16, 1993	1	1	1	1	1	1	1	1	1	1	1
March 15, 1994	1	1	1		1	1	1	1	1		1
<b>TOTAL</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>8</b>	<b>20</b>	<b>18</b>	<b>13</b>	<b>16</b>	<b>21</b>	<b>14</b>	<b>12</b>

Meeting Date	Palms Verdes	Estimote	Palms V	Redondo Beach	Rolling Hills	Rolling Hills 1st	Santa Monica	Thousand Oaks	Torrance	West Hollywood	Westlake Village	Vertura Co.
April 21, 1992	1				1		1	1	1	1		
May 19, 1992			1				1	1	1	1	1	1
June 23, 1992	1	1			1		1	1	1	1	1	
July 21, 1992	1	1	1				1	1	1	1		
August 18, 1992	1	1					1	1	1		1	
September 22, 1992							1	1	1	1	1	
October 20, 1992			1				1	1	1	1	1	
November 17, 1992			1				1	1	1	1	1	
January 19, 1993	1	1			1		1	1	1	1	1	1
February 2, 1993			1	1	1	1	1	1	1	1	1	1
February 16, 1993	1	1	1	1	1		1	1	1	1	1	1
March 16, 1993	1	1	1				1	1	1	1		1
April 20, 1993	1	1			1		1	1	1	1	1	1
May 18, 1993							1	1	1	1	1	1
June 15, 1993					1		1	1	1	1	1	1
July 20, 1993							1	1	1	1	1	1
August 17, 1993		1	1	1	1	1	1	1	1	1	1	1
September 21, 1993	1	1	1				1	1	1	1	1	1
October 19, 1993	1	1					1	1	1	1	1	1
November 16, 1993		1			1	1	1	1	1	1	1	1
March 15, 1994	1		1	1	1		1	1	1	1	1	1
<b>TOTAL</b>	<b>11</b>	<b>13</b>	<b>9</b>	<b>9</b>	<b>3</b>	<b>19</b>	<b>16</b>	<b>19</b>	<b>15</b>	<b>15</b>	<b>13</b>	<b>13</b>

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VOL 11 0000



March 23, 1994

Mr. Rod Kubamoto  
Waste Management Division  
Los Angeles County Department of Public Works  
P.O. Box 1460  
Alhambra, CA 91803

Post-It brand fax transmittal memo 7871		# of pages = 3	
To	Rod Kubamoto	From	Jim Taylor
Co	Los Angeles County	Co	Willdan Associates
Dept	PUBLIC WORKS, WASTE MGMT DIVISION	Phone #	805-653-6577
Fax #	818-458-4992	Fax #	

(Facsimile sent March 23, 1994)

Subject: City of Westlake Village - Third Quarter Compliance Report  
Phase I Activities

RECEIVED

MAR 23 1994

DEPARTMENT OF PUBLIC WORKS  
WASTE MANAGEMENT DIVISION  
WATER QUALITY SECTION

Dear Rod:

In accordance with our NPDES permit schedule, we are providing you an update on the City's third quarter activities. The activities described herein have occurred since our second quarter compliance letter was sent to you on December 17, 1993. It's our understanding that this update will be included with your third quarter compliance submittal to the Regional Water Quality Control Board.

As we had reported last quarter, the City met with the Natural Resources Defense Council (NRDC) to discuss various compliance issues. Since that meeting, we have completed development of a comprehensive Stormwater Quality Management Plan, primarily addressing the 13 Baseline BMPs. We also responded to a lengthy "punch list" request from the NRDC for additional detail of our existing and proposed practices.

The following is a brief overview of the City's implementation efforts this past quarter:

- *Budget Increase* - City Council approved an increased budget of \$15,200 at their February 9th meeting.
- *Chamber of Commerce Newsletter* - an article was prepared by City staff and published in the local chamber of commerce newsletter in February 1994.
- *Development of Door Hanger and Refrigerator Magnet* - as part of a partnership effort with the City of Malibu, staff developed a public education door hanger and refrigerator magnet for dissemination throughout the City. Distribution is expected to take place early in the next quarter.

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Mr. Rod Kubamoto  
March 23, 1994  
Page 2

- *Management Plan Review Coordination* - as previously discussed in this letter, the City has been working closely with the Regional Board and NRDC to review and revise the Stormwater Quality Management Plan.
- *Industrial Waste Inspections* - staff is working with Los Angeles County Industrial Waste Management to identify mandatory industries and coordinate on-site inspections.
- *Lindero Drain Cleanout* - staff has met with Los Angeles County Drainage Maintenance to discuss appropriate course of action regarding the ongoing maintenance diticulties (debris and odor problems) in the Lindero Canyon Drain (PD 728). Measures currently under consideration include development of a debris-straining boom, and possible introduction of a "friendly" bacteria to curb the odor.
- *Catch Basin Stenciling* - City Council has approved the use of the Ventura County stencil. We believe using the County stencil is regionally consistent, and better serves the purpose of the stenciling program. Stenciling kits have been prepared, and the Chamber of Commerce is being mobilized early in the fourth quarter to begin stenciling.
- *Solid Waste Reduction* - staff has worked closely with the solid waste consultant in the preparation and distribution of a newsletter article regarding the NPDES program. The primary focus of the article is toward used motor oil recycling and prevention of illicit dumping, improper disposal of materials. An NPDES article was written to be included in a solid waste newsletter to be issued in the fourth quarter.
- *QUINT Cities* - On January 28, 1994, staff presented a proposal for regional cooperation between Westlake Village, Thousand Oaks, Calabasas, Agoura and Hidden Hills. The respective City officials were receptive to this concept, we requested the City managers and NPDES coordinators explore potential cross-jurisdictional opportunities.

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MAR 23 1994

DEPARTMENT OF PUBLIC WORKS  
WASTE MANAGEMENT DIVISION  
WATER QUALITY SECTION

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Mr. Rod Kubamoto  
March 23, 1994  
Page 3

If you have any questions with regard to our compliance efforts this quarter, please feel free to call me at (805) 653-6597.

Very truly yours,

CITY OF WESTLAKE VILLAGE

  
John P. Pavsek, P.E.  
Deputy City Engineer

Enclosures

copy: Raymond B. Taylor, City Manager  
John F. Knipe, City Engineer  
Larry W. Wiener, City Attorney  
Everett L. Delano III, Natural Resources Defense Council

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MAR 23 1994

DEPARTMENT OF PUBLIC WORKS  
WASTE MANAGEMENT DIVISION  
WATER QUALITY SECTION

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**YEAR 4 NPDES PERMIT ACTIVITIES  
PHASE I CO-PERMITTEES**

as of: March 31, 1994

Deadlines	Activities	Agoura Hills	Beverly Hills	Calabasas	Caltrans	Culver City	El Segundo	Hemosa Beach	Inglewood	Los Angeles	Malibu	Manhattan Beach
May 10, 1993	24-Hour Spill Response Telephone Number	07/26/93	08/02/93	11/08/93	08/30/93	06/15/93	10/13/93	08/31/93	08/31/93	07/07/93	08/10/93	06/14/93
Sep 23, 1993	Progress Report for First Quarter Report*										09/23/93	
Dec 20, 1993	Progress Report for Second Quarter Report*		12/08/93					12/21/93			12/20/93	
Mar 23, 1994	Progress Report for Third Quarter Report*										03/28/94	
June 25, 1994	Annual Progress Report in Implementing Early Action & Additional BMPs											
	Annual Progress Report in Controlling Pollutants from Construction Sites											
	Annual Progress Report in Detecting & Eliminating Illegal Discharge/Disposal Practices											

Deadlines	Activities	Palos Verdes Estates	Rancho Palos Verdes	Radondo Beach	Rolling Hills	Rolling Hills Estates	Santa Monica	Torrance	West Hollywood	Westlake Village	Ventura County
May 10, 1993	24-Hour Spill Response Telephone Number	05/27/93	12/23/93	03/07/94	11/09/93	06/07/93	05/03/93	08/09/93	05/18/93	08/11/93	12/02/93
Sep 23, 1993	Progress Report for First Quarter Report*	09/29/93								09/23/93	
Dec 20, 1993	Progress Report for Second Quarter Report*									12/20/93	
Mar 23, 1994	Progress Report for Third Quarter Report*									03/23/94	
Jun 25, 1994	Annual Progress Report in Implementing Early Action & Additional BMPs										
	Annual Progress Report in Controlling Pollutants from Construction Sites										
	Annual Progress Report in Detecting & Eliminating Illegal Discharge/Disposal Practices										

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# STENCILING L.A. COUNTY DPW CATCH BASINS

## Santa Monica Bay Drainage Basin (Phase 1)

03/31/94

PERMITTEE (City or Agency)	NO. OF BASINS	LETTER OF APPROVAL		MAPS		PAINTING		COST	
		Acceptable	Condition	Copied	To Op. Serv.	Date Begin	Date End	Total	Per Basin
Agoura Hills	504	Yes	12" resident, 23" com	08/23/93	09/30/93	10/04/93	10/08/93	\$2,269.58	\$4.50
Agrey Hills	836	Yes/No	different fish/city to d	11/18/93	NA	NA	NA	NA	NA
Alabamas	611	Yes	none	08/23/93	09/16/93	09/21/93	09/30/93	\$4,293.46	\$7.03
Altamonte	0	NA		NA	NA	NA	NA	NA	NA
Alver City	521	Yes/No	nonc/city will do all	Yes	NA	NA	NA	NA	NA
Alsegundo	135	No		NA	NA	NA	NA	NA	NA
Arroyo Grande	232	Yes	different size & color						\$0.00
Arroyo Viejo	318								\$0.00
Los Angeles	7248		city to do all						\$0.00
Atascadero	265	Yes	none	Yes	10/07/93	10/12/93	10/18/93	\$2,272.64	\$8.58
Atascadero	159								\$0.00
Atascadero	99	NA	completed by city	NA	NA	NA	NA	NA	NA
Atascadero	468	Yes	23"	Yes	Yes	08/26/93	09/15/93	\$2,940.50	\$6.28
Atascadero	320	Yes	75% complete by city						\$0.00
Atascadero	28	Yes	none	Yes	Yes	08/26/93	09/15/93	\$175.93	\$6.28
Atascadero	88	Yes	smaller size	Yes	Yes	08/26/93	09/15/93	\$552.92	\$6.28
Atascadero	827	Yes	none	Yes	10/19/93	10/20/93	11/08/93	\$5,159.33	\$6.24
Atascadero	811	Yes	wants schedule	11/17/93	11/18/93	11/22/93	12/14/93	\$4,086.44	\$5.04
Atascadero	0	NA		NA	NA	NA	NA	NA	NA
Atascadero	294								\$0.00
Atascadero	239		different wording	08/23/93	NA	NA	NA	NA	NA
LOS ANGELES COUNTY	710	-	-	-	-	-	-	\$5,472.18	\$7.71
- Baldwin Hills	303	NA	NA	11/08/93	11/08/93	11/09/93	11/15/93	\$1,246.24	\$4.11
- El Camino College	4	NA	NA	11/08/93	11/08/93	11/09/93	11/15/93	\$16.46	\$4.12
- Marina Del Rey	24	NA	NA	Yes	Yes	06/22/93	06/22/93	\$520.00	\$21.67
- Santa Monica Mtns.	358	NA	NA	Yes	Yes		Complete	\$3,603.11	\$10.06
- Veterans Administr.	21	NA	NA	11/08/93	11/08/93	11/09/93	11/15/93	\$86.37	\$4.11
Total Number Catch Basins:	14713	(In Phase I)						\$27,222.98	\$6.31
Catch Basins Completed:	4312	(In Phase I)							

Total Number Catch Basins: 24947 (For All Phases)  
 Catch Basins Completed: 9135 (For All Phases)

Total Amount Spent: \$34,438.02 (All Phases)  
 Average Cost Per Basin: \$3.77 (All Phases)

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**STATUS OF YEAR 2 ACTIVITIES FOR PHASE II AGENCIES**

as of: March 31, 1994

Dead - Line	Activities	Alhambra	Arroyo	Azusa	Baldwin Park	Burbury	Burbank	Calexico	Calters	Carament	Covina	Diamond Bar	Duarte	El Monte
Jul 1 1993	Identification of Manholes	08/23/93	07/01/93	10/26/92		11/09/93		NA	08/24/93	11/23/93	08/24/93		08/24/93	08/30/93
	Catch Basin & Sanitary Inlets	08/25/93				11/09/93		NA		12/05/93	08/19/93			07/08/93
	Database (1/2" Disk) of Size & Type of Each Drain	08/23/93		11/30/92		11/09/93		NA	08/24/93	12/01/93	08/24/93	12/15/93	08/24/93	08/30/93
Jul 1 1994	Schedule for Database (1/2" Disk) of Connection Inventory	08/23/93		11/09/92	07/07/93	11/09/93		NA	08/24/93	12/01/93		12/15/93	08/24/93	08/30/93
	24 - Hour Spill Response Telephone Number	09/27/93	09/27/93	08/09/93	10/05/93	11/09/93	10/27/93	NA	12/02/93	10/12/93	10/14/93	12/09/93	10/14/93	08/10/93
Apr. 13 1994	Plan for Additional BMPs for Residential, Commercial, & Industrial			03/03/94				NA						03/28/94
	Plan for Additional BMPs for Regal Discharges & Disposal Practices			03/03/94				NA						03/28/94
	Plan for Additional BMPs for Construction Sites			03/03/94				NA						03/28/94
	Evidence of Progress of Implementation of Early Action BMPs			03/03/94				NA						
May 31 1994	Evidence of All Legal Authority for Regulation of Stormwater/Runoff							NA						

Dead - Line	Activities	Glendale	Glendora	Hidden Hills	Industry	Inverdale	La Canada Flintridge	La Habra Heights	La Puente	La Verne	Los Angeles	Monrovia	Montebello	Montrose Park
Jul 1 1993	Identification of Manholes		07/06/93	07/01/93	10/26/92	12/15/93	10/18/93	08/21/93	04/12/93		NA		10/28/92	
	Catch Basin & Sanitary Inlets				08/17/93	12/15/93	10/18/93	08/24/93	04/12/93		NA	12/01/93	07/08/93	07/26/93
	Database (1/2" Disk) of Size & Type of Each Drain		07/07/93	07/01/93	08/14/93	12/15/93	10/18/93	08/30/93	04/12/93		NA	12/01/93	03/08/94	
Jul 1 1994	Schedule for Database (1/2" Disk) of Connection Inventory			07/01/93	08/14/93		10/18/93	08/30/93	04/12/93		NA	12/01/93	03/08/94	
	24 - Hour Spill Response Telephone Number	10/21/93	10/21/93	09/16/93	08/31/93	11/09/93	10/14/93	01/12/94	11/15/93	08/21/93	NA	12/02/93	01/18/94	01/18/94
Apr. 13 1994	Plan for Additional BMPs for Residential, Commercial, & Industrial						03/17/94							
	Plan for Additional BMPs for Regal Discharges & Disposal Practices						03/17/94							
	Plan for Additional BMPs for Construction Sites						03/17/94							
	Evidence of Progress of Implementation of Early Action BMPs						03/17/94							
May 31 1994	Evidence of All Legal Authority for Regulation of Stormwater/Runoff													

☐ Data Received ☐ Data to be received Acceptable As To Form

NA = Not Applicable or Agency covered under other phase

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**STATUS OF YEAR 2 ACTIVITIES FOR PHASE II AGENCIES**  
as of March 31, 1994

Dead-Weight	Activities	Pasadena	Pomona	Rosemead	San Dimas	San Fernando	San Gabriel	San Mateo	Sierra Madre	South El Monte	South Pasadena	Temple City	Wheatland	West Covina
Jul 1 1993	Identification of Manholes		07/22/93	11/02/93		07/01/93							06/21/93	06/21/93
	Catch Basins & Sizing of Inlets			11/03/93		06/17/93							06/24/93	06/21/93
	Database (3 1/2" Disk) of Size & Type of Each Drain	07/07/93	07/22/93	06/02/93		07/06/93							06/30/93	
Jul 1 1994	Schedule for Database (3 1/2" Disk) of Connection Inventory	07/07/93	07/22/93	06/02/93		07/06/93								
	24-Hour Spill Response Telephone Number	11/06/93	12/02/93	06/26/93	10/14/93	10/12/93	02/01/94	11/16/93	01/13/94	11/16/93	02/02/94	03/06/94	11/17/93	11/06/93
Apr 30 1994	Plan for Addition of BMPs for Residential, Commercial, & Industrial Discharges & Disposal Practices													
	Plan for Addition of BMPs for Legal Construction Sites													
	Evidence of Progress of Implementation of Early Action BMPs					06/16/93								
	Evidence of All Legal Authority for Regulation of Stormwater Runoff					06/16/93								

Data Provided  
 Data Unavailable/Inapplicable As To Plan

NA = Not Applicable or Agency Covered under other plans

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**STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES**  
as of March 31, 1994

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Dead- lines	Activities	Alhambra	Arcade	Azusa	Baldwin Park	Bradbury	Burbank	Calabasas	Caltrans	Claremont	Covina	Diamond Bar	Duarte	El Monte
Sept 30 1992	Submital of Existing Rainfall Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92
	Submital of Existing Flow Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92
	Submital of Existing Water Quality Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	12/02/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92
	Alignment of Storm drain	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92	04/07/93	NA	08/24/93	07/14/92	10/26/92	10/29/92	10/29/92	10/26/92
Oct 30 1992	Identificalion of Natural Drainage Watercourses	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92	04/07/93	NA	08/24/93	07/14/92	10/26/92	10/29/92	10/29/92	10/26/92
	Identificalion of Private Drainage Systems	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92	04/07/93	NA	08/24/93	07/14/92	10/26/92	10/29/92	11/04/92	10/26/92
	Definifion of Drainage Boundaries	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92	04/07/93	NA	08/24/93	07/14/92	10/26/92	10/29/92	11/04/92	10/26/92
	Determination of Existing BMPs for Construction Sites	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA	12/01/93	09/02/92	11/30/92	12/01/92	11/17/92	11/30/92
Nov 30 1992	Existing BMPs for Illegal Discharge & Disposal Practices	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA	12/01/93	09/02/92	11/30/92	12/01/92	11/17/92	11/30/92
	Existing BMPs for Residential, Commercial, & Industrial	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA	12/01/93	09/02/92	11/30/92	12/01/92	11/17/92	11/30/92
	Commercial, & Industrial	12/01/92	12/01/92	11/30/92	12/03/92	12/01/92		NA	12/01/93	09/02/92	12/01/92	12/01/92	11/16/92	12/01/92
	Identification of Waste Disposal Facilities	02/01/93	01/28/93	02/03/93	08/27/92	11/02/92	09/04/93	NA	10/14/92	07/14/92	01/26/93	01/19/93	09/17/92	01/25/93
Feb 1 1993	Disposal Facilities	02/01/93	02/08/93	04/22/93	09/16/92	11/03/92		NA	10/14/92	07/16/92	01/27/93	01/19/93	11/02/92	02/01/93
	Identification of Industries by SIC Code	02/17/93	11/02/92	11/30/92	02/17/93	11/09/93	10/04/93	NA	NA	02/08/93	03/04/93	03/29/93	03/11/93	03/22/93
Mar 1 1993	by SIC Code	02/17/93	03/01/93	11/30/92	03/17/93	11/09/93		NA	NA	02/09/93	03/08/93	03/29/93	03/11/93	03/22/93
	Development of Early Action BMP Plan	03/31/93	04/01/93	04/01/93	02/23/93	04/01/93		NA		03/24/93	03/24/93	03/29/93	03/31/93	03/22/93
Apr 1 1993	Signature Block	04/01/93	04/01/93	04/01/93	03/23/93	04/14/93		NA		03/29/93	04/13/93	03/29/93	03/31/93	03/22/93
	Signature Block	04/22/93	04/22/93	04/22/93	04/12/93	04/26/93	04/26/93	NA	NA	04/20/93	04/19/93	04/15/93	04/22/93	04/14/93
Apr 19 1993	Submital of	04/22/93	04/22/93	04/22/93	04/12/93	04/26/93	04/26/93	NA	NA	04/20/93	04/19/93	04/15/93	04/22/93	04/14/93
	Signature Block	04/22/93	04/22/93	04/22/93	04/12/93	04/26/93	04/26/93	NA	NA	04/20/93	04/19/93	04/15/93	04/22/93	04/14/93
	Required Legal Authority for Regulation of Stormwater/Urban Runoff	05/13/93	05/18/93	05/05/93	05/18/93		08/04/93	NA		08/01/93	05/11/93	05/11/93	08/18/93	05/04/93
May 13 1993	Stormwater Permit	05/13/93	05/18/93	05/05/93	05/18/93		08/05/93	NA		08/01/93	05/11/93	05/11/93	08/18/93	05/04/93
	Implementation Agreement	05/13/93	05/26/93	05/13/93	08/24/93	08/02/93	08/22/93	NA	NA	08/01/93	05/11/93	08/08/93	05/19/93	08/17/93
		05/17/93	08/28/93	05/17/93	08/24/93	08/02/93	08/22/93	NA	NA	08/08/93	05/11/93	05/10/93	05/20/93	05/17/93

☐ Date Received  
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NA = Not applicable or agency covered under other phase

LTA VMP PHASE I

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STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES

as of: March 31, 1994

214  
211  
211

213  
214

211

Dead- lines	Activities	Glendale	Glendora	Hidden Hills	Industry	Inwindsle	La Canada Flintdridge	La Habra Heights	La Puente	La Verne	Los Angeles	Monrovia	Montebello	Monterey Park
Sept 30 1992	Submital of Existing Rainfall Data	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92	09/23/92	02/04/93	09/14/92	08/27/91	08/17/92	09/14/92	09/14/92
	Submital of Existing Flow Data	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92	09/23/92	02/04/93	09/14/92	08/08/91	08/17/92	09/14/92	09/14/92
	Submital of Existing Water Quality Data	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92	09/23/92	02/04/93	09/14/92	09/30/92	08/17/92	09/14/92	09/14/92
	Alignment of Stormdrain	09/14/92	09/02/92	10/06/92	08/06/92	10/07/92	09/30/92	09/24/92	02/08/93	09/14/92	10/05/92	08/20/92	09/14/92	09/14/92
Oct 30 1992	Identification of Natural Drainage Watercourses	11/03/92	11/03/92	11/03/92	11/03/92	12/15/93	11/03/92	11/03/92	03/02/93	11/25/92	10/28/92	10/27/92	10/27/92	11/03/92
	Identification of Private Drainage Systems	11/03/92	11/03/92	11/03/92	11/03/92	12/15/93	11/03/92	11/03/92	03/02/93	11/25/92	10/28/92	10/27/92	10/27/92	11/03/92
	Definition of Drainage Boundaries	11/03/92	11/03/92	11/03/92	11/03/92	12/15/93	11/03/92	11/03/92	03/02/93	11/25/92	10/28/92	10/27/92	10/27/92	11/03/92
	Determination of Existing BMPs for Construction Sites	11/30/92	11/30/92	11/30/92	11/30/92	12/30/93	02/03/93	12/01/92	02/17/93	12/02/92	03/13/90	11/25/92	11/30/92	11/30/92
	Existing BMPs for Illegal Discharge & Disposal Practices	12/01/92	12/01/92	12/01/92	11/30/92	12/30/93	01/04/93	12/01/92	02/17/93	12/02/92	03/13/90	11/25/92	11/30/92	11/30/92
	Existing BMPs for Residential, Commercial, & Industrial	12/01/92	12/01/92	12/01/92	11/30/92	12/30/93	01/04/93	12/01/92	02/17/93	12/02/92	03/13/90	11/25/92	11/30/92	11/30/92
Feb. 1 1993	Identification of Waste Disposal Facilities	02/18/93	01/25/93	11/03/92	01/19/93		02/03/93	09/23/92	02/04/93	12/07/92	07/30/92	02/02/93	01/27/93	02/18/93
Mar. 1 1993	Identification of Industries by SIC Code	02/03/93	01/25/93	05/11/93	02/22/93		02/03/93	12/02/92	02/04/93	03/06/93	12/08/92	10/27/92	01/27/93	03/09/93
Apr. 1 1993	Development of Early Action BMP Plan	04/12/93	03/29/93	04/05/93	04/07/93		04/06/93	03/31/93	03/31/93	03/30/93	04/05/93	04/05/93	04/07/93	04/22/93
Apr. 15 1993	Submital of Signature Block	04/22/93	04/22/93	04/26/93	04/26/93		04/26/93	04/12/93	04/12/93	04/20/93		04/22/93	04/19/93	04/22/93
May 15 1993	Required Legal Authority for Regulation of Stormwater/Urban Runoff		07/12/93	05/18/93	05/12/93		08/23/93	04/28/93	04/28/93	05/18/93	09/20/91		07/08/93	05/17/93
	Stormwater Permit Implementation Agreement	05/05/93	05/13/93	05/24/93	05/18/93	06/07/93	08/23/93	04/18/93	08/02/93	05/18/93		08/04/93	05/25/93	11/04/93

☐ Date Received  
☐ Date Determined Acceptable As to Form

NA - Not applicable or agency covered under other phase

R0032914

LTA VM/PHASE II

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## STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES

as of: March 31, 1994

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211

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213  
218

212

Dead- lines	Activities	Pasadena	Pomona	Rosemead	San Dimas	San Famendo	San Gabriel	San Marino	Sierra Madre	South El Monte	South Pasadena	Temple City	Walnut	West Covina
Sept 30 1992	Submital of Existing Rainfall Data	09/21/92	10/08/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	10/13/92	09/12/92	10/20/92	09/26/92	09/30/92	09/17/92
	Submital of Existing Flow Data	09/21/92	10/08/92	09/22/92	09/14/92	10/05/92	09/29/92	10/07/92	10/13/92	09/12/92	10/20/92	09/26/92	09/30/92	09/17/92
	Submital of Existing Water Quality Data	09/21/92	10/08/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	11/24/92	09/12/92	10/20/92	09/26/92	09/30/92	09/17/92
		09/21/92	10/08/92	09/22/92	09/14/92	10/05/92	09/29/92	10/07/92	11/25/92	09/20/92	10/20/92	10/06/92	09/30/92	09/17/92
Oct 30 1992	Alignment of Stormdrain	11/03/92	11/16/92	11/02/92	11/25/92	07/29/92	10/28/92		12/01/92	10/19/92	11/12/92	10/29/92	11/01/92	07/28/92
	Identification of Natural Drainage Watercourses	11/03/92	11/16/92	11/02/92	11/25/92	07/29/92	10/28/92		12/01/92	10/19/92	11/12/92	10/29/92	11/01/92	07/28/92
	Identification of Private Drainage Systems	11/03/92	11/16/92	11/02/92	11/25/92	09/15/92	11/24/92		12/01/92		11/18/92	11/04/92	11/01/92	03/29/92
	Definition of Drainage Boundaries	11/03/92	11/16/92	11/02/92	11/25/92	09/15/92	11/24/92		04/07/93	10/19/92	11/12/92	11/16/92	11/25/92	07/28/92
		11/03/92	11/16/92	11/02/92	11/25/92	11/02/92	12/03/92		04/12/93	10/26/92	11/16/92	11/17/92	11/25/92	10/06/92
		12/02/92	12/02/92	11/30/92	09/09/92	11/24/92	11/30/92	12/02/93	11/24/92	11/30/92		11/16/92	11/30/92	01/05/93
Nov 30 1992	Determination of Existing BMPs for Construction Sites	12/02/92	12/02/92	12/01/92	09/14/92	11/24/92	12/01/92	12/02/93	11/24/92	12/01/92		11/17/92	11/30/92	01/05/93
	Existing BMPs for Illegal Discharge & Disposal Practices	12/02/92	12/02/92	11/30/92	09/09/92	11/24/92	12/01/92	12/02/93	11/23/92	12/01/92		11/17/92	11/30/92	01/05/93
	Existing BMPs for Residential, Commercial, & Industrial	12/02/92	12/02/92	12/01/92	09/09/92	11/24/92	11/30/92	12/02/93	11/24/92	11/30/92		11/16/92	11/30/92	01/05/93
		12/02/92	12/02/92	12/01/92	09/14/92	11/24/92	12/01/92	12/02/93	11/25/92	12/01/92		11/17/92	11/30/92	01/05/93
		09/21/92	02/03/93	02/03/93	09/09/92	10/01/92	01/20/93	12/02/93	11/24/92		09/04/93	10/30/92	11/30/92	09/15/92
Feb. 1 1993	Identification of Waste Disposal Facilities	02/06/93	02/24/93	03/02/93	10/14/93	10/19/92	01/20/93	12/02/93	11/25/92			11/02/92	11/30/92	02/04/93
Mar. 1 1993	Identification of Industries by SIC Code	03/06/93	04/15/93	02/06/93	03/04/93	01/19/93	02/17/93	12/02/93			09/04/93	11/16/92	12/02/92	03/06/93
		03/09/93	04/15/93	02/09/93	03/08/93	01/19/93	02/17/93	12/02/93			09/05/93	11/16/92	12/03/92	03/06/93
Apr. 1 1993	Development of Early Action BMP Plan	03/23/93	04/12/93	04/05/93	04/12/93	04/01/93	03/31/93	12/10/93	04/06/93	04/01/93			03/11/93	03/29/93
		04/07/93	04/12/93	04/05/93	04/12/93	04/01/93	03/31/93	12/10/93	04/06/93	04/01/93			04/01/93	04/01/93
Apr. 19 1993	Submital of Signature Block	04/12/93	04/22/93	04/12/93	04/21/93	04/15/93	04/21/93	04/26/93	04/26/93	04/22/93		04/26/93	04/12/93	04/12/93
		04/12/93	04/22/93	04/12/93	04/21/93	04/15/93	04/21/93	04/26/93	04/26/93	04/22/93		04/26/93	04/12/93	04/12/93
May 13 1993	Required Legal Authority for Regulation of Stormwater/Urban Runoff	05/13/93	09/02/93	05/11/93		09/08/93	05/12/93	12/10/93					04/28/93	05/17/93
	Stormwater Permit	05/17/93	09/08/93	05/11/93		09/08/93	05/17/93	12/10/93					04/28/93	05/17/93
	Implementation Agreement	09/17/93	09/08/93	09/30/93	09/28/93	10/07/93	09/12/93	09/18/93	09/24/93	09/08/93	10/06/93	11/29/93	05/20/93	09/21/93

  Date Received  
  Date Determined Acceptable As to Form

NA = Not applicable or agency covered under other phase

LTA:VM/PHASE II

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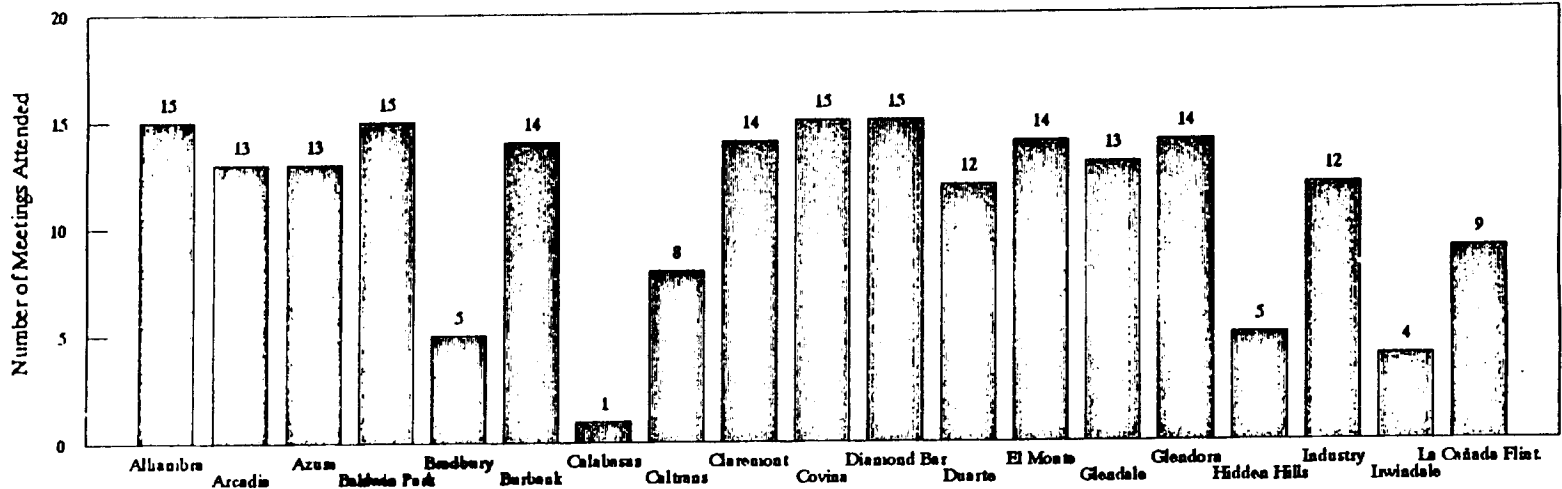
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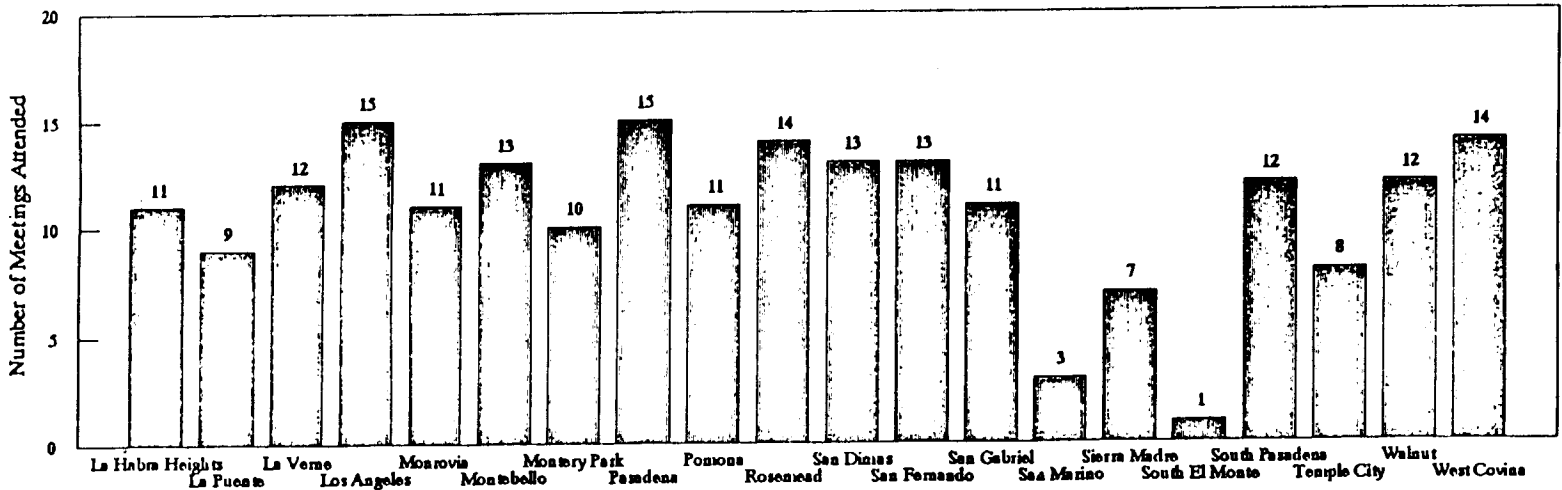
ATTACHMENT G

# Phase II Agencies PERMITTEE MEETING ATTENDANCE

Number of Meetings to Date: 15 (August 5, 1992 to February 2, 1994)



SEM/A.ATTENDIIA.CGM



SEM/A.ATTENDIIB.CGM

R0032917

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**PERMITEE MEETING ATTENDANCE**  
Phase II Cities

Month/Date	Alexandria	Archie	Ashe	Baldwin Park	Bradley	Burham	Caldwell	Calverton	Clarendon	Conroe	Eastwood	Dumas	El Monte	Greenville	Greensboro	Highland	Irvington	La Grange	Ph...
April 3, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Sept. 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
October 7, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
November 4, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
December 2, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
February 3, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
March 3, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
April 7, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
May 3, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
June 2, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
July 7, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
August 4, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
October 6, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
December 1, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
February 2, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
TOTAL	15	15	15	15	15	14	1	8	14	15	15	12	14	13	14	5	12	4	9

Month/Date	Alhambra	La Puente	La Verne	Los Angeles	Monrovia	Montebello	Montrose Park	Pasadena	Fountain	Rosemead	San Dimas	San Fernando	San Gabriel	San Marino	Sherrill	Madro	South El Monte	South Pasadena	Temple City	Walnut	West Covina
April 3, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Sept. 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
October 7, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
November 4, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
December 2, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
February 3, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
March 3, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
April 7, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
May 3, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
June 2, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
July 7, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
August 4, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
October 6, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
December 1, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
February 2, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
TOTAL	11	9	12	15	11	13	10	15	11	14	13	13	11	3	7	1	12	8	12	14	14

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ATTACHMENT H

# STENCILING L.A. COUNTY DPW CATCH BASINS

Upper Los Angeles and San Gabriel River Basins (Phase II)

03/31/94

CO-PERMITTEE (City or Agency)	NO. OF BASINS	LETTER OF APPROVAL		MAPS		PAINTING		COST	
		Acceptable	Condition	Copied	To Op. Serv.	Date Begin	Date End	Total	Per Basin
Alhambra <sup>3</sup>									ERR
Arcadia									ERR
Azusa									ERR
Baldwin Park									ERR
Bradbury									ERR
Barbanc									ERR
Calabasas <sup>1</sup>	see I								
Caltrans <sup>13</sup>	0	NA		NA	NA	NA	NA	NA	NA
Claremont									ERR
Covina									ERR
Diamond Bar	1082	Yes	NA	01/27/94	01/31/94	01/31/94	03/02/94	\$739.61	\$0.00
Duarte									ERR
El Monte									ERR
Glendale <sup>3</sup>									ERR
Glendora									ERR
Hidden Hills									ERR
Industry									ERR
Irwindale									ERR
La Cañada Flintridge <sup>3</sup>									ERR
La Habra Heights <sup>3</sup>									ERR
La Puente	300			02/10/94					\$0.00
La Verne									ERR
Los Angeles <sup>13</sup>			city to do all						ERR
Monrovia									ERR
Montebello <sup>3</sup>									ERR
Monterey Park									ERR
Pasadena <sup>3</sup>									ERR
Pomona									ERR
Rosemead									ERR
San Dimas									ERR
San Fernando									ERR
San Gabriel									ERR
San Marino									ERR
Sierra Madre									ERR
South El Monte									ERR
South Pasadena <sup>3</sup>									ERR
Temple City									ERR
Walnut	113			03/08/94					\$0.00
West Covina	531			03/08/94					\$0.00
LOS ANGELES COUNTY	4137	-	-	-	-	-	-	\$2,693.45	\$0.65
- Altadena <sup>3</sup>	748	NA	NA	12/29/93	01/03/94	01/04/94	01/14/94	\$2,693.45	\$3.60
- Arcadia	120	NA	NA	03/28/94					\$0.00
- Azusa	58	NA	NA	02/16/94					\$0.00
- Bassett / Valinda	528	NA	NA	02/16/94	03/03/94	03/03/94	03/16/94		\$0.00
- Claremont	8	NA	NA	02/22/94					\$0.00
- Covina	406	NA	N/A	02/22/94	03/16/94	03/16/94	03/24/94		\$0.00
- Duarte	13	NA	NA	03/28/94					\$0.00
- Glendora	26	NA	NA	02/22/94					\$0.00
- Hacienda Heights <sup>3</sup>	see III								ERR
- La Crescenta	283	NA	NA	03/16/94	03/24/94	03/28/94			\$0.00
- La Puente	285	NA	NA	02/16/94					\$0.00
- La Verne	16	NA	NA	03/21/94					\$0.00
- Monrovia	133	NA	NA	03/28/94					\$0.00
- Montrose	43	NA	NA	03/16/94	03/24/94	03/28/94			\$0.00
- Pasadena	212	NA	NA	03/17/94					\$0.00
- Rowland Heights	597	NA	NA	01/19/94	01/20/94	01/20/94	01/27/94		\$0.00
- San Gabriel	243	NA	NA	03/28/94					\$0.00
- Santa Monica Mtns. <sup>1</sup>		NA	NA						ERR
- South San Gabriel	111	NA	NA	03/28/94					\$0.00
- Walnut	307	NA	NA	02/16/94					\$0.00
								\$2,693.45	\$0.80

Total Number Catch Basins: 6163 (In Phase II)  
 Catch Basins Completed: 3361 (In Phase II)

\* material/equipment only (upto 2/15/94)

CBS/A-STENCIL WK3

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ATTACHMENT I

STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES

as of March 31, 1994

Dead-Ends	Activities	Alhambra	Artesia	Bell	Bell Gardens	Bellflower	Caltrans	Carson	Cerritos	Commerce	Compton	Cudahy	Downey	El Segundo	Gardena	Glendale	Hawthorn Gardens
	Letter of Intent	NA	09/18/93	09/24/93	09/23/93	09/21/93	NA	09/08/93	09/24/93	09/08/93	07/28/93	09/21/93	09/21/93	NA	09/05/93	NA	07/01/93
Sept 30 1993	Submission of Existing Rainfield Data	NA	03/07/94	09/31/93	09/21/93	09/03/93	09/22/93	09/31/93	09/22/93	03/08/94	02/28/94	09/25/93	09/25/93	NA	09/28/93	NA	03/03/94
	Submission of Existing Flow Data	NA	03/07/94	09/31/93	09/21/93	09/03/93	09/22/93	09/31/93	09/22/93	03/08/94	02/28/94	09/25/93	09/25/93	NA	09/28/93	NA	03/03/94
	Submission of Existing Water Quality Data	NA	03/22/94	09/31/93	09/21/93	09/03/93	09/22/93	09/31/93	09/22/93			09/25/93	09/25/93	NA	09/28/93	NA	
	24-Hour Spill Response Telephone Number	NA	10/25/93	09/07/93	09/07/93	09/27/93	09/30/93	09/27/93	10/04/93	11/08/93	11/08/93	09/16/93	11/17/93	NA	11/08/93	NA	11/08/93
	Alignment of Stormdrain	NA		10/26/93	10/27/93	09/27/93		10/26/93	11/03/93		10/07/93	10/28/93	10/27/93	NA	10/07/93	NA	
Oct 28 1993	Identification of Natural Drainage Watercourses	NA		10/28/93	10/27/93	09/27/93		10/26/93	11/03/93		10/07/93	10/28/93	10/27/93	NA	10/07/93	NA	
	Identification of Private Drainage Systems	NA		10/28/93	10/27/93	09/27/93		10/26/93	11/03/93		10/07/93	10/28/93	10/27/93	NA	10/07/93	NA	
	Definition of Drainage Boundaries	NA		11/02/93	10/27/93	09/27/93		10/26/93	11/03/93		10/07/93	10/28/93	10/27/93	NA	10/07/93	NA	
	Determination of Existing BMPs for Construction Sites	NA	03/23/94	11/30/93	11/24/93	11/23/93	12/01/93	11/29/93	12/22/93		11/30/93	11/24/93	11/24/93	NA	11/29/93	NA	
	Editing BMPs for Illegal Discharge & Disposal Practices	NA	03/23/94	11/30/93	11/24/93	11/23/93	12/01/93	11/29/93	12/22/93		11/30/93	11/24/93	11/24/93	NA	11/29/93	NA	
Feb 1 1994	Editing BMPs for Residential Commercial & Industrial	NA	03/23/94	11/30/93	11/24/93	11/23/93	12/01/93	11/29/93	12/22/93		11/30/93	11/24/93	11/24/93	NA	11/29/93	NA	
	Identification of Waste Disposal Facilities	NA	03/23/94	01/26/94	09/21/93	11/01/93	02/01/94	02/01/94	11/09/93		01/26/94	02/02/94	NA	12/07/93	NA		
Mar 1 1994	Identification of Industries by SIC Code	NA	03/22/94	02/23/94	12/20/93	02/02/94		02/16/94	02/02/94		02/23/94	02/23/94	NA	12/09/93	NA		
	Development of Early Action BMP Plan	NA	03/22/94	03/30/94	03/30/94			03/30/94			03/30/94		NA	01/26/94	NA		
May 12 1994	Required Legal Authority for Regulation of Stormwater/Urban Runoff	NA			01/20/94	03/03/94								NA	03/31/94	NA	
	Stormwater Permit Implementation Agreement	NA			01/20/94	03/16/94								NA	03/31/94	NA	
		NA			11/08/93									NA	11/18/93	NA	

☐ Data Received  
☐ Data Determined Acceptable As to Form

NA = Not applicable or agency covered under other phase

R0032922

LTA WMAPHASE III

03-03-94 11 10



STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES

as of March 31, 1994

Dead- Line	Activities	Hawthorne	Huntington Park	Inglewood	La Canada Flintledge	La Habra Heights	La Mirada	Lakewood	Leventdale	Lomita	Long Beach	Los Angeles	Lynwood	Maywood	Montebello	Norwalk	Palos Verdes Estates	
	Letter of Intent	02/03/93	02/01/93	NA	04/22/93	NA	07/21/93	08/30/93	09/21/93	09/14/93	09/10/93	NA	09/21/93	09/30/93	NA	09/24/93	NA	
Sept 30 1993	Submission of Existing Rainfall Data	09/18/93	09/05/93	NA	09/05/93		09/29/93	09/29/93	09/29/93	03/07/94	09/27/93	09/27/93	09/08/93	09/25/93	NA	09/13/93	NA	
	Submission of Existing Flow Data	09/18/93	09/05/93	NA	09/05/93		09/29/93	09/29/93	09/29/93	03/07/94	09/27/93	09/27/93	09/08/93	09/25/93	NA	09/13/93	NA	
	Submission of Existing Water Quality Data	09/18/93	09/05/93	NA	09/05/93		09/29/93	09/29/93	09/29/93	03/07/94	09/27/93	09/27/93	09/08/93	09/25/93	NA	09/13/93	NA	
Oct 14 1993	24-Hour Spill Response Telephone Number	01/28/94	10/05/93	NA	10/14/93	01/12/94	01/12/94	11/10/93	10/28/93	02/10/94	09/27/93	01/07/93	11/18/93	09/18/93	NA	10/18/93	NA	
Oct 26 1993	Alignment of Stormdrain	10/27/93	10/05/93	NA	10/18/93		10/27/93	10/27/93	10/28/93		10/27/93	10/27/93		10/28/93	NA	10/27/93	NA	
	Identification of Natural Drainage Watercourses	11/01/93	09/05/93	NA	10/18/93		11/08/93	11/01/93	11/02/93		10/27/93	11/01/93		11/02/93	NA	11/02/93	NA	
	Identification of Private Drainage Systems	10/27/93	09/05/93	NA	10/18/93		11/08/93	11/01/93	11/02/93		10/27/93	11/01/93		11/02/93	NA	11/02/93	NA	
	Definition of Drainage Boundaries	10/27/93	10/05/93	NA	10/18/93		10/27/93	10/27/93	10/28/93		10/27/93	10/27/93		10/28/93	NA	10/27/93	NA	
Nov 30 1993	Determination of Existing BMPs for Construction Sites	11/30/93	11/30/93	NA	11/23/93		11/24/93	12/01/93	11/30/93		11/30/93	03/13/91		11/30/93	NA	11/23/93	NA	
	Existing BMPs for Illegal Discharge & Disposal Practices	11/30/93	11/30/93	NA	11/23/93		11/24/93	12/01/93	11/30/93		11/30/93	03/13/91		11/30/93	NA	11/23/93	NA	
	Existing BMPs for Residential, Commercial & Industrial	11/30/93	11/30/93	NA	11/23/93		11/24/93	12/01/93	11/30/93		11/30/93	05/13/91		11/30/93	NA	11/23/93	NA	
Feb 1 1994	Identification of Waste Disposal Facilities	01/28/94	01/10/94	NA	12/07/93		01/28/94	02/02/94	02/02/94		01/31/94	07/03/91	09/08/93	01/28/94	NA	02/01/94	NA	
Mar 1 1994	Identification of Industries by SIC Code	03/02/94	10/05/93	NA	12/07/93		02/23/94	11/10/93	03/02/94		10/27/93	10/04/92	09/08/93	02/23/94	NA	02/15/94	NA	
Mar 31 1994	Development of Early Action BMP Plan		03/17/94	NA	02/02/94		03/30/94				03/31/94	04/05/93			NA		NA	
May 12 1994	Required Legal Authority for Regulation of Stormwater/Urban Runoff			NA								09/29/91			NA		NA	
	Stormwater Permit Implementation Agreement		02/24/94	NA	NA		10/04/93						11/18/93		NA	11/08/93	NA	

Data Received  
 Date Determined Acceptable As to Form

NA = Not applicable or agency covered under other phase

R0032923

174 V09PHASE III

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**STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES**

as of March 31, 1994

Dead-line	Activities	Paramount	Pasadena	Pico Rivera	Rancho Pablos Verdes	Redondo Beach	Rolling Hills	Rollins Hills Est	Santa Clarita	Santa Fe Springs	Signal Hill	South Gate	South Pasadena	Torrance	Vernon	Whittier
	Letter of Intent	06/06/93	NA	06/24/93	NA	NA	NA	NA	06/14/93	06/19/93	06/21/93	06/24/93	NA	NA	06/08/93	06/21/93
Sept 30 1993	Submital of Existing	06/20/93	NA	06/07/93		NA	NA		06/27/93	06/21/93	06/31/93	06/18/93	NA	NA	06/21/93	06/08/93
	Rainfall Data	06/20/93	NA	06/07/93		NA	NA		06/27/93	06/21/93	06/31/93	06/18/93	NA	NA	06/21/93	06/08/93
	Submital of Existing	06/20/93	NA	06/07/93		NA	NA		06/27/93	06/21/93	06/31/93	06/23/93	NA	NA	06/21/93	06/08/93
	Fbw Data	06/20/93	NA	06/07/93		NA	NA		06/27/93	06/21/93	06/31/93	06/23/93	NA	NA	06/21/93	06/08/93
	Submital of Existing	06/20/93	NA	06/07/93		NA	NA		06/27/93	06/21/93	06/31/93	06/23/93	NA	NA	06/21/93	06/08/93
	Water Quality Data	06/20/93	NA	06/07/93		NA	NA		06/27/93	06/21/93	06/31/93	06/23/93	NA	NA	06/21/93	06/08/93
Oct 14 1993	24 - Hour Spill Response	06/07/93	NA	10/28/93	05/27/93	NA	NA	06/07/93	10/27/93	10/18/93	06/31/93	06/29/93	NA	06/06/93	10/28/93	06/08/93
	Telephone Number	06/07/93	NA	10/28/93	05/27/93	NA	NA	06/07/93	10/27/93	10/18/93	06/31/93	06/29/93	NA	06/06/93	10/28/93	06/08/93
Oct 26 1993	Alignment of Stormdrain	10/27/93	NA	10/28/93		NA	NA		10/27/93	10/27/93	11/01/93	10/27/93	NA	11/03/93	10/28/93	10/27/93
	Identificatbn of Natural Drainage Water courses	11/01/93	NA	11/02/93		NA	NA		11/01/93	11/01/93	11/10/93	11/02/93	NA	11/03/93	11/02/93	11/01/93
	Identificatbn of Private Drainage Systems	11/01/93	NA	11/02/93		NA	NA		11/01/93	11/01/93	11/10/93	11/02/93	NA	11/03/93	11/02/93	11/01/93
	Identificatbn of Private Drainage Systems	10/27/93	NA	10/28/93		NA	NA		10/27/93	10/27/93	11/01/93	10/27/93	NA	11/03/93	10/28/93	10/27/93
	Identificatbn of Private Drainage Systems	11/01/93	NA	11/02/93		NA	NA		11/01/93	11/01/93	11/10/93	11/02/93	NA	11/03/93	11/02/93	11/01/93
	Identificatbn of Private Drainage Systems	10/27/93	NA	10/28/93		NA	NA		10/27/93	10/27/93	11/01/93	10/27/93	NA	11/03/93	10/28/93	10/27/93
Nov 30 1993	Determinatbn of Existing BMPs for Construction Sites	11/24/93	NA	12/01/93		NA	NA		11/29/93	11/24/93	12/01/93	11/24/93	NA	NA	11/29/93	12/01/93
	Existing BMPs for illegal Discharge & Disposal Practices	11/24/93	NA	12/01/93		NA	NA		11/29/93	11/24/93	12/01/93	11/24/93	NA	NA	11/29/93	12/01/93
	Existing BMPs for Residential Commercial & Industrial	11/24/93	NA	12/01/93		NA	NA		11/29/93	11/24/93	12/01/93	11/24/93	NA	NA	11/29/93	12/01/93
	Existing BMPs for Residential Commercial & Industrial	11/24/93	NA	12/01/93		NA	NA		11/29/93	11/24/93	12/01/93	11/24/93	NA	NA	11/29/93	12/01/93
	Existing BMPs for Residential Commercial & Industrial	11/24/93	NA	12/01/93		NA	NA		11/29/93	11/24/93	12/01/93	11/24/93	NA	NA	11/29/93	12/01/93
Feb 1 1994	Identificatbn of Waste Disposal Facilities	06/20/93	NA	06/07/93		NA	NA		10/14/93	01/31/94	01/25/94	01/31/94	NA	NA	02/01/94	02/02/94
	Identificatbn of Waste Disposal Facilities	06/20/93	NA	10/13/93		NA	NA		10/18/93	01/31/94	01/25/94	01/31/94	NA	NA	02/01/94	02/02/94
Mar 1 1994	Identificatbn of Industries by SIC Code	12/20/93	NA	06/07/93		NA	NA		12/09/93	03/01/94	06/24/93	06/13/93	NA	NA	02/28/94	03/01/94
	Identificatbn of Industries by SIC Code	12/20/93	NA	06/07/93		NA	NA		12/09/93	03/01/94	06/24/93	06/13/93	NA	NA	02/28/94	03/01/94
Mar 31 1994	Development of Early Action BMP Plan	03/30/94	NA			NA	NA			03/31/94	03/24/94	03/17/94		NA	03/28/94	
	Development of Early Action BMP Plan	03/30/94	NA			NA	NA			03/31/94	03/24/94	03/17/94		NA	03/28/94	
May 12 1994	Required Legal Authority for Regulation of Stormwater/Urban Runoff	01/20/94	NA	06/07/93		NA	NA		03/18/94			11/18/93	NA	NA		
	Stormwater Permit	02/06/94	NA	06/24/93		NA	NA					06/28/93	NA	NA	12/27/93	
	Implementation Agreement	02/06/94	NA	06/24/93		NA	NA					06/28/93	NA	NA	12/27/93	

Date Received  
 Date Determined Acceptable As To Form

NA = Not applicable or agency covered under other phase

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**ATTACHMENT J**

# STENCILING L.A. COUNTY DRAINAGE CATCH BASINS

Lower Los Angeles and San Gabriel River Basins; Santa Clarita Valley (Phase III)

04/12/94

VOL 11  
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CO-PERMITTEE (# of Agency)	NO. OF BASINS	LETTER OF APPROVAL		MAPS		PAINTING		COST	
		Acceptable	Condition	Copies	To Or Serv.	Date Begin	Date End	Total	Per Basin
Artesia									ERR
Bell									ERR
Bell Gardens									ERR
Bellflower									ERR
Caltrans <sup>1,2</sup>	0	NA		NA	NA	NA	NA	NA	NA
Carson									ERR
Cerritos									ERR
Commerce									ERR
Compton									ERR
Cudahy									ERR
Downey									ERR
El Segundo <sup>1</sup>	see I								
Gardena									ERR
Glendale <sup>2</sup>									ERR
Hawaiian Gardens									ERR
Hawthorne									ERR
Huntington Park									ERR
Inglewood <sup>1</sup>	see I								
La Cañada Flintridge <sup>2</sup>									ERR
La Habra Heights <sup>2</sup>									ERR
La Mirada									ERR
Lakewood									ERR
Lawndale	313			02/15/94					\$0.00
Lomita									ERR
Long Beach									ERR
Los Angeles <sup>1,2</sup>	610		city to do all	02/07/94					ERR
Lynwood									\$0.00
Maywood <sup>2</sup>									ERR
Montebello <sup>2</sup>									ERR
Norwalk									ERR
Palos Verdes Estates <sup>1</sup>	see I								
Paramount									ERR
Pasadena <sup>2</sup>									ERR
> Rivera									ERR
> Palos Verdes <sup>1</sup>	see I								
Redondo Beach <sup>1</sup>									ERR
Rolling Hills <sup>1</sup>	see I								
Rolling Hills Estates <sup>1</sup>	see I								
Santa Clarita									ERR
Santa Fe Springs									ERR
Signal Hill									ERR
South Gate									ERR
South Pasadena <sup>2</sup>									ERR
Torrance <sup>1</sup>	see I								
Vernon									ERR
Whittier									ERR
<b>LOS ANGELES COUNTY</b>	<b>4285</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>\$4,521.59</b>	<b>\$1.06</b>
- Altadena <sup>2</sup>	see II								
- Athens	300	NA	NA	03/29/94					\$0.00
- City Terrace	159	NA	NA	12/14/93	12/14/93	12/15/93	01/03/94	\$748.85	\$4.71
- Compton	116	NA	NA	05/05/93					\$0.00
- East Los Angeles	705	NA	NA	12/14/93	12/14/93	12/15/93	01/03/94	\$3,320.36	\$4.71
- Florence	109	NA	NA						\$0.00
- Gardena	121	NA	NA	03/31/94					\$0.00
- Hacienda Heights <sup>2</sup>	526	NA	NA	01/25/93	01/31/94	01/31/94	03/02/94	\$384.60*	\$0.00
- Hawthorne	63	NA	NA	03/29/93					\$0.00
- Industry	98	NA	NA						\$0.00
- La Habra Heights	3	NA	NA						\$0.00
- La Mirada	17	NA	NA						\$0.00
- Lawndale	68	NA	NA	04/14/94					\$0.00
- Lennox	36	NA	NA	03/28/94					\$0.00
- Long Beach	1	NA	NA	04/11/94					\$0.00
- Norwalk	1	NA	NA						\$0.00
- Palos Verdes	72	NA	NA	08/21/93	08/26/93	08/26/93	09/15/93	\$452.38	\$6.28
- Rowland Heights <sup>2</sup>	see II								
- Santa Fe Springs	351	NA	NA						\$0.00
- South San Gabriel <sup>2</sup>		NA	NA						ERR
- Torrance	171	NA	NA	04/16/94					\$0.00
- Vernon	13	NA	NA						\$0.00
- Walnut Park	31	NA	NA						\$0.00
- Whittier	655	NA	NA	04/12/94					\$0.00
- Willowbrook	69	NA	NA	03/30/94					\$0.00
<b>Total Number Catch Basins:</b>	<b>5200 (In Phase III)</b>							<b>\$4,521.59</b>	<b>\$3.00</b>
<b>Catch Basins Completed:</b>	<b>1462 (In Phase III)</b>								

\* material/equipment only (upto 2/15/94)

ATTACHMENT K

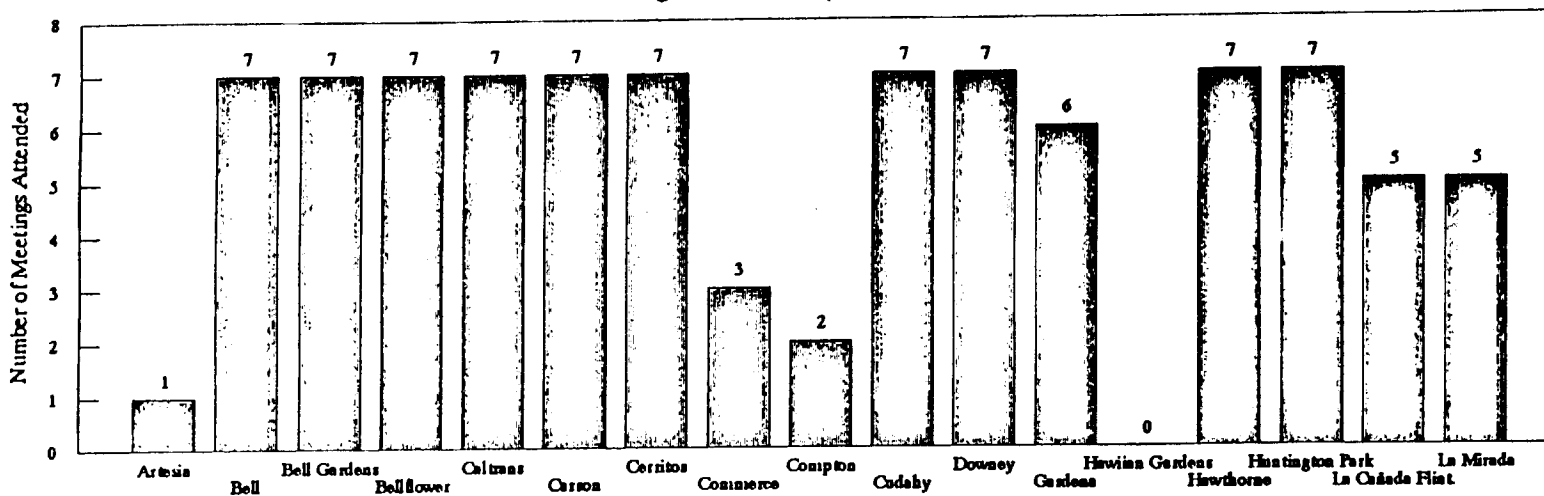
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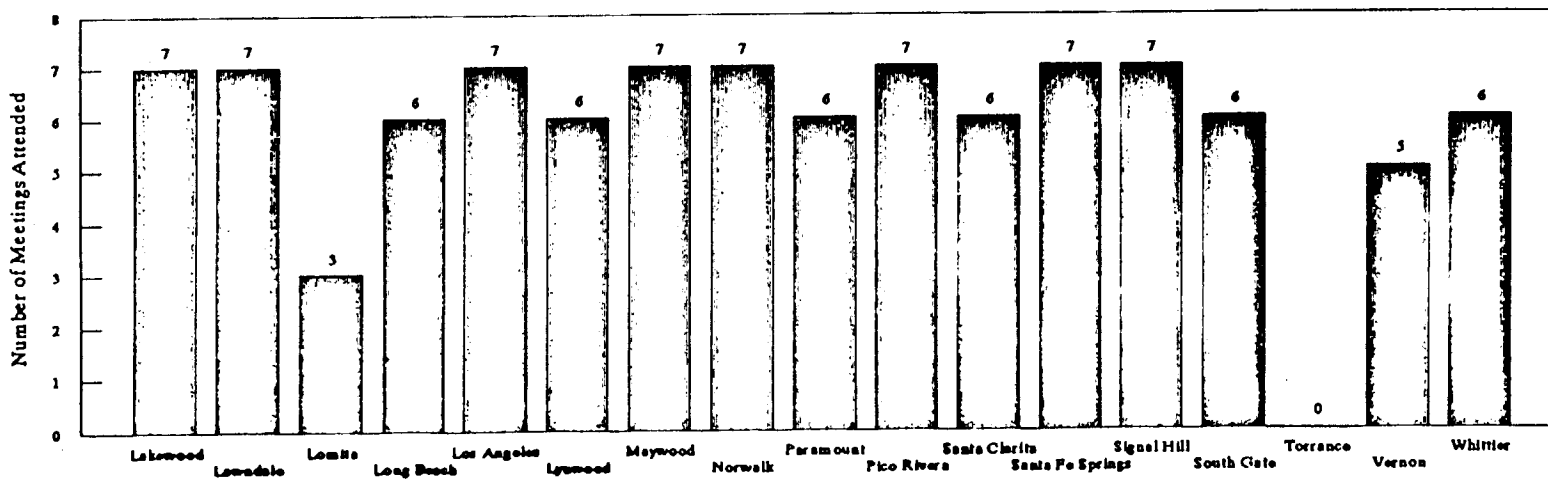
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# Phase III Agencies MONTHLY PERMITTEE MEETING ATTENDANCE

Number of Meetings to Date: 7 (July 28, 1993 to February 23, 1994)



SEM/A:ATTNDIII.CGM



R0032928

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MONTHLY PERMITTEE MEETING ATTENDANCE  
Phase III Agencies

R0032929

Meeting Date	Arvin	Bell	Bell Gardens	Bellflower	Citrus	Cosum	Carbu	Commerce	Compton	Culby	Dowry	Oakdale	Hawthorn	Hawthorn	Hawthorn Park	La Cañada Flw.	La Habra
July 28, 1993		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
August 25, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
September 22, 1993		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
October 27, 1993		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
November 24, 1993		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
January 26, 1994		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
February 23, 1994		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
TOTAL	1	7	7	7	7	7	7	7	7	7	7	6	0	7	7	7	7

Meeting Date	Lakewood	Lanvale	Lemo	Long Beach	Los Angeles	Lynwood	Maywood	Norwalk	Paramount	Pico Rivera	Santa Clarita	Santa Fe Spring	Signal Hill	South Gate	Torrance	Vernon	Whittier
July 28, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
August 25, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
September 22, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
October 27, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
November 24, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
January 26, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
February 23, 1994	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
TOTAL	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7

SEMA ATTEN III WEEKS

The following are agencies in Phase I or Phase II which are not likely to participate in Phase III but have not submitted a letter to the RWQCB indicating that all Phase III activities were covered under Phase I or Phase II:

- Rancho Palms Verdes (I)
- Redondo Beach (I)
- Rolling Hills Estates (I)
- La Habra Heights (II)

The following are agencies in Phase I or Phase II which will not participate in Phase III because they have submitted a letter to the RWQCB indicating that all Phase III activities were covered under Phase I or Phase II:

- El Segundo (I)
- La Brea (I)
- Palms Verdes Estates (I)
- Rolling Hills (I)
- Alhambra (II)
- Glendale (II)
- Montebello (II)
- Pasadena (II)
- South Pasadena (II)
- Redondo Beach (I)

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ATTACHMENT L



**24-HOUR SPILL RESPONSE TELEPHONE NUMBERS**

<u>AGENCY</u>	<u>NUMBER</u>	<u>TIME</u>	<u>CONTACT</u>
Agoura Hills	(818) 597-7322 (818) 878-1808	7am-6pm/M-Th non-business hours	Public Works Department Sheriff, Lost Hills Station
Alhambra	(818) 570-5168	24 hours	Police Department
Arcadia	(818) 446-2111	24 hours	Police Department
Artesia	(310) 865-6262 (310) 866-9061	8am-5pm/M-F non-business	City Hall Sheriff, Lakewood Station
Avalon	(310) 510-0174	24 hours	Sheriff Dispatcher
Azusa	(818) 334-2943	24 hours	Police Department
Baldwin Park	(818) 960-1955	24 hours	Police Department
Bell	(213) 588-6211 (213) 585-1245	business hours non-business hours	Dave East Police Department
Bell Gardens	(310) 806-7770 (310) 806-4573	7:30am-4pm/M-F non-business hours	Public Works Department Police Department
Bellflower	(310) 866-9061	24 hours	Sheriff, Lakewood Station
Beverly Hills	(310) 281-2701	24 hours	Fire Department
Bradbury	(818) 280-8543 (818) 444-2585	8am-5pm non-business hours	County Fire Department Fire Department Dispatch
(DUMPING ON CITY STREETS, GUTTERS, SIDEWALKS, & DRAINS)			
Burbank	(818) 953-9622 (818) 563-0816	6:30am-4pm/M-F non-business hours	Public Works Street & Sewer Maint. Pager for Ralph Costanzo [1-15 of month] or Elvin Estes [16-31 of month], Sanitary Sewer/Storm Drain Maintenance
	(818) 842-6692 (805) 252-9020	non-business hours non-business hours	Jim Villasenor, Street & Alley Maint. George Reed, Commercial Refuse Collection
	(818) 362-4554	non-business hours	Henry Garcia, Residential Refuse Collection
(DUMPING/DISPOSAL IN CITY PARKS, TRAILS, OR HILLSIDE OPEN SPACE)			
	(818) 953-9575	6:30am-6:30pm/M-F	Jan Bartola, Deputy Director of Park Service
	(818) 953-9576	6:30am-6:30pm/M-F	Tim Lorman or Richard Tomlinson, Landscape Supervisors of Park Landscape Maintenance
	(818) 953-9576	8am-4pm/SS	Ronald Palmer, Weekend Supervisor of Park Services
(SPILLS OF POTENTIALLY FLAMMABLE, TOXIC, OR HAZARDOUS MATERIAL)			
	(818) 953-8772 (818) 847-8611		Burbank Fire Department Burbank Fire Department Hazardous Materials Response Unit

VOL 11 00001933

**24-HOUR FULL RESPONSE TELEPHONE NUMBERS**

<u>AGENCY</u>	<u>NUMBER</u>	<u>TIME</u>	<u>CONTACT</u>
Castroville	(818) 878-4225 (818) 591-9682	8am-5pm/M-F non-business hours	City Hall City Manager
CALTRANS	(213) 897-0383	24 hours	Communications Center
Carson	(310) 830-7600 (310) 830-1123	business hours non-business hours	City Hall Sheriff
Cerritos	(310) 860-0311 (310) 860-4018	business hours non-business hours	Mary Anne Wozniak, Maint. Super. Exchange
Claremont	(909) 629-9671	24 hours	Fire Department
Commerce	(213) 881-6190 (213) 887-4460 (213) 721-4662 (213) 722-4805	24 hours 8am-6pm/M-Th 8am-6pm/M-Th non-business hours	Fire Department Capt. Jee Bob Sepulveda Bob Sepulveda
Compton	(310) 605-5505 (310) 605-5600	8am-5:30pm non-business hours	Public Works Police Department
Covina	(818) 858-4413 (818) 331-3391	24 hours 24 hours	Police Dispatcher Police Front Desk
Cudahy	(213) 773-5143 (213) 264-4151	24 hours 24 hours	Nic Mull, Cudahy Sheriff
Culver City	(310) 202-5817 (818) 458-3559	24 hours 7am-5:30pm/M-Th	Fire Dept. Code Enf.(illegal dumping) Joe Baiocco, L.A. Co. Dept. of Public Works (illegal discharges)
Diamond Bar	(909) 595-2264	24 hours	Sheriff, Walnut Station
Downey	(310) 861-9221	24 hours	Fire Department
Duarte	(818) 357-7931 (818) 451-2078 (909) 861-0096	7:30am-6pm/M-Th non-business hours non-business hours	Beeper number Bill Ornelas, home number
El Monte	(818) 580-2100 (818) 580-2150	24 hours 24 hours	Police Department Fire Department
El Segundo	(310) 322-9114	24 hours	Police Department
Gardena	(310) 217-9568 (310) 217-9670	8am-5pm non-business hours	Public Works Department Police Department
Glendale	(818) 956-4800	24 hours	Fire Department
Glendora	(818) 914-8250	24 hours	Police Department
Hawaiian Gardens	(310) 970-7084	24 hours	Police Department
Hawthorne	(310) 970-7052	24 hours	Police Dispatcher

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24-HOUR HILL RESPONSE TELEPHONE NUMBERS

AGENCY	NUMBER	TIME	CONTACT
Hermosa Beach	(310) 318-0313	24 hours	Police Dispatcher
Hidden Hills	(213) 890-4317 (213) 881-2455	7am-5:30pm/M-F non-business hours	L.A. Co. Fire Department L.A. Co. Fire Department
Huntington Park	(213) 587-5211	24 hours	Police Department
Industry	(818) 964-1518 (818) 458-7174 (818) 458-4357 (818) 333-2211 (818) 333-0336 (818) 967-6431	business hours business hours non-business hours business hours business hours non-business hours	Dennis Helling, L.A. Co. Road Dept. L.A. Co. Sewer Maintenance L.A. Co. Road Dept. & Sewer Maint. John Ballas, City Engineer Brian Ridenour, NPDES Coordinator City of Industry
Inglewood	(310) 412-5350  (310) 412-5340 (310) 412-5333 (310) 412-8770	8am-5pm / Mon, Tue, Thu, Fri. 6am-3pm /M-F 7:30am-4pm/M-F 24 hours	Lorenzo Gartmon, Hazardous Material Storage, Inspection & Permits Ed Rinehart, Catch Basin Cleaning Richard Kennon, NPDES Permit Adm. Fire Department
Irwindale	(818) 963-3601	24 hours	Police Department
La Cañada Flintridge	(818) 790-8880 (818) 248-3464	7am-6pm non-business hours	La Cañada Flintridge Sheriff, Crescenta Valley Station
La Habra Heights	(310) 694-6302  (310) 694-8283	8am-7pm/M 8am-12pm/T-TH non-business hours	City Hall  City Volunteer Fire Dept.
Lakewood	(310) 866-9771 x2500 (310) 866-9061	7:30am-5:30pm/M-F non-business hours	Public Works Sheriff
La Mirada	(310) 943-0131 x250 (213) 881-2455	7am-5pm/M-F non-business hours	Environmental Services Dept. L.A. County Fire Department
Lancaster	(805) 723-6211 (805) 540-1579	7:30am-4:30pm/M-F non-business hours	Operations Number Pager Number
La Puente	(818) 855-1500 (909) 861-8355	8am-5pm/M-F non-business hours	City Hall Don Allen
La Verne	(909) 596-8741 (909) 596-1913	8am-6pm/M-Th non-business hours	Public Works Department Police Department
Lawndale	(310) 970-2160 (310) 671-7531 (310) 679-1131	8am-5pm/M-F 24 hours 24 hours	Public Works Department Sheriff L.A. County Fire Department
Lomita	(310) 325-7110 (310) 539-1661	8:15am-4:30/M-F 24 hours	Gary Irwin Sheriff
Long Beach	(310) 570-2700 SAME AS ABOVE	7:30am-4:30pm/M-F non-business hours	Public Service Bureau Fire Department

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**24-HOUR SPILL RESPONSE TELEPHONE NUMBERS**

<u>AGENCY</u>	<u>NUMBER</u>	<u>TIME</u>	<u>CONTACT</u>
Angeles	(213) 485-6185	24 hours	Fire Department (hazardous materials) Street Maintenance (non-hazardous on right-of-way) Sanitation (non-hazardous into storm drain)
	(213) 485-7100	24 hours	
	(213) 485-5886	24 hours	
Lynwood	(310) 603-0267 (310) 861-9221	7am-6pm/M-Th non-business hours	Engineering Fire Department
Malibu	(310) 456-2489 (818) 878-1801	9am-5pm/M-Th non-business hours	Ed Bianchi, Public Works Observer Sheriff
Manhattan Beach	(310) 545-5621 x380 (310) 545-5621 x222	business hours non-business hours	Public Service Department Police Department
Maywood	(213) 562-5022 (213) 562-5005	business hours non-business hours	Ed Ahrens, Maywood Police Department
Monrovia	(818) 359-3231 x362 (818) 359-1152	7am-6pm/M-Th non-business hours	Karen Mendoza Police Department
Montebello	(213) 887-1470  (213) 887-4510 (213) 887-1212	8am-5pm/M-F  24 hours 24 hours	Jesse Hernandez/Mike Kosareff Public Works Department Charlie Ford, HAZMAT Fire Dept Cpt Mike Knight, Police Dept
Monterey Park	(818) 307-1320 (818) 307-1200	8am-5pm/M-F non-business hours	City Engineer Police Dept. Watch Officer
Norwalk	(310) 929-2677 (310) 863-8711	8am-6pm/M-F non-business hours	Public Services Department Sheriff
Palmdale	(805) 267-5234 (805) 267-4300	8:30am-5pm/M-F non-business hours	Code Enforcement Division Sheriff
Palos Verdes Estates	(310) 378-4211 (310) 373-1054	24 hours 24 hours	Police Department Mark Hart, Public Works
Paramount	(310) 220-2020 (310) 866-9061	7:30-5:30pm/M-Th non-business hours	Public Works Department Sheriff, Lakewood Station
Pasadena	(818) 405-4501	24 hours	Police Department
Pico Rivera	(310) 949-2421	24 hours	Sheriff
Pomona	(909) 629-5333 (909) 620-2361 (909) 620-2371 (909) 620-2261	24 hours 24 hours 8am-6pm/M-Th 8am-6pm/M-Th	Hotline Public Works, Street/Sanitation Enforcement Office Chuck Sihler, Blane Frandsen, Glen Lewis
Sancho Palos Verdes	(310) 539-1661	24 hours	Sheriff
Redondo Beach	(310) 379-5416	24 hours	Fire Dispatcher

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**24-HOUR SPILL RESPONSE TELEPHONE NUMBERS**

<u>AGENCY</u>	<u>NUMBER</u>	<u>TIME</u>	<u>CONTACT</u>
Rolling Hills	(310) 377-1521 (310) 539-1661	7:30am-5pm non-business hours	City Manager Sheriff
Rolling Hills Estates	(310) 377-1577 (310) 539-1661	business hours non-business hours	City Hall Sheriff
Rosemead	(818) 288-6671 (818) 285-7171 (818) 458-HELP	7am-6pm/M-Th non-business hours non-business hours	Engineering Division Sheriff, Temple City Station L.A. Co. Sewer Maintenance Div.
San Dimas	(909) 394-6240 (909) 595-2264	working hours non-working hours	Department of Public Works Sheriff, Walnut Station
San Fernando	(818) 898-1293  (818) 898-1267	7:30am-5:30pm/M-Th (8am-5pm/F) non-business hours	Public Works Department  Police Department
San Gabriel	(818) 288-5050	24 hours	Fire Department
San Marino	(818) 300-0715 (818) 300-0716 (818) 300-0720	8am-5pm/M-F 8am-5pm/M-F non-business hours	Jim Salman Jim Salman Police Department
Santa Clarita	(805) 294-2520 (805) 255-4953 (805) 255-4935 (805) 255-1121	8am-5pm/M-F 8am-5pm/M-F 8am-5pm/M-F 24 hours	Dennis Welch, Street Supv. Nancy Delange, Assoc. Engineer Building & Safety, Inspectors Sheriff
Santa Fe Springs	(310) 944-9713 (310) 868-1711	8am-5pm/M-F 24 hours	Fire Department, Santa Fe Springs Fire Department, Downey Dispatch
Santa Monica	(310) 458-8536 (310) 826-6712 (310) 458-8671	business hours 24 hours 24 hours	(catch basins) Storm Drain Maint. (catch basins) Water Plant Oper. (illegal dumping) Fire Dept. Dispatch
Sierra Madre	(818) 355-1414	24 hours	Police Department
Signal Hill	(310) 989-7200	24 hours	Police Department
South El Monte	(818) 285-7171	24 hours	Sheriff
South Gate	(213) 563-5400	24 hours	Police Department
South Pasadena	(818) 799-1121	24 hours	Police & Fire Dispatcher
Temple City	(818) 285-2171 (818) 285-7171	8am-6pm/M-TH 24 hours	John Hyatt Sheriff, Temple City Station
Torrance	(310) 618-5641	24 hours	Police Department
Ventura County	(805) 654-5000	24 hours	

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**ATTACHMENT M**

# Dumpbusers on Duty at 1-800-303-0003

by Suman Shealey

My most vivid images of childhood are beautiful California summer days. The one thing that could tear me away from bike riding and playing ball was the faint jingle of the ice cream truck in the distance. I spent many happy times sitting on the curb eating popsicles. I remember tossing the popsicle stick into the "gutter" and running off to join my friends. When I was young that curb opening meant something totally different to me than it does now. I was raised to believe that "out of sight was out of mind." I thought that my trash would just go away.

It was not until I started my internship at Heal the Bay that I understood that the curb opening I used to put my trash in was a storm drain. Catch basins (or curb openings) are the inlets to the storm drain system. Everything that goes into a catch basin flows through a storm drain, and eventually out to sea. Only storm water belongs in storm drains. Unlike the sewer systems, there is no treatment process whatsoever. Toxins, animal waste and trash

accumulate, causing potential health risks.

One of the biggest contributions to Santa Monica Bay pollution is the illegal dumping of toxic substances and large volumes of construction waste into storm drains. What constitutes illegal dumping? Almost anything (except water) that is discharged or disposed into storm drains or catch basins without a permit. Individuals, homes and motor homes never have permits. Neither do some businesses.

We now have a tool to stop major violators. L.A. County has put an Illegal Dumping Hotline into place. Heal the Bay's Storm Drain Task Force has been pressuring the county for more than 2 1/2 years for a hotline for citizens to report illegal dumping. Special thanks go to Erica Martin of the County District Attorney's office, Steve O'Neill formerly from the same office, the L.A. County Department of Public Works and County Supervisor Ed Edelman and his entire office. Their support was a great help in implementing the hotline.

You are urged to call the number if you see anyone illegally dumping toxic materials such as gasoline, motor oil, paint and even construction waste (cement). When you call, a dispatcher will need the location of the dumping, and a record of what you saw. Heal the Bay also recommends that you phone in the locations of gas stations and restaurants that are illegally hosing off their properties. Especially in cases with repeated occurrences, the dispatcher will forward the information to local law enforcement or the Hazardous Waste Unit to investigate. Next, the District Attorney's office will decide if there is a case to prosecute. If not, we hope the County will send the violators a warning letter. The main goal of the hotline is to pinpoint locations and catch violators.

It's sad to see that people still dump their trash into storm drains and then go off to play. I want to live with the images of blue waters, not images of waste slowly floating towards me in the surf.

The hotline is 1-800-303-0003.

## HEAL THE BAY

1640 FIFTH STREET, SUITE 204  
SANTA MONICA, CALIFORNIA  
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address correction requested

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April 21, 1994

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CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

TO: Phase I Co-Permittees  
FROM: Gary Hildebrand *Gloft*  
County of Los Angeles  
Department of Public Works

**ANNUAL PROGRESS REPORT**

As discussed in our April 19, 1994, Co-Permittee meeting, we are providing you with the attached three (3) forms for your use in your annual reporting to the California Regional Water Quality Control Board, Los Angeles Region, on implementation of your Best Management Practices (BMPs):

**EVIDENCE OF PROGRESS IN IMPLEMENTING  
EARLY ACTION BMPs  
RESIDENTIAL, COMMERCIAL, AND INDUSTRIAL SITES**

**EVIDENCE OF PROGRESS IN IMPLEMENTING  
EARLY ACTION BMPs  
CONSTRUCTION SITES**

**EVIDENCE OF PROGRESS IN IMPLEMENTING  
EARLY ACTION BMPs  
ILLEGAL DISCHARGES/ILLCIT DISPOSAL PRACTICES**

As a reminder, your completed forms are due to us by June 25, 1994, to insure inclusion in our Annual Report.

If there are any questions regarding the Permit compliance effort, please feel free to call me at (818) 458-5948.

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Co-Permittee \_\_\_\_\_

Name \_\_\_\_\_

Date \_\_\_\_\_

Title \_\_\_\_\_

**EVIDENCE OF PROGRESS IN CONTROLLING POLLUTANTS IN  
SURFACE RUNOFF FROM CONSTRUCTION SITES**

**BMP:**

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**STATUS/SCHEDULE OF IMPLEMENTATION:**

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Co-Permittee \_\_\_\_\_

Name \_\_\_\_\_

Date \_\_\_\_\_

Title \_\_\_\_\_

**EVIDENCE OF PROGRESS IN DETECTING AND ELIMINATING  
ILLEGAL DISCHARGES/ILLICIT DISPOSAL PRACTICES**

**BMP:**

**STATUS/SCHEDULE OF IMPLEMENTATION:**

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**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
PERMIT NO. CA0061654-C16948**

Notice is hereby given that in compliance with NPDES Permit No. CA0061654-C16948, a copy of the "Stormwater/Urban Runoff Monitoring Program" is available for public review, Monday through Thursday, 7:30 a.m. to 5:00 p.m., at the Los Angeles County Department of Public Works, Waste Management Division, Stormwater Discharge Program Unit located in the Annex Building, 900 South Fremont Avenue, Alhambra, California 91803-1331. A copy is also available at the California Regional Water Quality Control Board, Los Angeles Regional office, at 101 Centre Plaza Drive, Monterey Park, California 91754-2156. Written comments will be accepted from May 2, 1994, through May 26, 1994. For additional information, please call (818) 458-6972.

The NPDES Permit requires the development of a Stormwater/Urban Runoff Monitoring Program. The Program includes a listing of constituents and parameters to be monitored, monitoring locations, sampling methodology, and frequency of sampling for both wet weather and dry weather flow. Information that influences the design of the Monitoring Program is also discussed in the document. This Monitoring Program addresses Phase II and Phase III regions of the Permit. The Permittees to the NPDES Permit in these two Phases are the County of Los Angeles, the State of California Department of Transportation (Caltrans), as well as the Cities of Alhambra, Arcadia, Artesia, Azusa, Baldwin Park, Bell, Bell Gardens, Bellflower, Bradbury, Burbank, Calabasas, Carson, Cerritos, Claremont, Commerce, Compton, Covina, Cudahy, Diamond Bar, Downey, Duarte, El Monte, El Segundo, Gardena, Glendale, Glendora, Hawaiian Gardens, Hawthorne, Hidden Hills, Huntington Park, Industry, Inglewood, Irwindale, La Cañada Flintridge, La Habra Heights, La Mirada, La Puente, La Verne, Lakewood, Lawndale, Lomita, Long Beach, Los Angeles, Lynwood, Maywood, Monrovia, Montebello, Monterey Park, Norwalk, Palos Verdes Estates, Paramount, Pasadena, Pico Rivera, Pomona, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, Rosemead, San Dimas, San Fernando, San Gabriel, San Marino, Santa Clarita, Santa Fe Springs, Sierra Madre, Signal Hill, South El Monte, South Gate, South Pasadena, Temple City, Torrance, Vernon, Walnut, West Covina, and Whittier.

Si no entiende esta noticia o necesita mas informacion, favor de llamar al numero (818) 458-6972, de lunes a jueves entre 7:00 a.m. y 5:30 p.m.

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April 28, 1994

TO: All Phase II Co-Permittees

FROM: Frank Kuo  
Los Angeles County Department of Public Works

**EARLY ACTION BMP (EABMP) DOCUMENTS**

Enclosed is the EABMP plans from the City of Santa Clarita (City). The submittal from the City was not included in the EABMP document because their submittal was not in the correct format. We were informed later that the delay in submitting a revised document was because of the damages to their City Hall during the earthquake. Because the delay was caused by having to relocate City operations to temporary quarters, we feel that it would be an undue hardship if the City is excluded in the EABMP review process.

We have provided three labels which indicate that the City's EABMP submittal is in a separate document. Please put the labels in the three EABMP documents under the City of Santa Clarita segment and include the attached City of Santa Clarita EABMP in your public review package.

Your cooperation is greatly appreciated.

If you have any questions regarding this matter, please contact me at (818) 458-6989.

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CALIFORNIA QUALITY CONTROL BOARD  
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THOMAS A. TIDEMANSON, Director

# COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

77-21-5  
MP

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

March 16, 1994

IN REPLY PLEASE  
REFER TO FILE WM-3

Mr. Robert P. Ghirelli  
Executive Officer  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Mr. Ghirelli:

### RESPONSE TO COMMENTS ON YOUR DECEMBER 21, 1993 LETTER

During the past several months, we have been working with your staff to resolve the issues noted in your letter of December 21, 1993. The following information details our responses to your concerns.

#### Baseline Best Management Practices

1. You state that the criteria for determining the adequacy of a permittee's legal authority should be 40 Code of Federal Regulation (CFR) Part 122.26(d)(2)(i). A comparison of these provisions with Los Angeles County Code (LACC), Sanitary Sewers and Industrial Waste, Title 20, Division 2; LACC, Flood Control District Property and Facilities, Title 20, Division 5, and County Flood Control Act, Section 13-3/4, indicates that the required legal authority is already provided in the local Ordinances. Copies of these Codes are enclosed for your reference.
2. On July 1, 1992, we provided you with a map of the Santa Monica Bay Drainage Basin (SMBDB) showing the following: streets, city boundaries, drainage area boundaries, and locations of industries by two-digit Standard Industrial Classification (SIC) Code category. Along with this map, a report was provided that summarized by drainage area the total number of industries within each four-digit SIC Code. We understand that this submittal satisfies our obligation under Task 2.1.3 of the Stormwater Permit to provide "SIC categories of facilities in drainage areas."

In addition to the inclusion of stormwater pollution prevention in our on-going industrial waste permit inspection

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TITLE 20

20.92.010

Division 5

FLOOD CONTROL DISTRICT PROPERTY AND FACILITIES<sup>17</sup>

Chapters:

- 20.92 Reservoirs
- 20.94 Channels
- 20.96 Vehicles on Flood Control Levees
- 20.98 Encroachments on Creeks and Channels

Chapter 20.92

RESERVOIRS<sup>19</sup>

Sections:

- 20.92.010 Swimming and wading restrictions.
- 20.92.020 Boating restrictions.
- 20.92.030 Fishing restrictions.
- 20.92.040 Camping, picnicking and parking restrictions.
- 20.92.050 Discharging firearms or fireworks prohibited — Exception.
- 20.92.060 Liability limitations.
- 20.92.070 Violation — Penalty.

20.92.010 Swimming and wading restrictions. A person shall not swim, bathe, wade in, or in any other manner enter into the water of any reservoir, debris basin, or spreading grounds owned by, or under the control of the Los Angeles County Flood Control District, except in those portions of Puddingstone Reservoir which are posted for such use, and then only to the extent of use stated in and within the limits designated by such posting, and then only during such hours of the day and days of the year as may be established and approved by the chief engineer of the Los Angeles County Flood Control District and by the director of parks and recreation, county of Los Angeles. (Ord. 7926 § 1, 1961; Ord. 4700 § 1, 1946).

20.92.020 Boating restrictions. A. A person shall not use any boat, raft or other craft on any reservoir, debris basin or spreading ground owned by or under the control of the Los Angeles County Flood Control District, other than Puddingstone Reservoir and San Gabriel Reservoir, and shall not use any boat, raft or other craft on the Puddingstone Reservoir or San Gabriel Reservoir, unless:

1. Such boat or other craft is registered with the county assessor as required by law; and
2. Prior to placing a boat or other craft on Puddingstone Reservoir, he secures a written permit from the chief engineer of the Los Angeles County Flood Control District; or from the director, department of parks and recreation, county of Los Angeles, acting for and on behalf of the District, and said permit is then in effect; or
3. Prior to placing a boat or other craft on San Gabriel Reservoir when boating is deemed permissible by the chief engineer of the Los Angeles County Flood Control District, he secures a written permit from said chief engineer, and said permit is then in effect.

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any entry or use in the course of duty by any peace or police officer, or by a duly authorized employee of the Los Angeles County Flood Control District. (Ord. 5468 § 2, 1950; Ord. 1549 § 1, 1928.)

→ 20.94.040 Placing obstructions, refuse and contaminating substances in channels prohibited. A. It is unlawful for any person, corporation, municipality, agency, or other entity to place or cause to be placed within a floodway adopted pursuant to Los Angeles County Code, Section 11.60.010, or in the channel, bed, or on the bank of any river, stream, wash or arroyo in the county of Los Angeles, or within the floodplain of said river, stream, wash or arroyo if a floodway has not been adopted, or within or upon any floodway or any flood-control channel, reservoir, debris basin, spreading ground, or any property over which the Los Angeles County Flood Control District has an easement or fee title thereto for flood and/or conservation purposes duly recorded in the office of the county recorder, any wires, fence, building or other structure, or any refuse, rubbish, tin cans or other matter that may impede, retard, or change the normal direction of the flow of the flood, storm, and other waters in such river, stream, wash, arroyo, floodway, floodplain, flood-control channel, reservoir, debris basin or spreading ground, or that may catch or collect debris carried by such waters, or that may be carried downstream by such waters to the damage and detriment of either private or public property within or adjacent to said river, stream, wash, arroyo, floodway, floodplain, flood-control channel, reservoir, debris basin, or spreading ground, nor shall any material, either solid or liquid, be placed in said river, stream, wash, arroyo, floodway, floodplain, flood-control channel, reservoir, debris basin, or spreading ground that will deteriorate the quality of water flowing or stored therein or that which is stored within the water-bearing zones underground.

B. As used herein, "floodplain" means the lowlands adjoining natural watercourses which will be covered by water during flood events. (Ord. 86-0032 § 1, 1986; Ord. 5468 § 3, 1958; Ord. 1549 § 2, 1928.)

20.94.050 Bridges and dip crossings permitted when. This chapter does not prohibit the construction or maintenance of dip crossings of natural drainage courses on private property if such dip crossings:

A. Do not exceed a height of two feet above the adjacent upstream natural stream bed; and

B. Do not change the stream flow characteristics to the detriment of upstream, downstream or adjacent properties; and

C. Are constructed from materials obtained in the adjacent stream bed, except for culvert pipe and asphaltic concrete or portland cement concrete paving. (Ord. 9746 § 1 (part), 1969; Ord. 1549 § 6, 1928.)

20.94.060 Chapter provisions not exclusive. This chapter does not prohibit anything either expressly prohibited or expressly permitted by state law. (Ord. 5468 § 5, 1950; Ord. 1549 § 4, 1928.)

→ 20.94.070 Violation — Penalty. Any person, firm, corporation, municipality or district, or any officer or agent of any firm, corporation, municipality or district violating any of the provisions of this chapter shall be guilty of a misdemeanor; and upon conviction thereof shall be punished by a fine not exceeding \$500.00 or by imprisonment in the County Jail for a term not exceeding 100 days, or by both such fine and imprisonment. (Ord. 1549 § 3, 1928.)

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A. 4463 § 6

WATER UNCODIFIED ACTS

to the provisions of Chapter 4, of Part 2, of Division 11 of the Elections Code if the ordinance calling the election authorizes the consolidation. If the election called pursuant to this section is consolidated with any election, the notice thereof need not set forth the precincts, place, or places of holding the election, or the names of the officers appointed to conduct the election, but may instead state that the precincts, place, or places of holding the election, and officers appointed to conduct the election shall be the same as those provided for such other election within the territory affected by the consolidation and set forth in the ordinance, order, resolution, or notice calling, providing for, or giving notice of such other election and except where consolidation is with a state primary or a state general election, reference shall be made to such ordinance, resolution or notice, by number and title, or date of adoption, or by date or proposed date of publication and the name of the newspaper in which the publication has been or will be made, or by any other definite description.

In all particulars not recited in such ordinance, such election shall be held as nearly as practicable in conformity with the general election laws of the state.

Said board of supervisors shall cause so much of said report as covers a general description of the work to be done, and the map showing the location of the proposed work and improvements, to be printed at least 30 days before the date fixed for such election, and a copy thereof furnished to every qualified elector of said district who shall apply for the same.

Said ordinance calling such election shall, prior to the date set for such election, be published pursuant to Section 6062 of the Government Code in a newspaper of general circulation, printed and published in said district, and designated by said board of supervisors for said purpose. No other notice of such election need be given.

Any defect or irregularity in the proceedings prior to the calling of such election shall not affect the validity of the bonds.

If at such election a majority of the votes cast are in favor of incurring such bonded indebtedness, then bonds of said district for the amount stated in such proceedings shall be issued and sold as in this act provided.

Amended Stats 1971 ch 209 § 1; Stats 1975 ch 360 § 1.

§ 7. Bonds; Prescribing form; Payment; Denominations; Interest; Signatures

The said board of supervisors shall, subject to the provisions of this act, prescribe by ordinance the form of said bonds, and of the interest coupons attached thereto. As to any bond issue authorized pursuant to this act prior to January 1, 1970, the bonds shall be payable substantially in the following manner: A part to be determined by said board, and which shall not be less than one-fortieth part of the whole amount of such indebtedness, shall be payable each and every year on a day and date, and at a place to be fixed by said board, and designate in such bonds, together with the interest on all sums unpaid on such date until the whole of said indebtedness shall have been paid.

As to any bond issue authorized pursuant to this act following January 1, 1970, the board may divide the principal amount of any issue into two or more series and fix different dates for the bonds of each series. The bonds of one series may be made payable at different times from those of any other series; provided, that the earliest maturity of each issue or series, as the case may be shall not be more than two years from the date of the bonds of said issue or series. The final maturity date of any bond shall not exceed 40 years from the date of the bond. Every year beginning with the date of the earliest maturity of each issue or series of bonds, as the case may be, not less than one-fortieth of the whole of the indebtedness evidenced by such issue or such series shall be payable.

The bonds shall be issued in such denominations as the said board of supervisors may determine and shall be payable on the day and at the place fixed in said bonds, and with interest at the rate specified in such bonds, which rate shall not be in excess of 8 per centum per annum, and shall be payable semiannually, and said bonds shall be signed by the chairman of the board of supervisors, and countersigned by the auditor of said Los Angeles County, and the seal of said district shall be affixed thereto. Such signatures and countersignatures may be printed, lithographed, engraved, or otherwise mechanically reproduced, except that one of said signatures or countersignatures to said bonds shall be manually affixed. Any such signature may be affixed in accordance with the provisions of the Uniform Facsimile Signatures of Public Officials Act, Chapter 6 (commencing with Section 5500) of Title 1 of the Government Code. The interest coupons of said bonds shall be numbered consecutively and signed by the auditor of said Los Angeles County by his engraved or lithographed signature. In case any such officer whose signatures or countersignatures appear on the bonds or coupons shall cease to be such officer before the delivery of such bonds to the purchaser, such signature or countersignature shall nevertheless be valid and sufficient for all purposes the same as if such officer had remained in office until the delivery of the bonds.

Amended Stats 1971 ch 209 § 2; Stats 1975 ch 360 § 2.

§ 13<sup>1</sup>/<sub>4</sub>. [Section repealed]

Repealed by Stats 1972 ch 732 § 1.

§ 13<sup>1</sup>/<sub>2</sub>. [Section repealed]

Repealed by Stats 1972 ch 732 § 2.

§ 13<sup>1</sup>/<sub>4</sub>. Acceptance of transfer of storm drain improvements and drainage improvements; Control and jurisdiction; Transfer by city or county; Tax levy for operation, maintenance, repair

The Board of Supervisors of the Los Angeles County Flood Control District shall have power to accept on behalf of said district a transfer and conveyance of storm drain improvements and drainage systems lying within or without the territorial limits of said district, provided that such improvements or systems

benefit property within the territorial limits of the district, whenever the governing body of any public agency owning or exercising jurisdiction over such storm drain and drainage improvements, by resolution describing them, requests the said Los Angeles County Flood Control District to accept the same or when the owner of such storm drain improvement or drainage system tenders a conveyance thereof. Upon such acceptance, the board of supervisors of said district shall thereupon assume sole control and jurisdiction over such storm drain and drainage systems and shall thereafter provide for the operation, maintenance, repair and improvement thereof, except that such flood control district shall not assume or be liable for any bonded indebtedness that may be against the said storm drain or drainage systems. Any city or county within whose limits any storm drain or drainage system has been constructed, and which storm drain or drainage system also lies within the territorial limits of said Los Angeles County Flood Control District, may, by a four-fifths vote of the legislative body of such city or county, transfer and convey to said flood control district any such storm drain or drainage systems for future operation, maintenance, repair and improvement, and upon acceptance of any storm drain improvement under this section the board of supervisors of said flood control district shall have power, and it shall be its duty, to levy a special tax each year upon the taxable real property in said district sufficient to pay the cost and expenses of operating, maintaining, repairing and improving such storm drain and drainage systems so transferred and accepted, excepting only the payment of interest and principal on any outstanding bonds for which the said district shall not be liable. Said special tax shall likewise be levied, collected and expended to pay the cost and expenses of operating, maintaining, repairing and improving all storm drain improvements or drainage systems, or both, constructed by said district with bond funds authorized at any bond election held under the authority of this act. Said tax shall be levied and collected at the same time and in the same manner as the general tax for county purposes, and the revenue derived from said tax shall be paid into the county treasury to the credit of said flood control district and said board of supervisors shall have the power to control and order the expenditure thereof for said purposes. Taxes levied under authority of this section shall be separate and distinct from, and shall be in addition to the taxes authorized to be levied under Section 14 of this act.

Amended by Stats 1972 ch 732 § 3.

§ 15. [Section repealed]

Amended by Stats 1972 ch 141 § 1, Stats 1976 ch 859 § 1, and repealed by Stats 1984 ch 1128 § 78. See Pub Con C §§ 20991-20995.]

§ 15a. [Section repealed]

Repealed by Stats 1984 ch 1128 § 78.3. See Pub Con C § 20997.

§ 15b. [Section repealed]

Amended by Stats 1971 ch 204 § 1 and repealed by Stats 1984 ch 1128 § 79. See Pub Con C § 20996.

§ 16. Powers of board generally; Right of eminent domain

The said board of supervisors of said district shall have power to make and enforce all needful rules and regulations for the administration and government of said district, and to perform all other acts necessary or proper to accomplish the purposes of this act.

Said board of supervisors shall have power to do all work and to construct and acquire all improvements necessary or useful for carrying out any of the purposes of this act; and said board of supervisors shall have power to acquire either within or without the boundaries of said district, by purchase, donation or by other lawful means in the name of said district, from private persons, corporations, reclamation districts, swampland districts, levee districts, protection districts, drainage districts, irrigation districts, or other public corporations or agencies or districts, all lands, rights-of-way, easements, property or materials necessary or useful for carrying out any of the purposes of this act; to make contracts to indemnify or compensate any owner of land or other property for any injury or damage necessarily caused by the exercise of the powers conferred by this act, or arising out of the use, taking or damage of any property, rights-of-way or easements, for any of such purposes; to compensate any reclamation district, protection district, drainage district, irrigation district or other district, public corporation or agency or district, for any right-of-way, easement or property taken over or acquired by said Los Angeles County Flood Control District as a part of its work of flood control or conservation or protection provided for in this act, and any such reclamation district, protection district, drainage district, irrigation district or other district or public corporation or agency is hereby given power and authority to distribute such compensation in any manner that may be now or hereafter allowed by law; to maintain actions to restrain the doing of any act or thing that may be injurious to carrying out any of the purposes of this act by said district, or that may interfere with the successful execution of said work, or for damages for injury thereto, to do any and all things necessary or incident to the powers hereby granted, or to carry out any of the objects and purposes of this act; to require, by appropriate legal proceedings, the owner or owners of any bridge, trestle, wire line, viaduct, embankment or other structure which shall be intersected, traversed or crossed by any channel, ditch, bed of any stream, waterway, conduit or canal, so to construct or alter the same as to offer a minimum of obstruction to the free flow of water through or along any such channel, ditch, bed of any stream, waterway, conduit or canal, and whenever necessary in the case of existing works or structures, to require the removal or alteration thereof for such purpose; provided, however, that nothing in this act contained shall be deemed to authorize said district in exercising any of its powers to take, damage or destroy any property or to require the removal, relocation, alteration or destruction of any bridge, railroad, wire line, pipeline, facility or other structure unless just compensation therefor be first made, in the manner and to the extent required by the Constitution of the United States and the Constitution of California.

The board of supervisors of said district is hereby vested with full power to do all other acts or things necessary or useful for the promotion of the work of the control of the flood and storm waters of said

LOS ANGELES COUNTY CODE

TITLE 20

UTILITIES

DIVISION 2

SANITARY SEWERS  
AND INDUSTRIAL WASTE

The provisions codified in this title reflect changes made by all  
county ordinances up to and including:

Division 2 - Ordinance 89-0101, passed July 27, 1989

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20.20.340	Sewage.
20.20.345	Sewer disposal.
20.20.350	Sewage dumping plant.
20.20.360	Shall and may.
20.20.361	STEP system.
20.20.365	Standard Industrial Classification.
20.20.370	Tapping.
20.20.380	Tee or T.
20.20.390	Trunk sewer.
20.20.395	Uncontrolled discharge.
20.20.400	Waste disposal facility.
20.20.410	Water pollution control plant.
20.20.420	Wye or Y.

**20.20.010** Definitions applicable to Division 2. The definitions in this chapter shall govern the construction of this Division 2 of Title 20, and any permits issued thereunder unless otherwise apparent from the context. (Ord. 6130 Part 2 § 2001, 1952.)

**20.20.015** Act. "Act" means the Federal Water Pollution Control Act, also known as the Clean Water Act, as amended, 33 U.S.C. 1251, et seq. (Ord. 89-0101 §1, 1989)

**20.20.020** Board. "Board" means the board of supervisors of the county of Los Angeles. (Ord. 6130 Part 2 § 2002, 1952.)

**20.20.030** Cesspool. "Cesspool" means and is a lined excavation in the ground which receives the discharge of a drainage system, or part thereof, so designed as to retain the organic matter and solids discharging therein, but permitting the liquids to seep through the bottom and sides, and constructed pursuant to the provisions of the Plumbing Ordinance set out at Title 28 of this code. (Ord. 6130 Part 2 § 2004, 1952.)

**20.20.040** Chief engineer. "Chief engineer" means the chief engineer of the County Sanitation District, the Municipal Water District or County Water District that owns and operates public sanitary sewerage facilities, or the County Flood Control District, or his authorized deputy, agent or representative. The district referred to shall be that one stipulated by the context. (Ord. 9119 § 1 (part), 1966; Ord. 6130 Part 2 § 2005, 1952.)

**20.20.050** Chimney. "Chimney" means a vertical section of a sewer pipe extending either from a vertical tee set 90 degrees to the main line or from a long-radius one-quarter bend set vertically at the curb of property line, and in either case suitably reinforced with concrete. (Ord. 8690 § 2 (part), 1964; Ord. 6130 Part 2 § 2006, 1952.)

**20.20.060** County. "County" means the county of Los Angeles. (Ord. 6130 Part 2 § 2008, 1952.)

**20.20.070** County Engineer. "County Engineer" means the Director of Public Works of the County of Los Angeles, or his authorized deputy, agent, representative or inspector. (Ord. 89-0101 §2, 1989; Ord. 6130 Part 2 §2009, 1952)

**20.20.080** County health officer. "County health officer" means the director of health services of the county of Los Angeles, or his authorized deputy, agent, representative or inspector. (Ord. 6130 Part 2 § 2010, 1952.)



**20.20.090 Dairy wastes.** "Dairy wastes" means the waste liquids incident to operation of a dairy, including wash water from the milking barn, milk house, bottle washing equipment, and similar devices. (Ord. 6130 Part 2 § 2012, 1952.)

**20.20.095 Director.** "Director" means the Director of Public Works of the County of Los Angeles, or his authorized deputy, agent, representative or inspector. (Ord. 89-0101 §3, 1989)

**20.20.100 Domestic sewage.** "Domestic sewage" means the waterborne wastes derived from ordinary living processes, and of such character as to permit satisfactory disposal, without special treatment, into the public sewer or by means of a private sewage disposal system. (Ord. 6130 Part 2 § 2014, 1952.)

**20.20.110 Effluent.** "Effluent" means the liquid flowing out of any treatment plant or facility constructed and operated for the partial or complete treatment of sewage or industrial waste. (Ord. 7519 § 1 (part), 1959; Ord. 6130 Part 2 § 2015, 1952.)

**20.20.115 Septic tank effluent.** "Septic tank effluent" is effluent from private septic tanks and shall be considered, for the purposes of this chapter involving the discharge of septic tank effluent to a Septic Tank Effluent Pumping pressure sewer system (STEP), the same as industrial waste. Whenever this chapter refers to industrial waste, the reference shall include septic tank effluent. (Ord. 89-0006 § 2, 1989.)

**20.20.117 EPA.** "EPA" means the United States Environmental Agency. (Ord. 89-0101 §4, 1989)

**20.20.120 Frontage.** "Frontage" means the length or width in feet applied to a lot based on the benefit received from the abutting sewer, as determined by the county engineer. (Ord. 8690 § 2 (part), 1964; Ord. 6982 § 2, 1956; Ord. 6130 Part 2 § 2015.1, 1952.)

**20.20.130 House lateral.** "House lateral" means that part of the sewer piping within the street or right-of-way which extends from the property or sewer right-of-way line to a construction with the main-line sewer. (Ord. 8690 § 2 (part), 1964; Ord. 6130 Part 2 § 2016, 1952.)

**20.20.135 Indirect discharge.** "Indirect discharge" or "discharge" into a sewer means the introduction of pollutants into a POTW from any non-domestic source regulated under Section 307(b), (c) or (d) of the Act. (Ord. 89-0101 §5, 1989)

**20.20.140 Industrial building.** "Industrial building" means any building, structure or works which is, or which is designed to be used for the manufacture, processing or distribution of materials, equipment, supplies, food or commodities of any description; or which is used or designed to be used as a school, sanitarium, hospital, penal institution or charitable institution, together with all appurtenances thereto and the surrounding premises under the same ownership or control. (Ord. 6130 Part 2 § 2017, 1952.)

**20.20.150 Industrial connection sewer.** "Industrial connection sewer" means that part of the sewer piping within the street or right-of-way which extends from the property or sewer right-of-way line to a connection with the main-line sewer through which is discharged industrial waste. (Ord. 8690 § 2 (part), 1964; Ord. 7519 § 1 (part), 1959; Ord. 6130 Part 2 § 2018, 1952.)

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20.20.155 Industrial user. "Industrial user" or "user" means a source of indirect discharge. (Ord. 89-0101 §6, 1989)

20.20.160 Industrial waste. "Industrial waste" means any and all waste substances, liquid or solid, except domestic sewage, and includes among other things radioactive wastes and explosive, noxious or toxic gas when present in the sewage system. (Ord. 6130 Part 2 § 2019, 1952.)

20.20.170 Industrial waste treatment facility. "Industrial waste treatment facility" means any works or device for the treatment, storage or control of industrial waste within a site prior to disposal. (Ord. 11716 § 1, 1978; Ord. 6982 § 3 (part), 1956; Ord. 6130 Part 2 § 2021, 1952.)

20.20.180 Inspector. "Inspector" means the authorized inspector, deputy, agent or representative of the county engineer. (Ord. 6130 Part 2 § 2022, 1952.)

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**20.20.190 Interceptor.** "Interceptor" means and is a device designed and installed so as to separate and retain deleterious, hazardous or undesirable matter from wastes. (Ord. 6130 Part 2 § 2023, 1952.)

**20.20.195 Interference.** "Interference" means a discharge which, alone or in conjunction with a discharge or discharges from other sources:

(A) inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and

(B) is therefore a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent state or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) including Title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including state regulations contained in any sludge management plan prepared pursuant to Subtitle D of the SWDA), the Clean Air Act, and the Marine Protection, Research and Sanctuaries Act. (Ord. 89-0101 §7, 1989)

**20.20.222 National Categorical Pretreatment Standard.** "National Categorical Pretreatment Standard", "NCPS", "National Pretreatment Standard", "Pretreatment Standard", or "Standard" means any regulation containing pollutant discharge limits promulgated by the EPA in accordance with Section 307 (b) and (c) of the Act which applies to industrial users. This term includes prohibitive discharge limits established pursuant to Section 403.5 of Title 40 of the Code of Federal Regulations. (Ord. 89-0101 §8, 1989)

**20.20.200 Licensed contractor.** "Licensed contractor" means a contractor having a valid license issued pursuant to Chapter 9, Division 3, of the Business and Professions Code, state of California, which license includes the activities listed on the permit applied for. (Ord. 6982 § 3 (part), 1956; Ord. 6130 Part 2 § 2024, 1952.)

**20.20.210 Lot.** "Lot" means any piece or parcel of land bounded, defined or shown upon a map or deed recorded or filed in the office of the county recorder of Los Angeles County; provided, however, that in the event any building or structure covers more area than a lot as defined above, the term "lot" shall include all such pieces or parcels of land upon which said building or structure is wholly or partly located together with the yards, courts and other unoccupied spaces legally required for the building or structure. (Ord. 10020 § 3 (part), 1970; Ord. 6130 Part 2 § 2025, 1952.)

**20.20.220 Main-line sewer.** "Main-line sewer" means any public sewer in a dedicated right-of-way in which changes in alignment and grade occur only at manholes, or where angle points or curves between manholes have been approved by the county engineer. Such sewers are generally eight inches or more in diameter. (Ord. 6982 § 3 (part), 1956; Ord. 6130 Part 2 § 2026, 1952.)

**20.20.224 New source.** "New source" means any building, structure, facility, or installation from which there is or may be a discharge of pollutants, the construction of which commenced after the publication of proposed pretreatment standards under Section 307 (c) of the Act applicable to such source. (Ord. 89-0101 §9, 1989)

**20.20.225 NPDES permit.** "NPDES permit" means a National Pollution Discharge Elimination System permit issued pursuant to Section 402 of the Act. (Ord. 89-0101 §10, 1989)

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**20.20.226 Off-site Disposal.** "Off-site Disposal" means the disposal or removal of industrial wastes or other materials regulated by this Division to a site other than the premises where the wastes were generated whether or not such site is under the control of the industrial waste permittee. (Ord. 89-0101 §11, 1989)

**20.20.228 On-site disposal.** "On-site disposal" means the management, treatment, control or disposal, other than to the public sewer system, of industrial wastes or other materials within the premises named in an industrial waste disposal permit whether or not the wastes were generated at the permitted site or by the permittee. (Ord. 89-0101 §12, 1989)

**20.20.230 Ordinance.** "Ordinance" means an ordinance of the county of Los Angeles. (Ord. 6130 Part 2 § 2027, 1952.)

**20.20.235 Pass through.** "Pass through" means a discharge which exits the POTW into the waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation). (Ord. 89-0101 §13, 1989)

**20.20.240 Permittee.** "Permitter" means the person to whom a permit has been issued pursuant to the provisions of this Division 2 of Title 20. (Ord. 6130 Part 2 § 2028, 1952.)

**20.20.250 Person.** "Person" means an individual human being, a firm, partnership or corporation, his or their heirs, executors, administrators, assigns, officers or agents, the county of Los Angeles, and any municipal, quasi-municipal or government agency, or district or officers thereof. (Ord. 6130 Part 2 § 2029, 1952.)

**20.20.260 Pollution of underground or surface waters.** "Pollution of underground or surface waters" means affecting the chemical, physical, biological and radiological integrity of such waters by man-made or man-induced activities. (Ord. 89-0101 §14, 1989; Ord. 6130 Part 2 §2030, 1952)

**20.20.262 Publicly Owned Treatment Works.** "Publicly Owned Treatment Works" or "POTW" means a treatment works as defined by Section 212 of the Act, which is owned by a state or municipality (as defined by Section 502 (4) of the Act). This definition includes any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or industrial wastes of a liquid nature. It also includes sewers, pipes and other conveyances only if they convey wastewater to a POTW treatment plant. For the purpose of this Division, POTW shall also include any sewers that convey wastewaters to the POTW from outside the municipality by contract. (Ord. 89-0101 §15, 1989)

**20.20.264 Pretreatment.** "Pretreatment" or "treatment" means the reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater to a less harmful state prior to or in lieu of discharging or otherwise introducing such pollutants into a POTW or other disposal facility. The reduction or alteration can be obtained by physical, chemical or biological processes or process changes by use of an industrial waste treatment facility or other means, except as prohibited by 40 CFR Section 403.6(d). (Ord. 89-0101 §16, 1989)

**20.20.270 Public sewer.** "Public sewer" means a main-line sanitary sewer, dedicated to public use. (Ord. 6130 Part 2 § 2031, 1952.)

**20.20.280 Radioactive material.** "Radioactive material" is defined to be any material composed of or containing chemical elements which spontaneously change their atomic structure by the emission of alpha or beta particles or gamma rays or any other particles or rays or forms of energy. (Ord. 6130 Part 2 § 2032, 1952.)

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**20.20.290 Rainwater diversion system.** "Rainwater diversion system" means any device designated to prevent the entry of stormwaters into the public sewer system or other waste disposal or treatment systems, and to redirect storm flows to appropriate areas. (Ord. 11716 § 3, 1978; Ord. 6130 Part 2 § 2032.1, 1952.)

**20.20.300 Saddle. A.** "Wye saddle" means a short pipe-fitting with a shoulder at one end to allow the application of the fitting to a hole tapped in the main-line sewer such that the short pipe shall form a 45-degree angle from the main-line sewer pipe.

**B.** "Tee saddle" means a short pipe-fitting with a shoulder at one end to allow the application of the fitting to a hole tapped in the main-line sewer such that the short pipe shall form a 90-degree angle from the main-line sewer pipe. (Ord. 11716 § 2, 1978; Ord. 6982 § 4 (part), 1956; Ord. 6130 Part 2 § 2032.2, 1952.)

**20.20.310 Section.** "Section" means a section of the ordinance codified in this Division 2, unless some other ordinance or statute is mentioned. (Ord. 6130 Part 2 § 2033, 1952.)

**20.20.320 Seepage pit.** "Seepage pit" means a line-excavation in the ground which receives the discharge of a septic tank, so designed as to permit the effluent from the septic tank to seep through its bottom and sides. (Ord. 6130 Part 2 § 2034, 1952.)

**20.20.330 Septic tank.** "Septic tank" means a watertight receptacle which receives the discharge from a sewerage system, designed and constructed so as to retain solids, digest organic matter through a period of detention, and allow the liquids to discharge into the soil outside of the tank through a drainfield system or one or more seepage pits. (Ord. 8690 § 3 (part), 1964; Ord. 6130 Part 2 § 2034.1, 1952.)

**20.20.340 Sewage.** "Sewage" means any waterborne or liquid wastes, including domestic sewage and industrial waste, but does not include or mean stormwater, groundwater, roof or yard drainage. (Ord. 7519 § 3 (part), 1959; Ord. 6130 Part 2 § 2035, 1952.)

**20.20.345 Sewer disposal.** "Sewer disposal" means the disposal of industrial wastes or other materials into the public sewer system by means of a direct connection to the public sewer system from the premises named in an industrial waste disposal permit. (Ord. 89-0101 §17, 1989)

**20.20.350 Sewage pumping plant.** "Sewage pumping plant" means any works or device used to raise sewage from a lower to a higher level or to overcome friction in a pipeline. (Ord. 6130 Part 2 § 2036, 1952.)

**20.20.360 Shall and may.** "Shall" is mandatory and "may" is permissive. (Ord. 6130 Part 2 § 2038, 1952.)

**20.20.361 STEP system.** "STEP system" means a Septic Tank Effluent Pumping system which is a public sewer system, operating under pressure and especially designed to receive effluent from private septic tanks. (Ord. 89-0006 § 4, 1989.)

**20.20.365 Standard Industrial Classification.** "Standard Industrial Classification" or "SIC" means a classification pursuant to the Standard Industrial Classification Manual issued by the Executive Office of the President, Office of Management and Budget, 1972, as amended. (Ord. 89-0101 §18, 1989)

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**20.20.370 Tapping.** "Tapping" means the forming of a tee or wye branch connection to a main-line sewer by installing a tee or wye saddle after the sewer is in place. (Ord. 6982 § 4 (part), 1956; Ord. 6130 Part 2 § 2039.1, 1952.)

**20.20.380 Tee or T.** "Tee" or "T" means a fitting for a branch on which the spur joins the barrel of the pipe at an angle of approximately 90 degrees. (Ord. 6130 Part 2 § 2040, 1952.)

**20.20.390 Trunk sewer.** "Trunk sewer" means a sewer under the jurisdiction of a public entity other than the county of Los Angeles. (Ord. 6130 Part 2 § 2041, 1952.)

**20.20.395 Uncontrolled discharge.** "Uncontrolled discharge" means any discharge, intentional or accidental, occurring in such a manner that the discharger is unable to determine or regulate the quantity, quality or effects of the discharge. (Ord. 89-0101 §19, 1989)

**20.24.090 Inspection to ascertain compliance - Access required.** Acceptance of permit conditions.

(A) The Director may inspect, as often as he deems necessary, every main-line sewer, sewage pumping plant, water pollution control plant, industrial waste pretreatment plant or facility, industrial sewer connection, interceptor, dairy screen-chamber, neutralization basin, waste disposal facility, or other similar appurtenances to ascertain whether such facilities are maintained and operated in accordance with the provisions of this Division 2. All persons shall permit and provide the Director with access to all such facilities at reasonable times.

(B) An applicant, by accepting a permit issued pursuant to this Division 2 does thereby consent and agree to entry upon the premises described in the permit by the Director at all reasonable times for the purpose of:

**20.20.395 Uncontrolled discharge.** "Uncontrolled discharge" means any discharge, intentional or accidental, occurring in such a manner that the discharger is unable to determine or regulate the quantity, quality or effects of the discharge. (Ord. 89-0101 §19, 1989)

**20.20.400 Waste disposal facility.** "Waste disposal facility" means any dump, solid waste disposal site, transfer station, sanitary landfill, land reclamation project, incinerator (except household incinerators and wood refuse to be burned in a suitable furnace), or other similar site or facility which is used or intended to be used for the acceptance for transfer, salvage or disposal of rubbish, garbage or industrial waste, whether liquid or solid. (Ord. 11716 § 6, 1978; Ord. 6130 Part 2 § 2041.1, 1952.)

**20.20.410 Water pollution control plant.** "Water pollution control plant" means any works or device for treating sewage except any industrial waste treatment facility, and except any private sewage disposal system covered by the Plumbing Code set out at Title 28 of this code. (Ord. 11716 § 5, 1978; Ord. 8690 § 2 (part), 1964; Ord. 6130 Part 2 § 2041.2, 1952.)

**20.20.420 Wye or Y.** "Wye" or "Y" means a fitting for a branch on which the spur joins the barrel of the pipe at an angle of approximately 45 degrees. (Ord. 6130 Part 2 § 2042, 1952.)



**20.24.040** References to additions and amendments. Whenever reference is made to any portion of the ordinance codified in this Division 2, such reference applies to all amendments and additions thereto now or hereafter made. (Ord. 6130 Part 3 § 3001, 1952.)

**20.24.050** Time limits — Extension permitted when. Any time limit provided for in the provisions of this Division 2 may be extended by mutual written consent of both the officer or department concerned and the permittee or applicant, or other person affected. (Ord. 7519 § 3 (part), 1959; Ord. 6130 Part 3 § 3009, 1952.)

**20.24.060** Water pollution control facilities — Standards. Water pollution control plants and facilities shall be designed so as to produce an effect which will not pollute underground or surface waters, create a nuisance, or menace the public peace, health or safety. The county engineer shall consult with the State Regional Water Quality Control Board, health officers and officials of industrial and public agencies, and from time to time promulgate standards which may vary according to location, topography, physical conditions, and other pertinent factors. (Ord. 11716 § 7, 1978; Ord. 8690 § 3 (part), 1964; Ord. 6130 Part 3 § 3005, 1952.)

**20.24.070** Maintenance of facilities — Applicability of provisions. A. The requirements contained in Division 2 of this Title 20 covering the maintenance of water pollution control plants, sewage pumping plants, industrial waste pretreatment plants, dairy screen-chambers, waste disposal facility interceptors, or other appurtenances, shall apply to all such facilities now existing or hereafter constructed. All such facilities shall be maintained by the owners thereof in a safe and sanitary condition, and all devices or safeguards which are required by this Division 2 for the operation of such facilities shall be maintained in good working order.

B. This section shall not be construed as permitting the removal or non-maintenance of any devices or safeguards on existing facilities unless authorized in writing by the county engineer. (Ord. 11716 § 9, 1978; Ord. 8690 § 3 (part), 1964; Ord. 7519 § 3 (part), 1959; Ord. 6130 Part 3 § 3014, 1952.)

**20.24.080** Maintenance of sewers and laterals. All house laterals, industrial connection sewers, septic tank outlet connections to STEP system, and appurtenances thereto existing as of January 23, 1953, or thereafter constructed, shall be maintained by the owner of the property served in a safe and sanitary condition, and all devices or safeguards which are required by this Division 2 for the operation thereof shall be maintained in good working order. For septic tanks connected to a STEP system, the limits of maintenance responsibility are: a) the septic tank and its outlet pipe up to the point of connection to the STEP pumping unit wet well shall be maintained by the owner of the property served; b) the STEP pumping unit, wet well, pumped discharge piping and mainlines shall be maintained by the public agency established for that purpose; and c) the costs of the electrical power for the STEP pump shall be paid by the owner of the property served. (Ord. 89-0006 § 5, 1989; Ord. 6130 Part 3 § 3015, 1952.)

**20.24.090** Inspection to ascertain compliance - Access required. Acceptance of permit conditions.

(A) The Director may inspect, as often as he deems necessary, every main-line sewer, sewage pumping plant, water pollution control plant, industrial waste pretreatment plant or facility, industrial sewer connection, interceptor, dairy screen-chamber, neutralization basin, waste disposal facility, or other similar appurtenances to ascertain whether such facilities are maintained and operated in accordance with the provisions of this Division 2. All persons shall permit and provide the Director with access to all such facilities at reasonable times.

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(B) An applicant, by accepting a permit issued pursuant to this Division 2 does thereby consent and agree to entry upon the premises described in the permit by the Director at all reasonable times for the purpose of:

1. Inspection, sampling, flow measurement or examination of records;

2. Placing on the premises devices for monitoring, flow measurement or metering;

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3. Inspecting and copying any records, reports, test results or other information required to carry out the provisions of this Division 2; and

4. Photographing any waste, waste container, vehicle, waste treatment process, discharge location, or violation discovered during an inspection. (Ord. 89-0101 §20, 1989; Ord. 11716 §8, 1987; Ord. 8690 §3 (Part), 1964; Ord. 7519 §3 (Part), 1959; Ord. 6130 Part 3 §3011, 1952)

**20.24.100 Enforcement — County engineer powers.** The county engineer shall enforce all the provisions of this Division 2, and for such purpose shall have the powers of a peace officer. Such powers shall not limit or otherwise affect the powers and duties of the county health officer. (Ord. 6130 Part 3 § 3004, 1952.)

**20.24.110 Delegation of powers.** Whenever a power is granted to or a duty is imposed upon the county engineer, the county health officer or other county officer by provisions of this Division 2, the power may be exercised or the duty may be performed by a deputy of the officer or a person authorized pursuant to law by the officer, unless this Division 2 expressly provides otherwise. (Ord. 6130 Part 3 § 3002, 1952.)

**20.24.120 Identification for inspectors and maintenance personnel.** The county engineer shall provide means of identification of inspectors and sewer maintenance men which shall identify them as such. Inspectors and sewer maintenance men shall identify themselves upon request, when entering upon the work of any contractor or property owner for any inspection or work required by this Division 2. (Ord. 6130 Part 3 § 3010, 1952.)

**20.24.130 Notice service procedures.** Unless otherwise provided in this Division 2, any notice required to be given by the county engineer under this division shall be in writing, and served in the manner provided in the Code of Civil Procedure for the service of process, or by registered or certified mail. If served by mail, the notice shall be sent to the last address known to the county engineer. Where the address is unknown, service may be made as above provided upon the owner of record of the property. (Ord. 7519 § 3 (part), 1959; Ord. 6130 Part 3 § 3008, 1952.)

**20.24.140 Obstructing access to facilities prohibited.** No object, whether a permanent structure, or a temporary structure, or any object which is difficult of removal, shall be located on a sewer easement or placed in such a position as to interfere with the ready and easy access to any facility described in Section 20.24.090. Any such obstruction, upon request of the county engineer, shall be immediately removed by the violator at no expense to the county, and shall not be replaced. (Ord. 9119 § 1 (part), 1966; Ord. 6130 Part 3 § 3012, 1952.)

**20.24.150 Interference with inspectors prohibited when.** No person in the unincorporated area of the county shall, during reasonable hours, refuse, resist or attempt to resist the entrance of the county engineer into any building, factory, plant, yard, field or other place or portions thereof in the performance of his duty within the power conferred upon him by law or by Division 2 of this Title 20. (Ord. 6130 Part 3 § 3013, 1952.)

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20.24.160 Violation - Penalty. Every person violating any provision of this Division 2 or any condition or limitation of permit issued pursuant thereto is guilty of misdemeanor, and upon conviction is punishable by fine not exceeding \$1,000.00 or by imprisonment in the County Jail for a period not exceeding six months, or by both such fine and imprisonment. (Ord. 89-0100 §21, 1989; Ord. 7519 §3 (Part), 1959; Ord. 6130 Part 3 §3006, 1952).

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**20.24.170 Continued violations.** Each day during which any violation described in this Division 2 as wilful continues shall constitute a separate offense punishable as provided by this division. (Ord. 6130 Part 3 § 3007, 1952.)

**20.24.175 Injunctive Relief.** The Director may seek injunctive relief for noncompliance with any provision of this Division 2 or the conditions and limitations of any permit issued pursuant to this Division 2. (Ord. 89-0101 §22, 1989)

**20.24.180 Severability.** If any provision of the ordinance codified in this Division 2, or the application thereof to any person or circumstance is held invalid, the remainder of the ordinance and the application of such provisions to other persons or circumstances shall not be affected thereby. (Ord. 6130 Part 3 § 3003, 1952.)

**20.24.190 Discharges to STEP sewer systems.** No person shall make or allow any discharge of any material to a STEP sewer system for which he or she does not have a valid discharge permit pursuant to this Division 2 and to Section 20.36.040. (Ord. 89-0006 § 6, 1989.)

**20.24.200 Notification of uncontrolled discharges required.**

(A) In the event of an uncontrolled discharge, the discharger or permittee shall immediately notify the Director of the incident by telephone. The notification shall include location of discharge, type of material, concentration and volume, and corrective actions taken.

(B) Within ten (10) days after the uncontrolled discharge, the discharger or permittee shall submit to the Director a detailed written report describing the cause of the discharge, corrective action taken and measures to be taken to prevent future occurrences. Such notification shall not relieve the discharger or permittee of liability or fines incurred as a result of the uncontrolled discharge. (Ord. 89-0101 §23, 1989)

**20.24.210 Confidential Information - Public access.** Information and data concerning an industrial user obtained from reports, questionnaires, permit applications, permits, monitoring programs and inspections shall be available to the public or other governmental agency without restriction unless the user specifically requests and is able to demonstrate to the satisfaction of the Director that the release of such information would divulge information, processes or methods of production entitled to protection as trade secrets of the user. Wastewater constituents and characteristics will not be recognized as confidential information. (Ord. 89-0101 §24, 1989)



conform with the requirements of the applicable state laws, shall include the establishment of a reimbursement district and collection rates to be applied, and shall provide that notice be published inviting sealed bids on the work proposed and that the bids be publicly opened.

B. The procedure for the receipt of bids and the award of contract for work to be done by a special assessment district or any public agency directly controlled by state law shall be as required by the particular laws applicable; for all other projects, the county engineer shall receive and analyze the bids, and authorize the principals involved to award the contract to the lowest responsible bidder. In the event that the low bid received exceeds the engineer's estimate by more than 10 percent, the county engineer shall notify the principals involved of the increase over the estimated cost. If the principals involved and the county engineer agree, the contract may be awarded to the lowest responsible bidder, otherwise all bids shall be rejected and the proposal readvertised for new bids. (Ord. 10020 § 3 (part), 1970; Ord. 9119 § 1 (part), 1966; Ord. 8690 § 5, 1964; Ord. 6130 Part 4 § 4007.1, 1952.)

**20.28.060 Certificate of final inspection — Conditions.** When it appears to the satisfaction of the county engineer that all work done under the permit has been constructed according to and meets the requirements of all the applicable provisions of this Division 2, and that all fees have been paid, the county engineer, if requested, shall cause to be issued to the permittee constructing such work a certificate of final inspection. The certificate shall recite that such work as is covered by the permit has been constructed according to this Division 2, and that said work is in an approved condition. (Ord. 6982 § 5 (part), 1956; Ord. 6130 Part 4 § 4009, 1952.)

**20.28.070 Refund procedures.** A. In the event that any person shall have paid a fee as required under the sections set forth below and no work or processing has been done on these functions by the county engineer and the project has been formally abandoned or cancelled, such person, upon presentation to the county engineer of a request in writing, on special provided forms, shall be entitled to a refund in an amount to 80 percent of the fee actually paid:

Section	Type of Fee
20.32.120	Sewer construction permit fees — Table I
20.32.200	Tap fee
20.32.210	Manhole reconstruction inspection charges
20.32.230	Plan checking fees
20.32.240	Sewer easement processing fees
20.32.250	Special studies — Preparation and checking fees
20.32.260	Reimbursement processing fees
20.32.280	Charges for sewer maintenance
20.36.230	Industrial waste disposal permit: — Application fee — Schedule.

B. In the event that the county engineer has commenced any plan checking or other work for which a fee was paid, or the contractor has commenced work on the construction, no portion of the fee shall be refunded.

C. Refund requests must be submitted within a one-year period after the date the fee was paid.

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## Chapter 20.32

## SANITARY SEWERS

## Parts:

1. Sewer Construction Permit
2. Fees and Deposits
3. Design Standards
4. Inspection
5. Maintenance

## Part 1

## SEWER CONSTRUCTION PERMIT

## Sections:

- |           |  |
|-----------|--|
| 20.32.010 | Required when — Period of validity.                              |
| 20.32.020 | Not required when.   |
| 20.32.030 | Application — Form and contents.                                 |
| 20.32.040 | Plan approval prerequisite to issuance.                          |
| 20.32.050 | Tapping fee payment required when.                               |
| 20.32.060 | Permit from other agencies required when.                        |
| 20.32.070 | Requirements for pumping and treatment plants.                   |
| 20.32.080 | Excessive discharge of sewage — Conditional permit requirements. |
| 20.32.090 | Permit for use of temporary facilities — Conditions.             |
| 20.32.100 | Nontransferability of permits.                                   |

**20.32.010 Required when — Period of validity.** A. No person other than the person specifically excepted by this Division 2 shall commence, do or cause to be done, construct or cause to be constructed, use or cause to be used, alter or cause to be altered any public sewer, main-line sewer, house lateral, sewage pumping plant, water pollution control plant, or other similar appurtenance in the county of Los Angeles without first obtaining a sewer construction permit from the county engineer.

B. A sewer construction permit issued by the county engineer shall expire one year from the date of issuance, except when the plans were approved in accordance with an agreement either with another governmental agency, or with the county for a subdivision as required by the Subdivision Ordinance set out at Title 21 of this code, or reimbursement in accordance with Section 20.28.050, the permit shall be valid for the period specified in the agreement. (Ord. 11716 § 13, 1978; Ord. 10020 § 3 (part), 1970; Ord. 8690 § 6 (part), 1964; Ord. 6130 Part 5 Ch. 1 § 5101, 1952.)

**20.32.020 Not required when.** The provisions of this Division 2 requiring permits shall not apply to contractors constructing public sewers and appurtenances under contracts awarded by the board and entered into under proceedings had or taken pursuant to any of the special procedure statutes of this state providing



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for the construction of sewers and the assessing of the expense thereof against the lands benefited thereby, or under contracts between the contractor and board of supervisors. (Ord. 8023 § 2, 1961: Ord. 6130 Part 5 Ch. 1 § 5102, 1952.)

**20.32.030 Application — Form and contents.** A. Any person requiring a sewer construction permit shall make written application to the county engineer.

B. The county engineer shall provide printed application forms for the permits provided for by this Division 2, indicating thereon the information to be furnished by the applicant. The county engineer may require, in addition to the information furnished by the printed form, any additional information from the applicant which will enable the county engineer to determine that the proposed work or use complies with the provisions of this Division 2. (Ord. 8690 § 6 (part), 1964: Ord. 6130 Part 5 Ch. 1 § 5104, 1952.)

**20.32.040 Plan approval prerequisite to issuance.** No sewer construction permit shall be issued until the county engineer has checked and approved the plans in accordance with Section 20.32.420 and the other applicable provisions of this Division 2. (Ord. 10020 § 3 (part), 1970: Ord. 8690 § 6 (part), 1964: Ord. 6130 Part 5 Ch. 1 § 5108, 1952.)

**20.32.050 Tapping fee payment required when.** A. When, in the opinion of the county engineer, it is necessary to connect a house lateral to a public sewer at a point where no connection facility has been provided, application for a public sewer tap shall be submitted and a fee for tapping the public sewer shall be paid by the applicant before the permit is issued for the construction of the house lateral. All tapping of public sewers, except trunk sewers, shall be performed by the county engineer.

B. Exception: Tapping of the public sewer as required on sewer plans approved by the county engineer shall be constructed by a licensed contractor. (Ord. 6982 § 5 (part), 1956: Ord. 6130 Part 5 Ch. 1 § 5105, 1952.)

**20.32.060 Permit from other agencies required when.** Before granting any permit for the construction, installation, repair or removal of any sewer, or appurtenances thereto, which will necessitate any excavation or fill, in, upon or under any public street, highway or right-of-way under the jurisdiction of another public agency, the county engineer shall require the applicant to first obtain a permit from the agency having jurisdiction. (Ord. 10020 § 3 (part), 1970: Ord. 8690 § 6 (part), 1964: Ord. 6130 Part 5 Ch. 1 § 5106, 1952.)

**20.32.070 Requirements for pumping and treatment plants.** Before granting a permit for the construction of any sewage pumping plant or water pollution control plant, the county engineer shall check and approve the plans or required modification thereof as to their compliance with county, state and other governmental laws or ordinances, and shall require that the facilities be adequate in every respect for the use intended. (Ord. 8690 § 3 (part), 1964: Ord. 6130 Part 5 Ch. 1 § 5109, 1952.)

**20.32.080 Excessive discharge of sewage — Conditional permit requirements.** A. Any person proposing to have sewage discharged from any property to a public sewer in quantities or at a rate greater than the capacity for which the sewer



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stated time limit for the use of such temporary system, and shall provide for the termination of such use and the connection to the guaranteed permanent sewage disposal system;

E. A cash deposit in an amount established by the county engineer has been deposited with the county engineer to insure the satisfactory maintenance of the temporary sewage disposal system;

F. Provision has been made for the inclusion of the area served by the temporary sewage disposal system in a sewer maintenance district or other taxing entity capable of generating adequate maintenance and operational funds in the event that public operation of the temporary system should become necessary. (Ord. 10757 § 1, 1973; Ord. 6130 Part 5 Ch. 1 § 5111, 1952.)

**20.32.100 Nontransferability of permits.** Permits issued under Part 1 of this chapter are not transferable from one person to another person or from one location to another location. (Ord. 6130 Part 5 Ch. 1 § 5103, 1952.)

**Part 2**

**FEES AND DEPOSITS**

**Sections:**

- 20.32.110 Connection to public sewer — Payment of fees required.
- 20.32.120 Sewer construction permit fees — Table 1.
- 20.32.130 Connection charges — Designated.
- 20.32.140 Connection charges — Sewers constructed under federal aid exempt.
- 20.32.150 Area and connection charges in reimbursement districts.
- 20.32.160 Reduction of charges for payments to other entities.
- 20.32.170 Connections to trunk sewers — Permit requirements.
- 20.32.180 Sewer connection permit — Determination of capacity — Agreement on future assessments.
- 20.32.190 Sewer connection permit — Charges for portions of property.
- 20.32.200 Tap fee.
- 20.32.210 Manhole reconstruction inspection charges.
- 20.32.220 Future assessments for additional benefits.
- 20.32.230 Plan checking fees.
- 20.32.240 Sewer easement processing fees.
- 20.32.250 Special studies — Preparation and checking fees.
- 20.32.260 Reimbursement processing fees.
- 20.32.270 Charges for maintenance district annexation, formation, exclusions and dissolutions.
- 20.32.280 Charges for sewer maintenance.
- 20.32.290 Cesspool truck disposal fee.
- 20.32.300 Deposit of collected moneys.
- 20.32.310 Special sewer maintenance fund — Use restrictions.
- 20.32.320 Recordkeeping requirements.

**20.32.110 Connection to public sewer — Payment of fees required.** Any person desiring to connect any lot to a public sewer shall, as a prerequisite to

obtaining the permits required by the Plumbing Code set out at Title 25, pay all fees or charges which may be required by Sections 20.32.130, 20.32.150, 20.32.170 and 20.32.200 of this chapter. (Ord. 10020 § 3 (part), 1970; Ord. 6130 Part 5 Ch. 2 § 5203, 1952.)

**20.32.120 Sewer construction permit fees — Table 1.** Before granting any permit for the construction of main-line sewer, house lateral sewer, water pollution control plant, sewage pumping plant, and whenever a permit for any industrial waste treatment or disposal facility is required by the county engineer, the county engineer shall collect the following fees from the applicant to cover the cost of field inspection of the proposed construction, procuring or preparing record plans, automobile mileage, and all overhead and indirect costs:

**Table I — Inspection And Record Plan Fees**

For a Total Valuation of Proposed Work	Permit Fee
\$ 600.00 or less	\$ 65.00
601.00 to \$ 1,000.00	130.00
1,001.00 to 1,500.00	210.00
1,501.00 to 2,000.00	295.00
2,001.00 to 2,500.00	375.00
2,501.00 to 3,000.00	450.00
3,001.00 to 3,500.00	525.00
3,501.00 to 4,000.00	600.00
4,001.00 to 4,500.00	675.00
4,501.00 to 5,000.00	740.00
5,001.00 to 6,000.00	870.00
6,001.00 to 7,000.00	985.00
7,001.00 to 8,000.00	1,090.00
8,001.00 to 9,000.00	1,190.00
9,001.00 to 10,000.00	1,280.00

A. For each \$1,000.00, or fractional part thereof, of the total valuation of the proposed work in excess of \$10,000.00 and not exceeding \$50,000.00, an additional \$85.00:

B. For each \$1,000.00, or fractional part thereof, of the total valuation of the proposed work in excess of \$50,000.00 and not exceeding, \$100,000.00, an additional \$65.00:

C. For each \$1,000.00, or fractional part thereof, of the total valuation of the proposed work in excess of \$100,000.00, an additional \$50.00:

D. For additional work approved by the county engineer but not included in the original permit, the applicant shall pay a base fee of \$8.00 and an additional fee of \$8.00 for each \$100.00, or fractional part thereof, of the total valuation of such additional work. (Ord. 11716 § 15, 1978; Ord. 10020 § 4 (part), 1970; Ord. 8690 §§ 7 and 3 (part), 1964; Ord. 7314 § 1, 1958; Ord. 6982 § 6, 1956; Ord. 6541 § 2 (part), 1954; Ord. 6130 Part 5 Ch. 2 § 5202, 1952.)

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that the sewer lines and manholes have been thoroughly cleaned and the manholes have been satisfactorily constructed, reconstructed or adjusted to county standards.

B. This inspection is also required for construction of industrial waste measuring manholes, reconstruction or adjustment of any portion of a manhole due to service connections or grading or paving operation, or any other work which in the opinion of the county engineer may cause damage to a manhole.

C. The fee shall be \$56.00 for the first manhole and \$28.00 each for each additional manhole. These fees shall cover the costs of field inspection, automobile mileage, and all overhead and indirect costs. (Ord. 11716 § 16, 1978; Ord. 7314 § 2, 1958; Ord. 6130 Part 5 Ch. 2 § 5202.1, 1952.)

**20.32.220 Future assessments for additional benefits.** In the event that any lot which has paid any charges required under Section 20.32.110 receives additional benefit from any public or trunk sewer, nothing contained in Part 2 of this chapter shall relieve the property owner from future payment of charges as herein provided nor from a special assessment levied under a statute of the state of California for such additional benefit. (Ord. 10020 § 3 (part), 1970; Ord. 7314 § 7 (part), 1958; Ord. 6130 Part 5 Ch. 2 § 5210, 1952.)

**20.32.230 Plan checking fees.** Any person required by Chapter 20.32 of this division to have plans checked and processed shall pay to the county engineer the following fee or fees for the service:

1. If the total valuation of the proposed work, as determined by the county engineer, is \$2,000.00 or less, the plan checking fee will be \$160.00;
2. For each \$100.00 or fractional part thereof of the total valuation of the proposed work in excess of \$2,000.00, and not exceeding \$10,000.00, an additional \$4.30;
3. For each \$100.00 or fractional part thereof of the total valuation of the proposed work in excess of \$10,000.00, an additional \$3.25;
4. If any portion of the plans, or specifications, including changes in materials after having been checked, or after being approved and signed by the county engineer are required to be redrawn, rechecked or revised, the applicant shall pay a rechecking fee in the amount of the estimated cost of doing the work as determined by the county engineer;
5. If the plans have been submitted 3 times for checking and are not ready for approval, the applicant shall pay for each additional submittal a fee in the amount of the estimated cost of doing the work as determined by the county engineer;
6. If any portion of plans which have been abandoned or which have expired pursuant to Section 20.32.420 are resubmitted, the applicant shall pay a fee as if work was new. (Ord. 81-0043 § 2, 1981; Ord. 11716 § 20, 1978; Ord. 10020 § 3 (part), 1970; Ord. 8690 § 8 (part), 1964; Ord. 6541 § 3 (part), 1954; Ord. 6130 Part 5 Ch. 2 § 5217, 1952.)

**20.32.240 Sewer easement processing fees.** A. For each private contract requiring the processing of sewer easements, the county engineer shall collect from the applicant a fee of \$310.00 for the first parcel description and title report, and \$180.00 for each additional parcel through which a sewer easement is required. In

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the event it is necessary to revise the description and/or title report due to a realignment or revision of the easement, the county engineer shall collect an additional fee of \$130.00 for each parcel.

B. For each private contract requiring the vacation of a sewer easement, the county engineer shall collect from the applicant a minimum fee of \$290.00. In the event it is necessary to revise the boundary of the proposed vacation due to any revisions submitted by the applicant, the county engineer shall collect an additional fee of \$130.00 for each revision. (Ord. 81-0043 § 3, 1981; Ord. 11903 § 1, 1979; Ord. 11716 § 21, 1978; Ord. 8690 § 8 (part), 1964; Ord. 7314 § 9 (part), 1958; Ord. 6541 § 3 (part), 1954; Ord. 6130 Part 5 Ch. 2 § 5218, 1952.)

**20.32.250 Special studies — Preparation and checking fees.** A. Before proceeding with the preparation of an area, reimbursement, or other special study, the county engineer shall collect from the person making the request for the work a fee in the amount of the estimated cost of doing the work, as determined by the county engineer, but not less than \$300.00.

B. If the cost of doing the work exceeds the fee originally collected, a supplemental fee shall be collected to cover the additional cost as determined by the county engineer.

C. If the county engineer determines that a flow measurement of this existing system is required, there will be an additional minimum fee of not less than \$533.00 per manhole.

D. Studies prepared by others and submitted for checking by the county engineer shall be subject to the fee requirements stated above, except that the minimum fee shall be \$120.00. (Ord. 81-0043 § 5, 1981; Ord. 10020 § 3 (part), 1970; Ord. 8960 § 8 (part), 1964; Ord. 6541 § 3 (part), 1954; Ord. 6130 Part 5 Ch. 2 § 5220, 1952.)

**20.32.260 Reimbursement processing fees.** For each private contract requiring reimbursement under Section 20.28.050, the applicant shall pay, in addition to the plan checking fee, a fee of \$1,500.00 for the preparation of reimbursement documents and maps. If the cost of doing the work exceeds \$1,500.00, a supplemental fee shall be collected to cover the additional cost, as determined by the county engineer. (Ord. 81-0043 § 4, 1981; Ord. 11716 § 22, 1978; Ord. 10020 § 3 (part), 1970; Ord. 8690 § 8 (part), 1964; Ord. 6541 § 3 (part), 1954; Ord. 6130 Part 5 Ch. 2 § 5219, 1952.)

**20.32.270 Charges for maintenance district annexation, formation, exclusions and dissolutions.** A. Any person who desires to place a newly constructed public sewer system in operation, and the property so benefited is not within a maintenance district, shall pay a charge as determined by the county engineer to cover the cost of processing, including the necessary state of California processing fee, the annexation or formation.

B. There will be no charges under this section for processing the dissolution of a maintenance district or the exclusion of any portion of a maintenance district.

C. If the sum collected is for processing an annexation to an existing maintenance district, it shall be deemed to have been appropriated for the year in which the sum was collected, and shall be transferred to the county treasurer and credited to the funds of such district.

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E. Resubmission of abandoned and expired plans shall be subject to new plan check fees as specified in Section 20.32.230. (Ord. 11716 § 26, 1978; Ord. 10020 § 3 (part), 1970; Ord. 8690 § 10 (part), 1964; Ord. 6130 Part 5 Ch. 6 § 5605, 1952.)

20.32.430 Sewer easement requirements. A. A person desiring to construct a sewer in an easement under the provisions of this Division 2 shall present to the county engineer a request for processing, sufficient information to enable the preparation of a written description, and the fee specified in Section 20.32.240.

B. The location and dimensions of sanitary sewer easements shall be sufficient to provide present and future sewer service to abutting areas and adequate access for maintenance as determined by the county engineer.

C. Until the required easements have been properly executed and recorded:

1. No plans shall be approved by the county engineer for sewer facilities to be constructed by any person across the property of others;

2. No sewer facilities shall be accepted for public use, nor placed in use by any person. (Ord. 10020 § 3 (part), 1970; Ord. 8690 § 11, 1964; Ord. 6130 Part 5 Ch. 6 § 5605.1, 1952.)

20.32.440 Main-line sewers — Size specifications. A. The size of main-line sewer pipe shall be determined by standards of design and the coefficients listed below, but in no case shall it be less than eight inches inside diameter.

For zoning in the following categories for residential areas:	Coefficient Cu. ft. per sec. per acre
R-1	0.004
R-2	0.008
R-3	0.012
R-4	0.016*
For commercial areas:	
C-1 through C-4	0.015*
For heavy industrial areas:	
M-1 through M-4	0.021*

\*Individual building, commercial or industrial plant capacities shall be the determining factor when they exceed the coefficients shown.

B. The coefficient to be used for any zoned area not listed will be determined by the county engineer based upon the intended development and use.

C. The county engineer shall determine which of the coefficients or combination of coefficients shall be used for design, as determined by the established or proposed zoning in the study area. Any modifications to these coefficients due to topography, development or hazard areas shall be approved by the county engineer. (Ord. 8690 § 12 (part), 1964; Ord. 6130 Part 5 Ch. 6 § 5606, 1952.)

20.32.450 Main-line sewers — Minimum velocity. A mainline sewer shall be designed to provide a minimum velocity of two feet per second for pipes flowing

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one-half full, except that the county engineer may approve a gradient that will develop a lower velocity if he finds that a gradient that will develop a velocity of two feet per second is unobtainable. (Ord. 6130 Part 5 Ch. 6 § 5607, 1952.)

**20.32.460 Bench marks and elevations.** A system of bench marks on the U.S.C. & G.S. Sea Level Datum of 1929 and adequate to construct the work shall be shown on the profile. The elevation of the sewer at the point where the system is to be discharged shall be shown as determined in the field from the above shown datum. (Ord. 6982 § 9 (part), 1952; Ord. 6130 Part 5 Ch. 6 § 5617, 1952.)

**20.32.470 Soil conditions.** Soil conditions, particularly in areas known to have high groundwater tables, rock, or filled ground, shall be prospected, and the results shown on the profile, if required by the county engineer. (Ord. 6130 Part 5 Ch. 6 § 5616, 1952.)

**20.32.480 Grades.** The slope of the sewer shall be shown on the plans in feet of fall per 100 feet of horizontal distance, expressed as a percentage. Slopes used expressed in percentages shall be divisible, without remainder, by four in the hundredth column. For example, 0.36 percent complies with this section. (Ord. 6130 Part 5 Ch. 6 § 5608, 1952.)

**20.32.490 Main-line sewers — Alignment and location in street.** Where design considerations permit, main-line sewers shall have a straight alignment, and shall be located five feet from and on the northerly and easterly sides of the centerlines of streets or alleys, except on major or secondary highways where separate sewers shall be located in the roadway six feet from each curbline. (Ord. 10020 § 3 (part), 1970; Ord. 8690 § 12 (part), 1964; Ord. 6130 Part 5 Ch. 6 § 5611, 1952.)

**20.32.500 Main-line sewers — Depth.** A. The minimum depth for main-line sewers shall be seven and one-half feet.

B. Where groundwater is present, the depth for residential main-line sewers may be sufficient to provide for a house lateral with a minimum depth of at least five feet below the curb grade or centerline of street or alley grade at the property line.

C. Exceptions to the above minimum may be made only as set forth in Section 20.32.400. (Ord. 8690 § 12 (part), 1964; Ord. 6130 Part 5 Ch. 6 § 5609, 1952.)

**20.32.510 House laterals — Specifications generally.** A. For each lot, a six-inch internal diameter house lateral sewer shall be provided in the street, straight in alignment and grade between the main-line sewer and the property line, with minimum depths as required by Section 20.32.520, and at right angles to the main-line sewer whenever possible.

B. Exception: House laterals constructed in the street under the provisions of the Plumbing Code, (as set out at Title 28 of this code) or house laterals provided in the street for lots restricted to single-family residential use under the provisions of the Zoning Ordinance, set out at Title 22, may have an internal diameter of four inches. (Ord. 10020 § 3 (part), 1970; Ord. 9119 § 1 (part), 1966; Ord. 8690 § 12 (part), 1964; Ord. 6130 Part 5 Ch. 6 § 5620, 1952.)

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**20.32.520 House laterals — Depth.** A. The depth of house laterals at the property line shall be sufficient to provide service to the lowest or farthest point to be served on the lot at a minimum grade of two percent, with the top of the pipe not less than one foot below the ground surface at any point.

B. The minimum depth for house laterals at the property line shall be six feet below the curb grade or the centerline of street or alley grade, except as set forth in Section 20.32.500 for locations where groundwater is present.

C. Where street-widening lines have been established by the Zoning Ordinance, as set out at Title 22 of this code, the minimum depth shall be measured at such established line. If house laterals are constructed before the existing street is widened, the depth at the property line shall be such that extension at the same straight grade and alignment to the new property line will produce the required depth. (Ord. 10020 § 3 (part), 1970; Ord. 9119 § 1 (part), 1966; Ord. 8690 § 12 (part), 1964; Ord. 6130 Part 5 Ch. 6 § 5621, 1952.)

**20.32.530 End structures — Location specifications.** End structures shall be placed at whichever of the following locations is farthest up grade:

A. Not less than 10 feet upgrade from the downgrade lot line of the last lot being served;

B. Not more than 40 feet downgrade from the upgrade lot line of the last lot being served, if there may be a future extension of the main-line sewer;

C. At a location where the house lateral and building sewer can be constructed in a straight alignment at right angles to the main-line sewer. (Ord. 10020 § 3 (part), 1970; Ord. 6130 Part 5 Ch. 6 § 5612, 1952.)

**20.32.540 Manhole structures.** Manhole structures shall be placed in the main-line sewer at all changes of alignment and gradient; the maximum distance between structures shall be not more than 350 feet. All structures shall be designed according to the standard drawings for structures on file in the office of the county engineer. Exceptions to the above requirements may be made only on approval of the county engineer. (Ord. 6130 Part 5 Ch. 6 § 5610, 1952.)

**20.32.550 Substructures.** All substructures which will be encountered in the construction or which will be installed as part of the improvement shall be shown and designated on the plan. Large substructures which require special treatment in the design of the sewer shall also be shown in the profile. The engineer who has prepared the plans shall submit to the county engineer a statement that he has determined from each utility or other company having substructures in the affected area that the location and size of such structures, as shown on the submitted plans, are the same as shown upon such company's records. (Ord. 10020 § 3 (part), 1970; Ord. 6130 Part 5 Ch. 6 § 5615, 1952.)

**20.32.560 Pipe materials — Approval required.** A. All pipe other than vitrified clay or cast iron shall first have been approved for use by the county engineer and shall be equivalent to vitrified clay or cast iron pipe in strength, effectiveness, durability and safety in accordance with the use intended.

B. Before approving any pipe, the county engineer may require satisfactory proof that such pipe is suitable for use, including actual tests performed by an independent and approved testing laboratory at no expense to the county. (Ord. 10020 § 3 (part), 1970; Ord. 8690 § 12 (part), 1964; Ord. 6982 § 9 (part), 1956; Ord. 6130 Part 5 Ch. 6 § 5619, 1952.)

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**20.32.570 Vitrified clay pipe — Installation specifications.** A. Vitrified clay pipe, main-line and house lateral sewers, shall be constructed of the class designated as extra-strength pipe.

B. Sewer pipe installed under a railway shall be encased in concrete, or encased in a steel pipe backfilled with sand, or encased by other approved means which will protect the pipe to the same extent.

C. Sewer pipe installed under a conduit or other structure, or at depths greater than 20 feet or in other locations where the county engineer determines that additional protection is required, shall be reinforced with a concrete cradle, or encased in concrete, or reinforced by other approved means which will protect the pipe to the same extent.

D. Sewer pipe installed in streets or public easements with the top of the pipe less than four feet below the surface, as determined during construction or indicated on the plans, shall be encased in concrete, or other approved means to protect the pipe. (Ord. 8690 § 12 (part), 1964; Ord. 6130 Part 5 Ch.6 § 5614, 1952.)

#### Part 4

### INSPECTION

#### Sections:

- 20.32.580 Materials and construction — Conformity with standard specifications.
- 20.32.590 Inspection by county engineer — Requirements.
- 20.32.600 Notice to county when ready for inspection.
- 20.32.610 Work to be convenient and uncovered.
- 20.32.620 Using facilities before inspection prohibited — Exceptions.
- 20.32.630 Correction of defective work.

**20.32.580 Materials and construction — Conformity with standard specifications.** All material used in any work done under provisions of this Division 2 shall be new, first-class material and shall conform to, and the manner of construction shall meet all the requirements prescribed by this Division 2, by the Standard Specifications for Public Works Construction, and by Special Provisions and Standard Plans on file in the office of the county engineer. All such work shall be approved by the county engineer before a certificate of final inspection will be issued. (Ord. 10020 § 3 (part), 1970; Ord. 6130 Part 5 Ch. 4 § 5407, 1952.)

**20.32.590 Inspection by county engineer — Requirements.** A. All work done under the provisions of this Division 2 shall be subject to inspection by and shall meet the approval of the county engineer, provided, however, that approval by the county engineer shall not relieve the permittee or any other person from complying with all of the applicable provisions of the Plumbing Code set out at Title 28 of this code, and no provision of this Division 2 supersedes, affects or modifies in any way the provisions of said Plumbing Code.

B. After the fee required by Section 20.32.120 has been paid and the permit issued, the county engineer shall inspect the construction for compliance with the requirements of this Division 2. (Ord. 10020 § 3 (part), 1970; Ord. 8690 § 10 (part), 1964; Ord. 6130 Part 5 Ch. 4 § 5401, 1952.)



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**20.32.600 Notice to county when ready for inspection.** The permittee shall notify the county engineer at least 24 hours prior to the time any inspection is to be made. (Ord. 8690 § 10 (part), 1964; Ord. 6130 Part 5 Ch. 4 § 5402, 1952.)

**20.32.610 Work to be convenient and uncovered.** At the time of the inspection the permittee shall have all work uncovered and convenient, and shall give the county engineer every facility to make a thorough inspection. (Ord. 10020 § 3 (part), 1970; Ord. 8690 § 10 (part), 1964; Ord. 6130 Part 5 Ch. 4 § 5403, 1952.)

**20.32.620 Using facilities before inspection prohibited — Exceptions.** No sewer or other facility constructed under the provisions of this Division 2 shall be placed in use until the work has been approved by the county engineer and a certificate of final inspection has been issued. Exceptions to this requirement may be made only when the work is substantially complete and has been inspected, and if the county engineer determines that the best interests of the public will be served by permitting such use prior to completion of the work. (Ord. 10020 § 3 (part), 1970; Ord. 6130 Part 5 Ch. 4 § 5408, 1952.)

**20.32.630 Correction of defective work.** If the construction does not conform to the provisions of this Division 2, or if the permittee fails to prosecute the work with such diligence to insure its completion within the time specified, the county engineer shall notify the permittee, in writing, to comply. If the permittee fails to comply within five days after the written notice, the permit shall be suspended or revoked in accordance with the procedures set forth in Sections 20.36.160, 20.36.170, 20.36.180 and 20.36.210, and no further work shall be done by the permittee until the suspension is removed either by correction of the work or after appeal and public hearing in accordance with the procedures set forth in Sections 20.36.090, 20.36.100, 20.36.190 and 20.36.200. (Ord. 8690 § 10 (part), 1964; Ord. 6130 Part 5 Ch. 4 § 5405, 1952.)

#### Part 5

#### MAINTENANCE

##### Sections:

- 20.32.640 Injuring or removing sewers or equipment.
- 20.32.650 Dumping of effluent — Conditions.
- 20.32.660 Manholes — Opening or entering prohibited.
- 20.32.670 Manholes — Cleaning required after dumping effluent.
- 20.32.680 Reconnection following violations — Conditions — Cost reimbursement.
- 20.32.690 Reimbursement for repairs and maintenance following violations.

**20.32.640 Injuring or removing sewers or equipment.** An unauthorized person shall not remove or cause to be removed, or injure or cause to be injured, any portion of any public sewer, sewage pumping plant, water pollution control plant, or any appurtenances thereto. (Ord. 8690 § 10 (part), 1964; Ord. 6130 Part 5 Ch. 5 § 5501, 1952.)

**20.32.650 Dumping of effluent — Conditions.** The county engineer may permit operators of cesspool pump trucks holding a valid certificate of registration issued by the county health officer to dispose of septic tank, seepage pit or cesspool effluent which does not contain harmful concentrations of industrial liquid wastes, oils, greases, or other deleterious substances, into certain designated manholes. Operators may dump into the special facilities provided for the purpose at a county sewer maintenance yard upon payment of the fee specified in Section 20.32.290. No person shall dump such effluent in any manhole other than those designated by the county engineer. The county engineer may refuse to accept such effluent if it fails to meet the aforementioned requirements. (Ord. 10020 § 4 (part), 1970; Ord. 8690 § 10 (part), 1964; Ord. 7314 § 11 (part), 1958; Ord. 6130 Part 5 Ch. 5 § 5503, 1952.)

**20.32.660 Manholes — Opening or entering prohibited.** An unauthorized person shall not open or enter, or cause to be opened or entered, for any purpose whatsoever, any manhole in any public sewer. (Ord. 6130 Part 5 Ch. 5 § 5502, 1952.)

**20.32.670 Manholes — Cleaning required after dumping effluent.** When septic tank, seepage pit or cesspool effluent is dumped into a specified manhole under permission from the county engineer, it shall be discharged through a pipe or hose in a manner such that none of the effluent shall be left adhering to the sides or shelf of the manhole, and if any such effluent is inadvertently allowed to adhere to the sides or shelf of the manhole, the manhole shall be thoroughly cleaned with clear water. (Ord. 8690 § 10 (part), 1964; Ord. 6130 Part 5 Ch. 5 § 5504, 1952.)

**20.32.680 Reconnection following violations — Conditions — Cost reimbursement.** Whenever an industrial connection sewer has been disconnected from the public sewer by the county engineer for failure to comply with the provisions of this Division 2, reconnection shall be made only upon issuance of a permit as elsewhere in this division provided. Before such permit is issued, the applicant shall reimburse the county for the cost of the disconnection made, and the county engineer may require the installation of a manhole for the purpose of measuring the flow, or for making periodic tests of the wastes from such connection. (Ord. 6130 Part 5 Ch. 5 § 5505, 1952.)

**20.32.690 Reimbursement for repairs and maintenance following violations.** Whenever an industrial sewer connection permittee by reason of violation of Section 20.36.400 of this code, or any other person by reason of violation of Section 20.32.640, causes obstruction, damage or destruction of a public sewer, or any appurtenances thereto, or pumping plants or water pollution control plants in connection therewith, he shall reimburse the county sewer maintenance district in which damage occurred for the cost of flushing, cleaning, repairing and reconstruction of such sewer or facility, made necessary by such violation, within 30 days after the county engineer has rendered an invoice for the same. The amount when paid shall be deposited into the fund of the said maintenance district. (Ord. 8690 § 10 (part), 1964; Ord. 6130 Part 5 Ch. 5 § 5506, 1952.)

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- 20.36.200 Reinstatement of suspended permit.
- 20.36.210 Revocation of permit — Recommendation by county engineer.
- 20.36.220 Cancellation of permit — Conditions.

**20.36.010 Discharge of offensive or damaging substances prohibited.** A person shall not discharge or deposit or cause or suffer to be discharged or deposited at any time or allow the continued existence of a deposit of any material which may create a public nuisance, or menace to the public health or safety, or which may pollute underground or surface waters, or which may cause damage to any storm-drain channel or public or private property. (Ord. 6130 Part 6 Ch. 3 § 6301, 1952.)

**20.36.015 Dilution prohibited.** No person shall discharge or cause to be discharged any water or other substance added for the purpose of diluting any industrial waste to achieve compliance with limitations imposed by the provisions of this Division 2. (Ord. 89-0101 § 25, 1989.)

**20.36.020 Construction of new industrial buildings — Information required.** Every person applying for a permit pursuant to the provisions of the Building Code, as set out at Title 26 of this code, for construction of a new industrial building or for an addition or alteration to an existing industrial building shall furnish to the county engineer such plans, information, data, statements or affidavits as the county engineer may require for determination of the nature and quantity of industrial waste involved and the facilities to be provided for the disposal thereof. (Ord. 6130 Part 6 Ch. 3 § 6302, 1952.)

**20.36.030 Construction of new industrial buildings — Building permit issuance prerequisites.** An application for a permit pursuant to the Building Code to construct a new industrial building or for an addition or alteration to an existing industrial building will not be approved until provision has been made for the installation of such pretreatment facilities and disposal methods or both as, in the opinion of the county engineer, are necessary to carry out the provisions and intent of this Division 2. (Ord. 6130 Part 6 Ch. 3 § 6303, 1952.)

**20.36.031 Construction of facilities connecting to a STEP system — Information and building permit prerequisites.** Every person applying for a permit pursuant to the provisions of the Building Code as set forth in Title 26 of this code, or the Los Angeles County Plumbing Code, as set forth in Title 28 of this code, for the construction of any facility to be connected to a STEP pressure sewer system, shall furnish to the county engineer or his designated agent such plans, information, data, statements or affidavits as the county engineer or his designated agent may require for the determination of the nature and quantity of wastewater involved, the facilities to be provided for the disposal thereof, and the structures or means necessary for the protection of such facilities.

An application for a permit pursuant to the Building or Plumbing Codes for facilities to be connected to a STEP pressure sewer system will not be approved until provision has been made for the installation of such pretreatment facilities, including protective means and structures for those facilities, as in the opinion of the county engineer or his designated agent are necessary to carry out the provisions and intent of this Division 2. The application also will not be approved until a letter of credit, cash deposit, performance bond, or other form of security acceptable to the county engineer or his designated agent, accompanied by a right of entry release,

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as required by this Division 2 for such permit, and shall rectify and cure all such violations. Failure to do so shall constitute a wilful violation of this Division 2. (Ord. 7519 § 4 (part), 1959; Ord. 6130 Part 6 Ch. 3 § 6310, 1952.)

**20.36.120 Successor in interest — New permit required.** The successor in title or interest of a premises for which a permit had previously been granted shall file with the county engineer a new permit application, in accordance with the provisions of Section 20.36.320 or Section 20.36.490, within 30 days after assumption of such title or interest, and shall furnish plans and data as may be required by the county engineer. If it appears from the application and data that the succeeding operation and disposal practices comply with the provisions of this Division 2, the county engineer, upon receipt of the fees hereinafter required, shall issue such permit. (Ord. 11716 § 39, 1978; Ord. 7010 § 1 (part), 1956; Ord. 6541 § 5, 1954; Ord. 6130 Part 6 Ch. 3 § 6319.5, 1952.)

**20.36.125 Interim permit — Ongoing discharge.** Upon receipt of an application for a permit for an ongoing discharge, an interim permit may be issued by the director to allow the continuation of such discharge during the application review period, subject to conditions to be imposed by the director, where the director determines that the continuation of such discharge does not appear to be detrimental to the public health and safety. (Ord. 89-0101 § 28, 1989.)

**20.36.130 Permit not transferable from one location to another.** Permits issued under this chapter are not transferable from one location to another, and discharge of wastes shall be made strictly in accordance with all provisions contained in the permit, at the location specifically designated therein. (Ord. 6541 § 6, 1954; Ord. 6130 Part 6 Ch. 3 § 6320, 1952.)

**20.36.135 Monitoring and sampling — Pre-notification.** Any permittee required by the director, by permit or otherwise, to engage in periodic monitoring or sampling of a discharge shall notify the director by telephone at least 48 hours in advance of any monitoring or sampling to be done. Prior to the commencement of any sampling or monitoring, the director may request that the permittee furnish the director a split sample and all supporting data. Each permittee shall submit to the director, certified under penalty of perjury by the permittee, its monitoring and sampling reports or other requested data. (Ord. 89-0101 § 29, 1989.)

**20.36.140 Notice to correct violations.** A. The county engineer may serve notice of violation upon the person owning or operating premises describing the conditions and requiring prompt correction thereof, when he finds that:

- 1. Industrial waste, effluent, or any other material is being maintained, discharged or deposited in such a manner as to create, or if allowed to continue will create, any one or more of the following conditions:
  - a. A public nuisance,
  - b. A menace to the public safety,
  - c. Pollution of underground or surface waters,
  - d. Adverse effect or damage to any public sewer, storm drain, channel, or public or private property; or that

2. The permittee has failed to conform with conditions or limitations of any permit issued in accordance with this Division 2;











Frozen foods	2	B
Hydroponic farms	2	B
Poultry	3	E
Prepared meat, poultry and fish products	2	C
Public eating places and plant cafeterias (including STEP system connections)	1	A
Rendering	3	C
Sugar and confectionary products	1	A
Vegetable fats and oils	2	B
Vegetable packing	3	D

**Mining, Manufacturing and Processing**

Aircraft	3	C
Aircraft engines, parts and accessories	3	C
Ammunition and explosives	2	D
Asphalt and asphalt products	4	E
Battery manufacturing, servicing and reclaiming	3	E
*NCPS facilities	4	M
Blast furnaces, steel works, rolling and finishing mills	4	E
*NCPS facilities	5	M
Carpet mills with dyeing	4	D
*NCPS facilities	5	E
Carpet mills without dyeing	1	A
Cement manufacturing	3	B
Ceramics	2	D
Chemical milling	5	E
*NCPS facilities	6	M
Chemical plants	5	E
*NCPS facilities	6	M
Coating, electroplating, engraving and related services	4	E
*NCPS facilities	5	M
Concrete batch plants	2	D
Cut stone and stone products	2	A
Electric power generation plants except waste-to-energy facilities	3	B
*NCPS facilities	4	E
Enameled products	2	B
*NCPS facilities	4	E
Guided missiles, space vehicles, space vehicle propulsion units and propulsion unit parts	4	D
Iron and steel foundries and heat treating	4	D
*NCPS facilities	5	E
Linoleum, asphalt-felt-base and other hard-surface floor coverings	2	B
Metal fabrication (no chemical wastes)	1	B

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Spray-painting shops	1	A
Steel springs manufacturing	3	E
*NCPS facilities	4	M
Tanning and wool pulling	3	D
*NCPS facilities	4	E
Textile mills, treating and dyeing	4	D
*NCPS facilities	5	E
Wood fabrication (no chemical wastes)	1	A
 <b>Retail Trade and Services (Including STEP System Connections)</b>		
Airports, flying fields and airport terminal services	1	B
Automotive repair	1	C
Bottle and can washing	2	B
Car wash	1	C
Chemical laboratories	1	B
Cleaners, retail	1	B
Commercial laundries (not coin-operated)	2	B
Cooperages	3	D
Dry cleaning plants	2	D
Film processing plants	2	C
Film processing, retail	1	A
Kennels, dog and cat hospitals	1	A
Marine service	2	A
Schools, churches and institutions	1	A
Service stations — incidental car washing, repairs and maintenance	1	A
Tank truck interior washing	2	D
Truck repair and exterior washing	1	C
 <b>Waste Disposal Facilities</b>		
Cogeneration facilities (not otherwise classified)	2	C
Hazardous waste treatment, recycling, storage and transfer facilities	6	M
Injection wells, non-oilfield wastes (liquids)	3	M
Landfill gas recovery facilities	6	M
Liquid waste storage and transfer facilities, nonhazardous	4	E
Open facilities, not used	1	A
Solid-waste transfer, recycling and composting facilities	3	D
Solid-waste incinerators	6	M
Waste-to-energy facilities	6	M



20.36.300

20.36.450 Ground garbage.

20.36.300 Application of Part 3 provisions. The provisions of this Part 3 of Chapter 20.36 shall pertain to the disposal of industrial waste to the public sewer only. (Ord. 7519 § 3 (part), 1959; Ord. 6130 Part 6 Ch. 1 § 6101, 1952.)

20.36.310 Permit — Required when. A. A person shall obtain a permit from the county engineer prior to the discharge of industrial waste to a public sewer.

B. The county engineer shall not grant such a permit unless he finds that sufficient capacity exists in the public sewer to allow for such industrial waste, as determined by the requirements of Section 20.32.080.

C. A separate permit shall be required for each connection discharging industrial wastes to the public sewer.

D. For the purpose of this section, discharges resulting from garbage grinders powered by motors of one horsepower or less, and grease interceptors installed in restaurants in accordance with the provisions of the Los Angeles County Plumbing Code where such facilities are not required by other provisions of this Division 2, are not considered to be industrial waste discharges.

E. A person shall obtain a permit from the county engineer to maintain an existing but nonused industrial waste connection to the public sewer. The annual inspection fee for such permit shall be the same as that for Inspection Fee Class A. The connection shall be removed upon the expiration or revocation of such permit pursuant to the criteria established by Section 20.36.220. (Ord. 84-0109 § 8, 1984; Ord. 11716 § 28, 1978; Ord. 10020 § 3 (part), 1970; Ord. 7519 § 3 (part), 1959; Ord. 6982 § 11, 1956; Ord. 6130 Part 6 Ch. 1 § 6102, 1952.)

20.36.320 Permit — Application forms — Information required. A. The director shall provide printed application forms for the permit required by this Part 3, indicating thereon the information to be furnished by the applicant. In conjunction therewith, the applicant may be required to furnish the following:

1. The name and address of the applicant;
2. The name and address of the discharger;
3. The address or location of the premises where the discharge will take place;
4. The Standard Industrial Classification (SIC) of the discharger;
5. Information with respect to constituents and characteristics of wastewater proposed to be discharged, including but not limited to those referred to in this Part 3. Sampling and analysis shall be performed in accordance with procedures established by the EPA pursuant to Section 304(g) of the Act and contained in 40 CFR, Part 136, as amended, and by laboratories certified by the state of California. In the absence of a state certification process, the director may certify a laboratory to perform necessary sampling and analysis;
6. Time and duration of the proposed discharge or discharges;
7. Average daily and five-minute peak wastewater flow rates, including daily, monthly and seasonal variation, if any;
8. Each byproduct waste of the discharges by type, amount and rate of production;
9. Site plans, floor plans, mechanical and plumbing plans and details to show all sewers, storm drains, connections and appurtenances by their size, location and elevation;

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**20.36.290 Annual inspection fee — Refund conditions.** Upon cancellation of permit pursuant to Section 20.36.220, and upon written request of the permittee, the county engineer shall refund a portion of the annual inspection fee as determined from the table below:

Days From Previous Billing Date	Percent Required
1 — 60	75%
61 — 150	50%
151 — 240	25%
241 or more	0%

(Ord. 11716 § 47, 1978; Ord. 6130 Part 6 Ch. 4 § 6407, 1952.)

**20.36.295 Annual review of fees.** Beginning on July 1, 1990, and thereafter on each succeeding July 1st, the amount of each fee in this chapter shall be adjusted as follows: calculate the percentage movement between April of the previous year and March of the current year in the Consumer Price Index (CPI) for all urban consumers in the Los Angeles, Anaheim, Riverside areas, as published by the United States Government Bureau of Labor Statistics, adjust each fee by said percentage amount and round off to the nearest one dollar (\$1.00). Notwithstanding the foregoing, no such adjustment shall decrease any fee, and further, no fee shall exceed the reasonable cost of providing the services for which the fee is collected. (Ord. 89-0101 § 38, 1989.)

**Part 3**

**DISCHARGE TO PUBLIC SEWERS**

**Sections:**

- 20.36.300 Application of Part 3 provisions.
- 20.36.310 Permit — Required when.
- 20.36.320 Permit — Application forms — Information required.
- 20.36.330 Permit — Issuance conditions.
- 20.36.340 Determination of type of liquid waste.
- 20.36.350 Pretreatment — Plans prerequisite to permit issuance when.
- 20.36.360 Permit — Revocation conditions.
- 20.36.365 Public participation — Notification of significant violations.
- 20.36.370 Disconnection following permit revocation.
- 20.36.380 Pretreatment — Standards and criteria.
- 20.36.390 Rainwater diversion systems — Authorized when.
- 20.36.400 Deposit of certain substances prohibited.
- 20.36.402 National Categorical Pretreatment Standards (NCPS) — Compliance.
- 20.36.404 Compliance with local limits.
- 20.36.410 Toxic substances.
- 20.36.420 Control of pH.
- 20.36.430 Temperature restrictions.
- 20.36.440 Cooling water.

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either that the waste is one which will not damage or destroy the public sewer, or cause an unwarranted increase in the cost of maintenance of the public sewer, or retard or inhibit the treatment of the sewage, or is one that can be made acceptable by pretreatment. (Ord. 6130 Part 6 Ch. 1 § 6106, 1952.)

**20.36.350 Pretreatment — Plans prerequisite to permit issuance when.** In event pretreatment or special facilities are required to make the waste acceptable as provided under the provisions of this Division 2, the applicant for an industrial waste disposal permit may be required to furnish plans showing the method of collections and pretreatment proposed to be used, and a permit shall not be issued until said plans or required modification thereof have been checked and approved by the county engineer. (Ord. 6130 Part 6 Ch. 1 § 6107, 1952.)

**20.36.360 Permit — Revocation conditions.** By following the procedure set forth in Part 1 of this chapter, the county engineer may recommend the revocation of and the board may revoke any permit if, after a public hearing, if a public hearing is requested, or otherwise, after due investigation, the board finds:

- A. A failure of the permittee to correct conditions as required by the county engineer; or
- B. Conditions which would justify the denial of a permit; or
- C. Fraud or deceit was employed in obtaining the permit; or
- D. Any other violation of this Division 2 or of any conditions of any permit including the one to be revoked, license or exception granted hereunder. (Ord. 7519 § 3, 1959: Ord. 6130 Part 6 Ch. 1 § 6103, 1952.)

**20.36.365 Public participation — Notification of significant violations.** At least annually, the director shall provide public notification, in the largest daily newspaper published in the municipality in which a POTW is located, of industrial users of the POTW which, during the previous 12 months, were significantly violating applicable pretreatment standards or other pretreatment requirements, as provided in 40 CFR 403.8. The director need not provide such notification if a notice meeting all applicable EPA requirements has been published by the POTW operator. The cost of such public notification shall be collected by the director from the discharger causing such violation and/or notification. (Ord. 89-0101 § 40, 1989.)

**20.36.370 Disconnection following permit revocation.** If a permit is revoked, the county engineer may disconnect from the public sewer any industrial connection sewer which was connected pursuant to such permit. (Ord. 7519 § 3, 1959: Ord. 6130 Part 6 Ch. 1 § 6103.5, 1952.)

**20.36.380 Pretreatment — Standards and criteria.** The county engineer may establish uniform minimum standards and criteria for the application of such standards for pretreatment of specific industrial waste discharges. The provision of this section shall not prohibit the county engineer from requiring additional pretreatment to accomplish the objective of Section 20.36.340. (Ord. 11716 § 52, 1978: Ord. 6130 Part 6 Ch. 1 § 6107.5, 1952.)

**20.36.390 Rainwater diversion systems — Authorized when.** The county engineer may authorize the installation of a rainwater diversion system in lieu of roofing to prevent the discharge of stormwaters to the sewer system where roofing is





- 20.36.540 Deposits creating menace to public health — Notice requirements.  
 20.36.550 Permit — Issuance conditions.

**20.36.460 Applicability of Part 4 provisions.** The provisions of this Part 4 shall pertain to the disposal, discharge or deposit of all industrial waste except where such wastes are discharged to a public sewer in accordance with the provisions of Part 3 of this chapter. (Ord. 11716 § 34, 1978; Ord. 8690 § 3 (part), 1964; Ord. 6130 Part 6 Ch. 2 § 6201, 1952.)

**20.36.470 Depositing or discharging wastes prohibited without permit.** A person shall not maintain a deposit of waste material, or discharge or deposit or cause or suffer to be discharged or deposited, except as otherwise provided in this Division 2, any waste material or effluent in or upon unincorporated territory of the county of Los Angeles, or into streams or bodies of surface or subsurface water, or storm drains, or flood control channels, where the same is deposited upon or may be carried through or upon unincorporated territory of the county without first securing, in the manner provided in this chapter, a permit from the county engineer so to do, and at all times having an unrevoked permit therefor, unless otherwise exempted by the provisions of this chapter. (Ord. 6130 Part 6 Ch. 2 § 6202, 1952.)

**20.36.475 Maintenance of existing, nonused facility for industrial waste deposit, discharge or storage.** A person shall obtain a permit from the county engineer to maintain an existing but nonused facility designed or formerly used for the deposit, discharge or storage of industrial wastes. The annual inspection fee for such permit shall be the same as that for Inspection Fee Class A.

Exception: Such permit is not required when, to the satisfaction of the county engineer, compliance with the permit cancellation criteria of Section 20.36.220 has been provided. (Ord. 84-0109 § 9, 1984.)

**20.36.480 Permit — Not required when.** No permit shall be required for the disposal of waste which consists only of domestic sewage into septic tanks, cess-pools or seepage pits constructed pursuant to the provisions of the Plumbing Code, as set out at Title 28 of this code. (Ord. 8690 § 12 (part), 1964; Ord. 6130 Part 6 Ch. 2 § 6203, 1952.)

**20.36.490 Permit — Application — Form and contents.** Any person requiring a permit under the provisions of this Part 4 shall make written application therefor to the county engineer, giving such information as the county engineer may require. The county engineer shall provide printed application forms, indicating thereon the information to be furnished by the applicant. The county engineer may require from the applicant, in addition to the information furnished on the printed form, any additional information including detailed plans and specifications which will enable the county engineer to determine that the proposed discharge or deposit and plan of operation complies with the provisions of this Division 2 and other applicable laws and ordinances. (Ord. 11716 § 35, 1978; Ord. 10276 § 2, 1971; Ord. 7010 § 1 (part), 1956; Ord. 6130 Part 6 Ch. 2 § 6204, 1952.)

**20.36.500 Permit — Plans required with application when.** A. The county engineer may require that an application for a permit to dispose of industrial waste

20.36.500

shall be accompanied by suitable plans showing the proposed method of collection, treatment and disposal, and a permit shall not be issued until said plans or required modification thereof have been checked and approved by the county engineer.

B. The county engineer may submit the application or plans, or both, to any public agency for comment or recommendation. (Ord. 6541 § 4, 1954; Ord. 6130 Part 6 Ch. 2 § 6205, 1952.)

**20.36.510 Use of public property — Permit required when.** Whenever facilities for the discharge of industrial waste connect to structures, or encroach on the property or rights-of-way owned or controlled by a public agency, the county engineer may either:

A. Require that the applicant obtain a property-use permit, license, easement, or other right to use said properties prior to the issuance of a permit to dispose of industrial waste; or

B. Issue such permit subject to the execution of a property-use permit, license, easement, or other right to use said properties. (Ord. 6130 Part 6 Ch. 2 § 6206, 1952.)

**20.36.520 Notification of public agencies required.** Whenever an application for permit is filed, the county engineer shall notify the county health officer and such other public agencies as in his opinion may be affected, and shall request a prompt reply containing their recommendations. Upon request, he shall secure from the applicant and furnish to the affected department or agency such additional plans or information as it may require, relative to such application. (Ord. 6130 Part 6 Ch. 2 § 6207, 1952.)

**20.36.530 Investigation by county officers and departments.** Whenever notified that an application for permit has been filed, the county health officer, the county engineer and other county departments affected shall make such investigations as in their opinions are required. The health officer and such other departments shall, within 20 days of notification of the filing of the application, make and file reports of their investigations with the county engineer. Such reports shall narrate all facts found, and shall recommend that the application be denied, or be granted in whole or in part, and if granted, subject to what conditions, if any. Such report may also disclaim interest in the application. (Ord. 6130 Part 6 Ch. 2 § 6208, 1952.)

**20.36.540 Deposits creating menace to public health — Notice requirements.** When the county health officer finds that industrial waste or effluent, or any other material, is being discharged or deposited in such manner as to create a menace to the public health, he may serve notice of violation upon the person owning or operating the premises, describing the conditions, and requiring the prompt correction thereof and shall so notify the county engineer. (Ord. 6130 Part 6 Ch. 2 § 6209, 1952.)

**20.36.550 Permit — Issuance conditions.** The county engineer shall issue a permit as required by this Division 2 if he determines that all of the following conditions have been met:

A. All fees or deposits hereinafter required have been paid:

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B. Recommendations and conditions of the various county departments, as contained in their reports, if any, have been met. The county engineer may waive this provision except as to the requirements of the county health officer;

C. The material to be discharged or deposited does not or will not, in the opinion of the county health officer, constitute a potential public nuisance or menace to the public health and safety, and will not violate other provisions of the Health and Safety Code of the state of California;

D. The material to be discharged or deposited does not or will not involve disposal of any toxic materials or chemicals in such manner as to cause pollution of any stream, watercourse, lake, or other body of water, or underground or surface water storage reservoir, either natural or artificial;

E. The material to be discharged or deposited does not or will not damage or adversely affect any storm drain, channel, or any public or private property;

F. Under existing circumstances and conditions it is necessary and reasonable so to dispose of such waste matter. (Ord. 6130 Part 6 Ch. 2 § 6210, 1952.)

#### Part 5

### TREATMENT PLANTS AND FACILITIES

#### Sections:

- |           |   |
|-----------|---|
| 20.36.560 | Installation — Required when.                         |
| 20.36.570 | Pretreatment — Standards and criteria.                |
| 20.36.580 | Facilities not required when.                         |
| 20.36.590 | Installation — Access for inspection and maintenance. |
| 20.36.600 | Separation of domestic and industrial wastes.         |
| 20.36.610 | Operation and maintenance.                            |
| 20.36.620 | Inspection and testing.                               |
| 20.36.630 | Right of entry for inspection authorized when.        |
| 20.36.640 | Owner's safety regulations — Compliance by inspector. |
| 20.36.650 | Test manholes or other structures.                    |

**20.36.560 Installation — Required when.** Industrial waste treatment plants or facilities shall be installed whenever the county engineer shall find as a fact that such facilities are required to safeguard the public health; prevent pollution of streams or bodies of surface or underground water; prevent pollution of water wells or storage reservoirs, either natural or artificial; prevent damage or increased maintenance costs in the sewerage system; prevent damage to public or private property; prevent a public nuisance; or to comply with applicable regulations of any other public agency. (Ord. 6130 Part 6 Ch. 5 § 6501, 1952.)

**20.36.570 Pretreatment — Standards and criteria.** The county engineer may establish uniform minimum standards and criteria for the application of such standards for pretreatment of specific industrial waste discharges. The provisions of this section shall not prohibit the county engineer from requiring additional pretreatment to accomplish the objective of Section 20.36.340 of this chapter. (Ord. 11716 § 49, 1978; Ord. 6130 Part 6 Ch. 5 § 6501.5, 1952.)

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**20.36.580 Facilities not required when.** Installation of industrial waste treatment facilities may not be required if the county engineer determines that:

A. The waste is prohibited for discharge to the available systems by this Division 2 or other applicable ordinances or regulations;

B. The affected industry has guaranteed to separately dispose of any objectionable waste to legal points of disposal;

C. Adequate facilities are to be provided for the collection and containment of such wastes, and that provisions have been made to prevent intentional or accidental discharge of such wastes to the sewer system, ground surface, surface or underground water supplies, rivers, channels, storm drains, public streets or gutters;

D. An application for industrial waste disposal permit has been filed in accordance with Part 4 of this chapter; and

E. All fees required by this Division 2 have been paid. (Ord. 11716 § 50, 1978; Ord. 6130 Part 6 Ch. 5 § 6502, 1952.)

**20.36.590 Installation — Access of inspection and maintenance.** Interceptors or other industrial waste treatment plants or facilities shall be so installed and constructed that they shall be at all times easily accessible for inspection and maintenance. (Ord. 6130 Part 6 Ch. 5 § 6503, 1952.)

**20.36.600 Separation of domestic and industrial wastes.** All domestic wastes from restrooms, showers, drinking fountains, etc., shall be kept separate from all industrial wastes until the industrial wastes have passed through any required pretreatment facilities. (Ord. 11716 § 51, 1978; Ord. 6130 Part 6 Ch. 5 § 6503.5, 1952.)

**20.36.610 Operation and maintenance.** All industrial waste treatment plants or facilities or water pollution control plants, and all appurtenances thereto, existing as of October 23, 1964, or hereafter constructed under jurisdiction of this Division 2 shall be maintained, by the owner or person having jurisdiction of the property affected, in good operating condition and in a safe and sanitary condition at all times. All devices and safeguards which are required by this Division 2 for the operation thereof, and all records of such operation, shall be maintained in good order. (Ord. 8690 § 3 (part), 1964; Ord. 6130 Part 6 Ch. 5 § 6504, 1952.)

**20.36.620 Inspection and testing.** The county engineer shall make tests of industrial wastes, periodic inspections of water pollution control plants and industrial waste treatment plants or facilities to determine whether such treatment plants or facilities are maintained in accordance with the requirements of this Division 2. The county engineer shall also make periodic tests on samples of sewage, industrial waste or effluents obtained at the point of discharge or deposit to determine whether such discharges or deposits are made in accordance with the provisions of this division. (Ord. 8690 §§ 3 (part) and 12 (part), 1964; Ord. 6130 Part 6 Ch. 5 § 6505, 1952.)

**20.36.630 Right of entry for inspection authorized when.** A. The county engineer shall be permitted at all reasonable hours to inspect water pollution



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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600



March 9, 1994

Mr. David Yamahara  
Assistant Deputy Director  
County of Los Angeles  
Department of Public Works  
Waste Management Division  
900 S. Fremont Avenue  
Alhambra, CA 91803-1331

LOS ANGELES COUNTY AREA-WIDE NATIONAL POLLUTANT DISCHARGE  
ELIMINATION SYSTEM MUNICIPAL STORM WATER DISCHARGE PERMIT  
(NPDES NO. CA0061654, CI 6948)

The Los Angeles Regional Water Quality Control Board adopted an NPDES Municipal Storm Water Discharge Permit (Order No. 90-079) on June 18, 1990. The County, as Principal Permittee to the Los Angeles County area-wide NPDES Municipal Storm Water Discharge Permit, currently participates under Phase I, Phase II, and Phase III of the permit due to the County's drainage patterns. This Regional Board has received your letter dated February 24, 1994, in which the County requests to combine certain activities required by the Permit under Phase II and Phase III under the deadlines for Phase II. Regional Board staff has considered the request and finds it to be acceptable in concept. However, a detailed time schedule will need to be submitted to Regional Board staff for final approval.

If you have any questions please call me at (213) 266-7510 or Carlos Urrunaga at (213) 266-7598.

*Robert P. Ghirelli*

ROBERT P. GHIRELLI, D. Env.  
Executive Officer

cc: Rod Kubomoto, Los Angeles County Department of Public Works, Waste Management  
Division

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THOMAS A. TIDEMANSON, Director

# COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

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IN REPLY PLEASE  
REFER TO FILE

WM-3

January 13, 1994

Dr. Robert P. Ghirelli  
Executive Officer  
California Regional Water  
Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Dr. Ghirelli:

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT  
NO. CA0061654 (CI6948) - QUARTERLY PROGRESS REPORT**

The following report is submitted in compliance with the above-captioned Permit, which was issued on June 18, 1990. This report provides a summary on the status of specific Permit tasks performed during the second quarter (October 1, 1993, through December 31, 1993) of the fourth-year of the Permit which began on July 1, 1990.

PHASE I FOURTH-YEAR ACTIVITIES (Santa Monica Bay Drainage Basin)

The primary tasks for Phase I, in the fourth year of the Permit, is to continue to implement Permit compliance activities and to report on progress. The Department of Public Works (DPW) continues to organize and chair the monthly Co-Permittee meetings to coordinate Permit compliance. Enclosed is a chart summarizing the attendance record of the Co-Permittees (Attachment A).

We have revised the Stormwater/Urban Runoff Monitoring Program based on your recommendations in your June 17, 1993 report and subsequent meetings with your staff. The refined program was submitted to you in August and we are awaiting your approval.

Channel modifications have been completed at the first two automated fixed-site monitoring stations, in Ballona and Malibu Creeks. The remaining sampling equipment needed for these stations is expected to be delivered in mid-January 1994. We anticipate installing the sampling equipment at the two sites toward the end of January. Tentative agreements have been reached with the Malibu West Swimming Club (Homeowners Association) and the Rand Corporation regarding, respectively, the Trancas Canyon and Pico-Kenter Drain monitoring stations. Construction permits have been

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Dr. Robert P. Ghirelli  
January 13, 1994  
Page 2

forwarded to both parties for signature, with construction at these two sites to commence upon execution by each party. We are also in the process of securing the necessary right-of-way and city approvals for the Herondo Drain station and the Storm Drain Bond Issue Project No. 558 (Palos Verdes Estates) station.

As discussed in our letter to you dated August 16, 1993, the DPW has conducted an evaluation of currently available dynamic water quality models. Dynamic modeling will be performed for a select urbanized watershed in Phase I to more closely model pollutant loadings and Best Management Practices (BMPs) impacts. Based on our evaluation, we propose to utilize the EPA Stormwater Management Model (SWMM). We are now focussing our efforts on selecting a representative, urbanized watershed for modeling.

The DPW is continuing to stencil its catch basins. To date, over 4,000 County catch basins have been painted in various localities throughout Phase I. All catch basins in the unincorporated areas of the County in Phase I have been completed. We are currently stenciling County-owned and maintained catch basins in the County unincorporated areas of East Los Angeles (Phase III).

The DPW is also continuing active participation with the Santa Monica Bay Restoration Project and the Malibu Creek Watershed Natural Resource Plan in support of regional efforts to enhance the quality of stormwater. The DPW has voluntarily participated in the Malibu Watershed Monitoring, which includes obtaining and analyzing water samples from 20 stations.

The DPW has developed a draft "Field Connection Inventory Procedure Manual - For Illegal Connections and Illicit Discharges." This document will further formalize the storm drain field inspection program for County storm drains. In the interim, suspected problem areas are continuously being targeted for field investigations and water quality sampling. This document has been distributed for comments by the Ballona Creek Clean Up Task Force Subcommittee, which is evaluating sanitary survey procedures.

The DPW is reviewing a proposed residential development in Ladera Heights which incorporates BMPs into its drainage plan. As a test case, the plan includes a sluice gate in a manhole to divert nuisance and low flows to a privately maintained grease interceptor. If the facility is built, as proposed, we will evaluate the data obtained from the project for possible future implementation of similar structural BMPs.

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Dr. Robert P. Ghirelli  
January 13, 1994  
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At the request of the Natural Resources Defense Council, the DPW is investigating the water quality of Oxford Basin (Duck Pond) in Marina del Rey. Also, DPW field personnel have observed a continuous discharge occurring from the subdrain system in Ballona Creek, in the vicinity of Washington Boulevard. Samples taken from the discharge have resulted in very high bacteria counts which suggest the source of the discharge is raw sewage. The DPW, in conjunction with the City of Los Angeles, is conducting an investigation to locate the source of the discharge. Core samples, under the channel invert, are being taken in the vicinity of major sewer siphons to determine if they are leaking. We will keep you informed as to the progress of our investigation.

On Saturday, October 2, 1993, the DPW volunteers joined forces with other agencies and citizens to participate in the California Coastal Commission's Beach Cleanup Day.

The DPW staff gave a presentation to the Community Awareness and Emergency Response (CAER) Group on November 30, 1993. The State Industrial Activities Permit and its relationship with the Municipal Stormwater Permit was discussed. Another presentation was made to the Los Angeles County Department of Beaches and Harbors Small Craft Commission on December 8, 1993. The debris fence in Ballona Creek was the topic. A presentation by the DPW staff on watershed management was given at the October 21-23, 1993 California Water Policy Consensus Conference.

Phase I Co-Permittees wishing to provide information on the progress of their individual Permit implementation efforts have done so (Attachment B).

PHASE II SECOND-YEAR ACTIVITIES (Upper Los Angeles River and Upper San Gabriel River Drainage Basins)

The second-year tasks, as required by the Permit, have begun. This includes additional storm drain mapping and data collection, development of additional BMPs, as well as Evidence of Progress of Early Action BMPs and legal authority. Enclosed is a chart (Attachment C) summarizing the Permit submittal compliance status of second-year activities for each Co-Permittee. Also, a status chart (Attachment D) for first-year activities is included.

During this period, the DPW organized and chaired Co-Permittee meetings to coordinate permit compliance. Meeting frequency has changed from monthly to bimonthly. Enclosed is a chart (Attachment E) reflecting the attendance record of the Co-Permittees.

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Dr. Robert P. Ghirelli  
January 13, 1994  
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As required by Year-One Permit tasks, we are continuing to subdivide the Phase II drainage basins into smaller drainage areas. Due to the vast size of the Phase II drainage basins (approximately 1,110 square miles), we had previously estimated the completion of this work by December 30, 1993. However, due to the major brushfires that occurred in November, Department resources were diverted to our disaster response effort. Therefore, we have revised our estimate to January 31, 1994.

As noted under Phase I, we have revised the monitoring program and are awaiting your approval. We will be proposing a similar program for Phase II. The selection of monitoring sites is dependent on completion of the drainage area subdivision work. Also, the Permit requires the proposed monitoring program for each phase to be subject to public review prior to submittal to you. Because of this and other reasons, as discussed in the previous paragraph, we now estimate submittal of the proposed monitoring program for Phase II to you by April 30, 1994. In preparation for the establishment of the next phase of monitoring stations, we have received bids on the purchase of the sampling equipment for 15 additional stations. The award of the bid should be finalized in January 1994.

We are nearing completion of posting the "no dumping" signs at key locations adjacent to flood control channels (bike paths and local parks). To date, 180 signs have been installed with an additional 50 yet to be posted.

As a follow up to the last quarter's discovery by a DPW inspector of illegal dumping into a DPW flood control channel, the City of Arcadia sent a letter to the responsible party, American Golf Corporation Arcadia Three Par Golf Course. The letter reemphasized the significance of not dumping material into the Rio Hondo Channel.

As part of our ongoing efforts in working with the Santa Anita Racetrack to resolve water quality concerns regarding its dry weather discharges, the Racetrack has proposed redirecting its dry weather discharge to the sanitary sewer. A meeting was held on January 5, 1994, between the Racetrack, County Sanitation Districts of Los Angeles County (CSD), and the DPW to discuss the sewer connection fees. The consultant representing the Racetrack will be submitting a payment proposal to CSD for their approval.

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that are under an inspection program, and the status of your investigation of illegal dischargers or illicit connections. The list of industries should include: name of company; site address; name of contact person with telephone number; identify Standard Industrial Classification Code(s) and/or the County's own identification system for industries; and any other information which the County decides is beneficial. On December 1, 1993, Board staff presented your staff with a computer disk containing all of the Notice of Intent filers for storm water discharges from industrial sites in the County of Los Angeles as of November 1993. It would benefit both the County and the State if your staff would reconcile the list of industries in the County with our list of filers.

Monitoring Workplan

1. Your discussion of our requirement to *Develop methodology to make refined estimates of pollutants discharged to Santa Monica Bay* targeted a dynamic model selection date of December 31, 1993. Once the model selection has been made, please modify your monitoring workplan to reflect any changes necessary to the program to accommodate data input for the model. Data used in the geographic information system/modeling efforts must be compatible with Arc/Info, and available to this Board on request. Other information that must be included are:
  - 2.1.1 *Water quality data and flow data from 1980 to the present to facilitate identification of sources of pollutants present in discharges from the prioritized drainage basin. "Drainage areas" in the drainage basin are to be reported and the "drainage areas" associated with each drainage basin clearly identified;*
  - 2.1.3 *Additional information of a qualitative nature that would contribute to isolating and identifying sources of problems. Such information should include but not be limited to visual observations of factors exacerbating stormwater contamination, principal land use classifications and Standard Industrial Code (SIC) categories of facilities in "drainage areas", and a description of soils, dumps, landfills, waste disposal sites and Resource Conservation and Recovery Act (RCRA) facilities associated with each area; and,*
  - 2.1.4 *An estimate of the area of impervious surfaces (including paved areas and building roofs) within each "drainage area".*
2. Your discussion of our requirement to *Complete a basic QA/QC plan for the storm water monitoring program* did not mention a comparison of the grab vs. composite samples. On page 7 of the Monitoring Program, you state that the vertical lift for the samples will be approximately 30 feet, with a horizontal carry of approximately 100 feet. Please demonstrate that this is feasible by splitting a grab sample with water that is brought up by the pump system. This should be done

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COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS

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THOMAS A. TIDEMANSON, Director

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October 21, 1993

Dr. Robert P. Ghirelli  
Executive Officer  
California Regional Water  
Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

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Dear Dr. Ghirelli:

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT  
NO. CA0061654 (CI6948) - QUARTERLY PROGRESS REPORT

The following report is submitted in compliance with the above-captioned Permit, which was issued on June 18, 1990. This report provides a summary on the status of specific Permit tasks performed during the first quarter (July 1, 1993 through September 30, 1993) of the fourth year of the Permit which began on July 1, 1990.

PHASE I FOURTH-YEAR ACTIVITIES (Santa Monica Bay Drainage Basin)

With the onset of the fourth year of the Permit, the primary task of Phase I is to continue to implement Permit compliance activities and to report on progress. The Department of Public Works (DPW) continues to organize and chair the monthly Co-Permittee meetings to coordinate Permit compliance. Enclosed is a chart summarizing the attendance record of the Co-Permittees (Attachment A).

We have revised the Stormwater/Urban Runoff Monitoring Program based on the recommendations in your June 17, 1993 report and meetings with your staff. It was submitted to you in August and we are still awaiting your approval.

Construction has begun on the first two automated fixed-site monitoring stations in Ballona and Malibu Creeks. Automated sampling equipment has been purchased or is on order for the water quality monitoring program. Design work for the next four stations is underway. As discussed with your staff, installation of the monitoring stations is proceeding slower than expected due to a number of technical problems which arose during the design phase. The major problems involved the installation of electrical devices in enclosed environments (such as underground storm drains). According to National Electric Code requirements, electrical devices placed in such an environment must be rated explosion proof and/or intrinsically safe due to the potential accumulation of

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Dr. Robert P. Ghirelli  
October 21, 1993  
Page 3

During this period, the DPW organized and chaired Co-Permittee meetings to coordinate Permit compliance. Meeting frequency has changed from monthly to bimonthly. Enclosed is a chart (Attachment E) reflecting the attendance record of the Co-Permittees.

As required by Year-One Permit tasks, we are subdividing the Phase II drainage basins into smaller drainage areas. Due to the vast size of the Phase II drainage basins (approximately 1,110 square miles), we currently estimate the completion of this work by December 30, 1993.

As noted under Phase I, we have revised the monitoring program and are awaiting your approval. We will be proposing a similar program for Phase II. Since the Permit requires the proposed monitoring program for each phase to be subject to public review prior to submittal to you, we are not yet able to submit the monitoring program for Phase II. Also, the selection of monitoring sites is dependent on completion of the drainage area subdivision work. Therefore, we currently estimate submittal of the proposed monitoring program for Phase II to you by March 31, 1994.

We are nearing completion of posting the stormwater "no dumping" signs at key locations along flood control channel bike paths.

Among field enforcement activities during this period, a DPW field inspector discovered the dumping of weeds and grass clippings into the Rio Hondo Channel together with the washing down of the parking lot area of the Arcadia 3 Par Golf Course. The groundskeeper was instructed by the inspector to stop this practice, and follow-up contact was made with the City's Co-Permittee coordinator. The DPW recently approved the Santa Anita Racetrack Wastewater Management Study which will mitigate horse washdown water and stable runoff from discharging into Arcadia Wash.

The DPW staff attended the Rosemead City Council meeting on August 24, 1993, in a continuing effort to apprise local municipalities of the Permit and its mandates.

PHASE III FIRST-YEAR ACTIVITIES (Lower Los Angeles River, Lower San Gabriel River, and Santa Clarita Valley Drainage Basins)

Phase III cities have begun their first-year activities of submitting hydrologic/water quality data, alignment of drains, existing BMPs, identification of waste disposal facilities and industries by SIC code, proposed early action BMPs, and the required authority for regulation of the program. Enclosed is a chart (Attachment F) summarizing the Permit submittal compliance status of each Co-Permittee.

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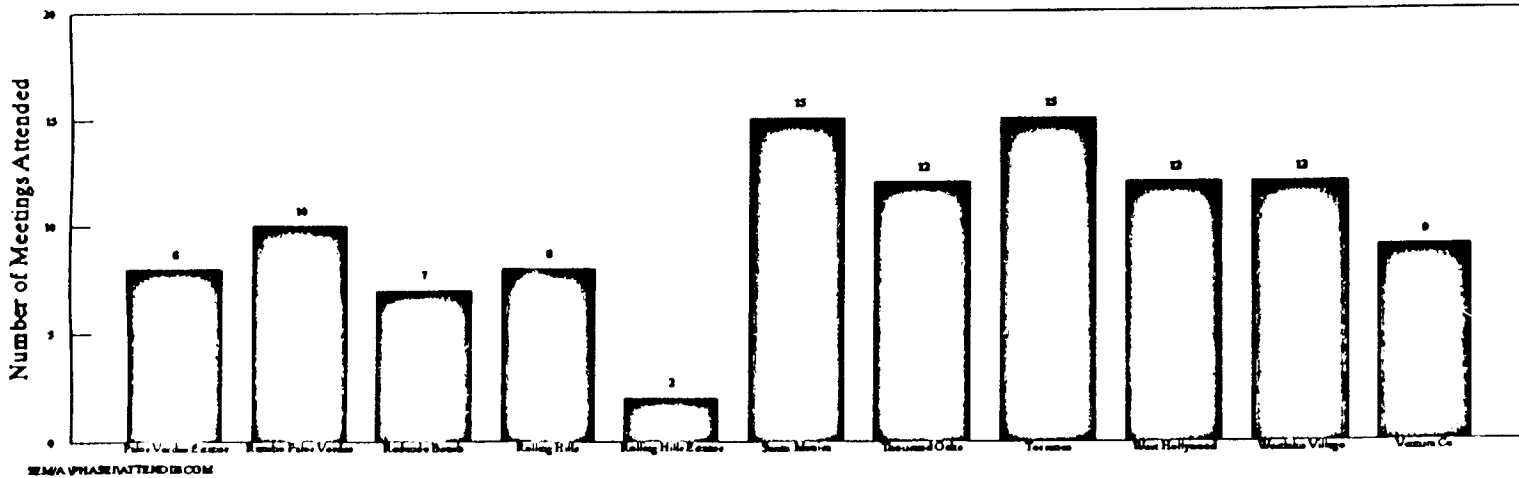
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# Phase I Agencies MONTHLY PERMITTEE MEETING ATTENDANCE

Number of Meetings to Date: 17 (April 21, 1992 to August 17, 1993)



ATTACHMENT A

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**MONTHLY PERMITTEE MEETING ATTENDANCE**  
Phase I Cities

Meeting Date	Agoura Hills	Beverly Hills	Calabasas	Caltrans	Culver City	El Segundo	Hermosa Beach	Inglewood	Los Angeles	Malibu	Manhattan Beach
April 21, 1992					1	1	1	1	1		1
May 19, 1992	1		1	1	1	1	1	1	1	1	1
June 23, 1992	1	1	1	1	1	1	1		1	1	1
July 21, 1992	1			1	1	1	1	1	1		
August 18, 1992	1	1	1			1	1	1	1	1	
September 22, 1992			1		1		1	1	1	1	1
October 20, 1992	1		1		1	1		1	1	1	
November 17, 1992		1	1		1	1		1	1	1	
January 19, 1993	1	1	1		1	1	1	1	1	1	
February 2, 1993	1	1		1	1	1		1	1		
February 16, 1993			1		1	1		1	1	1	
March 16, 1993	1	1			1				1		1
April 20, 1993		1	1		1	1	1	1	1	1	1
May 18, 1993	1	1			1	1			1	1	1
June 15, 1993	1	1	1		1	1			1	1	1
July 20, 1993	1	1	1	1	1	1	1	1	1	1	1
August 17, 1993	1	1	1		1	1	1	1	1	1	1
<b>TOTAL</b>	<b>12</b>	<b>12</b>	<b>12</b>	<b>5</b>	<b>16</b>	<b>14</b>	<b>9</b>	<b>13</b>	<b>17</b>	<b>12</b>	<b>9</b>

Meeting Date	Palos Verdes East	Rancho Palos Verdes	Redondo Beach	Rolling Hills	Rolling Hills East	Santa Monica	Thousand Oaks	Torrance	West Hollywood	Westlake Village	Ventura Co.
April 21, 1992	1	1		1		1	1	1	1		
May 19, 1992		1				1	1	1	1	1	1
June 23, 1992	1	1		1		1	1	1	1	1	
July 21, 1992	1	1	1			1	1	1	1		
August 18, 1992	1	1				1	1	1		1	
September 22, 1992						1	1	1	1	1	
October 20, 1992			1			1	1		1	1	
November 17, 1992			1			1			1	1	
January 19, 1993	1	1		1		1		1	1	1	1
February 2, 1993			1	1	1	1		1	1		1
February 16, 1993	1	1	1	1			1	1		1	1
March 16, 1993	1	1	1					1			1
April 20, 1993	1	1		1		1	1	1	1	1	1
May 18, 1993						1	1	1		1	1
June 15, 1993				1		1		1	1	1	
July 20, 1993						1	1	1			1
August 17, 1993		1	1	1	1	1	1	1	1	1	1
<b>TOTAL</b>	<b>8</b>	<b>10</b>	<b>7</b>	<b>8</b>	<b>2</b>	<b>15</b>	<b>12</b>	<b>15</b>	<b>12</b>	<b>12</b>	<b>9</b>

SEM/APHASE I ATTEND WK3

**STATUS OF YEAR 2 ACTIVITIES FOR PHASE II AGENCIES**  
as of: September 20, 1993

Dead Lines	Activities	Alhambra	Arcadia	Azusa	Baldwin Park	Breadbury	Burbank	Cala Basas	Caltrans	Claremont	Covina	Diamond Bar	Duarte	El Monte	Glendale	Glendora	Hidden Hills	Industry	Irvingdale	La Cañada Flintridge
Jul 1 1993	Identification of Manhole, Catch Basin, & Stationing Info.	06/23/93	07/01/93	10/29/92				NA	06/24/93		06/24/93		06/24/93	06/30/93		07/06/93	07/01/93	10/28/92		
	Database (3 1/2" Disk) of Size & Type of Each Drain	06/23/93		11/30/92				NA	06/24/93		06/24/93		06/24/93	06/30/93		07/07/93	07/01/93	06/14/93		
	Schedule for Database (3 1/2" Disk) of Connection Inventory	06/23/93		11/30/92	07/07/93			NA	06/24/93				06/24/93	06/30/93			07/01/93	06/14/93		
Oct. 14 1993	24 Hour Spill Response Telephone Number			08/09/93				NA						08/10/93			09/16/93	08/31/93		
Apr. 13 1994	Plan for Additional BMPs for Residential, Commercial, & Industrial							NA												
	Plan for Additional BMPs for Illegal Discharges & Disposal Practices							NA												
	Plan for Additional BMPs for Construction Sites							NA												
May 31 1994	Evidence of Progress of Implementation of Early Action BMPs							NA												
May 31 1994	Evidence of All Legal Authority for Regulation of Stormwater/Runoff							NA												

Dead Lines	Activities	La Habra	La Habra Heights	La Puente	La Verne	Los Angeles	Monrovia	Monte bello	Monterey Park	Pasadena	Pomona	Rosemead	San Dimas	San Fernando	San Gabriel	San Marino	Sierra Madre	South El Monte	South Pasadena	Temple City	Walnut	West Covina
Jul 1 1993	Identification of Manhole, Catch Basin, & Stationing Info.	06/21/93	04/12/93			NA		10/26/92			07/22/93	11/02/92		07/01/93				10/19/92			06/21/93	06/21/93
	Database (3 1/2" Disk) of Size & Type of Each Drain	06/21/93	04/12/93			NA		07/06/93	07/26/93	07/07/93	07/22/93	06/02/93		07/01/93							06/30/93	06/21/93
	Schedule for Database (3 1/2" Disk) of Connection Inventory	06/30/93	04/12/93			NA		07/06/93	07/26/93	07/07/93	07/22/93	06/02/93		07/01/93							06/30/93	06/21/93
Oct. 14 1993	24 Hour Spill Response Telephone Number					NA						06/26/93										
Apr. 13 1994	Plan for Additional BMPs for Residential, Commercial, & Industrial																					
	Plan for Additional BMPs for Illegal Discharges & Disposal Practices																					
	Plan for Additional BMPs for Construction Sites																					
May 31 1994	Evidence of Progress of Implementation of Early Action BMPs																					
May 31 1994	Evidence of All Legal Authority for Regulation of Stormwater/Runoff												06/18/93									

ATTACHMENT C

Date Received  
 Date Determined Acceptable As To Form

NA - Not applicable or agency covered under other phase

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**MONTHLY PERMITTEE MEETING ATTENDANCE**  
Phase II Cities

ATTACHMENT D

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Meeting Date	Alhambra	Arroyo	Arroyo Grande	Belmont	Burbank	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico
August 5, 1992																				
September 2, 1992																				
October 7, 1992																				
November 4, 1992																				
December 2, 1992																				
February 3, 1993																				
March 3, 1993																				
April 7, 1993																				
May 5, 1993																				
June 2, 1993																				
July 7, 1993																				
August 4, 1993																				
TOTAL	12	10	10	12	3	11	1	3	11	12	12	10	11	10	11	4	10	1	4	

Meeting Date	Alhambra	Arroyo	Arroyo Grande	Belmont	Burbank	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico	Chico
August 5, 1992																				
September 2, 1992																				
October 7, 1992																				
November 4, 1992																				
December 2, 1992																				
February 3, 1993																				
March 3, 1993																				
April 7, 1993																				
May 5, 1993																				
June 2, 1993																				
July 7, 1993																				
August 4, 1993																				
TOTAL	0	7	0	12	0	11	7	12	0	11	10	11	0	1	5	1	0	6	10	11

**STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES**

as of: September 30, 1993

Dead line	Activities	Alhambra	Arroyo	Azusa	Baldwin Park	Bradbury	Burbank	Calabasas	Caltrans	Claremont	Covina	Diamond Bar	Duarte	El Monte	Glendale	Glendora	Hidden Hills	Industry	Irwindale	La Habra	El Monte
Sep 30 1992	Submission of Existing Rainfall Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92	09/30/92
	Submission of Existing Flow Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92	09/30/92
	Submission of Existing Water Quality Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	12/02/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92	09/30/92
Oct 30 1992	Alignment of Stormdrain	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92	04/07/93	NA	06/24/93	07/14/92	10/26/92	10/29/92	10/29/92	10/26/92	08/13/92	11/02/92	11/03/92	10/26/92		11/01/92	
	Identification of Natural Drainage Watercourses	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92	04/07/93	NA	06/24/93	07/14/92	10/26/92	10/29/92	10/29/92	10/26/92	08/13/92	11/02/92	11/03/92	10/26/92		11/01/92	
	Identification of Private Drainage Systems	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92	04/07/93	NA	06/24/93	07/14/92	10/26/92	10/29/92	11/04/92	10/26/92	08/13/92	11/01/92	11/03/92	11/25/92		12/01/92	
	Definition of Drainage Boundaries	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92	04/07/93	NA	06/24/93	07/14/92	10/26/92	10/29/92	11/04/92	10/26/92	08/13/92	11/02/92	11/03/92	10/26/92		11/01/92	
Nov 30 1992	Determination of Existing BMPs for Construction Sites	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/16/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		02/01/93	
	Existing BMPs for Illegal Discharge & Disposal Practices	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/16/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		01/04/93	
	Existing BMPs for Residential, Commercial, & Industrial	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/16/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		01/04/93	
		12/31/92	12/31/92	11/30/92	12/02/92	12/31/92		NA		09/02/92	12/01/92	12/01/92	11/16/92	12/01/92	12/01/92	12/01/92	12/01/92	12/01/92	11/30/92		01/04/93
Feb. 1 1993	Identification of Waste Disposal Facilities	02/01/93	01/23/93	02/03/93	08/27/92	11/02/92	08/04/93	NA	10/14/92	07/14/92	01/26/93	01/19/93	09/17/92	01/25/93	02/18/93	01/25/93	11/03/92	01/19/93		02/01/93	
		02/31/93				11/25/92		NA	12/14/92	07/14/92	01/27/93	01/19/93	11/02/92	02/01/93	01/28/93	11/03/92	02/18/93		02/01/93		
Mar. 1 1993	Identification of Industries by SIC Code	02/17/93	11/02/92	11/30/92	02/17/93			NA	NA	02/08/93	03/04/93	02/18/93	03/11/93	03/22/93	02/03/93	01/25/93	05/11/93	02/22/93		02/01/93	
		02/17/93	02/17/93	11/30/92	02/17/93			NA	NA	02/08/93	03/04/93	02/18/93	03/11/93	03/22/93	01/27/93	05/11/93	03/02/93		02/01/93		
Apr. 1 1993	Development of Early Action BMP Plan	03/31/93	04/01/93	04/01/93	02/23/93	04/01/93		NA		03/24/91	03/24/93	03/29/93	03/31/93	03/22/93	04/12/93	03/29/93	04/05/93	04/07/93		04/06/93	
		04/31/93	04/31/93	04/01/93	04/14/93			NA		03/24/91	04/13/93	03/22/93	03/31/93	03/22/93	04/13/93	03/29/93	04/05/93	04/07/93		04/06/93	
Apr. 19 1993	Submission of Signature Block	04/22/93	04/22/93	04/22/93	04/12/93	04/26/93	04/26/93	NA	NA	04/20/93	04/19/93	04/15/93	04/22/93	04/14/93	04/22/93	04/22/93	04/26/93	04/26/93		04/26/93	
		04/22/93	04/22/93	04/22/93	04/12/93	04/26/93	04/26/93	NA	NA	04/20/93	04/19/93	04/15/93	04/22/93	04/14/93	04/22/93	04/22/93	04/26/93	04/26/93		04/26/93	
May 13 1993	Required Authority for Regulation of Stormwater/Urban Runoff	05/13/93	05/18/93	05/05/93	05/18/93		08/04/93	NA		06/01/93	05/11/93	05/11/93	06/18/93	05/04/93		07/12/93	05/18/93	05/12/93		06/21/93	
	Stormwater Permit Implementation Agreement	05/17/93	05/15/93	05/05/93	05/18/93		08/05/93	NA		06/01/93	05/11/93	05/11/93	06/18/93	05/04/93		07/13/93	05/18/93	05/17/93		06/26/93	
		05/13/93	05/25/93	05/13/93	06/24/93	06/02/93	06/22/93	NA	NA	06/01/93	05/11/93	05/06/93	05/19/93	05/11/93	05/05/93	05/13/93	05/24/93	05/18/93	06/07/93		06/21/93
	05/17/93	05/25/93	05/17/93	06/24/93	06/02/93	06/22/93	NA	NA	06/01/93	05/11/93	05/10/93	05/20/93	05/17/93	05/05/93	05/13/93	05/24/93	05/18/93	06/07/93		06/26/93	

ATTACHMENT D

Date Received  
 Date Determined Acceptable As To Form


NA = Not applicable or agency covered under other phase

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**STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES**  
as of: September 20, 1993

Lead Agency	Activities	La Habra Heights	La Puente	La Verne	Los Angeles	Morroville	Montebello	Monterey Park	Pasadena	Pomona	Rosemead	San Dimas	San Fernando	San Gabriel	San Marino	Sierra Madre	South El Monte	South Pasadena	Temple City	Walnut	West Covina
Sep 92	Submittal of Existing Rainfall Data	09/23/92	02/04/93	09/14/92	06/27/91	08/17/92	09/14/92	09/14/92	09/21/92	10/06/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	10/13/92	08/12/92	10/20/92	08/26/92	09/30/92	09/15/92
	Submittal of Existing Flow Data	09/23/92	02/04/93	09/14/92	08/08/91	08/17/92	09/14/92	09/14/92	09/21/92	10/06/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	10/13/92	08/12/92	10/20/92	08/26/92	09/30/92	09/15/92
	Submittal of Existing Water Quality Data	09/23/92	02/04/93	09/14/92	09/30/92	08/17/92	09/14/92	09/14/92	09/21/92	10/06/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	10/13/92	08/12/92	10/20/92	08/26/92	09/30/92	09/15/92
Oct 92	Alignment of Stormdrain	10/29/92	02/17/93	11/23/92	10/26/92	10/26/92	11/02/92	11/03/92	11/16/92	11/02/92	11/25/92	07/29/92	10/28/92		12/01/92	10/19/92	11/12/92	10/29/92	11/01/92	11/01/92	07/25/92
	Identification of Natural Drainage Watercourses	10/29/92	02/17/93	11/23/92	10/26/92	10/27/92	11/02/92	11/03/92	11/16/92	11/02/92	11/25/92	07/29/92	10/28/92		12/01/92	10/19/92	11/12/92	10/29/92	11/01/92	11/01/92	07/25/92
	Identification of Private Drainage Systems	10/29/92	02/17/93	11/23/92	10/26/92	10/27/92	11/04/92	11/04/92	11/03/92	11/16/92	11/02/92	11/25/92	07/29/92	11/24/92		12/01/92		11/12/92	11/04/92	11/01/92	03/01/93
	Definition of Drainage Boundaries	10/29/92	02/17/93	11/23/92	10/26/92	10/26/92	11/02/92	11/02/92	11/03/92	11/16/92	11/02/92	11/25/92	10/20/92	12/03/92		04/07/93	10/19/92	11/12/92	11/16/92	11/25/92	07/25/92
Nov 92	Determination of Existing BMPs for Construction Sites	12/01/92	02/17/93	12/02/92	03/13/90	11/25/92	11/30/92	11/30/92	12/02/92	12/02/92	11/30/92	01/09/92	11/24/92	11/30/92		11/24/92	11/30/92		11/16/92	11/30/92	01/05/93
	Existing BMPs for Illegal Discharge & Disposal Practices	12/01/92	02/17/93	12/02/92	03/13/90	11/25/92	11/30/92	11/30/92	12/02/92	12/02/92	12/31/92	01/14/92	11/24/92	12/01/92		11/24/92	12/01/92		11/16/92	11/30/92	01/05/93
	Existing BMPs for Residential, Commercial, & Industrial	12/01/92	02/17/93	12/02/92	05/10/92	11/25/92	11/30/92	11/30/92	12/02/92	12/02/92	11/30/92	09/09/92	11/24/92	11/30/92		11/24/92	11/30/92		11/16/92	11/30/92	01/05/93
Nov 92	Identification of Waste Disposal Facilities	09/21/92	02/04/93	12/07/92	07/03/92	02/02/93	01/27/93	02/18/93	09/21/92	02/03/93	02/03/93	09/09/92	10/01/92	01/20/93		11/24/92			08/04/93	10/30/92	11/05/92
	Identification of Industries by SIC Code	12/02/92	02/04/93	03/08/93	12/08/92	10/26/92	01/27/93	03/09/93	03/08/93	04/15/93	02/08/93	03/04/93	01/19/93	02/17/93					06/04/93	11/16/92	12/02/92
Apr 93	Development of Early Action BMP Plan	03/31/93	03/31/93	03/30/93	04/05/93	04/05/93	04/07/93	04/22/93	03/23/93	04/12/93	04/05/93	04/12/93	04/01/93	03/31/93						03/31/93	03/21/93
		04/01/93	04/01/93	03/31/93	04/05/93	04/05/93	04/07/93	04/22/93	04/07/93	04/12/93	04/05/93	04/12/93	04/01/93	03/31/93						04/06/93	04/01/93
Apr 93	Submittal of Signature Block	04/12/93	04/12/93	04/20/93	NA	04/22/93	04/19/93	04/22/93	04/12/93	04/22/93	04/12/93	04/21/93	04/15/93	04/21/93						04/26/93	04/12/93
		04/12/93	04/12/93	04/20/93	NA	04/22/93	04/19/93	04/22/93	04/12/93	04/22/93	04/12/93	04/21/93	04/15/93	04/21/93						04/26/93	04/12/93
May 93	Required Authority for Regulation of Stormwater/Urban Runoff	04/28/93	04/28/93	05/18/93	06/20/91		07/06/93	05/13/93	05/13/93	06/02/93	05/11/93		06/08/93	05/12/93						04/29/93	05/17/93
		04/28/93	04/28/93	05/24/93	10/19/92		07/06/93	05/13/93	05/13/93	06/02/93	05/11/93		06/08/93	05/12/93						04/29/93	05/17/93
May 93	Stormwater Permit Implementation Agreement	05/18/93	06/02/93	05/18/93	NA	08/04/93	05/25/93		06/17/93	06/02/93	08/30/93	05/25/93		05/12/93	05/18/93	06/24/93	06/06/93			05/20/93	06/21/93
		05/18/93	06/02/93	05/24/93	NA	08/25/93	05/25/93		06/17/93	06/02/93	08/30/93	05/25/93		05/12/93	05/18/93	06/24/93	06/06/93			05/20/93	06/21/93

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NA - Not applicable or agency covered under other phase



**STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES**

as of: November 15, 1993

Dead- lines	Activities	Paramount	Pasadena	Pico Rivera	Rancho Palos Verdes	Redondo Beach	Rolling Hills	Rolling Hills Est.	Santa Clarita	Santa Fe Springs	Signal Hill	South Gate	South Pasadena	Torrance	Vernon	Whittier
	Letter of Intent	06/08/93	NA	06/24/93	NA	NA	NA	NA	06/14/93	08/19/93	06/21/93	06/24/93	NA	NA	06/08/93	06/21/93
Sep. 30, 1993	Submittal of Existing Rainfall Data	09/20/93	NA	09/07/93			NA		09/27/93	09/21/93	08/31/93	09/16/93	NA		09/21/93	09/08/93
	Submittal of Existing Flow Data	09/20/93	NA	09/07/93			NA		09/27/93	09/21/93	08/31/93	08/23/93	NA		09/21/93	09/08/93
	Submittal of Existing Water Quality Data	09/20/93	NA	09/07/93			NA		09/27/93	09/21/93	08/31/93	08/23/93	NA		09/21/93	09/08/93
	24 Hour Spill Response Telephone Number	09/07/93	NA	10/28/93			NA		10/27/93	10/18/93	08/31/93	09/29/93	NA		10/28/93	09/08/93
Oct. 29, 1993	Alignment of Stormdrain	10/27/93	NA	10/28/93			NA		10/27/93	10/27/93	11/01/93	10/27/93	NA	11/03/93	10/28/93	10/27/93
	Identification of Natural Drainage Watercourses	10/27/93	NA	10/28/93			NA		10/27/93	10/27/93	11/01/93	10/27/93	NA	11/03/93	10/28/93	10/27/93
	Identification of Private Drainage Systems	10/27/93	NA	10/28/93			NA		10/27/93	10/27/93	11/01/93	10/27/93	NA	11/03/93	10/28/93	10/27/93
	Definition of Drainage Boundaries	10/27/93	NA	10/28/93			NA		10/27/93	10/27/93	11/01/93	10/27/93	NA	11/03/93	10/28/93	10/27/93
	Determination of Existing BMPs for Construction Sites		NA				NA						NA			
Nov. 3, 1993	Existing BMPs for Illegal Discharge & Disposal Practices		NA				NA						NA			
	Existing BMPs for Residential, Commercial, & Industrial		NA				NA						NA			
	Identification of Waste Disposal Facilities	09/20/93	NA	09/07/93			NA		10/14/93				NA			
Feb. 1, 1994	Identification of Industries by SIC Code	09/29/93	NA	10/13/93			NA		10/18/93				NA			
			NA	09/07/93			NA				08/24/93	09/13/93	NA			
Mar. 31, 1994	Development of Early Action BMP Plan		NA				NA						NA			
			NA				NA						NA			
May 12, 1994	Required Authority for Regulation of Stormwater/Urban Runoff		NA	09/07/93			NA					11/15/93	NA			
			NA	09/07/93			NA					11/15/93	NA			
	Stormwater Permit Implementation Agreement		NA	06/24/93			NA					09/29/93	NA	NA		
			NA	06/24/93			NA					08/28/93	NA	NA		

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**STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES**

as of: November 15, 1993

Dead Lines	Activities	Hawthorne	Huntington Park	Inglewood	La Cañada Flintridge	La Habra Heights	La Mirada	Lakewood	Lawr.date	Lomita	Long Beach	Los Angeles	Lynwood	Maywood	Montebello	Norwalk	Palos Verdes Estates
	Letter of Intent	02/03/93	02/01/93	NA	04/22/93	NA	07/21/93	06/30/93	06/21/93	06/14/93	06/10/93	NA	06/21/93	06/30/93	NA	06/24/93	NA
Sep. 23 1993	Submittal of Existing Rainfall Data	08/16/93	08/05/93	NA	08/05/93		09/29/93	09/29/93	09/28/93		09/27/93	06/27/91	09/08/93	08/25/93	NA	09/13/93	NA
	Submittal of Existing Flow Data	08/16/93	08/05/93	NA	08/05/93		09/29/93	09/29/93	09/28/93		09/27/93	09/22/93	09/08/93	08/25/93	NA	09/13/93	NA
	Submittal of Existing Water Quality Data	08/16/93	08/05/93	NA	08/05/93		09/29/93	09/29/93	09/28/93		09/27/93	09/22/93	09/08/93	08/25/93	NA	09/13/93	NA
	24 Hour Spill Response Telephone Number	11/08/93	10/05/93	NA	10/14/93			11/10/93	10/28/93		09/27/93	07/07/93		09/16/93	NA	10/18/93	NA
Oct. 28 1993	Alignment of Stormdrain	10/27/93	10/05/93	NA	10/18/93		10/27/93	10/27/93	10/28/93		10/27/93	10/27/93		10/28/93	NA	10/27/93	NA
	Identification of Natural Drainage Watercourses	10/27/93	08/05/93	NA	10/18/93		10/27/93	10/27/93	10/28/93		10/27/93	10/27/93		10/28/93	NA	10/27/93	NA
	Identification of Private Drainage Systems	10/27/93	08/05/93	NA	10/18/93		10/27/93	10/27/93	10/28/93		10/27/93	10/27/93		10/28/93	NA	10/27/93	NA
	Detrusion of Drainage Boundaries	10/27/93	10/05/93	NA	10/18/93		10/27/93	10/27/93	10/28/93		10/27/93	10/27/93		10/28/93	NA	10/27/93	NA
Nov. 30 1993	Determination of Existing BMPs for Construction Sites			NA											NA		NA
	Existing BMPs for Illegal Discharge & Disposal Practices			NA											NA		NA
	Existing BMPs for Residential, Commercial, & Industrial			NA											NA		NA
	Identification of Waste Disposal Facilities			NA									09/08/93		NA		NA
Mar. 1 1994	Identification of Industries by SIC Code		10/05/93	NA				11/10/93				10/27/93		09/08/93		NA	NA
	Development of Early Action BMP Plan		10/05/93	NA				11/10/93				10/27/93		09/08/93		NA	NA
May 12 1994	Required Authority for Regulation of Stormwater/Urban Runoff			NA											NA		NA
	Stormwater Permit Implementation Agreement			NA				10/04/93							NA		NA
				NA				10/04/93							NA		NA

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 Date Determined Acceptable As To Form

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**STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES**

as of: November 15, 1993

Dead Lines	Activities	Alhambra	Arcadia	Azusa	Baldwin Park	Bradbury	Burbank	Calabasas	Caltrans	Claremont	Covina	Diamond Bar	Duarte	El Monte	Glendale	Glendora	Hidden Hills	Industry	Irwindale	LaCañada Flintridge	
Sep 30 1992	Submittal of Existing Rainfall Data	09/30/92	09/21/92	09/17/92	09/13/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/03/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92	
	Submittal of Existing Flow Data	09/30/92	09/21/92	09/17/92	09/16/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/03/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92	
	Submittal of Existing Water Quality Data	09/30/92	09/21/92	09/17/92	09/16/92	10/07/92	12/02/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/03/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92	
Oct 30 1992	Alignment of Stormdrain	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92	04/07/93	NA	06/24/93	07/14/92	10/26/92	10/29/92	10/29/92	10/26/92	08/13/92	11/02/92	11/03/92	10/28/92		11/03/92	
	Identification of Natural Drainage Watercourses	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92	04/07/93	NA	06/24/93	07/14/92	10/26/92	10/29/92	10/29/92	10/26/92	08/13/92	11/02/92	11/03/92	10/28/92		11/03/92	
	Identification of Private Drainage Systems	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92	04/07/93	NA	06/24/93	07/14/92	10/26/92	10/29/92	11/04/92	10/26/92	08/13/92	11/01/92	11/03/92	11/25/92		12/03/92	
	Definition of Drainage Boundaries	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92	04/07/93	NA	06/24/93	07/14/92	10/26/92	10/29/92	11/03/92	10/26/92	08/13/92	11/02/92	11/03/92	11/25/92		11/03/92	
Nov 30 1992	Determination of Existing BMPs for Construction Sites	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		02/03/93	
	Existing BMPs for Illegal Discharge & Disposal Practices	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		01/04/93	
	Existing BMPs for Residential, Commercial, & Industrial	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		01/04/93	
Feb 1 1993	Identification of Waste Disposal Facilities	02/01/93	01/28/93	02/03/93	08/27/92	11/02/92	08/04/93	NA	10/14/92	07/14/92	01/26/93	01/19/93	09/17/92	01/25/93	02/18/93	01/25/93	11/03/92	01/19/93		02/03	
	Identification of Industries by SIC Code	02/17/93	11/02/92	11/30/92	02/17/93	11/09/93		NA	NA	02/08/93	03/04/93	02/18/93	03/11/93	03/22/93	02/03/93	01/25/93	05/11/93	02/22/93		02/03/93	
Apr 1 1993	Development of Early Action BMP Plan	03/31/93	04/01/93	04/01/93	02/23/93	04/01/93		NA		03/24/91	03/24/93	03/29/93	03/31/93	03/22/93	04/12/93	03/29/93	04/05/93	04/07/93		04/06/93	
	Submittal of Signature Block	04/22/93	04/22/93	04/22/93	04/12/93	04/26/93	04/26/93	NA	NA	04/20/93	04/19/93	04/15/93	04/22/93	04/14/93	04/22/93	04/22/93	04/26/93	04/26/93		04/26/93	
May 13 1993	Required Authority for Regulation of Stormwater/Urban Runoff	05/13/93	05/18/93	05/05/93	05/18/93		08/04/93	NA		06/01/93	05/11/93	05/11/93	06/18/93	05/04/93		07/12/93	05/18/93	05/12/93		06/23/93	
	Stormwater Permit Implementation Agreement	05/17/93	05/16/93	05/05/93	05/18/93		08/05/93	NA		06/01/93	05/11/93	05/11/93	06/19/93	05/04/93		07/13/93	05/18/93	05/17/93		06/28/93	
		05/13/93	05/25/93	05/13/93	08/24/93	06/02/93	06/22/93	NA		06/01/93	05/11/93	05/06/93	05/19/93	05/05/93	05/05/93	05/13/93	05/24/93	05/18/93	06/07/93		06/23/93
		05/17/93	05/25/93	05/17/93	08/24/93	06/02/93	06/22/93	NA		06/08/93	05/11/93	05/10/93	05/20/93	05/17/93	05/05/93	05/13/93	05/24/93	05/18/93	06/07/93		06/26/93

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**STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES**

as of: November 15, 1993

Dead- lines	Activities	Alhambra	Artesia	Bell	Bell Gardens	Bell- flower	Caltrans	Carson	Cerritos	Commerce	Compton	Cudahy	Downey	El Segundo	Gardena	Glendale	Hawaiian Gardens
	Letter of Intent	NA	09/16/93	06/24/93	06/23/93	06/21/93	NA	06/09/93	06/24/93	06/08/93	07/28/93	06/21/93	06/21/93	NA	08/05/93	NA	07/01/93
Sep. 30 1993	Submittal of Existing Rainfall Data	NA		08/31/93	09/21/93	08/03/93	09/22/93	08/31/93	09/22/93			08/25/93	08/25/93		09/28/93	NA	
		NA		08/31/93	09/21/93	08/05/93	09/27/93	08/31/93	09/27/93			08/25/93	08/25/93		09/28/93	NA	
	Submittal of Existing Flow Data	NA		08/31/93	09/21/93	08/03/93	09/22/93	08/31/93	09/22/93			08/25/93	08/25/93		09/28/93	NA	
		NA		08/31/93	09/21/93	08/05/93	09/27/93	08/31/93	09/27/93			08/25/93	08/25/93		09/28/93	NA	
	Submittal of Existing Water Quality Data	NA		08/31/93	09/21/93	08/03/93	09/22/93	08/31/93	09/22/93			08/25/93	08/25/93		09/28/93	NA	
		NA		08/31/93	09/21/93	08/05/93	09/27/93	08/31/93	09/27/93			08/25/93	08/25/93		09/28/93	NA	
Oct. 14 1993	24 Hour Spill Response	NA		09/07/93	09/07/93	09/27/93	08/30/93	10/27/93	10/04/93	11/08/93	11/08/93	09/16/93				NA	
	Telephone Number	NA		09/07/93	09/07/93	09/27/93	08/30/93	10/27/93	10/05/93	11/08/93	11/08/93	09/16/93				NA	
Oct. 28 1993	Alignment of Stormdrain	NA		10/28/93	10/27/93	09/27/93			11/03/93		10/07/93	10/28/93	10/27/93		10/07/93	NA	
		NA		11/02/93	11/01/93	10/06/93			11/03/93		10/07/93	11/02/93	11/01/93		10/07/93	NA	
	Identification of Natural Drainage Watercourses	NA		10/28/93	10/27/93	09/27/93			11/03/93		10/07/93	10/28/93	10/27/93		10/07/93	NA	
		NA		11/02/93	11/01/93	10/06/93			11/03/93		10/07/93	11/02/93	11/01/93		10/07/93	NA	
	Identification of Private Drainage Systems	NA		10/28/93	10/27/93	09/27/93			11/03/93		10/07/93	10/28/93	10/27/93		10/07/93	NA	
		NA		11/02/93	11/01/93	10/06/93			11/03/93		10/07/93	11/02/93	11/01/93		10/14/93	NA	
Nov. 30 1993	Definition of Drainage Boundaries	NA		10/28/93	10/27/93	09/27/93			11/03/93		10/07/93	10/28/93	10/27/93		10/07/93	NA	
		NA		11/02/93	11/02/93	10/06/93			11/03/93		10/07/93	11/02/93	11/01/93		10/07/93	NA	
Nov. 30 1993	Determination of Existing BMPs for Construction Sites	NA														NA	
	Existing BMPs for Illegal Discharge & Disposal Practices	NA														NA	
	Existing BMPs for Residential, Commercial, & Industrial	NA														NA	
		NA														NA	
Feb. 1 1994	Identification of Waste Disposal Facilities	NA			09/21/93	11/01/93			11/09/93							NA	
		NA				11/01/93			11/09/93							NA	
Mar. 1 1994	Identification of Industries by SIC Code	NA														NA	
		NA														NA	
Mar. 31 1994	Development of Early Action BMP Plan	NA														NA	
		NA														NA	
May 12 1994	Required Authority for Regulation of Stormwater/Urban Runoff	NA														NA	
		NA														NA	
	Stormwater Permit Implementation Agreement	NA			11/09/93											NA	
		NA			11/09/93											NA	

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**STATUS OF YEAR 1 ACTIVITIES FOR PHASE II AGENCIES**

as of: November 15, 1993

Dead- lines	Activities	La Habra Heights	La Puente	La Verne	Los Angeles	Monrovia	Monte-bello	Monterey Park	Paso-ena	Pomona	Rose-mead	San Dimas	San Fernando	San Gabriel	San Marino	Sierra Madre	South El Monte	South Pasadena	Temple City	Walnut	West Covina	
Sep 30 1992	Submittal of Existing Rainfall Data	09/23/92	02/04/93	09/14/92	06/27/91	08/17/92	09/14/92	09/14/92	09/21/92	10/06/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	10/13/92	08/12/92	10/20/92	08/26/92	09/30/92	09/15/92	
		09/24/92	02/06/93	09/14/92	10/05/92	08/20/92	09/14/92	09/14/92	09/21/92	10/06/92	09/22/92	09/14/92	10/05/92	09/29/92	10/07/92	10/13/92	08/20/92	10/20/92	10/06/92	09/30/92	09/15/92	
	09/23/92	02/04/93	09/14/92	08/08/91	08/17/92	09/14/92	09/14/92	09/21/92	10/06/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	10/13/92	08/12/92	10/20/92	08/26/92	09/30/92	09/15/92		
Oct 30 1992	Alignment of Stormdrain	10/29/92	02/17/93	11/23/92	10/28/92	10/26/92	10/26/92	11/02/92	11/03/92	11/16/92	11/02/92	11/25/92	07/29/92	10/28/92		12/01/92	10/19/92	11/12/92	10/29/92	11/01/92	07/28/92	
		11/03/92	03/02/93	11/25/92	10/29/92	10/27/92	10/27/92	11/03/92	11/03/92	11/16/92	11/02/92	11/25/92	11/02/92	10/29/92		12/01/92	10/26/92	11/16/92	11/02/92	11/02/92	10/06/92	
	10/29/92	02/17/93	11/23/92	10/28/92	10/26/92	10/26/92	11/02/92	11/03/92	11/16/92	11/02/92	11/25/92	07/29/92	10/28/92		12/01/92	10/19/92	11/12/92	10/29/92	11/01/92	07/28/92		
Nov 30 1992	Identification of Natural Drainage Watercourses	11/03/92	03/02/93	11/25/92	10/29/92	10/27/92	10/27/92	11/03/92	11/03/92	11/16/92	11/02/92	11/25/92	09/15/92	10/29/92		12/01/92	10/26/92	11/16/92	11/02/92	11/02/92	10/06/92	
		10/29/92	02/17/93	11/23/92	10/28/92	10/26/92	11/04/92	11/02/92	11/03/92	11/16/92	11/02/92	11/25/92	07/29/92	11/24/92		12/01/92		11/12/92	11/04/92	11/01/92	03/03/93	
	11/03/92	03/02/93	11/25/92	10/29/92	10/27/92	11/04/92	11/04/92	11/03/92	11/16/92	11/02/92	11/25/92	09/15/92	11/24/92		12/01/92		11/16/92	11/04/92	11/02/92	03/29/93		
Nov 30 1992	Definition of Drainage Boundaries	10/29/92	02/17/93	11/23/92	10/28/92	10/26/92	10/26/92	11/02/92	11/03/92	11/16/92	11/02/92	11/25/92	10/20/92	12/03/92		04/07/93	10/19/92	11/12/92	11/16/92	11/25/92	07/28/92	
		11/03/92	03/02/93	11/25/92	10/29/92	10/27/92	10/27/92	11/02/92	11/03/92	11/16/92	11/02/92	11/25/92	11/02/92	12/03/92		04/12/93	10/26/92	11/16/92	11/17/92	11/25/92	10/06/92	
	12/01/92	02/17/93	12/02/92	03/13/90	11/25/92	11/30/92	11/30/92	12/02/92	12/02/92	12/02/92	12/01/92	09/09/92	11/24/92	11/30/92		11/24/92	11/30/92		11/16/92	11/30/92	01/05/93	
Feb 1 1993	Determination of Existing BMPs for Construction Sites	12/01/92	02/17/93	12/02/92	03/13/90	11/25/92	11/30/92	11/30/92	12/02/92	12/02/92	12/02/92	12/01/92	09/14/92	11/24/92	12/01/92		11/24/92	12/01/92		11/17/92	11/30/92	01/05/93
		12/01/92	02/17/93	12/02/92	03/13/90	11/25/92	11/30/92	11/30/92	12/02/92	12/02/92	12/02/92	12/01/92	09/09/92	11/24/92	12/01/92		11/24/92	12/01/92		11/17/92	11/30/92	01/05/93
	12/01/92	02/17/93	12/02/92	03/13/90	11/25/92	11/30/92	11/30/92	12/02/92	12/02/92	12/02/92	12/01/92	09/14/92	11/24/92	12/01/92		11/24/92	12/01/92		11/17/92	11/30/92	01/05/93	
Mar 1 1993	Existing BMPs for Illegal Discharge & Disposal Practices	12/01/92	02/17/93	12/02/92	05/10/92	11/25/92	11/30/92	11/30/92	12/02/92	12/02/92	11/30/92	09/09/92	11/24/92	11/30/92		11/24/92	11/30/92		11/16/92	11/30/92	01/05/93	
		12/01/92	02/17/93	12/02/92	05/10/92	11/25/92	11/30/92	11/30/92	12/02/92	12/02/92	12/02/92	09/09/92	11/24/92	11/30/92		11/24/92	11/30/92		11/16/92	11/30/92	01/05/93	
	12/01/92	02/17/93	12/02/92	05/10/92	11/25/92	11/30/92	11/30/92	12/02/92	12/02/92	12/02/92	09/09/92	11/24/92	11/30/92		11/24/92	11/30/92		11/16/92	11/30/92	01/05/93		
Apr 1 1993	Existing BMPs for Residential, Commercial, & Industrial	12/01/92	02/17/93	12/02/92	10/13/92	11/25/92	12/01/92	12/01/92	12/02/92	12/02/92	12/01/92	09/14/92	11/24/92	12/01/92		11/25/92	12/01/92		11/17/92	11/30/92	01/05/93	
		12/01/92	02/17/93	12/02/92	10/13/92	11/25/92	12/01/92	12/01/92	12/02/92	12/02/92	12/01/92	09/14/92	11/24/92	12/01/92		11/25/92	12/01/92		11/17/92	11/30/92	01/05/93	
	12/01/92	02/17/93	12/02/92	10/13/92	11/25/92	12/01/92	12/01/92	12/02/92	12/02/92	12/01/92	09/14/92	11/24/92	12/01/92		11/25/92	12/01/92		11/17/92	11/30/92	01/05/93		
Feb 1 1993	Identification of Waste Disposal Facilities	09/23/92	02/04/93	09/14/92	07/03/92	02/02/93	01/27/93	02/18/93	09/21/92	02/03/93	02/03/93	09/09/92	10/01/92	01/20/93		11/24/92		08/04/93	10/30/92	11/30/92	09/15/92	
		10/05/92	02/06/93	02/04/93	10/19/92	04/05/93	01/29/93			02/08/93	02/24/93	03/02/93		10/19/92	01/20/93		11/25/92		11/02/92	11/30/92	02/04/93	
Mar 1 1993	Identification of Industries by SIC Code	12/02/92	02/04/93	03/08/93	12/08/92	10/26/92	01/27/93	03/09/93	03/08/93	04/15/93	02/08/93	03/04/93	01/19/93	02/17/93				08/04/93	11/16/92	12/02/92	03/08/93	
		12/03/92	02/06/93	03/10/93	12/08/92	10/27/92	01/27/93	03/09/93	03/09/93	04/15/93	02/09/93	03/06/93	01/19/93	02/17/93				08/05/93	11/16/92	12/03/92	03/08/93	
Apr 1 1993	Development of Early Action BMP Plan	03/31/93	03/31/93	03/30/93	04/05/93	04/05/93	04/07/93	04/22/93	03/23/93	04/12/93	04/05/93	04/12/93	04/01/93	03/31/93		04/06/93	04/01/93			03/31/93	03/29/93	
		04/01/93	04/01/93	03/31/93	04/05/93	04/05/93	04/07/93	04/22/93	04/07/93	04/12/93	04/05/93	04/12/93	04/01/93	03/31/93		04/06/93	04/01/93				04/01/93	04/01/93
Apr 19 1993	Submittal of Signature Block	04/12/93	04/12/93	04/20/93		04/22/93	04/19/93	04/22/93	04/12/93	04/22/93	04/12/93	04/21/93	04/15/93	04/21/93	04/26/93	04/26/93	04/22/93		04/26/93	04/12/93	04/12/93	
		04/12/93	04/12/93	04/20/93		04/22/93	04/19/93	04/22/93	04/12/93	04/22/93	04/12/93	04/21/93	04/15/93	04/21/93	04/26/93	04/26/93	04/22/93		04/26/93	04/12/93	04/12/93	
May 13 1993	Required Authority for Regulation of Stormwater/Urban Runoff	04/28/93	04/28/93	05/18/93	06/20/91		07/06/93	05/13/93	05/13/93	06/02/93	05/11/93		06/08/93	05/12/93						04/28/93	05/17/93	
		04/28/93	04/28/93	05/24/93	10/19/92		07/06/93	05/17/93	15/17/93	06/08/93	05/11/93		06/08/93	05/11/93						04/28/93	05/17/93	
	05/18/93	06/02/93	05/18/93		08/04/93	05/25/93	11/04/93	06/17/93	06/02/93	08/30/93	05/25/93		05/12/93	05/18/93	06/24/93	06/08/93	10/05/93		05/20/93	06/21/93		
May 13 1993	Stormwater Permit Implementation Agreement	05/18/93	06/02/93	05/18/93		08/04/93	05/25/93	11/04/93	06/17/93	06/02/93	08/30/93	05/25/93		05/12/93	05/18/93	06/24/93	06/08/93	10/05/93		05/20/93	06/21/93	
		05/18/93	06/02/93	05/24/93		08/25/93	05/25/93	11/04/93	06/17/93	06/08/93	08/30/93	05/25/93		05/12/93	05/18/93	06/24/93	06/08/93	10/05/93		05/20/93	06/21/93	

Data Received  
 Date Determined Acceptable As To Form

NA = Not applicable or agency covered under other phase

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**STATUS OF YEAR 2 ACTIVITIES FOR PHASE II AGENCIES**  
as of: November 15, 1993

Dead lines	Activities	Alhambra	Arcadia	Azusa	Baldwin Park	Bradbury	Burbank	Calabasas	Caltrans	Claremont	Covina	Diamond Bar	Duarte	El Monte	Glendale	Glendora	Hidden Hills	Industry	Irwindale	La Habra Flintridge
Jul 1 1993	Identification of Manhole, Catch Basin, & Stationing Info	06/23/93	07/01/93	10/29/92		11/09/93		NA	06/24/93		06/24/93		06/24/93	06/30/93		07/06/93	07/01/93	10/28/92		
	Database (3 1/2" Disk) of Size & Type of Each Drain	06/23/93		11/30/92		11/09/93		NA	06/24/93		06/24/93		06/24/93	06/30/93		07/07/93	07/01/93	06/14/93		
	Schedule for Database (3 1/2" Disk) of Connection Inventory	06/23/93		11/30/92	07/07/93	11/09/93		NA	06/24/93				06/24/93	06/30/93			07/01/93	06/14/93		
Oct 14 1993	24 Hour Spill Response Telephone Number	03/27/93	09/27/93	08/09/93	10/05/93	11/09/93	10/27/93	NA		10/12/93	10/14/93		10/14/93	08/10/93		10/12/93	09/16/93	09/31/93	11/08/93	10/14/93
Apr 13 1994	Plan for Additional BMPs for Residential, Commercial, & Industrial							NA												
	Plan for Additional BMPs for Illegal Discharges & Disposal Practices							NA												
	Plan for Additional BMPs for Construction Sites							NA												
May 31 1994	Evidence of Progress of Implementation of Early Action BMPs							NA												
May 31 1994	Evidence of All Legal Authority for Regulation of Stormwater/Runoff							NA												

Dead lines	Activities	La Habra	La Puente	La Verne	Los Angeles	Monrovia	Montebello	Monterey Park	Pasadena	Pomona	Rosemead	San Dimas	San Fernando	San Gabriel	San Marino	Sierra Madre	South El Monte	South Pasadena	Temple City	Walnut	West Covina
Jul 1 1993	Identification of Manhole, Catch Basin, & Stationing Info	06/21/93	04/12/93		NA		10/26/92			07/22/93	11/02/92		07/01/93				10/19/92			06/21/93	06/21/93
	Database (3 1/2" Disk) of Size & Type of Each Drain	06/30/93	04/12/93		NA		07/06/93	07/26/93	07/07/93	07/22/93	06/02/93		07/01/93							06/30/93	
	Schedule for Database (3 1/2" Disk) of Connection Inventory	06/30/93	04/12/93		NA		07/06/93	07/26/93	07/07/93	07/22/93	06/02/93		07/01/93							06/30/93	
Oct 14 1993	24 Hour Spill Response Telephone Number		11/15/93	09/21/93	NA				11/06/93		10/14/93	10/12/93									11/06/93
Apr 13 1994	Plan for Additional BMPs for Residential, Commercial, & Industrial																				
	Plan for Additional BMPs for Illegal Discharges & Disposal Practices																				
	Plan for Additional BMPs for Construction Sites																				
May 31 1994	Evidence of Progress of Implementation of Early Action BMPs																				
May 31 1994	Evidence of All Legal Authority for Regulation of Stormwater/Runoff											08/16/93	10/12/93								11/06/93

Date Received  
 Date Determined Acceptable As To Form

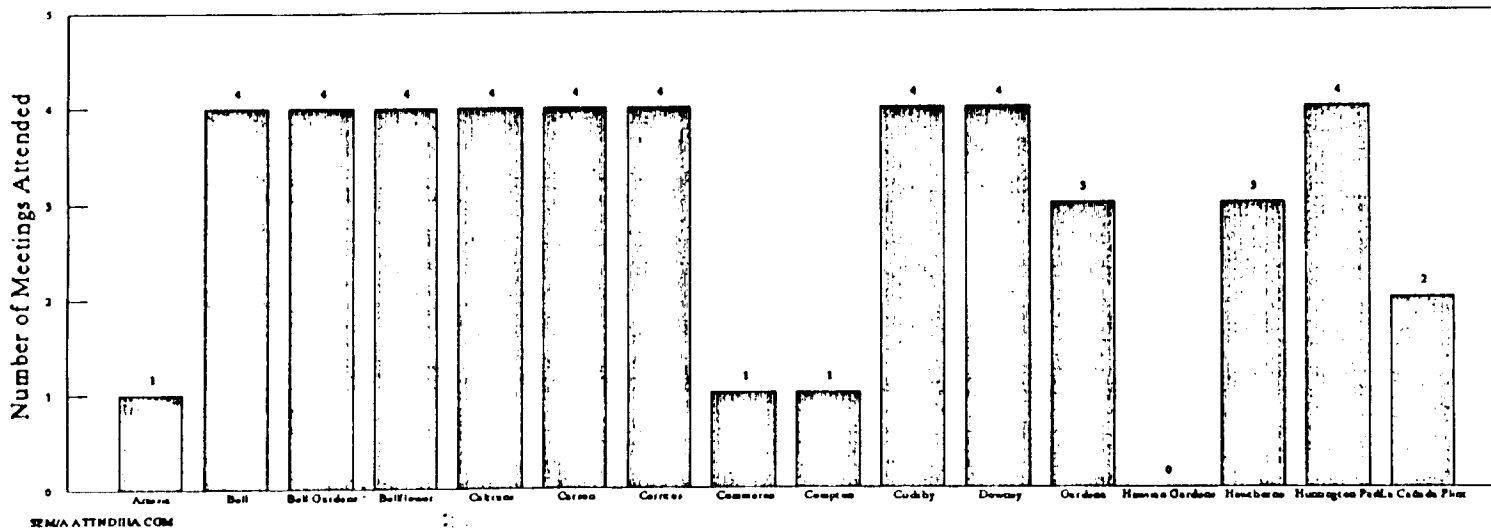
NA = Not applicable or agency covered under other phase

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# Phase III Agencies MONTHLY PERMITTEE MEETING ATTENDANCE

Number of Meetings to Date: 4 (July 28, 1993 to October 27, 1993)



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**MONTHLY PERMITTEE MEETING ATTENDANCE**  
Phase III Agencies

Meeting Date	Arroyo	Bell	Bell Gardens	Belthorne	Cabrera	Canoga	Carson	Commer	Compton	Costa Mesa	Dana Point	Orange	Huntington Beach	Huntington Park	La Habra	La Habra
July 28, 1993		1	1	1	1	1	1			1	1			1	1	1
August 25, 1993	1	1	1	1	1	1	1	1	1	1	1	1				
September 22, 1993		1	1	1	1	1	1			1	1	1		1	1	
October 27, 1993		1	1	1	1	1	1			1	1	1		1	1	
<b>TOTAL</b>	<b>1</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>1</b>	<b>1</b>	<b>4</b>	<b>4</b>	<b>3</b>	<b>0</b>	<b>3</b>	<b>4</b>	<b>2</b>

Meeting Date	La Habra	La Habra	La Habra	La Habra	La Habra	La Habra	La Habra	La Habra	La Habra	La Habra	La Habra	La Habra	La Habra	La Habra	La Habra	La Habra	La Habra
July 28, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
August 25, 1993		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
September 22, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
October 27, 1993		1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
<b>TOTAL</b>	<b>2</b>	<b>4</b>	<b>4</b>	<b>1</b>	<b>3</b>	<b>4</b>	<b>3</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>3</b>	<b>3</b>	<b>4</b>

SEM A ATTN III WK 1

The following are agencies in Phase I or Phase II which are not likely to participate in Phase III but have not submitted a letter to the RWQCB indicating that all Phase III activities were covered under Phase I or Phase II

El Segundo (1)	La Habra Heights (11)	Redondo Beach (1)	Rolling Hills Estates (1)
Inglewood (1)	Rancho Palms Verdes (1)	Rolling Hills (1)	Torrance (1)

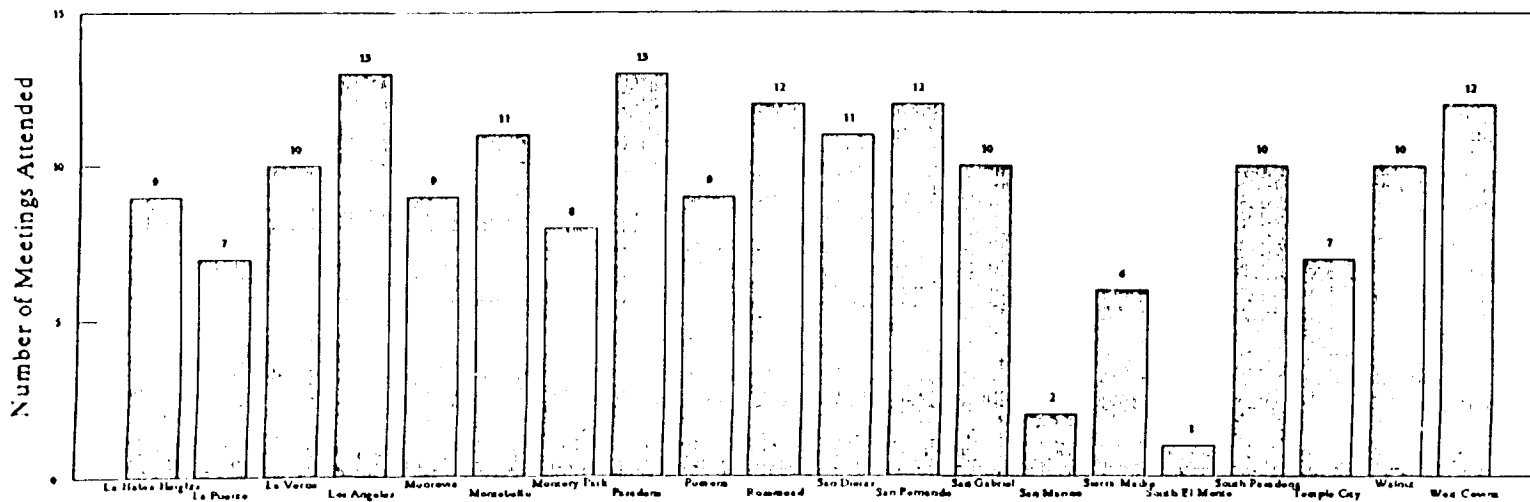
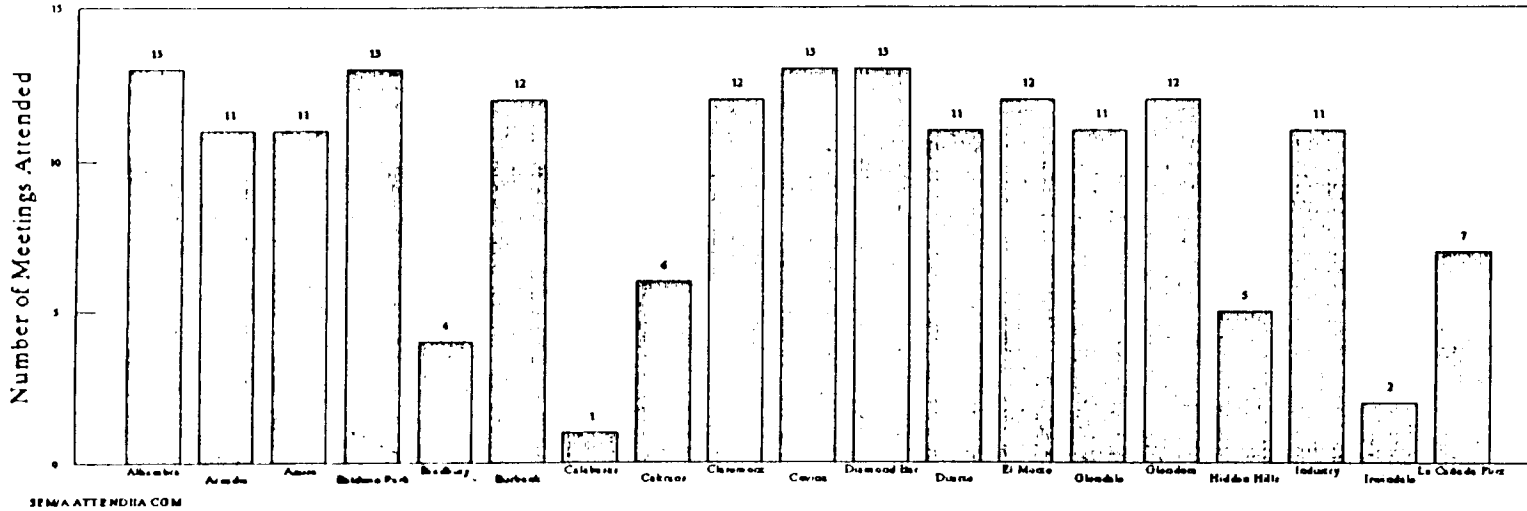
The following are agencies in Phase I or Phase II which will not participate in Phase III because they have submitted a letter to the RWQCB indicating that all Phase III activities were covered under Phase I or Phase II

Alhambra (11)	Montebello (11)	Pasadena (11)
Glendale (11)	Palms Verdes Estates (1)	South Pasadena (11)



Phase II Agencies  
**MONTHLY PERMITTEE MEETING ATTENDANCE**

Number of Meetings to Date: 13 (August 5, 1992 to October 6, 1993)



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**MONTHLY PERMITTEE MEETING ATTENDANCE**  
Phase II Cities

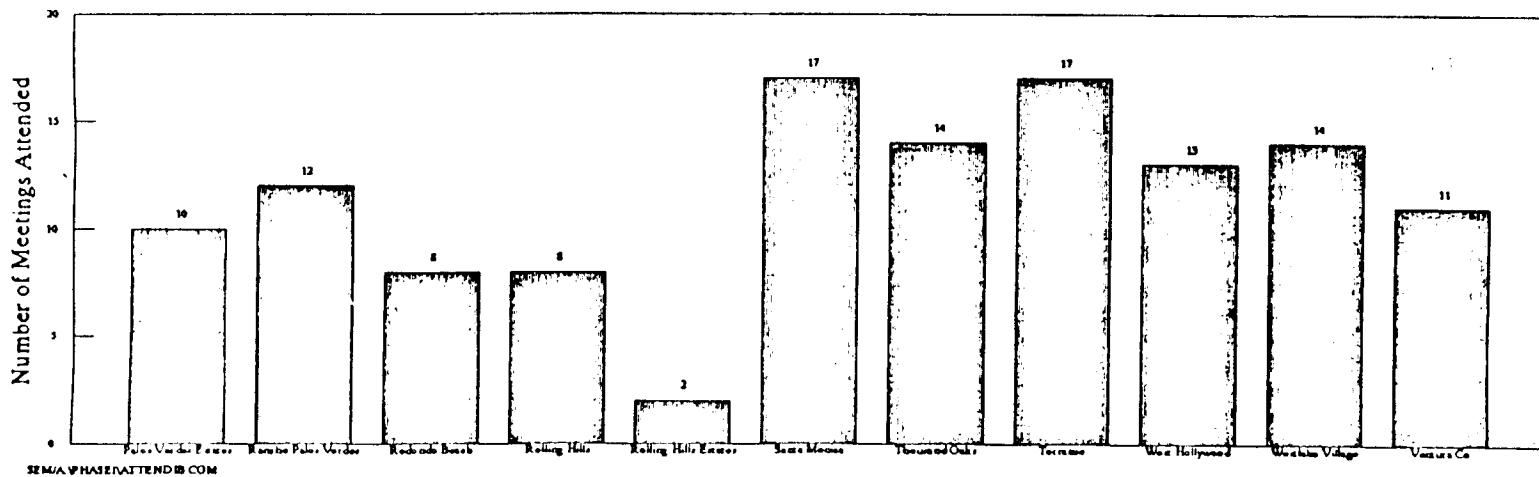
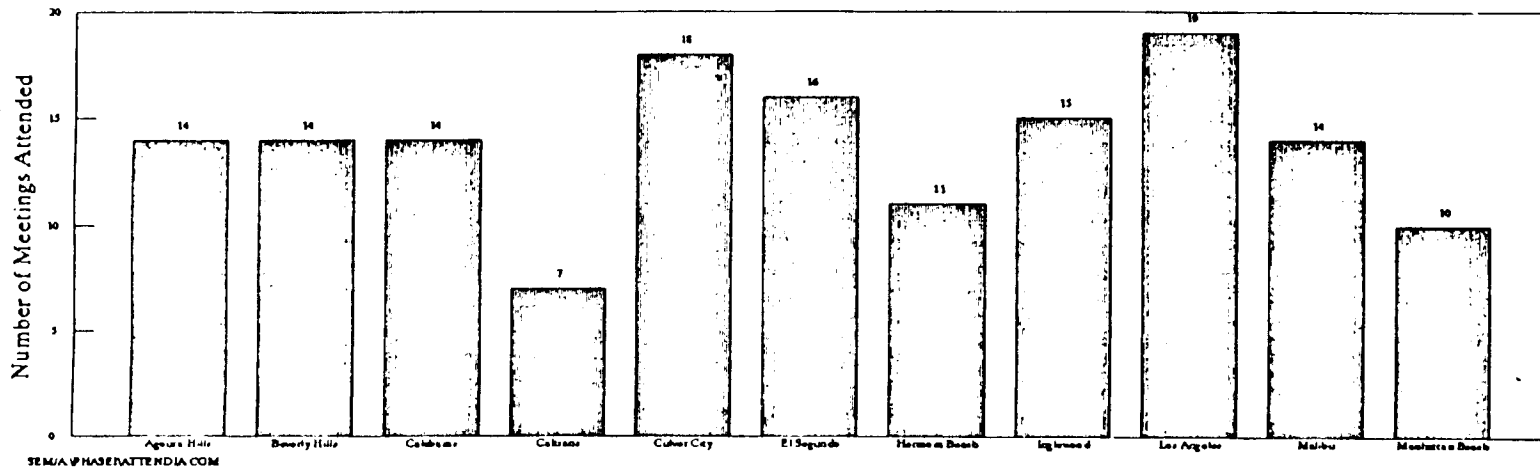
Meeting Date	Alhambra	Arroyo	Azusa	Baldwin Park	Brea	Burbank	Colton	Covina	Claremont	Covina	Diamond Bar	La Habra	El Monte	Glendale	Glendale	Industry	Rowland	San Gabriel	San Jose	
August 5, 1992	1																			
September 2, 1992	1																			
October 7, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
November 4, 1992	1																			
December 2, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
February 3, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
March 3, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
April 7, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
May 5, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
June 2, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
July 7, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
August 4, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
October 6, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
TOTAL:	13	11	11	11	4	12	1	6	12	13	13	11	12	11	12	5	11	2	7	7

Meeting Date	Alhambra	Arroyo	Azusa	Baldwin Park	Brea	Burbank	Colton	Covina	Claremont	Covina	Diamond Bar	La Habra	El Monte	Glendale	Glendale	Industry	Rowland	San Gabriel	San Jose	
August 5, 1992	1																			
September 2, 1992	1																			
October 7, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
November 4, 1992	1																			
December 2, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
February 3, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
March 3, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
April 7, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
May 5, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
June 2, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
July 7, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
August 4, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
October 6, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
TOTAL:	9	7	10	13	4	11	8	13	4	12	11	12	10	2	6	1	10	7	10	12



# Phase I Agencies MONTHLY PERMITTEE MEETING ATTENDANCE

Number of Meetings to Date: 19 (April 21, 1992 to October 19, 1993)



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**MONTHLY PERMITTEE MEETING ATTENDANCE**  
Phase I Cities

Meeting Date	Agoura Hills	Beverly Hills	Calabasas	Caltrans	Culver City	El Segundo	Hermosa Beach	Inglewood	Los Angeles	Malibu	Manhattan Beach
April 21, 1992					1	1	1	1	1		1
May 19, 1992	1		1	1	1	1	1	1	1	1	1
June 23, 1992	1	1	1	1	1	1	1	1	1	1	1
July 21, 1992	1			1	1	1	1	1	1		
August 18, 1992	1	1	1			1	1	1	1	1	
September 22, 1992			1		1			1	1		1
October 20, 1992	1		1		1	1		1	1	1	
November 17, 1992		1	1		1	1		1	1	1	
January 19, 1993	1	1	1		1	1	1	1	1	1	
February 2, 1993	1	1		1	1	1		1	1		
February 16, 1993		1	1		1	1		1	1	1	
March 16, 1993	1	1			1				1		1
April 20, 1993		1	1		1	1	1	1	1	1	1
May 18, 1993	1	1			1	1			1	1	1
June 15, 1993	1	1	1		1	1			1	1	1
July 20, 1993	1	1	1	1	1	1	1	1	1	1	1
August 17, 1993	1	1	1		1		1	1	1	1	
September 21, 1993	1	1	1	1	1	1	1	1	1	1	
October 19, 1993	1	1	1	1	1	1	1	1	1	1	1
TOTAL	14	14	14	7	18	16	11	15	19	14	10

Meeting Date	Palmdale	Verdes	Escondido	Rancho Palms	Vero Beach	Rolling Hills	Rolling Hills East	Santa Monica	Thousand Oaks	Torrance	West Hollywood	Westlake Village	Ventura Co
April 21, 1992	1			1		1		1	1	1	1		
May 19, 1992			1					1	1	1	1	1	1
June 23, 1992	1	1				1		1	1	1	1	1	
July 21, 1992	1	1	1					1	1	1	1		
August 18, 1992	1	1						1	1	1	1	1	
September 22, 1992								1	1	1	1	1	
October 20, 1992				1				1	1		1	1	
November 17, 1992				1				1		1	1	1	
January 19, 1993	1	1				1		1		1	1	1	1
February 2, 1993			1	1	1	1	1	1		1	1	1	
February 16, 1993	1	1	1	1	1			1	1	1	1	1	1
March 16, 1993	1	1	1							1			
April 20, 1993	1	1				1		1	1	1	1	1	1
May 18, 1993								1	1	1	1	1	1
June 15, 1993						1		1	1	1	1	1	1
July 20, 1993								1	1	1	1	1	1
August 17, 1993			1	1	1	1	1	1	1	1	1	1	1
September 21, 1993	1	1	1					1	1	1	1	1	1
October 19, 1993	1	1						1	1	1	1	1	1
TOTAL	10	12	8	8	8	2	17	14	17	13	14	11	11







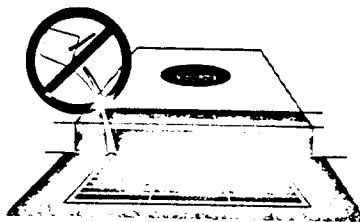




### Issue: Controls on Illegal Dumping

#### Messages:

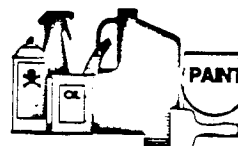
- Why label inlets and storm drains.
- How to detect and report illegal dumping.
- How to properly dispose of and recycle wastes.
- "Safe" alternative products.
- Do not litter.
- Adopt a street or a stream.
- Community cleanup days.
- Penalties associated with illegal dumping.



### Issue: Use of Hazardous Household Materials

#### Messages:

- Switch to safe alternative products.
- Use hazardous household materials properly.
- Impacts of improperly using hazardous household materials.



### Issue: Household Hazardous Waste Collection Programs

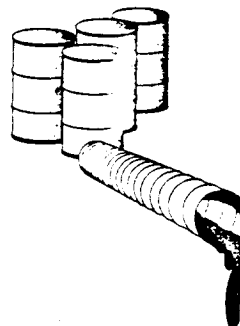
#### Messages:

- Location(s) and hours open.
- Materials accepted.
- Disposal and uses of materials collected.

### Issue: Illicit Connections

#### Messages:

- What an illicit connection is.
- Where to properly discharge non-stormwater wastes.
- Who to call if an illicit connection is discovered.
- How to properly install, repair and maintain a connection to the sanitary sewer or storm drain.
- Municipal requirements for making such connections.

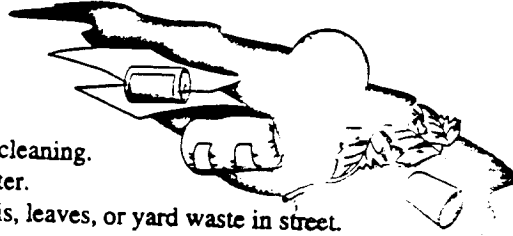


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**Issue: Street Cleaning**

**Messages:**

- Parking restrictions for street cleaning.
- Use litter receptacles/don't litter.
- Do not sweep or dispose debris, leaves, or yard waste in street.



**Issue: Stream and Channel Maintenance**

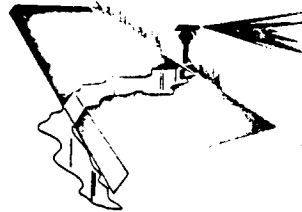
**Messages:**

- Adopt a stream/creek/beach.
- Do not dump into channels and streams.

**Issue: Water Conservation (in association with water utility)**

**Messages:**

- Do not over-irrigate or over-water.
- Use native vegetation to reduce irrigation.
- Divert runoff to landscaped areas.
- Capture runoff for nonpotable water use.



**Issue: Air Quality (in association with air quality management and transportation management agencies)**

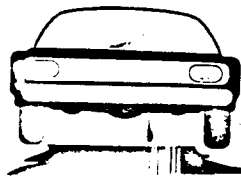
**Messages:**

- General message: Air pollution = water pollution.
- Use ride share programs.
- Use mass transportation.
- Participate in trip reduction programs.

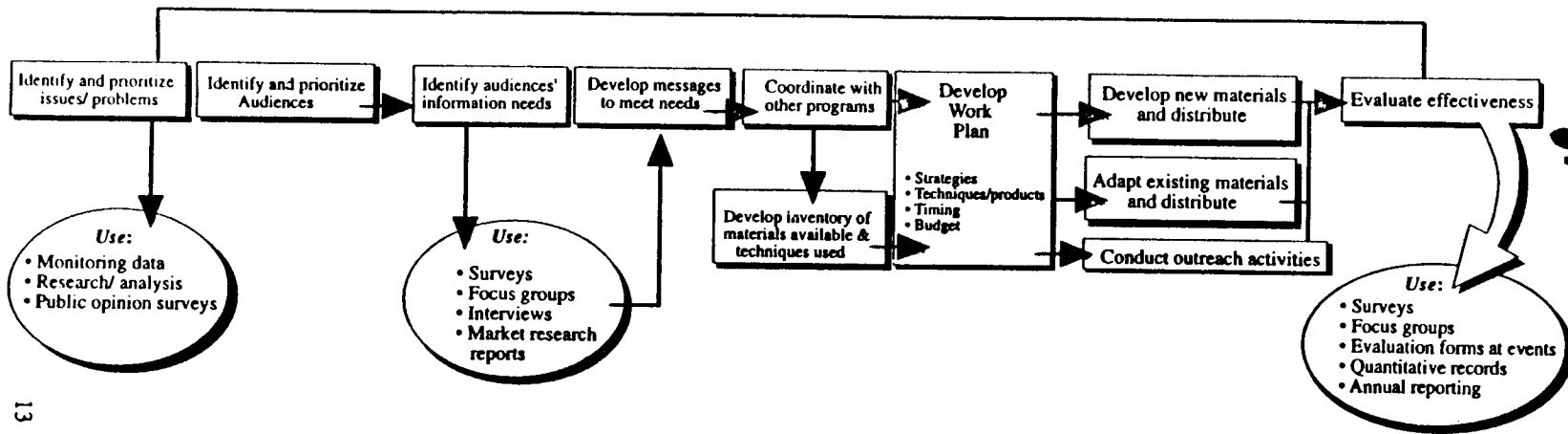
**Issue: Vehicle Leak and Spill Controls**

**Messages:**

- Inspect and maintain vehicles regularly.
- Maintain vehicles at home properly.
- Do not "top off" when fueling vehicle.



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## Appendix A

### Public Information and Public Participation Program Planning Process

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## APPENDIX B

### ISSUES AND MESSAGES

A PI/PP stormwater program can convey many messages, and you should select the most appropriate ones depending on your audiences and specific issues. This Appendix lists some of the issues which the PI/PP program may need to address and the types of messages which may be communicated for each issue. The two broad categories are:

#### I. Generic Issues

Generic issues relate to the nature of stormwater pollution, the ways it enters the environment and the overall structure of the stormwater management program. The messages relating to these generic issues may include:

- What a storm drain is and how it works.
- How pollutants get into storm drains.
- What the pollutants are.
- What the pollutants do (impacts).
- Where my taxes/fees/utility payments go.
- What an NPDES permit is.
- How watersheds work.
- What a BMP is.
- How it all affects "me."

#### II. Specific Issues

The PI/PP program must also address a number of specific issues on the methods available to the public to control stormwater pollution. The messages selected for the PI/PP program should "frame" the issue and identify what the public is being asked to do with regard to the issue. To help with this process, the following messages are categorized by the specific issues they address.

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- Keep a quantitative record of the number of brochures or other collateral materials distributed, the distribution mechanisms used, and the distribution channels used.
- Keep track of the number of presentations and workshops given.
- Record the number of task force meetings or other such coordination meetings held.
- Distribute sign-up sheets at all Stormwater Management Program events and workshops to monitor attendance and response to publicity; include participants on mailing list.
- Keep track of the number of volunteers participating in PI/PP program activities.

### Qualitative Effectiveness

Several techniques to measure qualitative effectiveness are:

- Conduct focus group meetings during the first year of PI/PP program implementation. Conduct follow-up focus group meetings to measure any increase in public understanding of stormwater pollution.
- Distribute comment forms at all Stormwater Management Program activities to measure the level of awareness of stormwater pollution among target audiences, assess the appropriateness of the material presented, and evaluate the degree of satisfaction of participants with the PI/PP program activity. Gather input received by participants and summarize comments so that suggestions for improvement may be incorporated into the PI/PP program as appropriate.
- Monitor coverage of stormwater pollution control messages and publicity in local media.
- Monitor changes in behaviors or practices of target audiences.

### **C. Annual Reporting**

Annually evaluate the overall direction and implementation strategy of the PI/PP program and make adjustments as needed. This evaluation should include a review of the quantitative records and effectiveness of the assessment data. Pay attention also to the messages disseminated (clarity, appropriateness, effectiveness), the audiences targeted, the outreach techniques used, and the effectiveness of the activities or products developed and distributed. This information will be valuable in refining the PI/PP program strategy as the program evolves.

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## V. CONCLUSION

The Public Information/Public Participation committee of the California Stormwater Quality Task Force hopes that this guide will help you plan a successful PI/PP program. By giving consideration to each of the key elements of the planning process, your efforts will increase public awareness about stormwater pollution, encourage changes in human behavior and ultimately improve water quality conditions in your community.

Remember that many communities either already have or are developing stormwater PI/PP programs in California and across the United States. Coordinating with them can ensure consistency and also be cost effective. A summary of other municipal stormwater management programs in California is included at the end of this Guide.

Working together, we can reduce stormwater pollution, improve water quality throughout California and minimize the need for costly "end-of-the-pipe" treatment.

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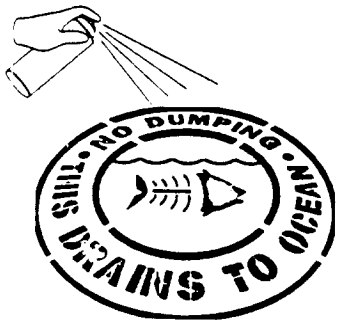
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#### D. Environmental Education or Community Outreach Programs

Nonprofit environmental groups and community organizations are extremely valuable resources for stormwater pollution prevention outreach. These organizations can be instrumental for promoting public awareness and participation by stenciling storm drains, adopting local creeks or storm drains for cleanup, conducting litter pickup, or providing volunteers for booths at community events and fairs. Examples of such programs and organizations include:



- Science or natural history museums
- Scouts
- Environmental interpretive centers
- Neighborhood associations
- Environmental and creek/gutter programs
- Homeowners' associations
- Public service groups
- 4-H clubs
- Creek preservation and cleanup organizations, such as Adopt-a- Beach, etc.
- Chambers of Commerce

#### IV. EVALUATION

Since most PI/PP programs are aimed at changing public behavior, it may be years before the effect of public education is significantly apparent in water quality data. Public education programs in water conservation or recycling have measurable benefits in terms of reduced water usage or refuse collection. There is no easily measurable parameter to demonstrate the effectiveness of public education about stormwater pollution. Nevertheless, a certain amount of monitoring and evaluation is necessary to measure the effectiveness of a PI/PP program. The primary purposes of monitoring and evaluation are to ensure that resources are being effectively spent and to modify program objectives, messages or techniques as necessary.

##### A. Evaluation Criteria

Some of the key questions to ask in an ongoing evaluation include:

- Has stormwater pollution declined in the areas where the PI/PP program has been implemented?
- Is the PI/PP program reaching the intended audiences with the intended messages?
- Are public information materials being distributed through the proper channels?
- Have targeted audiences been properly informed of the city/county/agency-wide Stormwater Management Program?



- What effect has the PI/PP program had upon the community's participation in the Stormwater Management Program?
- Are the program costs reasonable for the amount of public information provided?
- Where should future efforts be focused?

### B. Techniques for Measuring Effectiveness



Assessment of the effectiveness of PI/PP program activities, events, and materials should be incorporated into PI/PP program planning and implementation as an ongoing activity. Market research and other communications experts often use telephone surveys to measure the effectiveness of public information techniques. A well-designed survey qualitatively and quantitatively measures program effectiveness.

An initial survey provides baseline or "time" data to serve as the standard against which to compare future survey results. Over time, additional surveys track changes in awareness, attitudes, and behaviors regarding stormwater pollution and pollution reduction. Telephone surveys may also be used to modify or expand the target audiences and/or the public education programs.

Focus group meetings are another tool used by market research firms to analyze the effectiveness of outreach activities or materials. Focus groups consist of a cross-section of the public and may be used to assess the level of public recognition of the program identity (e.g., logo, slogan, mascot) and measure public recognition of program activities, products, events and publicity. In large organizations, focus groups can be established by using volunteers from within the organization.



Both telephone surveys and focus group discussions should be designed and conducted by knowledgeable professionals so that the results reflect accurate public perceptions and expectations. There are many market research firms available for consultation.

#### Quantitative Effectiveness

To assess level of effort and monitor program effectiveness, record the following types of information throughout program implementation:

- Include a stormwater information telephone number on all media products and monitor incoming calls to this number following release of the products. Find out how products were received.
- Track the number of calls received and types of concerns expressed to the telephone number.

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## F. Distribution Mechanisms

An outreach effort is not complete until your message is in the minds of the target audience. The goal is to capture the audience's attention and lodge your message long enough to create behavioral change. Make the message available in a way that assures it will be noticed. Make it interesting and worth reading or listening to. Often overlooked, it is important to develop a distribution plan so that the products can be effectively disseminated to the intended audience. One useful technique is to talk to members of the targeted audience about effective distribution mechanisms/channels *prior* to developing the outreach materials.

A few examples of distribution methods include:

- Direct mail
- Point of purchase
- Handouts
- Radio
- Television
- Municipal counters
- Workshops
- Outdoor boards
- Stenciling events

## III. COORDINATION

An effective PI/PP program should continually coordinate with environmental education or community outreach programs. Such coordination should occur at every stage of a PI/PP program, from planning to implementation. Given the many ongoing public information and community outreach programs in any community, building strategically on existing communication networks can minimize duplication and maximize the cost-effective penetration of the stormwater pollution control message.

The PI/PP program should coordinate with:

- Other elements of the Stormwater Management Program (i.e., illicit discharge elimination, construction and new development, and monitoring)
- Stormwater Management PI/PP programs in other communities
- Similar, ongoing public education efforts by other agencies or community groups related to water quality, solid waste management, wastewater management, pollution prevention, or environmental education
- Co-Permittee municipalities and agencies

### A. Within the Stormwater Management Program

Although the PI/PP program is often a separate entity within an overall Stormwater Management Program, it is useful to think of the PI/PP program as the vehicle by which any information developed in the other program components (e.g., construction and new development) may be



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### C. Target Audiences

Other important questions to ask when designing your outreach strategy are: Who are you talking to? What are your target populations? Are you trying to reach children, adults, business owners, construction workers, farmers, or elected officials? What is the ethnic make-up of your target audiences? What language(s) do they speak? What behaviors/practices that generate water pollution in your watershed do you want to change? Who is responsible for these behaviors/practices? Several techniques can help you get to know target audiences, including baseline surveys and focus group meetings. These techniques are described in more detail in Section IV, Evaluation.

A few examples of audiences you may want to target specifically include:

- Children
- Residents
- Business owners/employees
- Industry owners/employees
- Government employees
- Ethnic groups
- Church groups
- Civic/ Community groups
- Elected officials
- Program coordinators
- Media
- Volunteer organizations
- Environmental communities organizations
- Users of products containing priority pollutants
- Service clubs

### D. Key Messages

PI/PP programs may need to convey many different messages. In developing the messages, keep in mind these key considerations:

#### Relationship to Issues

The goal of the PI/PP program is to communicate appropriate messages about specific issues to a target audience. Thus, the messages must directly relate to program issues and should be consistent with overall requirements for stormwater pollution control. Appendix B lists possible messages as they relate to each of the generic and specific stormwater pollution control issues that may be addressed by the PI/PP program.

#### Relationship to Audience

To be effective, messages must be tailored to the particular needs and concerns of a specific audience. Know your audience, for different audiences relate to issues in different ways. Also, issues and messages may be "packaged" to suit the particular audience. For example, if a city council is considering proposing a fee to fund the stormwater program, the message will need to convey information about several issues: the nature of stormwater pollution, the regulatory mandate, pollutant sources requiring control and specific program needs and costs.

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### Nature of the Message

After you have defined important issues and target audiences, formulate your message: consider what you want to say and how you want to say it. It is important that the messages be considerate of and tailored to the specific lifestyles, concerns, informational needs and unique characteristics of each audience. For example, if your community is near a river frequently used for recreation, then the message may focus on the importance of preserving the water quality of the river so that it may continue to be enjoyed by the community.

Also, keep your message as simple and clear as possible while making certain that it is complete. Too little information can often be more harmful than no information at all. You also want to consider a mood. Do you want to project hopefulness, despair, a positive tone, a negative tone, seriousness, humor? Whatever the message or the mood, make sure your message is honest and valid so that you do not compromise the credibility of your program. Remember that the public is bombarded by slick, high-tech advertisements by national corporations. Since your message is competing for the public's limited attention span, the message must capture people's imagination so that they are interested in paying attention to your program.

### **E. Outreach Techniques**

Many techniques are available to spread the stormwater pollution control message, some of which are more effective than others. Again, by considering your issues, audience and message, you can determine the best vehicle to reach the targeted group. For example, some communities respond better to radio spots than to printed materials, while other audiences may respond better to workshops or informational presentations.

A few examples of outreach techniques are:

- Advertising (newspapers, radio, television, billboards, bus shelters)
- Events
- Presentations
- Workshops
- Community volunteer activities
- Utility inserts
- Newsletters
- Brochures
- Fact sheets
- Public relations activities
- Press kits
- Poster contests
- Videos
- Graphic displays or educational models
- Public service announcements
- Press conferences

## II. PROGRAM MANAGEMENT

One of the first steps in developing an effective PI/PP program is to establish some type of administrative or management structure. This step involves identifying the key player(s) who will be involved in the PI/PP program and defining their roles and responsibilities. The primary roles of these players are (1) to guide the overall development, implementation, and evaluation of the PI/PP program and (2) to establish and manage the program budget. Every effort should be made to include environmental organizations and other interested community members in the PI/PP program management structure.

Early in the PI/PP program it is also important to develop a program identity such as a logo, slogan and/or mascot. This identity will convey the spirit of the program, provide a unifying theme in the materials produced, and build public recognition of the program. A good example of a stormwater pollution prevention PI/PP program slogan is the one developed by the Alameda County Urban Runoff Clean Water Program: "Only Rain Down the Storm Drain!" This slogan appears on the program's printed materials and conveys the essential message of the program in a catchy, memorable way.

### A. Strategy and Task Development

Once the PI/PP program management structure is set up, the key player(s) in the PI/PP program can outline a strategy and develop tasks to implement the PI/PP program. As shown in Figure 1, strategy and task development are central to the PI/PP program planning process. Activities which are important in this planning stage include:

- Defining the goals and objectives of the program
- Developing a strategy to implement the goals and objectives
- Defining and prioritizing the issues that must be communicated to the public
- Defining and prioritizing specific target audiences
- Formulating appropriate messages to reach these audiences
- Developing, producing, and distributing program materials and activities

Although there is logic to the order in which the steps are conducted, the planning process is not a linear progression. Rather, it is ongoing and interactive, as shown in Figure 1. It is useful to consider each of the key elements of the planning process during development, implementation, and evaluation of PI/PP program tasks. In the following sections, these key elements are presented in detail.

**B. Issues**

While pollution reduction is the primary goal of a stormwater quality PI/PP program, a myriad of related issues must be considered for the program to be effective. First, there are generic issues, such as the nature of stormwater pollution, how it enters the environment, and the approach of the Stormwater Management Program to control it. The PI/PP program must also address a number of specific issues on the methods available to the public to control stormwater pollution. Your audience will determine what issues need to be the focus of any outreach effort. These are a few examples of issues involving urban runoff:

**REGULATORY MANDATE:** Does the PI/PP program meet the requirements of the NPDES permit?

**PROGRAM AWARENESS:** Do local decision makers and municipal personnel know about the Stormwater Management Program and how to reduce stormwater pollution?

**HUMAN HEALTH:** What are the implications to human health associated with stormwater pollution?

**WATERSHED AWARENESS:** How does the character of the watershed affect stormwater pollution?

**FUNDING MECHANISMS/BUDGET:** How is the Stormwater Management Program financed? Are there opportunities to obtain partial funding from corporations? How can costs be shared with other similar programs?

**STORM DRAIN MECHANICS:** How does the storm drain system work? Most people assume that stormwater is treated prior to discharge to creeks and waterways.

**ECOLOGICAL IMPACTS:** How does stormwater pollution affect local wildlife or habitat?

**SOURCES AND NATURE OF POLLUTION:** What are the sources of stormwater pollution and how is it transported to local waterways?

**PRIORITY POLLUTANTS:** What are pollutants of concern in your watershed and what types of products contain these pollutants?

Appendix B lists a number of other issues that a stormwater pollution PI/PP program may wish to address.

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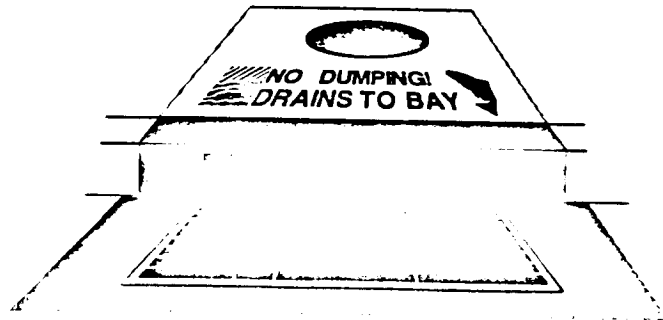
**I. INTRODUCTION**

This Program Development Guide provides a basic framework for planning a Public Information/ Public Participation (PI/PP) program and is intended to assist government agencies responding to federal stormwater NPDES permit requirements. This document is not a comprehensive "how-to" guide; rather, it provides general guidance about the process involved in planning a PI/PP program. The information presented here is based upon the experience gained by various stormwater management PI/PP programs throughout California.

As your agency embarks on this planning process, it is important to identify the specific characteristics, lifestyle issues, values, and informational needs of the community so that the materials produced and activities conducted fit the community. To plan effectively, your agency should define any particular political or financial constraints that may affect the development or implementation of a PI/PP program. In short, the effectiveness of your PI/PP program will depend on how well you know your community.

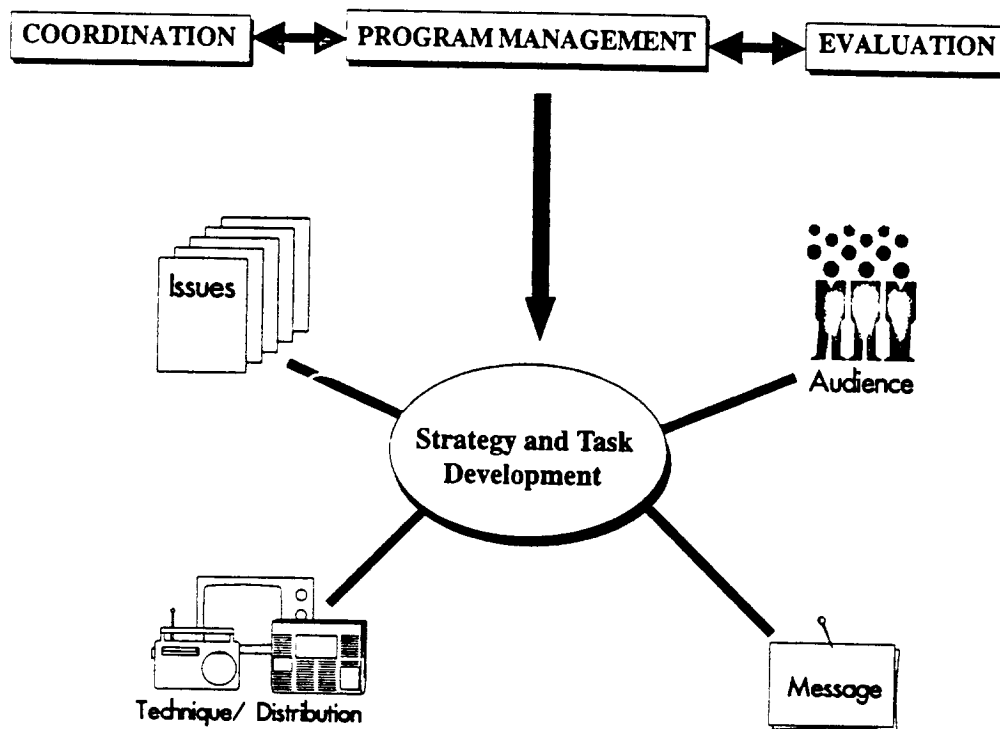
A frequently raised question pertaining to the development of a PI/PP program is, "How much will an effective program cost?" A variety of techniques can be used to educate the public, ranging widely in cost. However, perhaps the most cost-effective technique for planning a PI/PP program is to think carefully about how each of the items discussed in this document may apply to your particular community. Thoughtful and strategic planning can make even a small budget go a long way. Conversely, a tremendous amount of money can be uselessly spent if an agency does not really understand the needs and concerns of an audience and, equally important, how to communicate with that audience. Therefore, strategic planning and careful coordination are cost-effective, time-saving activities, and are important to developing a PI/PP program that works.

The following sections describe the basic elements involved in planning a PI/PP program. These elements are presented graphically on the next page. A flow diagram showing the step-by-step process of planning a PI/PP program is included as Appendix A.



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**Basic Elements of a PI/PP Program**

## FOREWARD

This document was prepared by the Public Information/Public Participation Committee of the APWA/SWRCB Stormwater Quality Task Force. Its purpose is to provide guidance to governmental agencies that are just beginning to develop public outreach programs in compliance with the new stormwater permit requirements in the Clean Water Act. The information is sufficient to give public agencies an understanding of the basic components of a public outreach program to manage stormwater quality.

On pages 18-20 is a list of agencies that have, or soon will establish public education programs. Networking with already established programs is highly recommended. It will save time and use resources most effectively.

Many thanks to the members of the committee that helped develop and shape this document. Special thanks go to Vice-Chair Sharon Gosselin, Karen Boyd, Chuck Ellis, John Aldrich and Jag Salgaonkar who did the majority of the work on the individual pieces.

Philip L. Richardson  
City of Los Angeles  
Chairman

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A PROGRAM DEVELOPMENT GUIDE FOR  
STORMWATER PUBLIC EDUCATION  
IN CALIFORNIA

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Prepared by the  
Public Information/ Public Participation Committee  
of the APWA/SWRCB Stormwater Quality Task Force

October 1993

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# BUSINESS AND THE ENVIRONMENT

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**STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES**

as of September 20, 1993

Due Date	Activities	Paramount	Pasadena	Pico Rivera	Rancho Palos Verdes	Redondo Beach	Rolling Hills	Rolling Hills Est.	Santa Clarita	Santa Fe Springs	Signal Hill	South Gate	South Pasadena	Torrance	Vernon	Whittier
	Letter of Intent	06/18/93	NA	06/24/93	NA	NA	NA	NA	06/14/93	08/19/93	06/21/93	06/24/93	NA	NA	06/08/93	06/21/93
Sep 30, 1993	Submission of Existing Rainfall Data	09/20/93	NA	09/07/93			NA				08/31/93	09/16/93	NA			09/08/93
	Submission of Existing Flow Data	09/20/93	NA	09/07/93			NA				08/31/93	09/15/93	NA			09/08/93
	Submission of Existing Water Quality Data	09/20/93	NA	09/07/93			NA				08/31/93	09/23/93	NA			09/08/93
	24 Hour Spill Response Telephone Number	09/07/93	NA				NA				08/31/93	09/23/93	NA			09/08/93
Feb 28, 1993	Alignment of Stormdrain		NA				NA						NA			
	Identification of Natural Drainage Watercourses		NA				NA						NA			
	Identification of Private Drainage Systems		NA				NA						NA			
	Definition of Drainage Boundaries		NA				NA						NA			
Nov 8, 1993	Determination of Existing BMPs for Construction Sites		NA				NA						NA			
	Existing BMPs for Illegal Discharge & Disposal Practices		NA				NA						NA			
	Existing BMPs for Residential, Commercial, & Industrial		NA				NA						NA			
	Identification of Waste Disposal Facilities	09/20/93	NA	09/07/93			NA						NA			
Mar 1, 1994	Identification of Industries by SIC Code		NA	09/07/93			NA				08/24/93	09/13/93	NA			
Mar 31, 1994	Development of Early Action BMP Plan		NA				NA				08/24/93	09/13/93	NA			
May 12, 1994	Required Authority for Regulation of Stormwater/Urban Runoff		NA	09/07/93			NA						NA			
	Stormwater Permit Implementation Agreement		NA	06/24/93			NA						NA			

Date Received  
 Date Determined Acceptable As To Form

NA = Not applicable or agency covered under other phase

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**STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES**

as of: September 20, 1993

Dead Lines	Activities	Ahambra	Artesia	Bell	Bell Gardens	Bell-Rower	Caltrans	Carson	Cerritos	Commerce	Compton	Cudahy	Downey	El Segundo	Gardens	Glendale	Hawaiian Gardens
	Letter of Intent	NA	09/16/93	06/24/93	06/23/93	06/21/93	NA	06/06/93	06/24/93	06/06/93	07/28/93	06/21/93	06/21/93	NA	06/05/93	NA	07/01/93
Sep 30 1993	Submittal of Existing Rainfall Data	NA		06/31/93		06/03/93		06/31/93				06/25/93	06/25/93			NA	
	Submittal of Existing Flow Data	NA		06/31/93		06/03/93		06/31/93				06/25/93	06/25/93			NA	
	Submittal of Existing Water Quality Data	NA		06/31/93		06/03/93		06/31/93				06/25/93	06/25/93			NA	
		NA		06/31/93		06/03/93		06/31/93				06/25/93	06/25/93			NA	
		NA		06/31/93		06/03/93		06/31/93				06/25/93	06/25/93			NA	
Oct 14 1993	24 Hour Spill Response Telephone Number	NA		09/07/93			06/30/93					09/16/93				NA	
Oct 28 1993	Alignment of Stormdrain	NA														NA	
	Identification of Natural Drainage Watercourses	NA														NA	
	Identification of Private Drainage Systems	NA														NA	
	Definition of Drainage Boundaries	NA														NA	
		NA														NA	
Nov 30 1993	Determination of Existing BMPs for Construction Sites	NA														NA	
	Existing BMPs for Illegal Discharge & Disposal Practices	NA														NA	
	Existing BMPs for Residential, Commercial, & Industrial	NA														NA	
		NA														NA	
		NA														NA	
Feb 1 1994	Identification of Waste Disposal Facilities	NA														NA	
Mar 1 1994	Identification of Industries by SIC Code	NA														NA	
		NA														NA	
Mar 31 1994	Development of Early Action BMP Plan	NA														NA	
		NA														NA	
May 12 1994	Required Authority for Regulation of Stormwater/Urban Runoff	NA														NA	
	Stormwater Permit Implementation Agreement	NA														NA	
		NA														NA	

ATTACHMENT F

Date Received  
 Date Determined Acceptable As To Form

NA - Not applicable or agency covered under other phase

R0033074

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**STATUS OF YEAR 1 ACTIVITIES FOR PHASE III AGENCIES**  
as of September 20, 1993

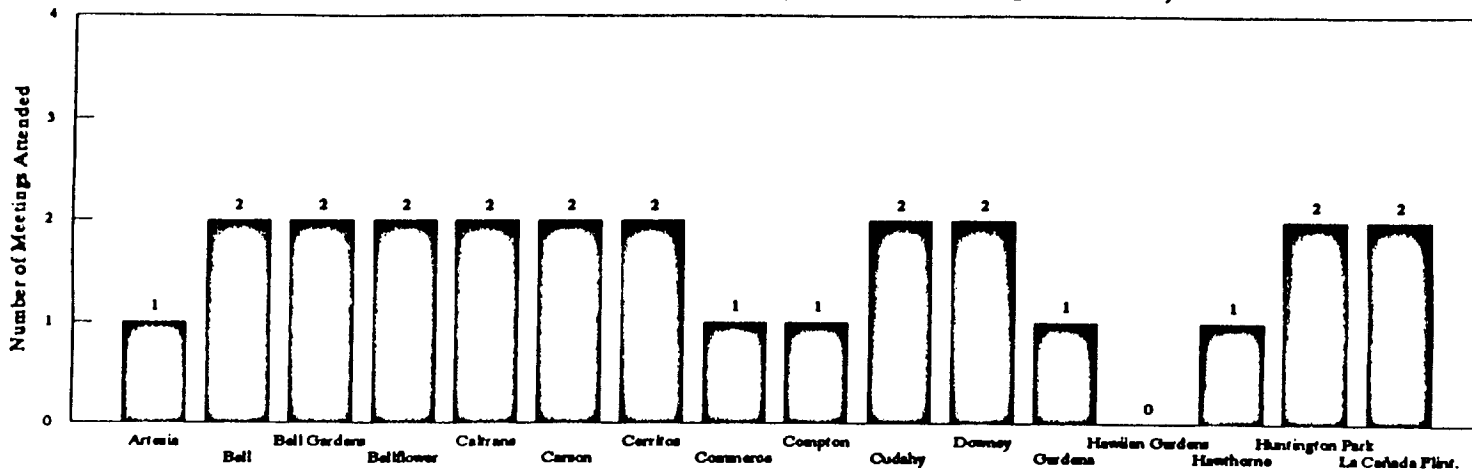
Dead- lines	Activities	Hewthorne	Huntington Park	Inglewood	La Cañada Flintridge	La Habra Heights	La Mirada	Lakewood	Lawndale	Lomita	Long Beach	Los Angeles	Lynwood	Maywood	Montebello	Norwalk	Palos Verdes Estates
	Letter of Intent	02/03/93	02/01/93	NA	04/22/93	NA	07/21/93	06/30/93	06/21/93	06/14/93	06/10/93	NA	06/21/93	06/30/93	NA	06/24/93	NA
p. 30 1993	Submission of Existing Rainfall Data	08/16/93 08/19/93	08/05/93 08/05/93	NA NA	08/05/93 08/25/93								09/08/93 08/08/93	08/25/93 08/25/93	NA NA	09/13/93 08/13/93	NA NA
	Submission of Existing Flow Data	08/16/93 08/16/93	08/05/93 08/05/93	NA NA	08/05/93 08/25/93								09/08/93 08/08/93	08/25/93 08/25/93	NA NA	09/13/93 08/13/93	NA NA
	Submission of Existing Water Quality Data	08/16/93 08/16/93	08/05/93 08/05/93	NA NA	08/05/93 08/05/93								09/08/93 08/08/93	08/25/93 08/25/93	NA NA	09/13/93 08/13/93	NA NA
	24-Hour Spill Response Telephone Number			NA NA										09/16/93 08/16/93	NA NA		NA NA
Oct. 28 1993	Alignment of Stormdrain			NA NA											NA NA		NA NA
	Identification of Natural Drainage Watercourses		08/05/93 08/05/93	NA NA											NA NA		NA NA
	Identification of Private Drainage Systems		08/05/93 08/05/93	NA NA											NA NA		NA NA
	Definition of Drainage Boundaries			NA NA											NA NA		NA NA
Nov. 30 1993	Determination of Existing BMPs for Construction Sites			NA NA											NA NA		NA NA
	Existing BMPs for Illegal Discharge & Disposal Practices			NA NA											NA NA		NA NA
	Existing BMPs for Residential, Commercial, & Industrial			NA NA											NA NA		NA NA
Feb. 1 1994	Identification of Waste Disposal Facilities			NA NA									09/08/93		NA NA		NA NA
Mar. 1 1994	Identification of Industries by SIC Code			NA NA									07/13/93		NA NA		NA NA
Mar. 31 1994	Development of Early Action BMP Plan			NA NA											NA NA		NA NA
May 12 1994	Required Authority for Regulation of Stormwater/Urban Runoff			NA NA											NA NA		NA NA
	Stormwater Permit Implementation Agreement			NA NA											NA NA		NA NA

☐ Date Received  
☐ Date Determined Acceptable As To Form

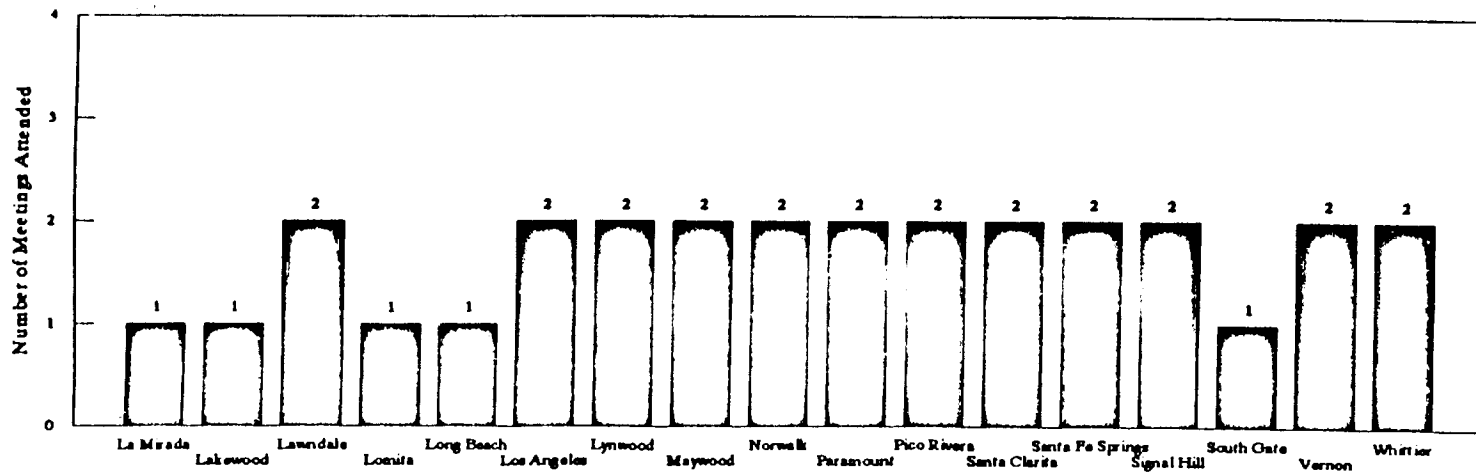
NA = Not applicable or agency covered under other phase

Phase III Agencies  
**MONTHLY PERMITTEE MEETING ATTENDANCE**

Number of Meetings to Date: 2 (July 28, 1993 to August 25, 1993)



SEM/A-ATTNDIHA.COM



ATTACHMENT G

R0033076

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# Memorandum

To : RPG, RAH, DD, MP, XS

Date: 16 Sept 1993

File :

CU

From : CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—LOS ANGELES REGION  
101 Centre Plaza Drive, Monterey Park, CA 91754-2154  
Telephone: (213) 266-7500

Subject : CALTRANS MEETING

Mark Pumford, Xavier Swamikannu, and myself, met with Wayne Ballantyne and Ralph Sasaki of Caltrans District 7, yesterday to discuss Caltrans' non compliance with NPDES Municipal Stormwater Discharge Permit No. CA0061654. Caltrans was eager to meet with us because later this week they meet with NRDC to discuss their potential suit.

Mr. Ballantyne told us that the day before, they had met with LA County to discuss what needed to be done (by Caltrans) county-wide. Caltrans said that they would install samplers on selected highways. (We would have the final say of where they go.) We will supply Caltrans a copy of the Santa Monica Bay Restoration Project's monitoring program which discusses highway monitoring. They will also work with Xavier and UCLA to determine the effectiveness of highway runoff filters. The new monitoring program will incorporate previous highway monitoring efforts conducted in the region.

Caltrans gave us copies of a stormwater management program that Caltrans District 4 (San Francisco Bay) had put together. Caltrans was looking for our approval of District 4's program so that it could be adapted to suit District 7's region. I will comment on their draft and then they'll finalize it and submit to us.

At the LA County Fair, Caltrans has a table where they have some public education materials. One of which is a stormwater pollution advisory flyer. They said that they will be working with the County and other permittees to develop public education materials.

I mentioned to Caltrans that we do not know how their construction sites are run nor do we know what occurs at their maintenance facilities. They will incorporate this information into their Stormwater Management Manual.

Finally, Caltrans said that they are actually doing work but have not spent any time documenting progress. They are now in communication with their headquarters who is finally realizing the gravity of the problems faced by Caltrans state-wide.

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BERMUR INDUSTRIES, INC  
529 CERES AV  
LOS ANGELES CA 90013

BOYLES SNYDER CO  
6610 LEXINGTON AV  
LOS ANGELES CA 90038

CAL-DORAN METALLURGICAL SERVIC  
2846 LUGO ST  
LOS ANGELES CA 90023

CALIF TECH PLATING CORP  
11533 BRADLEY AV  
PACOIMA CA 91340

CALIFORNIA PANTOGRAPH INC  
20803 DEARBORN ST  
CHATSWORTH CA 91311

CASA DE CHROME  
6868 FARMDALE AV  
NO HOLLYWOOD CA 91605

CERTIFIED ENAMELING INC  
3352 UNION PACIFIC AV  
LOS ANGELES CA 90023

CERTIFIED ENAMELING INC  
2342 EMERY ST  
LOS ANGELES CA 90023

CHATSWORTH PLATING CO.  
8865 CANOGA AV  
CANOGA PARK CA 91304

CIRCUIT MANUFACTURING  
9535 OWENSMOUTH AV  
CHATSWORTH CA 91311

CIRCUIT SERVICES/PROTOTECH MCC  
18634 PARTHENIA ST  
NORTHRIDGE CA 91324

DECORATIVE METAL FINISHING  
12990 BRANFORD ST  
PACOIMA CA 91331

DELTA CIRCUITS, INC.  
16028 ARMINTA ST  
VAN NUYS CA 91406

DIP BRAZE INC  
9131 DE GARMO AV  
SUN VALLEY CA 91352

DOLPHIN ENGINEERING  
1842 41ST PL  
LOS ANGELES CA 90058

E/M LUBRICANTS  
6940 FARMDALE AV  
NO HOLLYWOOD CA 91605

ELECTROMATIC  
3349 UNION PACIFIC AV  
LOS ANGELES CA 90023

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L N L ANODIZING  
9900 GLENOAKS BL  
SUN VALLEY CA 91352

LANCE INDUSTRIES  
13001 BRADLEY AV  
SYLMAR CA 91342

M & R PLATING CORPORATION  
10939 MAGNOLIA BL  
NO. HOLLYWOOD CA 91601

MALCO A MICRODOT CO  
220 PASADENA AV  
SO PASADENA CA 91036

MATCHMASTER DYEING & FINISHING  
3700 BROADWAY PL  
LOS ANGELES CA 90007

MICRO MATIC USA INC  
19791 BAHAMA ST  
NORTHRIDGE CA 91324

NELSON NAMEPLATE CO  
3179 CASITAS AV  
LOS ANGELES CA 90039

NETWORKS ELECTRONICS CORP  
9750 DE SOTO AV  
CHATSWORTH CA 91311

NEWPORT LABORATORIES, INC.  
21642 MARILLA ST  
CHATSWORTH CA 91311

ORCHIDS & ROSES, INC  
3499 15TH ST  
LOS ANGELES CA 90023

PACIFIC BONDE CO  
11246 ILEX AV  
PACOIMA CA 91331

PACIFIC PLATING  
3400 UNION PACIFIC AV  
LOS ANGELES CA 90023

PANKAJ INTERNATIONAL INC.  
3040 ROSSLYN ST  
LOS ANGELES CA 90065

PHOTO CHEM ETCH CORP  
7714 SAN FERNANDO RD  
SUN VALLEY CA 91352

PHYLTRICH INTERNATIONAL  
1000 ORANGE DR.  
N HOLLYWOOD CA 90038

PROTOTECH CIRCUITRY, INC.  
9615 COZYCROFT AV  
CHATSWORTH CA 91311

R & E PLATING CO  
3500 UNION PACIFIC AV  
LOS ANGELES CA 90023

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RACAAR CIRCUIT INDUSTRIES, INC.  
9225 ALABAMA AV  
CHATSWORTH CA 91311

RAPID PLATING INC  
1216 SLAUSON AV  
LOS ANGELES CA 90044

ROCKET INDUSTRIES INC.  
3521 UNION PACIFIC AV  
LOS ANGELES CA 90023

ROYALE SILVER CO. / N. BALLON  
7930 3RD ST.  
LOS ANGELES CA 90048

RRR GLASSWERKS INC.  
3008 SAN PEDRO ST  
LOS ANGELES CA 90011

SAL'S PLATING CO.  
3419 UNION PACIFIC AV  
LOS ANGELES CA 90023

SEMI CIRCUITS CO  
18718 BRYANT ST  
NORTHRIDGE CA 91324

SOLDER WORLD  
9555 OWENSMOUTH AV  
CHATSWORTH CA 91311

SOMERS & ELMORE  
10717 CHANDLER BL  
NO. HOLLYWOOD CA 91601

SPACE AGE PLTNG DBAPLATERONICS  
9164 INDEPENDENCE AV  
CHATSWORTH CA 91311

STANDARD NICKEL-CHROMIUM PLATI  
826 62ND ST  
LOS ANGELES CA 90001

STARLITE ORIGINALS, INC  
1601 INDIANA ST  
LOS ANGELES CA 90063

SYNCOM ENGINEERING INC.  
15749 STAGG ST  
VAN NUYS CA 91406

TAVCO INC  
20500 PRAIRIE ST  
CHATSWORTH CA 91311

TEC-PROCESSING CO.  
11263 ILEX AV  
PACOIMA CA 91331

TELEDYNE MICROELECTRONICS  
12930 PANAMA ST  
LOS ANGELES CA 90066

THE BUMPER SHOP, INC.  
808 FLORENCE AV  
LOS ANGELES CA 90001

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TOP COAT METAL FINISHING  
528 E ST  
WILMINGTON CA 90744

TSM COMPANY  
3422 PICO BL  
LOS ANGELES CA 90019

ULTRAMET  
12173 MONTAQUE ST  
PACOIMA CA 91331

VALLEY PLATING WORKS INC  
2701 SAN FERNANDO RD  
LOS ANGELES CA 90065

VAN NUYS PLATING INC  
6109 VESPER AV  
VAN NUYS CA 91401

VIKING ELECTRONICS, INC  
15521 LANARK ST  
VAN NUYS CA 91406

W.A. BENJAMIN ELECTRIC CO.  
1615 STAUNTON AV  
LOS ANGELES CA 90021

WINCHESTER ELECTRONICS/USECO  
13536 SATICOY ST  
VAN NUYS CA 91402

WONTRONICS INC  
3048 COOLIDGE AV  
LOS ANGELES CA 90039

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THOMAS A. TIDEMANSON, Director

COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

800 SOUTH FREMONT AVENUE ALHAMBRA, CALIFORNIA 91803-1331 Telephone: (818) 438-5100

GARY

ADDRESS ALL CORRESPONDENCE TO P.O. BOX 1460 ALHAMBRA, CALIFORNIA 91802-1460

August 16, 1993

Dr. Robert P. Ghirelli Executive Officer California Regional Water Quality Control Board, Los Angeles Region 101 Centre Plaza Drive Monterey Park, CA 91754-2156

Dear Dr. Ghirelli:

MUNICIPAL STORMWATER PERMIT CONFIRMATION OF DISCUSSION ON SECOND YEAR COMPLIANCE REVIEW

On August 4, 1993, a meeting was held among yourself, Mark Yumford, Xavier Swamikannu, and Carlos Urrunaga of your staff with Jim Noyes, Rod Kubomoto, and Gary Hildebrand of this Department. The meeting was held to discuss your recommendations, in the June 17, 1993 letter, resulting from your review of the Permittees second-year compliance. This letter is to confirm our discussion.

Baseline Best Management Practices (BMPs)

You recommended 13 Baseline BMPs for implementation by all Permittees. We foresee no difficulty in complying with Nos. 1, 2, 4 through 8, and 10 through 13.

BMP No. 3 recommends the adoption of a Runoff Control Ordinance. The City of Santa Monica's Model Ordinance has been mentioned as an example for other Permittees to follow. We are conducting a detailed review of our existing codes and ordinances in comparison with the provisions of the Santa Monica Ordinance. This review should be completed by the end of this month. Upon completion of our review, we will decide whether a new "stormwater" ordinance is needed or whether modifications to existing codes and ordinances will suffice.

BMP No. 9 recommends the inspection of auto repair and parts facilities, gasoline stations, and restaurants. Through our existing Industrial Waste Program some of these facilities are currently being inspected. We are investigating what modifications could be made to this program to handle inspecting all of these facilities. Currently, this program is financially self-supportive through the collection of annual fees from industrial waste permit holders. Expansion of the program to cover the inspection of non-permitted businesses will require the establishment of an additional funding source.

Post-It brand fax transmittal memo 7671 # of pages 7 To Mark Yumford From Jorge Lopez Co. Reg 4 Co. CCC Dept. Phone # Fax #

VOL 11 00003319



Dr. Robert P. Ghirelli  
August 16, 1993  
Page 3

Nine fixed-station monitoring sites are proposed for the Santa Monica Bay Drainage Basin (SMBDB). The locations of these sites have been chosen to be representative of the various watersheds and land uses within the SMBDB.

In addition to providing data necessary for calculation of the event-mean concentrations, long-term data from these sites can be evaluated for any trends.

e. Develop monitoring for identification of sources of pollutants.

Of the nine proposed monitoring sites, five are located on single land-use watersheds. These sites will be used to characterize pollutants discharged from various land uses.

We are working with Caltrans to locate a section of freeway where runoff from the road surface would be isolated from surrounding land uses and is collected by a storm drain that meets the physical requirements for location of a sampling station. Establishment of this station is estimated to occur around Fall of 1994 prior to the 1994-95 rainy season.

f. Develop and implement a monitoring program to evaluate effectiveness of BMPs.

The 13 Baseline BMPs, proposed by your staff for the SMBDB, are all non-structural BMPs. Gauging the effectiveness of these BMPs will largely be done by non-traditional monitoring methods in lieu of actual water quality sampling. For example, effectiveness of street sweeping could be quantified by the type and amount of debris collected; public education by conducting surveys to measure increase in public awareness; and recycling programs by the amounts of material collected. Any future Proposed BMPs that are structural would be assessed using water quality sampling.

In addition, various Permittees may be proposing pilot or demonstration structural BMPs that would utilize water quality sampling to monitor effectiveness.

g. Develop and implement a monitoring program to identify locations of illegal practices and eliminate sources of pollutants.

We are in the process of developing a storm drain inspection program which will include the physical inspection of all County-owned storm drains. We estimate development to be completed by January 1994. Implementation will begin thereafter as weather permits with full implementation to begin by May 1994 after

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Dr. Robert P. Ghirelli  
August 16, 1993  
Page 4

conclusion of the rainy season. The program will identify non-stormwater discharges to storm drains for either removal from the system or acquisition of appropriate NPDES or other permits to continue. Field screening to characterize discharges will be part of this program.

Each Co-Permittee will be responsible for performing this activity in its own storm drain system. This is not part of the monitoring program to be developed by the Los Angeles County Department of Public Works on behalf of all Co-Permittees.

h. Develop and implement a program to evaluate stormwater impacts on selected receiving waters.

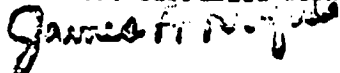
Though we are not opposed to participating in such a program, additional meetings will be needed with your staff to discuss the specifics, including its incorporation as part of the Regional Monitoring Program being developed by the SMERP for the SMB.

Enclosed for your approval is the revised stormwater/urban runoff monitoring program proposed for the SMBDB. The revised program addresses tasks a through e. Tasks f, g, and h will be addressed in the future in accordance with the timelines proposed for these tasks.

If you have any questions, please contact Gary Hildebrand at (818) 458-5948, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

T. A. TIDEMANSON  
Director of Public Works



JAMES A. NOYES  
Deputy Director

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MSP.SYC

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ENCLOSURE



FROM: LA CO DPW LOP

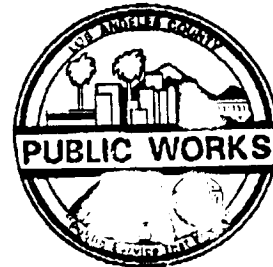
TO: CRWQCB - LA REGION

JUL 29, 1993 1:40PM #912 P.01

CK

LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS

FAX COVER SHEET



July 29, 1993

TO: Carlos Urrunaga  
California Regional Water Quality Control Board

FROM: Frank Kuo *FK*  
Waste Management Division  
(818) 458-6989

FAX (818) 458-4992

NUMBER OF PAGES (including this sheet): 3

REMARKS: Attached is the 24-hour hotline letter for your information. Please do not release the 24-hour hotline number until the program is fully developed.

Thank you.

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FROM: LA CO DPW LDP

TO: CRWQCB - LA REGION

JUL 29, 1993 1:41PM #912 P.02



**BOARD OF SUPERVISORS  
COUNTY OF LOS ANGELES**  
621 KENNETH HAHN HALL OF ADMINISTRATION / LOS ANGELES, CALIFORNIA 90012

MEMBERS OF THE BOARD  
GLODIA MOJICA  
TYONNE BRATHWAITE BUCKRE  
EDMUND D. EDELMAN  
DEANE DANA  
MICHAEL D. ANTONOVICH

EDMUND D. EDELMAN  
CHAIRMAN OF THE BOARD  
(213) 874-3033

July 28, 1993

Dear Mayor Ciraulo:

**24-HOUR HOTLINE FOR ILLEGAL DISCHARGES  
AND DUMPING INTO STORM DRAINS**

As you are aware, everything dumped into storm drains and open storm channels eventually ends up in the ocean. Accordingly, Los Angeles County, through the Department of Public Works (DPW), has created a 24-hour Storm Drain Hotline number (800-303-0003) to allow citizens to report suspected illegal discharges and dumping into storm drain systems, including street gutters and natural water courses. Our Hotline operators will obtain available information and contact the local law enforcement agency to request a response to the scene for investigation and enforcement. Other referrals will be made to the appropriate city or DPW maintenance personnel responsible for containment and cleanup activities.

The Hotline is an outgrowth of the County's role in implementing mandates associated with the National Pollutant Discharge Elimination System Permit for Stormwater/Urban Runoff Discharges issued by the California Regional Water Quality Control Board, Los Angeles Region. The Permit requires the County, cities, and other agencies to develop water quality management programs which include the detection and elimination of illegal discharges and dumping. We encourage your support for this important tool for such activities.

The Environmental Crimes/OSHA Division of the Los Angeles County District Attorney's Office will be contacting your law enforcement agency to coordinate their support and assistance.

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THOMAS A. TIDEMANSON, Director

# COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

July 28, 1993

IN REPLY PLEASE REFER TO FILE **WM-3**

Dr. Robert Ghirelli  
Executive Officer  
California Regional Water  
Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Dr. Ghirelli:

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT  
NO. CA0061654 (PERMIT)**

Our NPDES Permit requires us to identify legal and illegal dischargers to the storm drain system. In order to comply with the Permit, we request the following information:

1. A copy of all NPDES Permits issued for storm drain system discharges in the Upper Los Angeles and Upper San Gabriel River Drainage Basins. Discharge permits should be separated by drainage basin. Also indicate the storm drain receiving the permitted discharge.
2. The most recent monitoring data associated with each permit.

Please provide the information by October 30, 1993.

If you have any questions, please contact Mazen Dudar at (818) 458-3537, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

T. A. TIDEMANSON  
Director of Public Works

ROD KUBOMOTO  
Water Quality Section  
Waste Management Division

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600



**AGENDA**

STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

366th Regular Meeting  
Monday, July 19, 1993 - 9:30 A.M.

CITY COUNCIL CHAMBERS  
613 E. BROADWAY  
GLENDALE, CALIFORNIA

INTRODUCTION

1. Roll Call.
2. Approval of Minutes of the Regular Meeting held on June 14, 1993.

UNCONTESTED ITEMS

3. Uncontested Items Calendar. *(Items marked with an asterisk are expected to be routine and noncontroversial. The Board will be asked to approve these items at one time without discussion. If any interested party, Board Member, or staff person requests that an item be removed from the calendar, it will be taken up in the regular agenda order.)*

PUBLIC FORUM

4. Public Forum. *(Any member of the public may address the Board regarding any matter within the Board's jurisdiction. This need not be related to any item on the agenda.)*
5. Board Member Communications. *(The Board Members may discuss communications, correspondence, or other items of general interest relating to matters within the Board's jurisdiction. There will be no voting or formal action taken.)*

WASTE DISCHARGE REQUIREMENTS

6. Consideration of NPDES Requirements - New and Renewal. *(The Board will be asked, during a public hearing, to adopt the proposed permits for the following facilities.)*

NEW

- |      |   |           |
|------|---|-----------|
| *6.1 | Gardenia Foods Company, South Gate {R. Jesena}                  | CA0063126 |
| *6.2 | Wilmington Liquid Bulk Terminals, Inc., Wilmington {S. Birosik} | CA0063177 |

RENEWAL

- |      |  |           |
|------|--|-----------|
| *6.3 | Four Corners Pipe Line, Company, Newhall {H. Nguyen}                               | CA0059897 |
| *6.4 | Keysor-Century Corporation, Saugus {H. Nguyen}                                     | CA0057126 |
| *6.5 | Los Angeles County Metropolitan Transportation Authority, Los Angeles {G. Schultz} | CA0059714 |

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Agenda  
July 19, 1993

At any time during the regular session, the Board may adjourn to a closed session to consider litigation, personnel matters, or to deliberate on a decision to be reached based upon evidence introduced in a hearing. Discussion of litigation is within the attorney-client privilege and may be held in closed session. Authority: Government Code Section 11126(a)(d)(q).

ADJOURNMENT

13. Adjournment to Regular Meeting of August 23, 1993, at 9:30 a.m., City Council Chambers, City of San Buenaventura, 501 Poli Street, Ventura.

...

*A copy of the Agenda is available for examination by the public at the office of the Board during regular working hours. Please call the Executive Office at (213) 266-7514 for general information about the Agenda. Questions about specific items on the Agenda should be directed to the staff person whose name is listed with the item.*

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*Material presented to the Board as part of testimony that is to be made part of the record must be left with the Board. This includes photographs, slides, charts, diagrams, etc.*

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*All Board files pertaining to the items on this Agenda are hereby made a part of the record submitted to the Regional Board by staff for its consideration prior to action on the related items.*

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**  
**LOS ANGELES REGION**  
**Glendale, California**  
**July 19, 1993**  
**366th Regular Meeting**

**ITEM:** 9

**SUBJECT:** STORMWATER PERMIT FOR THE LOS ANGELES COUNTY -  
SECOND YEAR COMPLIANCE INFORMATION ITEM

**DISCUSSION:** On June 18, 1990, the California Regional Water Quality Control Board (Regional Board) adopted waste discharge requirements for municipal stormwater and urban runoff discharges in Los Angeles County with the Los Angeles County Department of Public Works (County) as the principal permittee. The County of Los Angeles is divided into five drainage basins that are phased into the municipal stormwater program starting with the Santa Monica Bay Drainage Basin on July 1, 1990. There are 22 co-permittees in this phase 19 cities, the County of Los Angeles, Caltrans, and unincorporated areas of Ventura County. In July 1992, the Upper Los Angeles and San Gabriel River Drainage Basins, involving 36 cities, were phased into the Program. On July 1, 1993, the Lower Los Angeles and San Gabriel River Drainage Basins, involving 30 cities, were phased into the program.

During the second year of the permit (July 1, 1991 to June 30, 1992), the Santa Monica Bay Drainage Basin permittees were required to complete six tasks. These tasks included: prepare an urban runoff monitoring program; develop additional BMPs to control pollutants from construction, residential, commercial, and industrial sites; develop procedures to detect and eliminate illegal discharges; submit evidence of Early Action BMP implementation; and submit evidence of adequate legal authority to regulate illegal discharges to drainage facilities and to prosecute violators.

Board staff have reviewed the submittals and the comments received from the Principal and Co-permittees, other agencies, and environmental groups. The attached reports detail staff's evaluation of the permittees' performance during the second year of the program. The report also contains recommendations for the permittees to bring the program up to speed.

**RECOMMENDATION:** Information Item. No action required.

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STAFF REPORT ON THE  
MUNICIPAL STORM WATER PERMIT FOR LOS ANGELES COUNTY

REVIEW OF SECOND YEAR COMPLIANCE  
(July 1, 1991 - June 30, 1992)

I. BACKGROUND

On June 18, 1990, this Regional Board adopted Order No. 90-079 (NPDES No. CA0061654) regulating storm water and urban runoff discharges from separate storm water sewers throughout Los Angeles County.

The area-wide municipal storm water permit was issued specifically recognizing that the storm drainage system in Los Angeles County is interconnected across numerous municipal jurisdictions. A workable and cost-effective storm water management program may be achieved only if Best Management Practices (BMPs) are used effectively to address, minimize, and/or prevent the pollution of storm water runoff on an area wide basis. Consequently, adoption and implementation of widely applicable pollution prevention practices as the initial step would be the most practical and efficient approach to ensure program effectiveness.

The Regional Board requires that permittees within their jurisdictions implement storm water management practices that are an integral part of a comprehensive area-wide storm water program. This may be achieved by incorporating a set of the same BMPs in all municipalities and a supplemental series of BMPs specific to the characteristics of a geographic location or hydrologic area. Other factors for consideration in effective BMP program development include:

1. Cross-Jurisdictional Agreements - A program for detecting and eliminating illegal connections, discharges, and disposal is essential for the overall success of the storm water program. The closures of Los Angeles County beaches due to high bacteria counts coming from the storm drainage system exemplify the fact that contaminants, litter, or other materials found in one municipality may originate from another area or municipality leading to cross-jurisdictional impacts. In order to effectively respond to such occurrences, a formal agreement should be developed by permittees similar to one being developed by the Ballona Creek Task Force chaired by the Los Angeles County Department of Public Works.

2. Construction Sites - The control of pollutants in surface runoff from construction sites is essential in preventing the flow of sediments and other waste materials and/or contaminants to the drainage system.

Municipal permittees are encouraged to adopt ordinances like those of the cities of Santa Monica and Malibu and develop enforcement strategies. These may include inspections at construction sites to insure that all practices are done in a proper and legal manner, and that problems are rectified immediately.

The State Water Resources Control Board (State Board) adopted a General Construction Storm Water Permit on August 20, 1992, which requires that a Storm Water Pollution Prevention Plan (SWPPP) be retained on site and will be made available to Regional Board or local authority representatives when requested. The SWPPP establishes procedures adopted by the site operator to prevent the pollution of storm water leaving the site, and is an important document to verify proper practices.

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3. Industrial Sites - Municipal permittees are to develop a storm water enforcement program which at a minimum shall include the inspection of industrial and commercial sites for compliance with municipal storm water pollution prevention programs. Such a program may utilize the Storm Water Pollution Prevention Plan (SWPPP) to verify compliance at facilities subject to the State of California General Industrial Storm Water Permit, and for notification of Regional Board staff for follow-up action.

4. Model Proposals - The City of Los Angeles and the City of Torrance have proposed and implemented noteworthy storm water programs and policies which may be effective in the prevention of runoff pollution. Regional Board staff suggests that all permittees consider such programs for potential implementation.

At the January 27, 1992, and January 25, 1993, Board meetings, staff presented reviews of compliance with first and second year requirements of the municipal storm water permit, respectively. At that time, not all requirements for Year 1 had been completed and some were carried over to Year 2.

During the first year of the Permit (July 1, 1990 - June 30, 1991), the cities and entities within the Santa Monica Bay Drainage Basin were phased into the Storm Water Program - 19 cities, the County of Los Angeles, Caltrans, and unincorporated areas of Ventura County.

The City of Thousand Oaks, which has a portion draining to the Santa Monica Bay Drainage Basin, submitted Part 1 and Part 2 application for a separate Municipal Storm Water Discharge Permit for that portion on March 25, 1992 and March 25, 1993, respectively. The City of Thousand Oaks is cooperating with the County of Los Angeles to ensure that all necessary information, data compilation, BMP compilation, and other relevant information is completed in a timely manner.

On July 1, 1992, 36 entities from the Upper Los Angeles River and the Upper San Gabriel River Drainage Basins became permittees under Phase II of the storm water permit. These cities in the Upper Los Angeles River Basin are: Burbank, Glendale, Hidden Hills, and San Fernando. Cities in the Upper San Gabriel River Drainage Basin are: Alhambra, Arcadia, Azusa, Baldwin Park, Bradbury, Claremont, Covina, Diamond Bar, Duarte, El Monte, Glendora, Industry, Irwindale, La Cañada Flintridge, La Habra Heights, La Puente, La Verne, Monrovia, Montebello, Monterey Park, Pasadena, San Dimas, San Gabriel, San Marino, Sierra Madre, South El Monte, South Pasadena, Temple City, Walnut, and West Covina.

On July 1, 1993, 30 entities from the Lower Los Angeles River and the Lower San Gabriel River Drainage Basins will become permittees under Phase III of the storm water permit. These entities include: Artesia, Bell, Bellflower, Bell Gardens, Carson, Cerritos, Commerce, Compton, Cudahy, Downey, Gardena, Hawaiian Gardens, Hawthorne, Huntington Park, Lakewood, La Mirada, Lawndale, Lomita, Long Beach, Lynwood, Maywood, Norwalk, Paramount, Pico Rivera, Santa Clarita, Santa Fe Springs, Signal Hill, South Gate, Vernon, and Whittier.

For the purposes of this Attachment, tasks that are requirements of the Municipal Permit will be underlined. Required actions necessary to fulfill the requirements are shown in bold.

II. COMPLIANCE WITH REMAINING FIRST YEAR PERMIT REQUIREMENTS - SANTA MONICA BAY DRAINAGE BASIN

Task 2.1.8 Submit Early Action BMPs (EABMPs) during the first year of the permit for approval by the Executive Officer.



3. Adopt a runoff control ordinance requiring the use of BMPs during and after construction and at selected commercial and industrial establishments (Permit Tasks 3.1.2, and 3.1.4.)
4. Augment public education and outreach programs with regard to catch basins and storm drainage systems and their intended purpose.
5. Provide additional catch basin and storm water channel cleaning when and where needed.
6. Increase cleaning frequency of and number of roadside trash receptacles in areas where needed.
7. Increase street sweeping in areas where needed.
8. Create or augment a program to eliminate the improper disposal of litter, lawn/garden clippings, and pet feces into the street or areas where runoff may carry these pollutants to the storm drainage system.
9. Implement facility inspections of auto repair shops, auto body shops, auto parts and accessory shops, gasoline stations, and restaurants (Permit Task 3.1.2).
10. Encourage owners and occupants of homes or businesses to remove dirt, rubbish, and debris from their sidewalks and alleys which may contribute pollutants to urban runoff.
11. Encourage recycling of oil, antifreeze, glass, plastic, and other materials to prevent their improper disposal into the storm drainage system.
12. Encourage the proper disposal of Household Hazardous Wastes to prevent the improper disposal of such materials to the storm drainage system.
13. Encourage the proper use and conservation of water to minimize runoff from landscaped areas, lawns, golf-courses, etc.

A detailed plan, with schedule of implementation of above mentioned baseline BMPs, must be submitted to this Regional Board no later than July 1, 1993.

The Additional BMP plans submitted are inadequate for control of pollutants from residential, commercial, and industrial sites. Greater detail must be provided and a revised schedule for implementation must be submitted. ABMPs selected for implementation must supplement EABMPs and must control pollutants to the maximum extent practicable on an area-wide basis.

A plan, with schedule of implementation, for additional BMPs judged appropriate for each city or drainage basin must be developed. These ABMPs, implemented to control pollutants from residential, commercial, and industrial sites to the maximum extent practicable, must be submitted to this Regional Board no later than July 1, 1993.

Task 3.1.3 Submit for approval a plan with schedule of implementation of procedures to detect and eliminate illegal discharges and illicit disposal practice.

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does not demonstrate that the permittees possess adequate legal authority to regulate illegal discharges and illicit disposal practices to storm water drainage facilities, and to prosecute violators. While general nuisance codes and rules may exist, it is important to adopt specific legal regulations specific to storm water and urban runoff, both to educate the public at large and to consolidate the authority to enforce violations.

The City of Santa Monica and the City of Malibu have developed model ordinances which provide legal authority to enforce storm water program requirements. Similar model ordinances should to be considered by all permittees in the drainage basin. These cities' ordinances are a forward step in satisfying the legal authority requirements.

The City of Santa Monica Urban Runoff Pollution Ordinance requires the use of pollutant and runoff control measures; contains pollution control mandates for all construction sites within the city; and requires reduction in urban runoff flows from all new development.

The City of Malibu Ordinance No. 51U establishes storm water management standards, and amends the excavation and grading standards of the municipal code to comply with the Federal Clean Water Act.

A summary of all requisite legal authority to regulate illegal discharges and illicit disposal practices to drainage facilities and to prosecute violators must be submitted to this Regional Board no later than July 1, 1993. The actual sections of municipal ordinances must be submitted to this Board no later than September 17, 1993.

#### IV. MONITORING WORK PLAN FOR THE SANTA MONICA BAY WATERSHED

##### A. SUMMARY

Board staff, in evaluating the Santa Monica Bay (SMB) Watershed monitoring work-plan, considered (1) existing storm water monitoring programs in other urban areas of the State, (2) the United States Environmental Protection Agency guidance for municipal storm water permitting, (3) recent reports by the Santa Monica Bay Restoration Project on non-point source pollution, and (4) comments received by Los Angeles County during public review of the plans.

Although the monitoring plan submitted by the County and co-permittees addresses the specific objectives required by the permit (Board Order No. 90-079, Section 3.1.1), it overlooked the objective of the Storm Water Program which is to achieve a reduction of pollutants discharged through storm water and urban runoff to receiving waters. Additionally, the submittal lacks the essential elements of a comprehensive monitoring program. The proposed plan was insufficient in the following areas:

1. rationale/procedures for the selection of monitoring sites and relationship to specific objectives;
2. quality assurance/quality control procedures for field sampling, data analysis, and data management; and,
3. projected time schedules to meet the various objectives.

The list of monitoring parameters submitted are acceptable, with the addition of the biological indicator *Enterococcus*. We recommend that bacterial indicator monitoring be coordinated with existing programs of the Los Angeles County Department of Health and the City of Los Angeles for cost effectiveness. The proposed monitoring frequency is satisfactory.

For the purposes of the Monitoring Work Plan review, recommendations are in *italics*, required actions are in **bold**.

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Board staff proposes the following revisions to the monitoring plan:

1. Include enterococcus as a monitoring parameter;
2. Add the following tasks and schedule for completion;

TASKS	COMPLETION DATE	REPORT OF COMPLIANCE TO REGIONAL BOARD
a. Develop methodology to make refined estimates of pollutants discharged to Santa Monica Bay	July 1, 1993	July 15, 1993
b. Make a first estimate of pollutant loads to Santa Monica Bay on the basis of monitoring	July 1, 1994	July 15, 1994
c. Complete a basic QA/QC plan for the Storm Water Monitoring Program	July 1, 1993	July 15, 1993
d. Develop and implement a pilot project to establish monitoring of long-term trends in storm water quality	July 1, 1993	Jan 15, 1994
e. Develop monitoring for identification of sources of pollutants	July 1, 1993	Jan 15, 1994
f. Develop and implement a monitoring program to evaluate effectiveness of BMPs	Jan 1, 1994	Jan 15, 1994
g. Develop and implement a monitoring program to identify locations of illegal practices and elimination sources of pollutants	Jan 1, 1994	Jan 15, 1994
h. Develop and implement a program to evaluate storm water impacts on selected receiving waters	July 1, 1994	July 15, 1994

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Dr. Robert P. Ghirelli  
July 8, 1993  
Page 2

If further clarification is needed, please call Rod Kubomoto at  
(818) 458-3537, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours

T. A. TIDEMANSON  
Director of Public Works

  
DAVID YAMAHARA  
Assistant Deputy Director  
Waste Management Division

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THOMAS A. TIDEMANSON, Director

COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (415) 458-5100

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

FK

June 30, 1993

IN REPLY PLEASE  
REFER TO FILE

WM-3

Attention: Environmental Coordinator

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)/INDUSTRIAL ACTIVITIES PERMIT

The 1987 Amendments to the Federal Clean Water Act required the regulation of Stormwater/Urban Runoff Discharges under NPDES Permits. In California, NPDES permitting authority has been delegated by the Federal Government to the State Water Resources Control Board (SWRCB) and local California Regional Water Quality Control Boards (CRWQCB).

One of the responsibilities of industrial facilities under the NPDES program is the filing for the State's General Industrial Activities Stormwater Permit. Your facility may fall into the category which requires filing of this Permit with the SWRCB. We are enclosing a copy of the application package for your review and filing.

The enforcement agency for the NPDES General Industrial Activities Permit is the CRWQCB, not the County of Los Angeles. However, compliance with the NPDES program is a general requirement of your Industrial Waste Disposal Permit. We as a courtesy are assisting the State to distribute this information.

Questions regarding the NPDES General Industrial Activities Stormwater Permit should be directed to the SWRCB. A special number, (916) 657-0919, has been delegated for information regarding the Permit.

Your cooperation in meeting State requirements is important as jointly we can all enhance the quality of stormwater discharging into the flood control system.

Very truly yours

T. A. TIDEMANSON  
Director of Public Works

CARL SJOBERG  
Chief, Industrial Waste Planning and Control  
Industrial Waste/UGT Section

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COAST MACHINE TOOL INC  
1560 S GERHART AVE  
COMMERCE CA 90022-4289

ENVIRONMENTAL COORDINATOR  
AIRCRAFT HYDROFORMING INC  
155 E GARDENA BLVD  
CARSON CA 90248

ENVIRONMENTAL COORDINATOR  
G L PATTERSON INC  
2062 N COGSWELL RD  
SOUTH EL MONTE CA 91733-3598

ENVIRONMENTAL COORDINATOR  
MACHINERY REPAIR DIVISION  
15700 S HERON AVE  
LA MIRADA CA 90638-5205

ENVIRONMENTAL COORDINATOR  
COOK TRACTORS INC  
13728 E ALONDRA BLVD  
CERRITOS CA 90701-2391

ENVIRONMENTAL COORDINATOR  
D KEM  
13402 S SUSANA RD  
RANCHO DOMINGUEZ CA 90221-5798

ENVIRONMENTAL COORDINATOR  
LOS ANGELES COUNTY FIRE STATION #110  
4433 ADMIRALTY WAY  
VENICE CA 90292-5415

ENVIRONMENTAL COORDINATOR  
LONZA INC  
BOX 1500  
LONG BEACH CA 90801-1500

~~ENVIRONMENTAL COORDINATOR  
COAST CRANE COMPANY  
PO BOX 798  
SACRAMENTO CA 95812-0798~~

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2170 N MERCED AVE  
S EL MONTE CA 91733-2697

ENVIRONMENTAL COORDINATOR  
PACIFIC BELL  
28371 N FURNIVAL AVE  
SANTA CLARITA CA 93534

ENVIRONMENTAL COORDINATOR  
REDMAN EQUIPMENT & MFG COMPANY  
19800 S NORMANDIE AVE  
TORRANCE CA 90502-1182

ENVIRONMENTAL COORDINATOR  
BURKE VENDING  
27441 CLEARLAKE DR  
CANYON COUNTRY CA 91351-3610

~~ENVIRONMENTAL COORDINATOR  
A H CASTLE & CO  
2187 S GARFIELD  
LOS ANGELES CA 90040-1855~~

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LA HABRA CA 90631-6800

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CHAMP CORPORATION  
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MARK IV CHARTER LINES  
14800 S AVALON BLVD  
GARDENA CA 90248-2089

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CONCRETE CORING CO  
14005 S ORANGE AVE  
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ENVIRONMENTAL COORDINATOR  
C&W TRUCK & EQUIPMENT CO  
6825 EAST ROSECRANS AVE  
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REDS CATERING CO INC  
7437 S SCOUT AVE  
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9112 S GRAHAM AVE  
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COVINA CA 91754-1822

ENVIRONMENTAL COORDINATOR  
BELLWOOD ANIMAL HOSPITAL  
17435 S LAKEWOOD BLVD  
BELLFLOWER, CA 90706-6217

~~ENVIRONMENTAL COORDINATOR  
SERVICE DISTRICT #2  
155 W WASHINGTON BL  
LOS ANGELES CA 90015-3544~~

ENVIRONMENTAL COORDINATOR  
ARROWHEAD PURITAS WATER  
13109 S BUOLONG AVE  
GARDENA CA 90247-1578

ENVIRONMENTAL COORDINATOR  
WILDWOOD MOBILE COUNTRY CLUB  
6855 WESTERN AVE #N  
BUENA PARK CA 90621-3231

ENVIRONMENTAL COORDINATOR  
BICENTENNIAL PARK  
C/O CITY OF PICO RIVERA  
6615 PASSONS BLVD  
PICO RIVERA CA 90660-3998

ENVIRONMENTAL COORDINATOR  
ZACKY FOODS CO  
2000 N TYLER AVE  
SOUTH EL MONTE CA 91733-9929

ENVIRONMENTAL COORDINATOR  
SANTA FE INDUSTRIAL CATRN  
13315 E IMPERIAL HWY  
WHITTIER CA 90605-4194

ENVIRONMENTAL COORDINATOR  
STANDARD CATERING CO  
7549 E ALONDRA BLVD  
PARAMOUNT CA 90723-4098

ENVIRONMENTAL COORDINATOR  
ARCO SERV STATION  
1401 S HACIENDA BLVD  
HACIENDA HEIGHTS CA 91745-2828

ENVIRONMENTAL COORDINATOR  
FOSTER FARMS  
1913 FRNK STILES RD  
SOUTH EL MONTE CA 91733-3716

ENVIRONMENTAL COORDINATOR  
LUSEAUX LABORATORIES INC  
16816 S GRAMERCY PL  
GARDENA CA 90247-5282

ENVIRONMENTAL COORDINATOR  
MONSANTO CO  
800 N LINDBERGH BLVD  
ST LOUIS MI 63167

ENVIRONMENTAL COORDINATOR  
G&G PRODUCE CO  
5949 S EASTERN AVE  
COMMERCE CA 90040-4060

ENVIRONMENTAL COORDINATOR  
ELECTRONIC PLATING SERV  
13021 S BUOLONG AVE  
GARDENA CA 90247-1579

ENVIRONMENTAL COORDINATOR  
SO CALIF EDISON CO  
BOX 800 TAX DP  
ROSEMEAD CA 91770-0800

ENVIRONMENTAL COORDINATOR  
GREAT WESTERN MALTING CO  
5945 S MALT AVE  
COMMERCE CA 90040-3591

ENVIRONMENTAL COORDINATOR  
BROWN & FERRIS IND  
14905 S SAN PEDRO ST  
GARDENA CA 90247-2031

ENVIRONMENTAL COORDINATOR  
ROSENS ELEC EQUIPMENT CO  
8226 E WHITTIER BLVD  
PICO RIVERA CA 90660-2584

ENVIRONMENTAL COORDINATOR  
EODOC TECHNICAL PROD INC  
22039 S WESTWARD AVE  
LONG BEACH CA 90810-1630

ENVIRONMENTAL COORDINATOR  
CARLIN FOODS CORP  
16911 S NORMANDIE AVE  
GARDENA CA 90248-5471

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ENVIRONMENTAL COORDINATOR  
COMARCO INC  
1615 E MCKINLEY AVE  
LA VERNE CA 91750-5802

ENVIRONMENTAL COORDINATOR  
ALPHA BETA CO  
777 S HARBOR BLVD  
LA HABRA CA 90631-6800

ENVIRONMENTAL COORDINATOR  
SAN LAZARO AUTO REPAIR  
2547 N ROSEMEAD BLVD  
SOUTH EL MONTE CA 91733-1531

ENVIRONMENTAL COORDINATOR  
CHROME CRANKSHAFT CO  
6845 E FLORENCE PL  
BELL GARDENS CA 90201-3295

ENVIRONMENTAL COORDINATOR  
COX OIL CO INC  
16325 E OLD VALLEY BLVD  
LA PUENTE CA 91744-5550

ENVIRONMENTAL COORDINATOR  
ACHE PAINT & BODY INC  
13 S EASTHILL DR  
WEST COVINA CA 91791-3450

ENVIRONMENTAL COORDINATOR  
COMMERCE CATERING CO  
5133 E WASHINGTON BLVD  
LOS ANGELES CA 90040-1240

ENVIRONMENTAL COORDINATOR  
CASUAL LAMPS OF CALIF  
BOX 2168  
GARDENA CA 90247-2168

ENVIRONMENTAL COORDINATOR  
BAILEY RUG CLEANERS  
17916 S BELLFLOWER BLVD  
BELLFLOWER CA 90706-6616

ENVIRONMENTAL COORDINATOR  
~~BELVEDERE PARK~~  
W OLYMPIC BLVD  
ANGELES CA 90015

ENVIRONMENTAL COORDINATOR  
STANDARD CATERING CO  
7549 E ALONDRA BLVD  
PARAMOUNT CA 90723-4098

ENVIRONMENTAL COORDINATOR  
CHEMIFAX  
6423 E BANDINI BLVD  
COMMERCE CA 90040-1749

ENVIRONMENTAL COORDINATOR  
TLC SELF SERVE GAS  
4332 E LIVE OAK AVE  
ARCADIA CA 91006-5532

ENVIRONMENTAL COORDINATOR  
SO EL MONTE CITY MAINT YD  
1415 N SANTA ANITA AVE  
SOUTH EL MONTE CA 91733-3389

ENVIRONMENTAL COORDINATOR  
CITY OF TEMPLE CITY  
BOX 668  
TEMPLE CITY CA 91780-0668

ENVIRONMENTAL COORDINATOR  
CONVENIENT CATERING INC  
1538 S GERHART AVE  
COMMERCE CA 90022-4229

ENVIRONMENTAL COORDINATOR  
CROMIER CHEVROLET CO  
PO BOX 1468  
LONG BEACH CA 90801-1468

ENVIRONMENTAL COORDINATOR  
SOUTH BAY STUDIOS  
20434 S SANTA FE AVE  
CARSON CA 90810

ENVIRONMENTAL COORDINATOR  
BLUE BARREL DISPOSAL CO  
BOX 98  
NEWHALL CA 91321-0098

ENVIRONMENTAL COORDINATOR  
SHASTA BEVERAGES  
14405 E ARTESIA BLVD  
LA MIRADA CA 90638-5886

ENVIRONMENTAL COORDINATOR  
ZAKARIAN MOTORS  
9207 E VALLEY BLVD  
ROSEMEAD CA 91770-1921

ENVIRONMENTAL COORDINATOR  
RHONE-POULENC BASIC CHEM  
BOX 22776  
LONG BEACH CA 90801-5776

ENVIRONMENTAL COORDINATOR  
HENKEL CORP EMERY GROUP  
5568 E 61ST ST  
LOS ANGELES CA 90040-3492

ENVIRONMENTAL COORDINATOR  
UNION PACIFIC RAILROAD  
ROOM 930  
1416 DODGE ST  
OMAHA NE 68179

ENVIRONMENTAL COORDINATOR  
ARCO PETROLEUM PRODUCT COMPANY  
1801 E SEPULVEDA BLVD  
CARSON CA 90745-6121

ENVIRONMENTAL COORDINATOR  
CAL TEK INDUSTRIES  
C/O VIRGINIA SMITH  
401 S BURNSIDE AVE, APT #9K  
LOS ANGELES CA 90036-5318

ENVIRONMENTAL COORDINATOR  
SHELL OIL CO - DOM DEF  
BOX 6249  
CARSON CA 90749-6249

ENVIRONMENTAL COORDINATOR  
WINDWARD YACHT & REPAIR  
13645 FIJI WAY  
MARINA DEL REY CA 90292-6986

ENVIRONMENTAL COORDINATOR  
CALIF HAWAIIAN SUGAR CO  
BOX 4126  
CONCORD CA 94524-4126

ENVIRONMENTAL COORDINATOR  
MARTIN LUTHER KING GEN HOSPITAL  
12021 S WILMINGTON AVE  
LOS ANGELES CA 90059-3099

ENVIRONMENTAL COORDINATOR  
THE PILLSBURY CO  
5471 E FERGUSON DR  
LOS ANGELES CA 90022-5194

ENVIRONMENTAL COORDINATOR  
FLETCHER OIL COMPANY  
BOX 548  
CARSON CA 90748-0548

ENVIRONMENTAL COORDINATOR  
FAST DEER BUS CHARTER  
4814 E WASHINGTON BLVD  
COMMERCE CA 90040-1140

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ENVIRONMENTAL COORDINATOR  
SHELL OIL CO - WILM REF  
BOX 6249  
CARSON CA 90749-6249

~~ENVIRONMENTAL COORDINATOR  
CHEVRON CHEMICAL CO  
3344 E MEDFORD ST  
LOS ANGELES CA 90063-2582~~

ENVIRONMENTAL COORDINATOR  
PITCHESS HONOR RANCHO  
550 S VERMONT AVE  
LOS ANGELES CA 90020

ENVIRONMENTAL COORDINATOR  
UNION OIL CO BULK STATION  
13707 S BROADWAY  
LOS ANGELES CA 90061-1082

ENVIRONMENTAL COORDINATOR  
LUBRICATION CO OF AMERICA  
C/O MARY IVEY  
3211 ORLANDO RD  
PASADENA CA 91107-5539

ENVIRONMENTAL COORDINATOR  
VE POLENC  
100 WORTH ST  
LOS ANGELES CA 90063-1630

ENVIRONMENTAL COORDINATOR  
LEVER BROTHERS CO - V#826  
390 PARK AVE  
NEW YORK NY 10022

ENVIRONMENTAL COORDINATOR  
LUBRICATION SPECIALTIES CO  
5814 E 61ST ST  
LOS ANGELES CA 90040-3493

ENVIRONMENTAL COORDINATOR  
PACIFIC DISPERSIONS INC  
4615 E ARDINE ST  
CUDAHY CA 90201-5821

ENVIRONMENTAL COORDINATOR  
PARAMOUNT PETROLEUM CORP  
1 S DOWNEY AVE  
PARAMOUNT CA 90723-4526

ENVIRONMENTAL COORDINATOR  
DIAMOND BAR HIGH SCHOOL  
880 S LEMCH AVE  
WALNUT CA 91789-2931

ENVIRONMENTAL COORDINATOR  
PALMDALE SCHOOL DISTRICT  
BOX 902500  
PALMDALE CA 93590-2500

ENVIRONMENTAL COORDINATOR  
LAKEWOOD ANIMAL HOSPITAL  
17801 S LAKEWOOD BLVD  
BELLFLOWER CA 90706-6499

ENVIRONMENTAL COORDINATOR  
ENGS MOTOR TRUCK CO  
8830 E SLAUSON AVE  
PICO RIVERA CA 90660-4439

ENVIRONMENTAL COORDINATOR  
L A CO ROAD DEPT  
MAINTENANCE DIVISION  
5530 W 83RD ST  
LOS ANGELES CA 90045-3309

ENVIRONMENTAL COORDINATOR  
MANNING FOODS USA INC  
9531 E BEVERLY RD  
PICO RIVERA CA 90660-2134

ENVIRONMENTAL COORDINATOR  
TEXACO INC-RESEARCH PLANT  
BOX 400  
MONTEBELLO CA 90640-0400

ENVIRONMENTAL COORDINATOR  
SO CALIF EDISON CO  
134 W BOX 800 TAX DP  
ROSEMEAD CA 91770-0800

ENVIRONMENTAL COORDINATOR  
GKN RENTALS  
100 E CHAPARRAL  
ANAHEIM CA 92805

ENVIRONMENTAL COORDINATOR  
PET SET INN  
14423 S CRENSHAW BLVD  
GARDENA CA 90249-3142

ENVIRONMENTAL COORDINATOR  
CITY OF LAWDALE GARAGE  
14717 BURIN AVE  
LAWDALE CA 90260-1497

ENVIRONMENTAL COORDINATOR  
VAUGHANS IND REPAIR  
16224 S GARFIELD AVE  
PARAMOUNT CA 90723-4879

ENVIRONMENTAL COORDINATOR  
NATIONAL STARCH & CHEM CO  
6455 E CANNING ST  
COMMERCE CA 90040-3121

ENVIRONMENTAL COORDINATOR  
ROHM AND HAAS COMPANY  
BOX 442B  
COMPTON CA 90224-442B

ENVIRONMENTAL COORDINATOR  
CALIF MILK PRODUCERS  
11709 E ARTESIA BLVD  
ARTESIA CA 90701-3898

ENVIRONMENTAL COORDINATOR  
NISSIN FOODS INC  
2001 W ROSECRANS AVE  
GARDENA CA 90249-2994

~~ENVIRONMENTAL COORDINATOR  
MATTER MFG DIV - VSI CORP  
9440 E GIDLEY ST  
TEMPLE CITY CA 91780-4211~~

ENVIRONMENTAL COORDINATOR  
KOLD KIST  
5329 E WASHINGTON BLVD  
LOS ANGELES CA 90040-2183

ENVIRONMENTAL COORDINATOR  
MICHELOU & LOQUE CAR WASH  
4114 YALETON AVE  
COVINA CA 91722-3829

ENVIRONMENTAL COORDINATOR  
MILLER BREWING CO  
ACCOUNTS PAYABLE  
15801 E FIRST ST  
IRVINDALE CA 91706-2069

ENVIRONMENTAL COORDINATOR  
THOMPSON MECHANICAL CORP  
19002 S SANTA FE AVE  
COMPTON CA 90221-5909

ENVIRONMENTAL COORDINATOR  
PULTZMEISTER THOMSEN DIV  
18501 S MAIN ST  
GARDENA CA 90248-4613

ENVIRONMENTAL COORDINATOR  
GAF BUILDING MATERIALS  
11800 INDUSTRY AVE  
FONTANA CA 92335-6953

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION



CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91734-2156  
(213) 266-7500  
FAX: (213) 266-7600

June 17, 1993

Thomas A. Tidemanson, Director  
Department of Public Works  
County of Los Angeles  
900 S. Fremont Avenue  
Alhambra, CA 91803-1331

MUNICIPAL STORM WATER PERMIT FOR LOS ANGELES COUNTY - REVIEW OF  
SECOND YEAR COMPLIANCE (NPDES No. CA0061654, CI File No. 6948)

The County of Los Angeles, as principal permittee for the above NPDES permit, has submitted information required in the permit for second year compliance. On January 11, 1993, in the interest of timely implementation, we transmitted our letter approving the proposed Storm Water Monitoring Program and Early Action Best Management Practice Plans and our recommendations. A Regional Board workshop was conducted on January 25, 1993, to solicit comments from permittees and the public on these recommendations to the program. Comments were received from the Los Angeles County Department of Public Works and other co-permittees, three environmental groups, and the U.S. Environmental Protection Agency. Staff has reviewed all comments and made revisions to the recommendations. Enclosed as Attachment 1 are comments on the second year compliance submittals. Attachment 2 contains review comments on the Storm Water Monitoring Program.

We request that you respond to comments contained in the Attachments by July 1, 1993. We will present the results of this Review of Second Year Compliance at the July 19 Board meeting, to be held at Glendale City Hall, 613 E. Broadway, Glendale, at 9:30 a.m.. Responses to comments from the County of Los Angeles may be presented at this time.

Staff of the Los Angeles County Department of Public Works has improved co-permittee participation and communication between permittees and the Regional Board in the past year by conducting monthly action meetings for the different phases. I encourage the continuation of this communication, and believe that this level of effort at coordination must be sustained to ensure the success of the storm water program.

If you have any questions regarding the second year comments or requirements, please call me at (213) 266-7510, or have your staff call Mark Pumford at (213) 266-7596.

*Robert P. Ghirelli*

ROBERT P. GHIRELLI, D.Env.  
Executive Officer

cc: See mailing list

Enclosures

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MUNICIPAL STORM WATER PERMIT FOR LOS ANGELES COUNTY  
ATTACHMENT 1, PAGE 2

representatives when requested. The SWPPP establishes procedures adopted by the site operator to prevent the pollution of storm water leaving the site, and is an important document to verify proper practices.

3. Industrial Sites - Municipal permittees are to develop a storm water enforcement program which at a minimum shall include the inspection of industrial and commercial sites for compliance with municipal storm water pollution prevention programs. Such a program may utilize the Storm Water Pollution Prevention Plan (SWPPP) to verify compliance at facilities subject to the State of California General Industrial Storm Water Permit, and for notification of Regional Board staff for follow-up action.

4. Model Proposals - The City of Los Angeles and the City of Torrance have proposed and implemented noteworthy storm water programs and policies which may be effective in the prevention of runoff pollution. Regional Board staff suggests that all permittees consider such programs for potential implementation.

At the January 27, 1992, and January 25, 1993, Board meetings, staff presented reviews of compliance with first and second year requirements of the municipal storm water permit, respectively. At that time, not all requirements for Year 1 had been completed and some were carried over to Year 2.

During the first year of the Permit (July 1, 1990 - June 30, 1991), the cities and entities within the Santa Monica Bay Drainage Basin were phased into the Storm Water Program - 19 cities, the County of Los Angeles, Caltrans, and unincorporated areas of Ventura County.

The City of Thousand Oaks, which has a portion draining to the Santa Monica Bay Drainage Basin, submitted Part 1 and Part 2 application for a separate Municipal Storm Water Discharge Permit for that portion on March 25, 1992 and March 25, 1993, respectively. The City of Thousand Oaks is cooperating with the County of Los Angeles to ensure that all necessary information, data compilation, BMP compilation, and other relevant information is completed in a timely manner.

On July 1, 1992, 36 entities from the Upper Los Angeles River and the Upper San Gabriel River Drainage Basins became permittees under Phase II of the storm water permit. These cities in the Upper Los Angeles River Basin are: Burbank, Glendale, Hidden Hills, and San Fernando. Cities in the Upper San Gabriel River Drainage Basin are: Alhambra, Arcadia, Azusa, Baldwin Park, Bradbury, Claremont, Covina, Diamond Bar, Duarte, El Monte, Glendora, Industry, Irwindale, La Cañada Flintridge, La Habra Heights, La Puente, La Verne, Monrovia, Montebello, Monterey Park, Pasadena, San Dimas, San Gabriel, San Marino, Sierra Madre, South El Monte, South Pasadena, Temple City, Walnut, and West Covina.

On July 1, 1993, 30 entities from the Lower Los Angeles River and the Lower San Gabriel River Drainage Basins will become permittees under Phase III of the storm water permit. These entities include: Artesia, Bell, Bellflower, Bell Gardens, Carson, Cerritos, Commerce, Compton, Cudahy, Downey, Gardena, Hawaiian Gardens, Hawthorne, Huntington Park, Lakewood, La Mirada, Lawndale, Lomita, Long Beach, Lynwood, Maywood, Norwalk, Paramount, Pico Rivera, Santa Clarita, Santa Fe Springs, Signal Hill, South Gate, Vernon, and Whittier.

For the purposes of this Attachment, tasks that are requirements of the Municipal Permit will be underlined. Required actions necessary to fulfill the requirements are shown in bold.

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MUNICIPAL STORM WATER PERMIT FOR LOS ANGELES COUNTY  
ATTACHMENT 1, PAGE 5

The Additional BMP plans submitted are inadequate for control of pollutants from residential, commercial, and industrial sites. Greater detail must be provided and a revised schedule for implementation must be submitted. ABMPs selected for implementation must supplement EABMPs and must control pollutants to the maximum extent practicable on an area-wide basis.

A plan, with schedule of implementation, for additional BMPs judged appropriate for each city or drainage basin must be developed. These ABMPs, implemented to control pollutants from residential, commercial, and industrial sites to the maximum extent practicable, must be submitted to this Regional Board no later than July 1, 1993.

Task 3.1.3 Submit for approval a plan with schedule of implementation of procedures to detect and eliminate illegal discharges and illicit disposal practice.

The plans submitted to comply with this requirement are inadequate. Some permittees have proposed only the standardization of hazardous material spill containment capabilities and response procedures to improve containment and clean-up. The standardization of containment procedures is not in itself sufficient and as such does not satisfy permit requirements. Other permittees omitted information altogether.

A plan, with schedule of implementation of procedures to detect and eliminate illegal discharges and illicit disposal practices, must be submitted to this Regional Board no later than July 1, 1993.

Task 3.1.4 Submit for approval a plan with schedule of implementation of measures to control pollutants in surface runoff from construction sites.

Board staff's review of plans submitted for this requirement determined that the ABMPs for control of pollutants from construction sites are inadequate. More detail must be provided and a revised schedule for implementation must be submitted. ABMPs selected for implementation must supplement EABMPs.

One permittee responded that because all undeveloped lots in its jurisdiction are less than one tenth of an acre in size, no plan to control pollutants or sediments is necessary other than simply sand bagging. This may be true for sediment or erosion control but does not necessarily control waste materials generated during construction. A plan for the control of pollutants for construction sites is required regardless of size under the municipal compliance program. Construction activity may include any disturbance of soil including excavation, grading, and demolishing.

Another permittee has proposed to make construction contractors aware of permit regulations and the problems associated with contaminated runoff. Such measures may be adequate for certain municipalities but are most effective if practiced across municipal jurisdictions. In addition, other BMPs must be considered.

A plan, with schedule of implementation of measures to control pollutants in surface runoff from construction sites, must be submitted to this Regional Board no later than July 1, 1993.

Task 3.2 Evidence of satisfactory progress of implementation of plan and schedule for early action BMPs

The Cities of Torrance and Los Angeles have implemented EABMPs in advance of the Executive Officer's approval. These cities are the only permittees in compliance with this requirement. Progress

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**MUNICIPAL STORM WATER PERMIT FOR LOS ANGELES COUNTY  
ATTACHMENT 1, PAGE 6**

made by these municipalities is very positive. Permittees should consider the implementation of similar programs and/or practices. Staff commends the initiative taken by these cities. Other cities have indicated that they have implemented EABMPs as well, but no documentation has been submitted to the Regional Board.

**Evidence of satisfactory progress of implementation of plan and schedule for early action BMPs and additional BMPs must be submitted to this Regional Board no later than July 1, 1993.**

Task 3.3 Evidence of all requisite legal authority to regulate illegal discharges and illicit disposal practices to drainage facilities, and to prosecute violators

The Permit Implementation Agreement submitted to the Board to satisfy Task 3.3 is an agreement between permittees which establishes responsibilities with respect to compliance with the Storm Water Permit. The agreement, however, does not demonstrate that the permittees possess adequate legal authority to regulate illegal discharges and illicit disposal practices to storm water drainage facilities, and to prosecute violators. While general nuisance codes and rules may exist, it is important to adopt specific legal regulations specific to storm water and urban runoff, both to educate the public at large and to consolidate the authority to enforce violations.

The City of Santa Monica and the City of Malibu have developed model ordinances which provide legal authority to enforce storm water program requirements. Similar model ordinances should to be considered by all permittees in the drainage basin. These cities' ordinances are a forward step in satisfying the legal authority requirements.

The City of Santa Monica Urban Runoff Pollution Ordinance requires the use of pollutant and runoff control measures; contains pollution control mandates for all construction sites within the city; and requires reduction in urban runoff flows from all new development.

The City of Malibu Ordinance No. 51U establishes storm water management standards, and amends the excavation and grading standards of the municipal code to comply with the Federal Clean Water Act.

**A summary of all requisite legal authority to regulate illegal discharges and illicit disposal practices to drainage facilities and to prosecute violators must be submitted to this Regional Board no later than July 1, 1993. The actual sections of municipal ordinances must be submitted to this Board no later than September 17, 1993.**

**IV. CONCLUSION AND RECOMMENDATIONS**

Permittee and co-permittee compliance with storm water permit requirements is improving. The variety of approaches taken by the majority of permittees to meet permit requirements was not conducive of an area-wide program. With an increased level of compliance, a workable comprehensive storm water/urban runoff management program for Los Angeles County may be achieved.

Board staff suggests that permittees share information and discuss submittals to insure an effective area-wide comprehensive program.

Staff believes that specific EABMPs submitted which are regionally applicable should be implemented in all areas. ABMPs selected for implementation should supplement EABMPs.

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MUNICIPAL STORM WATER PERMIT FOR LOS ANGELES COUNTY  
ATTACHMENT 2, PAGE 3

II. EVALUATION OF THE PROPOSED MONITORING PLAN

1. Objectives of the Monitoring Plan

The objectives of a comprehensive Storm Water/Urban Runoff Monitoring Program must include the following:

- (a) develop a methodology to refine annual estimates of pollutant loads to Santa Monica Bay;
- (b) determine long-term trends in the quality of storm water/urban runoff;
- (c) Improve the understanding of sources of storm water pollution;
- (d) Establish effectiveness of controls (BMPs) for specific land uses, with implication for broader implementation;
- (e) identify illegal discharges or locations of illegal disposal practices; and,
- (f) monitor effects of storm water/urban runoff on receiving water quality and water quality objectives.

The proposed monitoring plan submitted by Los Angeles County includes objectives (b) through (e), but does not address (a) and (f). *Staff proposes that (a) and (f) be included.*

2. Annual Estimates of Pollutant Loads

The proposed work-plan does not discuss this objective. The permittees in their monitoring plan proposed a pilot program of nine monitoring stations in the Santa Monica watershed to evaluate storm water quality. The permittees must modify the choice of sampling stations to include the major drainage basins in the watershed and use this pilot project to make the first estimate of pollutant loads to Santa Monica Bay. It must be recognized that the number of monitoring stations need to be increased in coming years to meet the criterion of two stations per land use category.

Annual pollutant loads and event mean concentrations (EMCs) are important parameters to assess the impact of municipal storm water discharges on receiving waters. Sampling stations to estimate pollutant loads and EMCs must include drainage basins with the largest input relative to volume and predominant land-uses. A good evaluation of the relative importance of drainage basins within the Santa Monica Bay watershed is provided in a report produced for the Santa Monica Bay Restoration Project by UCLA<sup>2</sup>. Permittees are expected to select an appropriate mathematical model (e.g. QILLUDAS, SWMM, etc.) to refine and estimate pollutant loads, and for decision-making projections. While detailed dynamic modelling for the entire Basin may be too resource intensive, a simple model for the whole Basin could be augmented with a dynamic model for large sub-basins (such as the Malibu Creek and the Ballona Creek watersheds), and single land-use sub-basins (such as the Palos Verdes Peninsula watershed). A discussion of storm water models may be found in 'Modelling of Nonpoint Source Water Quality in Urban and Non-urban Areas, Donigan and Heber'<sup>16</sup>.

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MUNICIPAL STORM WATER PERMIT FOR LOS ANGELES COUNTY  
ATTACHMENT 2, PAGE 6

schedule, field crew training, and health and safety plan. Data management, including reporting and analyses, should discuss statistical methods for analysis and reporting of data (including censored data).

A basic QA\QC Plan for the storm water monitoring program must be submitted by July 15, 1993. Specific modifications to the basic QA\QC Plan for single projects may be addressed in supplementary submittals.

9. General Comments

In addition, we have the following minor comments regarding the monitoring program:

i. Sampling

- o semi-volatiles should be collected as grab-samples*
- o metals should be done as both soluble and total*
- o Cyanide should be done as a grab sample*
- o Grab samples must be collected during the first part of the storm*
- o Flow weighting method is faulty; volume must be set by storm based on predicted runoff coefficients; bottles may have to be changed if storm is larger than expected*
- o Minimum flow volume for dry weather analysis must be reported*
- o Dry weather sampling should be done as a 24-hr composite (except for bacteriological indicators, pH, cyanide, oil and grease, semi-volatile organic compounds).*

ii. Equipment

- o Samplers must be continuously maintained and pre-storm checked*
- o Provide details on sampling and flow equipment, and data storage required.*
- o Number of bottles in sampler and volume available not described.*
- o Equipment housing procedures must be presented.*

10. References

The following section lists references used by Board staff in its review of the monitoring plan and are sources that permittees may find useful in addressing our comments.

MONITORING

1. Guidance Manual for the Preparation of Part 2 of the NPDES Permit Application for Discharges from Municipal Separate Storm Sewer Systems, 1992, EPA 833-B-92-002, USEPA OWEC [Contact EPA Storm Water Hotline at (703)821-4823]
2. Assessment of Storm Drain Sources of Contaminants to Santa Monica Bay, Vols. 1-4, Santa Monica Bay Restoration Project. 1993. [Contact Guang-yu Wang, SMBRP, (213)266-7568], (UCLA and WCC)
3. NPDES Storm Water Sampling Guidance Document, USEPA 1992, EPA 833-B-92-001, [Contact EPA

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**MUNICIPAL STORM WATER PERMIT FOR LOS ANGELES COUNTY  
ATTACHMENT 2, PAGE 7**

Stormwater Hotline at (703)821-4823]

4. Amended Monitoring Plan, Santa Clara Valley Non-point Source Pollution Control Program, December 9, 1991. [Contact Marcia Guzetta at (408)265-2600, (WCC)].
5. Guidelines for Monitoring of Urban Runoff Quality, MERL, OH, EPA-600/2-83-124, 1983, prepared for Urban Drainage and Flood Control District, Denver, CO, (Michael B. Sonnen) [Contact NTIS at (703)487-4650].
6. Analyzing Urban Runoff in the Dallas-Fort Worth Area, M.A. Collins et al. (undated) (WCC). [Contact WCC at (800)776-3296]
7. Source Identification and Control Report, 1992. Santa Clara Valley Non-point Source Pollution Control Program. [Contact Marcia Guzetta at (408)265-2600, (WCC)]

**RECEIVING WATER**

8. Annual Report, 1990/1991 Monitoring Program NPDES Permit 90-158, Sacramento County Water Agency, July 1, 1991. [Contact Donna Dean, County of Sacramento, (916) 440-6851] (Brown and Caldwell).
9. Annual Report, 1991/1992 Monitoring Program NPDES Permit 90-158, Sacramento County Water Agency, July 1, 1991. [Contact Donna Dean, County of Sacramento, (916)440-6851] (Brown and Caldwell)
10. Sediment Quality and Aquatic Life Assessment, W.J. Adams et al. 1992, Environ. Sc. Technol., Vol 26(10), pp 1865-1875.
11. Sediment Toxicity Testing, G.A. Burton and J. Scott, 1992, Environ. Sc. Technol., Vol 26(11), pp 2068-2075.

**DATA MANAGEMENT**

12. UNCENSOR: A Program to Estimate Means and Standard Deviations for Data Sets with Below Detection Limit, M.C. Newman and P.M. Dixon, 1990, American Environmental Laboratory, April 1990, pp 2630.
13. UNCENSOR Version 3.0, Newman, M. et al. 1992. [Contact Michael Newman, Savannah River Ecology Laboratory (803) 725-2472], (University of Georgia).
14. MDL Program, D.R. Helsel 1992, Water Resources Div., USGS, [Contact USGS at (703) 860-6000]
15. Less than Obvious: Statistical Treatment of Data below the Detection Limit, D.R. Helsel, 1990, Environ. Sci. Technol., Vol. 24(12), pp 1766-1774.
16. Modelling of Non-point Source Water Quality in Urban and Nonurban areas, Donigan and Heber,

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**MUNICIPAL STORM WATER PERMIT FOR LOS ANGELES COUNTY  
ATTACHMENT 2, PAGE 8**

1991, USEPA, ERL, Athens, GA, [Contact USEPA, ERL at (706) 546-3549].

17. Estimation of Descriptive Statistics for Multiply Censored Water Quality Data, D.R. Helsel and T.A. Cohn, 1988, Water Resources Research Vol. 24(12) 1997-2004.

18. The Detection Limit, P.S. Porter et al., 1988, Environ. Sci. Technol. Vol. 22(8), pp 856-861.

19. Statistical Methods in Water Resources, D.R. Helsel and R.M. Hirsch. 1992, Studies in Environmental Science 49, Elsevier Science Publications, New York, NY. 522 pp.

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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**

**LOS ANGELES REGION**

CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91734-2156  
(213) 266-7500  
FAX: (213) 266-7600



June 4, 1993

Jerry Baxter  
California Department  
of Transportation  
120 S. Spring Street  
Los Angeles, CA 90012

**WASTE DISCHARGE REQUIREMENTS FOR STORMWATER/URBAN RUNOFF  
DISCHARGE FOR LOS ANGELES COUNTY AND CO-PERMITTEES (NPDES  
CA0061654, CI 6948)**

On June 18, 1990, this Regional Board adopted Order No. 90-079 (NPDES No. CA0061654) regulating stormwater and urban runoff discharges from separate storm sewers throughout Los Angeles County. The California Department of Transportation (Caltrans) is a Co-Permittee under this NPDES municipal storm water discharge permit. Caltrans has made submittals required under Year I and Year II of this permit. Staff has reviewed these submittals and noted the following inadequacies:

1. Caltrans submitted their Early Action Best Management Practices (EABMPs) and Additional BMPs to the Regional Board on January 23, 1992, and July 2, 1992, respectively. Insufficient information was submitted regarding these BMPs to adequately evaluate their appropriateness or potential effectiveness. Detailed information, including procedures and frequency of individual BMP implementation, must be submitted for Executive Officer approval.
2. Construction activity under Caltrans contracts vary in size throughout the Los Angeles area. Projects that result in the soil disturbance of 5 acres or more of total land area or which is part of a larger common area of development is subject to the California NPDES General Storm Water Discharge Permit for Construction Activity and would require the implementation of a Storm Water Pollution Prevention Plan. Caltrans, under NPDES Municipal Storm Water Discharge Permit No. CA0061654 is responsible for insuring that all of its construction projects regardless of size are in compliance with all local, state, and federal requirements.

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FROM: LA CO DPW LOP

TO:

2132667626

JUN 3, 1993 2:51PM #742 P.01

NPDES CO-PERMITTEES

PHASE I

21 Co-Permittees

19 Cities

Caltrans (Phases I, II, and III)

Ventura County

PHASE II

39 Co-Permittees

36 New Cities

1 Phases I, II, and III City

1 Phase I City

Caltrans (Phases I, II and III)

PHASE III

47 Co-Permittees

30 New Cities

1 Phases I, II, and III City

8 Phase I Cities

7 Phase II Cities

Caltrans (Phases I, II, and III)

Post-It™ brand fax transmittal memo 7671		# of pages • 2
To Carlos Urbaga	From Frank Kur	
Co. CRWQCB	Co. LADPW	
Dept.	Phone # (818) 458-3394	
Fax # (818) 266-7600	Fax # (818) 458-4372	

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PHASE I

Agoura Hills  
Beverly Hills  
Calabasas  
Caltrans  
Culver City  
El Segundo  
Hermosa Beach

Inglewood  
Los Angeles  
Malibu  
Manhattan Beach  
Palos Verdes Estates  
Rancho Palos Verdes  
Redondo Beach

Rolling Hills  
Rolling Hills Estates  
Santa Monica  
Torrance  
Ventura County  
West Hollywood  
Westlake Village

PHASE II

Alhambra  
Arcadia  
Azusa  
Baldwin Park  
Bradbury  
Burbank  
Calabasas  
Caltrans  
Claremont  
Covina  
Diamond Bar  
Duarte  
El Monte

Glendale  
Glondora  
Hidden Hills  
Industry  
Irwindale  
La Cañada Flintridge  
La Habra Heights  
La Puente  
La Verne  
Los Angeles  
Monrovia  
Montebello  
Monterey Park

Pasadena  
Pomona  
Rosemead  
San Dimas  
San Fernando  
San Gabriel  
San Marino  
Sierra Madre  
South El Monte  
South Pasadena  
Temple City  
Walnut  
West Covina

PHASE III

Alhambra  
Arcadia  
Azusa  
Baldwin Park  
Bradbury  
Burbank  
Caltrans  
Claremont  
Covina  
Diamond Bar  
Duarte  
El Monte  
Glendale  
Hermosa Beach

Inglewood  
La Cañada Flintridge  
La Habra Heights  
Los Angeles  
Monrovia  
Montebello  
Monterey Park  
Palos Verdes Estates

Pasadena  
Rancho Palos Verdes  
Redondo Beach  
Rolling Hills  
Rolling Hills Estates  
South Pasadena  
Torrance  
West Hollywood  
Westlake Village

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COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-3100

THOMAS A. TIDEMANSON, Director

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

Handwritten notes: AP 5-10, CU

April 29, 1993

IN REPLY PLEASE REFER TO FILE: WM-3  
COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

Dr. Robert P. Ghirelli  
Executive Officer  
California Regional Water  
Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Dr. Ghirelli:

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT  
NO. CA0061654 (CI6948) - QUARTERLY PROGRESS REPORT (1993 1 Q) #11.

The following report is submitted in compliance with the above-captioned Permit, which was issued on June 18, 1990. This report provides a summary on the status of specific Permit tasks performed during the second quarter (January 1, 1993 through March 31, 1993) of the third year of the Permit which began on July 1, 1990.

Phase I (Santa Monica Bay Drainage Basin)

During this period, the Principal Permittee continued to organize and chair the monthly Co-Permittee meetings to coordinate Permit compliance. Enclosed is a chart summarizing the attendance record of the Co-Permittees (Attachment A).

The Permittees are awaiting formal response from your agency to their comments made in response to your January 11, 1993 Permit Compliance Report. The Co-Permittees are taking a proactive approach to address the concerns noted in your report by working on the recommended 13 Best Management Practices. The Department of Public Works (DPW) is revising the stormwater/urban runoff monitoring program based on the recommendations in your report and received in follow-up meetings with your staff.

We anticipate installing our first automated fixed site monitoring station, which will be in Ballona Creek, in May of this year. Procurement of the automated sampling equipment and scheduling of the design work needed for the installation of samplers for the other sites has been initiated.

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Dr. Robert P. Ghirelli  
April 29, 1993  
Page 2

The Permit Implementation Agreement which established the framework among all Permittees to comply with the Permit has been executed by 21 of the 22 Phase I Permittees, the exception being the City of Los Angeles. The Permittees have also been developing a list of common non-stormwater discharges which flow into the drain system. As part of the effort, recommendations were being developed for the handling of these discharges. Per advice by your staff, however, we have postponed the effort until more direction can be provided by the California State Water Resources Control Board.

Progress continues on the DPW pilot inspection program for Ballona Creek. We have completed a detailed inventory of all connections to the open channel portion of Ballona Creek. We have been successful, with the assistance of Culver City, in terminating an illegal sanitary sewer bypass connection that was discharging raw sewage into the channel. Additional investigations and enforcement efforts are being pursued.

DPW, as Principal Permittee, has prepared an informational brochure targeted for interested parties such as politicians, implementors, and professional groups. All Co-Permittees have been offered these brochures for their use. Also, presentations have been conducted with the Southeast Area City Managers Association and the Southbay Area City Managers Association to further enhance awareness and support of the Municipal Stormwater Program.

We are also continuing active participation with the Santa Monica Bay Restoration Project and the Malibu Creek Watershed Natural Resource Plan working committees in support of regional efforts to enhance the quality of stormwater.

Phase I Co-Permittees interested in providing information on the progress of their individual Permit implementation efforts have been asked to provide such information in writing. We have, to date, not received any response for the Co-Permittees.

Phase II (Upper Los Angeles River and Upper San Gabriel River Drainage Basins)

During this period, the Principal Permittee has organized and chaired monthly Co-Permittee meetings to coordinate Permit compliance. Enclosed is a chart (Attachment B) summarizing the Permit submittal compliance status of each Co-Permittee. Also enclosed (Attachment C) is a chart reflecting the attendance record of the Co-Permittees.

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## MONTHLY PERMITTEE MEETING ATTENDANCE

### Phase I Cities

Meeting Date	Agoura Hills	Beverly Hills	Calabasas	Cakram	Culver City	El Segundo	Hermosa Beach	Inglewood	Los Angeles	Malibu	Manhattan Beach
April 21, 1992					1	1	1	1	1		1
May 19, 1992	1		1	1	1	1	1	1	1	1	1
June 23, 1992	1	1	1	1	1	1	1		1	1	1
July 21, 1992	1			1	1	1	1	1	1		
August 18, 1992	1	1	1			1	1	1	1	1	
September 22, 1992			1		1			1	1	1	1
October 20, 1992	1		1		1	1		1	1	1	
November 17, 1992		1	1		1	1		1	1	1	
January 19, 1993	1	1	1		1	1	1	1	1	1	
February 2, 1993	1	1		1	1	1		1	1	1	
February 16, 1993		1	1		1	1		1	1	1	
March 16, 1993	1	1			1				1		1
April 20, 1993		1	1		1	1	1	1	1	1	1
<b>TOTAL</b>	<b>8</b>	<b>8</b>	<b>9</b>	<b>4</b>	<b>12</b>	<b>11</b>	<b>7</b>	<b>11</b>	<b>13</b>	<b>9</b>	<b>6</b>

Meeting Date	Palos Verdes Est	Rancho Palos Verdes	Redondo Beach	Rolling Hills	Rolling Hills Est	Santa Monica	Thousand Oaks	Torrance	West Hollywood	Westlake Village	Ventura Co
April 21, 1992	1	1		1		1	1	1	1		
May 19, 1992		1				1	1	1	1	1	1
June 23, 1992	1	1		1		1	1	1	1	1	
July 21, 1992	1	1	1			1	1	1	1		
August 18, 1992	1	1				1	1	1	1		
September 22, 1992						1	1	1	1	1	1
October 20, 1992			1			1	1		1	1	
November 17, 1992			1			1			1	1	
January 19, 1993	1	1		1		1		1	1	1	1
February 2, 1993			1	1	1	1		1	1		1
February 16, 1993	1	1	1	1			1	1		1	1
March 16, 1993	1	1	1					1			1
April 20, 1993	1	1		1		1	1	1	1	1	1
<b>TOTAL</b>	<b>8</b>	<b>9</b>	<b>6</b>	<b>6</b>	<b>1</b>	<b>11</b>	<b>9</b>	<b>11</b>	<b>10</b>	<b>9</b>	<b>6</b>

SEM/A/PHASEI/ATTENDI.WK3

R0033143

VOL 11

**MONTHLY PERMITTEE MEETING ATTENDANCE**

Phase II Cities

Meeting Date	Alhambra	Arroyo	Azusa	Baldwin Park	Brea	Burbank	Calabasas	Calheim	Chico	Compton	Diamond Bar	El Monte	Fullerton	Garden Grove	Glendale	Industry	Irving	Orange	Pasadena	Rosemead	San Gabriel	San Marino	Sierra Madre	South Pasadena	Temple City	West Covina
August 1, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
September 2, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
October 7, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
November 4, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
December 2, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
January 3, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
February 1, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
March 1, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
April 7, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
TOTAL	8	6	6	8	2	7	1	1	7	8	8	7	7	8	7	2	6	1	4							

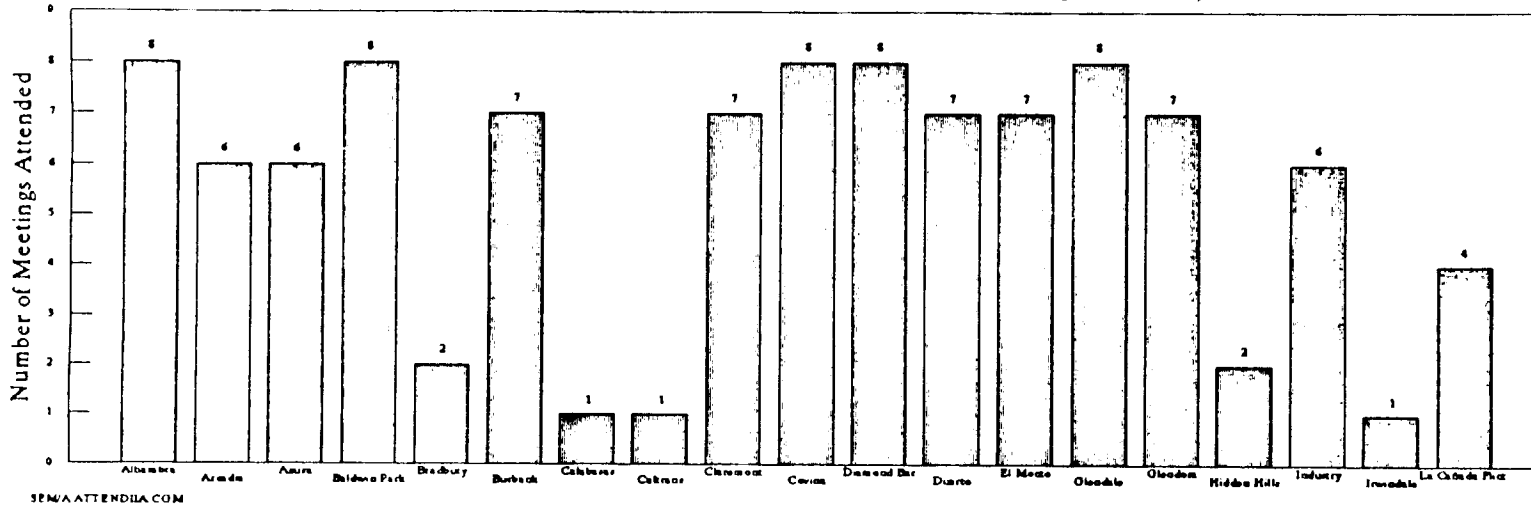
Meeting Date	Alhambra	La Puente	La Verne	Los Angeles	Monrovia	Montebello	Monterey Park	Pasadena	Pomona	Rosemead	San Dimas	San Fernando	San Gabriel	San Marino	Sierra Madre	South Pasadena	Temple City	Walnut	West Covina
August 1, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
September 2, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
October 7, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
November 4, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
December 2, 1992	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
January 3, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
February 1, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
March 1, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
April 7, 1993	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
TOTAL	5	5	5	8	6	7	5	8	6	7	7	7	5	1	1	1	6	5	6

R0033144

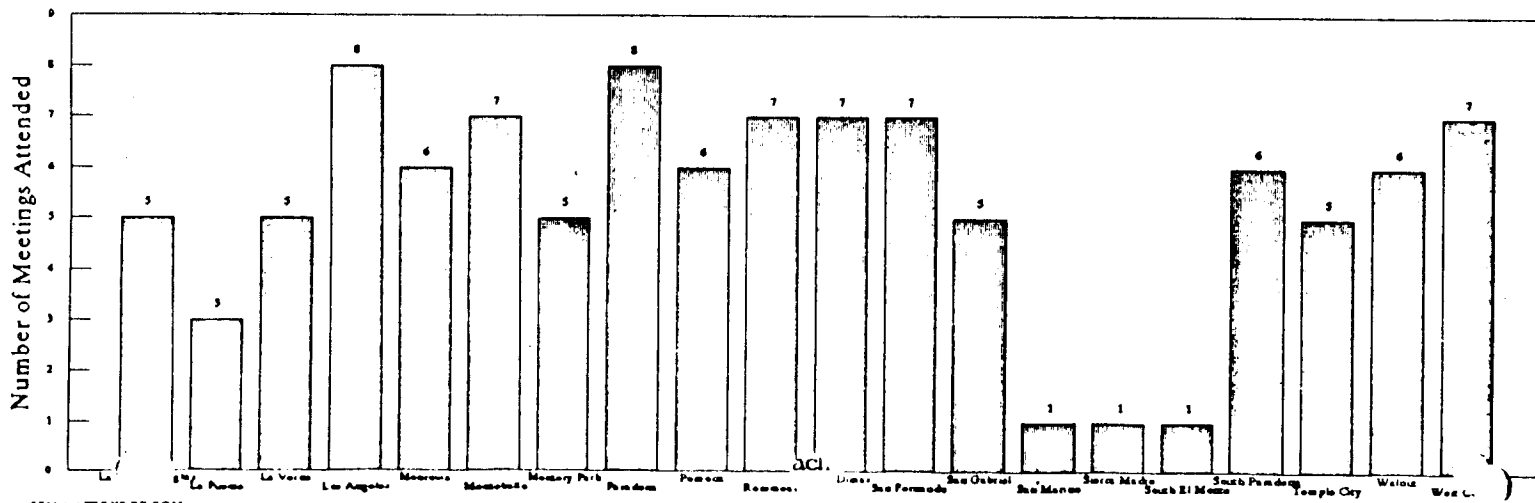
V O L 11

# Phase II Agencies MONTHLY PERMITTEE MEETING ATTENDANCE

Number of Meetings to Date: 8 (August 5, 1992 to April 7, 1993)



2/11/03



Attachment C

R0033145

VOL 11 0000000000

**STATUS OF ACTIVITIES FOR PHASE II AGENCIES**  
as of May 3, 1993

Drug Lines	Activities	Hambra	Arcadia	Azusa	Baldwin Park	Bradbury	Burbank	Calabasas	Caltrans	Claremont	Covina	Diamond Bar	Quarte	El Monte	Glendale	Glendora	Hidden Hills	Industry	Inwindsle	LaCaAsds Flinthshpe
Sep 30 1992	Submittal of Existing Rainfall Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92
	Submittal of Existing Flow Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92
	Submittal of Existing Water Quality Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	12/02/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92
Oct 31 1992	Alignment of Stormdrain	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		07/14/92	10/26/92	10/29/92	10/26/92	08/13/92	11/02/92	11/03/92	11/03/92	10/28/92		11/03/92
	Identification of Natural Drainage Watercourses	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		07/14/92	10/26/92	10/29/92	10/26/92	08/13/92	11/02/92	11/03/92	11/03/92	10/28/92		11/03/92
	Identification of Private Drainage Systems	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		07/14/92	10/26/92	10/29/92	11/04/92	10/26/92	08/13/92	11/01/92	11/03/92	11/25/92		12/03/92
	Definition of Drainage Boundaries	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		09/15/92	10/27/92	11/02/92	11/04/92	10/26/92	11/03/92	11/04/92	11/03/92	11/25/92		12/03/92
Nov 30 1992	Determination of Existing BMPs for Construction Sites	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		02/03/93
	Existing BMPs for Illegal Discharge & Disposal Practices	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		01/04/93
	Existing BMPs for Residential, Commercial, & Industrial	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		01/04/93
		12/01/92	12/01/92	11/30/92	12/03/92	12/01/92		NA		09/02/92	12/01/92	12/01/92	11/16/92	12/01/92	12/01/92	12/01/92	12/01/92	11/30/92		01/04/93
Feb 1 1993	Identification of Waste Disposal Facilities	02/01/93	01/28/93	02/03/93	08/27/92	11/02/92		NA	10/14/92	07/14/92	01/26/93	01/19/93	09/17/92	01/25/93	02/16/93	01/25/93	11/03/92	01/19/93		02/03/93
		02/01/93	02/06/93	04/22/93	09/16/92	11/03/92		NA	10/14/92	07/16/92	01/27/93	01/17/93	11/02/92	02/01/93	01/25/93	11/03/92	02/16/93		02/03/93	
Mar 1 1993	Identification of Industries by SIC Code	02/17/93	11/02/92	11/30/92	02/17/93			NA		02/08/93	03/04/93	02/16/93	03/11/93	03/22/93	02/03/93	01/25/93		02/22/93		02/03/93
		02/17/93	03/01/93	11/30/92	02/17/93			NA		02/07/93	03/03/93	02/16/93	03/11/93	03/22/93	02/03/93	01/27/93		03/02/93		02/03/93
Apr 1 1993	Development of Early Action BMP Plan	03/31/93	04/01/93	04/01/93	02/23/93	04/01/93		NA		03/24/91	03/24/93	03/29/93	03/31/93	03/22/93	04/12/93	03/29/93	04/05/93	04/07/93		
		04/01/93	04/01/93	04/01/93	03/23/93	04/14/93		NA		03/25/93	04/13/93	03/29/93	03/31/93	03/22/93	04/13/93	03/29/93	04/05/93	04/07/93		04/05/93
Apr 1 1993	Submittal of Signature Block	04/22/93	04/22/93	04/22/93	04/12/93	04/26/93	04/26/93	NA	NA	04/20/93	04/19/93	04/15/93	04/22/93	04/14/93	04/22/93	04/22/93	04/26/93	04/26/93		04/26/93
		04/22/93	04/22/93	04/22/93	04/12/93	04/26/93	04/26/93	NA	NA	04/20/93	04/19/93	04/15/93	04/22/93	04/14/93	04/22/93	04/22/93	04/26/93	04/26/93		04/26/93
May 1 1993	Required Authority for Regulation of Stormwater/Urban Runoff							NA												
	Stormwater Permit Implementation Agreement							NA												
								NA												
Jul 1 1993	Identification of Manhole, Catch Basin, & Stationing Info.			10/29/92				NA			10/26/92		10/29/92						10/26/92	
	Database (3 1/2" Disk) of Size & Type of Each Drain			11/30/92				NA												
	Database (3 1/2" Disk) of Connection Inventory			11/30/92				NA												

Date Received  
 Date Determined Acceptable

NA = Not Applicable (agency covered under other phase)

Attachment B

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**STATUS OF ACTIVITIES FOR PHASE II AGENCIES**  
as of May 3, 1993

Deadline	Activities	Alhambra	Arcadia	Azusa	Baldwin Park	Bradbury	Burbank	Calabasas	Caltrans	Claremont	Covina	Diamond Bar	Duarte	El Monte	Glendale	Glendora	Hidden Hills	Industry	Irwindale	La Cañada Flintridge
Sep 30 1992	Submission of Existing Rainfall Data	09/30/92	09/21/92	09/17/92	09/01/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92
	Submission of Existing Flow Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92
	Submission of Existing Water Quality Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	12/02/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92
Oct 31 1992	Alignment of Stormdrain	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		07/14/92	10/26/92	10/29/92	10/29/92	10/26/92	08/13/92	11/02/92	11/03/92			11/03/92
	Identification of Natural Drainage Watercourses	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		07/14/92	10/26/92	10/29/92	10/29/92	10/26/92	08/13/92	11/02/92	11/03/92			11/03/92
	Identification of Private Drainage Systems	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		07/14/92	10/26/92	10/29/92	11/04/92	10/26/92	09/13/92	11/01/92	11/03/92			11/03/92
	Definition of Drainage Boundaries	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		09/15/92	10/27/92	11/02/92	11/04/92	10/26/92	11/03/92	11/04/92	11/03/92			11/25/92
Nov 30 1992	Determination of Existing BMPs for Construction Sites	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		11/03/92
	Existing BMPs for Illegal Discharge & Disposal Practices	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		11/03/92
	Existing BMPs for Residential, Commercial, & Industrial	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		11/03/92
		12/01/92	12/01/92	11/30/92	12/03/92	12/01/92		NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		11/03/92
Feb 1 1993	Identification of Waste Disposal Facilities	02/01/93	01/28/93	02/03/93	08/27/92	11/02/92		NA	10/14/92	07/14/92	01/26/93	01/19/93	09/17/92	01/25/93	02/18/93	01/25/93	11/03/92	01/19/93		02/03/93
	Identification of Industries by SIC Code	02/17/93	11/02/92	11/30/92	02/17/93			NA	10/14/92	07/15/92	01/27/93	01/19/93	11/02/92	02/01/93	01/26/93	11/03/92	02/16/93			02/03/93
Apr 1 1993	Development of Early Action BMP Plan	03/31/93	04/01/93	04/01/93	02/23/93	04/01/93		NA		03/24/93	03/24/93	03/29/93	03/31/93	03/22/93	04/12/93	03/29/93	04/05/93	04/07/93		04/06/93
	Submission of Signature Block	04/22/93	04/22/93	04/22/93	04/12/93	04/26/93	04/26/93	NA	NA	04/20/93	04/19/93	04/15/93	04/22/93	04/14/93	04/22/93	04/22/93	04/26/93	04/26/93		04/26/93
May 11 1993	Required Authority for Regulation of Stormwater/Urban Runoff							NA												
	Stormwater Permit Implementation Agreement							NA												
								NA												
Jul 1 1993	Identification of Manhole, Catch Basin, & Stationing Info.			10/29/92				NA			10/26/92		10/29/92						10/28/92	
	Database (3 1/2" Disk) of Size & Type of Each Drain			11/30/92				NA												
	Database (3 1/2" Disk) of Connection Inventory			11/30/92				NA												
				11/30/92				NA												

Date Received  
 Date Determined Acceptable

NA = Not Applicable (agency covered under other phase)

Attachment B

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**STATUS OF ACTIVITIES FOR PHASE II AGENCIES**  
as of May 3, 1993

Dead lines	Activities	La Habra Heights	La Puente	La Verne	Los Angeles	Monrovia	Montebello	Monterey Park	Pasadena	Pomona	Rosemead	San Dimas	San Fernando	San Gabriel	San Marino	Sierra Madre	South El Monte	South Pasadena	Temple City	Walnut	West Covina
Sep 30 1992	Submission of Existing Rainfall Data	09/23/92	02/04/93	09/14/92	06/27/91	08/17/92	09/14/92	09/14/92	09/21/92	10/06/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	01/13/92	08/17/92	10/20/92	08/26/92	09/30/92	09/15/92
	Submission of Existing Flow Data	09/23/92	02/04/93	09/14/92	08/08/91	08/17/92	09/14/92	09/14/92	09/21/92	10/06/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	10/13/92	08/12/92	10/20/92	08/26/92	09/30/92	09/15/92
	Submission of Existing Water Quality Data	09/23/92	02/04/93	09/14/92	09/30/92	08/17/92	09/14/92	09/14/92	09/21/92	10/06/92	09/22/92	09/09/92	10/01/92	09/29/92	10/07/92	11/24/92	08/12/92	10/20/92	08/26/92	09/30/92	09/15/92
Oct 30 1992	Alignment of Stormdrain	10/29/92	02/17/93	11/23/92	10/28/92	10/26/92	10/26/92	11/02/92	11/03/92	11/16/92	11/02/92	11/25/92	07/29/92	10/28/92		12/01/92	10/19/92	11/12/92	10/29/92	11/01/92	07/28/92
	Identification of Natural Drainage Watercourses	10/29/92	02/17/93	11/23/92	10/28/92	10/26/92	10/26/92	11/02/92	11/03/92	11/16/92	11/02/92	11/25/92	07/29/92	10/28/92		12/01/92	10/19/92	11/12/92	10/29/92	11/01/92	07/28/92
	Identification of Private Drainage Systems	10/29/92	02/17/93	11/23/92	10/28/92	10/26/92	11/04/92	11/04/92	11/03/92	11/16/92	11/02/92	11/25/92	08/15/92	11/24/92		12/01/92		11/12/92	11/04/92	11/01/92	01/03/93
	Definition of Drainage Boundaries	10/29/92	02/17/93	11/23/92	10/28/92	10/26/92	10/26/92	11/02/92	11/03/92	11/16/92	11/02/92	11/25/92	10/20/92	12/03/92		04/07/93	10/19/92	11/12/92	11/16/92	11/25/92	07/28/92
Nov 30 1992	Determination of Existing EMAPs for Construction Sites	12/01/92	02/17/93	12/02/92	03/13/90	11/25/92	11/30/92	11/30/92	12/02/92	12/02/92	11/30/92	09/09/92	11/24/92	11/30/92		11/24/92	11/30/92		11/16/92	11/30/92	01/05/93
	Existing BMPs for Illegal Discharge & Disposal Practices	12/01/92	02/17/93	12/02/92	03/13/90	11/25/92	11/30/92	11/30/92	12/02/92	12/02/92	11/30/92	09/09/92	11/24/92	11/30/92		11/24/92	11/30/92		11/16/92	11/30/92	01/05/93
	Existing BMPs for Residential, Commercial, & Industrial	12/01/92	02/17/93	12/02/92	05/10/92	11/25/92	11/30/92	11/30/92	12/02/92	12/02/92	11/30/92	09/09/92	11/24/92	11/30/92		11/24/92	11/30/92		11/16/92	11/30/92	01/05/93
Feb 1 1993	Identification of Waste Disposal Facilities	09/23/92	02/04/93	12/07/92	07/03/92	02/02/93	01/27/93	02/18/93	09/21/92	02/03/93	02/03/93	09/09/92	10/01/92	01/20/93		11/24/92			10/30/92	11/30/92	09/15/92
Mar 1 1993	Identification of Industries by SIC Code	12/02/92	02/04/93	03/08/93	12/08/92	10/26/92	01/27/93	03/09/93	03/08/93	04/15/93	02/08/93	03/04/93	01/19/93	02/17/93					11/16/92	12/02/92	03/13/93
Apr 1 1993	Development of Early Action BMP Plan	03/31/93	03/31/93	03/30/93	04/05/93	04/05/93	04/07/93	04/22/93	03/23/93	04/12/93	04/05/93	04/12/93	04/01/93	03/31/93		04/06/93	04/01/93			03/31/93	03/29/93
Apr 19 1993	Submission of Signature Block	04/12/93	04/12/93	04/20/93	NA	04/22/93	04/19/93	04/22/93	04/12/93	04/22/93	04/12/93	04/21/93	04/15/93	04/21/93	04/26/93	04/26/93	04/22/93		04/26/93	04/12/93	04/12/93
May 13 1993	Required Authority for Regulation of Stormwater/Urban Runoff	04/28/93	04/28/93		06/20/91																04/28/93
	Stormwater Permit Implementation Agreement				10/19/92																04/28/93
Jul 1 1993	Identification of Manhole, Catch Basin, & Stationing Info.		04/12/93				10/26/92				11/02/92						10/19/92				
	Database (3 1/2" Disk) of Size & Type of Each Drain		04/12/93								11/03/92										
	Database (3 1/2" Disk) of Connection Inventory		04/12/93																		

Date Received  
 Date Determined Acceptable

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**STATUS OF ACTIVITIES FOR PHASE II AGENCIES**  
as of May 3, 1993

Dead Lines	Activities	Alhambra	Arcadia	Azusa	Baldwin Park	Bradbury	Burbank	Cantabasas	Caltrans	Claremont	Covina	Diamond Bar	Duarte	El Monte	Glendale	Glendora	Hidden Hills	Industry	Irwindale	LaCañada Flintridge
Sep 30 1992	Submittal of Existing Runoff Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92
	Submittal of Existing Flow Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92
	Submittal of Existing Water Quality Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	12/02/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92
		09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/06/92	NA	10/14/92	07/16/92	10/05/92	09/17/92	09/15/92	10/07/92	09/14/92	09/02/92	10/06/92	08/06/92	10/07/92	09/30/92
Oct 30 1992	Alignment of Stormdrain	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		07/14/92	10/26/92	10/29/92	10/29/92	10/26/92	08/13/92	11/02/92	11/03/92	10/28/92		11/03/92
	Identification of Natural Drainage Watercourses	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		07/14/92	10/26/92	10/29/92	10/29/92	10/26/92	08/13/92	11/02/92	11/03/92	10/28/92		11/03/92
	Identification of Private Drainage Systems	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		09/15/92	10/27/92	11/02/92	11/02/92	10/26/92	11/03/92	11/03/92	11/03/92	11/03/92		11/03/92
	Definition of Drainage Boundaries	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		07/14/92	10/26/92	10/29/92	11/04/92	10/26/92	08/13/92	11/01/92	11/03/92	11/25/92		12/11/92
		11/02/92	11/02/92	11/02/92		11/03/92		NA		09/15/92	10/27/92	11/02/92	11/04/92	10/26/92	11/03/92	11/04/92	11/03/92	11/03/92	11/25/92	
Nov 30 1992	Determination of Existing BMPs for Construction Sites	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		02/03/93
	Existing BMPs for Illegal Discharge & Disposal Practices	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		01/04/93
	Existing BMPs for Residential, Commercial, & Industrial	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92	03/03/93	NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		01/04/93
		12/01/92	12/01/92	11/30/92	12/01/92	12/01/92		NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	12/01/92	12/01/92	11/20/92	
Feb 1 1993	Identification of Waste Disposal Facilities	02/01/93	02/01/93	04/22/93	09/16/92	11/03/92		NA	10/14/92	07/14/92	01/26/93	01/19/93	09/17/92	01/25/93	02/18/93	01/25/93	11/03/92	01/19/93		02/03/93
		02/01/93	02/01/93	04/22/93	09/16/92	11/03/92		NA	10/14/92	07/16/92	01/27/93	01/19/93	11/02/92	02/01/93	02/03/93	01/25/93		02/18/93		02/03/93
Mar 1 1993	Identification of Industries by SIC Code	02/17/93	11/01/92	11/01/92	02/17/93			NA		02/08/93	03/04/93	02/18/93	03/11/93	03/22/93	02/03/93	01/25/93		02/22/93		02/03/93
		02/17/93	01/01/93	11/30/92	02/17/93			NA		02/09/93	03/06/93	02/18/93	03/11/93	03/22/93	02/03/93	01/27/93		03/02/93		02/03/93
Apr 1 1993	Development of Early Action BMP Plan	03/31/93	04/01/93	04/01/93	02/23/93	04/01/93		NA		03/24/91	03/24/93	03/29/93	03/31/93	03/22/93	04/12/93	03/29/93	04/05/93	04/07/93		04/06/93
		04/01/93	04/01/93	04/01/93	03/23/93	04/14/93		NA		03/29/93	04/13/93	03/27/93	03/31/93	04/13/93	03/29/93	04/05/93	04/07/93			04/06/93
Apr 15 1993	Submittal of Signature Block	04/22/93	04/22/93	04/22/93	04/12/93	04/26/93	04/26/93	NA	NA	04/20/93	04/19/93	04/15/93	04/22/93	04/14/93	04/22/93	04/26/93	04/26/93	04/26/93		04/26/93
		04/22/93	04/22/93	04/22/93	04/12/93	04/26/93	04/26/93	NA	NA	04/20/93	04/19/93	04/15/93	04/22/93	04/14/93	04/22/93	04/26/93	04/26/93	04/26/93		04/26/93
May 13 1993	Required Authority for Regulation of Stormwater/Urban Runoff							NA												
	Stormwater Permit Implementation Agreement							NA												
								NA												
Jul 1 1993	Identification of Manhole, Catch Basin, & Stalling Info.			10/29/92				NA			10/26/92		10/29/92						10/28/92	
	Database (3 1/2" Disk) of Size & Type of Each Drain			11/30/92				NA												
	Database (3 1/2" Disk) of Connection Inventory			11/30/92				NA												

Date Received  
 Date Determined Acceptable

NA = Not Applicable (agency completed under other phase)

Attachment B

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**1. Include Enterococcus as a monitoring parameter**

Although Enterococcus was not specifically listed as a monitoring parameter, the test method proposed for Fecal Streptococcus (Standard Methods 910A and 910B) includes the Enterococcus group. Our listed constituents exceed those required in the Federal Stormwater Monitoring Regulations.

**2a. Develop methodology to make refined estimates of pollutants discharged to Santa Monica Bay**

As a result of a meeting with your staff in September 1992, we are in the process of selecting alternate locations for some of our monitoring stations.

We will begin the process of reviewing and selecting an appropriate stormwater quality model and will attempt to develop by July 15, 1993, a methodology to estimate pollutant loads. Due to the complexity of selecting an appropriate water quality model, we may not meet your July 15, 1993 deadline. We intend to work closely with you in selecting a model appropriate for our climate and needs.

**b. Make a first estimate of pollutant loads to Santa Monica Bay on the basis of monitoring**

We feel that the October 1, 1993 completion date for this task is not appropriate. The necessary event mean concentrations for various pollutants, as determined from the analysis of flow-weighted composite samples, will not be available by this date. The flow-weighted composite samples are to be collected at our proposed monitoring stations. These stations will not collect any storm samples until the next storm season at the earliest, which begins October 15, 1993, and extends to April 15, 1994.

We request that the deadline for this task be moved to August 1, 1994. This will allow us sufficient time to obtain samples from a full storm season and develop the pollutant load estimates.

A first estimate of pollutant loads to Santa Monica Bay has already been developed for the Santa Monica Bay Restoration Project by UCLA (your monitoring reference No. 2). This study attempted to utilize existing local water quality data to develop pollutant load estimates. In general, the local data was found to be inappropriate for use in estimating pollutant loadings.

Therefore, the project relied on nationally-derived data obtained by the National Urban Runoff Pollutant study, although it was recognized that only minimal data was available from the southwest part of the country. We believe that it is inappropriate to attempt to develop a more accurate first estimate of pollutant loadings until the necessary local water quality data becomes available through our implemented monitoring program.

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**c. Complete a basic QA/QC Plan for the Stormwater Monitoring Program**

Documentation of our QA/QC procedures and the plan will be developed and submitted to you for your review prior to initiation of sampling. Completion of the plan is targeted for the July 1, 1993 deadline.

**d. Develop and implement a pilot project to establish monitoring of long-term trends in stormwater quality**

As stated earlier, we are in the process of selecting some new locations for our monitoring stations. As requested, stations are being selected to provide sufficient data to determine pollutant loads plus characterize individual land uses. However, more clarification is needed as to what would be considered "proper justification" for each station.

We will need more information as to the level of detail expected in the evaluation of trends and what statistical methodologies would be acceptable to your agency. We would like to meet with your staff to resolve these issues.

**e. Conduct monitoring for identification of sources of pollutants**

It is unclear as to how the requirements of this task differ substantially from the requirements of Tasks d. and g. The evaluation of individual land use categories and typical urban transportation corridors will be handled under Task d. Identification of specific pollutant sources would be performed under Task g.

We would like to meet with your staff to clarify these issues.

**f. Develop and implement a monitoring program to evaluate effectiveness of BMPs**

We agree that structural controls such as detention basins, clarifiers, etc, can have their effectiveness gauged through monitoring. However, determining the effectiveness of nonstructural controls, such as public education, recycling programs, increased street sweeping, etc., is very difficult to ascertain through monitoring. This is due to the variability in hydrologic factors, such as the duration, intensity, and distribution of rainfall within a watershed. The variability of these factors strongly influences the event mean concentrations calculated for a given storm in a watershed. At least a decade or more of monitoring would be needed to evaluate any trends showing a reduction in pollutants that could be attributed to a nonstructural control.

We will meet with your staff to discuss other methods to gauge the effectiveness of BMPs.

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- g. **Develop and implement a monitoring program to identify locations of illegal practices and eliminate sources of pollutants**

We will be establishing a monitoring program on behalf of the Co-Permittees. This program will involve operating the permanent and semi-permanent monitoring stations needed to develop pollutant-loading estimates, characterize individual land uses, and monitor BMP effectiveness.

Permit Task 3.1.3 requires the development of a plan to detect and eliminate illegal discharges and illicit disposal practices. The performance of any field screening/monitoring and storm drain inspections, needed for compliance with Task 3.1.3, is the responsibility of each Permittee within any storm drain it owns and operates. These activities will not be part of the monitoring program we are establishing on behalf of the Co-Permittees. Based on our available resources, we may be able to market this service to the Co-Permittees.

- h. **Develop and implement a program to evaluate stormwater impacts on selected receiving waters**

The evaluation of stormwater impacts on selected receiving waters is not a requirement of the Permit. Such analyses are, however, a part of such activities as the Santa Monica Bay Restoration Project, as well as a function of such agencies as the Regional Water Quality Control Board.

Task 3.1.2 Additional BMP Plans; Task 3.1.3 Procedures to Detect and Eliminate Illegal Discharges and Illicit Disposal Practices; and 3.1.4 Control of Surface Runoff from Construction Sites

You indicated that our submittals required revision . Thirteen recommendations were provided. Listed below are the recommendations and our comments.

1. **Establish or improve an area-wide catch basin stenciling program with a universal stencil to discourage dumping, discarding, and/or discharge of pollutants, carriers, and/or debris into storm drainage systems Countywide. A universal stencil will be most effective. The City of Los Angeles intends to develop a public service announcement with the universal stencil to be shown Countywide. This would prevent any possible confusion from seeing different stencils as one travels from municipality to municipality within the County.**

The County will develop and implement a stenciling program for catch basins owned and operated by the County. We will seek the concurrence of Co-Permittees for County basins within incorporated cities.

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Page 5

2. **Develop programs to promote, publicize and facilitate public reporting of illegal discharges and/or dumping. An (800) telephone number may be beneficial. This telephone number should be put into operation as soon as possible.**

We are currently working with the County District Attorney's Office to coordinate such a program.

3. **Adopt a runoff control ordinance requiring the use of BMPs during and after construction, such as that of the City of Santa Monica, for the reduction of runoff and pollutants leaving a property or properties.**

We have some concern regarding this recommendation. Alternatives that provide similar results may be the more appropriate approach. This may include, but not be limited to, policies and guidelines that would be incorporated in our land development regulations and programs. These requirements would enforce compliance in efforts by contractors and developers to enhance the quality of runoff and restrict pollutant discharges. Development and implementation of these requirements are critical, as it is noted that any over-restrictive runoff control ordinance will adversely impact the local economy and jeopardize needed business retention objectives. We will investigate the feasibility of implementing such requirements.

4. **Augment public education and outreach programs with regard to catch basins and storm drainage systems and their intended purpose.**

We are developing a comprehensive public education and outreach program.

5. **Provide regular catch basin cleaning when and where needed.**

We currently clean all of our catch basins once a year. Additional cleaning is done if problem areas are identified and on a complaint basis. As stated in our EABMP Plan, we will further identify target areas which may require increased frequency of cleaning and implementing an expanded cleaning program in these areas, if appropriate. We currently have two years of data on catch basin cleaning. We will continue to collect data to monitor the situation and refine our knowledge of specific trends, as needed. We do not currently foresee additional improvements in this BMP beyond those proposed in our EABMP plan.

6. **Increase cleaning frequency of and number of roadside trash receptacles in areas where needed.**

We currently provide trash receptacles in areas of high-foot traffic. They are cleaned out once a week. Additional cleanout is provided in problem areas. As stated in our EABMP Plan, we will:

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Page 6

Identify areas where roadside trash receptacles frequently overflow and provide additional capacity or more frequent collection at these locations. Receptacles will be lined with plastic bags to prevent leaking of fluids.

We do not foresee additional improvements in this BMP beyond those proposed in our EABMP plan.

7. Increase street sweeping in areas where needed.

Street sweeping of unincorporated County areas is done once a week. We believe that our practice is very effective but will be investigating additional measures as needed.

8. Discourage the improper disposal of litter, lawn/garden clippings, and pet feces into the street or areas where runoff may carry these pollutants to the storm drainage system.

We will include the above-stated concerns in our public education programs.

9. Implement facility inspections of auto repair shops, auto body shops, auto parts and accessory shops, gasoline stations, and restaurants as the accumulation of pollutants, garbage, and/or debris tends to concentrate in these areas. These inspections may effectively prevent the discharge of chemicals, materials, and/or debris into the street and/or storm drainage system.

We currently inspect, at least once per year, a variety of industrial establishments through the Industrial Waste/Underground Tank Regulatory Programs. Follow-up inspections are made if violations are identified. We are investigating the possibility of including stormwater quality in such inspections.

10. Encourage owners and persons in control of homes or businesses to remove dirt, rubbish, and debris from their sidewalks and alleys which may contribute pollutants to urban runoff.

We will include the above-stated concerns in our public education programs.

11. Encourage recycling of oil, glass, plastic, and other materials to prevent their improper disposal into the storm drainage system. Each municipality should insure that receptacles are provided in strategic areas.

We will have expanded our curbside recycling programs to include all incorporated areas by June 1994, in compliance with the State solid waste reduction programs.

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Dr. Robert P. Ghirelli  
February 8, 1993  
Page 8

We will develop a detailed Additional BMP Plan which will include scheduled implementation target dates. In addition, an update of current programs that have been implemented will be summarized for your information. We do request that, in the interest of providing a thorough document, additional time be given to the Permittees beyond the April 30, 1993 deadline. We look forward to extensive work with your staff and anticipate that such a document may be achieved by June 30, 1993.

In conclusion, we believe that the recommendations of your agency provide needed direction to the Permittees for Permit compliance. Your technical assistance and active support, as "enforcement agency," is crucial to the effective implementation of the stormwater quality management program.

We believe that, in order to effectively develop and implement the program, final recommendations for BMPs and water quality monitoring should be included as an amendment to the current Permit.

Enclosed is a letter from the City of Agoura Hills expressing their concerns regarding your recommendations.

If you have any questions, please call Rod Kubomoto at (818) 458-3537, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

T. A. TIDEMANSON  
Director of Public Works

*James A. Noyes*

JAMES A. NOYES  
Deputy Director

FK:mp  
MSWP.CMT

Enc.

cc: Phase I Co-Permittees

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

75 Hawthorne Street  
San Francisco, Ca. 94105-3901

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22 JAN 1993

CALIFORNIA REGIONAL BOARD  
QUALITY CONTROL  
LOS ANGELES REGION

53 JAN 25 PM 2:01

Dr. Robert P. Ghirelli  
Executive Officer  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Re: Los Angeles County Municipal Stormwater NPDES Permit  
(CA0061654)

Dear Dr. Ghirelli:

We have received a copy of your staff's evaluation of Los Angeles County's compliance with the second year requirements of their municipal storm water NPDES permit.

As you are aware, storm water flows can be a major source of pollution to surface waters. EPA Region 9 believes that proper implementation of the national storm water program can be a very important means for controlling pollution to surface waters in California, and we are committed to its implementation throughout the region.

With the foregoing in mind, I offer the following comments on your staff's review of L.A. County's second year performance. First, it appears that your staff has conducted a thorough review of the County's second year submittals. I am pleased to see Board staff resources dedicated to oversight of the County's storm water program. I urge the Board to continue to dedicate sufficient resources to this activity so that timely guidance to and oversight of the County's program can continue.

Second, although we have not conducted a separate review of the County's submittals, I note with concern that your staff has identified several deficiencies in the County's performance under the permit to date. I encourage you and your staff to work with the County in order to ensure that it fully complies with all requirements of the permit. I have recently assigned additional staff to the oversight of the storm water program both in California in general as well in regard to L.A. County's program specifically. We therefore stand ready to assist you and your staff in any way that we can.

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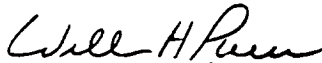
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Please call me if you have any questions, or your staff may contact Mr. Jeremy Johnstone at (415) 744-1895.

Sincerely,



William H. Pierce  
Chief, Permits and Compliance Branch  
Water Management Division

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-3156  
(713) 244-7300  
FAX: (713) 244-7400



January 11, 1993

Thomas A. Tidemanson, Director  
Department of Public Works  
County of Los Angeles  
900 S. Fremont Avenue  
Alhambra, CA 91803-1331

MUNICIPAL STORM WATER PERMIT FOR LOS ANGELES COUNTY (NPDES No. CA0061654) - REVIEW OF SECOND YEAR COMPLIANCE AND NOTICE OF WORKSHOP

We have completed our review of the following documents submitted by the Los Angeles County Department of Public Works and co-permittees as required by NPDES Permit No. CA0061654:

1. Compliance report for Year 2 requirements;
2. Storm Water Monitoring Workplan;
3. Evidence of implementation of Early Action Best Management Practices plan;
4. Additional BMPs plan
5. Evidence of Legal Authority

We are approving the proposed Storm Water Monitoring Program and Early Action Best Management Practice plans in the interest of timely implementation. Los Angeles County and co-permittees must implement the approved plans immediately.

However, you should be aware that our review of your submittals indicates that not all elements have been completed, and amendments to the plans will be necessary to meet permit requirements and the goals of a comprehensive Storm Water Management Program. Our comments and recommended modifications to these plans are indicated in the attached staff report.

Furthermore, the Additional BMPs Plan that was submitted as part of Year 2 requirements is not integrated to achieve improvement of storm water quality on an areawide basis. A revised Additional BMP plan with schedules for implementation which collectively satisfy permit Tasks 3.1.2, 3.1.3, and 3.1.4 will be necessary.

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Task 3.1.2 Submit to the Regional Board for approval a plan with schedule of implementation of Additional BMPs (ABMPs), judged appropriate for each city or drainage basin, to control pollutants from residential, commercial, and industrial sites to the maximum extent practicable.

The ABMPs plans submitted are inadequate for control of pollutants from residential, commercial, and industrial sites. Greater detail must be provided and a revised schedule for implementation must be submitted. ABMPs selected for implementation must supplement EABMPs and must control pollutants to the maximum extent practicable on an areawide basis.

Task 3.1.3 Submit for approval a plan with schedule of implementation of procedures to detect and eliminate illegal discharges and illicit disposal practices.

The plans submitted to comply with this requirement are inadequate. Some permittees have proposed only the standardization of hazardous material spill containment capabilities and response procedures to improve containment and clean-up. The standardization of containment procedures is not in itself sufficient and as such does not satisfy permit requirements. Other permittees omitted information altogether.

Task 3.1.4 Submit for approval a plan with schedule of implementation of measures to control pollutants in surface runoff from construction sites.

Board staff review of plans submitted for this requirement determined that the ABMPs for control of pollutants from construction sites are inadequate. More detail must be provided and a revised schedule for implementation must be submitted. ABMPs selected for implementation must supplement EABMPs.

One permittee responded that because all undeveloped lots in its jurisdiction are less than one tenth of an acre in size, no plan to control pollutants or sediments is necessary other than simply sand bagging. This may be true for controlling sediments or erosion but does not necessarily control waste materials generated during construction. A plan for the control of pollutants for construction sites is required regardless of size under the municipal compliance program. Construction activity may include any disturbance of soil including excavation, grading, and demolishing.





CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION  
348th Board Meeting

January 25, 1993  
Los Angeles

STAFF REPORT

ATTACHMENT 1

RECOMMENDED BEST MANAGEMENT PRACTICES

I. INTRODUCTION

The areawide municipal storm water permit was issued specifically recognizing that the storm drainage system is interconnected. Best Management Practices (BMPs) can be used effectively to address, minimize, and/or prevent the pollution of storm water runoff in all areas. Adoption and implementation of universal pollution prevention practices would be the most practical and efficient approach.

Board staff recommends that permittees within their jurisdictions implement storm water management practices that are an integral part of a comprehensive areawide storm water program. This may be achieved by incorporating a set of the same BMPs in all municipalities and a second series of BMPs specific to the characteristic of a geographic location or hydrologic area.

II. EFFECTIVE BMP PROGRAM APPROACHES

1. Cross Jurisdictional Agreements

A program of detecting and eliminating illegal connections, discharges, and disposals is essential for the overall success of the storm water program. The recent closures of Los Angeles County beaches due to high bacteria counts coming from the storm drainage system exemplify the fact that contaminants, litter, or other materials found in one municipality may originate from another area or municipality leading to jurisdictional conflicts. In order to effectively respond to such occurrences, a formal agreement must be developed by permittees similar to one being developed by the Ballona Creek Task Force.

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## 2. Construction Sites

The control of pollutants in surface runoff from construction sites is essential in preventing the flow of sediments and other waste materials and/or contaminants to the drainage system.

Municipal permittees are encouraged to adopt ordinances like those of the cities of Santa Monica and Malibu and develop enforcement strategies. These may include inspections at construction sites to insure that all practices are done in a proper and legal manner, and that problems are rectified immediately.

The State Water Resources Control Board (State Board) adopted a General Construction Storm Water Permit on August 20, 1992, which requires that a Storm Water Pollution Prevention Plan (SWPPP) be retained on site and will be made available to Regional Board or local authority representatives when requested. The SWPPP establishes procedures adopted by the site operator to prevent the pollution of storm water leaving the site, and is an important document to verify proper practices.

## 3. Industrial Sites

Municipal permittees are encouraged to develop a storm water enforcement program which at a minimum ought to include the inspection of industrial sites to insure that all pollution prevention practices are done according to the Storm Water Pollution Prevention Plan (SWPPP) as required by the State of California General Industrial Storm Water Permit adopted by the State Board November 19, 1991 and amended Sept 17, 1992 and consistent with local agency requirements.

## 4. Model Proposals

The City of Los Angeles and the City of Torrance have proposed and implemented noteworthy programs and policies which may be effective in the prevention of runoff pollution. Regional Board staff suggests that all permittees consider such programs for potential implementation.

## III. STAFF RECOMMENDED PLANS

Board staff suggests that permittees share information and discuss submittals to insure an effective areawide comprehensive program. Staff believes that specific EABMPs submitted which are regionally applicable should be implemented in all areas. ABMPs selected for implementation must supplement EABMPs.

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Board staff has determined the following BMPs constitute the minimum required for countywide application. Implementation of these BMPs would be used to gauge compliance with Year 2 BMP requirements of the permit.

1. Establish or improve an areawide catch basin stenciling program with a universal stencil to discourage dumping, discarding, and/or discharge of pollutants, carriers, and/or debris into storm drainage systems countywide. A universal stencil will be most effective. The City of Los Angeles intends to develop a public service announcement with the universal stencil to be shown countywide. This would prevent any possible confusion from seeing different stencils as one travels from municipality to municipality within the county.
2. Develop programs to promote, publicize and facilitate public reporting of illegal discharges and/or dumping. An (800) telephone number may be beneficial. This telephone number should be put into operation as soon as possible.
3. Adopt a runoff control ordinance requiring the use of BMPs during and after construction such as that of the City of Santa Monica for the reduction of runoff and pollutants leaving a property or properties.
4. Augment public education and outreach programs with regard to catch basins and storm drainage systems and their intended purpose.
5. Provide regular catch basin cleaning when and where needed.
6. Increase cleaning frequency of and number of roadside trash receptacles in areas where needed.
7. Increase street sweeping in areas where needed.
8. Discourage the improper disposal of litter, lawn/garden clippings, and pet feces into the street or areas where runoff may carry these pollutants to the storm drainage system.
9. Implement facility inspections of auto repair shops, auto body shops, auto parts and accessory shops, gasoline stations, and restaurants as the accumulation of pollutants, garbage, and/or debris tends to concentrate in these areas. These inspections may effectively prevent the discharge of chemicals, materials, and/or debris into the street and/or storm drainage system.
10. Encourage owners and persons in control of homes or businesses to remove dirt, rubbish, and debris from their sidewalks and alleys which may contribute pollutants to urban runoff.

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11. Encourage recycling of oil, glass, plastic, and other materials to prevent their improper disposal into the storm drainage system. Each municipality should insure that receptacles are provided in strategic areas.
12. Encourage the proper disposal of Household Hazardous Wastes to prevent the improper disposal of such materials to the storm drainage system. Each municipality should establish disposal centers in strategic areas.
13. Encourage the proper use and conservation of water.

Permittees should resubmit Additional BMP plans with schedules for implementation incorporating the above recommended BMPs which collectively satisfy permit tasks 3.1.2, 3.1.3, and 3.1.4, by April 30, 1993.

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION  
348th Board Meeting

January 25, 1993  
Los Angeles

STAFF REPORT

ATTACHMENT 2

REVIEW OF MONITORING WORK PLAN FOR THE SANTA MONICA BAY WATERSHED

I. SUMMARY

Board staff, in evaluating the Santa Monica Bay (SMB) Watershed monitoring work-plan, considered (1) existing storm water monitoring programs in other urban areas of the State, (2) the United States Environmental Protection Agency guidance for municipal storm water permitting, (3) recent reports by the Santa Monica Bay Restoration Project on non-point source pollution, and (4) comments received by Los Angeles County during public review of the plans.

Although the monitoring plan submitted by the County and co-permittees addresses the specific objectives required by the permit (Order No. 90-079, Section 3.1.1), it overlooked (1) the objective of the Storm Water Program which is to achieve a reduction of pollutants discharged through storm water and urban runoff to receiving waters, and (2) the essential elements of a comprehensive monitoring program. The proposed plan also lacked details on the following:

1. rationale/procedures for the selection of monitoring sites and relationship to specific objectives;
2. quality assurance/quality control procedures for field sampling, data analyses, and data management, and
3. projected time schedules to meet the various objectives.

The list of monitoring parameters submitted would be acceptable, if the biological indicator *Enterococcus* is added. The proposed monitoring frequency is satisfactory.

Board staff proposes the following revisions to the monitoring plan:

1. Include *Enterococcus* as a monitoring parameter;
2. Add the following tasks and schedule for completion;

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TASKS	COMPLETION DATE	REPORT OF COMPLIANCE TO REGIONAL BOARD
a. Develop methodology to make refined estimates of pollutants discharged to Santa Monica Bay	July 1, 1993	July 15, 1993
b. Make a first estimate of pollutant loads to Santa Monica Bay on the basis of monitoring	Oct. 1, 1993	Oct. 15, 1993
c. Complete a basic QA/QC Plan for the Storm Water Monitoring Program	July 1, 1993	July 15, 1993
d. Develop and implement a pilot project to establish monitoring of long-term trends in storm water quality	July 1, 1993	Oct. 15, 1993
e. Conduct monitoring for identification of sources of pollutants	July 1, 1993	July 15, 1993
f. Develop and implement a monitoring program to evaluate effectiveness of BMPs	Jan 1, 1994	Jan 15, 1994
g. Develop and implement a monitoring program to identify locations of illegal practices and eliminate sources of pollutants	Jan 1, 1994	Jan 15, 1994
h. Develop and implement a program to evaluate storm water impacts on selected receiving waters	July 1, 1994	July 15, 1994

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## II. EVALUATION OF THE PROPOSED MONITORING PLAN

### 1. Objectives of the Monitoring Plan

The objectives of a comprehensive Storm Water/Urban Runoff Monitoring Program must include the following:

- (a) develop a methodology to refine annual estimates of pollutant loads to Santa Monica Bay,
- (b) determine long-term trends in the quality of storm water/urban runoff,
- (c) improve the understanding of sources of storm water pollution,
- (d) establish effectiveness of controls (BMPs) for specific land uses, with implication for broader implementation,
- (e) identify illegal discharges or locations of illegal disposal practices, and
- (f) monitor effects of storm water/urban runoff on receiving water quality and water quality objectives.

The proposed monitoring plan submitted by Los Angeles County includes objectives (b) through (e), but does not address (a) and (f). Staff proposes that (a) and (f) be included.

### 2. Annual Estimates of Pollutant Loads

The proposed work-plan does not discuss this objective. The permittees in their monitoring plan proposed a pilot program of nine monitoring stations in the Santa Monica watershed to evaluate storm water quality. The permittees could modify the choice of sampling stations to include all the major drainage basins in the watershed and use this pilot project to make the first estimate of pollutant loads to Santa Monica Bay.

Annual pollutant loads and event mean concentrations (EMCs) are important parameters to assess the impact of municipal storm water discharges on receiving waters. Sampling sites to estimate pollutant loads and EMCs must include drainage basins with the largest input relative to volume and predominant land-uses. A good evaluation of the relative importance of drainage basins within the Santa Monica Bay watershed is provided in a recent draft report produced for the Santa Monica Bay Restoration Project by UCLA (2). Permittees are expected to select an appropriate mathematical model (e.g. QILLUDAS, SWMM, etc.) to refine and estimate pollutant loads. For a discussion of storm water models, refer to Modelling of Non-point Source Water Quality in Urban and Non-urban Areas, Donigan and Heber, USEPA, ERL, Athens, GA, 1991.

Development of a methodology to refine estimates of pollutant loads must be accomplished and documented no later than July 15, 1993.

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### 3. Long-Term Trends in Storm Water/Urban Runoff Quality

Permittees have proposed nine test sites for the pilot study to select fixed stations but have not justified the usefulness of these sites in terms of either pollutant loads or predominant land-uses. Almost half the number of sites are within a single basin (Ballona Creek basin), and none are located within the large Malibu Creek watershed.

The objective of any long-term monitoring is to monitor potential pollutant trends in storm water/urban runoff quality and loads. Fixed stations for such purposes must be representative of the twenty-seven basins in the SMB watershed, in terms of land-use breakdowns, rainfall patterns, and land area. The pilot study may be used to choose fixed stations to evaluate long term trends in water quality and pollutant loads. The choice of permanent stations must be properly justified and approved. Also required is a description of the statistical methodology that will be used to evaluate trends. Attention should be paid to the analysis of censored data, and the accounting of factor variability.

The pilot study to develop a monitoring program to establish long term trends in storm water quality must be initiated immediately and the objective must be accomplished no later than July 1, 1993.

### 4. Sources of Storm Water Pollutants

The permittees have discussed this objective in general but without focus or detail. No pilot or model program to develop this objective has been presented.

Identification of sources of pollutants that generate high concentrations and present the greatest risk is important to the targeting of storm water quality management programs. An effective monitoring program should evaluate sources that include, (a) priority industrial sources, (b) priority commercial/retail sources, (c) land-use categories, and (d) urban transportation corridors. Source identification should consider both water and sediment as media for pollutant transport.

This component of the Monitoring Program is part of compliance activity under permit requirement 3.1.3. (page 11 of NPDES Permit No. CA0061654) and is also required under second year permit requirements.

A detailed description of a pilot or model program to meet this objective must be submitted by July 15, 1993 and the program implemented by January 1, 1994.

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**8. Quality Assurance/Quality Control**

The work-plan does not discuss Program Quality Assurance/Quality Control and Data Management procedures.

A QA/QC Plan should address as appropriate, (a) Standard operating procedures including, field procedures, pre-sampling mobilization, sample collection procedures, chain of custody and post sampling procedures, (b) Laboratory QA/QC, including lab compositing, detection limits, holding times and, (c) Data reduction, validation, and data reporting. Also essential are Monitoring plan management, Plan schedule, Field crew training, and Health and Safety Plan. Data management, including reporting and analyses, should discuss statistical methods for analysis and reporting censored/uncensored data.

A basic QA/QC Plan for the storm water monitoring program must be submitted by July 1, 1993. Specific modifications to the basic QA/QC Plan for single projects may be addressed in supplementary submittals.

In addition, we have the following minor observations,

**i. Sampling**

- o semi-volatiles should be collected as grab-samples
- o metals should be done as both soluble and total
- o Cyanide should be done as a grab sample
- o Grab samples must be collected during the first part of the storm.
- o Flow weighting method is faulty; volume must be set by storm based on predicted runoff coefficients; bottles must be changed if storm larger than expected.
- o Minimum flow volume for dry weather analysis not reported.
- o Dry weather sampling not described as grab or 24-hr composite.

**ii. Equipment**

- o Samplers must be continuously maintained and pre-storm checked
- o Detail on sampling/flow equipment, and data storage required.
- o Number of bottles in sampler and volume available not described.
- o Equipment housing procedures must be presented.

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## 9. References

The following section lists references used by Board staff in its review of the monitoring plan and are sources that permittees may find useful in addressing our comments.

### MONITORING

1. Guidance Manual for the Preparation of Part 2 of the NPDES Permit Application for Discharges from Municipal Separate Storm Sewer Systems, 1992, EPA 833-B-92-002, USEPA OWEC [Contact EPA Hotline at (703)821-4823]
2. Assessment of Non-point Sources of Contaminants to Santa Monica Bay, Santa Monica Bay Restoration Project. 1992. [Contact Guang-yu Wang, SMERP, (213)266-7568], (UCLA and WCC)
3. NPDES Storm Water Sampling Guidance Document, USEPA 1992, EPA 833-B-92-001, [Contact EPA Hotline at (703)821-4823]
4. Amended Monitoring Plan, Santa Clara Valley Non-point Source Pollution Control Program, December 9, 1991. [Contact Marcia Guzetta at (408)265-2600, (WCC)].
5. Guidelines for Monitoring of Urban Runoff Quality, MERL, OH, EPA-600/2-83-124, 1983, prepared for Urban Drainage and Flood Control District, Denver, CO., (Michael B. Sonnen) [Contact NTIS at (703) 487-4650] .
6. Analyzing Urban Runoff in the Dallas-Fort Worth Area, M.A. Collins et al.(undated) (WCC). [Contact WCC at (800) 776-3296]
7. Source Identification and Control Report, 1992. Santa Clara Valley Non-point Source Pollution Control Program. [Contact Marcia Guzetta at (408)265-2600, (WCC)]

### RECEIVING WATER

8. Annual Report, 1990/1991 Monitoring Program NPDES Permit 90-158, Sacramento County Water Agency, July 1, 1991. [Contact Donna Dean, County of Sacramento, (916) 440-6851] (Brown and Caldwell).
9. Annual Report, 1991/1992 Monitoring Program NPDES Permit 90-158, Sacramento County Water Agency, July 1, 1991. [Contact Donna Dean, County of Sacramento, (916)440-6851] (Brown and Caldwell)
10. Sediment Quality and Aquatic Life Assessment, W.J. Adams et al. 1992, Environ. Sc. Technol., Vol 26(10), pp 1865-1875.
11. Sediment Toxicity Testing, G.A. Burton and J. Scott, 1992, Environ. Sc. Technol., Vol 26(11), pp 2068-2075.

DATA MANAGEMENT

12. UNCENSOR: A Program to Estimate Means and Standard Deviations for Data Sets with Below Detection Limit, M.C. Newman and P.M. Dixon, 1990, American Environmental Laboratory, April 1990, pp 26-30.
13. UNCENSOR Version 3.0, Newman, M. et al. 1992. [Contact Michael Newman, Savannah River Ecology Laboratory (803) 725-2472], (University of Georgia).
14. MDL Program, D.R. Helsel 1992, Water Resources Div., USGS, [Contact USGS at (703) 860-6000]
15. Less than Obvious: Statistical Treatment of Data below the Detection Limit, D.R. Helsel, 1990, Environ. Sci. Technol., Vol. 24(12), pp 1766-1774.
16. Modelling of Non-point Source Water Quality in Urban and Non-urban Areas, Donigan and Heber, 1991, USEPA, ERL, Athens, GA, [Contact USEPA, ERL at (706) 546-3549].
17. Estimation of Descriptive Statistics for Multiply Censored Water Quality Data, D.R. Helsel and T.A. Cohn, 1988, Water Resources Research Vol. 24(12) 1997-2004.
18. The Detection Limit, P.S. Porter et al., 1988, Environ. Sci. Technol. Vol. 22(8), pp 856-861.

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# FINAL DRAFT

## BALLONA CREEK CLEANUP TASK FORCE BEST MANAGEMENT PRACTICES (BMPs) WORKING GROUP

The BMPs working group focused on identifying BMPs that would reduce the pollution sources resulting in beach closures.

As required by the Municipal National Pollutant Discharge Elimination System (NPDES) Permit issued for Los Angeles County, the Permittees have submitted a plan of BMPs to the Regional Water Quality Control Board (RWQCB).

Upon reviewing the BMP plan submitted to the RWQCB, we recommend the following BMPs for priority implementation. These are BMPs that could be implemented quickly upon their approval by the RWQCB. The BMPs are organized into the following three areas:

### I. PUBLIC EDUCATION

These BMPs will be used to enhance the general awareness of the storm drain system, the importance of stormwater quality, and the need to reduce pollutants in urban runoff among the practicing professionals, elected and appointed officials, and the general public.

#### a. In-House Training

Conduct in-house training sessions for municipal field personnel to report any illegal dumping and practices which may adversely impact the quality of stormwater.

#### b. Literature and Brochures

Increase the availability of literature and brochures concerning stormwater quality issues to the general public at public counters and special events. A number of agencies have already produced or have under production brochures discussing nonpoint source pollution and stormwater quality. These brochures should be made as readily available to the public as possible.

#### c. Signing of Open Channels

Posting of "no dumping" signs along open channel drains. There are a number of open channel storm drains within the Ballona Creek watershed. These channels are the recipients of much debris and trash from illegal dumping. Posting of signs along these open channels indicating that dumping is illegal and that this facility drains to the ocean should reduce the amount of trash and debris in the storm drains.

### II. ELIMINATION OF ILLEGAL CONNECTIONS/DISCHARGES

These BMPs will be used to stop or reduce non-stormwater and other non-NPDES permitted discharges into the storm drain system.

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a. Storm Drain Inspections

Inspections of storm drain systems to identify illegal connections to the system. The use of enforcement action, if needed, to require the termination of these illegal connections. A program involving a combination of underground inspections and field screening will be implemented to locate illegal connections and discharges to the storm drain system.

A field observation study for the open channel portion of Ballona Creek has been conducted by the City of Los Angeles. The Los Angeles County Department of Public Works (LACDPW) has begun a connection identification program for its storm drain system. It has also conducted a field inspection of connections in the open channel portion of Ballona Creek and is in the process of verifying documented discharges. However, due to the vast size of the storm drain network, a complete inspection of the Ballona Creek Watershed system will take at least five years.

b. Review of Legal Authority

As part of our NPDES Permit requirements, each Co-Permittee will be reviewing its existing legal authorities and propose new ordinances/codes as needed to insure adequate legal authority to prosecute illegal dischargers.

c. Recycling and Household Hazardous Waste Roundups

The Municipalities and the County presently operate recycling programs and hazardous waste roundups to encourage the appropriate disposal of such materials. The municipalities and the County will continue to implement and expand their programs, where possible, in these areas.

d. Hotline for the Public to Report Illegal Dumping to the Storm Drain System

An 800 hotline number is being developed to allow the public to report illegal dumping/discharge incidents. This will allow for a more swift response and possible apprehension of individuals involved in illegal dumping activities.

III. ENHANCEMENT OF STORM DRAIN MAINTENANCE

a. Floating Trash and Debris Collection

Floating trash and debris is carried through the storm drains into Ballona Creek and ultimately discharged into harbor and beach areas. In addition to being unsightly, this trash and debris can also contribute to the high bacteria levels found in storm drain discharges.

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Page 3

To reduce this problem, the LACDPW is investigating the feasibility of installing a debris collection device in the Ballona Creek channel. This device would collect the debris and trash from the year round dry weather flows from within the creek. If found feasible, such a device could be installed as early as Spring 1993.

b. Catch Basin Cleaning

All municipalities within the Ballona Creek watershed currently clean out their catch basins at least once per year prior to onset of the rainy season. Each municipality will collect data concerning the debris collected by their catch basins. This data will be used in an evaluation by each municipality to determine the cost effectiveness of increasing the frequency of catch basin cleaning.

c. Open Channel Cleaning

Currently, the open channel storm drains operated by the LACDPW are cleaned annually prior to the rainy season. The channels will be inspected after storms for debris build-up and cleaned as needed.

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THOMAS A. TIDEMANSON, Director

COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

JG 6948

XS

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

January 5, 1993

Dr. Robert P. Ghirelli  
Executive Officer  
California Regional Water  
Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

IN REPLY PLEASE  
REFER TO FILE

MM-3  
FORWARD TO  
QUALITY CONTROL BOARD  
LOS ANGELES REGION  
93 JAN -6 PM 4:27

RECEIVED

Dear Dr. Ghirelli:

**NPDES PERMIT NO. CA0061654 (CI6948)  
QUARTERLY PROGRESS REPORT**

The following report is submitted in compliance with the above-captioned Permit, which was issued on June 18, 1990. This report provides a summary on the status of specific Permit tasks performed during the second quarter (October 1, 1992, through December 31, 1992) of the third year of the Permit which began on July 1, 1990.

Phase I (Santa Monica Bay Drainage Basin)

During this period, the Principal Permittee continued to organize and chair the monthly Co-Permittee meetings to coordinate Permit compliance. Enclosed is a chart summarizing the attendance record of the Co-Permittees (Attachment A). The terms of the Permit Implementation Agreement (Task 3.3) were finalized. Twenty of the 22 Phase I Permittees have signed the Agreement.

The Permittees are still waiting for formal approval from your agency of our Early Action Best Management Practices (BMPs) Plan (Task 2.1.8); Stormwater/Urban Runoff Monitoring Program (Task 2.1.9); and Additional BMPs Plan (Tasks 3.1, 3.1.2, 3.1.3, and 3.1.4). Upon receiving approval from your agency, implementation of these programs will commence.

Enclosed for your information is an updated version of the Santa Monica Bay Drainage Basin drainage area subdivision map. The map now incorporates information on the location of all County-owned storm drains and major natural watercourses. We are also enclosing an updated version of our listing of industries by SIC code category by drainage area for your use (Attachment B). This update rectifies the earlier problem of our database system not being able to distinguish between multiple industries at the same location.

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Dr. Robert P. Ghirelli  
January 5, 1993  
Page 2

The Permittees are in the process of developing a list of common non-stormwater discharges which flow into the drain system. As part of this effort, recommendations are being developed for the handling of these discharges. We anticipate submitting this list for review and approval by your Board in early 1993.

The Los Angeles County Department of Public Works is continuing its effort in the inspection of the Pico-Kenter drainage system and Ballona Creek for illegal connections and/or illicit discharges.

Phase II (Upper Los Angeles River and Upper San Gabriel River Drainage Basins)

During this period, the Principal Permittee has organized and chaired monthly Co-Permittee meetings to coordinate Permit compliance. Enclosed is a chart (Attachment C) summarizing the Permit submittal compliance record of each Co-Permittee. Also enclosed (Attachment D) is a chart reflecting the attendance record of the Co-Permittees. We have also enclosed a copy of the "Existing Best Management Practices" (Attachment E) submitted by the Permittees, as required by Tasks 2.1.5, 2.1.6, and 2.1.7 of the Permit.


Phase III (Lower Los Angeles River, Lower San Gabriel River, and Santa Clara Drainage Basins)

During this period, the Principal Permittee conducted a second Permit orientation meeting for the Phase III agencies. Enclosed is a copy (Attachment F) of the first year Permit submittal instructions and deadlines and a sample "Letter of Intent" (Attachment G) which has been made available to Phase III Co-Permittees.

If you have any questions, please contact Rod Kubomoto at (818) 458-3537, Monday through Thursday, 7:00 a.m. to 5:00 p.m.

Very truly yours,

T. A. TIDEMANSON  
Director of Public Works

  
DAVE YAMAHARA  
Assistant Deputy Director  
Waste Management Division

FK:mp  
WM-3/FYRS

Enc.

cc: Phase I Co-Permittees  
Phase II Co-Permittees

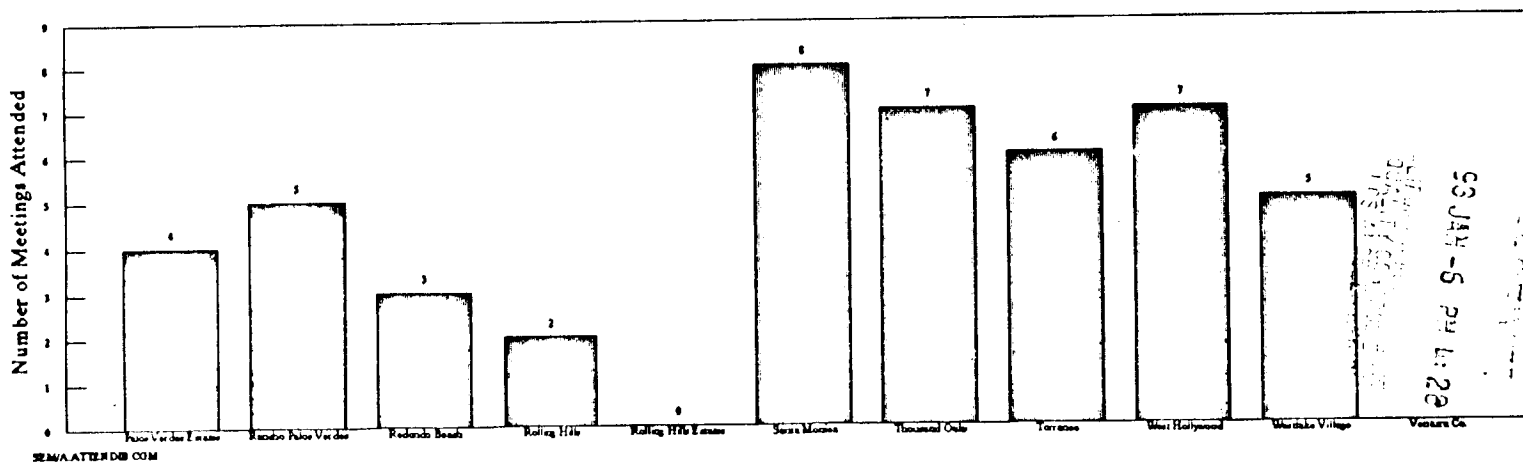
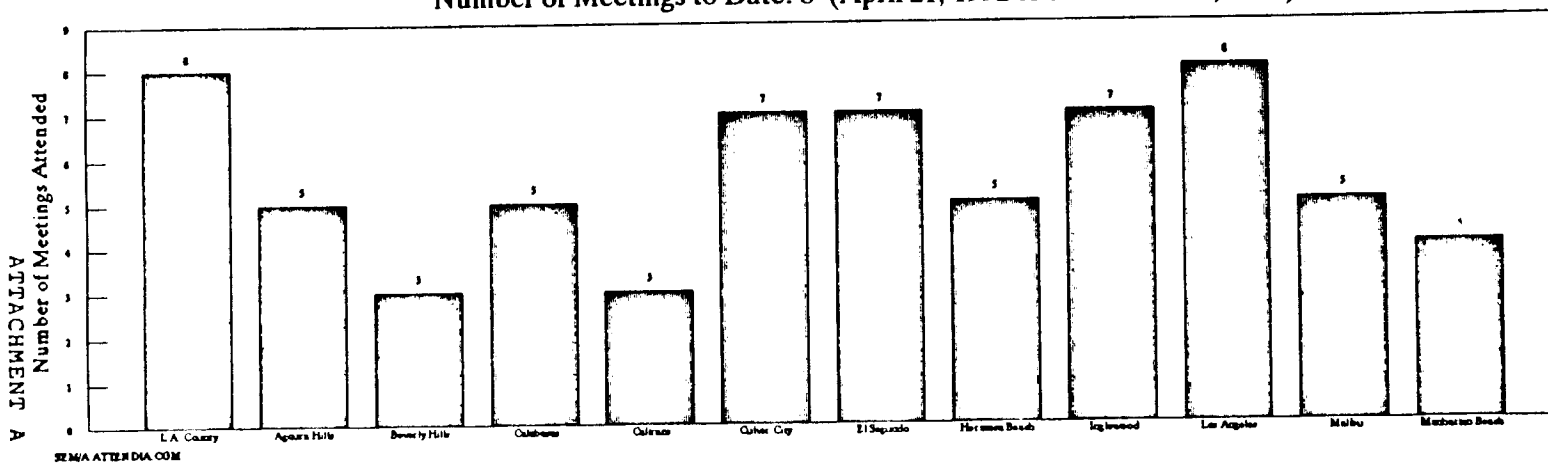
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# Phase I Agencies MONTHLY PERMITTEE MEETING ATTENDANCE

Number of Meetings to Date: 8 (April 21, 1992 to November 17, 1992)



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**STATUS OF ACTIVITIES FOR PHASE II CITIES**  
as of: 01/05/93

Date	Activities	CITIES																		
		Alhambra	Arcadia	Azusa	Baldwin Park	Bradbury	Burbank	Calabasas	Caltrans	Clermont	Covina	Diamond Bar	Diarte	El Monte	Glendale	Glendora	Hidden Hills	Industry	Irwindale	La Cañada Flintridge
Sep 30 1992	Submission of Existing Rainfall Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92
	Submission of Existing Flow Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	10/06/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92
	Submission of Existing Water Quality Data	09/30/92	09/21/92	09/17/92	09/03/92	10/07/92	12/02/92	NA	10/14/92	07/14/92	10/01/92	09/16/92	09/15/92	10/07/92	09/09/92	08/27/92	10/06/92	07/30/92	10/07/92	09/30/92
	Alignment of Storm Drain	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		07/14/92	10/26/92	10/29/92	10/29/92	10/26/92	08/13/92	11/02/92	11/03/92	10/28/92		11/03/92
	Identification of Natural Drainage Water Courses	11/01/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		07/14/92	10/26/92	10/29/92	10/29/92	10/26/92	08/13/92	11/02/92	11/03/92	10/28/92		11/03/92
Nov 30 1992	Identification of Private Drainage Systems	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		07/14/92	10/26/92	10/29/92	11/04/92	10/26/92	08/13/92	11/01/92	11/03/92	11/25/92		12/01/92
	Determination of Drainage Boundaries	10/30/92	11/02/92	10/29/92	08/27/92	11/01/92		NA		10/29/92	10/26/92	10/29/92	11/03/92	10/26/92	08/13/92	11/02/92	11/03/92	10/28/92		11/03/92
	Determination of Existing BMP's for Construction Site	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92		NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		
	Existing BMP's for Illegal Discharge & Disposal Practices	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92		NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		01/04/93
	Existing BMP's for Residential, Commercial & Industrial	11/30/92	11/30/92	11/30/92	12/02/92	11/30/92		NA		09/02/92	11/30/92	12/01/92	11/17/92	11/30/92	11/30/92	11/30/92	11/30/92	11/25/92		01/04/93
Feb 1 1993	Identification of Waste Disposal Facilities				08/27/92	11/02/92		NA	10/14/92	07/14/92			09/17/92							11/03/92
March 1 1993	Identification of Industries by SIC Code		11/02/92	11/30/92				NA	10/14/92	07/16/92			11/02/92							11/03/92
April 1 1993	Development of Early Action BMP Plan							NA												
May 31 1993	Required Authority for Regulation of Stormwater Urban Runoff							NA												
	Stormwater Permit Implementation Agreement							NA												
July 1 1993	Identification of Manhole, C.B. Stationing Info			10/29/92				NA			10/26/92		10/29/92							10/28/92
	Database (3 1/2" Disk) of Size & Type of each Drain			11/30/92				NA												
	Database (3 1/2" Disk) of Connection Inventory			11/30/92				NA												

Date Received  
 Date Determined Acceptable

NA = Not Applicable  
 (Agency covered under other phases)

ATTACHMENT C

R0033186

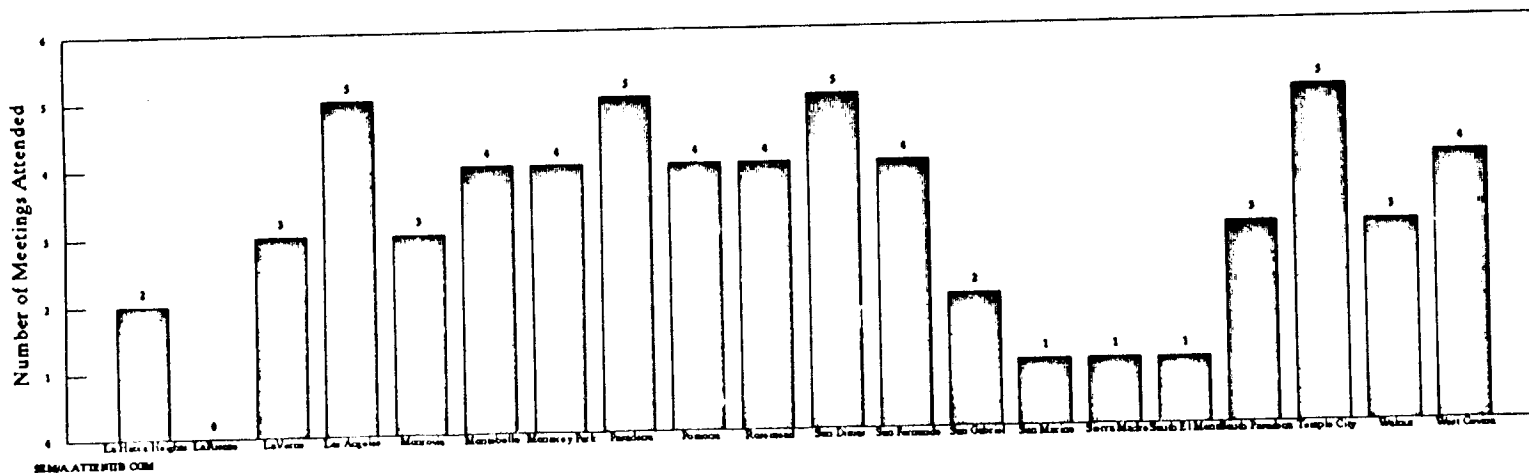
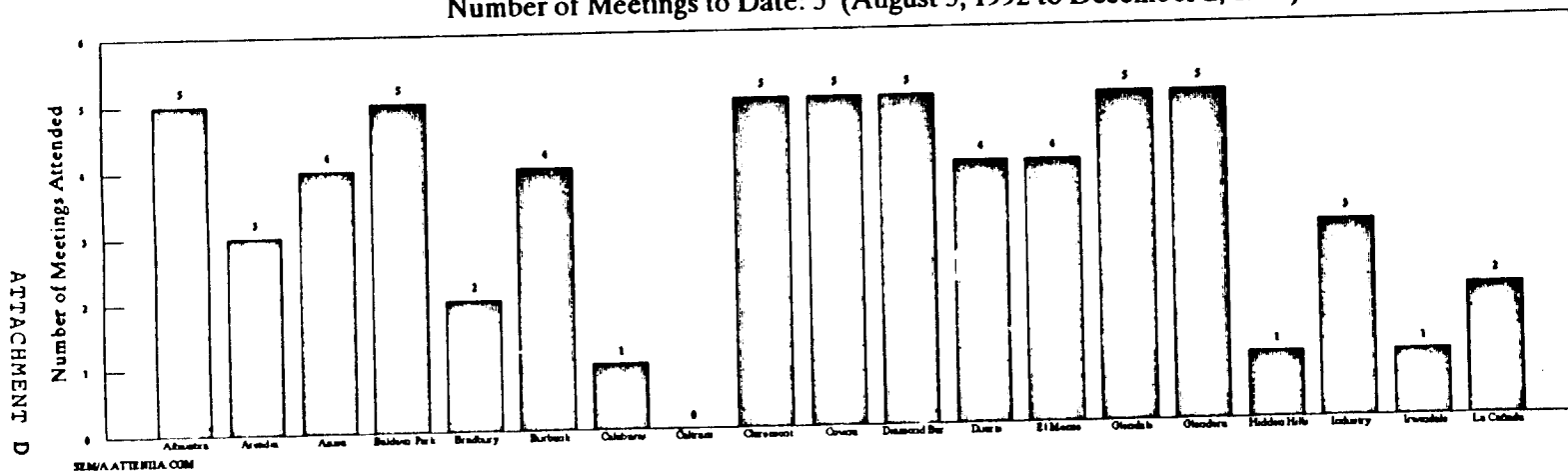
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# Phase II Agencies MONTHLY PERMITTEE MEETING ATTENDANCE

Number of Meetings to Date: 5 (August 5, 1992 to December 2, 1992)



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VOL

S A M P L E

Mr. T. A. Tidemanson  
Director of Public Works  
County of Los Angeles  
P. O. Box 1460  
Alhambra, CA 91802-1460

Attention: Mr. James A. Noyes

Dear Mr. Tidemanson

LETTER OF INTENT OF PARTICIPATE AS CO-PERMITTEE IN  
NPDES PERMIT NO. CA0061654 - CI6948

This letter will serve as our Letter of Intent to participate as a Co-Permittee in NPDES Permit No. CA0061654. The City Council at its meeting on \_\_\_\_\_ has approved the motion to participate as a Co-Permittee. City engineering staff has been directed to work with Los Angeles County staff in meeting the Permit requirements.

Further correspondence concerning the Permit should be addressed to \_\_\_\_\_.

Sincerely,

FK:mp/LOI

cc: Regional Water Quality Control Board - Los Angeles Region

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QUALITY CONTROL BOARD  
LOS ANGELES REGION

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