

CITY OF SIGNAL HILL

2175 Cherry Avenue ♦ Signal Hill, CA 90755-3799

January 10, 2014

Via E-mail

Ivar Ridgeway
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90023

RB4-LBMS4February2014@waterboards.ca.gov

Subject: Tentative Waste Discharge Requirements for Municipal Separate Storm Sewer System Discharges from the City of Long Beach (MS4 Permit)

Dear Mr. Ridgeway:

I am writing on behalf of the City of Signal Hill to provide comments on the tentative MS4 Permit for the City of Long Beach. Thank you for the extension of the comment period, which gave us a little more time to review the tentative permit and prepare the following comments. We appreciate the opportunity to comment on the draft permit.

The City of Signal Hill is vitally interested in the MS4 Permit for the City of Long Beach - both because our city is surrounded by Long Beach, and because we have been working collaboratively with the City of Long Beach in the two watersheds into which our city is divided – the Los Angeles River Watershed and the Los Cerritos Channel Watershed. Our City is working with the City of Long Beach to address metals TMDLs in the two watersheds. In the Los Angeles River Watershed, we began working with the City of Long Beach, six other cities, and Caltrans in 2009 to complete the Metals TMDL Implementation Plan for Reach 1 of the Los Angeles River and Compton Creek. This effort was coordinated through Memoranda of Understanding with the Gateway Cities Council of Governments. In the Los Cerritos Channel Watershed, we began working with the City of Long Beach and the other agencies in this watershed in late 2008 in response to a draft TMDL circulated by USEPA. The cities in the watershed formalized their long-term relationship in 2010 through Memoranda of Understanding with the Gateway Water Management Authority.

The two watershed groups have now reorganized through new Memoranda of Understanding with the Gateway Water Management Authority to prepare Watershed Management Programs (WMPs)

and Coordinated Integrated Monitoring Programs (CIMPs) for the Lower Los Angeles River Subwatershed and the Los Cerritos Channel Watershed. The City of Long Beach voluntarily submitted Notices of Intent to participate with Signal Hill and other cities regulated by Order No. R4-2012-0175 several months before the tentative order for this new permit was released for public review. Since we have begun our work on joint WMPs and CIMPs, we appreciate that the Board has based the Long Beach Permit on the Los Angeles Permit, and it appears that the new Long Beach Permit is consistent with work we have already begun. We particularly appreciate that the Board has coordinated submission dates for WMPs and CIMPs between the two permits. The Long Beach Permit gives the City of Long Beach the option of collaborating with other Permittees on the development of WMPs or developing an individual WMP, and Long Beach has chosen to continue collaborating with other Permittees to complete WMPs in three Watersheds. This approach will result in improved coordination within the watersheds, and is the most cost-effective way to address watershed management planning.

One important element of the draft Long Beach MS4 Permit is that it provides an individual permit for the City of Long Beach that is consistent with the Los Angeles MS4 Permit while accommodating the unique setting of Long Beach between the mouths of the two major rivers in the County. It appears that modifying the Los Angeles MS4 Permit to fit the requirements for an individual permit for Long Beach did not place an undue burden on the Regional Water Board nor its staff. In fact, the Long Beach Permit demonstrates that the Regional Water Board has the option of issuing individual permits, and it could serve as a model for other future individual permits.

As demonstrated to the Regional Water Board during a presentation on June 7, 2012 by Steve Myrter, Public Works Director for the City of Signal Hill, our City is also a unique community, being the headwaters for discharges to two watersheds and discharging entirely through another community to receiving waters (See attached Power Point presentation). Our City has also demonstrated leadership in addressing local water quality problems and in organizing others to address watershed and regional water quality challenges. We therefore anticipate that the City of Signal Hill will eventually have its own permit and are ready to prepare a new Report of Water Discharge (ROWD) based on the assumption that we will receive a permit similar to the Los Angeles Permit and the permit that is adopted for the City of Long Beach.

During development of the Los Angeles MS4 Permit, we questioned why municipalities that are willing to bear the extra costs of having their own permits are not allowed to do so. Without a Principal Permittee, it appears that each municipality will have to submit its own Annual Report. Therefore, an annual report for a municipality with its own permit will not put an extra burden on Regional Water Board staff, especially if the separate permits contain the same basic requirements as the area-wide permit. This new Long Beach Permit that was clearly adapted from the Los Angeles Permit encourages us.

Mr. Ivar Ridgeway
City of Signal Hill Comments on November 2013 Draft Long Beach MS4 Permit
10 January 2014
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The City has requested on numerous occasions that the Board issue an individual permit to the City of Signal Hill. The City would prefer to be responsible for its own actions or inactions, and not those of other jurisdictions. It will continue to participate in watershed activities through current and future MOAs, and is willing to implement a comprehensive monitoring program to measure the effectiveness of its water quality improvement efforts.

We also will continue to work with the City of Long Beach, which was originally granted a separate permit in 1999. Specifically, we will continue to work with the City of Long Beach on implementation of the Los Angeles River Metals TMDLs, the Los Angeles River Bacteria TMDL, the Los Angeles River Estuary Bacteria TMDL, the Los Cerritos Channel Metals TMDLs, and the Harbor Toxics TMDLs.

One issue we do have with the Tentative Long Beach MS4 Permit is that it contains essentially the same Receiving Water Limitations language as the new Los Angeles MS4 Permit. With the exception of the area covered and section references, the language in the draft permit is virtually identical to the Receiving Water Limitation language in the 2001 Los Angeles MS4 Permit that the United States Court of Appeals for the Ninth Circuit interpreted differently than the State Water Board has since Order 99-05 was adopted on June 17, 1999. In this precedential order, the State Water Board substituted Receiving Water Limitation language used by EPA in two EPA-issued permits for language that the State Water Board had included in Order 98-01, to which EPA objected when the language was used in permits issued by the San Francisco Bay and San Diego Regional Water Boards.

This draft Permit and the new Los Angeles Permit are both inconsistent with Order 99-05 in that the iterative process is only included in the Receiving Water Limitations part of the Permit, instead of being included in both the Discharge Prohibition and the Receiving Water Limitations parts of the Permit. We appreciate that this issue is now before the State Water Board and hope that it can be resolved soon. Therefore, we encourage the Regional Water Board to work with the State Water Board to consider ways to strengthen the iterative process mandated by Order 99-05.

Thank you again for the opportunity to provide these comments. The City of Signal Hill looks forward to continuing to work with the Regional Water Board to improve water quality in our region.

Sincerely,
CITY OF SIGNAL HILL


Kenneth C. Farfsing,
City Manager

Attachment

City of Signal Hill

Stormwater Quality Program





Presentation Outline

- Storm water quality program addresses Signal Hill's unique characteristics
- Proactive implementation of MS4 and TMDL requirements
- Regional leadership in addressing storm water quality
- City's FY 2012-13 proposed Environmental Programs budget



Signal Hill's Unique Geographic Characteristics

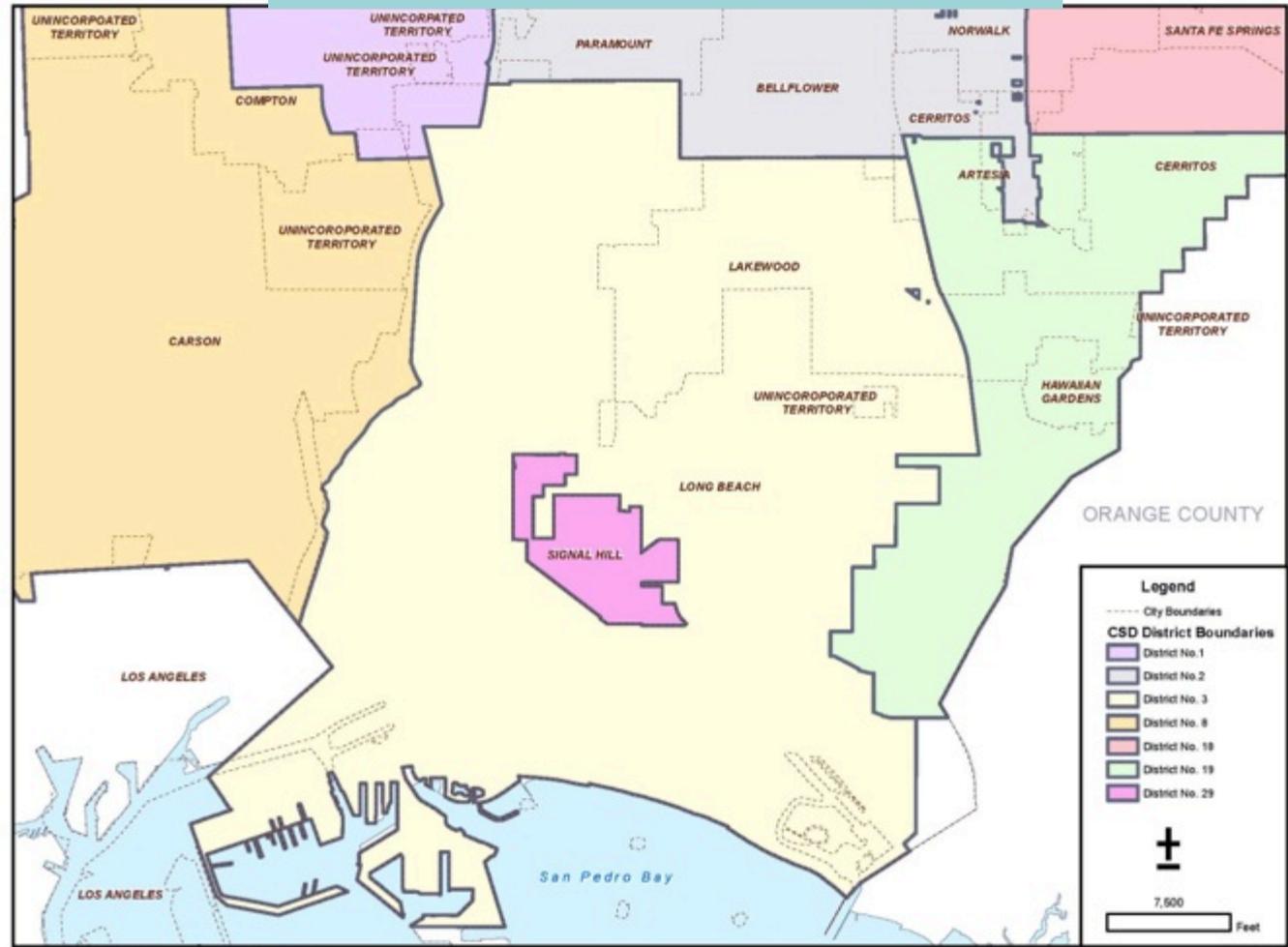
- Population of 11,072
- 2.1 square miles in size
- Surrounded by City of Long Beach
- Unique geology due to Newport Inglewood Fault
- Surface drainage to 2 Watersheds
- 85 years of oil exploration/production
- Oil production continues with over 1 million barrels pumped annually





Signal Hill's Unique Geographic Characteristics

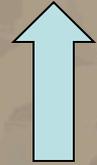
LACSD Boundary Map



- LA County Sanitation Districts is a county-wide system that serves 77 municipalities
- LACSD services Signal Hill as a stand alone District District No. 29
- District Boundary that of City Boundary

City Topography Map

City elevation range: 25 ft to 367 ft



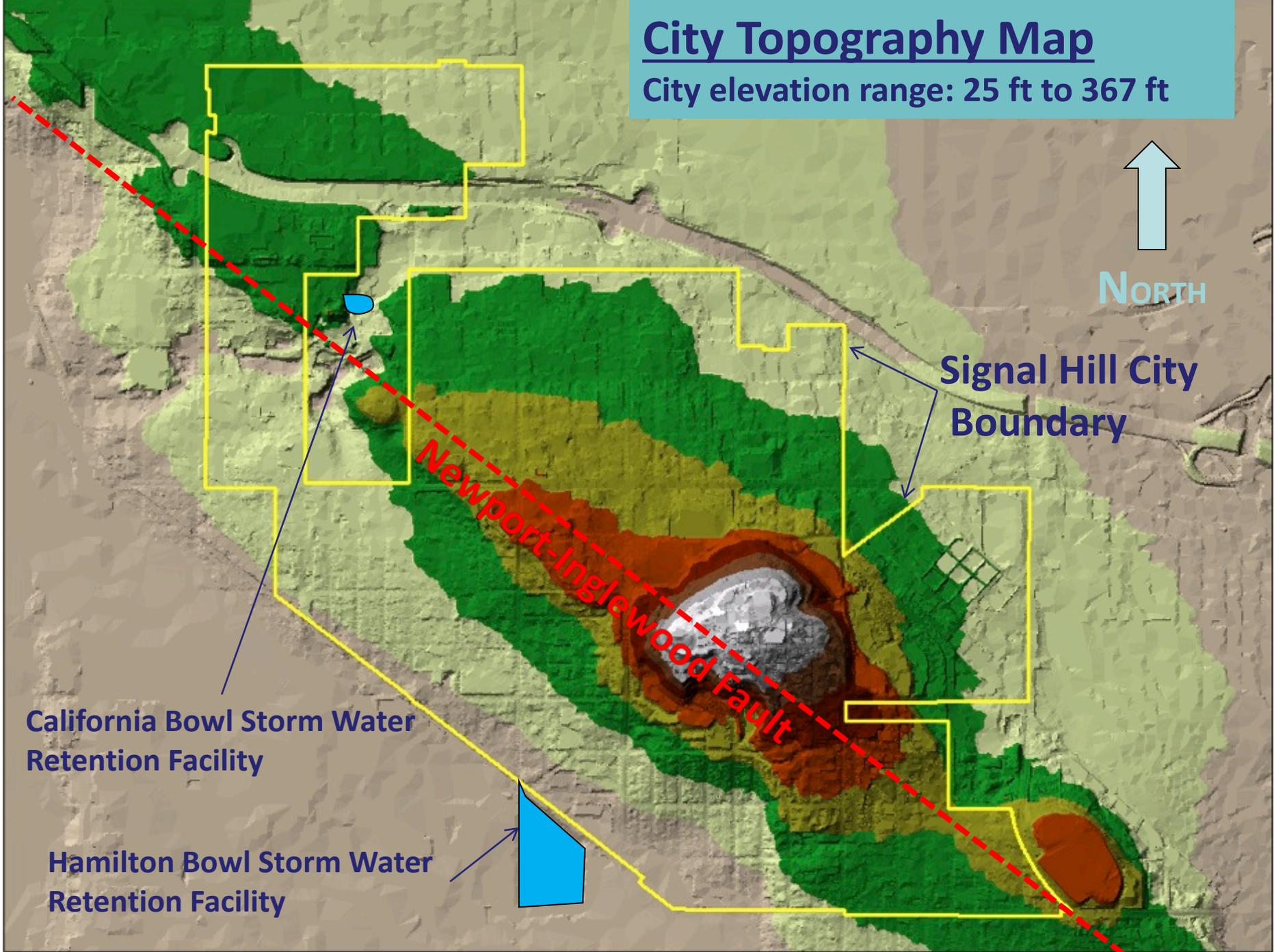
NORTH

Signal Hill City
Boundary

Newport-Inglewood Fault

California Bowl Storm Water
Retention Facility

Hamilton Bowl Storm Water
Retention Facility





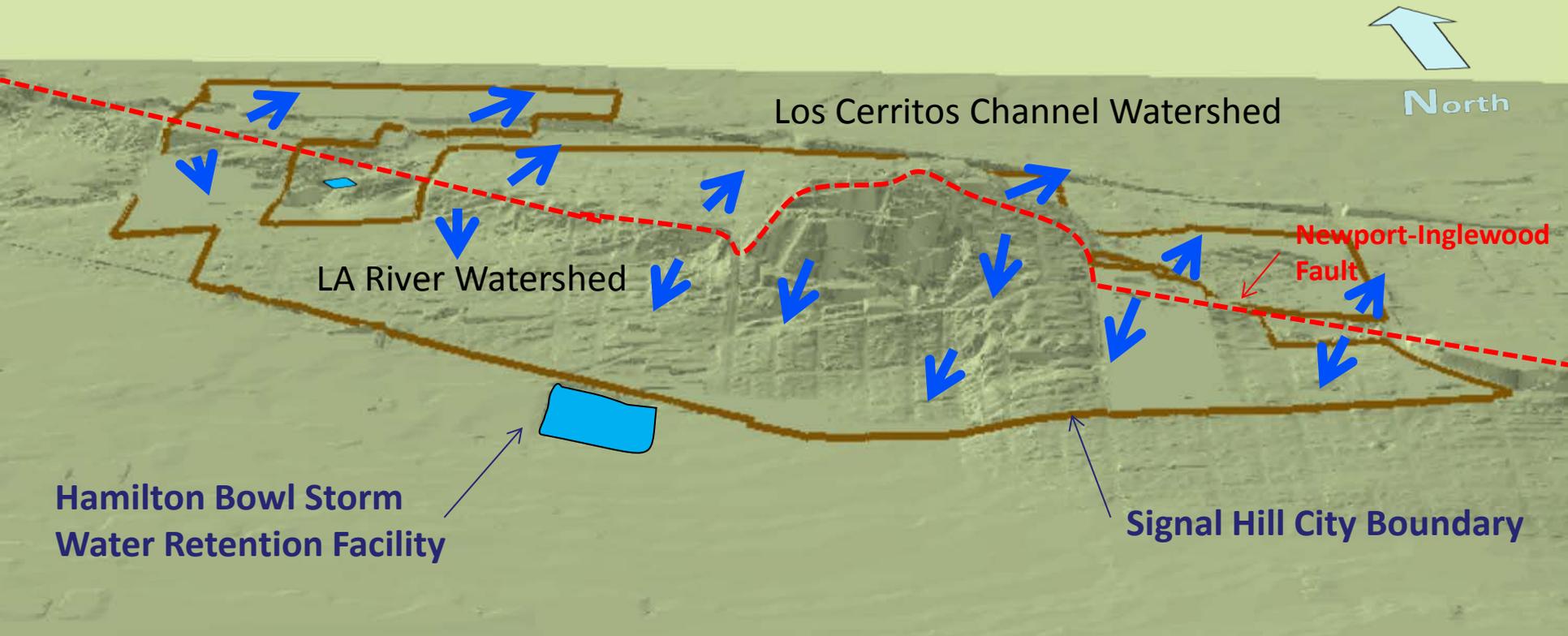
Hamilton Bowl Storm Water Retention Facility





Signal Hill's Unique Geographic Characteristics

City Surface Water Drainage / Watersheds





City's Oil Production Legacy

- Discovery of oil in 1921 ushered in several decades of heavy industry, including oil well drilling, oil sumps, pipeline construction, tank farms and refineries
- Oil fields covers 75% of the community
- Decades of oil production left a legacy of soil contamination, 1,700 abandoned wells, including numerous leaking wells

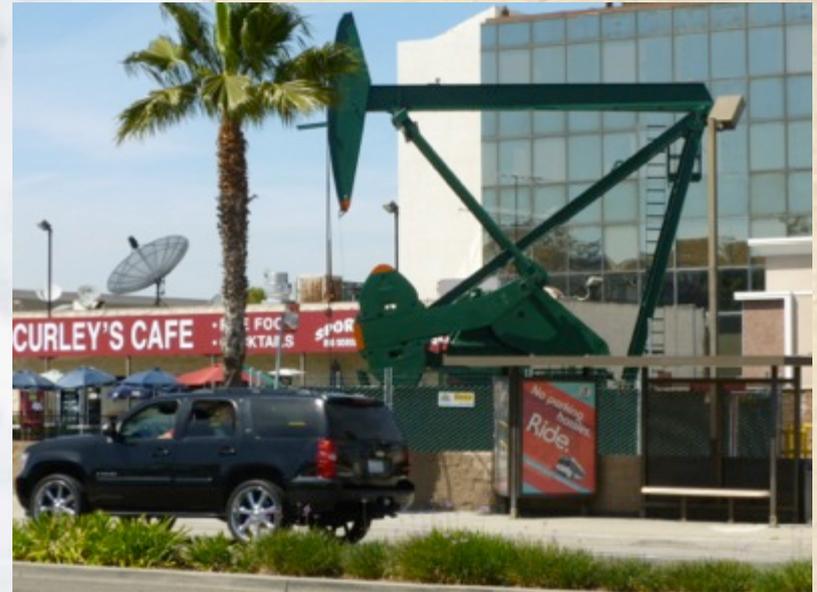


Late 1920's



City's Oil Production Legacy

Current Oil Production

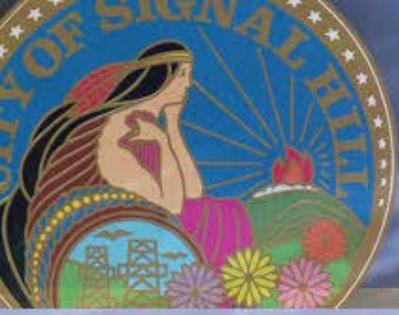


- Redevelopment Agency formed in 1974 to deal with oil production legacy issues
- Since 1989 the Agency has invested \$15 million in soil remediation, ground water clean-up and 92 well re-abandonments
- Over 600 active and reserve wells; 1 million barrels of production annually

City of Signal Hill

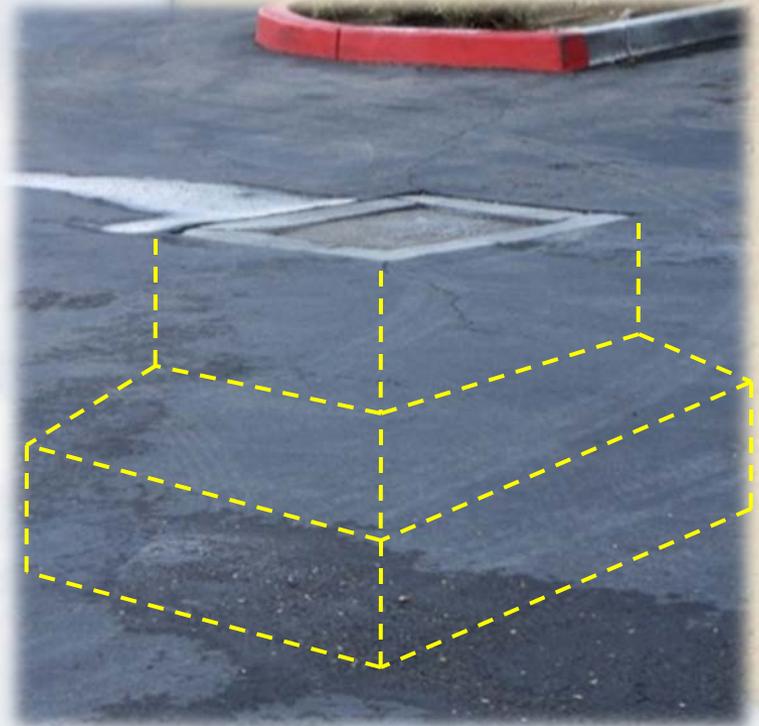


Proactive Implementation of MS4 and TMDL
Requirements



Stormwater Treatment

Residential



Infiltration System
Las Brisas Affordable Housing
California St, 2004



Stormwater Treatment

Industrial

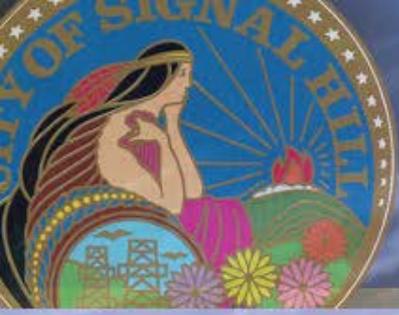
A&A Concrete – Patterson St, 2007



Infiltration Basin Perimeter



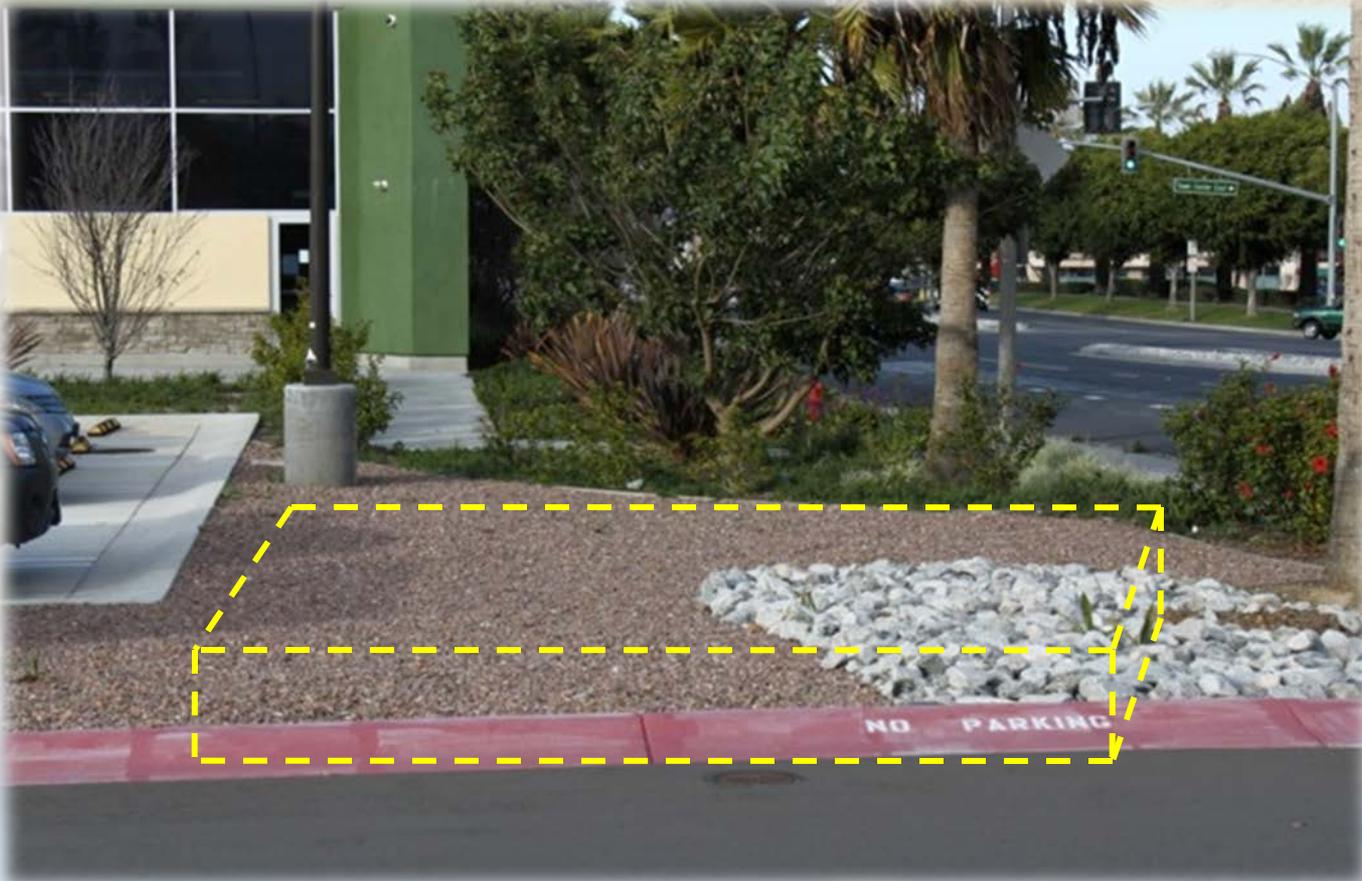
Infiltration Trench



Stormwater Treatment

Commercial

Fresh & Easy - Cherry Ave, 2009



Underground infiltration system



Stormwater Treatment

Commercial

Jack in the Box – Spring St, 2009



Bioinfiltration Basin



Stormwater Treatment

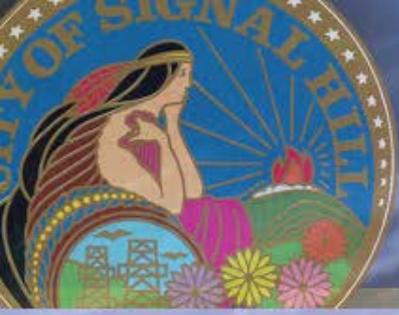
Commercial

Palm Business Park – 2445 N. Palm Drive, 2009



**2nd
System**

Proprietary Biotreatment



Stormwater Treatment

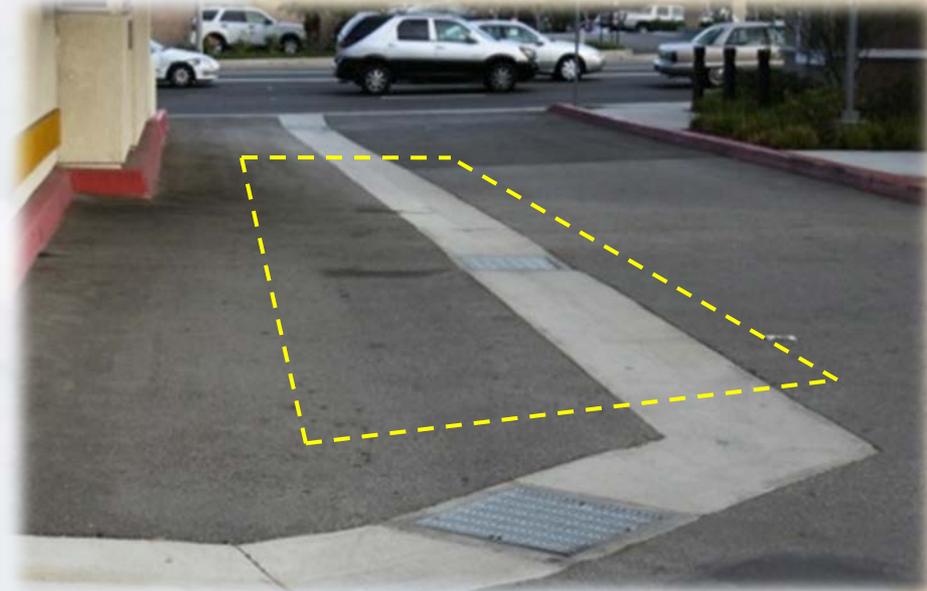
Commercial

US Bank – Cherry Ave, 2009

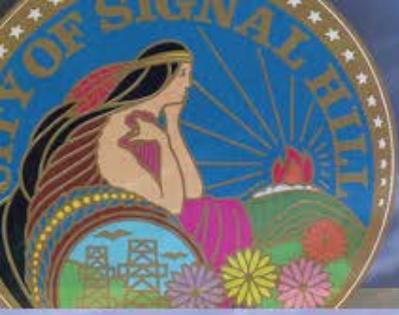
Construction



Finished

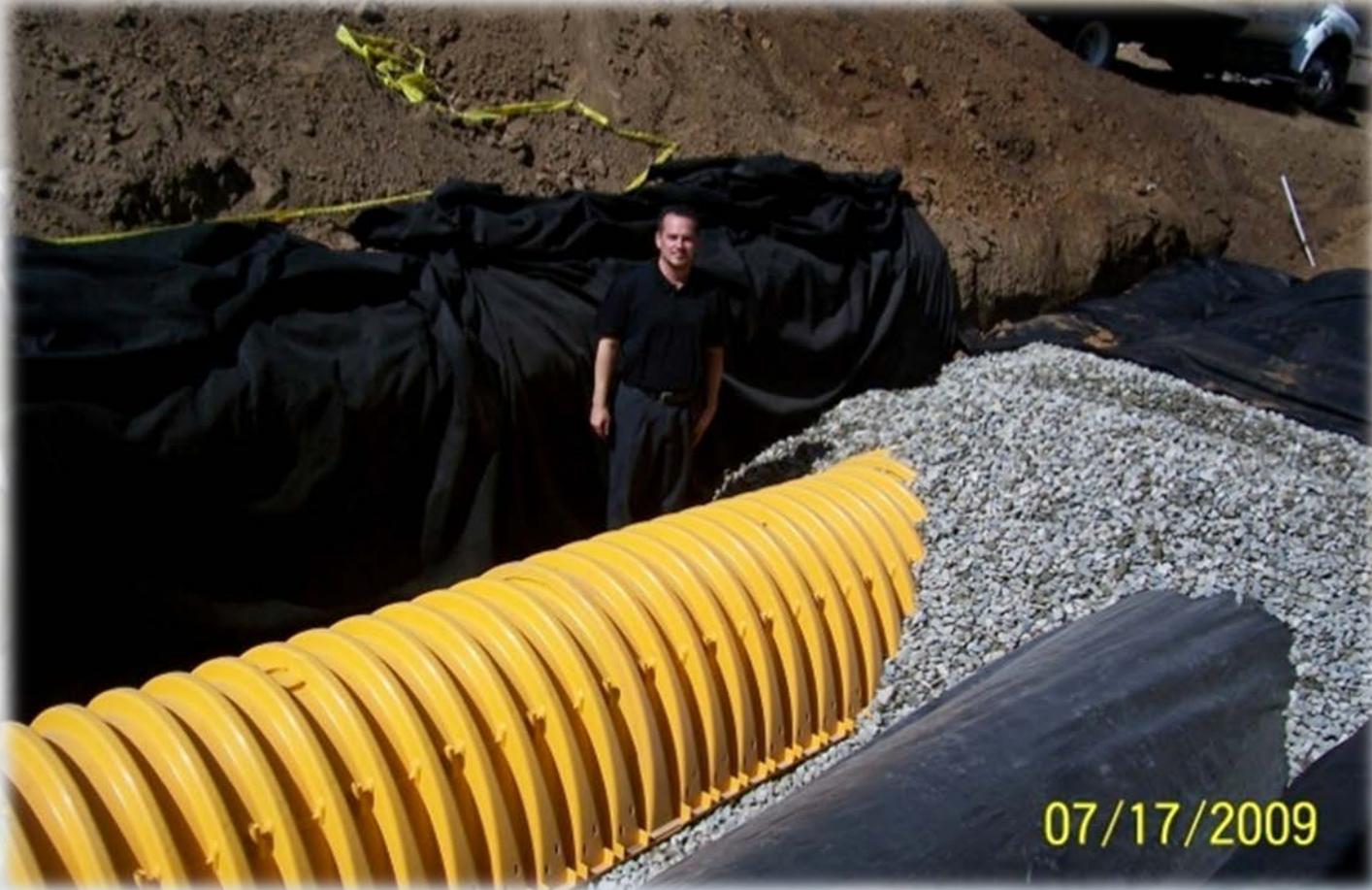


Infiltration Basin



Stormwater Treatment

Commercial



For Scale



Stormwater Treatment

Commercial

Fresh & Easy - Lime Ave, 2010



Bioinfiltration Planter



Stormwater Treatment Construction



Sediment Controls

Orizaba Ave



Stormwater Treatment Construction



Sediment Controls

California Ave



Stormwater Treatment

Trash Capture

- Signal Hill led an effort in the design and testing of a cost-effective trash capture technologies
- Working closely with the Long Beach and Los Angeles County Signal Hill obtained a grant for development of a trash capture system for the Hamilton Bowl
- Since 2007 a total of 27 tons of trash has been removed from the urban water runoff flows.



Hamilton Bowl



City's Alley Cleaning Program

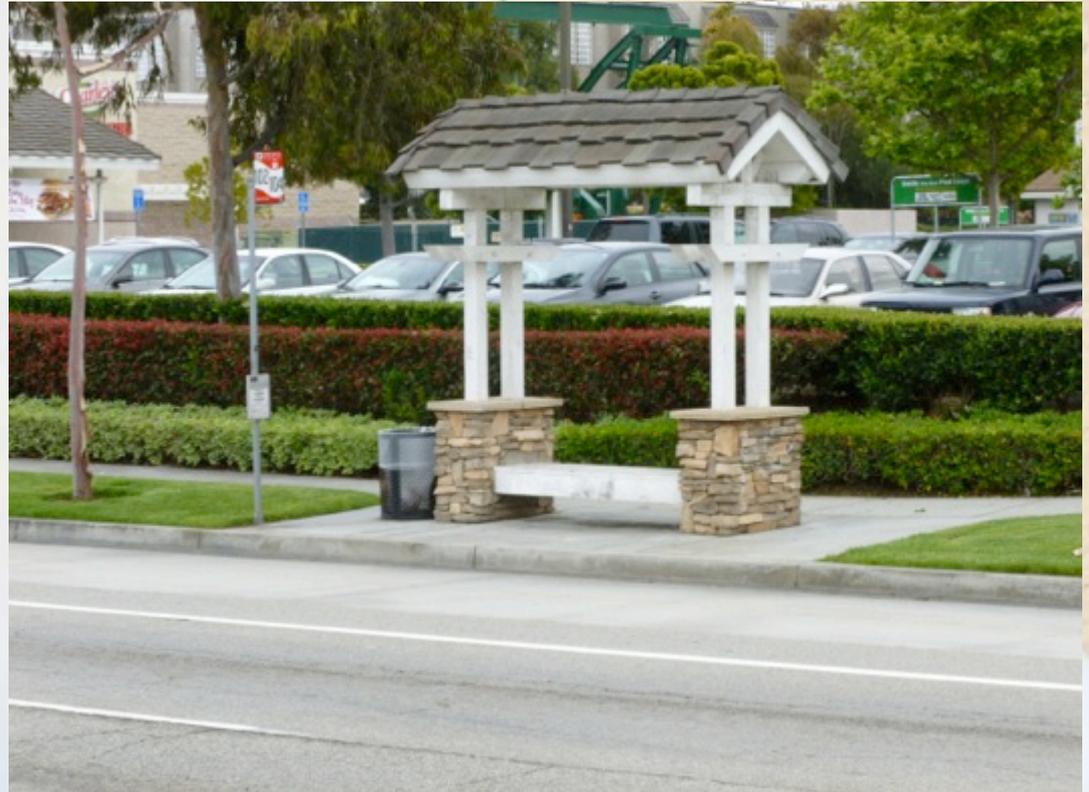
- 20-year program
- Performed monthly by Public Works staff





Bus Stop Cleaning Program

- Contract with Conservation Corps of Long Beach – weekly cleaning of 60 bus stop locations
- Contract with Shelter Clean Services – weekly cleaning of 18 bus stop shelters





Street Sweeping Program





Stormwater Treatment

Trash Capture



Automatic Retractable Screens



Connector Pipe Screens



Used Oil / Haz-waste Collection

- City Residents, Businesses, and Contractors may drop off used oil and other household hazardous waste material directly to the City's corporation yard.
- City staff ensures materials are properly disposed of.





EDCO Recycling and Transfer Station

- Recyclables
- Green Waste
- Construction Debris
- E-Waste
- Household Hazardous Waste
- Residential/commercial Refuse

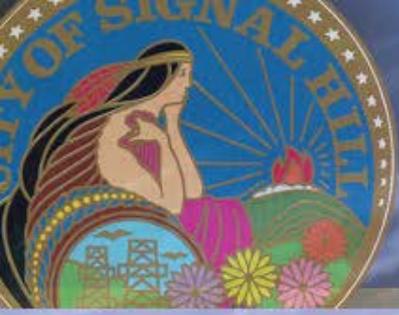


City of Signal Hill

Stormwater Inspections

Illicit Connection/Discharge Elimination





Stormwater Inspections

Stormwater inspectors conduct over 200 inspections annually



Examples of noncompliance issues at industrial/commercial facilities, detected (and abated) due to the City's continued inspection activities



Active and Continuing IC/ID Program



NOV Issued [12-2011]

E. 28th St

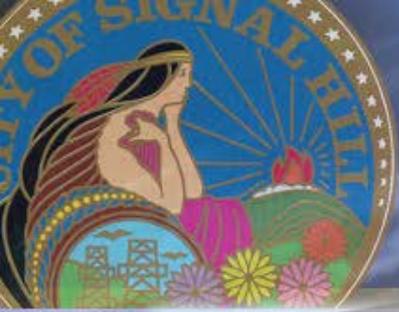


Active and Continuing IC/ID Program



NOV Issued [9-2011]

N. Palm Dr



Active and Continuing IC/ID Program



NOV Issued [4-2011]

Cerritos Ave



Active and Continuing IC/ID Program



NOV Issued [1-2011]

Spring St



Point of Purchase (POP) Outreach

General stormwater educational pamphlet displayed at front counters of local automotive shop and retail landscaping establishment





General Public Outreach

Annual bi-lingual outreach to residents regarding
“First Flush” via utility bill insert

The best thing one can do when it is raining, is to let it rain. *H. W. Longfellow*

The rainy season in Southern California is short yet vital and every drop of water is important! With the rainy season already here, it is important to prepare our homes and environment for rain.

Due to the lack of rain during the summer, there are higher concentrations of pollutants and trash on the ground. The rain storm picks up the trash and pollutants and washes them out to the nearest storm drain. This “flush” of water can cause flooding or pollute the waterbody it goes to. Thus, accumulation of trash and pollutants can harm aquatic life and threaten our water supply.

We are asking for your help to prevent storm water pollution by:

- Clearing your yard, roof & yard rains as well as gutters of leaves and debris. (Remember to recycle green waste.)
- Do not apply herbicides or pesticides before a predicted rainstorm.
- Picking up trash & animal droppings and discarding in the trash.
- Fixing any leaks on your car.
- Covering your trash cans & keeping chemicals, lubricants, and equipment under cover to avoid polluting runoff.
- Recycling hazardous waste, including used oil and filters at local events. Check www.888cleanla.com for events near you.

Storm Drains Are For Rain Only

Signal Hill Stormwater Pollution Prevention Program
(562) 989-7355
www.cityofsignalhill.org

Lo mejor que uno puede hacer cuando esta lloviendo, es dejar que llueva. *H. W. Longfellow*

La temporada de lluvia en el sur de California es corta pero vital y cada gota de agua es importante! La temporada de lluvia ha llegado y es importante preparar nuestros hogares y medioambiente para las lluvias.

Debido a la falta de lluvia durante el verano, hay altas concentraciones de contaminación y basura en el piso. La lluvia levanta la basura y contaminación y se las lleva a la alcantarilla de agua pluvial mas cercana. Este deslave de agua puede causar inundación y puede contaminar el agua a donde se dirige. Así la acumulación de basura y contaminación pueden dañar vida acuática y a nuestra agua potable.

Le pedimos su ayuda para prevenir la contaminación de agua pluvial haciendo lo siguiente:

- Recoja las hojas de árboles y desperdicio de su jardín, techo, alcantarillas y de la bañera. (recuerde de reciclar basura verde.)
- No aplique pesticidas y herbicidas antes de un pronostico de lluvia.
- Recoja basura y desperdicio de animal y desechelos a la basura.
- Arregle goteros de aceite de su carro.
- Mantenga sus botes de basura, quimicos, lubricantes y equipo cubierto para prevenir deslave contaminado.
- Recicle basura peligros, incluyendo aceite usado y filtros de aceite en eventos locales. Visite www.888cleanla.com para eventos cerca de usted.

Las alcantarillas de agua pluvial son para lluvia solamente.

Signal Hill Stormwater Pollution Prevention Program
(562) 989-7355
www.cityofsignalhill.org

Participate in community events offering
interactive stormwater pollution prevention
presentations





Regional Leader Addressing Storm Water

- Signal Hill has demonstrated regional leadership by strongly implementing and enforcing the MS4 permit.
- The City also demonstrated regional leadership by organizing the County, Caltrans, and the 40 cities in the Los Angeles River Watershed to address the Los Angeles River Metals TMDLs.
- Although not all cities agreed to support special studies related to the LA River Metals TMDLs, Signal Hill ultimately convinced 35 cities, the County, and Caltrans to fund critical special studies.



Regional Leader Addressing Storm Water

- Signal Hill organized Jurisdictional Group 1 for the Los Angeles River Metals TMDLs and accommodated the withdrawal of the City of Los Angeles and the County of Los Angeles by reorganizing the Cities pursuant to MOAs with the Gateway COG.
- The City also organized the cities within the Los Cerritos Channel Watershed to work with EPA through MOAs with the Gateway Authority and to work with the Regional Board on an Implementation Plan.
- The City maintains a strong partnership with the City of Long Beach



City of Signal Hill

Proposed Environmental Programs Budget – Fiscal Year 2012-13

Proposed Environmental Program Budget - FY 2013

Acct. No.	Budget Item Description	Proposed FY 12/13 Budget	Comments
510	Personnel	\$ 63,010	
309	Trash Reduction TMDL	\$ 74,575	Storm Water Runoff Trash Capture
347	Annual MS4 Permit Fee	\$ 5,000	Public outreach required per the MS4 Permit
355	Legal Services	\$ 50,000	
356	Storm Water Quality Contract Services & Technical Studies	\$427,000	Includes expenditures required for special studies for newly implemented and proposed TMDL's
372	Restaurant /Industrial Waste Inspections	\$ 44,000	Cost offset by fees
376	Street Sweeping	\$150,400	
	Bus Shelter Cleaning	\$ 31,000	Cost offset by Proposition A
440	Recycling and Haz-Waste	\$ 24,250	
Proposed FY 12-13 NPDES Budget:		\$869,235	

Water Quality Technical Studies Budget

Sub-Acct. No.	Item Description	Budget FY 12/13	Comments
356.1	Current Storm Water Permit Administration	\$ 48,000	<i>On-going annual Expenses</i>
356.2	New Storm Water Permit Implementation	\$120,000	<i>Includes Additional Monitoring & LID Ordinance Development</i>
356.3	LA River Metals TMDL	\$ 22,000	<i>Studies & Implementation Plan</i>
356.4	LA River Bacteria TMDL	\$ 15,000	<i>Studies & Implementation Plan</i>
356.5	LA River Estuary Bacteria TMDL	\$ 20,000	<i>Studies & Implementation Plan</i>
356.6	LA Harbor Toxics TMDL	\$ 20,000	<i>Studies & Implementation Plan</i>
356.7	Los Cerritos Channel Metals TMDL	\$ 17,000	<i>Studies & Implementation Plan</i>
357.8	Hamilton Bowl Low Flow Diversion	\$ 30,000	<i>Preliminary Engineering Phase</i>
357.9	Water Quality Master Plan	\$135,000	<i>Phase 1 & 2</i>
	Total Contracts & Technical Studies =	\$427,000	



FY 12/13 Budget Summary

- Final FY 2011-12 Environmental Program expenditures projected at \$659,000
- Proposed FY 2012-13 Environmental Program expenditures of \$870,000
- Per capita cost of \$78



City of Signal Hill

Thank You!