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1149 SOUTH BROADWAY, 10TH FLOOR
LOS ANGELES, CA 90015
TEL: (213) 485-0587
FAX: (213) 485-3939
WWW.LACITYSAN.ORG

December 13, 2018

Ms. Deborah Smith, Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Dear Ms. Smith:

**BALLONA CREEK WATERSHED MANAGEMENT GROUP COORDINATED
INTEGRATED MONITORING PROGRAM REQUEST FOR REVISION**

The City of Los Angeles, on behalf of the Ballona Creek Watershed Management Group (BCWMG), which also includes the cities of Beverly Hills, Culver City, Inglewood, Santa Monica, West Hollywood, Unincorporated County of Los Angeles and the Los Angeles County Flood Control District, is submitting this letter requesting approval of proposed revisions to the BCWMG Coordinated Integrated Monitoring Program (CIMP). This letter fulfills the requirement within the approved CIMP to submit a separate letter to the Regional Board requesting approval from the Executive Officer. The BCWMG proposes the following revisions (please refer to the enclosed Attachment A for further supporting documentation):

1. The Project Reporting Limit (RL) listed in Table 18 of Attachment C of the CIMP for Total Dissolved Solids (TDS) is 10 mg/L (page 64). To obtain this RL, the BCWMG must use a contract laboratory to conduct the analysis. The use of a contract laboratory (as opposed to the City of Los Angeles' Environmental Monitoring Division [EMD] laboratory) results in an increased cost to the BCWMG and poses a risk related to chain of custody/sample security as the samples must be shipped out for analysis. To reduce costs and risk, the BCWMG is requesting approval to revise the Target RL in Table 18 of Attachment C to 28 mg/L, which EMD can currently attain. There are no TDS water quality objectives applicable to the receiving waters in the BCWMG and detected values are generally an order of magnitude higher than the proposed revised Project RL of 28 mg/L (number of samples = 36 and average = 192 mg/L).
2. The BCWMG is requesting approval of the following revisions to Table 14 of the CIMP (page 28):
 - a. Create footnote 3 which states the following: PAHs includes analyses for the following species: acenaphthene, anthracene, naphthalene, fluorene, phenanthrene,



- benzo(a)anthracene, benzo(a)pyrene, chrysene, dibenz(a,h)anthracene, fluoranthene, and pyrene.
- b. Revise the footnote reference next to PAHs from “(2)” to “(3)”.
 - c. Revise footnote 2 to state “See **Table 6** for a summary of the constituents that comprise chlordane, DDTs, and PCBs.”

The previous reference to the list of PAHs included in Table 6 was not appropriate given that Table 6 refers to analyzing PAHs in suspended sediment. Table 14 refers to analyzing PAHs in the water column.

3. Since the beginning of the Permit term (December 2012), 447 receiving water samples have been obtained for dissolved copper, lead, and zinc in Ballona Creek and Sepulveda Channel, which are addressed by the Ballona Creek Metals TMDL. None of the 447 samples exceeded their respective TMDL numeric targets. Tables 1 through 3 presented in Attachment A to this letter present a summary of the data for dissolved copper, lead, and zinc, respectively. As such, it does not seem necessary to continue to conduct dry weather monitoring nine times per year. Semiannual monitoring (consistent with default frequency specified in the MS4 Permit) should be sufficient to verify that this pattern of non-exceedance does not change. As such, the BCWVG requests approval for the following revisions to Table 6 of the CIMP for receiving water sites located in Ballona Creek (BC_01_NAT and BC_02_SAW) and Table 7 of the CIMP for Sepulveda Channel (SC_CUL):
 - a. Revise the dry weather monitoring frequency of hardness, copper (total and dissolved), lead (total and dissolved), zinc (total and dissolved), and total suspended solids from nine times per year to two times per year.
 - b. Add the following footnote and apply it to hardness, copper, lead, zinc, and total suspended solids that would trigger a return to nine times per year sampling as follows: “*Monitoring sites monitored semiannually during dry weather (i.e., annual frequency is listed as X/2) for monitoring related to the Metals TMDL will be monitored monthly (i.e., annual frequency will become X/9) if there are two consecutive exceedances of the applicable objective observed during dry weather at the monitoring site and would continue until the deactivation criterion is triggered. The deactivation criterion is two consecutive samples that do not exceed the applicable objective during dry weather.*”

If you have any questions regarding our comments, please contact me at (213) 485-0587 or via e-mail at Shahram.Kharaghani@lacity.org.

Sincerely,


SHAHRAM KHARAGHANI, PhD, PE, BCEE
Program Manager

SK:JB:la
WPDCR9471

- c: Renee Purdy, LARWQCB
Ivar Ridgeway, LARWQCB
Vivian Marquez, LASAN
Hubertus Cox, LASAN
Jonathan Ball, LASAN
Taraneh Nik-Khah, LASAN

Attachment A
Summary of Ballona Creek and Sepulveda Channel Metals TMDL Data
Collected During the 2012 MS4 Permit Term

Table 1. Summary of Available Dissolved Copper Data for Waterbodies Addressed by the Ballona Creek Metals TMDL (Coordinated Monitoring Plan Data Collected from January 2013 through November 2015 and Coordinated Integrated Monitoring Program Data Collected from November 2015 through June 2018)

Waterbody	Number of Samples						
	2013	2014	2015	2016	2017	2018	Total
Ballona Creek Reach 1	5	8	5	8	12	4	42
Ballona Creek Reach 2	13	17	11	8	12	4	65
Sepulveda Channel	5	8	5	8	12	4	42
Total	23	33	21	24	36	12	149

Table 2. Summary of Available Dissolved Lead Data for Waterbodies Addressed by the Ballona Creek Metals TMDL (Coordinated Monitoring Plan Data Collected from January 2013 through November 2015 and Coordinated Integrated Monitoring Program Data Collected from November 2015 through June 2018)

Waterbody	Number of Samples						
	2013	2014	2015	2016	2017	2018	Total
Ballona Creek Reach 1	5	8	5	8	12	4	42
Ballona Creek Reach 2	13	17	11	8	12	4	65
Sepulveda Channel	5	8	5	8	12	4	42
Total	23	33	21	24	36	12	149

Table 3. Summary of Available Dissolved Zinc Data for Waterbodies Addressed by the Ballona Creek Metals TMDL (Coordinated Monitoring Plan Data Collected from January 2013 through November 2015 and Coordinated Integrated Monitoring Program Data Collected from November 2015 through June 2018)

Waterbody	Number of Samples						
	2013	2014	2015	2016	2017	2018	Total
Ballona Creek Reach 1	5	8	5	8	12	4	42
Ballona Creek Reach 2	13	17	11	8	12	4	65
Sepulveda Channel	5	8	5	8	12	4	42
Total	23	33	21	24	36	12	149