

RESPONSE TO IMP APPROVAL LETTER OF 11/07/2016 FOR THE NON-PORT AREA, CITY OF LONG BEACH MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004003; ORDER NO. R4-2014-0024

Conditions Bullet No.	IMP Reference	Approval Letter Comment	KLI Response
1	Section 3 Table 3-2	Revise Table 3-2 to include fecal coliform, enterococcus, and total coliform as category 2 pollutants. Additionally, add a footnote for the aforementioned pollutants stating that the San Gabriel River, Estuary, and Tributaries Indicator Bacteria TMDL became effective on June 14, 2016.	“fecal coliform ⁴ , <i>Enterococcus</i> ⁴ , total coliform ⁴ ” was added to the Category 2 Wet Constituents list. Footnote 4 was added to state that “San Gabriel River, Estuary, and Tributaries Indicator Bacteria TMDL became effective on June 14, 2016. The original footnotes 4 and 5 became footnotes 5 and 6.
2	Section 1.2.4	Revise Section 1.2.4 to explain how and why monitoring at the proposed receiving water sites LSBR1, LSBR2 and R8 will provide representative measurement of the effects of the City’s MS4 on the receiving waters to which it discharges	Section 1.2.4 was rewritten to better explain the selection of the receiving water sites to provide representative measurements of the effects of the City’s MS4 on the receiving waters.
3	Section 1 Table 1-2	Revise Table 1-2 Site Description column for the coastal beach sites B5, B56, B60, B7, and B8 to add a more descriptive site description (i.e. beach name, street name).	The descriptive site description has been updated for B5, B56, B60, B7, and B8 prior to me working on this report (as per email to Erum Razzak from Marty 10/26/2016. In addition, Latitude/Longitude locations have been added for B9, B64, B10 and B11.
4	Section 3 Table 3-3	Revise Table 3-3 footnote 3 to specify that one of the two wet weather events monitored for aquatic toxicity will be the first significant storm event of the storm year and that the dry weather event monitored for aquatic toxicity will be during the month with the historically lowest flows.	Table 3-3 footnote 3 was revised by adding a new first sentence saying “One of the two wet weather events monitored for aquatic toxicity will be the first significant storm event of the storm year and the dry weather event monitored for aquatic toxicity will be during the month with historically lowest flows.”
5	Section 3 Table 3-3	Revise Table 3-3 under General and Conventional Pollutants to omit the sentence “(All except total phenols, turbidity, BOD ₅ , MTBE, and perchlorate, chloride, and fluoride)”. Per Attachment E Parts VI.C.1.e and VI.D.1.d, these constituents must be monitored at a minimum in the first year of monitoring during the first significant rain event of the storm year and during the critical dry weather event.	The following text was removed from Table 3-3 under General and Conventional Pollutants “(All <u>except</u> total phenols, turbidity, BOD ₅ , MTBE, and perchlorate, chloride, and fluoride).”

Conditions Bullet No.	IMP Reference	Approval Letter Comment	KLI Response
6	Section 3 Table 3-5	Revise Table 3-5 to add turbidity, MTBE, total phenols, and cyanide.	MTBE, Total Phenols, Turbidity and Cyanide, including method and reporting limits, have been added to Table 3-5.
7	Section 3.1	Revise the text on pages 38-39 consistent with Conditions 5 and 6 above.	The last paragraph of Section 3.1 has been revised to be consistent with Conditions 5 and 6.
8	Section 1 Table 1-2	Revise Table 1-2 for LCC1 by adding a table note to explain that while LCC1 is located in the receiving water, it is treated as an outfall site for purposes of this IMP in order to establish a boundary condition for the pollutant loads entering the portion of Los Cerritos Channel within the City's jurisdiction from the upstream area.	Footnote 1 was added to Table 1-2 stating "LCC1 is located in the receiving water, it is treated as an outfall site for the purposes of this IMP in order to establish a boundary condition for the pollutant loads entering the portion of Los Cerritos Channel within the City's jurisdiction from the upstream area."
9	Section 1 Table 1-2	In Section 1.2 of the IMP 4 th paragraph, revise the 3 rd sentence to replace "west of the Pier (Figure 1-3b)" with "east of the Pier (Figure 1-3b)".	The sentence was revised to read "...east of the Pier (Figure 1-3b)..."
10	Section 6 Table 6-3	Revise Table 6-3 footnote 2 to reference Appendix E instead of Appendix C.	Table 6-3 footnote 2 was changed to reference "Appendix E" instead of Appendix C.
11	Appendix A	Revise Appendix A to add a protocol for collecting samples that fully represent all runoff from each storm event without limiting the time period to 24 hours as previously discussed with Los Angeles Water Board staff.	Appendix A has been revised in the first paragraph and a new paragraph (paragraph 3) has been inserted after paragraph 2.
12		Revise Section 2 under Non-Stormwater Outfall Program to define significant non-tidal flow.	Two new bullets were inserted in Section 2 under Non-Stormwater Outfall Program after the second bullet.
13		Revise Section 6.1 to define "high flow" which is referenced for "Suspect Discharge".	A new paragraph has been inserted after the first paragraph of Section 6.1 and additional text was added into Table 6-1 Element 2 under Timing of Completion. The first numbered bullets after paragraph 7 had the word "significant" added in before "high flows."

Conditions Bullet No.	IMP Reference	Approval Letter Comment	KLI Response
Additional Corrections			
E2 Constituents		An error existed in the IM that indicated that E2 constituents would be analyzed at outfall sites. Verbal permission was received from the RWQCB to correct this error (Erum Razzak)	<ol style="list-style-type: none"> 1. Table 2-1 footnote #1 corrected. 2. Section 2, 4th bullet under “Outfall Stormwater Monitoring” has been corrected. 3. Table 3-3 has been corrected for the class of measurements “MRP Table E-2 Constituents” Outfall Sites. 4. Table 3-3 footnote #1 corrected. 5. Second sentence on page 38 was changed to reflect that the discussion is about receiving water sites. 6. Section 3.3 second sentence on page 41 changed to reflect that the discussion is about receiving water sites. 7. Section 5.1 second paragraph, first sentence on page 63 changed to reflect that the discussion is about receiving water sites. 8. Section 5.1, first full paragraph first sentence on page 64 changed to reflect that the discussion is about receiving water sites.