

Los Angeles Regional Water Quality Control Board

August 25, 2015

Permittees of the Beach Cities Watershed Management Group¹
(See Distribution List)

APPROVAL, WITH CONDITIONS, OF THE BEACH CITIES WATERSHED MANAGEMENT GROUP'S COORDINATED INTEGRATED MONITORING PROGRAM, PURSUANT TO ATTACHMENT E, PART IV.B OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Permittees of the Beach Cities Watershed Management Group:

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board) has reviewed the revised monitoring program submitted on July 21, 2015 by the Beach Cities Watershed Management Group (Group). This monitoring program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop and implement a coordinated integrated monitoring program (CIMP) that achieves the five Primary Objectives set forth in Part II.A of Attachment E and includes the elements set forth in Part II.E of Attachment E. These programs must be approved by the Executive Officer of the Los Angeles Water Board.

The Los Angeles Water Board has reviewed the Group's revised CIMP and has determined that the CIMP includes the elements set forth in Part II.E of Attachment E and will achieve the Primary Objectives set forth in Part II.A of Attachment E of the LA County MS4 Permit.

Public Review and Comment

On July 3, 2014, the Board provided public notice and a 46-day period to allow for public review and comment on the Group's draft CIMP. A separate notice of availability regarding the draft CIMPs, including the Group's CIMP, was directed to State Senators and Assembly Members within the Coastal Watersheds of Los Angeles County. The Board received two comment letters that had comments applicable to the Group's draft CIMP. One joint letter was from the Natural Resources Defense Council (NRDC), Heal the Bay, and Los Angeles Waterkeeper, and the other letter was from the Construction Industry Coalition on Water Quality (CICWQ). During the review of the draft and revised CIMP, the Los Angeles Water Board considered those comments applicable to the Group's proposed CIMP.

¹ Permittees of the Beach Cities Watershed Management Group include Los Angeles County Flood Control District, and the Cities of Hermosa Beach, Manhattan Beach, Redondo Beach and Torrance.

Los Angeles Water Board Review

Concurrent with the public review, the Los Angeles Water Board, along with U.S. EPA Region IX staff, reviewed the draft CIMPs. On May 22, 2015, the Los Angeles Water Board sent a letter to the Group detailing the Board's comments on the draft CIMP and identifying the revisions that needed to be addressed prior to the Board's approval of the Group's CIMP. The letter directed the Group to submit a revised CIMP addressing the Los Angeles Water Board's comments by July 06, 2015. A letter by the Los Angeles Regional Water Board dated June 19, 2015, granted the Group an extension to submit the revised CIMP on July 21, 2015. The Group submitted its revised CIMP on July 21, 2015 for Los Angeles Water Board review and approval.

Santa Monica Bay Nearshore Debris TMDL

Requirements for the Santa Monica Bay Nearshore and Offshore Debris TMDL (SMB Debris TMDL) can be satisfied through the submittal of the Trash Monitoring and Reporting Plan (TMRP) and Plastic Pellet Monitoring and Reporting Plan (PMRP) or via the CIMP. Note that the TMRP and PMRP for the Los Angeles County Flood Control District were approved through the Approval with Conditions of the revised CIMP for the Santa Monica Bay Jurisdiction 2 & 3 EWMP Group dated July 10, 2015.

The review letter on the draft CIMP dated May 22, 2015 approved the following:

1. City of Torrance PMRP exemption request
2. City of Hermosa Beach TMRP
3. City of Hermosa Beach PMRP exemption request
4. City of Manhattan Beach TMRP with a three-year extension of the final compliance date
5. City of Manhattan Beach PMRP exemption request

For all members of the Group with an approved PMRP and PMRP exemption request, please document, in the Annual Report, any new industrial facilities that have an SIC code that corresponds to the manufacturing, handling, or transportation of plastic pellets.

The Board approves the TMRP for the City of Redondo Beach and directs the City to begin implementation of the TMRP immediately.

The Los Angeles Water Board hereby approves, subject to the following conditions, the Group's July 21, 2015 revised CIMP. The Board may rescind this approval if all of the following conditions are not met to the satisfaction of the Board within the timeframe provided below.

1. Revise the CIMP to replace "Error! Reference source not found" language with the appropriate wording.
2. Revise Table 2 to include the annual-based WLA for DDT (27.08 g/yr) and PCBs (140.25 g/yr) per Attachment M, Part C of the permit.
3. Revise Table 2 to include the final WQBEL for Cadmium (1.2 mg/kg dry sediment) per Attachment N, Part E.3.c.ii of the permit and list under "1 : Highest Priority" for Dominguez Channel Estuary.
4. Revise Table 4 to add Cadmium to "Dominguez Channel Estuary (unlined portion below Vermont Ave)."
5. Revise Section 2.2.3 to institute weekly bacteriological monitoring at O-7 based on the size and location of the outfall and observational data on the frequency of dry weather flow reaching the wave wash.

6. Revise Section 2.2 to state that applicable shared monitoring data from the City of Los Angeles will be included in the Beach Cities WMG annual reports rather than incorporating the monitoring data by reference.
7. Provide documentation that acknowledges the agreement between City of Los Angeles and Beach Cities to share monitoring data.
8. Revise Table 2 to include the following changes:
 - a. Add 303(d) listed pollutant, ammonia, for Dominguez Channel (including Torrance Lateral) under category 2.
 - b. Add 303(d) listed pollutants, ammonia and coliform bacteria, for Dominguez Channel Estuary under category 2.
 - c. Add cadmium for Dominguez Channel Estuary under Category 1 - 3/23/2032 (final sediment WQBEL: 1.2 mg/kg)
9. Revise Table 6 to include all parameters applicable to S28 (e.g. pollutants addressed by an applicable TMDL, 303(d) listed pollutants) specifically copper, lead, zinc, ammonia, and indicator bacteria for a monitoring frequency of 3 wet weather and 2 dry weather events.
10. Revise Section 5.6.2 to state that non-stormwater outfall monitoring will occur during days when precipitation is < 0.1 inch and those days not less than 3 days after a rain day. A rain day is defined as those with ≥ 0.1 inch of rain. An alternative criterion may also be proposed.
11. Revise the City of Redondo Beach PMRP exemption request to include all the information in the Clarification to the PMRP Exemption request that was submitted with the revised CIMP and provide justification that King Harbor Marine Center with an SIC Code 3732 does not manufacture, handle, or transport plastic pellets.
12. Revise the City of Torrance TMRP to list an 80% or greater reduction milestone in Year 7 (2019). Additionally, include the following information: *"The Doris Sump watershed flows to a Los Angeles County storm drain pump station and Avenue I flows to a Los Angeles County Low Flow Diversion Pump Station. Both pump stations have trash screens ahead of the pump systems. Therefore the 23% of Santa Monica Bay catch basins within these watersheds are already addressed. Combined with the 65% of catch basins currently screened with the completion of the Stormwater Basin Enhancement Project, the percentage complete for the City of Torrance is currently 88%."*
13. Revise the last sentence of Appendix A Section A.1.4 to clarify that only the City of Manhattan Beach and not the City of Hermosa Beach will have a final compliance date that is extended three years.

In separate correspondence to all Permittees developing CIMPs and Integrated Monitoring Programs (IMPs), the Los Angeles Water Board provided clarification of requirements for toxicity monitoring – specifically regarding additional toxicity monitoring upstream and at outfalls where toxicity is identified during a sampling event at a receiving water monitoring site.

The Group shall submit a final CIMP to the Los Angeles Water Board that satisfies all of the above conditions no later than **September 24, 2015**. Pursuant to Attachment E, Part IV.C.6 of the LA County MS4 Permit, the Group must commence implementing its monitoring program within 90 days after this approval of the final CIMP (i.e. no later than November 23, 2015). Please note that the Group is responsible for complying with all reporting provisions included in Attachment E, Part XIV – XVIII, Section B of Part XIX, "Reporting Requirements for Santa Monica Bay WMA TMDLs", Section C of Part XIX, "Reporting Requirements for Dominguez Channel and Greater Harbors Waters WMA TMDLs", and Attachment D, Sections IV, V, and VII.A of the LA County MS4 Permit. Additionally, the Group is also responsible for complying with the following requirements under Annual Reporting and Adaptive Management.

Annual Reporting

Within the reporting year, through its Annual Report per Attachment E, Part XVIII of the LA County MS4 Permit, the Group shall provide an Integrated Monitoring Report that summarizes all identified exceedances of:

- outfall-based stormwater monitoring data,
- wet weather receiving water monitoring data,
- dry weather receiving water monitoring data, and
- non-storm water outfall monitoring data

against all applicable receiving water limitations, water quality-based effluent limitations, non-storm water action levels, and aquatic toxicity thresholds as defined in Sections XII.F and G of this MRP. All sample results that exceeded one or more applicable thresholds shall be readily identified.

The Annual Report shall also include a Municipal Action Level (MAL) Assessment Report, which shall present the stormwater outfall monitoring data in comparison to the applicable MALs, and identify those subwatersheds with a running average of twenty percent or greater of exceedances of the MALs in discharges of stormwater from the MS4. Please note that beginning in Year 3 after the effective date of the LA County MS4 Permit, each Permittee or group of Permittees shall submit a MAL Action Plan with the Annual Report (first MAL Action Plan due with December 15, 2015 Annual Report) to the Los Angeles Water Board Executive Officer, for those subwatersheds with a running average of twenty percent or greater of exceedances of the MALs in any discharge of storm water from the MS4. Please note that implementation of an approved Watershed Management Program (WMP) or Enhanced Watershed Management Program (EWMP) per Part VI.C of the LA County MS4 Permit fulfills all requirements related to the development and implementation of the MAL Action Plan, as per Attachment G of the LA County MS4 Permit, for those pollutants addressed by the WMP or EWMP.

Adaptive Management

The Board or its Executive Officer, consistent with 40 CFR section 122.41, may approve changes to the Monitoring and Reporting Program, after providing the opportunity for public comment, either:

1. By request of the Group or by an interested person after submittal of the Monitoring Report. Such request shall be in writing and filed not later than 60 days after the Monitoring Report submittal date, or
2. As deemed necessary by the Los Angeles Water Board Executive Officer, following notice to the Group.

As part of the adaptive management process, any modifications to the CIMP must be submitted to the Los Angeles Water Board for review and approval. The Group must implement any modifications to the CIMP upon approval by the Los Angeles Water Board or its Executive Officer, or within 60 days of submittal of modifications if the Los Angeles Water Board or its Executive Officer expresses no objections. Note that the Group's Report of Waste Discharge (ROWD) is due no later than July 1, 2017. To align any modifications to the CIMP proposed through the adaptive management process with permit reissuance, results of the first adaptive management cycle should be submitted in conjunction with the Group's ROWD.

If you have any questions, please contact Ms. Erum Razzak of the Storm Water Permitting Unit by electronic mail at Erum.Razzak@waterboards.ca.gov or by phone at (213) 620-2095.

Alternatively, you may also contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,



Samuel Unger, P.E.
Executive Officer

Enclosures: Beach Cities Watershed Management Group Distribution List

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