

## Los Angeles Regional Water Quality Control Board

July 22, 2015

Mr. John Davidson  
City Manager  
City of Irwindale  
5050 N. Irwindale Ave.  
Irwindale, CA 91706

### REVIEW OF THE CITY OF IRWINDALE'S REVISED INTEGRATED MONITORING PROGRAM, PURSUANT TO ATTACHMENT E, PART IV.A OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Mr. Davidson:

The Regional Water Board has reviewed the revised monitoring program submitted on February 26, 2015 by the City of Irwindale (City). 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 individually develop and implement an integrated monitoring program (IMP) 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 Regional Water Board.

The Regional Water Board has reviewed the City's revised monitoring program and has determined that, while the IMP generally includes the required elements set forth in Part II.E of Attachment E, additional revisions are still needed. The Regional Water Board's comments on the City of Irwindale's IMP, including detailed information concerning necessary additions and revisions to the IMP, are found in Enclosure 1.

Please note that per the Notice of Deficient Submittal letter sent to the City on October 7, 2014, the City is subject to the baseline requirements of the LA County MS4 Permit, including Receiving Water Limitations (Part V.A.1) and applicable interim and final water quality-based effluent limitations (WQBELs) in Part VI.E and Attachment O, Parts A-D and G, and Attachment P, Part A. Further, Permittees that are not subject to the Watershed Management Program provisions (Part VI.C) were required to either begin monitoring pursuant to the requirements of Attachment E of the LA County MS4 Permit by June 28, 2013, or submit an IMP by December 28, 2013.

Please make the necessary additions and revisions to the IMP, as identified in the enclosures to this letter, and submit the revised IMP as soon as possible and no later than **August 21, 2015**. The revised IMP must be submitted to [losangeles@waterboards.ca.gov](mailto:losangeles@waterboards.ca.gov) with the subject line "LA

County MS4 Permit – 2<sup>nd</sup> Revised City of Irwindale Integrated Monitoring Program” with a copy to [Ivar.Ridgeway@waterboards.ca.gov](mailto:Ivar.Ridgeway@waterboards.ca.gov) and [Erum.Razzak@waterboards.ca.gov](mailto:Erum.Razzak@waterboards.ca.gov).

Upon approval of the revised IMP by the Executive Officer, the City must prepare to commence its monitoring program immediately. If the necessary revisions are not made, the City must comply with the Monitoring and Reporting Program and future revisions thereto, in Attachment E of the LA County MS4 Permit.

Until the City's IMP is approved by the Executive Officer, the monitoring requirements pursuant to Order No. 01-182 and Monitoring and Reporting Program CI 6948, and pursuant to approved TMDL monitoring plans shall remain in effect for the City.

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](mailto: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](mailto:Ivar.Ridgeway@waterboards.ca.gov) or by phone at (213) 620-2150.

Sincerely,



Samuel Unger, P.E.  
Executive Officer

cc: Mr. William Tam, P.E., Public Works Director, City of Irwindale  
Ms. Elizabeth Rodriguez, Public Works Analyst, City of Irwindale

Enclosures: Enclosure 1 – Summary of Comments and Required Revisions

Los Angeles Regional Water Quality Control Board

**Enclosure 1 – Summary of Comments and Necessary Revisions to Revised IMP**

**City of Irwindale**

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
<b>General</b>		
		As the State Water Board concluded its proceedings addressing the administrative petitions of the LA County MS4 Permit, Order R4-2012-0175, on June 16, 2015, remove all references to the MS4 administrative petition from the IMP.
Section 1.0		The IMP references the old LA County MS4 Permit Order No. 01-182 where Section 1.0 of the IMP references Attachment U. However, please note that the latest LA County MS4 Permit Order No. R4-2012-0175 (LA County MS4 Permit) is currently the active permit and therefore, the LA County MS4 Permit Order No. R4-2012-0175 should be referenced along with Attachment E, the Monitoring and Reporting Program, not Attachment U.
Section 1.0		<p>The IMP states that “the Permit, under the WMP section, does not specify which pollutants and water quality standards must be monitored for or met. Discussions with the Regional Board staff revealed that the water quality standards are mandated by federal regulations. They can be taken from the previous Permit under MS4 Permit’s MRP under Attachment U.”</p> <p>The LA County MS4 Permit Attachment E Table E-2 as well as Attachments L-R specify the applicable receiving water limitations and water quality based effluent limitations to which MS4 discharges are subject. Attachment U of the old LA County MS4 Permit Order No. 01-182 should not be referenced.</p>
Sections 1.2 and 1.3		<p>Section 1.2 of the IMP states that the City intends to share costs with other cities for conducting ambient monitoring. The IMP should specify what type of monitoring (i.e. receiving water monitoring) the City is collaborating on and which cities are monitoring which stations. In addition, the City must provide a copy the final agreement(s) between the City of Irwindale, West Covina, and South El Monte to conduct monitoring through an IMP as per Attachment E of the LA County MS4 Permit.</p> <p>Note that South El Monte has joined the CIMPs for the Upper Los</p>

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		<p>Angeles River Watershed Management Group and the Upper San Gabriel River Watershed Management Group, while West Covina has indicated its intent to join the Upper San Gabriel River Watershed Management Group. Therefore, the City of Irwindale must confirm with each city if the cost sharing arrangement proposed in Section 1.2 of the City's IMP is still valid. If not, the IMP must be revised to confirm that the City will independently support the required receiving water monitoring.</p>
Section 1.3		<p>Section 1.3 of the IMP states that "The City will use the grab sampling method for receiving water sampling at the channel overpass because it cannot access Los Angeles County's jurisdictionally permitted area".</p> <p>As per the Regional Water Board's correspondence with the Los Angeles County Department of Public Works, the City's statement is partially accurate. The Los Angeles County Flood Control District (LACFCD) does limit access to certain portions of the channel banks, levees, and/or access roads in the Los Angeles River and San Gabriel River watersheds.</p> <p>However, for the reaches of the channels that have gated access, the LACFCD does allow others to access their facilities through their Flood Permitting process. A number of MS4 Permittees have already applied for and received their Flood Permits to begin their non-stormwater outfall screening and to find suitable locations for temporary and permanent water quality monitoring stations. MS4 Permittees, including the LACFCD, have shown that they are able to safely take water quality samples during storm events, and therefore, LACFCD does not prohibit such activities.</p> <p>When an applicant applies for a Flood Permit, the duration for permit issuance is typically related to the quality and completeness of the application and required submittals, as well as the complexity of review. For example, if permanent structures are proposed in an LACFCD facility, particularly in the invert of a Corps-engineered channel funded by the Federal Government, the review is likely to take longer than a permit to just enter to take pictures and observations. On average, the review time given by the Land Development Division for Flood Permits is 4-6 weeks. Information on Flood Permit requirements, forms, applications, references, fees, etc. can be found here:  <a href="http://dpw.lacounty.gov/permits/">http://dpw.lacounty.gov/permits/</a></p>
Section 1.10		Section 1.10 of the IMP appears to be intended to identify not only

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		<p>TMDL monitoring, but also monitoring of other constituents as required by Attachment E. Thus, the title should be revised to reflect the broader scope of chemical monitoring described in Section 1.10.</p> <p>Section 1.10 should clearly state that tables VII-VIII identify constituents for TMDL based receiving water, stormwater outfall, and non-stormwater outfall based monitoring.</p> <p>Table VI is missing some required constituents such as cadmium in Rio Hondo Reach 2 and bacteria in San Gabriel River Reach 3.</p>
Section 1.10	Attachment O Parts G.8-G.13 (page O-20 to O-26)	Section 1.10 of the IMP is missing a table identifying TMDL WLAs and monitoring for Peck Road Park Lake TMDLs.
Table VI		Please correct typographical error in Table VI of the IMP: "Cooper" to "Copper".
		<p>The IMP should acknowledge the TMDL Monitoring Plans that the City has submitted and is participating in:</p> <ul style="list-style-type: none"> <li>• Monitoring Work Plan to Assess Nutrients Loading from the Municipal Separate Storm Sewer System in Los Angeles River Watershed (March 23, 2005).</li> <li>• Coordinated Monitoring Plan for Los Angeles River Watershed Bacteria TMDL – Compliance Monitoring (March 23, 2013).</li> <li>• Los Angeles River Metals TMDL Coordinated Monitoring Plan (March 25, 2008) – Approved April 11, 2008.</li> </ul>
	Attachment O Table O-1 Segment B Tributaries (Rio Hondo and Arroyo Seco) (page O-8 to O-9)	As per the Los Angeles River Bacteria TMDL, the IMP should acknowledge if the City will be submitting a Load Reduction Strategy (LRS) for Segment B Tributaries (Rio Hondo and Arroyo Seco) by March 23, 2016 or submitting an alternative compliance plan.
	Part VI.C.1.d.iii (page E-16), VI.D.1.c.iii (page E-17), & VIII.B.1.c.iii (page E-23)	The IMP states that non-stormwater outfall-based monitoring will address 303(d) listed pollutants. The IMP should also specify that receiving water and stormwater outfall-based monitoring will include testing for 303(d) listed pollutants that are not addressed by TMDLs. Appendix B of the IMP, which lists the applicable 303(d) list pollutants should be referenced.

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Table VI		"Toxicity", "TIE", and "303(d) listed pollutants" should be added to Table VI of the IMP.
Table VI		Please add Cadmium to Table VI of the IMP for LAR – Rio Hondo Reach 2.
Table VII	Attachment O (page O-1 to O-3)	The following corrections should be made for Table VII of the IMP: <ul style="list-style-type: none"> <li>• Specify 30-day average WLA for NH<sub>3</sub>-N (2.3 mg/L).</li> <li>• Specify dry weather E. coli interim WLA for Rio Hondo (2 X 10<sup>9</sup> MPN/Day).</li> <li>• Note that with the exception of metals, WLAs listed for bacteria, nitrogen compounds, and trash are for wet and dry weather, or for annual discharge (i.e., trash).</li> </ul>
Table VII	Attachment O Part D.4.a (page O-7)	Annual Allowable Exceedance Days of the Single Sample Objective should be specified as per LA County MS4 Permit Attachment O Part D.4.a.
Table IX		Correct the compliance deadlines for 100% of the total drainage area meeting dry-weather WLAs and 65% of the total drainage area meeting the wet-weather WLAs as per the Implementation Plan for the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL. The IMP identifies the deadline as September 30, 2026; however, the correct date is September 30, 2023.
Table IX		The final compliance target of 100% of the total drainage area meeting the wet weather WLAs and compliance deadline of September 30, 2026 should be added to Table IX.
Table X		Table X should specify the exact compliance deadlines, including the day as well as the month and year (e.g., January 11, 2020).
Section 1.11	Attachment O Table O-1 Segment B Tributaries (Rio Hondo and Arroyo Seco) (page O-8 to O-9)	Table XI "Bacteria TMDL for Reach 2 of the Rio Hondo" is missing content. For the Los Angeles River Bacteria TMDL implementation schedule, please refer to Chapter 7-39.3 of the Basin Plan or Attachment A of Resolution No. R10-007. The implementation schedule is also outlined in the LA County MS4 Permit Attachment O Table O-1 Segment B Tributaries (Rio Hondo and Arroyo Seco).
Table XIII		Table XIII of the IMP should specify the exact date of compliance, September 30 <sup>th</sup> , in addition to the year.
Section 1.14	LA County MS4 Permit Part V.A.1-4 (page 38-39) & VI.E.2 (page 141-145)	The IMP states that, "The City takes the position that the detection of an exceedance does not constitute a violation. Any persistent exceedance of a TMDL or water quality standard monitored over the term of the Permit would not constitute a violation provided that (1) the SWMP/WMP is being implemented in a timely and complete manner; and (2) complies with the iterative process described in MS4 Permit section V.A.1-4."

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		<p>As per the Regional Water Board’s Notice of Deficient Submittal letter dated October 7, 2014, the City is subject to the baseline requirements of the LA County MS4 Permit. Therefore, condition (1) is not applicable. Compliance will be determined based on an evaluation of monitoring data against receiving water limitations and WQBELs per Parts V.A, VI.E.2.d.i.(1)-(3), VI.E.2.e.i.(1)-(3), or VI.E.3.e of the LA County MS4 Permit.</p>
	<p>Attachment D Part III.B (page D-5)</p>	<p>The IMP should clearly state that that monitoring for all the constituents that will be tested will be conducted according to test procedures approved under 40 CFR Part 136 for the analysis of pollutants unless another test procedure is required under 40 CFR subchapters N or O or is otherwise specified in the Los Angeles County MS4 permit for such pollutants [40 CFR sections 122.41(j)(4) and 122.44(i)(iv)].</p>
<p>Table XVII</p>	<p>Table E-2 (page E-17 to E-20)</p>	<p>Table XVII – WMP Monitoring for Non-TMDL Water Quality Standards in the IMP is missing 2 constituents:</p> <ul style="list-style-type: none"> <li>• E. coli</li> <li>• Benzo(k)flouranthene.</li> </ul> <p>In addition, Table XVII of the IMP does not show the correct MLs for the following constituents:</p> <ul style="list-style-type: none"> <li>• Bis(2-Chloroethoxy) methane</li> <li>• Bis(2-Chloroisopropyl) ether</li> <li>• Bis(2-Chloroethyl) ether</li> <li>• Bis(2-Ethylhexl) phthalate</li> <li>• Butyl benzyl phthalate</li> <li>• 2-Chloroethyl vinyl ether</li> <li>• 2-Chloronaphthalene</li> <li>• 4-Chlorophenyl phenyl ether</li> <li>• Dibenzo(a,h)anthracene</li> <li>• 1,3-Dichlorobenzene</li> <li>• 3,3-Dichlorobenzidine</li> <li>• Diethyl phthalate</li> <li>• di-n-Butyl phthalate</li> <li>• 2,4-Dinitrotoluene</li> <li>• 1,2-Diphenylhydrazine</li> <li>• di-n-Octyl phthalate</li> <li>• Fluoranthene</li> <li>• Fluorene</li> <li>• Hexachlorobenzene</li> <li>• Naphthalene</li> </ul>

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		<ul style="list-style-type: none"> <li>Nitrobenzene</li> </ul> <p>Please refer to the LA County MS4 Permit Attachment E Table E-2 for the correct MLs for the aforementioned constituents.</p>
Table XVII	Attachment D Part III.B (page D-5) & Attachment E Part III.G (page E-6)	<p>Table XVII of the IMP lists "Congeners3". The IMP should be revised to list the specific congeners which will be used, preferably as a footnote in Table XVII of the IMP.</p> <p>Please note that monitoring for PCBs in sediment or water should be reported as the summation of aroclors and a minimum of 40 (and preferably at least 50) congeners. See Table C8 in the state's Surface Water Ambient Monitoring Program's Quality Assurance Program Plan (Page 72 of Appendix C), which can be downloaded at <a href="http://www.waterboards.ca.gov/water_issues/programs/swamp/docs/qapp/qaprp082209.pdf">http://www.waterboards.ca.gov/water_issues/programs/swamp/docs/qapp/qaprp082209.pdf</a> for guidance.</p>
Section 1.18 & Table XVIII		Please correct typographical error in the IMP Section 1.18 and Table XVIII: "CIMP" to "IMP".
Table XVIII		Please update Table XVIII – Implementation Schedule of the IMP to include receiving water, non-stormwater outfall monitoring, and any additional changes in the revised IMP.
<b>Receiving Water Monitoring</b>		
Section 1.0	Parts VI.A, VI.C, VI.D (page E-13 to E-16)	The IMP lists the types of monitoring required by the permit, but omits receiving water monitoring for pollutants other than those addressed by a TMDL. Receiving water monitoring is required during both wet and dry weather per Attachment E, Parts VI.A, VI.C, and VI.D.
Section 1.2 & Table XVIII		<p>Section 1.2 of the IMP states that "Though the SWAMP should be responsible for performing ambient monitoring, it is not known when, if ever, it intends to conduct ambient monitoring in these reaches. In the meantime, the City recognizes that the ambient monitoring approach will yield accurate data needed to evaluate the beneficial uses and facilitate compliance with ambient TMDL WLAs and other water quality standards."</p> <p>Table XVIII of the IMP states that "if no data exists the City shall contract for the CWH to conduct ambient monitoring once during the term of the Permit for Reach 2, Rio Hondo and Reach 3 of the San Gabriel River."</p> <p>Please note that ambient monitoring data collected once during the term of the permit for Reach 2, Rio Hondo and San Gabriel</p>



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		River Reach 3 is not sufficient to fulfill the receiving water monitoring requirements of the LA County MS4 Permit.
Sections 1.2 & 1.3	Part II.E.1 (page E-4)	As stated above, receiving water monitoring during both wet and dry weather is a requirement of the LA County MS4 Permit. Therefore, the statement in Section 1.2 that receiving water monitoring (referred to as “ambient” monitoring in the IMP) is voluntary, and that the City does not plan to conduct or otherwise support receiving water monitoring to determine compliance with wet weather TMDLs must be deleted. Additionally, the second and third paragraphs of Section 1.3 must be deleted for the same reason. The City must comply with all wet and dry weather TMDL monitoring requirements of the LA County MS4 Permit for receiving waters.
Section 1.3	Part VI.A.1.b.ii (page E-14)	<p>The proposed mass emissions station S14 is too far downstream to adequately characterize the potential impact of the City’s MS4 discharges on receiving water. Instead, another receiving water station for San Gabriel River should be chosen that is more immediately downstream of the City’s MS4 discharges (such as in San Gabriel River Reach 3).</p> <p>Alternatively, the City can use the proposed mass emissions station S14 as long as it additionally proposes monitoring and/or data/cost sharing for the Upper San Gabriel River Group’s Metals TMDL compliance sites USGR_R4_RAM (San Gabriel River Reach 4) and USGR_WCW_BP (Walnut Creek).</p> <p>To justify the selection of receiving water/TMDL compliance stations within the SGR watershed, please provide information on what percent of the City’s land within the SGR watershed drains to each of the receiving water bodies to which the City’s MS4 discharges – particularly SGR Reach 3 and Walnut Creek, and the land use distributions in each of those subdrainage areas.</p> <p>Please note that the City is missing a TMDL compliance station for Peck Road Park Lake (for water column, suspended sediment, and fish tissue monitoring). The City could propose monitoring and/or data/cost sharing for the Rio Hondo/San Gabriel River Water Quality Group’s TMDL compliance station RHSGR_PRP_LAKE (Peck Road Park Lake).</p>
Section 1.10 & Table III		Section 1.10 and Table III notes that monitoring will occur at the LA River Estuary and the mouth of San Gabriel River as per the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL (Harbor Toxics TMDL). If the

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		City intends to collaborate with other Permittees and/or groups (e.g. Lower Los Angeles River Group and Lower San Gabriel River Group) for the Harbor Toxics TMDL monitoring, the IMP should clearly acknowledge which Permittees and/or groups the City is collaborating with. In addition, a copy of the agreement should be provided with the IMP.
Section 1.17	Part VI.C.1.b.iii (page E-15)	<p>The IMP states that “[a]t a minimum two additional rainfall events with a minimum separation of three dry days (less than .1 inch of rain per day) between monitoring will be monitored to meet the minimum requirement of three storm events per year.”</p> <p>The IMP should further specify that the two additional rainfall events will be within the same wet weather season.</p>
Section 1.17		The IMP states that the driest month of the year is in August. Please provide or reference precipitation data and/or other data to support that August is historically the driest month of the year.
Section 1.17	Part VI.D.1.b.ii (page E-17)	The IMP should define dry weather as when the flow is less than 20 percent of the base flow or as defined by the effective TMDLs within the watershed.
Section 1.17	Part VI.D.1.d (page E-17)	The IMP should specify that parameters in Table E-2 of the LA County MS4 Permit shall be monitored in the first year during the critical dry weather event.
Section 1.17	Part VI.C.1.e (page E-16)	The IMP should specify that parameters in Table E-2 of the LA County MS4 Permit shall be monitored in the first year of monitoring during the first significant rain event of the storm year.
Appendix A-1 & Table III		Appendix A-1 and Table III of the IMP specifies the locations for the receiving water stations. All receiving water stations given in Table III should be given alphanumeric identifier except for mass emission stations or existing monitoring stations where the existing alphanumeric identifier should be specified. Additionally, all receiving water stations in Appendix A-1 of the IMP should be labeled with alphanumeric identifiers consistent with Table III of the IMP.
Appendix A		Receiving water maps provided in Appendix A of the IMP are unclear. Please provide a map clearly showing the receiving water bodies within the City’s jurisdiction.
<b>Storm Water Outfall Based Monitoring</b>		
Table I		<p>Based on the numbers given in Table I of the IMP, the following corrections should be made:</p> <ul style="list-style-type: none"> <li>• Total for San Gabriel River shows 5263.9 acres but should be 5318.72 acres.</li> <li>• Total for Public land use is listed as 2373.7 acres but</li> </ul>

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		should be 2373.63 acres. <ul style="list-style-type: none"> <li>Total acres is listed as 6080 acres but should be 6134.85 acres.</li> </ul>
Table II		Table II of the IMP lists the total acres for Santa Fe Flood Control Basin – SGR HUC-12 as 4414.5 acres but should be 4404.6 acres.
Table I & IV		Land use breakdowns for M1 and the Santa Anita Wash – Rio Hondo HUC-12 drainage area as per Table I and IV of the IMP are the same. Does this imply that the catchment area of M1 covers all of the drainage area of the Santa Anita Wash – Rio Hondo HUC-12?
Table I, II, & IV		The land use category “Public” in Table I, II, and IV of the IMP is vague. Please clarify.
	Part VII.A.6 (page E-21)	The IMP must provide the location and length of all open channels and underground pipes 18 inches in diameter or greater (with the exception of catch basin connector pipes).
	Part VII.A.7 (page E-21)	The IMP must state if there are any dry weather diversions that divert flow for any of the major outfalls within the City’s jurisdiction.
Appendix A-1	Part VII.A.8 (page E-21)	Appendix A-1 of the IMP shows outfall locations. The map in Appendix A-1 of the IMP should label all the major outfalls with the ID Numbers given in Table V of the IMP.
Section 1.4	Part II.E.2 (page E-4)	<p>Clarify that stormwater outfall monitoring will be used, as required, to determine whether the City’s discharge is in compliance with applicable stormwater WQBELs derived from wet weather TMDL WLAs. Delete sentence that states that outfall monitoring cannot determine compliance with wet weather TMDL WLAs in the receiving water and the following sentence as these are inconsistent with permit requirements.</p> <p>The City must measure stormwater outfall monitoring results against the applicable receiving water limitations and WQBELs to which it is subject in Attachment O, Parts A-D and G, and Attachment P, Part A.</p>
Section 1.4	Part VIII.A.2.a (page E-21)	<p>Section 1.4 of the IMP states that “[o]ne outfall from each reach will be sampled (one for Reach 2 of the Rio Hondo and one for Reach 3 of the San Gabriel River) each year over the term of the permit in an alternating manner.” However, Appendix A-3 of the IMP shows that the City falls within 3 HUC-12 drainage areas.</p> <p>Therefore, at least 3 field screening points, 1 for each HUC-12 drainage area, should be monitored per year.</p> <p>Additionally, in Section 1.4, it is stated that the City identified 3</p>

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		<p>outfalls (p. 7), but in Table V of the same section 5 outfalls are listed. Please revise Section 1.4 to align with Table V and clearly identify the City's plan for monitoring outfalls (or corresponding field screening points) each year.</p> <p>Also clarify if any of the field screening points drain to, or are representative of the City's drainage to, Peck Road Park Lake.</p>
Section 1.5	Part VII.A.9 (page E-21)	Section 1.5 of the IMP notes that an inventory will be developed of major MS4 outfalls with known significant non-stormwater discharges and those requiring no further assessment. The IMP should state that this inventory will be updated annually.
	Part VII.A.10 (page E-21)	Storm drain outfall catchment area maps for each major outfall within the City's jurisdiction are missing. If these are not currently available, provide a schedule for delineating the catchment areas and submitting the delineations to the Regional Water Board.
Table IV	Part VIII.A.2.b (page E-21)	Although the draft IMP claims that each of the field screening points is representative of land uses within the City's jurisdiction, there is insufficient justification for selection of the points. To provide sufficient justification, the City must provide a land use map that shows the catchment area (also known as the drainage area) for each field screening point. Land use tabular data in Table I and II of the IMP as compared to Table IV should be used as support for a brief written justification on why each of the field screening points best represents the City's land use.
Table IV, V, & Appendix A-3		Table IV, V, and Appendix A-3 use different identifiers to label the outfall monitoring locations such as M1, 1, and Field Screening Point # 1 respectively. Please choose one type of alphanumeric identifier for consistency. Also, clarify the relationship between the outfalls and field screening points in Table V, and between the outfalls, field screening points and HUC-12 subwatersheds in Table II.
Section 1.10	Parts VIII.B.1.d (page E-23)	Section 1.10 of the IMP should specify that for stormwater outfall monitoring, other parameters in Table E-2 identified as exceeding the lowest applicable water quality objective in the nearest downstream receiving water monitoring station will be monitored.
Table XIV	Attachment G Part VIII (page G-17)	Table XIV - Municipal Action Levels in the IMP is missing Mercury from the list (0.32 µg/L).
Section 1.17		In Section 1.17 Part I, the City states that it will utilize the definition in Attachment A, which defines the wet season as the time period between October 1 <sup>st</sup> and April 15 <sup>th</sup> to simplify the wet weather definition. However, wet season and wet weather are

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		<p>different concepts. The City must use a definition of wet weather that is consistent with the TMDLs to which it is subject. Therefore, revise the IMP to delete the statement that the City will utilize the “wet season” definition in Attachment A to trigger wet weather sampling events.</p> <p>Section 1.17 Part III of the IMP references the wet weather definition for Dominguez Channel. The City of Irwindale does not fall within the Dominguez Channel watershed. Therefore, this definition should be deleted. Part I of Section 1.17 already references the appropriate wet weather definitions for the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL and the Los Angeles River Watershed Metals TMDL to which the City is subject.</p>
Section 1.17		<p>Section 1.17 Part III includes three different methods for compositing samples. Please revise the IMP to include one protocol for compositing samples. The protocol included in the first bullet under Part III is consistent with the protocol in Attachment E of the permit.</p>
<b>Non-Storm Water Outfall Based Monitoring</b>		
Section 1.5	Part IX.B.2 (page E-24)	<p>Section 1.5 of the IMP states that there will be no further assessment reported in the inventory database if no flow is observed on at least 4 out of 5 visits. As per Part IX.B.2, the City must conduct at least one re-assessment of its non-stormwater outfall-based screening and monitoring program during the term of the LA County MS4 Permit. Where changes are needed, the City shall make the changes in its written program documents, implement these changes in practice, and describe the changes within the next annual report.</p>
Section 1.5		<p>Section 1.5 of the IMP states that “outfalls will be monitored two additional times, after a 72 hour rain event.” Please correct this statement to indicate that the field screening events will take place during dry weather, i.e., on days with &lt; 0.1 inch of rain and no less than 72 hours after a rain event. The IMP also states elsewhere that there will be 5 site visits. Please clarify the <i>screening frequency</i> for identifying significant non-stormwater discharges as separate from the <i>monitoring frequency</i> for monitoring the significant non-stormwater discharges that cannot be eliminated through the source identification process and implementation of the City’s IC/ID elimination program.</p>
Section 1.5	Part IX.C.1 (page E-24 to	<p>The IMP should be more specific on how a significant non-stormwater discharge will be determined. In particular, it should</p>

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
	E-25)	provide greater specificity on thresholds for field measurements, including flow and water quality data that will be used to determine whether the non-stormwater discharge is significant.
Section 1.5	Attachment A (page A-11)	<p>The IMP states that for the field screening of non-stormwater outfall discharges, “outfalls greater than or equal to 36 inches in diameter will be located and mapped using GIS”.</p> <p>The criteria for screening of non-stormwater outfall discharges should follow the definition of major outfalls: “Major municipal separate storm sewer outfall (or “major outfall”) means a municipal separate storm sewer outfall that discharges from a single pipe with an inside diameter of 36 inches or more or its equivalent (discharge from a single conveyance other than circular pipe which is associated with a drainage area of more than 50 acres); or for municipal separate storm sewers that receive storm water from lands zoned for industrial activity (based on comprehensive zoning plans or the equivalent), an outfall that discharges from a single pipe with an inside diameter of 12 inches or more or from its equivalent (discharge from other than a circular pipe associated with a drainage area of 2 acres or more). (40 CFR § 122.26(b)(5))”.</p>
Section 1.5	Part IX.G.2 & IX.G.3 (page E-28)	The IMP should specify that non-stormwater outfall monitoring of significant non-stormwater discharges that cannot be eliminated will occur 4 times during the year following source identification, or at the frequency identified in a TMDL Monitoring Plan if an outfall is subject to dry weather TMDLs.
Section 1.5	Part IX.G.4 & IX.G.5 (page E-28)	<p>The IMP states that, “monitoring frequency will be reduced to twice per year beginning the second year of monitoring if pollutant concentration during the first year do not exceed WQBELs or water quality standards on the 303(d) list for the receiving water.” Pollutant concentrations must also be compared to Non-stormwater Action Levels before requesting any reduction in monitoring frequency during the second year of monitoring.</p> <p>Please note that per Part IX.G.5 of the LA County MS4 Permit, following one year of monitoring, the City may submit a written request to the Executive Officer of the Regional Water Board to reduce or eliminate monitoring of specified pollutants, based on an evaluation of the monitoring data.</p>
Section 1.5		<p>In the last paragraph in Section 1.5 of the IMP, please correct the following typographical errors:</p> <ul style="list-style-type: none"> <li>• Outfalls should be monitored for constituents identified in</li> </ul>

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		Attachments O and P of the LA County MS4 Permit. <ul style="list-style-type: none"> <li>Last sentence: correct "acute toxicity" to "aquatic toxicity".</li> </ul>
Section 1.13		Delete the statement that the City does not intend to conduct action level or any other non-stormwater monitoring at the outfall as this is inconsistent with permit requirements.
Section 1.13		Please add a title to the first table in Section 1.13 of the IMP.
Section 1.13	Attachment G Part II & VI (page G-3 to G-5 and G-10-G13)	Tables under Section 1.13 of the IMP list the Action Levels for the Los Angeles River Watershed and the San Gabriel River respectively. However, the tables included in Section 1.13 appear to be those applicable to brackish or saltwater, while those that should be referenced are those pertaining to freshwater (i.e., Tables G-5 and G-21 of Attachment G of the permit).
Section 1.17	Part IX.H.2 (page E-28)	The IMP should state that flow-weighted composite samples shall be taken for a non-stormwater discharge using a continuous sampler or it shall be taken as a combination of a minimum of 3 sample aliquots, taken in each hour during a 24-hour period unless an alternate protocol is proposed with justification and ultimately, approved by the Regional Water Board.
<b>Aquatic Toxicity</b>		
Section 1.9		The IMP states that the "City will collect and analyze grab samples taken from receiving water monitoring locations to evaluate the extent and cause of toxicity in the receiving water". The revised IMP must clearly state which receiving water monitoring stations will be used to test for aquatic toxicity.
Section 1.9.1 & 1.9.2		Please correct typographical error in the IMP for titles of Section 1.9.1 and 1.9.2: "Spices" to "Species".
Section 1.9.2	Part XII.G (page E-31 to E-32)	Section 1.9.2 of the IMP references the Dominguez Channel Watershed data to support the selection of <i>C. dubia</i> as a freshwater species for aquatic toxicity testing. The City of Irwindale is located in the Los Angeles River and the San Gabriel River watershed. Section 1.9.2 should be revised accordingly to include a test species for Los Angeles River and San Gabriel River by either including test species sensitivity screening or choosing a test species on the basis of previous monitoring data and studies.
Section 1.9.3 (page 17)		Section 1.9.3 of the IMP lists US EPA guidance documents in the last sentence of the 1 <sup>st</sup> paragraph. The IMP should add " <i>Methods for Aquatic Toxicity Identification Evaluations, Phase III Toxicity Confirmation Procedures for Samples Exhibiting Acute and Chronic Toxicity (EPA/600/R-92/081, 1993)</i> " to the list of US EPA guidance documents.
Section 1.9.4	Part VIII.B.1.c.vi	Revise IMP to state that, if a toxicant or class of toxicants could not be conclusively identified through a TIE conducted on the receiving

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
	(page E-23)	water sample, the City will conduct toxicity testing at the outfall at the next sampling event during the same condition (i.e., either wet weather or dry weather) in which the toxicity was observed in the receiving water.