

---

## Los Angeles Regional Water Quality Control Board

August 11, 2014

Mr. Steve R. Burrell  
Interim City Manager  
City of Rolling Hills  
2 Portuguese Bend Road  
Rolling Hills, CA 90274

Ms. Yolanta Schwartz  
Planning Director  
City of Rolling Hills  
2 Portuguese Bend Road  
Rolling Hills, CA 90274

### **REVIEW OF INTEGRATED MONITORING PROGRAM DEVELOPED PURSUANT TO THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)**

Dear Mr. Burrell and Ms. Schwartz:

On December 5, 2013, the California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board) outlined the monitoring program that the City of Rolling Hills shall implement individually and the monitoring that shall be conducted as part of the Palos Verdes Peninsula Coordinated Integrated Monitoring Program (CIMP). On December 27, 2013, the Regional Water Board received the City of Rolling Hills (City) integrated monitoring program, which outlines the non-storm water monitoring requirements that the City intends to implement individually.

As stated in the City's *Non-Storm Water Screening and Monitoring Program* (NSW MP), Rolling Hills is composed entirely of low-density, single family residential homes on large lots. The City does not have a continuous improved storm drain system. The City is a low density, rural residential community with primary drainage conveyed via natural canyons. Roadways are narrow with soft shoulders (no curb-and-gutter). Dry weather flows and small rainfall events are infiltrated within the natural soft-bottom canyons, which serve as the primary drainage system. Since there is no developed storm drain system within the City, as stated in the NSW MP the City will focus non-storm water monitoring efforts on the natural canyons that serve as the primary drainage network in the City. Throughout the NSW MP the term "outfall," as used by the City, refers to the selected monitoring locations within the City's canyons.

Regional Water Board staff has reviewed the City's NSW MP for compliance with the requirements of Attachment E, Part IX of the MS4 Permit and has the following comments.

1. Page 3, section 2.1 reference to “non-exempt or conditionally non-exempt non-storm water discharges” is unclear. The passage should read “(a) non-exempt non-storm water discharges or (b) conditionally exempt non-storm water discharges...” or something similar.
2. Page 3, section 2.2, the justification for not screening canyons with natural flows does not consider the fact that the natural flows may be augmented by other anthropogenic non-storm water discharges that could either be non-exempt discharges or conditionally exempt discharges. The screening should consider this possibility and link to dry weather receiving water monitoring such that this possibility would be evaluated (i.e., these canyons would be screened) if necessary in the future based on dry weather receiving water monitoring and source assessment.
3. Page 4, section 2.2, two non-storm water screenings during summer dry weather is inadequate. Non-storm water discharges may also be present during winter dry weather. Therefore, at a minimum, conduct quarterly non-storm water screenings during each season (i.e. summer, fall, winter and spring) to establish a baseline. If after four dry weather screenings, no significant non-storm water discharges were present at a particular monitoring location, then no further action is necessary.
4. Page 5, section 2.4, the source identification schedule meets the minimum requirements as listed in the MS4 Permit; however, given that the City will only be screening five canyons in total, the City should consider an alternative schedule more appropriate to the City’s limited number of major “outfalls.”
5. Page 6, section 2.5, part A., if the source is determined to be an illicit connection or illicit discharge, then the procedures must include steps to eliminate the discharge consistent with the IC/ID requirements, which may require monitoring; actions to eliminate the source (e.g., progressive enforcement); and if the actions to eliminate the source are unsuccessful, identification and implementation of a permanent solution.
6. Page 6, section 2.5, part B shall apply to “Authorized or conditionally exempt essential non-storm water discharges,” pursuant to Attachment E, Section IX.F.2 on page E-26 of the LA County MS4 Permit. In addition, if there are any non-MS4 NPDES permits for discharges within the City, then please provide an inventory of these NPDES permits, which includes the discharge locations and receiving waters.
7. Page 6, section 2.5, part C shall include conditionally exempt, but non-essential, non-storm water discharges pursuant to Attachment E, Section IX.F.3 on page E-27 of the LA County MS4 Permit.
8. Page 7, section 2.6, please revise to state that procedures outlined in the Permit, Attachment E, Part IX.G will be followed.
9. Page 7, Part 3, there needs to be a discussion, as appropriate, of the monitoring that is being conducted per the Santa Monica Bay (SMB) Nearshore and Offshore Debris TMDL, the Machado Lake Pesticides and PCBs (Toxics) TMDL, and the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL. The SMB Debris TMDL monitoring discussion should include the approach that the City is taking, which was approved by the Regional Water Board on September 3, 2013. The Machado Lake Toxics TMDL monitoring and reporting plan was conditionally approved on August 2, 2013, and Phase I monitoring was required to begin during the 2013-14 storm season. The

Greater Harbor Waters Regional Monitoring Coalition's Coordinated Compliance, Monitoring and Reporting Plan was approved by the Regional Water Board on June 6th of this year.

10. Page 7, section 3.1, please correct the reference to approval of the *Palos Verdes Peninsula Coordinated Monitoring Plan* to "approved by the Executive Officer of the Regional Board."
11. Pages 8 through 11, section 3.2, Santa Monica Bay Beaches Bacteria TMDL monitoring comparisons in the text and Tables 1 and 2 should be to the allowable number of exceedance days for monitoring location SMB 7-5 based on the antidegradation standard, to which site SMB 7-5 is subject, not to the reference beach.
12. Page 9, section 3.2.1, instead of comparing summer of 2005 through June 2013 to the reference beach (see comment above), the language should be revised to read, "From the summer of 2005 through June of 2013 exceedances were identified in only two of the nine summers (2009 and 2011)." Similarly, the conclusions in the next sentence should be reframed (e.g., "No exceedances beyond the allowable number of exceedance days occurred in the winter dry weather periods from 2005-06 through 2012-13.")
13. Page 12, section 3.3, for the Machado Lake Trash TMDL monitoring clarify and document in the last paragraph that the data demonstrate that the City has reduced its generated trash by 100% from its baseline of 7,004 gallons of trash per year. In addition on page 12, please define "RHCA."
14. In Attachment A, Screening Locations, please include for each location the receiving water name and the closest receiving water monitoring station.
15. In Attachment B, Field Data Sheet, include the following items:
  - a. The receiving water and closest receiving water monitoring station;
  - b. The closest accessible street address;
  - c. In section "Non-Storm Water Discharge Observed" also include "Ponding", "Wetted Soil" and "Flow dissipated within \_\_\_ feet;" and,
  - d. In section "Other Noticeable Characteristics of Flow" please use the "Water Conditions" from the *Updated Monitoring and Reporting Plan and Quality Assurance Project Plan for Combined Machado Lake Nutrient and Toxics Total Maximum Daily Load Sampling, Palos Verdes Peninsula CMP*, Appendix B, Field Data Sheet for consistency of data collection.
16. Include in a database an estimate of the drainage area upstream of the observation points, the receiving water, and the closest receiving water monitoring station.

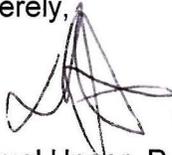
The City is required to incorporate the comments listed above into the City's NSW MP and submitted a final monitoring program by September 5, 2014, for approval by the Executive Officer of the Regional Water Board.

The Regional Water Board is implementing a Paperless Office system to reduce our paper use, increase efficiency, and provide a more effective way for our staff, the public and interested parties to view water quality documents in electronic form. To that end, please submit the revised monitoring program electronically as a Microsoft Word document or a searchable Portable Document Format (PDF) to: [losangeles@waterboards.ca.gov](mailto:losangeles@waterboards.ca.gov) with the subject line "LA

County MS4 Permit – Rolling Hills Non-Storm Water Screening and Monitoring Program.” In addition, a copy of the monitoring program should be sent to Ms. Rebecca Christmann.

If you have any questions, please contact Mr. Ivar Ridgeway, Storm Water Permitting, at [Ivar.Ridgeway@waterboards.ca.gov](mailto:Ivar.Ridgeway@waterboards.ca.gov) or by phone at (213) 620-2150 or Ms. Rebecca Christmann at [Rebecca.Christmann@waterboards.ca.gov](mailto:Rebecca.Christmann@waterboards.ca.gov) or by phone at (213) 576-6786.

Sincerely,



*Chief Deputy EO.*

Samuel Unger, P.E. *for*  
Executive Officer

cc: Andy Winje, Representative Palos Verdes Peninsula Watershed Group  
Kristen James, Heal the Bay  
Liz Crosson, Los Angeles Waterkeeper  
Steve Fleischli, Natural Resources Defense Council  
Jennifer Fordyce, Office of Chief Counsel, State Water Board  
Kathleen McGowan, Geosyntec Consultants  
Chris Wessel, Geosyntec Consultants