CALIFORNIA
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SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

February 10, 2015

Rio Hondo/San Gabriel River Water Quality Group
(See Distribution List)

REVIEW OF THE RIO HONDO / SAN GABRIEL RIVER WATER QUALITY GROUP'S DRAFT COORDINATED INTEGRATED MONITORING PROGRAM, PURSUANT TO PART VI.B AND 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 Rio Hondo/San Gabriel River Water Quality Group:

The Regional Water Board has reviewed the draft Coordinated Integrated Monitoring Program (CIMP) submitted on June 27, 2014 by the Rio Hondo / San Gabriel River Water Quality Group (RH/SGRWQG). This 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, in coordination with an approved Watershed Management Program per Part VI.C, a customized monitoring program 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. Customized monitoring programs may be developed on an individual jurisdictional basis, referred to as an Integrated Monitoring Program (IMP), or on a watershed basis, referred to as a CIMP. These programs must be approved by the Executive Officer of the Regional Water Board.

The Regional Water Board has reviewed the draft CIMP and has determined that, for the most part, the CIMP includes the elements set forth in Part II.E and will achieve the Primary Objectives set forth in Part II.A of Attachment E of the LA County MS4 Permit. However, some additions and revisions to the CIMP are necessary. The Regional Water Board's comments on the CIMP, including detailed information concerning necessary additions and revisions to the CIMP, are found in Enclosure 1 and Enclosure 2.

Please make the necessary additions and revisions to the CIMP as identified in the enclosures to this letter and submit the revised CIMP as soon as possible and no later than **May 11, 2015.** The revised CIMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised RH/SGRWQG CIMP" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Chris.Lopez@waterboards.ca.gov.

Upon approval of the revised CIMP by the Executive Officer, the Permittees must prepare to commence their monitoring program within 90 days. If the necessary revisions are not made, the Permittees must comply with the Monitoring and Reporting Program (MRP) and future revisions thereto, in Attachment E of the LA County MS4 Permit.

Until the Permittees' CIMP is approved by the Executive Officer, the monitoring requirements pursuant to Order No. 01-182 and MRP CI 6948, and pursuant to approved TMDL monitoring plans shall remain in effect for the Permittees.

If you have any questions, please contact Mr. Chris Lopez of the Storm Water Permitting Unit by electronic mail at Chris.Lopez@waterboards.ca.gov or by phone at (213) 576-6674. 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

Samuel Unger, P.E.
Executive Officer

Enclosures:

Enclosure 1 – Summary of Comments and Necessary Revisions to Draft CIMP
Enclosure 2 – Comments on Aquatic Toxicity Testing
Rio Hondo/San Gabriel River Water Quality Group Distribution List

Enclosure 1 – Summary of Comments and Necessary Revisions to Draft CIMP

Rio Hondo/San Gabriel River Water Quality Group

CIMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
Receiving Water Monitoring		
Section 1.2 (Water Quality Priorities)	Part VI.B	Since submittal of the draft CIMP, the revised *LA River Nitrogen Compounds and Related Effects TMDL* became effective on August 7, 2014. Table 1-2 (page 2) and any applicable parts of the CIMP should be updated accordingly.
Section 2 (Receiving Water Monitoring – Nitrogen)	Part VI.C.1.d.ii	Receiving water monitoring at the Rio Hondo Reach 3 LTA site should include ammonia, nitrate-N, nitrite-N, and nitrate + nitrite at a minimum frequency of three wet weather events and two dry weather events per year. These constituents have receiving water limitations derived from the *Los Angeles River Nitrogen Compounds and Related Effects TMDL*.
Section 2 (Table E-2 Screening)	Part VI.C.1.e; Part VI.D.1.d	The Group should specify that Table E-2 screening will occur during the first significant rain event and during the critical dry weather event of the first year.
Section 2.3.1 (Receiving Water Monitoring – SGR Reach 5)	Part VI.B.1.c	The draft CIMP notes on page 13 that no Long Term Assessment monitoring site is being proposed for San Gabriel River Reach 5 because of low flows (due to infiltration) within the reach. Instead, the Group proposes to assess San Gabriel River Reach 5 through its outfall monitoring of the outfalls at Beatty Canyon and Bradbury Drain. The Group should either include receiving water monitoring for this reach or provide additional justification for its outfall monitoring proposal, including what percentage of the MS4 drainage area to San Gabriel River Reach 5 is served by these two outfalls.
Section 2.3.2 (Harbor Toxics TMDL Monitoring)	Part VI.B.2	The draft CIMP notes on page 17 that Harbor Toxics TMDL monitoring requirements for the Los Angeles River and San Gabriel River will be satisfied through coordination with downstream groups. For clarity, the revised CIMP should directly cite which WMP/EWMP Groups and/or agencies will conduct the monitoring and which CIMPs address the monitoring requirements. The revised CIMP should also include copies of the agreements between the Group and the other WMP/EWMP Groups to coordinate the required

		monitoring at the mouths of the LA and San Gabriel Rivers.
Section 2.3.2 (Peck Road Park Lake TMDL Monitoring)	Part VI.B.2	The draft CIMP states on page 17 that the exact location of the Peck Road Park Lake TMDL monitoring site may vary due to hydrologic conditions affecting lake levels and the type of monitoring being conducted. Attachment B (page 95) lists that the latitude and longitude of this monitoring site varies. The revised CIMP should be more specific on locations for lake monitoring and how locations may vary based on conditions. Additionally, any lake sampling procedures should be included in Attachment E and referenced.
Section 2.4 (Receiving Water Monitoring Frequency)	Part VI.C.1.a	The frequency for monitoring applicable parameters under the San Gabriel River Metals TMDL should be increased to four wet weather events to be consistent with the recommendations established in that TMDL. Wet-weather monitoring results from the first year may be evaluated to determine whether reducing the frequency to three wet-weather events per year would still provide sufficient data. The Group may request a reduction in frequency on the basis of this data evaluation.
Outfall Monitoring		
Section 4.2 (Stormwater Outfall Monitoring Sites)	Part VIII.A.2.b	The proposed outfall monitoring site for the Santa Anita Wash HUC-12 is estimated to drain an area that is 95% residential and 4% commercial. However, the land use within the entire HUC-12 is 52% residential and 38% commercial. Overall, commercial land use is consistently under-represented in selected outfalls. The revised CIMP should consider selecting an outfall with higher commercial land use in its drainage area or provide further justification why the proposed location is suitable in comparison to alternative outfalls within the HUC-12 that may be more representative of land uses.
Section 4.3 (Stormwater Outfall Monitoring)	Part VIII.B; Part VIII.C	Table 4-11 (page 36) should include monitoring for ammonia, nitrate-N, nitrite-N, and nitrate + nitrite for Arcadia Wash and Sawpit Wash. Table 4-11 should also include the potential monitoring frequency for toxicity, or other relevant pollutants, resulting from a toxicity identification evaluation. The CIMP should also clarify if samples will be collected in the first 24 hours of stormwater discharge or for an entire stormwater discharge if less than 24 hours.
Section 5.2 (NSW Outfall Screening)	Part IX.C.1	The revised CIMP should specify a threshold to be used to determine significant non-stormwater discharges in the San Gabriel River watershed.
Section 5.6.2 (NSW Outfall	Part IX.G.1.c	Table 5-5 (page 48) lists constituents for Non-Stormwater Outfall Monitoring. Sawpit Creek monitoring should include DEHP since this

Monitoring Constituents)		constituent is currently listed on the 303(d) list.
General		
Attachment E (Weather Conditions)	Part VI.C.1.b	The revised CIMP should incorporate wet weather definitions from approved TMDLs. For example, the *Los Angeles River and Tributaries Metals TMDL* defines wet weather as when the maximum daily flow is equal to or greater than 500 cfs at the LA River Wardlow gage station and the *San Gabriel River and Impaired Tributaries Metals and Selenium TMDL* defines wet weather as when the maximum daily flow in Reach 2 of the San Gabriel River is greater than or equal to 260 cfs. If the Group chooses to use an alternate definition, the CIMP should provide support for its consistency with the applicable TMDL definitions, above.
Section 10.2 (Adaptive Management)	Part VI.C; Part VI.D; Part VIII.B; Part IX.G	The draft CIMP notes on page 55 that 303(d) constituent monitoring will be discontinued when sufficient data are available to support delisting. Additionally, the draft CIMP notes that monitoring of any non-TMDL, non-303(d) constituent will be discontinued if there are two consecutive monitoring events for the same condition with no exceedances observed. The CIMP needs to be revised to clarify that any such reduction in monitoring, including elimination of parameters from the monitoring program, would need to be proposed to the Regional Water Board and would be subject to Executive Officer approval.
Section 12 (CIMP Implementation Schedule)	Part VI.B	The CIMP implementation schedule on pages 63-64 includes a schedule of installation of receiving water and outfall monitoring sites. However, it is not clear when wet weather monitoring will commence at these locations. The revised CIMP should clearly specify when wet-weather monitoring is anticipated to begin at each monitoring location.

ENCLOSURE 2
COMMENTS ON AQUATIC TOXICITY TESTING
RIO HONDO/SAN GABRIEL RIVER CIMP

Part XII.G.1. (Page E-30) and Part XII.G.2. (Page E-30) of the Monitoring and Reporting Program states that Permittees shall conduct aquatic toxicity monitoring utilizing the critical life stage chronic toxicity test methods listed. The draft CIMP does not propose use of critical life stage chronic toxicity test methods for assessment of toxicity in wet weather samples and instead proposes use of acute toxicity test methods. This is not acceptable; the appropriate chronic toxicity test method listed in the MRP must be used and both survival and sublethal endpoints must be reported. We suggest the group consult the State Water Resources Control Board 2011 publication, "Implementation Guidance: Toxicity Testing for Stormwater" to gain insight on how to run chronic toxicity tests on wet weather samples.

Part XII.I.1. (Page E-33) of the Monitoring and Reporting Program states that a toxicity test sample is immediately subject to TIE procedures if either survival or sublethal endpoints demonstrate a Percent Effect value equal to or greater than 50% at the Instream Waste Concentration. The draft CIMP does not propose to perform a TIE when at least a 50% sublethal effect is seen but instead proposes to first collect a confirmatory sample two weeks later.

This is not an acceptable approach. The CIMP seems to be implying that chronic toxicity has some inherent non-persistent quality to it that makes the results unreliable. It also implies that chronic toxicity is of lesser importance. Although it would be hard to generalize to all possible situations, the fact that a large number of invertebrates (or fish) living in a receiving water can survive an ambient pollutant concentration but are impacted in terms of growth or reproduction means that the population as a whole will be impacted, and could eventually collapse. Some species living in the receiving water have very short lifespans and during critical times of the year may be prey for other organisms that will in turn be impacted by their population decline.

Suggested Special Study: The 2013 study released by the California Stormwater Quality Association (CASQA) entitled "Review of Pyrethroid, Fipronil and Toxicity Monitoring Data from California Urban Watersheds" reviewed stormwater data from studies conducted during 2005 - 2012 and highlighted the toxicity impacts from use of pesticides not currently required to be monitored for by the MRP. We suggest the group begin monitoring for these chemicals in the receiving water and, in addition, assess toxicity using the 2002 acute toxicity testing protocol (EPA-821-R-02-012) with the amphipod *Hyalella azteca* as the test organism. *H. azteca* is known to be much more sensitive to pyrethroids than is *Ceriodaphnia dubia* while the latter is useful for its sensitivity to OP pesticides. The two species together may also prove to be more useful in detecting toxicity from fipronil. And, should 50% or greater effect be detected in the toxicity test, we suggest a procedure to incorporate pyrethroids into the subsequent TIE be documented (three possible treatments have been identified by researchers, see http://www.pubfacts.com/detail/20018342/Focused-toxicity-identification-evaluations-to-rapidly-identify-the-cause-of-toxicity-in-environment). While fipronil does not have a TIE procedure identified currently, chemical testing for the parameter (and degradates) and comparison to U.S. EPA Office of

Pesticide Program's aquatic life benchmarks at http://www.epa.gov/oppefed1/ecorisk_ders/aquatic_life_benchmark.htm will aid in determining the cause(s) of toxicity in order to follow up with outfall testing of the parameter(s) with the ultimate goal of removing the source. This approach will also help minimize inconclusive TIE results which would lead to required toxicity testing in the representative upstream outfall(s).

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