



Los Angeles Regional Water Quality Control Board

December 8, 2014

Ms. Mary Rooney  
Community Services Division  
City of Walnut  
21201 La Fuente Road  
Walnut, CA 91789

**REVIEW OF THE CITY OF WALNUT'S DRAFT INTEGRATED MONITORING PROGRAM, PURSUANT TO PART VI.B AND 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 Ms. Rooney:

The Regional Water Board has reviewed the draft Integrated Monitoring Program (IMP) submitted on June 28, 2014 by the City of Walnut. 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 a on 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 IMP and has determined that, for the most part, the IMP 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 IMP are necessary. The Regional Water Board's comments on the IMP, including detailed information concerning necessary additions and revisions to the IMP, are found in Enclosure 1.

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 **March 8, 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 – Revised Walnut IMP" with a copy to [Ivar.Ridgeway@waterboards.ca.gov](mailto:Ivar.Ridgeway@waterboards.ca.gov) and [Chris.Lopez@waterboards.ca.gov](mailto:Chris.Lopez@waterboards.ca.gov).

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | [www.waterboards.ca.gov/losangeles](http://www.waterboards.ca.gov/losangeles)



Upon approval of the revised IMP by the Executive Officer, the City must prepare to commence its monitoring program within 30 days. If the necessary revisions are not made, the City must comply with the Monitoring and Reporting Program (MRP) and future revisions thereto, in Attachment E of the LA County MS4 Permit.

Until the Permittee's IMP 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 Permittee.

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

Sincerely,



Samuel Unger, P.E.  
Executive Officer

Enclosures:

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

cc: Robert Wishner, City of Walnut  
Melissa Barcelo, City of Walnut  
Cody Howing, Assistant Engineer, RKA Consulting Group

Los Angeles Regional Water Quality Control Board

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

City of Walnut

IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
<b>Receiving Water Monitoring</b>		
Section 2.0 (RW Monitoring Location)	Part VI.A	<p>The City relies upon receiving water monitoring data from mass emission station S14. However, this site is located in San Gabriel River Reach 2, far downstream of the City’s MS4 discharges into San Jose Creek Reach 1 and Walnut Creek. The draft IMP does not provide an explanation how and why this location will be representative of MS4 discharges nor how the City is contributing to the monitoring at this station.</p> <p>The City should consider monitoring at a site upstream of S14 that can be used to determine whether receiving water limitations are being met. In particular, the City is subject to a TMDL WLA for selenium in San Jose Creek Reach 1.</p> <p>The City may consider coordinating with other agencies or adjacent WMP and EWMP groups to utilize proposed RW monitoring sites that are located in San Jose Creek and Walnut Creek, closer to the City’s MS4 discharges. Potential sites may include Los Angeles County Sanitation Districts’ receiving water monitoring sites, tributary monitoring sites established under the 2001 LA County MS4 Permit, or new monitoring sites established by other MS4 Permittees.</p>
Section 2.1 (Metals TMDL Monitoring)	Part VI.C and Part VI.D	<p>The draft IMP indicates on pages 11 and 12 that monitoring for lead and selenium will include monitoring of three wet weather events per year instead of the minimum of four events recommended in the TMDL.</p> <p>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 listed 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 City may request a reduction in frequency on the basis of</p>

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		<p>this data evaluation.</p> <p>On page 12, the draft IMP cites the wet weather conditions described in the MS4 Permit. The City should note and use the TMDL definition of wet weather conditions included in the San Gabriel River Metals TMDL (260 cfs flow in San Gabriel River Reach 2) and target wet weather events that fit this definition.</p>
<p>Section 2.1 (Harbor Toxics TMDL Monitoring)</p>	<p>Part VI.C and Part VI.D</p>	<p>As a responsible party under the San Gabriel River Metals TMDL, the City is also responsible for conducting water and sediment monitoring at the mouth of the San Gabriel River under the <i>Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL</i>. See Table K-13, footnote 2 in the LA County MS4 Permit. The monitoring program requirements can be found in the Basin Plan (Basin Plan, Chapter 7, Section 7-20, Table 7-20.1 "Monitoring") or page 27 of Attachment A to Resolution No. R11-008:</p> <ul style="list-style-type: none"> <li>- <b>Water Column Monitoring</b>                      Water samples and total suspended solids samples shall be collected at, at least one site during two wet weather events and one dry weather event each year. The first large storm event of the season shall be included as one of the wet weather monitoring events. Water samples and total suspended solid samples shall be analyzed for metals, DDT, PCBs, and PAHs. Sampling shall be designed to collect sufficient volumes of suspended solids to allow for analysis of the listed pollutants in the bulk sediment. <p>General water chemistry (temperature, dissolved oxygen, pH, and electrical conductivity) and a flow measurement shall be required at each sampling event. General chemistry measurements may be taken in the laboratory immediately following sample collection if auto samplers are used for sample collection or if weather conditions are unsuitable for field measurements.</p> </li> <li>- <b>Sediment Monitoring</b>                      For sediment chemistry, sediment samples shall be collected at, at least one site every two years for analysis of general sediment quality constituents and the full chemical suite as specified in SQO Part 1. All samples shall be collected in accordance with SWAMP protocols.</li> </ul>



IMP Reference	MRP Element/ Reference (Attachment E)	Comment and Necessary Revision
		<p>The details of the monitoring program including sampling locations and all methods shall be specified in the MRP to be approved by the Executive Officer.</p> <p>Section 2.1 of the revised IMP should address how the City will fulfill this requirement individually or in collaboration with other Permittees within the San Gabriel River watershed.</p> <p>It also should be noted that monitoring for PCBs in sediment or water under this TMDL 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. It is preferable samples be analyzed using EPA Methods 8270 or 1668C (as appropriate), and High Resolution Mass Spectrometry.</p>
<p>Sections 2.2 and 2.3 (Receiving Water Monitoring Requirements)</p>	<p>Part VI.C and Part VI.D</p>	<p>For clarity, Table 2-2 (page 12) should incorporate and distinguish between monitoring frequencies for parameters in wet weather and in dry weather and indicate the monitoring location(s).</p> <p>As noted above, mass emissions station S14 is located far downstream of the City. Receiving water monitoring sites located on San Jose Creek and Walnut Creek would be more appropriate. Upon identifying more appropriate receiving water monitoring sites, the City should also re-evaluate the list of monitoring parameters to ensure that all applicable TMDL and 303(d)-listed parameters for that waterbody are included.</p>
<p>Sections 2.2, 2.3, and 3.6 (Bacteria Monitoring)</p>	<p>Part VI.C, Part VI.D, Part VIII.B, and Part IX.G</p>	<p>The draft IMP correctly identifies coliform and indicator bacteria as 303(d) impairments and correspondingly categorizes coliform bacteria as a category 2 pollutant.</p> <p>However, the City should modify its IMP to monitor for <i>E. coli</i> to be consistent with current freshwater bacteria objectives contained in the <i>Water Quality Control Plan for the Los Angeles Region</i> in which <i>E. coli</i> is used instead of fecal coliform.</p> <p>Receiving water and outfall monitoring parameters in Table 2-2 (page 12) and Table 3-6 (page 21) should be revised to include monitoring for <i>E. coli</i> where there is a bacteria 303(d) listing.</p>
<p><b>Outfall Monitoring</b></p>		

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Section 3.0 (Storm Drains, Channels and Outfalls Map(s) and/or Database	Part VII.A	<p>All completed mapping information as listed in Part VII.A of the MRP should be included and submitted in the revised IMP. Furthermore, the IMP should clearly note where each of these items are located within the IMP.</p> <p>Additionally, the land uses on Figure 1-2 (page 4) are hard to view since "Residential or Other Land Use" is transparent. It is also unclear what constitutes "Other Land Use."</p>
Section 3.1.1 (Outfall Monitoring Locations)	Part VIII.A.2.a	<p>In Section 3.1.1 (page 21) the draft IMP proposes to monitor only two outfall locations, instead of the three needed to monitor each HUC 12 subwatershed within the City's jurisdiction. The City states that this is an "attempt to maximize available funds for monitoring and minimize redundant data collection." The City will consider the third outfall location for potential monitoring at a later date. Given the information provided by the City in its IMP, this approach appears acceptable.</p> <p>The draft IMP justifies each of its proposed outfall monitoring locations by comparing drainage area land uses to land uses for the entire City of Walnut. However, since outfall monitoring establishes monitoring of at least one major outfall per HUC 12 subwatershed, the draft IMP's comparisons could be improved by including a comparison of land uses for each outfall monitoring location to the City's land uses within the corresponding HUC-12 subwatershed.</p> <p>Further, Section 3.1.1 should include pictures of the monitoring locations and map(s) of the corresponding catchment areas.</p>
Section 3.1.1 (Outfall Location M1)	Part VIII.A.2.e	<p>Section 3.1.1 (page 16) of the draft IMP indicates that outfall monitoring location M1 is located 1,500 feet north of City limits, upstream of where the reinforced concrete box merges with San Jose Creek Reach 1.</p> <p>The City needs to include justification for sampling at this location. Per Part VIII.A.2.e (page E-22) of the MRP, "[t]he specific location of sample collection may be within the MS4 upstream of the actual outfall to the receiving water if field safety or accurate flow measurement require it."</p>
Section 3.1.2 (SW Outfall Monitoring Parameters)	Part VIII.B.1.c	<p>For outfall monitoring, Table 3-6 cites section VI.C.d.vi for toxicity. This should instead reference section VIII.B.1.c.vi and indicate that monitoring at outfalls will include pollutants identified in a TIE conducted at the downstream receiving water monitoring station during the most recent sample event, or where the TIE conducted</p>

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		<p>on the receiving water samples was inconclusive, aquatic toxicity.</p> <p>Table 3-6 also does not include all 303(d) listed parameters. Since outfalls M1 and M2 discharge to San Jose Creek Reach 1, the monitoring list should include TDS for those outfall locations. Additionally, for clarity, Table 3-6 should incorporate monitoring frequencies and monitoring locations.</p> <p>On page 21, the draft IMP cites the wet weather conditions described in the MS4 Permit. The City should note and use the TMDL definition of wet weather conditions included in the San Gabriel River Metals TMDL (260 cfs flow in San Gabriel River Reach 2) and target wet weather events that fit this definition.</p>
Section 3.2.1 (Outfall Screening)	Part IX.B and Part IX.C	Section 3.2.1 (pages 22-23) of the draft IMP describes the City's outfall screening procedure and notes that the City will track outfalls with significant dry weather flow. In this section, the City should reference Part IX.C.1.d (page E-25) of the MRP and select appropriate criteria that the City will use to determine significant non-storm water discharges.
Section 3.2.1 (Inventory of MS4 Outfalls with NSW Discharges)	Part IX.D	<p>Section 3.2.1 (page 23) of the draft IMP notes the information included in field inspection reports. This information mirrors the required attributes to be included in the City's inventory of MS4 outfalls. However, based on the limited description, it is unclear whether this is consistent with the MS4 outfall inventory requirements detailed in Part IX.D.</p> <p>The revised IMP should further elaborate on this inventory and ensure consistency with MRP requirements.</p>