



## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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JAMES F. STAHL  
Chief Engineer and General Manager

October 25, 2006

*Via electronic mail*

Ms. Tam Doduc, Chair and Members  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814



Dear Chair Doduc and Members of the Board:

### **Comments on the Proposed Amendment to the Water Quality Control Plan – Los Angeles Region Incorporating the San Gabriel River and Impaired Tributaries Metals and Selenium TMDL**

The Sanitation Districts of Los Angeles County (Districts) appreciate the opportunity to provide comments on the Metals and Selenium Total Maximum Daily Load (Metals TMDL) for the San Gabriel River and Impaired Tributaries to the State Water Resource Control Board (State Board). The Districts are a confederation of 24 individual special districts providing wastewater and solid waste management services to over 5 million people in Los Angeles County, including 78 cities and unincorporated areas within the County. The implementation of this proposed TMDL would impact five Water Reclamation Plants owned and operated by the Districts as well as the Puente Hills and Spadra Landfills. The Districts have been involved with the development of this TMDL, including providing written comments<sup>1</sup> and oral comments to the Los Angeles Regional Water Quality Control Board (Regional Board) at the Board Hearing at which this TMDL was adopted in July 2006.

The Districts would like to commend the Regional Board staff for working with us to address many of our concerns before this TMDL was adopted in July 2006. The Districts had suggested modifications to a number of implementation provisions of the TMDL, and the Regional Board made many of the changes that were recommended to make implementation of the TMDL more flexible for permittees. For instance, the Districts suggested the use of allocations based on dissolved criteria, rather than totals metal concentrations, and the Regional Board staff indicated that dissolved limits were an option if specific facility permits were sought (though not in the TMDL or general permits). That notwithstanding, the Districts have a few remaining concerns that we request the State Board address before approval of this TMDL. These concerns are listed below and are discussed in greater detail in the following paragraphs:

<sup>1</sup> Hereby incorporated by reference.

### Summary of Comments

- San Gabriel River Reach 2 is not impaired for lead and the allocations associated with this pollutant should be removed from the TMDL;
- The wasteload allocations contained in this TMDL should be consistent with the findings of the State Board's Panel on Numeric Limits; and
- One of the Implementation Provisions in the TMDL is arbitrary and should be revised.

#### ***San Gabriel River Reach 2 is not impaired for lead***

In the Districts' June 19, 2006 comment letter to the Regional Board, the Districts noted that San Gabriel River Reach 2 was not impaired for lead. The Regional Board uses a different methodology to assess the data to determine whether an impairment exists. The State Board does not separate wet and dry data when determining an impairment, whereas the Regional Board does. In the State Board's Response to Comments on the 2006 Proposed Clean Water Act section 303(d) list, the State Board staff included the following statement: "Wet and dry weather data were not separated for the purposes of these assessments since the water quality objectives are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant. The Listing Policy does not contain provisions to assess a water body based upon wet and dry weather conditions." (State Water Resources Control Board, Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments, Volume IV: Response to Comments (September 2006), Comment Number 107.20, p. 99)

The fact that the data are evaluated differently notwithstanding, the reach is not impaired for lead using either the Regional Board's methodology or the State Board's methodology. (Please see Attachment 1). Lead in San Gabriel Reach 2 should be delisted and no waste load allocations (WLAs) for lead for Reach 2 or upstream reaches should be included in the TMDL. The Districts cannot stress strongly enough the importance of this delisting and WLA removal. The TMDL does not include any other WLAs for metals in wet weather for any reach of the San Gabriel River. (The only other wet weather impairments in the watershed are for 3 metals on Coyote Creek, a tributary to the estuary.) Therefore, the listing for lead for San Gabriel River Reach 2 is solely responsible for the inclusion of wet-weather WLAs for any metal for San Gabriel River. Wet-weather runoff is the most difficult source of contaminants to control. The wet weather WLAs will cause local jurisdictions to install, monitor and maintain numerous Best Management Practices (BMPs) in an attempt to meet the WLAs for lead. It should be noted that the final wasteload allocations for lead are considerably lower than the California Toxics Rule (CTR) criteria for lead because a very conservative ratio was used to convert the dissolved CTR criteria to a total metals basis). This one listing affects approximately eighteen cities in addition to unincorporated areas in the watershed. Each jurisdiction will spend significant resources (potentially millions of dollars) to attempt to achieve the WLAs even though the water body is not impaired for lead (or any other metal). Clearly, the consequences of listing a waterbody erroneously are significant and we believe that the State Board should remand the TMDL back to the Regional Board so that the lead target and wasteload allocations for Reach 2 can be removed.

Notwithstanding this, if the State Board decides not to remand the TMDL because of the possibility that a lead impairment truly exists, the Districts believe that the impairment status of the reach will be clarified through the collection of data required by the TMDL Implementation Plan. Thus, it may become universally evident and acknowledged that the reach is not impaired with respect to lead in a year or two of the sampling being initiated. However, the TMDL does not contain a reopener provision until five years from the effective date of the TMDL. At that point, many permittees will have already had to design and construct/install BMPs to meet effective or impending limits developed from TMDL

wasteload allocations. It would make much better use of limited resources if the Regional Board was required to reevaluate the impairment status of lead in Reach 2 before the planned reopener at 5 years. Thus, the Districts request that the State Board modify the Resolution to provide direction to the Regional Board to reevaluate the TMDL with respect to the lead impairment in San Gabriel River Reach 2 no later than 2 years after the effective date of the TMDL. The Districts suggest the following item be added to the Draft State Water Board Resolution dated September 29, 2006:

Following WHEREAS No. 8, add the following new Number 9:

*“9. The State Water Board finds that the listing for lead for Reach 2 for the San Gabriel River should be re-evaluated by the Los Angeles Water Board based on the results of the water monitoring program no later than two years after the effective date of the TMDL. If the results of the re-evaluation show that, for lead, Reach 2 meets the delisting criteria contained in the State Water Quality Control Policy for Developing California’s Clean Water Act Section 303(d) List, the Los Angeles Water Board shall re-open the TMDL and remove the target and wasteload allocations and all associated implementation requirements associated with lead for Reach 2.”*

(WHEREAS Nos. 9-13 should be renumbered accordingly.)

***The TMDL should be consistent with the findings of the State Board’s Panel on Numeric Limits***

In September 2005, the State Board convened a technical panel of nationally recognized experts in the NPDES storm water program. The panel was convened to discuss whether or not it is technically feasible to develop numeric limits or other quantifiable measures for inclusion in storm water permits. A final report was issued by the panel in June 2006 after the San Gabriel River Watershed Metals and Selenium TMDL had already been drafted. The Districts request the State Board consider the recommendations of the panel’s report - “The Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial and Construction Activities” (Numeric Effluent Limits Report) - in relation to this TMDL. The attainment of the wet weather WLAs in the proposed TMDL will be accomplished primarily through BMPs. However, the TMDL does not identify a design storm in order to appropriately size the BMPs. Each BMP is effective only up to a certain storm size or flow and cannot provide the same degree of protection for all storm sizes and flows. The panel’s report states on Page 6: “...there are a number of storms each year that are sufficiently large in volume and/or intensity, to exceed the design capacity volume or flow rates of most BMPs.” Later in the report (Page 10), it is stated: “The Panel acknowledged that several to more times each year, the runoff volume or flow rate from a storm will exceed the design storm volume or rate capacity of the BMP. Stormwater agencies should not be held accountable for pollutant removal from storm beyond the size for which a BMP is designed.” These recommendations underscore the need for a defined design storm above which agencies would not be held responsible for achieving allocations..

As discussed above, BMPs need to be designed for a each specific site and to accommodate a specified storm size or flow. Clearly, the BMPs required for the Districts’ Puente Hills Landfill, that is 1,365 acres, would be very different from BMPs required for a small fully paved warehouse. The TMDL should identify a design storm for compliance purposes so that dischargers can design the appropriate facilities to achieve the WLAs in the proposed TMDL. A reasonable design storm should be identified above which an NPDES permittee would not be held responsible for meeting the WLAs in the TMDL. Up to that design storm volume, there would be reasonable assurance that the TMDL targets would be met.

The Regional Board has directed staff to participate in a Wet Weather Task Force to look into stormwater issues. This Task Force has assembled a Design Storm Subcommittee, which is in the process

of evaluating hypothetical storms and their affect on in-stream water quality given the land use characteristics of the Los Angeles Region. Such an evaluation is essential to choosing and implementing functional and cost-effective BMPs. Without a defined design storm, NPDES permittees affected by the TMDL will have to arbitrarily pick a design storm size in order to design, size and implement BMPs to attempt to achieve the WLAs in the TMDL. To minimize compliance concerns, very large design storms may have to be selected (e.g. 100-year return period). Requiring that the stakeholders begin design and construction of BMPs for very large design storms is contrary to the Regional Board's emphasis on incremental implementation of BMPs in this TMDL. The Districts request that the State Board provide direction to the Regional Board to determine an appropriate design storm and not to require compliance with wet weather allocations in the TMDL before the appropriate design storm is defined and made part of the TMDL.

***One Implementation Provision is arbitrary and should be revised***

The second provision in the implementation schedule states that within one year of the effective date of the 2006 303(d) list "The Los Angeles Regional Board shall reconsider this TMDL to develop dry- and wet-weather numeric targets, WLAs and LAs for copper and zinc in San Gabriel River Reach 2 and selenium in Coyote Creek if impairments are maintained in these reaches on the final 2006 303(d) list. The Regional Board shall also revise this TMDL to include dry-weather numeric targets for lead in San Gabriel River Reach 2 and copper, lead and zinc in Coyote Creek in addition to the wet-weather targets for these pollutant-waterbody combinations already assigned in this TMDL."

The Districts are concerned about this provision and the implication that the TMDL will be reopened to add targets and wasteload allocations without the full due process normally afforded the public in a quasi-legislative action. This provision was added to the TMDL during the Regional Board hearing (after the close of public comments), and therefore the public did not have the opportunity to comment on it. Specifically, we request that the State Board direct the Regional Board to follow the normal basin planning process, including compliance with CEQA and all other applicable requirements, when reopening the TMDL in accordance with this provision. Therefore, the Districts suggest the following item be added to the Draft State Water Board Resolution dated September 29, 2006:

Following WHEREAS No. 11, add the following new Number 12:

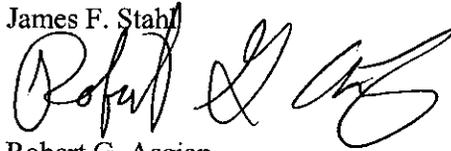
*"12. The State Water Board directs the Los Angeles Water Board to follow all applicable basin planning requirements, including compliance with CEQA requirements, if the TMDL is reopened in accordance with the 1-year reopener required in the Implementation Schedule, and encourages the Los Angeles Water Board to reconsider all changes to the 2006 303(d) list (both listings and delistings) for metals in the San Gabriel River watershed that may relate to this TMDL."*

In addition, the State Board Draft Agenda Item and Resolution contains inaccuracies. The Discussion section (and Item #5 of the Resolution) claims there are reaches of the watershed on the 303(d) list for selenium, whereas, in reality, there are no 303(d) listings for selenium in the watershed. The item also claims: "Metals and selenium listings are all subject to a consent decree between the U.S. Environmental Protection Agency (USEPA) and Heal the Bay, et. al." That statement is not correct; the consent decree contains only three metals listings for the watershed, and two have been delisted.

Thus, the Districts request that the State Board give the Regional Board direction on the issues outlined above. We appreciate your consideration of these comments and request a written response to our comments. If you have any questions concerning this letter, please contact Ms. Beth Bax at (562) 908 4288, extension 2835.

Very truly yours,

James F. Stahl

A handwritten signature in black ink, appearing to read "Robert G. Asgian". The signature is written in a cursive style with a large, stylized initial "R" and "A".

Robert G. Asgian  
Section Head

Water Quality & Soils Engineering Section

Attachments

**Summary Table of Lead Exceedances in San Gabriel River Reach 2**

Method of Assessment	wet and dry data together	number of raw data points	number of data when averaged*	exceedances of chronic standard	Impaired?
State Board		69	58	4	No
Regional Board	wet data only	61	54	4	No

\* Per the State Listing Policy, the data should be averaged over the period of time relative to the standard. Since the chronic CTR standard is based on a four-day period, data falling within a single 4-day period was Averaged.

Table 1 raw data

Table B.1: Original San Gabriel River Reach 2 lead data (dates to be averaged in gray)

site ID	date sampled	hardness	dissolved		Comments
			lead	total lead	
S14	10/14/1997	238	0	0	DRY
S14	11/10/1997	195	0	0	
S14	11/13/1997	128	0	0	
S14	11/26/1997	100	35.5	44	
S14	12/5/1997	132	18	24.6	
					data point not used because of bad hardness value
S14	1/4/1998	1	0	0	
S14	1/9/1998	120	20.4	27.9	
S14	1/29/1998	134	0	6.8	
S14	2/2/1998	120	0	7	
S14	2/6/1998	100	0	15.9	
S14	11/8/1998	230	0	0	
S14	12/6/1998	80	0	0	
S14	1/20/1999	276	0	0	
S14	1/25/1999	184	0	0	
S14	1/31/1999	280	0	0	
S14	2/6/1999	256	0	0	
S14	2/9/1999	286	0	0	
S14	3/15/1999	126	0	0	
S14	3/20/1999	265	0	0	
S14	3/25/1999	290	0	0	
S14	4/6/1999	178	0	0	
S14	4/8/1999	230	0	0	
S14	4/11/1999	110	0	0	
S14	1/26/2000	95	0	6.1	
S14	2/3/2000	170	0	0	
S14	2/12/2000	160	0	0	
S14	2/15/2000	128	0	0	
S14	2/17/2000	112	0	0	
S14	2/22/2000	95.2	0	0	
S14	2/25/2000	192	0	0	
S14	2/29/2000	230	0	0	
S14	3/7/2000	85	0	0	
S14	3/9/2000	198	0	0	
S14	10/28/2000	266	0	0	
S14	11/1/2000	190	0	5.24	
S14	1/8/2001	300	0	0	
S14	1/17/2001	160	0	0	
S14	1/26/2001	360	0	0	
S14	2/14/2001	220	0	0	
S14	2/20/2001	240	0	0	
S14	2/28/2001	140	0	0	
S14	3/6/2001	210	0	0	
S14	11/12/2001	180	0	0.77	
S14	11/27/2001	120	3.19	5.01	
S14	11/30/2001	200	10	0.59	

Table 1 raw data

site ID	date sampled	hardness	dissolved		Comments
			lead	total lead	
S14	12/3/2001	230	0.76	1.77	
S14	12/27/2001	172	0	0.77	
S14	1/31/2002	150	0	0	
S14	10/10/2002	270	0	1.38	DRY
S14	11/8/2002	210	0.67	56	
S14	12/16/2002	108	1.21	2.52	
S14	2/11/2003	80	1.55	2.16	
S14	3/15/2003	103	0	5.39	
S14	10/28/2003	210	0	104	DRY
S14	10/31/2003	260	0	6.34	
S14	12/25/2003	320	0.92	1.72	
S14	1/1/2004	305	1.46	2.14	
S14	1/13/2004	195	0	0.72	DRY
S14	10/17/2004	208	0	3.78	
S14	10/26/2004	130	0	4.42	
S14	12/5/2004	130	0	9.05	
S14	1/7/2005	124	11.4	37.5	
S14	3/17/2005	340	0	1.17	DRY
S14	6/21/2005	330	0	1.07	DRY
S14	10/17/2005	250	0	14.2	
S14	12/31/2005	112.5	0	1.01	
S14	1/14/2006	255	0	0.77	
S14	1/24/2006	250	0.71	0.94	DRY
S14	2/17/2006	220	0	1.4	
S14	4/25/2006	345	0	1.12	DRY
<b>No. Samples</b>			69		

Table 2 averaged data

Table B.2: Averaged San Gabriel River Reach 2 lead data (averaged data is shown in red font within the gray highlighted area)

site ID	date sampled	hardness	dissolved		Comments
			lead	total lead	
S14	10/14/1997	238	0	0	DRY
S14	11/10/1997	195	0	0	
S14	11/13/1997	128	0	0	
S14	11/26/1997	100	35.5	44	
S14	12/5/1997	132	18	24.6	
S14	1/4/1998	1	0	0	data point not used because of bad hardness value
S14	1/9/1998	120	20.4	27.9	
S14	1/29/1998	134	0	6.8	
S14	2/2/1998	120	0	0	
S14	2/6/1998	100	0	11.45	
S14	11/8/1998	230	0	0	
S14	12/6/1998	80	0	0	
S14	1/20/1999	276	0	0	
S14	1/25/1999	184	0	0	
S14	1/31/1999	280	0	0	
S14	2/6/1999	256	0	0	
S14	2/9/1999	286	0	0	
S14	3/15/1999	126	0	0	
S14	3/20/1999	265	0	0	
S14	3/25/1999	290	0	0	
S14	4/6/1999	178	0	0	
S14	4/8/1999	230	0	0	
S14	4/11/1999	110	0	0	
S14	1/26/2000	95	0	6.1	
S14	2/3/2000	170	0	0	
S14	2/2/2000	160	0	0	
S14	2/15/2000	128	0	0	
S14	2/17/2000	112	0	0	
S14	2/22/2000	95.2	0	0	
S14	2/25/2000	192	0	0	
S14	2/29/2000	230	0	0	
S14	3/7/2000	85	0	0	
S14	3/9/2000	198	0	0	
S14	10/28/2000	266	0	0	
S14	11/1/2000	190	0	2.62	
S14	1/8/2001	300	0	0	
S14	1/17/2001	160	0	0	
S14	1/26/2001	360	0	0	
S14	2/14/2001	220	0	0	
S14	2/20/2001	240	0	0	
S14	2/28/2001	140	0	0	
S14	3/6/2001	210	0	0	
S14	11/12/2001	180	0	0.77	

Table 2 averaged data

site ID	date sampled	hardness	dissolved		Comments
			lead	total lead	
S14	11/27/2001	120	595	2.8	
S14	11/30/2001	200			
S14	12/3/2001	230	0.76	1.77	
S14	12/27/2001	172	0	0.77	
S14	1/31/2002	150	0	0	
S14	10/10/2002	270	0	1.38	DRY
S14	11/8/2002	210	0.67	56	
S14	12/16/2002	108	1.21	2.52	
S14	2/11/2003	80	1.55	2.16	
S14	3/15/2003	103	0	5.39	
S14	10/28/2003	210	0	2.19	DRY
S14	10/31/2003	260			
S14	12/25/2003	320	0.92	1.72	
S14	1/1/2004	305	1.46	2.14	
S14	1/13/2004	195	0	0.72	DRY
S14	10/17/2004	208	0	3.78	
S14	10/26/2004	130	0	4.42	
S14	12/5/2004	130	0	9.05	
S14	1/7/2005	124	11.4	37.5	
S14	3/17/2005	340	0	1.17	DRY
S14	6/21/2005	330	0	1.07	DRY
S14	10/17/2005	250	0	14.2	
S14	12/31/2005	112.5	0	1.01	
S14	1/14/2006	255	0	0.77	
S14	1/24/2006	250	0.71	0.94	DRY
S14	2/17/2006	220	0	1.4	
S14	4/25/2006	345	0	1.12	DRY
<b>No. Samples</b>			<b>58</b>		

Table 3 averages vs CTR

Table B.3: Averaged San Gabriel River Reach 2 lead data compared to applicable CTR criteria						
date sampled	hardness	Lead acute CTR	Exceed?	Lead chronic CTR	Exceed ?	Comments
10/14/1997	238			6.4		DRY
11/10/1997	195			5.2		
11/13/1997	128			6.3		
11/26/1997	100			2.5	Yes	
12/5/1997	132			3.4	Yes	
4/4/1998	4	0		0.0		data point not used because of bad hardness value
1/9/1998	120			3.1	Yes	
1/29/1998	134			3.5		
2/2/1998	120			3.1		
2/6/1998	100			2.5		
11/8/1998	230			6.2		
12/6/1998	80			2.0		
1/20/1999	276			7.5		
1/25/1999	184			4.9		
1/31/1999	280			7.6		
2/6/1999	256			6.9		
2/9/1999	286			7.7		
3/15/1999	126			3.2		
3/20/1999	265			7.1		
3/25/1999	290			7.8		
4/6/1999	178			4.7		
4/8/1999	230			6.2		
4/11/1999	110			2.8		
1/26/2000	95			2.4		
2/3/2000	170			4.5		
2/12/2000	160			4.2		
2/15/2000	128			3.3		
2/17/2000	112			2.8		
2/22/2000	95.2			2.4		
2/25/2000	192			5.1		
2/29/2000	230			6.2		
3/7/2000	85			2.1		
3/9/2000	198			5.2		
10/28/2000	266			7.2		
11/1/2000	190			5.0		
1/8/2001	300			8.1		
1/17/2001	160			4.2		
1/26/2001	360			9.8		
2/14/2001	220			5.9		
2/20/2001	240			6.4		
2/28/2001	140			3.6		
3/6/2001	210			5.6		

Table 3 averages vs CTR

date sampled	hardness	Lead acute CTR	Exceed?	Lead chronic CTR	Exceed ?	Comments
11/12/2001	180			47		
11/27/2001	120			31		
11/30/2001	200			53		
12/3/2001	230			62		
12/27/2001	172			45		
1/31/2002	150			39		
10/10/2002	270			73		DRY
11/8/2002	210			53		
12/16/2002	108			27		
2/11/2003	80			20		
3/15/2003	103			26		
10/28/2003	210			56		DRY
10/31/2003	260			70		
12/25/2003	320			87		
1/1/2004	305			83		
1/13/2004	195			52		DRY
10/17/2004	208			55		
10/26/2004	130			33		
12/5/2004	130			33		
1/7/2005	124			32	Yes	
3/17/2005	340			93		DRY
6/21/2005	330			90		DRY
10/17/2005	250			67		
12/31/2005	112.5			29		
1/14/2006	255			69		
1/24/2006	250			67		DRY
2/17/2006	220			59		
4/25/2006	345			94		DRY
<b>Exceedances</b>			<b>0</b>		<b>4</b>	

Table 1 raw data

Table B.1: Original San Gabriel River Reach 2 lead data (dates to be averaged in gray)

site ID	date sampled	hardness	dissolved		Comments
			lead	total lead	
S14	10/14/1997	238	0	0	DRY
S14	11/10/1997	195	0	0	
S14	11/13/1997	128	0	0	
S14	11/26/1997	100	35.5	44	
S14	12/5/1997	132	18	24.6	
S14	1/4/1998	1	0	0	data point not used because of bad hardness value
S14	1/9/1998	120	20.4	27.9	
S14	1/29/1998	134	0	6.8	
S14	2/2/1998	120	0	7	
S14	2/6/1998	100	0	15.9	
S14	11/8/1998	230	0	0	
S14	12/6/1998	80	0	0	
S14	1/20/1999	276	0	0	
S14	1/25/1999	184	0	0	
S14	1/31/1999	280	0	0	
S14	2/6/1999	256	0	0	
S14	2/9/1999	286	0	0	
S14	3/15/1999	126	0	0	
S14	3/20/1999	265	0	0	
S14	3/25/1999	290	0	0	
S14	4/6/1999	178	0	0	
S14	4/8/1999	230	0	0	
S14	4/11/1999	110	0	0	
S14	1/26/2000	95	0	6.1	
S14	2/3/2000	170	0	0	
S14	2/12/2000	160	0	0	
S14	2/15/2000	128	0	0	
S14	2/17/2000	112	0	0	
S14	2/22/2000	95.2	0	0	
S14	2/25/2000	192	0	0	
S14	2/29/2000	230	0	0	
S14	3/7/2000	85	0	0	
S14	3/9/2000	198	0	0	
S14	10/28/2000	266	0	0	
S14	11/1/2000	190	0	5.24	
S14	1/8/2001	300	0	0	
S14	1/17/2001	160	0	0	
S14	1/26/2001	360	0	0	
S14	2/14/2001	220	0	0	
S14	2/20/2001	240	0	0	
S14	2/28/2001	140	0	0	
S14	3/6/2001	210	0	0	
S14	11/12/2001	180	0	0.77	
S14	11/27/2001	120	3.19	5.01	
S14	11/30/2001	200	0	0.59	

Table 1 raw data

site ID	date sampled	hardness	dissolved		Comments
			lead	total lead	
S14	12/3/2001	230	0.76	1.77	
S14	12/27/2001	172	0	0.77	
S14	1/31/2002	150	0	0	
S14	10/10/2002	270	0	1.38	DRY
S14	11/8/2002	210	0.67	56	
S14	12/16/2002	108	1.21	2.52	
S14	2/11/2003	80	1.55	2.16	
S14	3/15/2003	103	0	5.39	
S14	10/28/2003	210	0	1.04	DRY
S14	10/31/2003	260	0	3.34	
S14	12/25/2003	320	0.92	1.72	
S14	1/1/2004	305	1.46	2.14	
S14	1/13/2004	195	0	0.72	DRY
S14	10/17/2004	208	0	3.78	
S14	10/26/2004	130	0	4.42	
S14	12/5/2004	130	0	9.05	
S14	1/7/2005	124	11.4	37.5	
S14	3/17/2005	340	0	1.17	DRY
S14	6/21/2005	330	0	1.07	DRY
S14	10/17/2005	250	0	14.2	
S14	12/31/2005	112.5	0	1.01	
S14	1/14/2006	255	0	0.77	
S14	1/24/2006	250	0.71	0.94	DRY
S14	2/17/2006	220	0	1.4	
S14	4/25/2006	345	0	1.12	DRY
<b>No. Samples</b>			69		

Table 2 averaged data

Table B.2: Averaged San Gabriel River Reach 2 lead data (averaged data is shown in red font within the gray highlighted area)

site ID	date sampled	hardness	dissolved		Comments
			lead	total lead	
S14	10/14/1997	238	0	0	DRY
S14	11/10/1997	195			
S14	11/13/1997	128	0	0	
S14	11/26/1997	100	35.5	44	
S14	12/5/1997	132	18	24.6	
S14	1/4/1998	1	0	0	data point not used because of bad hardness value
S14	1/9/1998	120	20.4	27.9	
S14	1/29/1998	134	0	6.8	
S14	2/2/1998	120			
S14	2/6/1998	100	0	11.45	
S14	11/8/1998	230	0	0	
S14	12/6/1998	80	0	0	
S14	1/20/1999	276	0	0	
S14	1/25/1999	184	0	0	
S14	1/31/1999	280	0	0	
S14	2/6/1999	256	0	0	
S14	2/9/1999	286			
S14	3/15/1999	126	0	0	
S14	3/20/1999	265	0	0	
S14	3/25/1999	290	0	0	
S14	4/6/1999	178	0	0	
S14	4/8/1999	230			
S14	4/11/1999	110	0	0	
S14	1/26/2000	95	0	6.1	
S14	2/3/2000	170	0	0	
S14	2/12/2000	160			
S14	2/15/2000	128	0	0	
S14	2/17/2000	112			
S14	2/22/2000	95.2	0	0	
S14	2/25/2000	192	0	0	
S14	2/29/2000	230			
S14	3/7/2000	85	0	0	
S14	3/9/2000	198			
S14	10/28/2000	266			
S14	11/1/2000	190	0	2.62	
S14	1/8/2001	300	0	0	
S14	1/17/2001	160	0	0	
S14	1/26/2001	360	0	0	
S14	2/14/2001	220	0	0	
S14	2/20/2001	240	0	0	
S14	2/28/2001	140	0	0	
S14	3/6/2001	210	0	0	
S14	11/12/2001	180	0	0.77	

Table 2 averaged data

site ID	date sampled	hardness	dissolved		Comments
			lead	total lead	
S14	11/27/2001	120	1.595	2.8	
S14	11/30/2001	200			
S14	12/3/2001	230	0.76	1.77	
S14	12/27/2001	172	0	0.77	
S14	1/31/2002	150	0	0	
S14	10/10/2002	270	0	1.38	DRY
S14	11/8/2002	210	0.67	56	
S14	12/16/2002	108	1.21	2.52	
S14	2/11/2003	80	1.55	2.16	
S14	3/15/2003	103	0	5.39	
S14	10/28/2003	210	0	2.19	DRY
S14	10/31/2003	260			
S14	12/25/2003	320	0.92	1.72	
S14	1/1/2004	305	1.46	2.14	
S14	1/13/2004	195	0	0.72	DRY
S14	10/17/2004	208	0	3.78	
S14	10/26/2004	130	0	4.42	
S14	12/5/2004	130	0	9.05	
S14	1/7/2005	124	11.4	37.5	
S14	3/17/2005	340	0	1.17	DRY
S14	6/21/2005	330	0	1.07	DRY
S14	10/17/2005	250	0	14.2	
S14	12/31/2005	112.5	0	1.01	
S14	1/14/2006	255	0	0.77	
S14	1/24/2006	250	0.71	0.94	DRY
S14	2/17/2006	220	0	1.4	
S14	4/25/2006	345	0	1.12	DRY
<b>No. Samples</b>			58		

Table 3 averages vs CTR

Table B.3: Averaged San Gabriel River Reach 2 lead data compared to applicable CTR criteria						
date sampled	hardness	Lead acute CTR	Exceed?	Lead chronic CTR	Exceed ?	Comments
10/14/1997	238	164		6.4		DRY
11/10/1997	195	133		5.2		
11/13/1997	128	84		3.3		
11/26/1997	100	65		2.5	Yes	
12/5/1997	132	87		3.4	Yes	
4/4/1998						data point not used because of bad hardness value
4/4/1998	4	0		0.0		
1/9/1998	120	79		3.1	Yes	
1/29/1998	134	89		3.5		
2/2/1998	120	79		3.1		
2/6/1998	100	65		2.5		
11/8/1998	230	158		6.2		
12/6/1998	80	51		2.0		
1/20/1999	276	191		7.5		
1/25/1999	184	125		4.9		
1/31/1999	280	194		7.6		
2/6/1999	256	177		6.9		
2/9/1999	286	198		7.7		
3/15/1999	126	83		3.2		
3/20/1999	265	183		7.1		
3/25/1999	290	201		7.8		
4/6/1999	178	120		4.7		
4/8/1999	230	158		6.2		
4/11/1999	110	72		2.8		
1/26/2000	95	61		2.4		
2/3/2000	170	114		4.5		
2/12/2000	160	107		4.2		
2/15/2000	128	84		3.3		
2/17/2000	112	73		2.8		
2/22/2000	95.2	61		2.4		
2/25/2000	192	130		5.1		
2/29/2000	230	158		6.2		
3/7/2000	85	54		2.1		
3/9/2000	198	135		5.2		
10/28/2000	266	184		7.2		
11/1/2000	190	129		5.0		
1/8/2001	300	209		8.1		
1/17/2001	160	107		4.2		
1/26/2001	360	252		9.8		
2/14/2001	220	151		5.9		
2/20/2001	240	165		6.4		
2/28/2001	140	93		3.6		
3/6/2001	210	143		5.6		

Table 3 averages vs CTR

date sampled	hardness	Lead acute CTR	Exceed?	Lead chronic CTR	Exceed ?	Comments
11/12/2001	180	122		4.7		
11/27/2001	120	79		3.1		
11/30/2001	200	136		5.3		
12/3/2001	230	158		6.2		
12/27/2001	172	116		4.5		
1/31/2002	150	100		3.9		
10/10/2002	270	187		7.3		DRY
11/8/2002	210	143		5.6		
12/16/2002	108	70		2.7		
2/11/2003	80	51		2.0		
3/15/2003	103	67		2.6		
10/28/2003	210	143		5.6		DRY
10/31/2003	260	180		7.0		
12/25/2003	320	223		8.7		
1/1/2004	305	212		8.3		
1/13/2004	195	133		5.2		DRY
10/17/2004	208	142		5.5		
10/26/2004	130	86		3.3		
12/5/2004	130	86		3.3		
1/7/2005	124	82		3.2	Yes	
3/17/2005	340	238		9.3		DRY
6/21/2005	330	230		9.0		DRY
10/17/2005	250	172		6.7		
12/31/2005	112.5	73		2.9		
1/14/2006	255	176		6.9		
1/24/2006	250	172		6.7		DRY
2/17/2006	220	151		5.9		
4/25/2006	345	241		9.4		DRY
<b>Exceedances</b>			<b>0</b>		<b>4</b>	

Summary Table of Lead Exceedances in San Gabriel River Reach 2

Method of Assessment	number of raw data points	number of data when averaged*	exceedances of chronic standard	Impaired?
State Board wet and dry data together	69	58	4	No
Regional Board wet data only	61	54	4	No

\* Per the State Listing Policy, the data should be averaged over the period of time relative to the standard. Since the chronic CTR standard is based on a four-day period, data falling within a single 4-day period was Averaged.