



CITY OF SIGNAL HILL

2175 Cherry Avenue ♦ Signal Hill, CA 90755-3799

April 29, 2013

Via email: commentletters@waterboards.ca.gov

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Comment Letter – Los Angeles River Nitrogen Compounds and Related Effects TMDL

The City of Signal Hill thanks the State Water Resources Control Board (SWRCB) for the opportunity to comment on the proposed amendment to the Los Angeles Regional Water Quality Control Plan (Basin Plan) to revise the Los Angeles River Nitrogen Compounds and Related Effects TMDL. This amendment would incorporate site-specific ammonia objectives.

The City is concerned that the TMDL appears to require minor point sources¹, such as the City, to comply with one-hour average waste load allocations (WLAs) for ammonia.² The City believes that one-hour average requirements are appropriate for significant point sources, such as Publicly Owned Treatment Works (POTW) discharges, but not for lower-volume discharges with far lower nitrogen loads. As stated in the TMDL, “the major POTWs contribute 84.1% of the total dry weather nitrogen load”³ and the hourly average for ammonia was designed to control loads from these POTW sources. It would be infeasible and extremely costly for parties other than POTWs to conduct hourly monitoring in order to comply with the hourly average WLA.

The City understands from previous conversations with Los Angeles Regional Board staff that hourly WLAs would be applied only to POTWs and that the City would not be required to conduct hourly monitoring for ammonia. The City respectfully requests that the State Water Board resolution approving the Basin Plan Amendment clearly state that hourly monitoring for ammonia will not be required for MS4 dischargers in monitoring plans, including Integrated Monitoring Plans (IMPs) and Coordinated

¹ “Waste loads are allocated to minor point sources enrolled under NPDES or WDR permits including but not limited to Tapia WRP, Whittier Narrows WRP, Los Angeles Zoo WRP, industrial and construction stormwater, and municipal storm water and urban runoff from municipal separate storm sewer systems (MS4s)” (p. 5 in Attachment A to Resolution No. R12-010 Los Angeles River Nitrogen Compounds and Related Effects TMDL)

² Ibid, pp. 5-6

³ Ibid, p. 3

Integrated Monitoring Plans (CIMPs) developed pursuant to Regional Water Board Order No. R4-2012-0175.

The City, again, appreciates the opportunity to comment on the TMDL. Please contact us if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ken Farfsing', with a large, sweeping flourish extending to the right.

Kenneth C. Farfsing
City Manager

cc: City Council
Steve Myrter
John Hunter
Richard Watson