
Los Angeles Regional Water Quality Control Board

September 18, 2017

Robert Kress
Senior Vice President
Lubricating Specialties Company
8015 Paramount Boulevard
Pico Rivera, CA 90660

Dear Mr. Kress:

LOCATION CHANGE FOR BOARD MEETING AND TRANSMITTAL OF THE REVISED TENTATIVE WASTE DISCHARGE REQUIREMENTS (WDRS) AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR LUBRICATING SPECIALTIES COMPANY, PICO RIVERA FACILITY, PICO RIVERA, CALIFORNIA (NPDES NO. CA0059013, CI NO. 6521)

On August 14, 2017, we transmitted the tentative Waste Discharge Requirements (WDRs), National Pollutant Discharge Elimination System (NPDES) permit, and tentative time schedule order (TSO) for the Lubricating Specialties Company, Pico Rivera Facility. No comments were received by the Regional Water Board before the comment period deadline on September 14, 2017. Based on internal review, staff have subsequently made minor changes on Pages F-18, F-19, and F-44 of the Fact Sheet (enclosed) of the tentative WDRs and NPDES permit. Changes in the revised tentative WDRs and NPDES permit appear in the ~~strikeout~~/underline format. No changes were made to the tentative TSO.

In the August 14, 2017, letter, we informed you that the October Board hearing would be held at the Metropolitan Water District of Southern California, 700 North Alameda Street, Los Angeles, California, at 9:00 a.m. on October 5, 2017. However, the location of the public hearing at which your item will be heard has been changed to **the Ronald Reagan Building (Auditorium), 300 South Spring Street, Los Angeles, California, at 9:00 a.m. on October 5, 2017.**

In accordance with administrative procedure, the Regional Water Board at a public hearing to be held on **October 5, 2017**, at 9:00 a.m., at the Ronald Reagan Building (Auditorium), 300 South Spring Street, Los Angeles, will consider the revised tentative WDRs and NPDES Permit (revised pages enclosed) and the tentative TSO. It is expected that the Board will take action at the hearing; however, as testimony indicates, the Board, at its discretion, may order further investigation. Since we did not receive comments and the proposed changes are minor, this item may be considered with the uncontested items.

If you have any questions, please contact Ching To at Ching-Yin.To@waterboards.ca.gov or at (213)576-6696.

Sincerely,



Cassandra D. Owens, Chief
Industrial Permitting Unit (NPDES)

Enclosures

MAILING LIST

Mr. David Smith, Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Ms. Robyn Stuber, Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Ms. Becky Mitschele, Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
Mr. Kenneth Wong, U.S. Army Corps of Engineers
Mr. Bryant Chesney, NOAA, National Marine Fisheries Service
Mr. Jeff Phillips, Department of Interior, U.S. Fish and Wildlife Service
Mr. Kurt Souza, State Water Resources Control Board, Drinking Water Division
Mr. William Paznokas, California Department of Fish and Wildlife, Region 5
Ms. Teresa Henry, California Coastal Commission, South Coast Region
Mr. Tim Smith, Los Angeles County, Department of Public Works
Mr. Angelo Bellomo, Los Angeles County, Department of Public Health
Mr. James Enriquez, City of Pico Rivera, Department of Public Works
Mr. David Snyder, Los Angeles County Sanitation Districts
Mr. Theodore Johnson, Water Replenishment Districts of Southern California
Ms. Sarah Sikich, Heal the Bay
Mr. Steven Johnson, Heal the Bay
Ms. Bruce Reznik, Los Angeles Waterkeeper
Ms. Laura West, Natural Resources Defense Council
Ms. Becky Hayat, Natural Resources Defense Council
Mr. Jason Weiner, Ventura Coastkeeper
Mr. Daniel Cooper, Lawyers for Clean Water
Mr. James Ashby, PG Environmental
Ms. Sarah Torres, PG Environmental
Mr. Carlos Pena, Lubricating Specialties Company
Mr. Ingo Giani, Lubricating Specialties Company
Mr. Jim Wade, Lubricating Specialties Company
Mr. Mark Negast, Lubricating Specialties Company
Ms. Diana Herrick, Lubricating Specialties Company
Mr. Weyman Kam, CET Engineering, Inc.

Act (16 U.S.C.A. §§ 1531 to 1544). This Order requires compliance with effluent limits, receiving water limits, and other requirements to protect the beneficial uses of waters of the state, including protecting rare, threatened, or endangered species. The Discharger is responsible for meeting all requirements of the applicable Endangered Species Act.

10. **Trash Provisions.** The State Water Board adopted the “*Amendment to the Ocean Plan and Part I Trash Provisions of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California*” (Trash Amendments) through Resolution 2015-0019, which was approved by OAL on December 2, 2015 and became effective upon U.S. EPA approval on January 12, 2016. The Trash Amendments established a narrative water quality objective for trash and a prohibition on the discharge of trash, implemented through permits issued pursuant to CWA section 402(p), waste discharge requirements, or waivers of waste discharge requirements.

The Trash Amendments apply to all surface waters of the State, with the exception of those waters within the jurisdiction of the Los Angeles Regional Water Board where trash or debris TMDLs are in effect prior to the effective date of the Trash Amendments. The Los Angeles River Trash TMDL was effective prior to the effective date of the Trash Amendments. However, the Los Angeles River Trash TMDL did not include any waste load allocations for minor NPDES permittees. As such, this Order implements the requirements of the Trash Provisions through the prohibition of trash discharges to the NPDES discharge point. This Order also requires the Discharger to develop and implement a Storm Water Pollution Prevention Plan (SWPPP), which shall include specific BMPs used as storm water control measures that the Discharger will undertake to prevent the discharge of trash from the Facility to the Rio Hondo. The Discharger is required to detail and submit to the Regional Water Board annually (through their annual SWPPP submittal) specific BMPs (storm water control measures) employed to control and prohibit the discharge of trash and other pollutants from the Facility through the NPDES discharge points, consistent with the monitoring and reporting requirement of the Trash Provisions.

11. **Mercury Provisions.** The State Water Board adopted “*Part 2 of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California- Tribal and Subsistence Fishing Beneficial Uses and Mercury Provisions*” (Mercury Provisions) through Resolution 2017-0027, which was approved by OAL on June 28, 2017 and became effective upon U.S. EPA approval on July 14, 2017. The Mercury Provisions established one narrative and four numeric water quality objectives for mercury and three new beneficial use definitions, implemented through NPDES permits issued pursuant to CWA section 402, waste discharge requirements, or waivers of waste discharge requirements. ~~The Mercury Provisions are applicable to this Facility as the Rio Hondo Reach 2 has beneficial uses of Warm and Wild, and there is currently no TMDL or site specific objectives for mercury in Rio Hondo Reach 2.~~ The Provisions included implementation provisions for individual non-storm water NPDES permits for municipal and industrial dischargers; storm water discharges including the MS4 and the Industrial General Permit (NPDES No. CAS000001); mine site remediation; nonpoint source discharges; dredging activities; and wetland projects.

The Provisions did not prescribe specific implementation provisions for individual industrial permittees that discharge storm water only. However, requirements for mercury included in this Order ~~are~~ at least as stringent as and ~~are~~ consistent with the requirements included in the Provisions for industrial storm water dischargers regulated under the Industrial General Permit. The type of discharges regulated under the Industrial General Permit is similar to the Facility’s discharge as the Facility also discharges storm water only from an industrial site. The Provisions for industrial storm water permittees regulated under the Industrial General Permit includes a revision to the mercury numeric action level (NAL)

R
E
V
I
S
E
D
T
E
N
T
A
T
I
V
E

to 0.3 µg/L (300 ng/L) or lower. This Order establishes a water-quality based effluent limitation (WQBELs) for mercury expressed as a maximum daily effluent limitation of 0.1 µg/L (100ng/L) for the protection of the human health criterion in the CTR, based on the presence of reasonable potential for mercury with consideration of effluent monitoring data submitted by the Discharger during the term of Order No. R4-2011-0176 (See section IV.C.3 of this Fact Sheet). Therefore, in achieving compliance with the mercury effluent limitation prescribed in this Order, the Discharger will be held to a treatment level that is at least as stringent as and comparable to that required of other industrial storm water dischargers in the Region. ~~Compliance with the permit limitation will protect the mercury objectives set forth in the Provisions, and thus satisfy the requirement of the Mercury Provisions for industrial storm water discharges.~~

D. Impaired Water Bodies on the CWA section 303(d) List

Section 303(d) of the CWA requires states to identify specific water bodies where water quality standards are not expected to be met after implementation of technology-based effluent limitations on point sources. For all CWA section 303(d)-listed water bodies and pollutants, the Regional Water Board plans to develop and adopt total maximum daily loads (TMDLs) that will specify waste load allocations (WLAs) for point sources and load allocations (LAs) for non-point sources, as appropriate.

U.S. EPA approved the State's 2012 303(d) list of impaired water bodies on June 26, 2015. Certain receiving waters in the Los Angeles and Ventura County watersheds do not fully support beneficial uses and therefore have been classified as impaired on the 303(d) List of Water Quality Limited Segments (hereinafter 303(d) list) and have been scheduled for TMDL development. The Facility's discharge flows into Rio Hondo Reach 2, at a location that is less than 0.2 miles upstream of Rio Hondo Reach 1. Therefore, the impact from the Facility's discharge is expected to be present at Rio Hondo Reach 2 as well as at Rio Hondo Reach 1. As such, impairments for both Rio Hondo Reach 1 and Reach 2 are considered in this Order, and the more stringent requirements for these Reaches based on applicable TMDLs as listed below are implemented in this Order.

The 2012 State Water Board California 303(d) list includes the classification of the Rio Hondo Reach 1 and Reach 2 and identifies their pollutants/stressors of concern. Rio Hondo Reach 1 is identified as impaired for: coliform bacteria, copper, lead, toxicity, trash, zinc, and pH. Rio Hondo Reach 2 is identified as impaired for: ammonia, coliform bacteria, and cyanide. Coliform bacteria, nutrients (including ammonia, nitrite as nitrogen, nitrate as nitrogen, and total nitrite plus nitrate), copper, lead, zinc, and trash are addressed through TMDLs as detailed below; the impairment for pH is addressed through the Los Angeles River Nutrients TMDL. TMDLs to address cyanide and toxicity are scheduled for completion by 2021.

- 1. Los Angeles River Bacteria TMDL.** The Regional Water Board adopted the *Amendment to the Water Quality Control Plan - Los Angeles Region to Incorporate the Los Angeles River Watershed Bacteria TMDL* through Resolution No. R10-007, which was approved by the State Water Board on November 1, 2011; by the Office of Administrative Law (OAL) on March 21, 2012; and by the U.S. EPA on March 23, 2012. It became effective on March 23, 2012. The Los Angeles River Bacteria TMDL contains WLAs of single sample and geometric mean numeric targets for E.coli during both dry and wet weather events for general and individual NPDES permits. This Order includes effluent limitations based on the Los Angeles River Bacteria TMDL.
- 2. Los Angeles River Nutrients TMDL.** The Regional Water Board adopted Resolution No. 03-009 on July 10, 2003, that amended the Basin Plan to incorporate the Los Angeles River Nitrogen Compounds and Related Effects, which was approved by the State Water Board and OAL on November 19, 2003, and February 27, 2004, respectively. The Los

R
E
V
I
S
E
D
T
E
N
T
A
T
I
V
E

Parameter	Units	Effluent Limitations				Basis ¹
		Average Monthly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum	
Nitrate Nitrogen, Total (as N) ³	mg/L	8.0	--	--	--	E, TMDL
	lbs/day ²	17	--	--	--	
Nitrite Nitrogen, Total (as N) ³	mg/L	1.0	--	--	--	E, TMDL
	lbs/day ²	2.2	--	--	--	
Nitrite Plus Nitrate, Total (as N) ³	mg/L	8.0	--	--	--	E, TMDL
	lbs/day ²	17	--	--	--	
Settleable Solids	ml/L	--	0.3	--	--	E, BPJ
Temperature	°F	--	--	--	86	E, BP, WP, TP
Turbidity	NTU	--	75	--	--	E, BPJ
Total Petroleum Hydrocarbons (TPH) ⁶	µg/L	--	100	--	--	E, BPJ
	lbs/day ²	--	0.22	--	--	
Priority Pollutants						
Arsenic, Total Recoverable	µg/L	--	10	--	--	BP, MCL, SIP
	lbs/day ²	--	0.022	--	--	
Cadmium, Total Recoverable (Dry Weather) ⁷	µg/L	--	4.2	--	--	E, CTR, SIP
	lbs/day ²	--	0.0090	--	--	
Cadmium, Total Recoverable (Wet Weather) ^{8,9}	µg/L	--	3.1	--	--	E, TMDL
	lbs/day ²	--	0.0067	--	--	
Copper, Total Recoverable (Dry Weather) ^{7,8,10}	µg/L	--	100	--	--	E, TMDL
	lbs/day ²	--	0.22	--	--	
Copper, Total Recoverable (Wet Weather) ^{8,9}	µg/L	--	67	--	--	E, TMDL
	lbs/day ²	--	0.14	--	--	
Lead, Total Recoverable, Dry Weather ^{7,8,11}	µg/L	--	9.0	--	--	E, TMDL
	lbs/day ²	--	0.019	--	--	
Lead, Total Recoverable, Wet Weather ^{8,9,11}	µg/L	--	62	--	--	E, TMDL
	lbs/day ²	--	0.13	--	--	
Mercury, Total Recoverable	µg/L	--	0.10	--	--	CTR, SIP
	lbs/day ²	--	0.00022	--	--	
Selenium, Total Recoverable	µg/L	--	8.2	--	--	E, CTR, SIP
	lbs/day ²	--	0.018	--	--	
Zinc, Total Recoverable, Dry Weather ^{7,8}	µg/L	--	131	--	--	E, TMDL
	lbs/day ²	--	0.28	--	--	
Zinc, Total Recoverable, Wet Weather ^{8,9}	µg/L	--	159	--	--	E, TMDL
	lbs/day ²	--	0.34	--	--	
Cyanide, Total (as CN)	µg/L	--	8.5	--	--	E, CTR, SIP
	lbs/day ²	--	0.018	--	--	

REVISITED TENTATIVE