City of
IRWINDALE

February 26, 2015

Mr. Sam Unger
Executive Officer
LARWQCB
320 W. 4th St., Suite 200
Los Angeles, CA 90013

Subject: Los Angeles County MS4 Permit – Revised City of Irwindale Integrated Monitoring Program

Dear Mr. Unger:

The **City of Irwindale** (City) is in receipt of the Regional Board's Integrated Monitoring Program (IMP) review letter dated January 26, 2015. Based on the review letter, we are pleased to submit for your review and approval our revised IMP that contains the specified corrections. The City shall incorporate these revisions into our final IMP once Regional Board staff has reviewed and approved these amendments.

The IMP review letter specifies two substantive elements missing in the City's monitoring program submittal: (1) receiving water monitoring; and (2) non-stormwater outfall based monitoring. These and other requests for IMP changes and corrections are contained in *Enclosure 1 - Summary of Comments and Required Revisions* and are highlighted in red type in *Enclosure 2 - City of Irwindale's Integrated Monitoring Program, Revised Draft*.

I. Receiving Water Monitoring

The City is located in two sub-watersheds: (1) Reach 3 of the San Gabriel River; (2) and Reach 2 of the Rio Hondo. The City cannot access the San Gabriel River during storm events because it is flood control channel operated by the County of Los Angeles, which prohibits trespassing. Therefore, the City will rely on wet weather monitoring data generated from the County's mass emission station (S14), located in Reach 2 of the San Gabriel River. For Reach 2 of the Rio Hondo, monitoring will be performed at the Sawpit Wash and East Live Oak Avenue overpass using a long pole to a grab sample.

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II. Non-stormwater Outfall Monitoring

The City will conduct non-stormwater discharge outfall monitoring for TMDL constituents relative to Reach 2 of the Rio Hondo, and Reach 3 of the San Gabriel River. The ostensible purpose of non-stormwater outfall monitoring is to determine compliance with TMDLs. As such, the City will also rely on its illicit connection and discharge detection and elimination program to address impermissible non-stormwater discharges to the MS4. The purpose of the program is to detect illicit discharges and connections by: (1) prohibiting such discharges; and (2) if prohibition is not feasible, to require the discharger to obtain a discharge permit. By eliminating the discharge, the mechanism for transporting TMDLs and other pollutants collected in the MS4 are prevented from entering the receiving water.

III. Necessary Revisions

Please find enclosed a Summary of Comments and Necessary Revisions and the City's Revised Draft IMP for your use.

In closing, should you have any questions, please feel free to contact Elizabeth Rodriguez, Public Works Analyst, at (626) 430-2211 or myself at (626) 430-2212.

Sincerely,

William K. Tam, P.E.
Public Works Director

cc: John Davidson, City Manager
Ivar Ridgeway, Chief of the Storm Water Permitting Unit, LARWQCB
Erum Razzak, Storm Water Permitting Unit, LARWQCB

Enclosures: Enclosure 1 – Summary of Comments and Necessary Revisions
Enclosure 2 – City of Irwindale's Integrated Monitoring Program, Revised Draft

Section One Monitoring and Reporting Program (MRP)

1.0 Summary

The Los Angeles County MS4 permit (Order R4-2012-0175) includes compliance with a Monitoring and Report Program (No. CI-6948), (MRP). The MRP addresses several types of monitoring required by the permit, including: (1) TMDL monitoring at the outfall and receiving water; (2) municipal action levels (MALs) monitoring at the outfall; (3) monitoring action levels (non-stormwater) at the outfall; (4) new development/re-development effectiveness tracking (limited to observations); (4) compliance with municipal action level (MAL) parameters; (5) regional studies; and (6) toxicity testing. The City intends to meets these requirements through its **Integrated Monitoring Program** (IMP) submittal.

In addition to the above monitoring requirements, the WMP section of the permit the permit also appears to require additional monitoring not referenced in the MRP (VI.C.2.a.i and ii). Essentially, these provisions require monitoring of stormwater discharges against water quality standards that are not TMDLs either contained in the basin plan or based on federal regulations. The purpose of the monitoring is to facilitate an evaluation of the adequacy of control measures in meeting the specified limitations. The problem, however, is that permit under the WMP section does not specify which pollutants and water quality standards must be monitored for or to be met. Discussions with Regional Board staff revealed that the water quality standards are mandated by federal regulations. They can be taken from the previous permit under the previous MS4 permit's MRP under Attachment U, which is referenced herein.

Pollutants subject to monitoring will be loaded into the RAA/Water Quality Model to evaluate to what extent the City is persistently exceeding

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TMDLs and other water quality standards and identify BMPs that are necessary to preventing such exceedances.

1.1 Integrated Monitoring Program

The City has opted for an **Integrated Monitoring Program** (IMP) to comply with monitoring and SWMP/WMP requirements under the MS4 permit. In accordance with the MRP, the IMP includes the following elements: (1) receiving water monitoring; (2) storm water outfall based monitoring; (3) non-storm water outfall based monitoring; and new development/re-development effectiveness tracking; (4) compliance with municipal action level (MAL) parameters; (5) regional studies; and (6) toxicity testing.

1.2 IMP Requirements

Through the Integrated Monitoring Program (IMP), the City proposes to consolidate applicable monitoring program requirements as specified in attachment E of the MS4, which *provides flexibility to allow Permittees to coordinate monitoring efforts on a watershed or sub-watershed basis to leverage monitoring resources in an effort to increase cost-efficiency and effectiveness and to closely* align monitoring with TMDL monitoring requirements *and Watershed Management Programs*. To that end, the City intends to share costs with the cities of South El Monte and West Covina. With South El Monte, the City will share the costs of conducting ambient monitoring with Reach 2 of the Rio Hondo. Irwindale, South El Monte, and West Covina will share the costs of ambient monitoring for Reach 3 of the San Gabriel River. The cities participation in ambient monitoring is voluntary. Though the SWAMP should be responsible for performing ambient monitoring, it is not known when, if ever, it intends to

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conduct ambient monitoring in these reaches. In the meantime, the City recognizes that the ambient monitoring approach will yield accurate data needed to evaluate the beneficial uses and facilitate compliance with ambient TMDL WLAs and other water quality standards.

The City does not plan to use a collaborative approach pay for monitoring in the receiving water to determine compliance with wet weather TMDLs because TMDLs are ambient not wet weather standards as explained below.

GIS maps have been developed to depict the geographic boundaries of the monitoring plan, including the receiving waters, the MS4 catchment drainages and outfalls, sub-watershed boundaries, land use, and proposed receiving water monitoring stations. Outfall monitoring points are shown on the maps along with the HUC-12 sub watershed boundaries. The maps are contained in **Appendix A**.

The City of Irwindale drains into Los Angeles River Watershed System via Reach 2 of the Rio Hondo and the San Gabriel River Watershed at Reach 3. The Table below summarizes the land use breakdown:

Table I – Land use breakdown

Land Use	Rio Hondo Channel		San Gabriel River		Total	
	Acres	Percentage	Acres	Percentage	Acres	Percentage
Residential	6.16	0.1%	53.51	0.88%	59.67	0.98%
Commercial	1.20	0.02%	124.87	2.05%	126.07	2.07%
Industrial	400.02	6.6%	2255	37.08%	2655.02	43.7%
Public	321.06	5.3 %	2052.57	33.7%	2373.7	39%
Vacant	32.81	0.5 %	294.44	5%	327.25	5.4%
Transportation	54.88	0.9%	538.33	8.9%	593.21	9.8%
Total	**816.13**	**13.4%**	**5263.9**	**86.6%**	**6080**	**100%**

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Table II – Land Use Breakdown regarding HUC -12 Sub Watersheds

Land Use	Santa Anita Wash-Rio Hondo		Big Dalton Wash		Santa Fe Flood Control Basin - SGR	
	Acres	Percentage	Acres	Percentage	Acres	Percentage
Residential	6.16	0.1%	50.81	0.8%	2.7	0.04%
Commercial	1.20	0.02%	10.51	0.2%	114.36	1.9%
Industrial	400.02	6.6%	380.13	6.3%	1874.9	30.8%
Public	321.06	5.3 %	91.27	1.5%	1951.36	32.09%
Vacant	32.81	0.5 %	143.40	2.4%	151.04	2.5%
Transportation	54.88	0.9%	173.26	2.8%	310.19	5.1%
Total	**816.13**	**13.4%**	**849.38**	**13.9%**	**4414.5**	**72.6%**

1. 3 Receiving Water Monitoring

The MS4 permit requires receiving water monitoring to be performed at in-stream mass emissions stations; additional receiving water compliance points approved by the Regional Board's Executive Officer; and additional locations that are representative of impacts from MS4 discharges. The objectives of receiving water monitoring are: (1) determine if receiving water limitations are being achieved; (2) assess trends in pollutant concentrations over time, or during specified; and (3) determine whether the designated beneficial uses are fully supported based on water chemistry, as aquatic toxicity and bio-assessment monitoring.

The City's receiving water monitoring plan shall be limited to utilizing existing ambient water quality data developed by the Regional Board's Surface Water Ambient Program (SWAMP) and data generated by other agencies including, but not limited to, the Council

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for Watershed Health (CWH) and the Sanitation Districts of Los Angeles County (SDLAC).

There City sees no benefit in performing receiving water monitoring to determine compliance with wet weather TMDL WLAs or to assess the health of the receiving water. Pollutants during a storm event emanate from a variety sources including, but not limited to: permitted facilities such as industrial and construction sites; various municipal point sources; non-municipal point sources (e.g., sewage treatment plans) and non-point sources including atmospheric deposition. It would be impossible to determine which of these dischargers was responsible for exceeding a wet weather WLA. It should be clear that monitoring during a significant storm event would be of no value in assessing the health of the receiving water. In fact, it is the worse time to monitor. The City will, nevertheless, rely on in-stream ambient monitoring to assess the impact of the SWMP/WMP on the beneficial uses of the receiving waters into which it discharges in accordance with the schedule referenced below in Section 1.10.

The City of Irwindale is located in the Los Angeles River Watershed Management Area and San Gabriel River Watershed Management Area. The City drains into Sawpit Wash via the Buena Vista Channel and goes into Rio Hondo Reach 2, which is tributary to the Los Angeles River System.

Permittees have been directed to utilize mass emission stations for receiving water sampling. Los Angeles County mass emission station S14 is located below the San Gabriel River Parkway in Pico Rivera, and is the closest mass emission station to the City of Irwindale. S14 station is located in Reach 2 of the San Gabriel River, 10 miles south-west of City. The City will use this location for receiving water monitoring.

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For Reach 2 of the Rio Hondo, the nearest mass emissions station is S10, which is located in the Los Angeles River estuary. The City will not use this mass emission station because it would provide no benefit. The distance between the City's last point of discharge to Reach 2 of the Rio Hondo and the estuary is so great that any flow from it would reveal nothing in terms of its contribution to receiving water limitation exceedances. Instead, the City proposes TMDL receiving water monitoring locations located in the Sawpit Wash and East Live Oak Avenue. The City will use the grab sampling method for receiving water sampling at the channel overpass because it cannot access Los Angeles County's jurisdictionally permitted area.

The City will also include receiving water monitoring above the Los Angeles River Estuary as required by the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL. In this instance, the City will use the S10 mass emission station for receiving water monitoring.

The table below summarizes the location of Receiving Water Monitoring:

Table III – Receiving Water Monitoring Location

Water Body	Waterbody Location	Drainage Area	Coordinates	
			Latitude	Longitude
San Gabriel River	S14 Mass Emission Station	450 Square Miles	33.847301	-118.2096
Rio Hondo Channel	Sawpit Wash & E. Live Oak Ave.	25 Square miles	34.1135895	-117.9985658
DC and LA & LB Harbor	LAR Estuary	850 Square Miles	33.772925	-118.2034833
DC and LA & LB Harbor	Mouth of SGR (2nd street &SGR)	640 Square Miles	33.791567	-118.230747

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1.4 Storm Water Outfall-Based Monitoring

The City is committed to stormwater monitoring at the outfall in accordance with federal stormwater regulations. Outfall monitoring will be limited to: (1) aiding in determining compliance with WQBELs (TMDL WLAs and other water quality standards measured against ambient standards); and (2) evaluating stormwater discharges against Municipal Action Levels (MALs). Outfall monitoring, however, cannot determine compliance with wet weather TMDL WLAs in the receiving water. Once again, there is no support for the legitimate existence of a wet weather TMDL or any water quality standard. Further, the purpose of the MALs is unclear and appears to be superfluous. However, the City would be willing to comply with MAL monitoring if offered as alternative to conventional monitoring for compliance purposes.

The City has identified three (3) outfalls from which discharges are released to receiving waters. One drains to Reach 2 Rio Hondo and two drain to Reach 3 of the San Gabriel River. See **Appendix A-1** for outfall and sampling locations. The City intends to monitor each of the outfalls in rotation over the term of the permit. No outfall prioritization is necessary.

It should be noted that the outfalls are not actual monitoring locations from which samples can be taken because they are located within LACFCD property which is not accessible to the City (see picture below). Instead, the City has identified the storm drain manhole points nearest to the outfall(s).

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These are referred to in federal stormwater regulations as "field screening" points. Their locations indicate a mix of industrial, commercial, and residential uses and, therefore, are representative. Stormwater discharges from the outfall sampling points will be measured against ambient TMDL standards. The ambient standard is one that is required toassure that beneficial uses of receiving waters are protected against impairment. Sampling results will be reported to the Regional Board annually. If persistent exceedances of the ambient standards are detected, the iterative process will be triggered.

The City plans to conduct stormwater outfall monitoring three times a year, during the wet season (October 1 through May 15), with at least one month in between in accordance with 40 CFR §122.21(g)(7). Each of the three outfalls is representative to the extent it includes drainage areas from a mix of land uses. One outfall from each reach will be sampled (one for Reach 2 of the Rio Hondo and one for Reach 3 of the San Gabriel River) each year over the term of the permit in an alternating manner. At the end of the 5 year term of the permit the City will be able to evaluate persistent exceedances of TMDLs and other water quality standards and propose adjustments to BMPs and other actions in the Report of Waste Discharge (ROWD), the MS4 permit reapplication that is due to the Regional Board 180 days prior to the expiration of the

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current permit (May of 2017).

The City will use the data to determine compliance with WQBELs, expressed as ambient TMDL WLAs, and to measure stormwater discharges against municipal action levels (MALs).

Table IV – Land Use Breakdown – Monitoring Locations

Land Use Type	Drainage Area (Acres & Percentage)				
	M1	M2	M3	M4	M5
Residential	6.16	2.70	-	38.1	12.7
Commercial	1.20	114.4	11.01	7	3.5
Industrial	400.02	874.9	108.6	253.42	126.71
Public	321.06	951.4	44.02	60.8	30.4
Vacant	32.81	151.04	95.4	95.6	47.8
Transportation	54.88	310.19	140.5	115.5	57.7
Total	**816.13 (13.4%)**	**2404.6 (39.5%)**	**399.5 (6.6%)**	**570.4 (9.4%)**	**278.8 (4.9%)**

Table V – Outfall and Field Screening Points Location

ID No.	Outfall Coordinates	Outfall Location	Ownership	Size (in)	Outfall material	Picture
BUENV C 016	34.117730; -117.9921806	Mountain Ave.	LACFCD	54	Reinforced Concrete Box (RCB)	
SGR 074A	34.09931667; -117.9835083	Olive St.	LACFCD	87	Reinforced Concrete Box (RCB)	
BDW 023	34.0935111; -117.9430611	Azusa Canyon Rd.	LACFCD	60	Reinforced Concrete Box (RCB)	
BDW 028	34.097125; -117.9340472	Irwindale Ave.	LACFCD	72	Reinforced Cement Concrete (RCC)	

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BDW 029	34.098375; -117.9299306	Olive St. & Big Dalton Wash	LACFCD	54	Reinforced Concrete Box (RCB)	
ID No.	**Field Screening Coordinates**	**Field Screening Location**	**Ownership**	**Size (in)**	**Field Screening material**	**Picture**
1	34.09975833; -117.93325	Irwindale Ave.	LACFCD	36	Manhole Pipe to Pipe Main Line	
2	34.10209444; -117.9314556	Olive St. & Irwindale Ave.	LACFCD	36	Junction Structure-Pipe to RCB	
3	34.09777778; -117.9406139	Azusa Canyon Rd.	LACFCD	36	Manhole Pipe to Pipe Main Line	
4	34.115103; -117.999837	Mountain Ave.	LACFCD	36	Manhole Concrete Box Storm Drain	
5	34.107486; -117.974075	River grade Rd.	LACFCD	36	Manhole Pipe to Pipe Main Line	

1.5 Non-Storm Water Outfall-Based Monitoring

As per the Los Angeles County MS4 Permit, non-stormwater outfall based monitoring must be included in the IMP as outlined in Part IX of Attachment E. The City's non-stormwater outfall based screening and monitoring process are outlined below:

- **Field Screening**: Outfalls greater than or equal to 36 inches in diameter will be located and mapped using GIS. Outfalls will be monitored two additional times, after a 72 hour rain event. Observations will be conducted during working hours. During observations, staff will complete an **Outfall Screening Form** containing information such asdate, time, weather, flow amount,

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visual turbidity, trash, and odor. Photographs will also be taken during inspections.

- **Inventory of Screening Points**: An inventory will be developed for major MS4 outfalls with known significant non-stormwater discharges and those requiring no further assessment.
- **No further Assessment**: No further Assessment will be reported in the inventory database if no flow is observed on at least 4 out of 5 visits.
- **Prioritization Criteria & Source Investigation**: Based on data collected during the screening process, the City will identify screening points with significant non-stormwater discharges and those requiring no further action. The data collected as part of the outfall screening process will be used to prioritize outfalls for source investigation. The City will complete 25% of source identification inventory by December 28, 2015 and 100% by December 28, 2017.
- **Implement Source Identification**: If necessary, the City will implement source identification in prioritized order, consistent with the City's IC/ID Program. The City's contribution will be quantified if the discharge is comprised of multiple sources. Upstream jurisdictions and the Regional Board will be notified if the source originates outside the City's jurisdiction.
- **Monitoring Non-storm Water Discharge Exceedance Criteria**: The City will monitor outfall screening points conveying significant discharges comprised of unknown or conditionally exempt non-stormwater discharges, or continuing illicit discharges. In addition, an outfall subject to an approved dry weather TMDL will be monitored per the TMDL monitoring plan. Monitoring frequency will be reduced to twice per year beginning the second year of monitoring provided that

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pollutant concentrations during the first year do not exceed WQBELs or water quality standards on the 303(d) list for the receiving water. Outfall(s) will be monitored for flow and constituents identified in Attachment N of MS4 permit, and other pollutants identified on the 303(d) list. Pollutants identified in a TIE conducted in response to observed aquatic toxicity during dry weather at the nearest downstream receiving water monitoring station. If the discharge exhibits acute toxicity, then a TIE shall be conducted. The following parameters shall be monitored:

- Flow
- Pollutants assigned a WQBEL or RWL to implement TMDL Provisions applicable to the receiving waterbody
- Other Pollutants identified on the CWA 303(d) list for receiving water
- Pollutants identified in a TIE conducted in response to observed aquatic toxicity during dry weather at the nearest downstream receiving water monitoring station during the last sample event or, where the TIE conducted on the receiving water sample was inconclusive. If the discharge exhibits aquatic toxicity, then a TIE shall be conducted.
- Other parameters in Table E - 2 identified as exceeding the lowest applicable water quality objective in the nearest downstream receiving water monitoring station per Part VI.D.1.d. of the MS4 Permit.

However, the City will perform outfall visual and sampling monitoring in connection with illicit connection and discharge elimination requirements in keeping with federal stormwater regulations and USEPA guidance. Non-stormwater discharge monitoring will conform to 122.26(d)(1)(D) for the purpose of screening for illicit connections and dumping, which specifies

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visual monitoring at outfalls for dry weather (non-stormwater discharges). Visual monitoring shall be performed twice a year during dry periods. If flow is observed samples for the outfall (or field screening points):

> *...samples shall be collected during a 24 hour period with a minimum period of four hours between samples. For all such samples, a narrative description of the color, odor, turbidity, the presence of an oil sheen or surface scum as well as any other relevant observations regarding the potential presence of non-storm water discharges or illegal dumping shall be provided.*

In addition, regulations require a narrative description of the results from sampling for fecal coliform, fecal streptococcus, surfactants (MBAS), residual chlorine, fluorides and potassium; pH, total chlorine, total copper, total phenol, and detergents (or surfactants) shall be provided along with a description of the flow rate. These analytes will be used as potential indicators of illicit discharges, which would trigger an up-stream investigation to identify the source of the suspected illicit discharge or connection. If the source of the illicit discharge/connection and discharger is identified, the City shall notify the discharger that it will need to halt the discharge and, if not feasible, will require the discharger to obtain a discharge permit.

Conducting visual monitoring of field screening points for non-stormwater discharges will be difficult for Reach 2 of the Rio Hondo. Outfalls in this flood control channel, as shown below, are equipped with iron flap gates that open to allow stormwater to be discharged to the floor of the channel.

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The flap gate opens to a degree that is determined by the amount of stormwater flow expressed as cubic feet per second (cfs). It estimated that the amount of flow that is needed to open the gate is at least 10 cfs from a one inch storm. During dry periods, non-stormwater cannot leave the storm drain connected to the flap-gated outfall. In other words, there will be no non-stormwater discharge releases to the channel and, therefore, monitoring for any purpose will not be possible or even necessary. Nevertheless, the City will monitor Reach 2 Rio Hondo outfalls at upstream manhole sampling points to verify that there is no discharge from these outfalls.

1.6 Municipal Action Levels

The purpose of municipal action levels (MALs) is not clear and appears to superfluous given the permit's other monitoring requirements. All of the MAL constituents are already addressed by TMDLs and federally mandated monitoring for certain constituents[1]. The MS4 permit's fact

[1]Total nitrogen, total phosphorous, Ammonia N, TKN, Total PCBs, Chlordane, Dieldrin, 4,4 – DDD, 4,4 – DDE, 4,4 – DDT, Cadmium, Chromium, copper, lead, zinc, E-Coli, fecal coliform.

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sheet mentions that the purpose of MAL monitoring is to evaluate the effectiveness of a Permittee's stormwater management program in reducing pollutant loads from drainage areas as a means of determining compliance with the maximum extent practical (MEP) standard. It is also intended to evaluate the effectiveness of post-construction BMPs. The permit, however, does not explain how MAL monitoring will accomplish those ends. Further, it is not clear how MALs can evaluate post-construction BMPs. One basic question is where would MAL monitoring be performed: at the development or new development site, for which post-construction BMPs have been prescribed, or down stream from it?

Since MAL constituents are included in other stormwater monitoring requirements, the City will effectively be meeting this requirement. The permit's monitoring program also requires non-stormwater MAL compliance, which the City will comply with as part of its monitoring program.

1.7 New Development/Redevelopment Tracking

The PLDP requires tracking new development and redevelopment projects within 60 days after the permit's adoption (unless a permittee chooses to participate in watershed management program). Although not a monitoring requirement per se, permittees are nevertheless required to maintain a database containing the following information:

- name of the project and developer,
- project location and map (preferably linked to the GIS storm drain map),
- date of Certificate of Occupancy,
- 85th percentile storm event for the project design (inches per 24 hours),
- 95th percentile storm event for projects draining to natural water bodies

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- (inches per 24 hours), related to hydromodification
- other design criteria required to meet hydromodification requirements for drainages to natural water bodies,
- project design storm (inches per 24-hours),
- project design storm volume (gallons or MGD),
- percent of design storm volume to be retained on site
- design volume for water quality mitigation treatment BMPs, if any.
- if flow-through, water quality treatment BMPs are approved, provide the one year, one-hour storm intensity as depicted on the most recently issued isohyetal map published by the Los Angeles County Hydrologist,
- percent of design storm volume to be infiltrated at an off-site mitigation or groundwater replenishment project site
- percent of design storm volume to be retained or treated with bio-filtration at an off-site retrofit project,
- location and maps (preferably linked to the GIS storm drain map required in Part VII.A of this MRP) of off-site mitigation, groundwater replenishment, or retrofit sites documentation of issuance of requirements to the developer.

The City intends to meet this requirement through a revised SUSMP evaluation form.

1.8 Regional/Special Studies

The Southern California Stormwater Monitoring Coalition (SMC) Regional Watershed Monitoring Program was initiated in 2008. This program is conducted in collaboration with the Southern California Coastal Water Research Project (SCCWRP), State Water Board's Surface Water Ambient Monitoring Program, three Southern California Regional Water Quality Control Boards (Los Angeles, Santa Ana, and San Diego) and several county storm water agencies (Los Angeles, Ventura, Orange, Riverside, San Bernardino and San Diego). SCCWRP acts as the facilitator to organize the program and completes data analysis and report

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preparation. The SMC monitoring program seeks to coordinate and leverage existing monitoring efforts to produce regional estimates of condition, improve data comparability and quality assurance, and maximize data availability, while conserving monitoring expenditures. The primary goal of this program is to implement an ongoing, large - scale regional monitoring program for Southern California's coastal streams and rivers. The monitoring program addresses three main questions:

- What is the condition of streams in Southern California?;
- What are the stressors that affect stream condition?; and
- Are conditions getting better or worse?

In order to continue the implementation efforts of the SMC monitoring program, the City will support or provide monitoring data as described at the SMC sites within the Watershed Management Area(s) that overlap with the City's jurisdictional area.

1.9 Toxicity Monitoring

The MRP of the MS4 permit requires toxicity testing at the outfall and in the receiving water. The City will collect and analyze grab samples taken from receiving water monitoring locations to evaluate the extent and cause of toxicity in the receiving water. If toxicity is present in the receiving water, the City will perform toxicity testing on water samples taken from field screening (manhole sample) points to make sure that the toxicity is coming from the City's jurisdictional area. A sufficient number of samples specified in the MRP shall be collected to perform both the required toxicity test and TIE studies.

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1.9.1 Sensitive Spices Selection

The MRP states that a sensitivity screening is required to select the most sensitive test species unless "a sensitive test species has already been determined, or if there is prior knowledge of potential toxicant(s) and a test species is sensitive to such toxicant(s), then monitoring shall be conducted using only that test species." Previous relevant studies conducted in the watershed should be considered. Such studies may have been completed via previous MS4 sampling, wastewater NPDES sampling, or special studies conducted within the watershed. The following sub-sections discuss the species-section process for assessing aquatic toxicity in receiving waters.

1.9.2 Freshwater Sensitive Spices Selection

As described in the MRP, if samples are collected in receiving waters with salinity less than 1 part per thousand (ppt), or from outfalls discharging to receiving waters with salinity less than 1 ppt, toxicity tests should be conducted on the most sensitive species in accordance with *Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms.* The freshwater test species identified in the MRP are:

- A static renewal toxicity test with the fathead minnow, Pimephales promelas (Larval Survival and Growth Test Method 1000.04).
- A static renewal toxicity test with the daphnid, Ceriodaphnia dubia (Survival and Reproduction Test Method 1002.05).
- A static non-renewal toxicity test with the green alga, Selenastrum capricornutum (also named Raphidocelis subcapitata) (Growth Test Method 1003.0).

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The three test species were evaluated to determine if either a sensitive test species had already been established or, if there is prior knowledge of potential toxicant(s), to determine if a test species is sensitive to such toxicant(s). In reviewing the available data in the Dominguez Channel watershed, metals, historical organics, and pyrethroids have been identified as problematic and are generally considered the primary aquatic life toxicants of concern found in urban runoff. Given the knowledge of the presence of these potential toxicants in the watershed, the sensitivities of each of the three species were considered to evaluate which is the most sensitive to the potential toxicants in the watersheds.

As C. dubia is identified as the most sensitive to known potential toxicant(s) typically found in receiving waters and urban runoff in the freshwater portions of the watershed, it was chosen as the most sensitive species. This species also has the advantage of being easily maintained by means of in-house mass cultures. The simplicity of the test, the ease of interpreting results, and the smaller volume necessary to run the test, make it a valuable screening tool. The ease of sample collection and higher sensitivity will support assessing the presence of ambient receiving water toxicity or long term effects of toxic storm water over time.

As such, toxicity testing in the freshwater portions of the watershed will be conducted using C. dubia. However, C. dubia test organisms are typically cultured in moderately hard waters and can have increased sensitivity to elevated water hardness greater than 400 mg/L $CaCO_3$, which is beyond their typical habitat range. Because of this, in instances where hardness in site waters exceeds 400 mg/L ($CaCO_3$), an alternative test species may be used. Daphnia magna is more tolerant to high hardness levels and is a suitable substitution for C. dubia in these instances.

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1.9.3 Toxicity Identification Evaluation (TIE)

A toxicity test sample is immediately subject to TIE procedures to identify the toxic chemical(s), if either the survival or sub-lethal endpoint demonstrates a Percent Effect value equal to or greater than 50% at the IWC. Percent Effect is defined as the effect value denoted as the difference between the mean control response and the mean IWC response, divided by the mean control response, multiplied by 100. A TIE shall be performed to identify the causes of toxicity using the same species and test method and, as guidance, U.S. EPA manuals: Toxicity Identification Evaluation (TIE); Characterization of Chronically Toxic Effluents, Phase I (EPA/600/6 - 91/005F, 1992); Methods for Aquatic Toxicity Identification *Evaluations, Phase II* Toxicity Identification Procedures for Samples Exhibiting Acute and Chronic Toxicity (EPA/600/R - 92/081, 1993); and Marine Toxicity Identification Evaluation (TIE): Phase I Guidance Document (EPA/600/R - 96 - 054, 1996).

The TIE should be conducted on the test species demonstrating the most sensitive toxicity response at a sampling station. A TIE may be conducted on a different test species demonstrating a toxicity response with the caveat that once the toxicant(s) are identified, the most sensitive test species triggering the TIE shall be further tested to verify that the toxicant has been identified and addressed. A TIE Prioritization Metric (see Appendix 5 in SMC Model Monitoring Program) may be utilized to rank sites for TIEs.

1.9.4 Toxicity Reduction Evaluation (TRE)

When a toxicant or class of toxicants is identified through a TIE conducted at a receiving water monitoring station, the City shall analyze for

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the toxicant(s) during the next scheduled sampling event in the discharge from the outfall(s) upstream of the receiving water location. If the toxicant is present in the discharge from the outfall, at levels above the applicable receiving water limitation, a TRE shall be performed for that toxicant. The TRE shall include all reasonable steps to identify the source(s) of toxicity and discuss appropriate BMPs that have been identified; the City shall submit a TRE Corrective Action Plan to the Regional Water Board Executive Officer for approval. At a minimum, the plan shall include a discussion of the following:

- The potential sources of pollutant(s) causing toxicity.
- A list of municipalities and agencies that may have jurisdiction over sources of pollutant(s) causing toxicity.
- Recommended BMPs to reduce the pollutants(s) causing toxicity.
- Proposed post - construction control measures to reduce the pollutant(s) causing toxicity.
- Follow - up monitoring to demonstrate that the toxicants have been reduced or eliminated.

1.10 Chemical TMDL Monitoring

Chemical TMDL sampling will be performed at field screening points for stormwater discharges at least three times a year in accordance with the MRP. Sampling and analysis will be in keeping with USEPA guidance. In the Rio Hondo Reach 2 of the Los Angeles River, the constituents are flow, hardness, pH, dissolved oxygen, temperature, specific conductivity, TSS and SSC, Table E-2 pollutants, copper, lead, zinc, ammonia as N, Nitrite-N, Nitrite-N +nitrate-N, suspended sediments, e-coli, and trash. The San Gabriel River constituents include the same as the Rio Hondo Reach 2 with the exception of ammonia as N, Nitrite-N, Nitrite-N +nitrate-N, e-coli, and trash.

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The tables below specify each TMDL WLA to which the City is subject.

Table VI – List of Constituents

LAR – Rio Hondo Reach 2	SGR Reach 3
Flow, hardness, pH, dissolved oxygen, temperature, specific conductivity, TSS & SSC	Flow, hardness, pH, dissolved oxygen, temperature, specific conductivity, TSS & SSC
Table E-2 Pollutants	Table E-2 Pollutants
Cooper, Lead, Zinc	Cooper, Lead, Zinc
Ammonia as N, Nitrate-N, Nitrite-N, Nitrite-N + nitrate-N	-
Suspended Sediment: Copper, Lead, Silver, Zinc, Chlordane, DDT, PCBs & PAHs	Suspended Sediment: Copper, Lead, Silver, Zinc, Chlordane, DDT, PCBs & PAHs
E-coli	-
Trash	-

Table VII - Los Angeles River Watershed TMDLs (Including Tributary Reach 2 of the Rio Hondo)

Wet Weather WLAs				
Water Body	Copper	Lead	Zinc	Cadmium
Reach 2 Rio Hondo[2]	$1.5*10^{-8}$*daily volume(L)-9.5	$5.6*10^{-8}$*daily volume(L)-3.85	$1.4*10^{-7}$*daily volume(L)-83	$2.8*10^{-9}$*daily volume(L)-1.8
Water Body	Bacteria	Daily Maximum	Geometric Mean	
Reach 2 Rio Hondo	E-Coli	235/100mL	126/100 mL	
Water Body	NH3-N	NO3-N	NO2-N	NO3-N+NO2-N
Reach 2 Rio Hondo	10.1 mg/l	8 mg/L	1 mg/L	8 mg/L
Water Body	Trash	2014 (10%)	2015 (3.3%)	2016 (0%)
Reach 2 Rio Hondo	Gallons of uncompressed trash	1235	408	0

Table VIII - San Gabriel River Watershed TMDLs

Wet Weather WLA			
Water Body	**Copper**	**Lead**	**Zinc**
San Gabriel River Reach 2[3]	N/A	81.34 mg/l x daily storm volume (L)	N/A

[2]The State's 303(d) list does not show Reach 2 of the Rio Hondo as being impaired by any metal or for trash.
[3]The City does not drain into Reach 2 of the San Gabriel River.

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Table XI – Bacteria TMDL for Reach 2 of the Rio Hondo

1.11 TMDL Compliance Schedule

Tables III through VI below show the following compliance deadlines for: (1) interim and final TMDL waste load allocations (WLAs) for the metals and selenium TMDL for the San Gabriel River; (2) interim and final WLAs bacteria TMDL for Reach 2 of the Rio Hondo; (3) interim and final WLAs for the metals TMDL for the Rio Hondo; (4) interim and final nutrients TMDL WLAs for the Rio Hondo; and (5) trash TMDL for the Los Angeles River.

Table IX - San Gabriel River Metals and Selenium TMDL

TMDL Pollutant	Target	Interim WLA
All Metals	• 30% of the total drainage area meeting dry-weather WLAs & 10% meeting the wet-weather WLAs	September 30, 2017
	• 70% of the total drainage area meeting dry-weather WLAs & 35% meeting the wet-weather WLAs	September 30, 2020
TMDL Pollutant	**Target**	**Final WLA**
	• 100% of the total drainage area meeting dry-weather WLAs & 65% meeting the wet-weather WLAs	September 30, 2026

Table X - Metals TMDL for Reach 2 of the Rio Hondo

TMDL Pollutant	Target	Interim WLA
All Metals	• 75% drainage area meeting dry-weather WLA	January, 2020
	• 100% of the total drainage area meeting dry-weather WLAs & 50% meeting the wet-weather WLAs	January, 2024
TMDL Pollutant	**Target**	**Final WLA**
All Metals	• 100% total drainage area meeting dry & wet weather WLA	January, 2028

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TMDL Pollutant	Compliance Target	Interim WLA
Bacteria	• 75% drainage area meeting dry-weather WLA	January, 2020
	• 100% of the total drainage area meeting dry-weather WLAs & 50% meeting the wet-weather WLAs	January, 2024
TMDL Pollutant	**Compliance Target**	**Final WLA**
Bacteria	• 100% total drainage area meeting dry & wet weather WLA	January, 2028

Table XII – Nutrients for Reach 2 of the Rio Hondo

TMDL Pollutant	Compliance Target	Interim WLA
Nutrients	• None pending confirmation from Regional Board (nutrients are associated with POTWs	None
TMDL Pollutant	**Compliance Target**	**Final WLA**
Nutrients	• None pending confirmation from Regional Board (nutrients are associated with POTWs	None

Table XIII – Trash TMDL – Reach 2 of the Rio Hondo

Year	Implementation	Waste Load Allocation	Compliance Point
Sept 2008	Year 1	60% of Baseline Waste Load Allocations for the Municipal permittees and Caltrans	60% of the baseline load
Sept 2009	Year 2	50% of Baseline Waste Load Allocations for the Municipal permittees; and Caltrans	55% of the baseline load calculated as a 2-year annual average
Sept 2010	Year 3	40% of Baseline Waste Load Allocations for the Municipal permittees; and Caltrans	50% of the baseline load calculated as a rolling 3-year annual average
Sept 2011	Year 4	30% of Baseline Waste Load Allocations for the Municipal permittees and Caltrans	40% of the baseline load calculated as a rolling 3-year annual average
Sept 2012	Year 5	20% of Baseline Waste Load Allocations for the Municipal permittees; and Caltrans	30% of the baseline load calculated as a rolling 3-year annual average

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Sept 2013	Year 6	10% of Baseline Waste Load Allocations for the Municipal permittees; and Caltrans	20% of the baseline load calculated as a rolling 3-year annual average
Sept 2014	Year 7	0% of Baseline Waste Load Allocations for the Municipal permittees; and Caltrans	10% of the baseline load calculated as a rolling 3-year annual average
Sept 2015	Year 8	0% of Baseline Waste Load Allocations for the Municipal permittees; and Caltrans	3.3% of the baseline load calculated as a rolling 3-year annual average
Sept 2016	Year 9	0% of Baseline Waste Load Allocations for the Municipal permittees; and Caltrans	0% of the baseline load calculated as a rolling 3-year annual average

1.12 MAL Monitoring

Stormwater sampling against MAL analytes shall be performed at the same time stormwater monitoring is performed for other purposes and with the same frequency – three times during the wet season. The table below identifies the MAL analytes and their numeric limitations.

Table XIV - Municipal Action Levels

Metals	Unit	Total
Cadmium	ug/l	2.52
Chromium	ug/l	20.2
Copper	ug/l	71.12
Lead	ug/l	102
Zinc	ug/l	641.3
Nickel	ug/l	27.43
Conventional Pollutants	**Unit**	**MAL**
Total Phosphorus	mg/l	0.80
Nitrate & Nitrite	mg/l	1.85
Kjedahl Nitrogen (TKN)	mg/l	4.59
COD	mg/l	247.5
TSS	mg/l	264.1
pH	-	6 -9

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1.13 Action Level Monitoring

The tables below lists non-stormwater action level analytes for the Los Angeles River and San Gabriel River. As mentioned, the City does not intend to conduct action level or any other non-stormwater monitoring at the outfall. Such monitoring is not authorized under the Clean Water Act and is contrary to State Board water quality orders. Because non-stormwater discharges are not subject to an iterative process, an exceedance would place a permittee in violation. And, in the case of Reach 2 of the Rio Hondo, non-stormwater outfall sampling is physically impossible because outfalls are covered with heavy metallic flap gates that prevent non-stormwater from leaving the storm drain and entering the river. Further, these structural controls prevent pollutants in non-stormwater runoff from entering the river. Nevertheless, the City shall conduct non-stormwater monitoring to detect and eliminated illicit discharges and connections (see below Section 1.14).

Analyte	Units	Average Monthly	Daily Maximum
pH	Standard units	6.5-8.5[1]	
Total Coliform bacteria	#/100 ml	1000[2,3]	10,000[3,4]
Fecal Coliform Bacteria	#/100 ml	200[2]	400[4]
Enterococcus Bacteria	#/100 ml	35[2]	104[4]
Chloride	mg/L	150	--
Nitrite Nitrogen. Total (as N)	mg/L	1.0[5]	--
Sulfate	mg/L	350	--
Total Dissolved Solids	mg/L	1500	--
Turbidity	NTU	5[5]	--
Aluminum, Total Recoverable	ug/L	1.0[5]	--
Cyanide, Total Recoverable	ug/L	0.5	1
Copper, Total Recoverable	ug/L	2.9	5.8
Mercury, Total Recoverable	ug/L	0.051	0.1
Selenium, Total Recoverable	ug/L	58	117

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[1]Within the range of 6.5 to 8.5 at all times.
[2] Total coliform density shall ot ex d a geometric mean of 1,000/100 ml. Fecal coliform density shall not exceed a geometric mean of 200/100 ml. Enterococcus density shall not exceed geometric mean of 35/100 ml.
[3] In areas where shellfish may be harvested for human consumption, as determined by the Regional Water Board, the median total coliform density shall not exceed 70/100 ml and not e th 10 percent of the samples shall exceed 230/100 ml.
[4] Total coliform density in a sing sampl shall not exceed 10,000/100 ml. Fecal coliform density in a single sample shall not exceed 400/100 ml. Enterococcus density shall not exceed a geometric mean of 104/100 ml.
[5] Applicable only to scharges to receiving waters or receiving waters with underlying groundwater designated for Municipal and Domestic Supply (MUN) use as specified in Tables 2-1 and 2-2 of the Basin Plan.

Table XVI – Non-stormwater Action Levels San Gabriel River

Analyte	Units	Average Monthly	Daily Maximum
pH	Standard Units	6.0 – 9.0[1]	
Total Coliform bacteria	#/100 ml	1000[2,3]	10,000[3,4]
Fecal Coliform Bacteria	#/100 ml	200[2]	400[4]
Enterococcus Bacteria	#/100 ml	35[2]	104[4]
Chloride	mg/l	180	--
Nitrite Nitrogen. Total (as N)	mg/l	8	--
Sulfate	mg/l	300	--
TDS	mg/l	750	--
Aluminum, Total Recoverable	mg/l	1.0[6]	--
Cyanide, Total Recoverable	µg/L	0.5	1
Cadmium, Total Recoverable	µg/L	7.7	15
Copper, Total Recoverable	µg/L	2.9	5.8
Lead, Total Recoverable	µg/L	7	14
Selenium, Total Recoverable	µg/L	58	117
Nickel, Total Recoverable	µg/L	6.8	14
Silver, Total Recoverable	µg/L	1.1	2.2
Zinc, Total Recoverable	µg/L	47	95

[1]Within the range of 6 to 9 at all times.
[2] Total coliform density shall not exceed a geometric mean of 1,000/100 ml. Fecal coliform density shall not exceed a geometric mean of 200/100 ml. Enterococcus density shall not exceed a geometric mean of 35/100 ml.
[3] In areas where shellfish may be harvested for human consumption, as determined by the Regional Water Board, the median total coliform densi y shall not exceed 70/100 ml and not more than 10 percent of the samples shall exceed 230/100 ml.
[4] Total coliform density in a single sample shall not exceed 10,000/100 ml. Fecal coliform density in a single sample shall not exceed 400/100 ml. Enterococcus density shall not exceed a geometric mean of 104/100 ml.
[5] Applicable only to discharges to receiving waters or receiving waters with underlying groundwater designated for Municipal and Domestic Supply (MUN) use as specified in Tables 2-1 and 2-2 of the Basin Plan.

1.14 Additional Monitoring Required for WMP Compliance

MRP section VI.C.2.a.i and ii requires additional outfall monitoring tasks for permittees that opt for the WMP. They include pollutants that are currently not TMDLs but are nevertheless 303(d) listed (e.g. cyanide for Reach 2 of the Rio Hondo). Regional Board staff has suggested that other water quality standards be included that can be found in the previous MS4 in attachment U of the Monitoring Program.

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The purpose of this monitoring task is to identify non-TMDL pollutants that are causing impairments to beneficial uses of receiving waters and to evaluate the effectiveness of BMPs implemented through the SWMP/WMP. They are also included to determine if non-TMDL pollutants are causing or contributing to exceedances of receiving water limitations. The City takes the position that the detection of an exceedance does not constitute a violation. Any persistent exceedance of a TMDL or water quality standard monitored over the term of the permit would not constitute a violation provided that (1) the SWMP/WMP is being implemented in a timely and complete manner; and (2) complies with the iterative process described in MS4 permit section V.A.1-4.

Resulting data generated from WMP-related monitoring will be, along with TMDL monitoring, loaded into the water quality model. These pollutants will be added to the stormwater outfall sampling list.

Table XVII - WMP Monitoring for Non-TMDL Water Quality Standards

CONSTITUENTS	USEPA METHOD	MLs
CONVENTIONAL POLLUTANTS		**mg/L**
Oil and Grease	EPA 1664	5
Total Phenols	EPA 420.1	0.1
Cyanide	EPA 4500-CNC	0.005
pH	EPA 150.1	0 – 14
Temperature	NA	None
Dissolved Oxygen	NA	Sensitivity to 5 mg/L
BACTERIA		MPN/100ml
Total Coliform	SM 9221B	<20mpn/100ml
Fecal Coliform	SM 9222 B	<20mpn/100ml
Enterococcus	SM 9230 B	<20mpn/100ml
GENERAL		**mg/L**
Dissolved Phosphorus	SM 4500-PC	0.05
Total Phosphorus	SM 4500-PC	0.05
Turbidity	EPA 180.1	0.1NTU
Total Suspended Solids	EPA 160.2	2
Total Dissolved Solids	EPA 160.1	2
Volatile Suspended Solids	EPA 160.4	2

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Total Organic Carbon	SM 5310 B	1
Total Petroleum Hydrocarbon	EPA 1664	5
Biochemical Oxygen Demand	SMOL-5210	2
Chemical Oxygen Demand	SM 5220D	20-900
Total Ammonia-Nitrogen	EPA 350.2	0.1
Total Kjeldahl Nitrogen	EPA 351.2	0.1
Nitrate-Nitrite	EPA 4110	0.1
Alkalinity	EPA 310.1	2
Specific Conductance	EPA 120.1	1umho/cm
Total Hardness	EPA 130.2	2
MBAS	SM 5540 C	<0.5
Chloride	EPA 300	2
Fluoride	EPA 300	0.1
Methyl tertiary butyl ether (MTBE)	EPA 4110	1
Perchlorate	EPA 314.0	4 ug/l
METALS(Dissolved & Total)		**µg/L**
Aluminum	EPA 200.8	100
Antimony	EPA 200.8	0.5
Arsenic	EPA 200.8	1
Beryllium	EPA 200.8	0.5
Cadmium	EPA 200.8	0.25
Chromium (total)	EPA 200.8	0.5
Chromium (Hexavalent)	EPA 200.8	5
Copper	EPA 200.8	0.5
Iron	EPA 200.8	100
Lead	EPA 200.8	0.5
Mercury	EPA 1631	0.5
Nickel	EPA 200.8	1
Selenium	EPA 200.8	1
Silver	EPA 200.8	0.25
Thallium	EPA 200.8	1
zinc	EPA 200.8	1
SEMIVOLATILE ORGANIC COMPOUNDS		
ACIDS		**µg/L**
2-Chlorophenol	EPA 625	2
4-Chloro-3-methylphenol	EPA 625	1
2,4-Dichlorophenol	EPA 625	1
2,4-Dimethylphenol	EPA 625	2
2,4-Dinitrophenol	EPA 625	5
2-Nitrophenol	EPA 625	10
4-Nitrophenol	EPA 625	5
Pentachlorophenol	EPA 625	2
Phenol	EPA 625	1
2,4,6-Trichlorophenol	EPA 625	10

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BASE/NEUTRAL		µg/L
Acenaphthene	EPA 625	1
Acenaphthylene	EPA 625	2
Anthracene	EPA 625	2
Benzedine	EPA 625	5
1,2 Benzanthracene	EPA 625	5
Benzo(a)pyrene	EPA 625	2
Benzo(g,h,i)perylene	EPA 625	5
3,4 Benzoflouranthene	EPA 625	10
Bis(2-Chloroethoxy) methane	EPA 625	2
Bis(2-Chloroisoproply) ether	EPA 625	5
Bis(2-Chloroethyl) ether	EPA 625	2
Bis(2-Ethylhexl) phthalate	EPA 625	1
4-Bromophenyl Phenyl ether	EPA 625	5
Butyl benzyl phthalate	EPA 625	5
2-Chloroethyl vinyl ether	EPA 625	10
2-Chloronaphthalene	EPA 625	1
4-Chlorophenyl phenyl ether	EPA 625	10
Chrysene	EPA 625	5
Dibenzo(a,h)anthracene	EPA 625	5
1,3-Dichlorobenzene	EPA 625	0.1
1,4-Dichlorobenzene	EPA 625	1
1,2-Dichlorobenzene	EPA 625	1
3,3-Dichlorobenzidine	EPA 625	1
Diethyl phthalate	EPA 625	5
Dimethyl phthalate	EPA 625	2
di-n-Butyl phthalate	EPA 625	2
2,4-Dinitrotoluene	EPA 625	10
2,6-Dinitrotoluene	EPA 625	5
4,6 Dinitro-2-methylphenol	EPA 625	5
1,2-Diphenylhydrazine	EPA 625	5
di-n-Octyl phthalate	EPA 625	1
Fluoranthene	EPA 625	10
Fluorene	EPA 625	0.05
Hexachlorobenzene	EPA 625	0.1
Hexachlorobutadiene	EPA 625	1
Hexachloro-cyclopentadiene	EPA 625	5
Hexachloroethane	EPA 625	1
Indeno(1,2,3-cd)pyrene	EPA 625	0.05
Isophorone	EPA 625	1
Naphthalene	EPA 625	1
Nitrobenzene	EPA 625	0.2
N-Nitroso-dimethyl amine	EPA 625	5
N-Nitroso-diphenyl amine	EPA 625	1
N-Nitroso-di-n-propyl amine	EPA 625	5
Phenanthrene	EPA 625	0.05

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Pyrene	EPA 625	0.05
1,2,4-Trichlorobenzene	EPA 625	1
CHLORINATED PESTICIDES		**µg/L**
Aldrin	EPA 608	0.005
alpha-BHC	EPA 608	0.01
beta-BHC	EPA 608	0.005
delta-BHC	EPA 608	0.005
gamma-BHC (lindane)	EPA 608	0.02
alpha-chlordane	EPA 8270	0.1
gamma-chlordane	EPA 8270	0.1
4,4'-DDD	EPA 8270	0.05
4,4'-DDE	EPA 8270	0.05
4,4'-DDT	EPA 8270	0.01
Dieldrin	EPA 608	0.01
alpha-Endosulfan	EPA 608	0.02
beta-Endosulfan	EPA 608	0.01
Endosulfan sulfate	EPA 608	0.05
Endrin	EPA 608	0.01
Endrin aldehyde	EPA 608	0.01
Heptachlor	EPA 608	0.01
Heptachlor epoxide	EPA 608	0.01
Toxaphene	EPA 608	0.5
POLYCHLORINATED BIPHENYLS		**µg/L**
Aroclor-1016	EPA 608	0.5
Aroclor-1221	EPA 608	0.5
Aroclor-1232	EPA 608	0.5
Aroclor-1242	EPA 608	0.5
Aroclor-1248	EPA 608	0.5
Aroclor-1254	EPA 608	0.5
Aroclor-1260	EPA 608	0.5
Congeners3	EPA 8270C	NA
ORGANOPHOSPHATE PESTICIDES		**µg/L**
Atrazine	EPA 8141A/B	2
Chlorpyrifos	EPA 8141A/B	0.05
Cyanazine	EPA 8141A/B	2
Diazinon	EPA 8141A/B	0.01
Malathion	EPA 8141A/B	1
Prometryn	EPA 8141A/B	2
Simazine	EPA 8141A/B	2
HERBICIDES		**µg/L**
2,4-D	EPA 8151A	10
Glyphosate	EPA 8151A	5
2,4,5-TP-SILVEX	EPA 8151A	0.5
SOLIDS		**mg/L**
Total Suspended Solids (TSS)	SM 2540D	2
Suspended Sediment Concentration (SSC)	STM D3977-97C	NA
Volatile Suspended Solids	EPA 1684	2

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1.15 Non-stormwater Monitoring for IC/ID

As mentioned above, the City proposes to perform non-stormwater monitoring to detect and eliminate illicit connections and discharges in accordance with 40 CFR 122.26. Monitoring will consist of dry weather visual observations at outfalls or field screening points that shall be conducted monthly during the dry season (May 1 to September 30). If flow is detected, grab samples are to be taken within a 24 hour period and measured against fecal coliform, fecal streptococcus, surfactants (MBAS), residual chlorine, fluorides, and potassium. Other constituents may be added later based on USEPA's ICID-DE guidance manual.

1.16 Reporting Requirements

The City shall comply with all reporting requirements specified in the MRP. Currently TMDL reports for trash, nutrients, and TMDL constituents are reported with the MS4 permit annual report, which is due in December of each year. The City cannot begin to report monitoring results until: (1) the WMP and MRP have been approved by the Regional Board, (expected to happen 4 months after the June 28th WMP submittal date); and (2) one round of monitoring has been conducted during October 2014 to April 2015 wet season. Reporting results to the Regional Board will occur on or before December of 2015. By this time, it is expected that the County of Los Angeles will have developed a standardized annual report form that will include reporting criteria for the MS4 permit, TMDLs, MALs and certain water quality standards.

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1.17 Monitoring Protocols

The MRP requires a variety of monitoring requirements that are governed by monitoring protocols established by USEPA, which are summarized below.

I. *Receiving Monitoring Protocol*

Minimum required receiving water monitoring frequencies are defined in section VI.C of Attachment E in the MS4 Permit. Wet weather is defined as when the flow with the receiving water is at least 20% greater than the base flow. As per San Gabriel River Metals and Impaired Tributaries Metals and Selenium TMDL, wet weather is defined in San Gabriel Reach 2 and all upstream reaches and tributaries of San Gabriel River Reach 2 as when maximum daily flow of the river is equal to or greater than 260 cubicfeet per second (cfs) as measured at USGS 11085000, located at the bottom of Reach 3, just above the Whittier Narrows Dam. As per Los Angeles River and Tributaries Metals TMDL, wet weather is defined as any day when the maximum daily flow in the Los Angeles River is equal to or greater than 500 cfs measured at the Wardlow gage station. In an effort to simplify the wet weather definition, the City will utilize the definition in Attachment A of the MS4 Permit, which defines the wet season as the time period between October 1st and April 15th unless a storm event that is qualified to be targeted as the first event of the year is forecasted within a reasonable amount of time prior to October 1st. Wet weather monitoring will occur at least three times per year for all applicable parameters with the exception for aquatic toxicity. Aquatic toxicity monitoring will be conducted at a minimum of twice per year. The first wet weather event with a predicted rainfall of 0.25 inch and with a 70% probability 24 hours prior to rain fall will be targeted for

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monitoring. At a minimum two additional rainfall events with a minimum separation of three dry days (less than .1 inch of rain per day) between monitoring will be monitored to meet the minimum requirement of three storm events per year. Receiving water monitoring shall be coordinated to start as soon as possible following storm water outfall monitoring to better reflect the potential impact from MS4 discharges.

Dry weather monitoring requirements are defined in section VI.D of Attachment E in the MS4 Permit. Monitoring shall take place a minimum of two times per year for all parameters, or more if required by a TMDL monitoring plan. At least one of the monitoring events shall take place during the historically driest month of the year. Typically the driest month of the year is in August, which will be utilized for the time period of which at least one of the monitoring events occurs.

II. *Non-storm water outfall based sampling Protocol*

Dry weather samples will be collected on days when no measurable precipitation has occurred within the last three days. Grab samples will be taken for constituents that are required to be collected by grab sampling. If the City cannot install an automated sampler, grab samples will be collected. Flow will be estimated for storm water outfall monitoring sites based on drainage area, impervious cover, and precipitation data.

III. *Outfall Based sampling protocol*

For each field screening point, sample shall be collected of storm water discharge from three storm events occurring at least one month apart in accordance with the requirements indicated below:

- For storm water discharges, all samples shall be collected from and shall be taken each hour of discharge for the first 24 hours of flows when the receiving water is at least 20%

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greater than the base flow. For Dominguez Channel, wet weather is defined as any day when the maximum daily flow measured at a location within the Dominguez Channel is equal to or greater than 62.7 cfs, a flow-weighted composite the discharge or for the entire discharge if the storm event is less than 24 hours. The flow-weighted composite sample for a storm water discharge may be taken with a continuous sampler or as a combination of a minimum of three sample aliquots taken in each hour of discharge for the first 24 hours of the discharge or for the entire discharge if the storm event is less than 24 hours, with each aliquot being separated by a minimum period of twenty minutes. In addition, the City will target the first storm event of the storm year with a predicted rainfall of at least 0.25 inch with a 70% probability of at least 24 hours prior to the event start time. Another two wet weather samples will be taken when the predicted rain event is equal to or more than 0.1 inch and a minimum of 3 consecutive days of dry weather.

- Sampling of storm water from field screening points will take place during 24 hours of an event or, before the event ends, if less than 24 hours. A minimum of three grab samples separated by 15 minutes of each hour for a 24 hour event, or for the duration of the storm. If less than 24 hours, samples will be taken to create a flow weighted composite sample of the discharge from an outfall. Grab samples may be utilized for specific pollutants such as bacteria, oil & grease, volatile organics and cyanides. For all storm water permit applicants taking flow-weighted composites, quantitative data must be reported for all pollutants specified in §122.26 except pH, temperature, cyanide, total phenols, residual chlorine, oil and grease, fecal coliform, and fecal streptococcus.

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- A storm event that is greater than 0.1 inch and at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. For all applicants, a flow-weighted composite shall be taken for either the entire discharge or for the first three hours of the discharge. The flow-weighted composite sample for a storm water discharge may be taken with a continuous sampler or as a combination of a minimum of three sample aliquots taken in each hour of discharge for the entire discharge or for the first three hours of the discharge, with each aliquot being separated by a minimum period of fifteen minutes. For a flow-weighted composite sample, only one analysis of the composite of aliquots is required. For all storm water permit applicants taking flow-weighted composites, quantitative data must be reported for all pollutants specified in §122.26 except pH, temperature, cyanide, total phenols, residual chlorine, oil and grease, fecal coliform, and fecal streptococcus.

IV. *Toxicity Monitoring/Testing Protocol*

The approach to conducting aquatic toxicity monitoring is presented in Figure C-1, which describes a general evaluation process for each sample collected as part of routine sampling conducted twice per year in wet weather and once per year in dry weather. Monitoring begins in the receiving water and the information gained is used to identify constituents for monitoring at outfalls to support the identification of pollutants.

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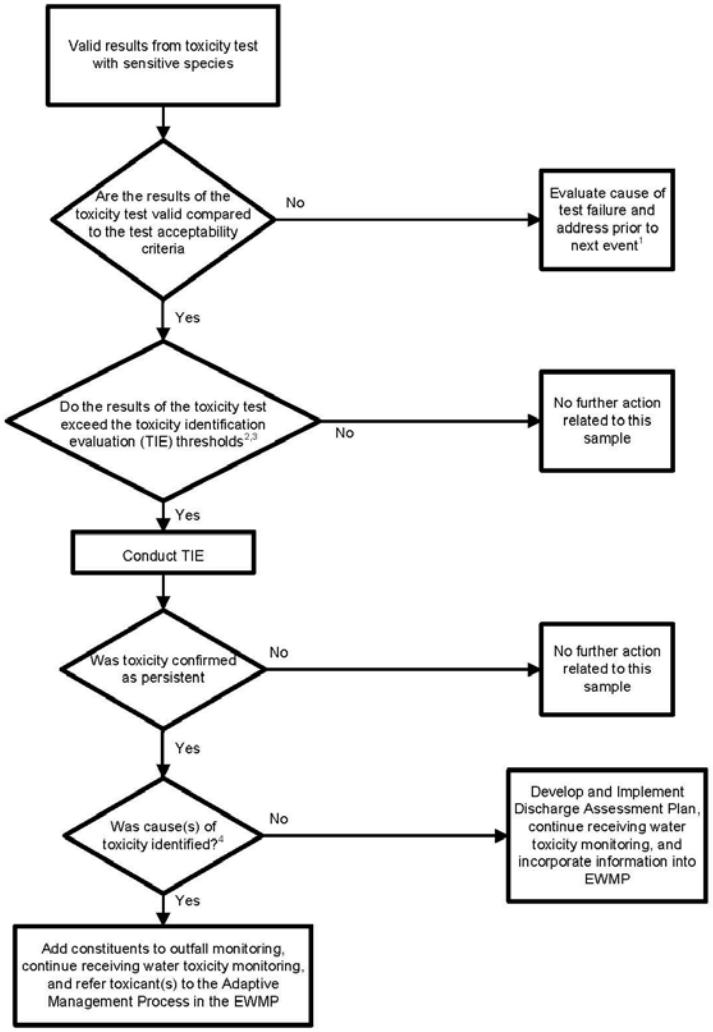
Figure C-1 – Aquatic Toxicity Monitoring Approach



Footnotes

1. Test failure includes pathogen or epibont interference, which should be addressed prior to the next toxicity sampling event. Additionally, lab control organisms may fail to meet test standards. As a result of test failure, toxicity samples will be collected during the next wet weather event, or as soon as possible following notification of test failure for dry event samples.
2. For freshwater, the TIE threshold is equal to or greater than 50% (≥50%) mortality in an acute (wet weather) or chronic (dry weather) test. If a ≥50% effect in a sub-lethal endpoint for chronic test is observed during dry weather, a follow up sample will be collected within two weeks of the completion of the initial sample collection. If the follow up sample exhibits a ≥50% effect, a TIE will be initiated.
3. For marine waters and estuarine waters, the TIE threshold is the percent effect value ≥50%. If a ≥50% or greater effect is observed during dry weather a follow up sample will be collected within two weeks of the initial sample collection and if the follow up sample exhibits a ≥50% effect, a TIE will be initiated.
4. The goal of conducting Phase I TIEs is to identify the cause of toxicity so that outfall monitoring can incorporate the toxicant(s) into the list of constituents monitored during outfall monitoring. Thus, if specific toxicant(s) or the analytical class of toxicants (i.e., metals that are analyzed via EPA Method 200.8) are identified, sufficient information is available to inform the addition of pollutants to the list of pollutants monitored during outfall monitoring.

1.18 Implementation Schedule (Milestones)

The table below provides a schedule for implementing MRP/CIMP tasks.

Table XVIII – Implementation Schedule

Task	Deadline Date
• Submit WMP, MRP, and CIMP to Regional Board	No later than June 28, 2014
• Using GIS mapping, provide land use overlay of City's storm drain system	No later than June 28, 2014
• Using GIS mapping, show City's storm drain system including catch basins and connections to receiving waters	No later than June 28, 2014
• Using GIS mapping, identify watersheds and sub-watersheds based on Los Angeles County's HUC 12 equivalent boundaries	No later than June 28, 2014
• Using GIS mapping identify groundwater recharge facilities into which City drains	No later than June 28, 2014
• Using GIS mapping, identify: stormwater outfalls and field screening points; mass emission and other in-stream monitoring points/stations; and ambient monitoring locations established by the Regional Board's Surface Water Ambient Monitoring Program (SWAMP); and locations established by the Council for Watershed Health.	No later than June 28, 2014
• Conduct outfall monitoring for stormwater discharges for TMDLs, other water quality standards, MALs, and toxicity three times beginning during 2015-2016 wet season and annually thereafter.	Beginning no later than October of 2015
• During the dry season, conduct monthly non-stormwater visual observations and grab sampling if flow is detected.	No later than May 1, 2015
• If no data exists the City shall contract for the CWH to conduct ambient monitoring once during the term of the permit for Reach 2, Rio Hondo and Reach 3 of the San Gabriel River (costs to be shared with the cities of Irwindale and West Covina).	No later than June 28, 2015
• Review available ambient monitoring data and studies to assess the health of the San Gabriel River (reaches 2 and above) and Reach 2 of the Rio Hondo	No later than June 28, 2014
• Submit annual monitoring reports to the Regional Board of any available TMDL or other water quality standards data generated through outfall monitoring.	Beginning no later than December of 2014
• Submit new development/redevelopment track form.	No later than one month following the Regional Board's approval of the CIMP

End Section

Revised Draft

Appendix A

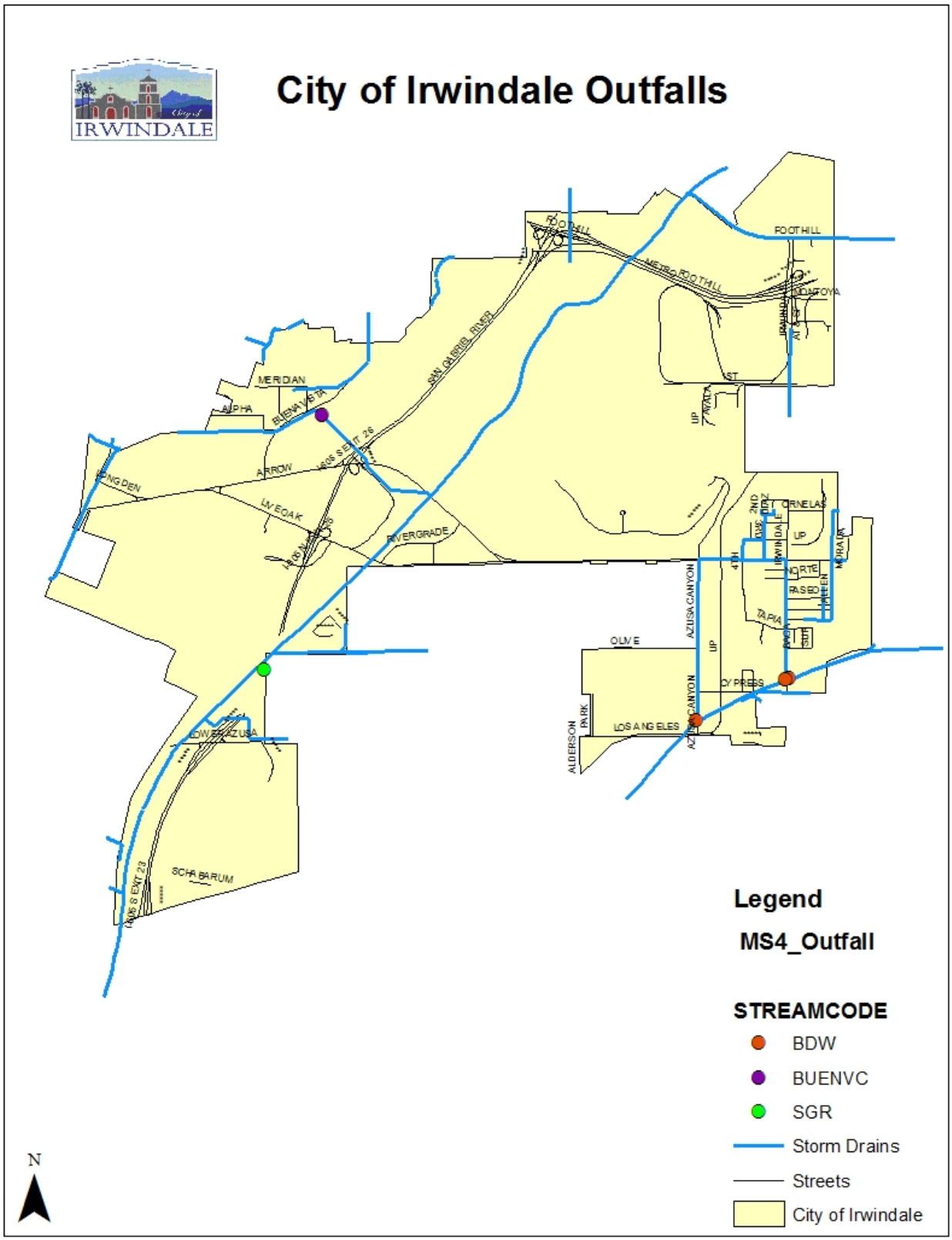
Maps

Revised Draft

Appendix A-1

Outfall
Location Map

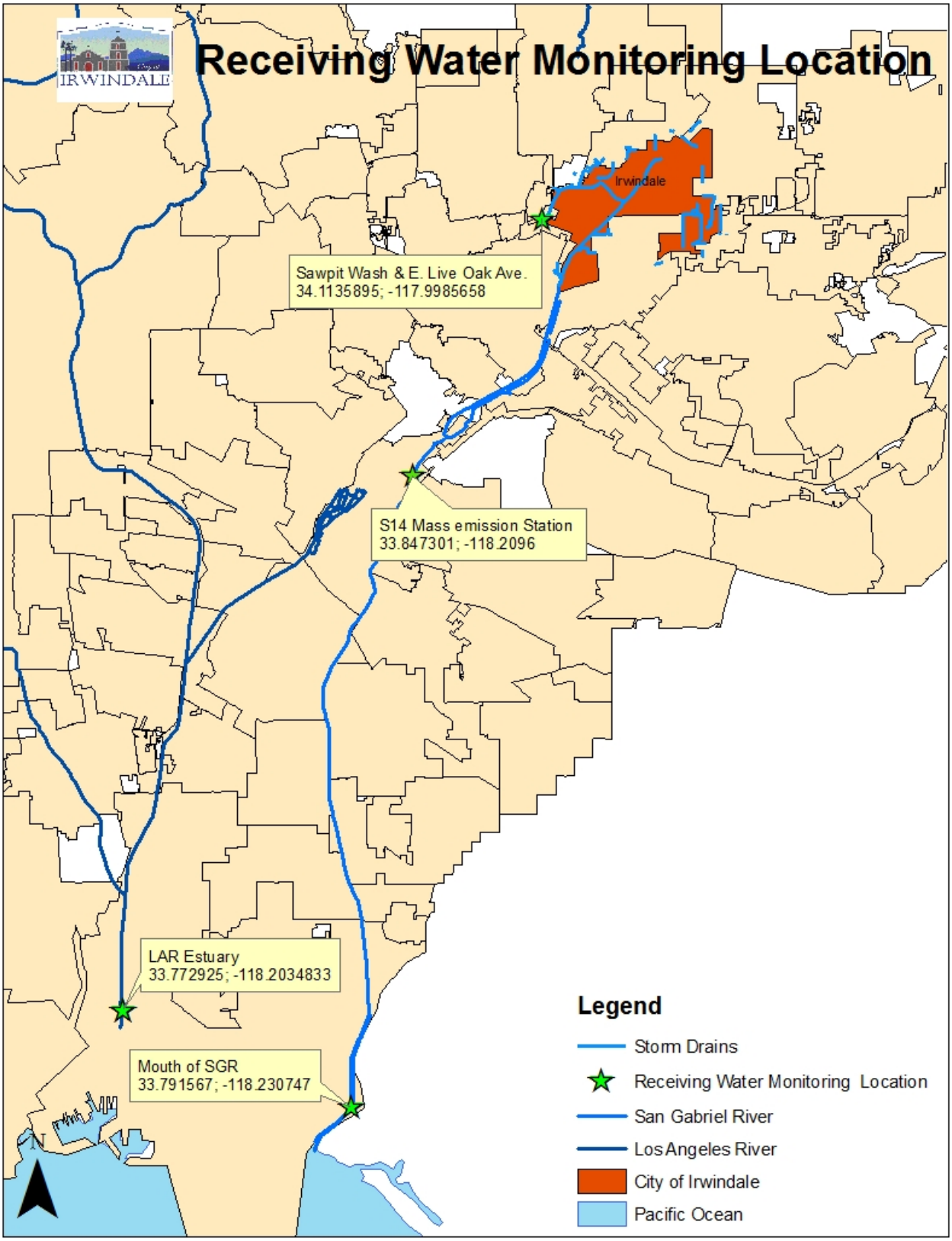
Revised Draft


City of Irwindale Outfalls
IRWINDALE
FOOTHILL
METRO FOOTHILL
SAN GABRIEL RIVER
MERIDIAN
ALPHA
BUENA VISTA
ARROW
LIVEOAK
RIVERGRADE
AZUSA CANYON
OLIVE
CYPRESS
LOS ANGELES
ALDERSON
PARK
SCHABARUM
Legend
MS4_Outfall
STREAMCODE
BDW
BUENVC
SGR
Storm Drains
Streets
City of Irwindale
N

Appendix A-2

Receiving Water Monitoring Locations

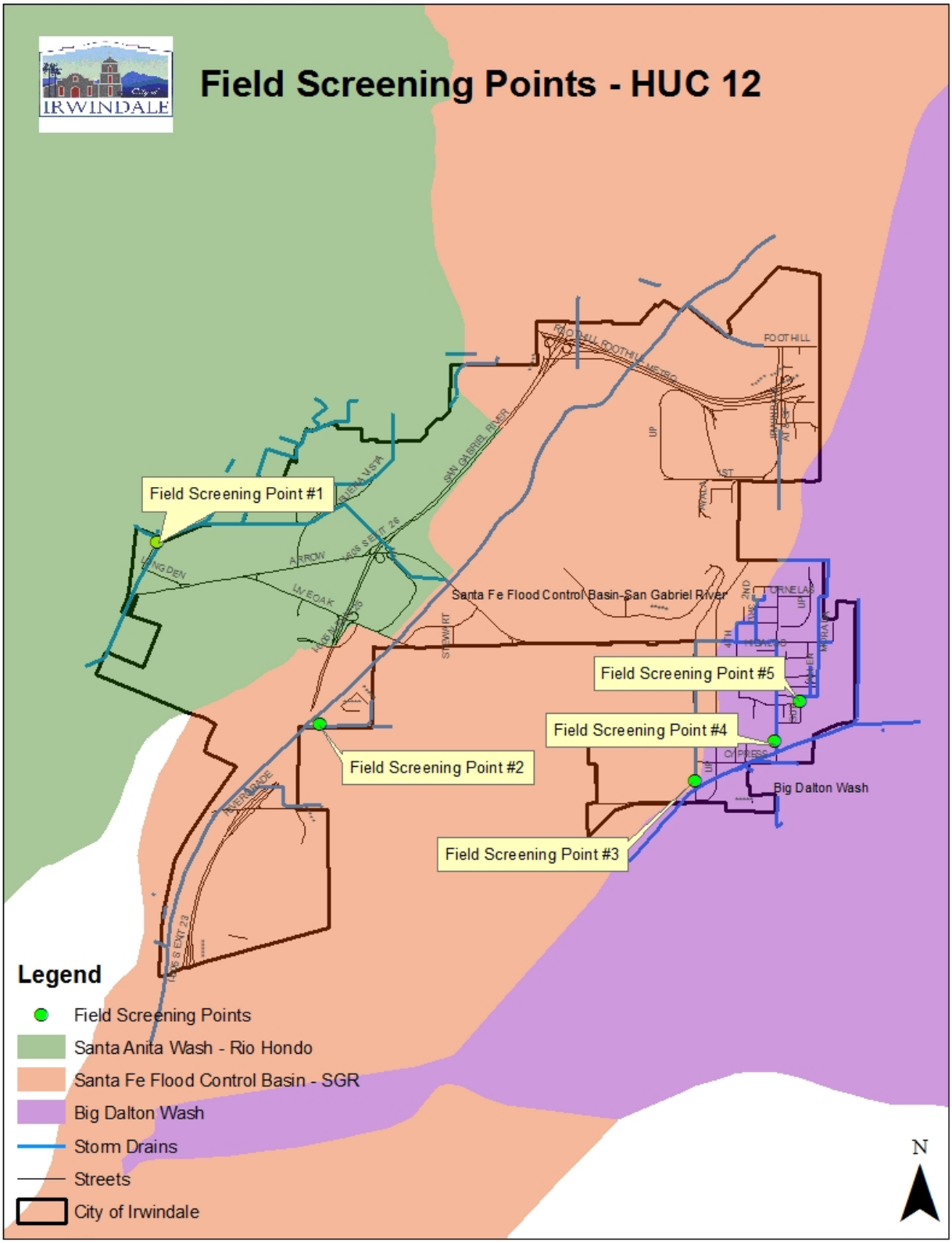
Revised Draft


Receiving Water Monitoring Location
IRWINDALE
Irwindale
Sawpit Wash & E. Live Oak Ave.
34.1135895; -117.9985658
S14 Mass emission Station
33.847301; -118.2096
LAR Estuary
33.772925; -118.2034833
Mouth of SGR
33.791567; -118.230747
Legend
Storm Drains
Receiving Water Monitoring Location
San Gabriel River
Los Angeles River
City of Irwindale
Pacific Ocean

Appendix A-3

Field Screening Point Locations
HUC 12

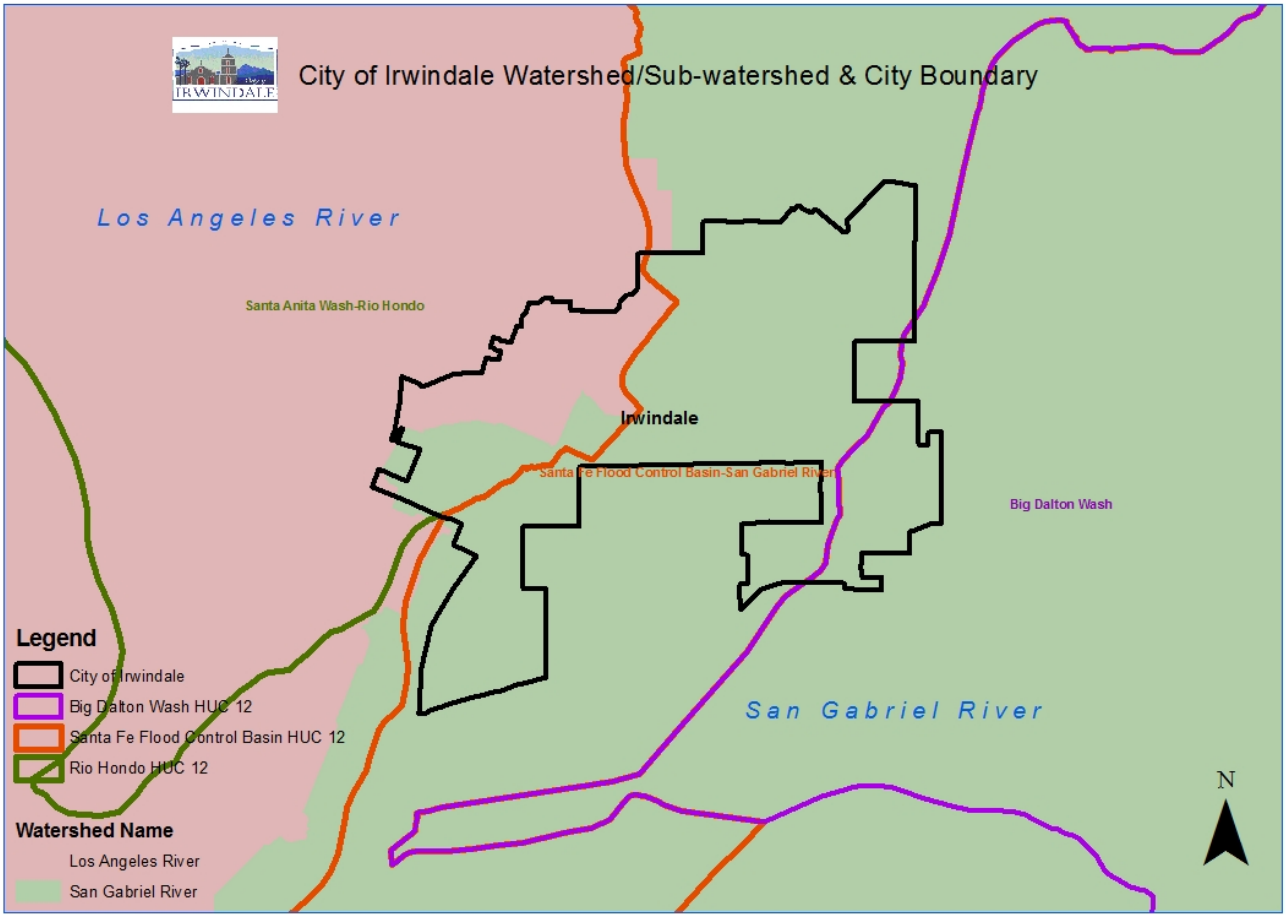
Revised Draft


Field Screening Points - HUC 12
Field Screening Point #1
Field Screening Point #2
Field Screening Point #3
Field Screening Point #4
Field Screening Point #5
Santa Fe Flood Control Basin-San Gabriel River
Big Dalton Wash
FOOTHILL
ARROW
LIVE OAK
STEWART
RIVERSIDE
SAN GABRIEL RIVER
Legend
Field Screening Points
Santa Anita Wash - Rio Hondo
Santa Fe Flood Control Basin - SGR
Big Dalton Wash
Storm Drains
Streets
City of Irwindale
N

Appendix A-4

Watershed/Subwatershed Map

Revised Draft


City of Irwindale Watershed/Sub-watershed & City Boundary
Los Angeles River
Santa Anita Wash-Rio Hondo
Irwindale
Santa Fe Flood Control Basin-San Gabriel River
Big Dalton Wash
San Gabriel River
N
Legend
City of Irwindale
Big Dalton Wash HUC 12
Santa Fe Flood Control Basin HUC 12
Rio Hondo HUC 12
Watershed Name
Los Angeles River
San Gabriel River

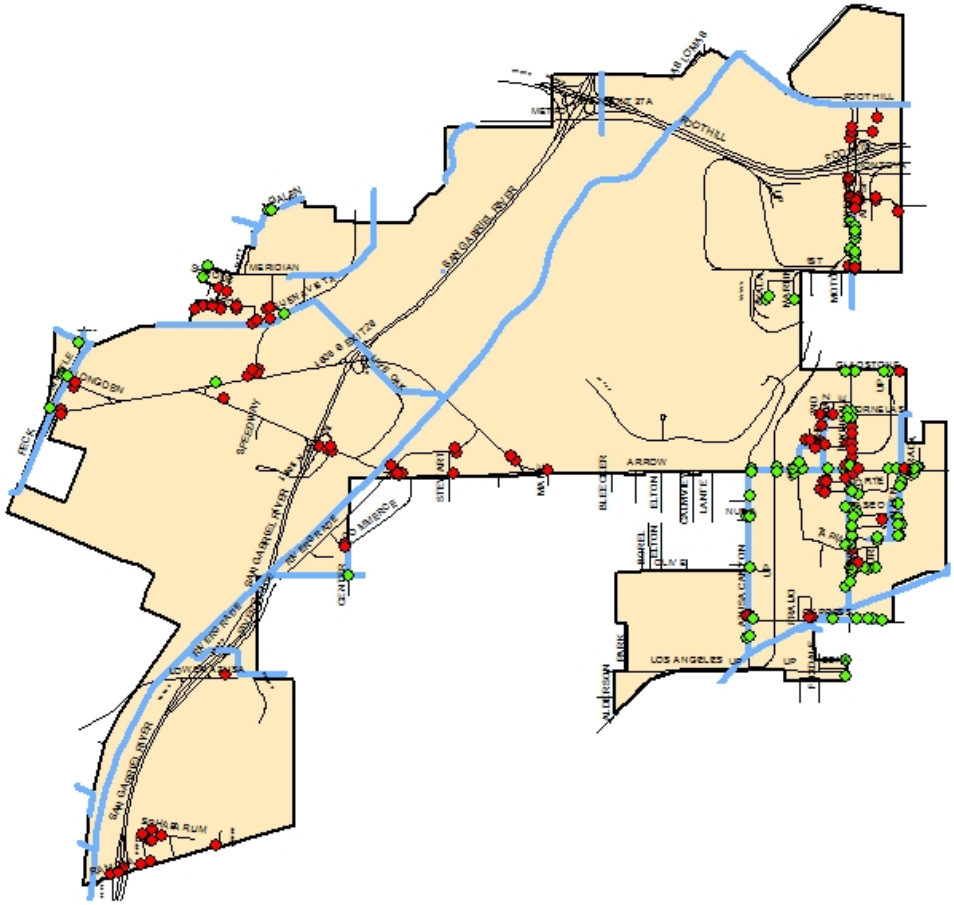
Revis

Appendix A-5

Storm Drain/Catch Basin Map

Revised Draft

Catch Basin Map



Legend

OWNERSHIP

- CITY
- LACFCD
- Storm Drain
- Street
- Irwindale

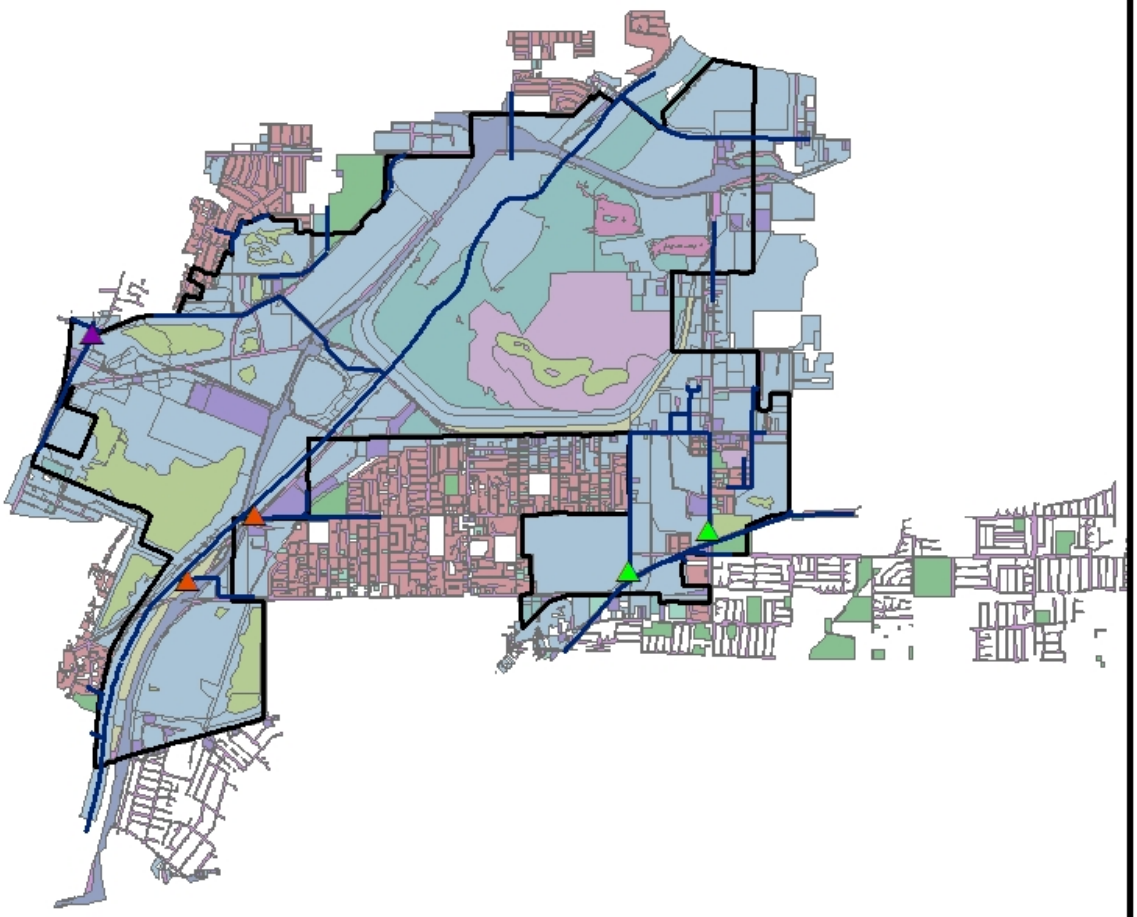
N

Appendix A-6

City Land Use Map

Revised Draft

Land Use Map



Legend

- Rio Hondo Channel
- SGR
- Big Dalton Wash
- Storm Drains
- City of Irwindale

Land Use

- Agriculture moderate slope D
- Commercial
- HD single family residential
- Industrial
- Institutional
- LD single family residential moderat
- LD single family residential steep s
- Multifamily residential
- Secondary Roads
- Transportation
- Vacant moderate slope D
- Vacant steep slope D
- Water

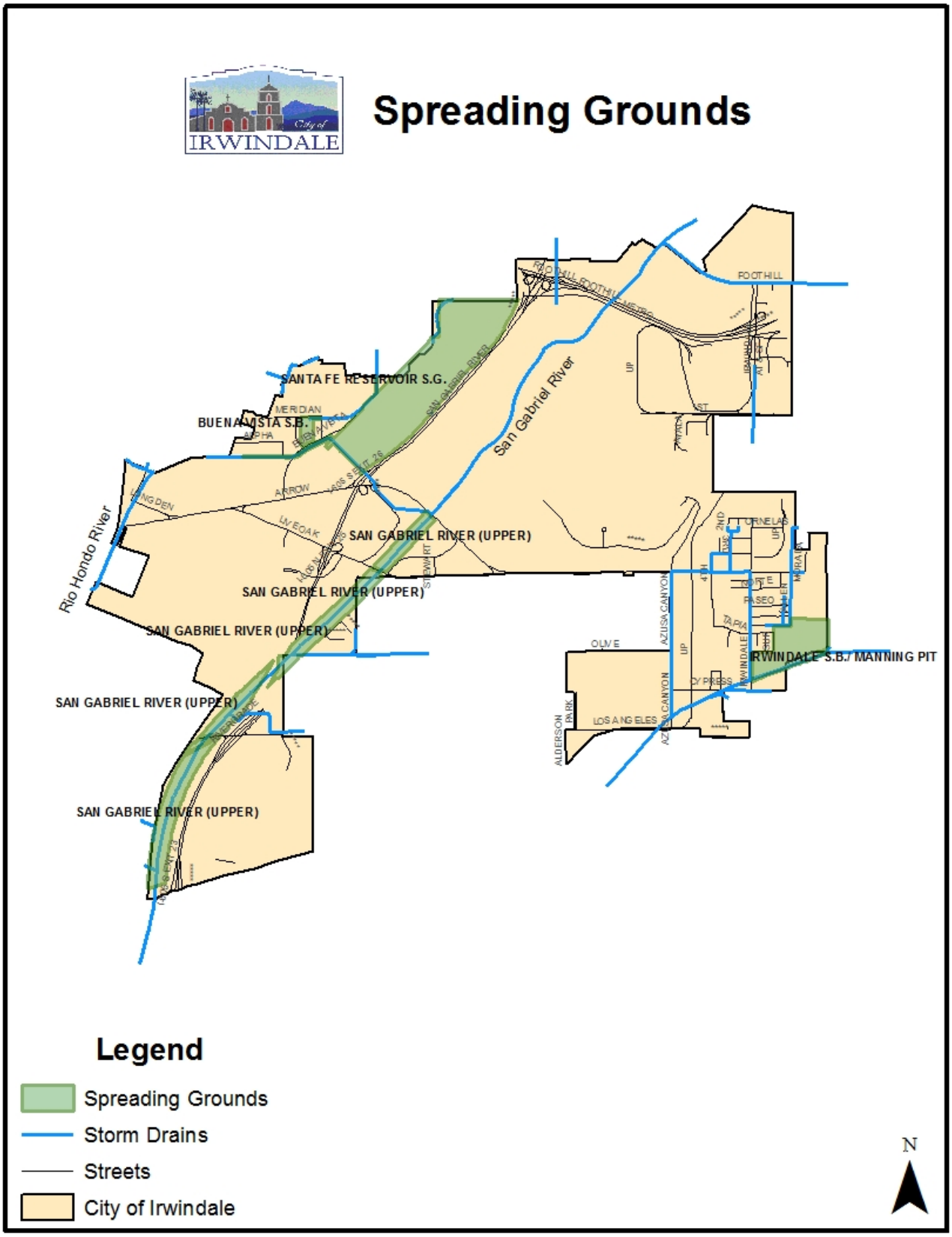
N

Appendix A-7

Spreading Grounds Location Map

Revised Draft

Spreading Grounds



Appendix B

2010 303(d) List for Los Angeles and San Gabriel Rivers and Tributaries

Revised Draft

Appendix B

Table I – 303(d) List - San Gabriel River and Tributaries

2010 303 (d) List			
Reach	**Parameter**	**TMDL Status Date**	**Source**
SG River Reach 3 Whittier Narrows Dam	Indicator Bacteria	2021	Unknown
Walnut Creek (Drains from Puddingstone Reservoir)	Indicator Bacteria	2021	Unknown
	Benthic-Macro inverte-brate Bioassessment	2012	Unknown
	pH	2007	Unknown

Table II – 303(d) List, Reach 2, Rio Hondo

2010 303 (d) List			
Reach	**Parameter**	**TMDL Status Date**	**Source**
Rio Hondo Reach 2 at Spreading Grounds	Coliform Bacteria	2009	Nonpoint/Point Source
	Cyanide	2021	Unknown

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