



Los Angeles Regional Water Quality Control Board

February 23, 2015

Ms. Carolyn Lehr, City Manager
City of Rancho Palos Verdes
30940 Hawthorne Boulevard
Rancho Palos Verdes, CA 90275

Mr. Anton Dahlerbruch, City Manager
City of Palos Verdes Estates
340 Palos Verdes Drive West
Palos Verdes Estates, CA 90274

Mr. Raymond R. Cruz, City Manager
City of Rolling Hills
2 Portuguese Bend Road
Rolling Hills, CA 90274

Mr. Douglas R. Prichard, City Manager
Rolling Hills Estates
4045 Palos Verdes Drive North
Rolling Hills Estates, CA 90274

Ms. Gail Farber, Director
County of Los Angeles
Department of Public Works
Watershed Management Division, 11th Floor
900 South Fremont Avenue
Alhambra, CA 91803

Ms. Gail Farber, Chief Engineer
Los Angeles County Flood Control District
Department of Public Works
Watershed Management Division, 11th Floor
900 South Fremont Avenue
Alhambra, CA 91803

REVIEW OF THE PALOS VERDES PENINSULA COORDINATED INTEGRATED MONITORING PROGRAM, PURSUANT TO PART VI.B AND ATTACHMENT E, PART IV.B OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175)

Dear Permittees participating in the Palos Verdes Peninsula CIMP Group:

The Regional Water Board has reviewed the monitoring program submitted on June 27, 2014 by the Palos Verdes Peninsula CIMP Group (PV Peninsula CIMP Group) for the Cities of Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills and Rolling Hills Estates, and the County of Los Angeles and the Los Angeles County Flood Control District. This monitoring program was submitted pursuant to the provisions of NPDES Permit No. CAS004001 (Order No. R4-2012-0175), which authorizes discharges from the municipal separate storm sewer system (MS4) operated by 86 municipal Permittees within Los Angeles County (hereafter, LA County MS4 Permit). The LA County MS4 Permit allows Permittees the option to develop and implement, in coordination with an approved Watershed Management Program per Part VI.C, a customized monitoring program that achieves the five Primary Objectives set forth in Part II.A of Attachment E and includes the elements set forth in Part II.E of Attachment E. Customized monitoring programs may be developed on an individual jurisdictional basis, referred to as an Integrated Monitoring Program (IMP), or on a watershed basis, referred to as a Coordinated Integrated Monitoring Program (CIMP). These programs must be approved by the Executive Officer of the Regional Water Board.

The Regional Water Board has reviewed the PV Peninsula CIMP Group's monitoring program and has determined that the monitoring program submitted did not include sufficient detail regarding some of the elements set forth in Part II.E to achieve the Primary Objectives as set forth in Part II.A of Attachment E of the LA County MS4 Permit. In particular, the CIMP was not clear as to whether dry weather receiving water monitoring will be conducted twice a year or only if triggered by significant non-stormwater flow from a contributing outfall. In addition, the CIMP does not appear to include a monitoring and reporting program for storm-borne sediments as required by the Santa Monica Bay TMDL for DDTs and PCBs. The Regional Water Board's comments on the PV Peninsula CIMP, including detailed information concerning necessary additions and revisions to the CIMP, are found in Enclosure 1 and Enclosure 2.

Additionally, through this letter, the Regional Water Board is approving the following requests related to TMDL monitoring programs:

- In September of 2013, the Cities of Palos Verdes Estates, Rolling Hills Estates and Rolling Hills requested that the Executive Officer approve an exemption from the requirement to prepare and implement a Plastic Pellet Monitoring and Reporting Plan (PMRP) as required by the Santa Monica Bay Nearshore and Offshore Debris TMDL.
- On January 14, 2015, the City of Rancho Palos Verdes requested that the Executive Officer approve an exemption from the requirement to prepare and implement a PMRP as required by the Santa Monica Bay Nearshore and Offshore Debris TMDL.
- As part of the CIMP, the PV Peninsula CIMP group requested the following modifications to the Machado Lake Nutrient TMDL monitoring program:
 - Discontinue monitoring at the Los Angeles County sites "10-ACAD" and "10-EAST," since these monitoring sites are upstream of the PV Peninsula Cities' monitoring location "RHE City Hall;"
 - Discontinue monitoring at the Los Angeles County site "20-SCGB," since the results from initial monitoring have consistently shown that flow has not been present.
 - The County of Los Angeles requested to demonstrate compliance with the Machado Lake Nutrient TMDL with the concentration-based monthly average WQBELs for total nitrogen and total phosphorus.
- Also as part of the CIMP, the PV Peninsula CIMP group requested a modification to the Machado Lake Pesticides and PCBs TMDL monitoring program. When insufficient filtered suspended sediment is collected at a monitoring site, the Regional Water Board approves of compositing sediment samples collected from the same location during subsequent storm events within a single storm-year.

Through this letter, the Regional Water Board is denying the following request related to the Machado Lake Nutrient TMDL Monitoring Program:

- As part of the CIMP, the PV Peninsula CIMP group requested to discontinue monitoring at the "Lariat" sampling location.
- As part of the CIMP, the PV Peninsula CIMP group requested to discontinue dry weather monitoring at the "Solano" sampling location.

See Enclosure 1 for more details regarding these approvals and disapprovals related to specific TMDL monitoring requirements.


Please make the necessary additions and revisions to the CIMP, as identified in the enclosures to this letter, and submit the revised CIMP as soon as possible and no later than **May 23, 2015**. The revised CIMP must be submitted to losangeles@waterboards.ca.gov with the subject line "LA County MS4 Permit – Revised PV Peninsula Coordinated Integrated Monitoring Program" with a copy to Ivar.Ridgeway@waterboards.ca.gov and Rebecca.Christmann@waterboards.ca.gov.

Upon approval of the revised CIMP by the Executive Officer, the PV Peninsula CIMP Group must prepare to commence the monitoring program within 90 days. If the necessary revisions are not made, the PV Peninsula CIMP Group must comply with the Monitoring and Reporting Program and future revisions thereto, in Attachment E of the LA County MS4 Permit.

Until the PV Peninsula CIMP is approved by the Executive Officer, the monitoring requirements pursuant to Order No. 01-182 and Monitoring and Reporting Program CI 6948, and pursuant to approved TMDL monitoring plans shall remain in effect for the PV Peninsula CIMP Group.

If you have any questions, please contact Ms. Rebecca Christmann of the Storm Water Permitting Unit by electronic mail at Rebecca.Christmann@waterboards.ca.gov or by phone at (213) 576-5734. Alternatively, you may also contact Mr. Ivar Ridgeway, Chief of the Storm Water Permitting Unit, by electronic mail at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,


Samuel Unger, P.E.
Executive Officer

cc: Andy Winje, City of Rancho Palos Verdes
Allan Rigg, City of Palos Verdes Estates
Yolanta Schwartz, City of Rolling Hills
Greg Grammer, City of Rolling Hills Estates
Angela George, County of Los Angeles, Department of Public Works
Gary Hildebrand, Los Angeles County Flood Control District

Enclosures: Enclosure 1 – Summary of Comments and Required Revisions
Enclosure 2 – Comments on Aquatic Toxicity Testing

Los Angeles Regional Water Quality Control Board

**Enclosure 1 to February 23, 2015 Letter Regarding the Palos Verdes Peninsula CIMP Group
Draft Coordinated Integrated Monitoring Program,
Pursuant to Part VI.B and Attachment E, Part IV.B of the LA County MS4 Permit
(Order No. R4-2012-0175)**

**Summary of Comments and Required Revisions to the
Draft Coordinated Integrated Monitoring Program**

CIMP Reference	MRP Element/ Reference (Attachment E)	Summary of Comments and Necessary Revisions
General Comments		
Section 1.3, Table 1-2, pg. 11	Attachment E Part II.E.1 page E-4	Table 1-2, which lists the water bodies and beneficial uses within the area addressed by the PV Peninsula Group CIMP needs to include "Coastal Streams of Palos Verdes," "Canyon Streams of Palos Verdes," and "Point Vicente Beach." In addition, the revised CIMP needs to clarify if the first row "Los Angeles Coastal" is referring to the Nearshore Zone or the Offshore Zone. Both the Los Angeles County Coastal Nearshore Zone and the Los Angeles County Coastal Offshore Zone have designated REC1 and REC2 beneficial uses (BUs) as listed in Table 2-1a of the Water Quality Control Plan, Los Angeles Region (Basin Plan) and additional BUs as listed in Table 2-3 of the Basin Plan, and both should be included in Table 1-2.
Receiving Water Monitoring		
Section 1.4.1.1, pp. 14-15 and Section 1.4.2.1, pp. 16-18	Attachment E Part VI.B.2.a-b page E-14	The PV Peninsula CIMP Group cites other monitoring plans such as the <i>Coordinated Compliance Monitoring and Reporting Plan Incorporating Quality Assurance Project Plan Components for Greater LA and LB Harbor Waters</i> and <i>Updated Monitoring and Reporting Plan and Quality Assurance Project Plan for Combined Machado Lake Nutrient and Toxics TMDL</i> . Where the PV Peninsula CIMP Group intends to use existing monitoring plans to meet the requirements of the LA County MS4 Permit, including TMDL monitoring requirements, this should be clearly stated along with a description of the PV Peninsula CIMP Group's roles and responsibilities within the monitoring plan. For example, the CIMP should identify compliance monitoring locations, monitoring parameters, and monitoring frequency for wet and dry weather events conducted as part of the Machado Lake Toxics TMDL and the Greater LA and LB Harbor Waters Toxics TMDL. In addition, the existing monitoring plans should be included as appendices to the CIMP, so that all monitoring program elements can be found within a single document.

CIMP Reference	MRP Element/ Reference (Attachment E)	Summary of Comments and Necessary Revisions
Section 2.1.1, pp. 25-26	Attachment E Part VI.B.2.c page E-14	There are no “point zero” monitoring locations within the PV Peninsula CIMP Group’s jurisdictional area. Therefore, a point zero sampling location needs to be established within the PV Peninsula CIMP Group’s jurisdiction. The Regional Water Board recommends either utilizing the previous observation site, SMB-O-9, identified in the SMBBB TMDL CSMP or, alternatively, moving SMB 7-1 to the mouth of Malaga Creek as the point zero sampling location. The new SMB Beaches Bacteria TMDL compliance location will be subject to the reference system criterion for allowable exceedance days until sufficient data are collected to evaluate whether the site should alternatively be subject to the antidegradation criterion. The new shoreline monitoring location shall be sampled for three bacterial indicators (total coliform, fecal coliform (or <i>E. coli</i>) and enterococcus) five (5) times per week pursuant to Part VI.B.2.c of Attachment E. After one (1) year of sampling the Permittees may request a reduction of the sampling frequency based on the exceedance rate.
Section 2.1.3, pg. 28	Attachment E Part VI.C.1.b.i-iii, page E-15	Footnote 7 on page 28 of the CIMP shall either be deleted or changed to be consistent with the definition of “storm year” provided in Section 1.2 on page 7 of the CIMP. Note that the permit requirement is to sample the first eligible storm event of the fall, which may occur prior to November 1 st .
Section 2.1.3, Table 2-3, pg. 29	Attachment E Parts VI.D.1.b.i page E-16	The dry weather monitoring requirements in Table 2-3 shall be revised to indicate that the dry weather determination will be based on measurements from 50% or more of the rain gauges <i>within the PV Peninsula Group area</i> unless sufficient justification is provided for an alternate approach.
Table 2-3, & Section 2.2, Table 2-4, pp. 29-30 and Appendix A	Attachment E Parts VI.C.1.d and VI.D.1.c pages E-16 to E-17	The revised CIMP shall include receiving water monitoring for TSS during wet and dry weather conditions. Tables 2-3, 2-4, and the table in Appendix A must be updated as appropriate.
Section 2.2, Table 2-4, Footnote b, pg. 30	Attachment E Part XII.G.3., page E-32	Footnote b of Table 2-4 states, “Toxicity is required to be monitored in the receiving water twice per year during wet weather and once per year during dry weather in the month of June. Screening for toxicity test parameters will occur once during the Permit term.” Attachment E, Part XII.G.3 of the LA MS4 Permit states, “Rescreening shall occur in the fourth year of the permit term.” The draft CIMP needs to be revised to be consistent with the rescreening requirement.
Section 2.1.3, pp. 27-28	Attachment E Part VI.D.1.a page E-16	The draft CIMP states, “Dry weather monitoring will not be conducted at a given receiving water monitoring site if non-stormwater outfall screening indicates that there are no significant non-stormwater flows contributing to the given receiving water monitoring site.” However,

CIMP Reference	MRP Element/ Reference (Attachment E)	Summary of Comments and Necessary Revisions
		<p>the objectives of the dry weather receiving water monitoring program include more than just determining whether a non-storm water discharge is causing or contributing to an exceedance of the receiving water quality, as the CIMP acknowledges in section 1.4.1.</p> <p>The revised CIMP needs to clearly indicate that dry weather receiving water monitoring will be conducted as required in Attachment E, Part VI.D of the LA County MS4 Permit, or indicate how these monitoring objectives are being met for the receiving water adjacent to the PV Peninsula by another program(s).</p>
Outfall Database		
Section 4.1, pp. 41-43	Attachment E Part VII.A pp. E-20 - E-21	The revised CIMP needs to include the source(s) of the Geographic Information System (GIS) data used to generate the maps and database. In addition, submit the GIS database per the requirements in Attachment E, Part VII.A of the LA County MS4 Permit.
Storm Water Outfall Based Monitoring		
Section 3.1.2, Table 3-2, page 34	Attachment E, Part VIII.A.2.b page E-21	The revised CIMP needs to report the acreage of each proposed outfall's drainage area and the acreage and percentage of each land use within each outfall drainage area.
Table 3-3, & Section 3.3, & Table 3-4, pp. 35-37 and Appendix A	Attachment E Part VIII.B.1.c pp. E-22 & E-23	<p>The revised CIMP shall include monitoring of TSS at all three stormwater outfall monitoring locations. In addition, PAHs shall be monitored at the stormwater outfall monitoring site "Rolling Hills Estates (RHE) City Hall."</p> <p>The revised CIMP shall also include storm water outfall monitoring for pollutants not addressed by a TMDL, but identified on the CWA section 303(d) list for the receiving water or downstream receiving waters. Wilmington drain is 303(d) list for copper, lead and coliform bacteria; therefore, outfall monitoring site RHE City Hall shall include monitoring for fecal indicator bacteria. Tables 3-3, 3-4, and the table in Appendix A must be updated as appropriate.</p>
Section 3.3, Table 3-4, pp. 35-37 and Appendix A	Attachment E Part VIII.B.1.c.ii pp. E-22 & E-23	For completeness, Table 3-4 on page 37 needs to include the monitoring parameters: copper, lead, mercury, zinc, chlordane, dieldrin, benzo(a)pyrene and PAH, which will be monitored at RHE City Hall.
Section 3.4, pg. 37 and Appendix C, Sections 2.1, 2.5.1 & 2.5.2	Attachment E Part VIII.C page E-23	Appendix C of the draft CIMP indicates that time-weighted composites will be collected, but that the sample aliquots that will comprise the composite will only be collected during the first two hours of the storm. The revised CIMP needs to require the sampling of the first 24 hours of the storm water discharge or the entire storm water discharge if it is less than 24 hours as outlined in Attachment E, Part VIII.C.2 unless sufficient justification is provided for sampling only the

CIMP Reference	MRP Element/ Reference (Attachment E)	Summary of Comments and Necessary Revisions
		first two hours of the storm.
Non-Stormwater Outfall Based Monitoring		
Section 4.2 pg. 43	Attachment E Part IX.B.1 page E-24	The CIMP proposes to perform one non-storm water outfall screening on all major outfalls as defined in the Permit. After the initial screening, outfalls where there was “flow greater than a trickle” will be screened two more times; however, the CIMP did not provide a schedule of when these screenings will take place. The revised CIMP needs to provide a schedule of non-storm water screenings, which shall address any potential seasonal variations of non-storm water discharges.
Section 4.2 pg. 43	Attachment E Part IX.B.2 page E-24	The revised CIMP must include a process for reassessing the non-storm water outfall screening and monitoring plan within the current permit term pursuant to Attachment E, Part IX.B.2.
Section 4.6 pg. 46, Part B	Attachment E Part IX.E page E-26	The revised CIMP shall include the following underlined language, which addresses reporting: “If the source is determined to be an NPDES permitted discharge, a discharge subject to Comprehensive Environmental, Response, Compensation, and Liability Act (CERCLA), or a conditionally exempt essential discharge, the appropriate agency must document the source <u>and report to the Regional Water Board in the next annual report.</u> ”
Section 4.7.2 and Table 4-4, pp. 48-49	Attachment E Part IX.G pp. E-27 & E-28	<p>The revised CIMP needs to comply with the non-storm water monitoring requirements as contained in Attachment E, Part IX.G of the LA County MS4 Permit, which includes either monitoring of significant non-storm water discharges four times per year for the first year of monitoring or at the frequency specified in an approved TMDL monitoring plan unless sufficient justification is provided for an alternate frequency.</p> <p>In addition, Table 4-4 of the revised CIMP needs to specifically list the pollutants assigned TMDL WLAs and the receiving water pollutants identified on the 303(d) list, which will be monitored as part of the non-storm water outfall monitoring program.</p>
Section 4.2, pg. 43	Attachment E Part IX.H.1 page E-28	Section 4.2 states, “...outfalls will be observed during dry weather, at least 72 hours after a rain event of 0.1 inches or greater.” The revised CIMP needs to clearly define dry weather (i.e. days when precipitation is less than 0.1 inch of rain and those days not less than 3 days after a rain event of 0.1 inch or greater).
Section 4.7.3, pg. 49	Attachment E, Part IX.G.5 Pg. E-28	<p>The CIMP states, “[I]f monitoring demonstrates that discharges do not exceed any WQBELs, non-stormwater action levels, or water quality standards for pollutants identified on the 303(d) list, monitoring will cease at an outfall after the first year.”</p> <p>Attachment E, Part IX.G.5 of the LA County MS4 Permit provides that,</p>

CIMP Reference	MRP Element/ Reference (Attachment E)	Summary of Comments and Necessary Revisions
		<p>“Following one year of monitoring, the Permittee may submit a written request to the Executive Officer of the Regional Water Board to reduce or eliminate monitoring of specified pollutants, based on an evaluation of the monitoring data.” The CIMP must follow this process of submitting a written request prior to discontinuing monitoring of any parameters at the outfalls after the first year. It appears that the intention is to make a request to the Regional Water Board regarding discontinuation of monitoring as described in the last paragraph of section 8 on adaptive management; this should be clarified.</p>
TMDL Monitoring Requirements		
<p>Section 1.4.1.1, pg. 15</p>	<p>Part IV.A.6 page E-7</p>	<p>In Section 1.4.1.1, the monitoring program states, “As recognized by the footnote in Attachment K-4 of the Permit, the Peninsula CIMP Group has entered into an Amended Consent Decree with the United States and the State of California, including the Regional Board, pursuant to which the Regional Board has released the Peninsula CIMP Group from responsibility for toxic pollutants in the Dominguez Channel and the Greater LA and LB Harbors.”</p> <p>This statement misinterprets the Regional Water Board’s findings. Footnote 1 to Table K-4 of the LA County MS4 Permit states, “The requirements of this Order to implement the obligations of this TMDL do not apply to a Permittee to the extent that it is determined that the Permittee has been released from that obligation pursuant to the Amended Consent Decree entered in United States v. Montrose Chemical Corp., Case No. 90-3122 AAH (JRx).” As stated in the responses to comments received on the Dominguez Channel and Greater Harbor Waters Toxic Pollutants TMDL, “...primarily one pollutant, DDT, is associated with the Superfund site and also addressed by the TMDL. The TMDL addresses numerous pollutants and utilizes a different process than Superfund. The other pollutants – heavy metals, PAHs, PCBs and other legacy pesticides are not within Superfund’s focus at the Montrose OU2 Site...”</p> <p>Further, the WQBELs applicable to the PV Peninsula group pursuant to the TMDL, which are in Attachment N, Part E of the LA County MS4 Permit, are for ongoing discharges from the MS4, not for the historic contamination of the bed sediments. Therefore, the statement in the CIMP incorrectly concludes that the aforementioned Consent Decree releases the PV Peninsula group from any obligation to implement the WQBELs in Attachment N, Part E.</p>
<p>Section 1.4.1.1, pp. 16-17</p>	<p>Part IV.A.5 page E-7</p>	<p>The PV Peninsula CIMP group requested modifications to the Machado Lake Nutrient TMDL monitoring program. The Regional Water Board approves the following changes:</p>

CIMP Reference	MRP Element/ Reference (Attachment E)	Summary of Comments and Necessary Revisions
		<ol style="list-style-type: none"> 1. Monitoring at the Los Angeles County sites "10-ACAD" and "10-EAST" may be discontinued, since these monitoring sites are upstream of the PV Peninsula Cities' monitoring location "RHE City Hall." 2. Monitoring at the Los Angeles County site "20-SCGB" may be discontinued, since the results from initial monitoring have consistently shown that flow has not been present. 3. The County of Los Angeles may demonstrate compliance with the Machado Lake Nutrient TMDL with the concentration-based monthly average WQBELs for total nitrogen and total phosphorus.
Section 1.4.1.1, pp. 16-17	Part IV.A.5 page E-7	<p>The PV Peninsula CIMP group requested additional modifications to the Machado Lake Nutrient TMDL monitoring program, which the Regional Water Board does not approve of. The CIMP should be revised as follows:</p> <ol style="list-style-type: none"> 1. Monitoring at the PV Peninsula Cities' site "Lariat" shall continue. If there is no flow present at the time of sampling then this shall be noted on the field data sheets. 2. Dry weather monitoring at the PV Peninsula Cities' site "Solano" shall continue. If there is no flow present at the time of sampling then this shall be noted on the field data sheets.
Section 1.4.1.1, pp. 17-18	Part IV.A.5 page E-7	<p>The PV Peninsula CIMP group requested a modification to the Machado Lake Pesticides and PCBs TMDL monitoring program. When insufficient filtered suspended sediment is collected at a monitoring site, the Regional Water Board approves of compositing sediment samples collected from the same location during subsequent storm events within a single storm-year.</p>
Section 1.4.1.1, pp. 18-19	SMB Debris TMDL	<p>The City of Palos Verdes Estates submitted a request to the Regional Water Board to be exempt from the SMB Debris TMDL requirement to submit and implement a Plastic Pellet Monitoring and Reporting Plan (PMRP). The Regional Water Board has reviewed the documentation submitted, which included a spill response plan, and has determined that the City of Palos Verdes Estates does not have industrial facilities or activities related to the manufacturing, handling, or transportation of plastic pellets. Therefore, the City of Palos Verdes Estates is not required to submit and implement a PMRP.</p>
Section 1.4.1.1, pp. 18-19	SMB Debris TMDL	<p>The City of Rancho Palos Verdes submitted a request to the Regional Water Board to be exempt from the SMB Debris TMDL requirement to submit and implement a PMRP. The Regional Water Board has reviewed the documentation submitted, which included a spill response plan, and has determined that the City of Rancho Palos Verdes does not have industrial facilities or activities related to the manufacturing, handling, or transportation of plastic pellets. Therefore, the City of Rancho Palos Verdes is not required to submit</p>

CIMP Reference	MRP Element/ Reference (Attachment E)	Summary of Comments and Necessary Revisions
		and implement a PMRP.
Section 1.4.1.1, pp. 18-19	SMB Debris TMDL	The City of Rolling Hills submitted a request to the Regional Water Board to be exempt from the SMB Debris TMDL requirement to submit and implement a PMRP. The Regional Water Board has reviewed the documentation submitted and has determined that the City of Rolling Hills is a private residential community and there are no industrial facilities or activities related to the manufacturing, handling, or transportation of plastic pellets or transportation corridors within the City. Therefore, the City of Rolling Hills is not required to submit and implement a PMRP or prepare a plastic pellets spill response plan.
Section 1.4.1.1, pp. 18-19	SMB Debris TMDL	The City of Rolling Hills Estates submitted a request to the Regional Water Board to be exempt from the SMB Debris TMDL requirement to submit and implement a PMRP. The Regional Water Board has reviewed the documentation submitted, which included a spill response plan, and has determined that the City of Rolling Hills Estates does not have industrial facilities or activities related to the manufacturing, handling, or transportation of plastic pellets. Therefore, the City of Rolling Hills Estates is not required to submit and implement a PMRP.
Section 1.4.2.1, pg. 19	Attachment E Part XIX.B, pg. E-47	<p>The CIMP states, "The Permit MRP requires the Permittees to develop a Monitoring and Reporting Plan for Regional Board Executive Officer approval that describes the methodologies that will be used to monitor and assess suspended sediment for DDT and PCBs. The monitoring design and assessment framework should be designed to provide credible estimates of the total DDT and PCBs mass loadings to the SMB. Monitoring should be conducted on a coordinated watershed-wide basis using sufficiently sensitive analytical methods for DDT and PCBs." However, the CIMP does not appear to include storm-borne sediment monitoring to quantify loading of DDTs and PCBs, which may be transported through the MS4 to Santa Monica Bay during storm events.</p> <p>If the PV Peninsula CIMP Group intends to rely on the CIMP to meet this requirement, then the CIMP needs to include the sampling locations and methodology that will be used to sample storm-borne sediments and the PCB and DDT loads associated with the storm-borne sediments. The TMDL provides input on stormwater monitoring and states, "As both DDT and PCBs are highly associated with particles, monitoring should focus on sediment particles which may be transported during storms (e.g., as in Curren et al., 2011). We recommend that stormwater permittees filter water from their mass emission stations and analyze particles for DDT and PCBs. This will provide more meaningful estimates of mass loading than traditional</p>

CIMP Reference	MRP Element/ Reference (Attachment E)	Summary of Comments and Necessary Revisions
		<p>water column sampling. We also recommend using sufficiently sensitive methods for DDT and PCBs (e.g. EPA method 1668c for PCB congeners). Monitoring should be conducted on a coordinated watershed-wide basis. The monitoring design and assessment framework should be designed to provide credible estimates of the total mass loadings to the Bay. Any such estimates will require some extrapolation from a few locations to the entire watershed. Stormwater permittees should document the methodology for any such extrapolation.” (USEPA Region IX, 2012, Santa Monica Bay Total Maximum Daily Loads for DDTs and PCBs, page 56). Since there are no mass emission stations to which the PV Peninsula Group discharges, the Group should instead filter water from their outfall monitoring stations Peninsula-SD1 and Peninsula-SD2 and analyze particles for DDT and PCBs.</p>
<p>Section 1.4.2.1, pp. 19</p> <p>Appendix B, pg. B-28</p>	<p>SMB TMDLs for DDTs and PCBs</p>	<p>Monitoring for PCBs in sediment or water should be reported as the summation of a minimum of 40 (and preferably at least 50) congeners and Aroclors as specified in Table E-2 of the Attachment E of the Permit. See Table C8 in the state’s Surface Water Ambient Monitoring Program’s Quality Assurance Program Plan (Page 72 of Appendix C), which can be downloaded at http://www.waterboards.ca.gov/water_issues/programs/swamp/docs/qapp/qaprp082209.pdf for guidance.</p>
<p>Appendix A</p>		<p>The Table on page A-3 needs to include a summary of the monitoring conducted for the Machado Lake Pesticides and PCBs TMDL.</p>
<p>Appendix E</p>		<p>Include the approved City of Rolling Hills Non-Storm Water Screening and Monitoring Program dated November 2014.</p>

Curren J., S. Bush, S. Ha, M.K. Stenstrom, S. Lau, I.H. Suffet. 2011. Identification of subwatershed sources for chlorinated pesticides and polychlorinated biphenyls in the Ballona Creek watershed. Science of the Total Environment 409: 2525–2533

ENCLOSURE 2
COMMENTS ON AQUATIC TOXICITY TESTING
PALOS VERDES PENINSULA CIMP

We note the CIMP is proposing to follow the toxicity testing procedures as described in the MRP.

Suggested Special Study: The 2013 study released by the California Stormwater Quality Association (CASQA) entitled “Review of Pyrethroid, Fipronil and Toxicity Monitoring Data from California Urban Watersheds” reviewed stormwater data from studies conducted during 2005 - 2012 and highlighted the toxicity impacts from use of pesticides not currently required to be monitored for by the MRP. We suggest the group begin monitoring for these chemicals in the receiving water and, in addition, assess toxicity using the 2002 acute toxicity testing protocol (EPA-821-R-02-012) with the amphipod *Hyaella azteca* as the test organism. *H. azteca* is known to be much more sensitive to pyrethroids than is *Ceriodaphnia dubia* while the latter is useful for its sensitivity to OP pesticides. The two species together may also prove to be more useful in detecting toxicity from fipronil. And, should 50% or greater effect be detected in the toxicity test, we suggest a procedure to incorporate pyrethroids into the subsequent TIE be documented (three possible treatments have been identified by researchers, see <http://www.pubfacts.com/detail/20018342/Focused-toxicity-identification-evaluations-to-rapidly-identify-the-cause-of-toxicity-in-environment>). While fipronil does not have a TIE procedure identified currently, chemical testing for the parameter (and degradates) and comparison to U.S. EPA Office of Pesticide Program’s aquatic life benchmarks at http://www.epa.gov/oppefed1/ecorisk_ders/aquatic_life_benchmark.htm will aid in determining the cause(s) of toxicity in order to follow up with outfall testing of the parameter(s) with the ultimate goal of removing the source. This approach will also help minimize inconclusive TIE results which would lead to required toxicity testing in the representative upstream outfall(s).