[Insert date]

Mr. Bryan Cook, City Manager
City of Temple City
Department of Public Works
9701 Las Tunas Dr.
Temple City, CA 91780

REVIEW AND APPROVAL OF THE CITY OF TEMPLE CITY'S USE OF AN ALTERNATIVE COMPLIANCE OPTION FOR THE LOS ANGELES RIVER TRASH TMDL PURSUANT TO PART VI.E.5.b.ii OF THE LOS ANGELES COUNTY MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT (NPDES PERMIT NO. CAS004001; ORDER NO. R4-2012-0175) AS AMENDED BY STATE WATER BOARD ORDER WQ 2015-0075 AND LOS ANGELES WATER BOARD ORDER R4-2012-0175-A01

Dear Mr. Cook:

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board) has reviewed the City of Temple City's (City) Los Angeles River Trash TMDL Alternative Compliance Plan submitted on December 15, 2016 and revised on May 11, 2017. This Plan was submitted pursuant to Part VI.E.5.b.ii of the Los Angeles County MS4 Permit.

For the Los Angeles River Trash TMDL, pursuant to Part VI.E.5.b.ii, the City may employ alternative compliance options to achieve compliance with its final trash effluent limitation in Attachment O Part A.3. These alternative compliance options are available for three of the compliance options in Part VI.E.5.b.i, including the use of full capture systems (FCSs); partial capture devices (PCDs) and the application of institutional controls; or scientifically based alternative compliance approaches.

These alternative compliance options as referenced in the Permit are (1) "FCS Technical Infeasibility," (2) "Mass Balance Equivalency," and (3) "Scientifically Based Alternative." Additionally, pursuant to Part VI.E.5.b.ii, if a Permittee elects to employ an alternative compliance option, it shall submit, if necessary, a revised Watershed Management Program (WMP), a revised Enhanced Watershed Management Program (EWMP), or a separate TMDL implementation plan if the Permittee does not have an approved WMP or EWMP, for Executive Officer approval prior to use of the alternative compliance option.

In its Alternative Compliance Plan, the City describes its approach to compliance with its trash final effluent limitation by employing a combination of full capture systems, partial capture devices and institutional controls, which result in a reduction of trash from the jurisdiction's baseline load between 99% and 100% as calculated using a mass balance approach. The Board notes that this aligns with the "Mass Balance Equivalency" alternative compliance

approach (Part VI.E.5.b.ii.(2)). For the most recent reporting year of 2015-2016, the City reported a **98.84**% compliance through a mass balance approach. However, according to Board staff calculations, the combined compliance approaches for the City demonstrate a **99.87%** reduction of trash from the jurisdiction's baseline load. This was determined through combination of a mass balance approach based on a daily generation rate (DGR) study conducted by the City during the summer of 2016 and compliance demonstration approaches for structural controls as set forth in Parts VI.E.5.b.i.(1)(c) and (2)(a).

Based on review of the City's Alternative Compliance Plan, I approve its use of the "Mass Balance Equivalency" alternative compliance approach to comply with its final trash effluent limitations in Attachment O, Part A.3. I also find that, based on the information provided in the Alternative Compliance Plan, the City has satisfied the requirements set forth in Part VI.E.5.b.ii.(2) to be deemed in compliance with its final trash effluent limitation.

We have also reviewed the approved Upper Los Angeles River EWMP, in which the City is a participating Permittee, and determined that it includes all of the institutional control measures identified by the City in its Alternative Compliance Plan. Therefore, the City does not need to submit a request to the Los Angeles Water Board to revise the Upper Los Angeles River EWMP.

To remain in compliance with its final trash effluent limitation, the City must ensure that all FCSs and PCDs are, and continue to be, properly sized, operated, and maintained, and it must continue to implement at the same level of effort, or greater, all its institutional controls. The City must also reassess its DGR this summer per the requirements of Part VI.E.5.b.i(2)(b).[1]

We commend the City for its efforts to reduce trash discharges to the Los Angeles River and its tributaries, and its success in reducing its trash discharges by over 99%.

If you have any questions, please contact Ms. Angineh Shahnazarian of the Storm Water Permitting Unit by electronic mail at Angineh.Shahnazarian@waterboards.ca.gov or by phone at (213) 576-6635. 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: John Hunter, John L. Hunter and Associates, Inc.

[1] Note that the DGR study must account for all trash generated during the 30-day collection period - - this includes trash that is manually collected, retrieved from the catchbasins, and collected through street sweeping.