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## Los Angeles Regional Water Quality Control Board

July 22, 2024

Via Email Only

Mr. Salvador Mendez  
Public Works and Utilities Director  
City of El Monte  
11333 Valley Boulevard  
El Monte, CA 91731

**APPROVAL OF THE CITY OF EL MONTE'S INTEGRATED MONITORING PROGRAM, PURSUANT TO PART III IN ATTACHMENT E OF THE REGIONAL MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) WASTE DISCHARGE REQUIREMENTS AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR THE LOS ANGELES REGION (NPDES PERMIT NO. CAS004004; ORDER NO. R4-2021-0105)**

Dear Mr. Mendez:

The Regional MS4 Permit (Order No. R4-2021-0105) authorizes discharges from the MS4 operated by 99 municipal Permittees within the coastal watersheds of Los Angeles and Ventura Counties (hereafter, Regional MS4 Permit or Order). The Regional MS4 Permit requires Permittees to implement an Integrated Monitoring Program (IMP) or a Coordinated Integrated Monitoring Program (CIMP) as set forth in the Monitoring and Reporting Program (Attachment E of the Order) hereafter, MRP.

Pursuant to Part III.D.1.a of the MRP, the City of El Monte (City) submitted a revised draft IMP by the March 13, 2023 deadline for approval by the Executive Officer of the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board).

### **Public Review and Comment**

On March 17, 2023, the Los Angeles Water Board provided public notice and a 60-day period to allow for public review and comment on all new or updated monitoring programs submitted by March 13, 2023. The Board received one joint comment letter from Heal the Bay, Natural Resources Defense Council (NRDC), and Los Angeles Waterkeeper. These comments were considered during the Board's review of the IMPs and CIMPs.

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NORMA CAMACHO, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

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## Board's Review

Los Angeles County Permittees were required to update and/or develop a monitoring program pursuant to Part III of the MRP. On July 14, 2023, the Board provided comments to the City requesting revisions to the IMP. On September 22, 2023, the City requested additional time to submit the revised IMP. The City submitted the revised IMP on November 20, 2023. On February 15, 2024, Board staff met with the City to discuss and provide guidance for all the necessary revisions to the IMP and requested the City to submit a revised IMP. The City incorporated additional changes to the IMP and submitted the revised IMP on March 18, 2024. On March 27, 2024, the Board provided additional comments and the City, in response, submitted a revised IMP on April 30, 2024. On May 9, 2024, the Board requested additional minor revision to the IMP. The City submitted the final IMP on May 24, 2024. However, the City requires additional time in order to finalize new cost sharing agreements with several agencies and will submit a copy of all cost sharing agreements upon finalization.

The Los Angeles Water Board has reviewed the City's IMP dated May 24, 2024 and has determined that it is consistent with applicable requirements in the MRP, monitoring provisions in applicable TMDLs, and specifically, with Attachments K through S of the Order. Note that, if applicable, the review of the IMP did not include a review of any Trash Monitoring and Reporting Plans and/or Plastic Pellet Monitoring and Reporting Plans.

## Approval

The Los Angeles Water Board hereby approves the City's IMP, dated May 24, 2024. The City shall submit a copy of all cost sharing agreements to the Board upon finalization. Pursuant to Part III.D.1.c of the MRP, **the City shall implement their approved IMP immediately**. An approval of the City's IMP does not constitute an approval of any unapproved Trash Monitoring and Reporting Plans and/or Plastic Pellet Monitoring and Reporting Plans that were included in the IMP, if applicable.

## Monitoring Program Modifications

Pursuant to Part II.F of the MRP, if the Permittee(s) wish to modify any monitoring requirements in their approved Monitoring Program (e.g., reduce or eliminate monitoring of specified pollutants, reduce monitoring frequencies, change monitoring locations), then the Permittee(s) shall submit a written request to the Executive Officer of the Los Angeles Water Board for approval prior to making any modifications. This provision may be waived if the Los Angeles Water Board determines that the modification is (a) minor and (b) does not otherwise violate any applicable provision of law.

Additionally, pursuant to Part III.D.1.d of the MRP, if there is any change in membership of Permittees participating in an approved CIMP (e.g., Permittee in an IMP joining a CIMP, Permittee(s) dropping out of the CIMP), the Permittee(s) affecting the change shall notify the Los Angeles Water Board promptly. The affected Permittee(s) shall then revise/develop their monitoring program as directed by the Los Angeles Water Board.

If you have any questions about this letter, please contact Angineh Shahnazarian with the Municipal Stormwater Permitting Unit by email at [Angineh.Shahnazarian@waterboards.ca.gov](mailto:Angineh.Shahnazarian@waterboards.ca.gov) or by phone at (213) 576-6635. Alternatively, you may also contact Ivar Ridgeway, Municipal Stormwater Permitting Unit Supervisor by email at [Ivar.Ridgeway@waterboards.ca.gov](mailto:Ivar.Ridgeway@waterboards.ca.gov) or by phone at (213) 620-2150.

Sincerely,

for Susana Arredondo  
Executive Officer

cc: Alma K. Martinez, City of El Monte