



California Regional Water Quality Control Board

Los Angeles Region



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Arnold Schwarzenegger
Governor

July 11, 2008

Mr. Enrique C. Zaldivar
Director, Bureau of Sanitation
City of Los Angeles
1149 South Broadway Street, 9th Floor
Los Angeles, CA 90015

REVISION OF OCEAN MONITORING AND REPORTING PROGRAMS FOR HYPERION TREATMENT PLANT (CA010991, M1492) AND TERMINAL ISLAND WATER RECLAMATION PLANT (CA0053856, M2171)

Dear Mr. Zaldivar:

We have reviewed your letter of June 26, 2008, requesting revisions to the NPDES-mandated monitoring for the Hyperion and Terminal Island Treatment Plants to allow the City of Los Angeles to provide support for Bight'08 monitoring activities. Your letter outlines proposed resource exchanges of toxicity testing, microbiological monitoring, offshore water quality monitoring, local benthic trends monitoring, local demersal fish and invertebrate monitoring, local bioaccumulation monitoring, and local seafood monitoring. We have the following comments.

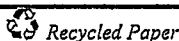
Toxicity Testing

You propose to exchange 4 months of effluent toxicity analyses (acute and chronic) for Hyperion and Terminal Island, as well as 2 quarters of receiving water toxicity analyses (acute and chronic) to allow the City to provide analyses of 37 sediment samples with the 10-day amphipod test to the Bight'08 study. This proposal is acceptable provided that effluent analyses continue to be performed every other month at a minimum at each plant (rather than simply eliminating effluent toxicity testing for four consecutive months).

Microbiological Monitoring

The Bight'08 monitoring plan design for microbiological sampling has not yet been finalized, so no resource exchange is proposed at this time. However, your letter indicates that you potentially are considering the exchange of a portion of the NPDES-mandated shoreline and receiving water microbiological monitoring in the vicinity of Cabrillo Beach. We may not be able to allow such

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an exchange if this monitoring effort is required to support TMDL-related activities. We suggest that you discuss this issue with Regional Board TMDL staff prior to developing a final proposal for this type of resource exchange.

Offshore Water Quality Monitoring

You propose to exchange CTD monitoring and discrete water sample analyses (ammonia nitrogen, total and fecal coliforms, and enterococcus) during the third quarter of 2008 for Hyperion and Terminal Island to provide similar monitoring and analyses at transects established for the Bight'08 study. This proposal is acceptable.

Local Benthic Trends Monitoring

You propose to exchange the effort required to collect and process benthic infaunal samples at 37 of 44 benthic stations for Hyperion and 9 of 11 benthic stations for Terminal Island, as well as the effort to conduct TOC and grain size analyses at 37 benthic stations for Hyperion, to allow collection and processing of 46 benthic infaunal, TOC and grain size samples for the Bight'08 study. This proposal is acceptable.

You also propose to exchange chemical analyses of sediments at 4 benthic stations for Hyperion (eight metals, mercury, total DDT and DDT derivatives, total PCB and PCB derivatives, and compounds on the local 303(d) list) and 11 benthic stations for Terminal Island (eight metals, mercury, cyanide, chlorinated and non-chlorinated phenolic compounds, toxaphene, pesticides and PCBs, total PAH and PAH derivatives, detected priority pollutants, and 303(d) listed compounds), as well as pore water dissolved sulfide, TOC and grain size for the 11 benthic stations for Terminal Island, to allow chemical analyses of 18 sediment samples for the Bight'08 study (twelve pollutant metals, mercury, aluminum, iron, twenty-five polycyclic aromatic hydrocarbons, forty-two PCB congeners, twelve organochlorine pesticides and 4,4'-DDMU). This proposal also is acceptable.

Local Demersal Fish and Invertebrate Monitoring

You propose to exchange trawling effort at 8 of 10 Hyperion stations and 4 of 6 Terminal Island stations to allow for trawling and community analysis of demersal fish and invertebrates at 19 stations for the Bight'08 study. This proposal is acceptable.

Local Bioaccumulation Trends Monitoring

The Bight'08 monitoring plan design has not yet been finalized and sampling is not expected to occur until 2009, so no resource exchange is proposed at this time. However, your letter indicates that you potentially are considering the exchange of a portion of your NPDES-

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mandated bioaccumulation monitoring for Hyperion and Terminal Island. This seems reasonable and we will consider your proposal once the sampling design has been developed.

Local Seafood Monitoring

As mentioned above, the Bight'08 monitoring plan design has not been finalized and sampling is not expected to occur until 2009, so no resource exchange is proposed at this time. However, your letter indicates that you potentially are considering the exchange of a portion of the NPDES-mandated rigfishing for Hyperion. This seems reasonable and we will consider your proposal once the sampling design has been developed.

We appreciate your continuing participation in the Bight'08 comprehensive monitoring program for the Southern California Bight. If you have any questions about the monitoring program requirements, please telephone Michael Lyons at (2123) 576-6718.

Sincerely,

fw David A. Bacharowski, AEO
Tracy J. Egoscue
Executive Officer

Cc: Terry Fleming, United States Environmental Protection Agency
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