



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Cal/EPA Secretary

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Arnold Schwarzenegger  
Governor

August 7, 2008

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

### ONE-TIME MONITORING OFFSETS FOR LOS ANGELES-GLENDALE WATER RECLAMATION PLANT (CA0053953, M5675) AND DONALD C. TILLMAN WATER RECLAMATION PLANT (CA0056227, M5695) TO IMPLEMENT LOS ANGELES RIVER WATERSHED-WIDE MONITORING PROGRAM

Dear Mr. Zaldivar:

We have reviewed your letter of July 25, 2008, requesting revisions to the NPDES-mandated monitoring for the Los Angeles-Glendale and Tillman Plants to allow the City of Los Angeles to provide resources to begin implementation this year of the comprehensive monitoring program designed by stakeholders for the Los Angeles River Watershed. Regional Board staff (Michael Lyons) participated with the other stakeholders in developing the design of the watershed-wide monitoring program and already indicated support for these changes to allow sampling for certain elements of the new program to begin in June 2008.

The City of Los Angeles proposes to discontinue sampling from August 2008 through the end of the year at five receiving water stations in the Los Angeles River. Analysis of past monitoring data has demonstrated that these stations appear to be redundant with other existing monitoring stations and could be discontinued in the future. The stakeholders currently are working on a long-term plan to implement the comprehensive monitoring program, which probably will include a proposal to reallocate the resources required to monitor these five stations. Once that proposal is submitted to the Regional Board for consideration, staff will evaluate whether these stations can be discontinued permanently (considering the needs of compliance monitoring, as well as other programs such as TMDL monitoring). However, staff does not object to eliminating monitoring temporarily at stations F, H, WD and WC as required under the Tillman Monitoring and Reporting Program and at station R-5 as required under the Los Angeles-Glendale Monitoring and Reporting Program (including suspension of all weekly, monthly, quarterly and semi-annual sampling, including acute and chronic toxicity testing, for the remainder of the calendar year).

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The estimated cost savings to the City of Los Angeles would be approximately \$119,430. The City performed water chemistry analyses and toxicity analyses for 10 random sites in June and plans to perform similar analyses for confluence sites in the fall in support of the watershed-wide monitoring program, at an estimated cost of approximately \$71,236. In addition, the City will contribute \$46,264 for development of other components of the implementation strategy for the watershed-wide monitoring program (on top of \$37,736 already provided to develop the program). Given this level of effort, the proposed offset appears to be well justified.

The City of Los Angeles also has requested approval to conduct bioassessment monitoring in the spring/early summer, rather than during the fall period as specified in the Tillman and Los Angeles-Glendale monitoring and reporting programs. Regional Board staff agrees with this change, since it is consistent with the strategy employed for other bioassessment monitoring programs throughout the region and the state. The City also requests approval to conduct the bioassessment monitoring according to the State's Surface Water Ambient Monitoring Program's 2007 sampling protocols, which have been modified slightly from those specified by the monitoring and reporting programs. Staff also agrees with this change and would recommend that the City continues to modify sampling methods in the future to remain comparable with SWAMP protocols.

We appreciate your participation in development and implementation of a comprehensive monitoring program for the Los Angeles River watershed. We look forward to developing a long-term implementation and funding strategy for this program and will consider additional modifications to the monitoring and reporting programs for the Tillman and Los Angeles-Glendale plants as necessary in the future. If you have any questions about the monitoring program requirements, please telephone Michael Lyons at (2123) 576-6718.

Sincerely,



Chief Deputy E.O.

Tracy J. Egoscue  
Executive Officer

*California Environmental Protection Agency*



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