STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
320 W. 4th Street, Suite 200, Los Angeles

FACT SHEET
WASTE DISCHARGE REQUIREMENTS
for
CITY OF LOS ANGELES DEPARTMENT OF WATER AND POWER
(Harbor Generating Station Fuel Storage, North Skim Pond Tank Farm)

NPDES Permit No.: CA0056383
Public Notice No.: 02-065

FACILITY ADDRESS
Harbor Generating Station Fuel Storage North
Skim Pond Tank Farm
100 North Fries Avenue
Wilmington, CA 90744

FACILITY MAILING ADDRESS
City of Los Angeles Department of
Water and Power
P.O. Box 51111, Room 1121
Los Angeles, CA 90051
Contact: Katherine Rubin
Telephone: (213) 367-0436

I. Public Participation

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is considering the issuance of waste discharge requirements (WDRs) that will serve as a National Pollutant Discharge Elimination System (NPDES) permit for the above-referenced facility. As an initial step in the WDR process, the Regional Board staff has developed tentative WDRs. The Regional Board encourages public participation in the WDR adoption process.

A. Written Comments

The staff determinations are tentative. Interested persons are invited to submit written comments concerning these tentative WDRs. Comments should be submitted either in person or by mail to:

Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

To be fully responded to by staff and considered by the Regional Board, written comments should be received at the Regional Board offices by 5:00 p.m. on December 27, 2002.

B. Public Hearing

The Regional Board will hold a public hearing on the tentative WDRs during its regular Board meeting on the following date and time and at the following location:

Date: January 30, 2003
Time: 9:00 a.m.
Location: Metropolitan Water District of Southern California, Board Room,
700 North Alameda Street,
Los Angeles, California

Interested persons are invited to attend. At the public hearing, the Regional Board will hear testimony, if any, pertinent to the discharge, WDRs, and permit. Oral testimony will be heard; however, for accuracy of the record, important testimony should be in writing.

C. Waste Discharge Requirements Appeals

Any aggrieved person may petition the State Water Resources Control Board to review the decision of the Regional Board regarding the final WDRs. The petition must be submitted within 30 days of the Regional Board's action to the following address:

State Water Resources Control Board, Office of Chief Counsel
ATTN: Elizabeth Miller Jennings, Senior Staff Counsel
1001 I Street, 22nd Floor
Sacramento, CA 95814

D. Information and Copying

The Report of Waste Discharge (ROWD), related documents, tentative effluent limitations and special conditions, comments received, and other information are on file and may be inspected at 320 West 4th Street, Suite 200, Los Angeles, California 90013, at any time between 8:30 a.m. and 4:45 p.m., Monday through Friday. Copying of documents may be arranged through the Los Angeles Regional Board by calling (213) 576-6600.

E. Register of Interested Persons

Any person interested in being placed on the mailing list for information regarding the WDRs and NPDES permit should contact the Regional Board, reference this facility, and provide a name, address, and phone number.

II. Introduction

The City of Los Angeles, Department of Water and Power (hereinafter LADWP or Discharger) discharges wastes from its Harbor Generating Station Fuel Storage, North Skim Pond Tank Farm to Los Angeles Inner Harbor, a water of the United States. Wastes discharged from

LADWP are regulated under WDRs contained in Board Order No. 92-085 adopted by this Regional Board on December 7, 1992. Order 92-085 serves as a National Pollutant Discharge Elimination System (NPDES) permit (NPDES Permit No. CA0056383). Order No. 92-085 expired on November 10, 1997.

LADWP has filed a report of waste discharge and applied for renewal of its WDRs and NPDES permit. A site visit was conducted on November 19, 2002, to observe operations and collect additional data to develop permit limits and conditions.

III. Description of Facility and Waste Discharge

The City of Los Angeles, Department of Water and Power operates the Harbor Generating Station Fuel Storage North Skim Pond Tank Farm (Facility) located in 100 North Fries Avenue in Wilmington, California. The Facility consists of one fuel storage tank with a capacity of 378,000 gallons in a tank farm area surrounded by a 10-foot earthen dike. The storage tank farm area comprises approximately 100 square feet. The storage tank is used for backup storage of No. 2 diesel fuel oil for the generating station. Storm water is collected in the tank farm area that may pick up pollutants from that area and from the loading dock area. Storm water is collected in a containment area, directed to a four-stage oil skim pond, and then directed to a storm drain on Fries Avenue that discharges to the Los Angeles Inner Harbor. The oil skim pond is designed to remove petroleum compounds and grease picked up by the storm water runoff. Skimmed oil is removed from the oil skim pond and is hauled off-site for legal disposal.

LADWP maintains a fire protection system for the storage tank farm area. The fire protection system uses a high-protein, nontoxic, biodegradable fire-fighting foam that is injected directly into the storage tank when the system is activated. LADWP also performs annual fire protection system testing in the storage tank farm area. The testing of the fire protection system does not result in any discharge of foam fire retardant. The testing procedure involves testing electrical connections and mechanical features; therefore, no wastewater is generated during the procedure.

LADWP also maintains a fire protection system at the loading dock that consists of 28 overhead sprinklers. The sprinklers discharge municipal water with no additives when the fire protection system is activated. The loading dock sprinkler system test consists of running the sprinklers at a rate of 100 gallons per minute (gpm) for 5 minutes. Runoff is generated when the sprinklers are tested.

Storm water and loading dock fire protection system test water are directed to a four-stage oil skimming pond before they are discharged to the storm drain on Fries Avenue.

LADWP intermittently discharges up to 142,000 gallons per day (gpd) of storm water runoff from the storage tank farm area commingled within the skim pond with 500 gpd of loading dock fire protection test water runoff then to a storm drain located on Fries Avenue through Discharge Serial No. 001 (latitude 33°46'11" North, longitude 118°15'48" West). The

wastewater then flows to Los Angeles Inner Harbor, a water of the United States.

Because of the limited capacity of the local publicly owned treatment works, the discharge of these wastes into the sanitary sewer is restricted.

The Regional Board and the United States Environmental Protection Agency (USEPA) have classified the LADWP Harbor Fuel Storage North Skim Pond facility as a minor discharge.

Effluent limits contained in the existing permit for LADWP and representative monitoring data from the previous permit term are presented in the following table:

Constituent (units)	Effluent Limit (Daily Maximum)	Monitoring Data (1996 – 2001)
		Maximum
Phenols (mg/L)	1.0	<0.5
Oil and grease (mg/L)	15	8.6
Acute Toxicity (% survival)	[1]	100

[1] Average survival in effluent for any three consecutive 96-hour static or continuous flow bioassay tests shall be at least 90%, with no single test producing less than 70% survival.

A facility inspection report dated October 21, 1999, shows that the Discharger is in compliance with the requirements in the existing permit. Further, during the site visit on November 19, 2002, the facility appeared to be in good working condition.

IV. Applicable Plans, Policies, and Regulations

The requirements contained in the proposed Order are based on the requirements and authorities contained in the following:

1. The Federal Clean Water Act (CWA). The CWA requires that any point source discharges of pollutants to a water of the United States must be done in conformance with an NPDES permit. NPDES permits establish effluent limitations that incorporate various requirements of the CWA designed to protect water quality.

2. Title 40, Code of Regulations (40 CFR) – Protection of Environment, Chapter I, Environmental Protection Agency, Subchapter D, Water Programs, Parts 122-125 and Subchapter N, Effluent Guidelines. These CWA regulations provide effluent limits for certain dischargers and establish procedures for NPDES permitting, including how to establish effluent limits for certain pollutants discharged by LADWP.

3. On June 13, 1994, the Regional Board adopted a revised *Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan). The Basin Plan contains water quality objectives and beneficial uses for Los Angeles Inner Harbor.

Existing: industrial service supply, navigation, non-contact water recreation, preservation of rare and endangered species, commercial and sport fishing, marine habitat.

Potential: water contact recreation and shellfish harvesting.

4. The State Water Resources Control Board (State Board) adopted a *Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Water and Enclosed Bays and Estuaries of California* (Thermal Plan) on May 18, 1972, and amended this plan on September 18, 1975. This plan contains temperature objectives for Los Angeles Inner Harbor.

5. On May 18, 2000, the U.S. Environmental Protection Agency (USEPA) promulgated numeric criteria for priority pollutants for the State of California [known as the *California Toxics Rule* (CTR) and codified as 40 CFR § 131.38]. In the CTR, USEPA promulgated criteria that protect the general population at an incremental cancer risk level of one in a million (10^{-6}), for all priority toxic pollutants regulated as carcinogens. The CTR also provides a schedule of compliance not to exceed 5 years from the date of permit renewal for an existing discharger if the Discharger demonstrates that it is infeasible to promptly comply with the CTR criteria.

6. 40 CFR section 122.44(d)(vi)(A) requires the establishment of numeric effluent limitations to attain and maintain applicable narrative water quality criteria to protect the designated beneficial uses. Where numeric water quality objectives have not been established in the Basin Plan, 40 CFR section 122.44(d) specifies that water quality-based effluent limits (WQBELs) may be set based on USEPA criteria and supplemented, where necessary, by other relevant information to attain and maintain narrative water quality criteria to fully protect designated beneficial uses.

7. State and Federal antibacksliding and antidegradation policies require that Regional Board actions to protect the water quality of a water body and to ensure that the waterbody will not be further degraded. The antibacksliding provisions are specified in section 402(o) of the CWA and in the Title 40 of the Code of Federal Regulations (40 CFR), section 122.44(l). Those provisions require a reissued permit to be as stringent as the previous permit with some exceptions where effluent limitations may be relaxed.

8. Effluent limitations are based on the Basin Plan, existing permit limits, and established in accordance with sections 301, 304, 306, and 307 of the federal CWA, and amendments thereto. These requirements, as they are met, will maintain and protect the beneficial uses of the Los Angeles Inner Harbor.

9. The existing waste discharge requirements contained in Board Order No. 92-085 were adopted by the Regional Board on December 7, 1992. In some cases, permit conditions (effluent limitations and other special conditions) established in the existing waste discharge requirements have been carried over to this permit.

V. Regulatory Basis for Effluent Limitations

The CWA requires point source discharges to control the amount of conventional, nonconventional, and toxic pollutants that are discharged into the waters of the United States. The control of the discharge of pollutants is established through NPDES permits that contain effluent limitations and standards. The CWA establishes two principal bases for effluent limitations. First, dischargers are required to meet technology-based effluent limitations that reflect the best controls available considering costs and economic impact. Second, they are required to meet water quality-based effluent limitations (WQBELs) that are developed to protect applicable designated uses of the receiving water.

The CWA requires that technology-based effluent limitations be established based on several levels of controls:

- Best practicable treatment control technology (BPT) is based on the average of the best performance by plants within an industrial category or subcategory. BPT standards apply to toxic, conventional, and nonconventional pollutants.

- Best available technology economically achievable (BAT) represents the best existing performance of treatment technologies that are economically achievable within an industrial point source category. BAT standards apply to toxic and nonconventional pollutants.

- Best conventional pollutant control technology (BCT) is a standard for the control from existing industrial point sources of conventional pollutants including BOD, TSS, fecal coliform, pH, and oil and grease. The BCT standard is established after considering the "cost reasonableness" of the relationship between the cost of attaining a reduction in effluent discharge and the benefits that would result, and also the cost effectiveness of additional industrial treatment beyond BPT.

- New source performance standards (NSPS) that represent the best available demonstrated control technology standards. The intent of NSPS guidelines is to set limitations that represent state-of-the-art treatment technology for new sources.

The CWA requires EPA to develop effluent limitations, guidelines and standards (ELGs) representing application of BPT, BCT, BAT, and NSPS. Section 402(a)(1) of the CWA and 40 CFR 125.3 of the NPDES regulations authorize the use of best professional judgment (BPJ) to derive technology-based effluent limitations on a case-by-case basis where ELGs are not available for certain industrial categories and/or pollutants of concern.

If a reasonable potential exists for pollutants in a discharge to exceed water quality standards, WQBELs are also required under 40 CFR 122.44(d)(1)(i). WQBELs are established after determining that technology-based limitations are not stringent enough to ensure that state water quality standards are met for the receiving water. WQBELs are based on the designated uses of the receiving water, water quality criteria necessary to support the

designated uses, and the state's antidegradation policy. For discharges composed entirely of storm water, such as the potential discharges to inland surface waters, enclosed bays, and estuaries, the USEPA's *Technical Support Document for Water Quality-Based Toxics Control (TSD) of 1991* (USEPA/505/2-90-001) establishes procedures for determining reasonable potential and establishing WQBELs for priority pollutant criteria promulgated by USEPA through the CTR and NTR, as well as the Basin Plan. With respect to a reasonable potential analysis, the TSD identifies an appropriate step-wise approach that can be used to determine whether a discharge has a reasonable potential. The approach used in the TSD is equally valid for determining the reasonable potential for discharges not comprised entirely of storm water discharges.

There are several other specific factors affecting the development of limitations and requirements in the proposed Order. These are discussed as follows:

1. **Pollutants of Concern**

   The CWA requires that any pollutant that may be discharged by a point source in quantities of concern must be regulated through an NPDES permit. Further, the NPDES regulations require regulation of any pollutant that (1) causes; (2) has the reasonable potential to cause; or (3) contributes to the exceedance of a receiving water quality criteria or objective.
   Effluent limitations in the current permit were established for phenol because it is a typical component of the petroleum products stored on-site and may be picked up by storm water runoff. Storm water runoff may also pick up oil and grease from the tank farm area, and thus oil and grease is likely to impact the discharge. Therefore, effluent limitations for oil and grease and phenol are established in this permit. Storm water runoff may affect the pH and temperature of the discharge; therefore, effluent limitations for pH and temperature are established in this permit. Total suspended solids, BOD, turbidity, sulfide, dissolved oxygen, total organic carbon, and conductivity are parameters used to characterize wastewater, and thus these parameters are considered pollutants of concern.

2. **Technology-Based Effluent Limits**

   The existing permit for the LADWP facility required the Discharger to develop and implement a *Storm Water Pollution Prevention Plan* (SWPPP). The SWPPP outlines site-specific management processes for minimizing storm water runoff contamination and for preventing contaminated storm water runoff from being discharged directly into surface waters. Because LADWP discharges storm water, the proposed permit requires LADWP to update and continue to implement its SWPPP. The Discharger is also required to update the Spill Contingency Plan. However, LADWP has developed and implemented a Spill Prevention Control and Countermeasure Plan (SPCC) plan in accordance with 40 CFR Part 112. Thus, the Spill Contingency Plan maybe substituted with the SPCC plan.

Because of the lack of national ELGs for tank farm facilities and the absence of data available to apply BPJ, and pursuant to 40 CFR 122.44(k), the Regional Board will require the Discharger to develop and implement a *Best Management Practices Plan* (BMPP). The purpose of the BMPP will be to establish site-specific procedures to prevent the discharge of pollutants in non-storm water discharges (e.g., loading dock fire protection system test water). The combination of the SWPPP and BMPP and existing permit limitations based on past performance and reflecting BPJ will serve as the equivalent of technology-based effluent limitations, in the absence of established ELGs, to carry out the purposes and intent of the CWA.

3. **Water Quality-Based Effluent Limits**

As specified in 40 CFR § 122.44(d)(1)(i), permits are required to include WQBELs for toxic pollutants (including toxicity) that are or may be discharged at levels which cause, have reasonable potential to cause, or contribute to an excursion above any state water quality standard. The process for determining reasonable potential and calculating WQBELs when necessary is intended to protect the designated uses for the receiving water as specified in the Basin Plan, and to achieve applicable water quality objectives and criteria (that are contained in other state plans and policies, or USEPA water quality criteria contained in the CTR and NTR). The procedures for determining reasonable potential, and if necessary for calculating WQBELs, are contained in the TSD for storm water discharges. Further, in the best professional judgment of the Regional Board staff, the TSD identifies an appropriate, rational step-wise approach that can be used to determine whether storm water discharges have a reasonable potential.

The CTR contains both saltwater and freshwater criteria. According to 40 CFR § 131.38(c)(3), freshwater criteria apply at salinities of 1 part per thousand (ppt) and below at locations where this occurs 95 percent or more of the time; saltwater criteria apply at salinities of 10 ppt and above at locations where this occurs 95 percent or more of the time; and at salinities between 1 and 10 ppt, the more stringent of the two apply. The CTR criteria for saltwater or human health for consumption of organisms, whichever is more stringent, are used to prescribe the effluent limitations in this Order to protect the beneficial uses of Los Angeles Inner Harbor.

(a) Reasonable Potential Analysis

Sufficient effluent and ambient data are needed to conduct a complete RPA. If data are not sufficient, the Discharger will be required to gather the appropriate data for the Regional Board to conduct the RPA. Upon review of the data, and if the Regional Board determines that WQBELs are needed to protect the beneficial uses, the permit will be reopened for appropriate modification.

There is insufficient monitoring data available to perform RPA to the priority pollutants. The TSD requires the dischargers to submit sufficient data to conduct the

determination of priority pollutants requiring WQBELs and to calculate the effluent limitations. This permit includes an interim monitoring requirements to obtain the necessary data.

(b) Calculating WQBELs

If a reasonable potential exists to exceed applicable water quality criteria or objectives, a WQBEL must be established in accordance with one of three procedures contained in Section 5.4 of the TSD. These procedures include:

1) If applicable and available, use of the wasteload allocation (WLA) established as part of a total maximum daily load (TMDL).

2) Use of a steady-state model to derive maximum daily effluent limitations (MDELs) and average monthly effluent limitations (AMELs).

3) Where sufficient effluent and receiving water data exist, use of a dynamic model that has been approved by the Regional Board.

(c) Impaired Water Bodies in 303 (d) List

Section 303(d) of the CWA requires states to identify specific water bodies where water quality standards are not expected to be met after implementation of technology-based effluent limitations on point sources. For all 303(d)-listed water bodies and pollutants, the Regional Board plans to develop and adopt TMDLs that will specify WLAs for point sources and load allocations (LAs) for non-point sources, as appropriate.

The USEPA has approved the State's 303(d) list of impaired water bodies. Certain receiving waters in the Los Angeles and Ventura County watersheds do not fully support beneficial uses and therefore have been classified as impaired on the 1998 303(d) list and have been scheduled for TMDL development.

The Los Angeles/Long Beach Harbors are in the southern portion of the Los Angeles Basin in the greater San Pedro Bay. Together with Dominguez Channel, these harbors receive discharges from highly industrialized areas. The 1998 State Board's California 303(d) List classifies several portions of the Los Angeles Inner Harbor as impaired. These water bodies include: Consolidated Slip, Southwest Slip, a portion of Main Channel, Fish Harbor, Cabrillo Pier, and breakwater. The pollutants of concern, detected in the water column, in the sediment, and in fish tissue, include: copper, lead, ammonia, coliform bacteria, chromium, zinc, DDT, PAHs, sediment toxicity, aldrin, benthic community effects, Chem A [refers to the sum of aldrin, dieldrin, chlordane, endrin, heptachlor, heptachlor epoxide, HCH (including lindane), endosulfan, and toxaphene], PCBs, and tributyltin.

(d) Whole Effluent Toxicity

Whole Effluent Toxicity (WET) protects the receiving water quality from the aggregate toxic effect of a mixture of pollutants in the effluent. WET tests measure the degree of response of exposed aquatic test organisms to an effluent. The WET approach allows for protection of the narrative "no toxics in toxic amounts" criterion while implementing numeric criteria for toxicity. There are two types of WET tests: acute and chronic. An acute toxicity test is conducted over a short time period and measures mortality. A chronic toxicity test is conducted over a longer period of time and measures mortality, reproduction, and growth.

The Basin Plan specifies a narrative objective for toxicity, requiring that all waters be maintained free of toxic substances in concentrations that are lethal to or produce other detrimental response in aquatic organisms. Detrimental response includes but is not limited to decreased growth rate, decreased reproductive success of resident or indicator species, and/or significant alterations in population, community ecology, or receiving water biota. The existing permit contains acute toxicity limitations and monitoring requirements.

In accordance with the Basin Plan, acute toxicity limitations dictate that the average survival in undiluted effluent for any three consecutive 96-hour static or continuous flow bioassay tests shall be at least 90%, with no single test having less than 70% survival. Consistent with Basin Plan requirements, this Order includes acute toxicity limitations.

The discharges at the LADWP facility occur only after a significant storm event or after a loading dock fire protection system test; they are not continuous. Therefore, the discharge is not expected to contribute to long-term toxic effects. Intermittent discharges are likely to have short-term toxic effects; therefore, at this facility LADWP will be required to continue to conduct acute toxicity testing in accordance with the existing permit requirements.

4. **Specific Rationale for Each Numerical Effluent Limitation**

Section 402(o) of the Clean Water Act and 40 CFR 122.44(l) require that effluent limitations standards or conditions in reissued permits be at least as stringent as those in the existing permit. The Regional Board has determined that reasonable potential exists for all pollutants that are regulated under the current permit; therefore, effluent limitations have been established for these pollutants. Furthermore, the requirements in the proposed Order for oil and grease and phenol (shown in the table below) are based on limits specified in LADWP's existing permit. The effluent limitations for pH and temperature are based on the Basin Plan.

Since there is insufficient monitoring data available to perform RPA and calculating WQBELs for the priority pollutants, no effluent limitations are prescribed in this Order until

data are obtained to perform the RPA.

The following table presents the effluent limitations and specific rationales for pollutants that are expected to be present in the discharge:

Constituents	Units	Discharge Limitations		Rationale
		Monthly Average	Daily Maximum	
Total Suspended Solids	Mg/L	50	75	BPJ
Turbidity	NTU	50	75	BPJ
Settleable solids	Ml/L	0.1	0.3	BPJ
BOD_5 20°C	Mg/L	20	30	BPJ
Oil and Grease	Mg/L	10	15	E
Sulfides	Mg/L	---	1.0	BPJ
Phenols	Mg/L	---	1.0	E

BPJ = Best professional judgement is the method used by permit writers to develop technology-based NPDES permit conditions on a case-by-case basis using all reasonably available and relevant data. BPJ limits are established in cases where effluent limitation guidelines are not available for a particular pollutant of concern. Authorization for BPJ limits is found under section 401(a)(1) of the Clean Water Act and under 40 CFR 125.3.

E = Existing permit limit

4. **Monitoring Requirements**

According to Section 3.2 of the TSD, if data are unavailable or insufficient to conduct the RPA, the Regional Board should establish interim requirements that require additional monitoring for the pollutants in place of a WQBEL. Upon completion of the required monitoring, the Regional Board should use the gathered data to conduct the RPA and determine whether a WQBEL is required. As prescribed in the Monitoring and Reporting Program, the Regional Board shall require periodic monitoring for pollutants for which criteria or objectives apply and for which no effluent limitations have been established.

The Discharger submitted the NPDES permit renewal application with requests that the monitoring requirements for trace metals, benzene, toluene, conductivity, and dissolved oxygen be removed from the permit requirements. The Discharger stated that metals have been non-detect values or at trace levels in the discharge. However, monitoring data show that the detection limits were above the minimum level and metals are pollutants of concern for this type of discharge and nature of operation, therefore, this permit requires monitoring metals. The Discharger also requested that monitoring for benzene and toluene be removed from the reissued permit because they will not be

present in the discharge. Monitoring for benzene and toluene is still required in this permit because of the nature of operation, and they are considered pollutants of concern. The Discharger stated that conductivity has not been significant and is at levels typical to ground water and drinking water measurements. Conductivity provides an indirect measure of the presence of dissolved solids in the storm water discharges. Effluent data show that conductivity values range from 1326 µmhos/cm to 5800 µmhos/cm. After a review of the effluent monitoring data for conductivity, the Board has decided to maintain existing monitoring requirements. In addition, the Discharger requested that the monitoring requirements for dissolved oxygen be removed from the reissued permit. The Basin Plan contains water quality objectives for dissolved oxygen; therefore, monitoring is still required in the proposed Order.

(a) Effluent Monitoring

To assess the impact of the discharge to the beneficial uses of the receiving waters, the Discharger is required to monitor the conventional and priority pollutants. Monitoring of these pollutants will characterize the wastes discharged.

(b) Effluent Monitoring for Reasonable Potential Determination

In accordance with the TSD, the Discharger should submit data sufficient for: (1) determining whether WQBELs for priority pollutants are required, and (2) calculating effluent limitations, if required. Therefore, the Discharger will be required to conduct an interim monitoring program for all CTR priority pollutants until December 2004, or until ordered otherwise by the Regional Board. As described in the Monitoring and Reporting Program, monitoring reports must be submitted quarterly.

This interim monitoring shall occur at the following locations:

- Effluent discharge point (Discharge Serial No. 001).
- Receiving water. The monitoring stations shall be at 50 feet upstream from the discharge point of the storm drain to the Los Angeles Inner Harbor.

***(c)* Storm Water Monitoring**

The Discharger is required to measure and record the rainfall each day of the month. The Discharger is also required to conduct visual observations of all storm water discharges at all storm water discharge locations to observe the presence of floating and suspended materials, oil and grease, discoloration, turbidity, and odor. Furthermore, the Discharger shall implement the Storm Water Pollution Prevention Plan (SWPPP) Requirements as enumerated in Attachment M of the WDR Order No. R4-2003-0028.

***(d)* Receiving Water Monitoring**

LADWP is required to perform general observations of the receiving water when discharges occur and report the observations in the quarterly monitoring report. The Regional Board will use data from these observations in assessing potential impacts of future discharges. If no discharge occurred during the observation period, this shall be reported. Observations shall be descriptive where applicable, such that colors, approximate amounts, or types of materials are apparent. The following observations are required:

- Tidal stage, time, and date of monitoring
- Weather conditions
- Color of water
- Appearance of oil films or grease, or floatable materials
- Extent of visible turbidity or color patches
- Direction of tidal flow
- Description of odor, if any, of the receiving water
- Presence and activity of California least tern and California brown pelican.