

**WORKPLAN FOR CITY OF LOS ANGELES BUREAU OF SANITATION  
WATERSHED PROTECTION DIVISION  
APPLICATION FOR USEPA 104b(3) GRANT**

The City of Los Angeles Bureau of Sanitation [City] is submitting this Workplan to EPA Region 9 to fulfill the award requirements of a Clean Water Act Section 104b(3) grant for the “ Los Angeles River Watershed Stakeholder-Led Total Maximum Daily Load [TMDL] Report Development [Project]. The contents of the Workplan include:

1. Introduction
2. Description of Project Tasks
3. Project Schedule and Deliverables
4. Project Cost Estimate

Any questions regarding this Workplan should be directed to Sheila Brice at the City [213 473-8564, [szbrice@san.lacity.org](mailto:szbrice@san.lacity.org)].

## **1. INTRODUCTION**

The Bureau of Sanitation, City of Los Angeles is submitting this Workplan (EPA grant Workplan) for a \$150,000 Region 9 grant to support a project for stakeholder-led TMDL development for the Los Angeles River including the estuary [also called Queensway Bay]. This EPA grant Workplan describes the proposed tasks to be funded by the grant and addresses the three impairing constituents in the Los Angeles River and the two impairing constituents in the estuary. The proposed tasks and schedules described in this Workplan are based on currently available information and are open for revisions based on stakeholder agreements, and recommendations from USEPA and the Regional Board.

As background, the stakeholder-led TMDL project will be led by the City in collaboration with the RWQCB, the USEPA [Region 9], and interested Los Angeles River watershed stakeholders. The project covers both the Los Angeles River and its estuary at Queensway Bay; it is being referred to in this document as a TMDL Project for the Los Angeles River. The TMDL project's objective is to support development of TMDLs Technical Supporting Documents for five impairing water quality constituents, which are currently not covered by past or current TMDL projects: bacteria, organics, and oils in the River, as well as metals and historic pesticides/PCBs in the estuary. TMDLs establish the maximum amount of a constituent that a water body can receive without violating water quality standards.

In summary, the TMDL Project will address water quality impairments for one of the highest priority watersheds in the Los Angeles Region through a facilitated stakeholder process. The resulting reports and analyses from the Project are intended to support and assist Region 9 and the RWQCB with adoption of the bacteria, organics, oils, metals, and historic pesticides/PCBs

TMDLs. The City is already committed to providing \$500,000 for the first year of the Los Angeles River TMDL Project, and will actively solicit monetary and in-kind contributions from other stakeholders in order to fund the remainder of the TMDL Project.

Based on a series of stakeholder meetings that the City convened in late 2003 and early 2004, stakeholders who expressed definite support for the Project include environmental groups, dischargers, state and local agencies, and various cities. In a highly urbanized area such as the Los Angeles River watershed, support by a diverse group of stakeholders [state water quality regulators, federal water quality regulators, environmental groups, dischargers, local communities, local agencies, and other stakeholders] is critical to effectively mitigate water quality impairments.

The Los Angeles River watershed is 834 square miles and is comprised of highly developed residential, commercial, and industrial areas, and open land uses. The mostly concrete channeled river drains the majority of Los Angeles County and flows 51 miles from its headwaters in the San Fernando Valley past downtown Los Angeles. The river eventually drains to San Pedro Bay near Long Beach. The tributaries, main stem, and estuary of the Los Angeles River have been identified under the Clean Water Act Section 303(d) list as not meeting water quality standards due to various water pollutants in the River including trash, nutrients, metals, bacteria, organics, and oils as well as, in the estuary, metals and historic pesticides/PCBs. The RWQCB considers most impaired segments of the Los Angeles River to be of high priority in a region that has the most waterbodies exceeding water quality standards in the state. TMDLs have been started or completed on all of the above noted Los Angeles River impairments except the latter five. Therefore, bacteria, organics, oils, estuary metals, and estuary historic pesticides/PCBs are the constituents for which TMDL Technical Supporting Reports will be prepared by this Project. Table 1 provides a summary of the Los Angeles River impairments for which TMDLs are necessary. Table 2 provides a summary of the estuary water quality impairments for which TMDLs are necessary.

On March 1999, the USEPA entered into a consent agreement in *Heal the Bay vs. Browner*. The consent agreement established a court-enforceable schedule through 2012 for TMDL development for certain watersheds including those for the Los Angeles River. As of January 2004, Region 9 has approved the trash and nutrient TMDL for the Los Angeles River and is close to the final public review stage for the metals TMDL.

**Table 1. Los Angeles River Water Quality Impairments Requiring TMDLs**

Los Angeles River Reach	Impairing Constituent [from 2002 303(d) list] *		
	Bacteria [high coliform count]	Organics – VOCs [DCE, PCE, TCE]	Oil and Grease
1 [Estuary to Carson Street]	<b>X</b>		

2 [Carson to Figueroa Street]	X		X
3 [Figueroa St. to Riverside Dr.]			
4 [Sepulveda Dr. to Sepulveda Dam]	X		
5 [within Sepulveda Basin]			X
6 [above Sepulveda Flood Basin]	X	X	

\* Listings are only for water column concentrations

**Table 2. Los Angeles River Estuary Water Quality Impairments Requiring TMDLs**

Location	Impairing Constituent [from 2002 303(d) list] *		
	Metals [zinc, lead]	Historic Pesticides [chlordane, DDT]	PCBs
Queensway Bay [161 acres]	X	X	X

\* Listings are only for sediment water quality-related impairments

In recognition of the importance of active stakeholder technical and financial participation in TMDL development, the RWQCB and Region 9 prepared a Draft Strategy in late 2002, which encouraged stakeholders to work with the RWQCB and Region 9 to develop TMDLs. The City's proposed Project conforms to the Draft Strategy and the RWQCB's and Region 9's intentions for greater stakeholder involvement in TMDLs. The City's Bureau of Sanitation will take the lead role in the Project.

Section 2 of this Workplan describes the initial tasks necessary for organizing stakeholders, and the tasks to be funded by the grant, as part of the TMDL Project for the Los Angeles River. The transparent nature of the proposed stakeholder-led process will ensure that the diverse perspectives and quality requirements of all stakeholders are accounted for. Also included in this Section is a brief overview of all the tasks necessary for completion of the TMDL Project for the Los Angeles River.

Section 3 of this Workplan provides a schedule for the tasks to be funded by the grant. This schedule is preliminary in order to allow for stakeholder input and involvement later in the process.

Section 4 of this Workplan provides a task-level cost estimate for a consultant, to be managed by the City, to assist the stakeholders in initiating and implementing the tasks to be funded by the grant.

The grant funding being requested by the City from Region 9 to support the tasks related to TMDL Project for the Los Angeles River is \$150,000 for FY 2004/2005. The overall TMDL Project is anticipated to take far longer than 1 year, and require far more funds than \$150,000, to complete. The City intends to seek additional state, federal, local government, and private funding to cover Project tasks beyond those funded by the FY 2004/2005 Region 9 award.

This version of the EPA grant Workplan represents a revision to previous versions that were drafted in 2004 when the grant application was submitted. This version of the EPA grant

Workplan incorporates recent updates to the LA River TMDL that include refined cost estimates for specific tasks. In addition, since the initiation of the grant application, Task 1 (Conducting Institutional/Organizational Tasks) of this Workplan has been initiated and is being funded by other sources. Therefore, the funding from this grant will apply to Task 2 (Develop Background Information – including field monitoring), which is estimated to cost more than the \$150,000 offered in this grant.

## **2. DESCRIPTION OF PROJECT TASKS**

This section of the Workplan describes the following:

- (1) initial tasks for organizing stakeholders (Task 1a-1b);
- (2) specific tasks to be wholly or partly funded by the grant (Tasks 2a-2d)

### **Task 1: CONDUCT INSTITUTIONAL / ORGANIZATIONAL TASKS**

Task 1 of this Workplan includes organizing a Los Angeles River stakeholders group to work on the bacteria, organics, and oils TMDL Technical Supporting Reports for the River, and on the metals and historic pesticides/PCBs TMDL Technical Supporting Reports for the estuary. Task 1 also includes development by the stakeholders of a draft and final Workplan for the Project. The Workplan will contain a final scope of work, the Project schedule, and the final estimated costs.

The 2 subtasks are discussed below.

#### **Subtask 1a. Organize Stakeholders Group**

The City will take the lead in organizing a Los Angeles River stakeholders group to oversee development of TMDL Technical Supporting Reports under this Project. The City, with the assistance of a TMDL consultant team, will draft a straw proposal for a stakeholders group including specialized subcommittees, a Steering Committee, and a Technical Committee to assist the stakeholders on technical issues. The RWQCB and Region 9 will be included in the stakeholders group.

The stakeholders group will be involved in reviewing all TMDL Technical Supporting Reports interim and final deliverables from the TMDL consultant, and in approving the overall direction of the Project.

*Workplan Revision Update: Subtask 1a has been completed and was funded from sources other than the grant.*

#### **Subtask 1b. Develop Draft and Final Workplan for the LA River TMDL Project**

The stakeholders group, with assistance from the TMDL consultant retained by the City, will develop an Overall Workplan for the LA River TMDL Project. The Overall Workplan will specify the tasks to be accomplished, a Project schedule including interim deliverables, and a budget for developing TMDL Technical Reports for LA River. The EPA grant Workplan will be incorporated as an element of the Overall Workplan.

Throughout the Project, efforts will be made to obtain input from stakeholders, during development of the Overall Workplan. Stakeholder meetings, technical workshops, e-mail, and maintenance of a Project website will be used to solicit input regarding key Project aspects.

The stakeholders' group Technical Committee [TC], which will include experts in the field of water chemistry, and ecology will assist in the review of the Overall Workplan and Project deliverables. Joint stakeholder / TC conference calls or meetings will be held to review issues of critical importance to the TMDL Project.

*EPA grant Workplan Revision Update: Subtask 1b has been initiated and is being funded from other sources than the grant.*

## **Task 2: DEVELOP BACKGROUND INFORMATION**

Task 2 of this EPA grant Workplan includes, for the five constituents of concern, reviewing, summarizing and assessing the adequacy of the existing Los Angeles River/estuary water quality data set, determining whether any data gaps exist and, if so, developing and implementing a monitoring and source assessment plan, and updating the existing data set with newly-acquired field monitoring data.

The 5 subtasks are discussed below.

### **Subtask 2a. Pollutant Identification and Description**

Background information will be collected on the general sources of the constituents of concern, and on the current knowledge of impairment mechanisms for bacteria, organics, oil, metals, and historic pesticides/PCBs. The beneficial uses in the watershed and estuary that are impacted by the constituents of concern will be described including the basic consequences of the impairment [lost natural resources, missed recreational opportunities, economic consequences, etc.].

### **Subtask 2b. Review and Summary of Data**

Available watershed data on water quality and sediment criteria exceedances for bacteria, organics, oil, metals, and historic pesticides/PCBs will be identified and collected including, using tables and GIS, the location and magnitude of the exceedances. A search will be initiated to obtain any relevant studies [RWQCB studies, USEPA studies, university studies, Corps of Engineers studies, NPDES permit receiving water monitoring data, SCCWRP, etc.] in the watershed. This task will seek environmental data generated both before and after the date of the 303(d) list, which prompted the TMDL effort. The existing data will be assessed for quality, and any QA/QC issues will be noted.

### **Subtask 2c. Assess Adequacy of Data and Data Needs**

The sufficiency of the existing watershed data on bacteria, organics, oil, metals, and historic pesticides/PCBs to support TMDL problem identification and source assessment will be analyzed. Data gaps and uncertainties that need to be filled to complete the TMDL process will be identified.

### **Subtask 2d. Develop and Implement Field Monitoring Program**

If determined to be necessary after existing environmental data on bacteria, organics, oil, metals, and historic pesticides/PCBs are compiled and qualified, a field monitoring program will be developed and implemented as part of the Project to cover gaps in data needed for problem identification and source assessment. The monitoring program will concentrate on the estuary as well as listed reaches, other reaches that the collected data indicate could also be impaired [even if not listed] and will cover the critical conditions as identified during the assessment of the pollutant problem. The schedule for the monitoring program will allow for approximately a 12-month field sampling period.

The field monitoring program will be planned to include state and USEPA QA/QC procedures. Preparation of drafts and finals of two monitoring program planning documents are included under this task: a Sampling and Analysis Plan (SAP), and a Quality Assurance Project Plan (QAPP). These monitoring program planning documents are intended to ensure that the resulting monitoring data for bacteria, organics, oil, metals, and historic pesticides/PCBs are credible, and will fill the data gaps for each constituent of concern. These monitoring program documents will be put out for stakeholder review and comments.

- Sampling and Analysis Plan

A separate SAP will be developed for each of the five constituents of concern – bacteria, organics, oil, metals, and historic pesticides/PCBs. The SAP will detail:

- Parameters to be sampled
- Sampling station locations and maps
- Sampling schedule
- Sampling crew contacts
- Steps for sampling event preparation and mobilization
- Sampling collection techniques [including sediment collection] to avoid sample contamination
- Chain of custody requirements
- Procedures for delivering samples to the lab to meet holding time limits
- Field crew protocols
- Special samples required for Quality Assurance / Quality Control [QA/QC] reasons
- Forms to be used to document the sampling events

- Quality Assurance Project Plan

A single QAPP will be prepared to cover the monitoring work for all five constituents of concern. A QAPP report will document the QA/QC procedures to be used in the design of the monitoring program so that the data will be credible and meet project needs. A QAPP is required for all USEPA-funded projects and must be approved by Region 9 prior to the start of sample collection. The QAPP for this Project will be prepared using the standard USEPA format, which requires details in the key areas of:

- Monitoring program management
- Measurement / data acquisition
- Assessment and oversight
- Data validation and usability

Data collected during this field monitoring effort will be integrated with the existing data to produce a complete data set for the reaches of concern.

Information, analyses, and reports obtained from Tasks 1 through 2 of this EPA grant Workplan will be used to support development of TMDL Technical Reports for LA River. The stakeholder group will proceed with the development of TMDL Technical reports by performing work as defined and described in the Overall Workplan. The performance of such work will be through the facilitated stakeholder group, and in collaboration with USEPA and RWQCB.

### **3. PROJECT SCHEDULE AND DELIVERABLES**

Table 3 contains a schedule for tasks to be funded wholly or partly by the grant.

### **4. PROJECT COST ESTIMATE**

A preliminary cost estimate has been provided in Table 3 and utilizes the same task structure outlined in the Overall Workplan (*cost estimate to be developed later*).

The cost estimate [consultant costs only] is broken down into labor and non-labor costs as follows:

- Estimated TMDL consultant labor costs.
- A 10% allowance [tied to labor costs] for the TMDL consultant's non-labor costs such as travel, materials, etc.
- Subcontractor costs [labs, peer reviewers, and other experts] for the task.

The City proposes to allocate all \$150,000 in Region 9 grant funds to the TMDL consultant contract under Tasks 1 and 2 as indicated in Table 3 on the next page. The subtasks for which grant funds are being requested will produce formal deliverables as noted.

**Table 3. Proposed Allocation of USEPA FY 2004/2005 104b(3) Grant Funds**

<b>Workplan Task</b>	<b>Task Cost Estimate</b>	<b>Proposed Coverage by EPA 104b(3) Grant Funds</b>	<b>Deliverable</b>	<b>Anticipated Schedule</b>
1. Conduct Institutional/Organizational Tasks	-----	No grant funding is requested; Task 1 has been initiated and is being funded by other sources.	Final Workplan for TMDL Technical Supporting Reports	Task started in 2004.  TMDL Workplans to be Completed in 2005.
2a. Review of Relevant Studies	-----	No grant funding is requested; task is planned to be funded by other sources.	A report summarizing the existing WQ/sediment data for the TMDL constituents; an LA River watershed GIS-based database; a technical memorandum summarizing the results of the data analysis.	Subtasks 2a & 2b: July – October
2b. Data Compilation				
2c. Data Analysis				
2d. Develop and Implement Field Monitoring Program**		\$150,000	1. Sampling/Analysis Plan [SAP]  2. QAPP  3. Report on Results of 12 months of field monitoring	SAP and QAPP to be started in Month #6 and completed in Month #7.  Field Monitoring Started in Month #8 and completed in Month #19.  Monitoring report started in Month #20 and completed in Month #21.
<b>Total &gt;&gt;&gt;&gt;</b>	-----	<b>\$150,000</b>		