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February 25, 2019

Deborah Smith, Executive Officer
Los Angeles Regional Water Quality Control Board
320 W. 4th Street, #200
Los Angeles, CA 90013

**SUBJECT: OVERVIEW OF PORT OF LOS ANGELES WATER AND SEDIMENT
QUALITY IMPROVEMENT ACTIVITIES**

The City of Los Angeles Harbor Department (Harbor Department) is actively involved in providing input to the Los Angeles Regional Water Quality Control Board (Regional Board) to support the Harbor Toxics Total Maximum Daily Load (TMDL) reconsideration process. Per your request, the following is an overview of actions the Harbor Department has taken since the promulgation of the TMDL to improve both water and sediment quality in the Los Angeles Harbor.

Dredging Program

The most direct and quantifiable among these actions are the capital and maintenance dredging projects the Harbor Department has undertaken at the Port of Los Angeles (Port). Even before the TMDL took effect, Port dredging activities contributed significantly to the overall reduction of contaminants in sediment throughout Los Angeles Harbor, through a series of channel deepening programs, habitat improvement projects, terminal redevelopment projects, and routine maintenance dredging. The substantial reduction of contaminants through these dredging programs has resulted in an ongoing improvement to sediment and water quality that continues today.

The Harbor Department has periodically deepened the Port's channels to allow for the navigation of larger ships. The most recent large-scale channel deepening program was completed in 2012. While the large majority of the dredging took place in the years immediately prior to the TMDL promulgation, it is important to note that most of the 303 (d) listings that drove the TMDL were based on sampling conducted prior to the project. The effects of that significant removal program continue to result in improved sediment and water quality. The Port's main navigation channels are now at -53 feet relative to Mean Lower Low Water (MLLW). In many areas of the Port, the remaining exposed layer is native material; thus dredging has removed decades of sediment accumulation.

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Department construction projects, which reduces inputs during construction activities. Harbor Department tenants, as independent entities, are responsible for obtaining and complying with the appropriate NPDES permit according to their Standard Industrial Classification code.

Many tenants obtain coverage under the statewide Industrial General Permit, and the remaining tenants comply with the MS4 permit or obtain an individually issued NPDES permit.

All of these program elements lead to a reduction of particulates from various sources, which in turn reduces sources of TMDL contaminants.

Following is a description of key Harbor Department programs that help improve water and sediment quality:

Tenant Outreach Program

The Harbor Department's Tenant Outreach Program is a comprehensive effort to support and guide tenants to minimize contaminated runoff through education, evaluation and application of appropriate BMPs. Tenants are visited by Harbor Department staff on an annual or biannual basis, depending on the type of use, potential to pollute and previous site visit results. Large container terminals and oil terminals are examples of facilities that are visited annually. Industrial permittees sample stormwater runoff for TMDL listed pollutants that may result from their operations. Environmental Management Division (EMD) staff visits a minimum of 60 and up to 100 tenants each year and can take up to 3-4 hours for large container terminals. Visits include support and coordination in complying with the necessary NPDES stormwater regulatory requirements, a review of the Stormwater Pollution Prevention Plan (SWPPP) and applicable water quality monitoring results, conversations with operators, and site tours and observations. Staff then makes recommendations to improve operational and structural BMPs that will result in the highest quality of stormwater run-off to Harbor waters. The EMD collaborates with other divisions to ensure that corrective measures under Harbor Department responsibility are implemented. Through outreach, the Harbor Department offers updates and training sessions regarding the variety of NPDES permits, permit updates and associated requirements. The Harbor Department uses a field application and online tools to streamline field visits and data management, increasing efficiency and reducing the need for paper.

14001-2015 ISO-certified Environmental Management System

The Harbor Department's ISO-certified Environmental Management System (EMS) identifies and minimizes the impacts of its activities on the environment and ensures an ongoing commitment to regulatory compliance in a thoughtful and proactive manner. It

sweeper in 2014, which is fitted with a high-efficiency centrifugal dust separator for maximum fine dust particulate separation. Sweeping routes are determined by prioritizing storm drain inlets based on percent fullness, MS4 regulatory requirements, and tenant agreements. The Harbor Department complies with MS4 permit implementation by prioritizing, cleaning and stenciling its 994 storm drain inlets and sweeping and removing litter from all Harbor Department - operated parking lots at least once per week. This is well above the minimum once-per-month requirement in the MS4. The Harbor Department has identified high priority areas and fitted several targeted storm drain inlets with debris screens to prevent sediment and trash from entering Harbor waters.

Port Activities under MS4

As the Harbor Department, we coordinate with our City Bureau of Sanitation Watershed Protection Division on MS4 compliance activities, as well as other water and sediment programs. Harbor Department operated facilities, such as the Construction and Maintenance yard, are covered under the MS4 permit for Public Agency Activity. Harbor Department employees actively participate with the California Stormwater Quality Association for the most up-to-date expertise from local and state regulators, and multiple associated working groups. Harbor Department employees whose activities affect stormwater quality are regularly trained on the requirements of the MS4 Best Management Practices (BMPs), on the Storm Water Pollution Prevention Plan (SWPPP) for Construction and Maintenance activities, and on how best to implement source control BMPs. As the recipient of discharges originating from upstream, the Harbor Department participates in the Dominguez Channel Watershed Management Group and the associated Enhanced Watershed Management Program and Coordinated Integrated Monitoring Plan.

Vessel Guidance

Proper management of discharges from vessels can reduce inputs of hydrocarbons, metals, invasive species and other constituents that can degrade water quality. To educate stakeholders, the Harbor Department, in conjunction with Port of Long Beach, completed a Vessel Discharge Rules and Regulations document, a guidance manual summarizing the various regulations pertaining to vessel discharges and maintenance activities. It was distributed to terminals and shipping lines to inform them on the 2008 Vessel General Permit (VGP) regulations. This document was updated and redistributed following the updates to the regulation that became effective in December of 2013. The Port also created and distributed a brochure to inform stakeholders on the requirements of the Small VGP that took effect in December of 2014.

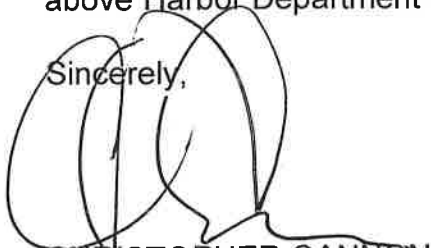
instead use aluminum alloy or ICCP. The use of anodes for cathodic protection during new construction is guided by Specification 2605, which dictates the use of aluminum alloy for any sacrificial anodes. Further, it was determined that the potential input of zinc into Los Angeles Harbor from cathodic protection of vessels was minor. At the time of the study, only 14 of the 34 vessels owned by the Harbor Department used cathodic protection, the rest used ICCP. Of the 14 vessels, only 4 could be determined to use zinc anodes, while others could do so in their outboard motors. A practice has now been established to replace zinc anodes on vessels with aluminum alloy anodes wherever feasible, and where doing so would not compromise the safety of the vessel or void a manufacturer's warrantee.

Trash Skimmers

The Harbor Department has purchased a total of nine trash skimmers that have been deployed in marinas and other areas of the Port. These skimmers draw in and hold trash, allowing for easy removal from the water. They have been placed in hard-to-reach locations where trash tends accumulate due to flow of water and wind patterns.

The Harbor Department remains committed to protecting and improving the quality of the harbor environment by implementing programs identified by the Harbor Toxics TMDL and taking actions above and beyond regulatory requirements. Please contact Andrew Jirik at (310) 732-3914 or via email at ajirik@portla.org, if you have any questions regarding the above Harbor Department activities.

Sincerely,



CHRISTOPHER CANNON
Director of Environmental Management

CC:LO:KP:Aj:yo
APP No.: 970203-532W

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