



November 17, 1995

Los Angeles County
Metropolitan
Transportation
Authority

TO: MTA BOARD OF DIRECTORS
FROM: STANLEY G. PHERNAMBUCO
SUBJECT: METRO RED LINE SEGMENT 1
ENVIRONMENTAL COMPLIANCE WITH REGARD TO
THE DISCHARGE OF SUMP WATERS TO
STORM DRAINS

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ISSUE

MTA has been informed that the discharge of ground water and other collected waters from the sumps at stations and tunnels are not in compliance with MTA's storm drain discharge permit. Corrective measures are being taken to bring the quality of discharge flows into compliance with the permit. There is no environmental threat to workers, the users of the Metro Rail system, or to the public at large. Construction safety and environmental compliance remain a high priority and MTA complies with all Environmental laws, regulations and procedures.

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BACKGROUND

The Regional Water Quality Control Board (RWQCB) has notified the MTA that the quality of discharged waters is not in compliance with permit requirements. Water discharged from some of the Metro Red Line Segment 1 sumps has exceeded allowable limits in suspended solids, oil and grease, pH balance, turbidity, arsenic and an organic compound. The organic compound was measured at trace levels in only one out of the nine sumps. The arsenic and the organic compound are from unknown sources, and is not as far as is presently known related to rail construction or operation.

The RWQCB has questioned the use of arsenic-containing treated wood as a possible source of arsenic. The City of Los Angeles requires treated wood for construction of shoring and retaining systems for building and underground construction, including MTA subway construction. Arsenic-containing treated wood is a typical material used for such systems. MTA environmental reports on ground water seepage

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have not shown clear evidence as to the source of arsenic in MTA sumps. Environmental studies have not been completed to show the source of the arsenic.

The MTA has an Operations Permit, known as a National Pollutant Discharge Elimination System (NPDES) Permit, for the discharge of waste water that is collected in the operating subway system. MTA waste water is collected in sumps from such sources as ground water seepage, wash down and cleaning water, occasional rain water, and fire system test water. Pursuant to the NPDES permit, MTA monitors the quality of its discharged waters and routinely submits monthly reports to the RWQCB. MTA reports have concluded that there is no substantial added environmental impact to downstream receiving waters from the discharge of arsenic and volatile organic compounds.

Corrective actions are being taken to bring the discharge flow into compliance. The MTA has completed environmental studies and has submitted a plan of proposed mitigation measures. The reports, and mitigation plan, are being reviewed by the RWQCB.

In addition, the MTA has prepared and submitted a report to the RWQCB describing proposed Best Management Practices for quality control of discharged water. The report contains a Operations and Maintenance Manual describing a more comprehensive means to control objectionable water quality in discharge flows. A pilot retrofit program is being installed in an existing sump to test effectiveness in controlling water quality. A seepage design contract is being negotiated reduce nuisance seepage flows of ground water into the subway system.

The MTA stands ready to implement additional improvements, if necessary, to assure compliance with the NPDES Permit requirements for water quality.