

Printed: 10-04-97
By: Sarah Holmgren
Priority: Normal
Topic: Revisions of Hg Water Quali
Sent: 10-04-97
From: rwoodard@ncal.net@INET1
To: Sarah Holmgren

NO response needed -
no comments directed
at CALFED

-Topic = CTR re: Mercury

Mail*Link»

Revisions of Hg Water Quality Criterion

>Return-Path: <Gfredlee@aol.com>
>From: Gfredlee@aol.com
>Date: Wed, 1 Oct 1997 12:11:17 -0400 (EDT)
>To: croylew@gwgate.swrcb.ca.gov
>cc: foec@gwgate.swrcb.ca.gov (chrisfoe),
> connorv@gwgate.swrcb.ca.gov (valconnor),
> brunsj@gwgate.swrcb.ca.gov (j.brun),
> rkrauss@homestake.com (raykrauss),
> david.morrison@yoloco.fabrik.com (davidmorrison), rwoodard@ncal.net
>Subject: Revisions of Hg Water Quality Criterion
>X-UIDL: 93f148e580772ad37a79220a3b6519f9

>_G. Fred Lee & Associates

>_____

> 27298 E. El Macero Dr.
> El Macero, California 95618-1005
> Tel. (916) 753-9630 Fax (916) 753-9956
> e-mail gfredlee@aol.com
> web site: <http://members.aol.com/gfredlee/gfl.htm>

>Via e-mail

>
>October 1, 1997
>William A. Croyle
>Standards, Policies and Special Studies
>CVRWQCB
>3443 Routier Road, Suite A
>Sacramento, CA 95827-3098

>Dear Bill:

>
>_I wish to follow up on my recent note of about a month ago concerning
>revisions of the mercury water quality criterion set forth in the proposed
>California Toxics Rule that could be of significance as it impacts the work
>on the Cache Creek mercury control programs to indicate that I have been
able
>to examine the changes that are proposed in the mercury water quality
>criterion as they affect bioaccumulation/human health.

>
>_As I indicated in the previous correspondence, the US EPA Region 9, as
part
>of developing the California Toxics Rule, has proposed to change the
current
>mercury water quality criterion from 12 ng/L to 50 ng/L for protection of
human health. While originally I thought that this value was based on

>dissolved mercury, Phil Wood of US EPA Region 9 has clarified the situation
>to indicate that it is based on total recoverable mercury. The US EPA
>California Toxics Rule proposed water quality criterion for protection of
>aquatic life due to mercury toxicity of 0.77 g/L is based on dissolved
mercury. The US EPA is, therefore, proposing to develop a separate
dissolved

>mercury criterion to address the toxicity of mercury to aquatic life.

>
> After extensive discussions with several individuals, I have determined
why

>the US EPA has raised the critical concentrations for mercury in water as
it

>relates to bioaccumulation in fish tissue from 12 ng/L to 50 ng/L. This
>change is contrary to essentially everything that is being done in
regulating

>mercury. As it turns out, this change to 50 ng/L is an interim value that
is

>the result of several changes in policy or new information that has been
>developed by the Agency. Basically, the US EPA has reverted back to a 1980
>approach for regulating mercury as an interim approach which, coupled with
>new information on the toxicity of mercury to humans, serves as a basis for
>the 50 ng/L value.

>
> Based on my discussions with several individuals who are familiar with
this

>area, the new criterion will likely be on the order of 2 to 5 ng/L for
total

>mercury. Therefore, rather than the mercury criterion increasing from 12
to

50 ng/L, ultimately it will likely decrease from 12 to 5 ng/L.

> The US EPA, as part of developing a national mercury strategy, has
developed

>a series of reports concerned with mercury issues which are available only
>through NTIS. The total cost of these reports is in excess of \$300. I
have

>personally ordered about \$200 of these reports. The Agency has submitted
>these reports to the Science Advisory Board for review. From the SAB
review

>will evolve a new water quality criterion for mercury. Presented below is
a

>listing of the copies of the US EPA reports that I have obtained that arose
>out of the US EPA national mercury study.

>
> Volume 1 Executive Summary, "Mercury Study Report to Congress," June
(1996).

> Volume 4, "Health Effects of Mercury and Mercury Compounds," June (1996)

> Volume 5, "Ecological Assessment of Anthropogenic Mercury Emissions in the
>United States," June (1996)

> Supplemental Materials for SAB Review, June (1996)

>
> If you have questions about these issues, please contact me. If I get
>additional information, I will pass it along to the group.

>

Sincerely yours,

Fred

>
>
> _____ G. Fred Lee, PhD, DEE
> Copy to: C. Foe
> _____ P. Krause
> _____ R. Woodard
> GFL:oh
>
>
>