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Subject: Response to Your Mercury Group Memo

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> June 12, 1997

>Christopher Foe

>CA Regional Water Qual Ctrl Board Central Valley Region

>3443 Routier Road

>Sacramento, CA 95827-3098

>

>Dear Chris:

>

> In response to you recent e-mail on reactivating the Mercury Technical

>Advisory Group, there is an urgent need in the Central Valley and San

>Francisco Bay regions, as well as elsewhere in the state and country, to

>formulate approaches that can be used to determine the origin of mercury that

>leads to excessive bioaccumulation in aquatic organism tissue. There are not

>sufficient funds to control all mercury inputs to waterbodies to levels that

>potentially do not lead to excessive bioaccumulation based on the total

>mercury input. This is especially true for the Sacramento River system,

>Delta and San Francisco Bay. Under these conditions, there is need to

>prioritize the use of mercury input control resources so that the funds made

>available to control mercury inputs are directed to controlling those inputs

>with the greatest significance with respect to reducing the excessive

>bioaccumulation of mercury in organisms of concern to the public. Adoption

>of this approach will be critical to CALFED formulating a technically valid,

>cost-effective mercury control policy for the Delta and San Francisco Bay to

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>the extent that the mercury problems in the Bay arise from input from the
>Sacramento River system/Delta.

>

> There is a general understanding today that the total mercury load to a
>waterbody or the total mercury content of sediments in a waterbody is a poor
>predictor of the bioaccumulation of mercury to hazardous levels. The basic
>problem is one of the relatively poor understanding of the aqueous
>environmental chemistry of various forms of mercury from various types of
>sources in various types of waterbodies as it leads to excessive
>bioaccumulation of mercury in fish tissue. Since we will not likely gain the
>necessary knowledge to put mercury control on a technically valid basis in
>the near future and since there is need to make decisions within the next few
>years on how to utilize the resources available and potentially available to
>control mercury-caused problems within the Sacramento River system, its
>watershed, the Delta and San Francisco Bay, there is need to formulate an
>approach which can be used in a weight-of-evidence, best professional
>judgement decision-making process to guide regulatory agencies, CALFED and
>others on the allocation of resources for mercury control.

>

> I wish to suggest that as a component of your Mercury Technical Advisory
>Group that one of the topics that this group and anyone else who is
>interested address is the development of a guidance document that formulates
>a mercury control strategy. This strategy should indicate the minimum
>information needed to formulate policy on whether controlling mercury from a
>particular source is likely to be effective in reducing the magnitude of
>excessive bioaccumulation of mercury in edible fish tissue. This strategy
>should also include the presentation of a monitoring program that would
>develop the kinds of information needed to evaluate the impact of altering
>mercury loads from a particular source or group of sources on the excessive
>bioaccumulation of mercury in fish tissue from fish taken from a waterbody of
>concern.

> I feel that the expert panel approach, where the panel operates in a full,
>public peer review arena to develop weight-of-evidence, best professional
>judgement guidance and decisions on water quality management is the approach
>that should and must be adopted. The mercury control situation provides an
>opportunity to initiate this approach on an important problem for the Central
>Valley region and the Bay. It is also a key component of the Cache Creek
>high-flow mercury situation that must be addressed.

>

> You asked about the possibility of submitting a proposal to CALFED on
>mercury issues. While there could be a number of proposals submitted to
>CALFED on various components of this matter, there should be a proposal
>submitted to support the development of an expert panel that would provide
>the guidance needed to formulate policy for mercury control where the
>resources made available are directed toward controlling the mercury inputs
>that are likely having the greatest impact on excessive bioaccumulation. To
>the extent that there is interest, I would be happy to work with the group in

