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November 27, 1996

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Mr. Rick Woodard
 Water Quality Program Manager
 CALFED Bay-Delta Program
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Dear Mr. Woodard:

Subject: Comments on Draft Plan for Analysis of Proposed Water Quality Actions

As requested during the meeting of the Water Quality Technical Work Group (WQTWG) on November 20, 1996, the Sacramento Regional County Sanitation District (District) is providing comments on the Draft Plan for Analysis given to us at that meeting. Although not specifically requested at this time, the District also is providing several comments on the table of Acceptable Ranges for Parameters of Concern that was also handed out at the same meeting.

Comments on Draft Plan for Analysis

The District has comments on seven of the ten water quality actions discussed, based on its direct experience with related actions. The comments are arranged by proposed water quality action items.

Mine Drainage Remediation

- The description for this action implies that such remediation will be largely financed through pollutant trading, funded primarily by publicly owned treatment works (POTW). Such trading agreements are complex and have little or no track record. While trading may work in some instances, its role should be significantly de-emphasized in this document.
- The data which is essential to the evaluation of control measures is very limited. Results from this analysis will be very approximate and may not be adequate for prioritization of control measures.
- Data limitations will also hamper water quality modeling efforts. What models are proposed for use in this effort? Are they suitable for prediction of downstream changes in levels of trace metals?

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Technology in balance with nature

- Will input from mining experts be sought in the development and evaluation of proposed control measures ?
- Despite the mention of pollutant trading in the description, the study steps do not refer to trading as a financing option. The District believes this position to be wise, and prefers that pollutant trading also be eliminated from the description.

Pesticide Reduction by Source Control

- The action description and several of the Study Steps refer to reductions in salts and microbial agents, while the title refers only to pesticides.
- The scope of this study effort is enormous, given the magnitude and diversity of the agricultural practices, crop types, soil types, pesticide uses, and water management practices in the Central Valley. Is there enough existing information to undertake these steps?
- Data limitations will again significantly limit the ability to evaluate various control measures. The results of this effort will be highly approximate.

Pesticide Reduction by Land Fallowing

- This action also includes mineral salts and microbial agents.
- Agricultural interests at the November 20 meeting raised significant concerns regarding the description of this action. In addition, agricultural groups have raised these and similar concerns at public meetings during Phase 1 of the CALFED Program, as well as at Bay-Delta Advisory Council meetings. Appropriate responses and modifications should be made to address those concerns.
- Data on water quality, particularly for pesticides, in rivers and drainage waters is limited.
- Once severe drainage problems have been defined, is available information adequate to identify such problems throughout the Central Valley?
- Study Step 5 refers to an assessment of toxic element and organic carbon reductions as a result of land fallowing. This appears to be an expansion of the scope of this item, which is aimed at pesticides, salts and pathogens.

- Due to data and information limitations, it is doubtful whether a prioritized list of land to be retired can be developed which will withstand critical review, especially where the findings are contentious. This seems to be overstepping the capability of current knowledge.

Reduce Urban Pollutant Loadings by Source Control

- The description of this action refers only to urban stormwater runoff loadings, not urban loading in general. The title should be revised.
- Again, the summary and analysis of stormwater discharge data and associated receiving water data for all communities in the Central Valley is a very large effort. It may be necessary to select several programs with the best data, prepare estimates for those areas, and extrapolate the results through the valley.
- Information on the effectiveness of stormwater BMP's is lacking. Progressive programs are just now developing this information, in pieces.
- The prioritization of stormwater source control measures will be compromised by data limitations.

Reduce Urban Pollutant Loadings by Better Planning of New Construction

- Use of the words "better planning" presumes that current efforts are deficient. The District suggests substituting the words "Implementation of Additional Control Measures for New Construction".
- Information on the water quality benefit to be achieved through changes in control measures for new construction is lacking. Again, the prioritized list will be weakly supported.

Source Control by Watershed Management

- Many watershed management programs are now in the developmental stage. Hard information from these programs regarding water quality and ecological resources will be rare. Information on control measures and effectiveness has typically not been developed yet.
- Identification of projects which will or will not need CALFED financial support will probably not be possible.
- Prioritization of watershed management projects will be very subjective.

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Time San Joaquin Valley Drainage to Improve Water Quality

No comments.

Control Waste Discharges from Boats in the Delta

No comments.

Undertake Toxicity Bioassay and Identification Testing

- Little data using sound QA/QC procedures exists, and most of that will have been obtained in the past few years. Consequently, the significant data gaps will likely be very large.
- Great care will have to be taken in identifying appropriate methods for assessing toxicity in water, and especially in sediment.
- Toxicity testing and TIEs have recently started (Fall 1996) as part of the Sacramento River Toxic Pollutant Control Program (SRTPCP). This program, initiated by the District, presently has staff of the Central Valley Regional Water Quality Control Board and U. C. Davis both taking samples throughout the Sacramento River watershed and conducting laboratory analyses.
- Also as a part of the SRTPCP a monitoring program focused on surface water quality is being developed for the entire watershed. Results of this effort, which includes public agencies and other stakeholders throughout the watershed, should be useful in the development of the proposed monitoring program.

Financial Incentives for Integrated Pest Management for Agriculture

No comments.

In general, the District believes that the efforts proposed by the CALFED plan should be qualified appropriately based on known limitations regarding data and simplifying assumptions which will have to be made.

Comments on Table of Acceptable Ranges of Parameters of Concern

As we discussed on the phone today, the District is happy to hear that the title of this table will be changed, because it would have serious concerns with the words "Acceptable Ranges". Many of the values listed in the table are not legally adopted objectives and, as such, have not been deemed acceptable from a legal, scientific or policy perspective. The process of adopting legally

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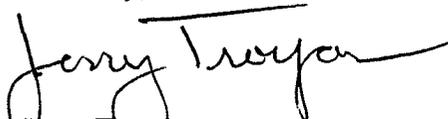
enforceable objectives forces consideration of numerous factors, including but not limited to scientific validity and/or uncertainty, risk level, attainability and economic effect.

The District suggests the following changes in this table:

- Change the title to "Target Levels" or "Criteria and Guidelines". Additionally, the first footnote in the table should clearly state which values are legally enforceable objectives and which are not. The footnote should also state that values which are not objectives should not be used to imply beneficial use impairment or adverse water quality impacts.
- Consider use of the FDA action level of 1.0 mg/kg for mercury in fish tissue.
- Consider use of ERMs or other sediment values in lieu of ERLs. If ERLs are shown, show a range consisting of ERL to ERM sediment values.
- The EPA criteria shown in the table are not legally enforceable in the Sacramento, San Joaquin or Delta at the present time. Such criteria are expected to be proposed in 1997 by EPA as part of the California Toxics Rule. Enforceable standards based on these EPA criteria will not be adopted in California until late 1997 or 1998.

The District is pleased to provide these comments and to have been invited to participate in this important process.

Sincerely,



Jerry Troyan
Associate Civil Engineer

JJT:mgd

cc: R. Shanks, C. Creson, S. Dean, M. James, Tom Grovhoug,(Larry Walker Associates)

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