



*TMDLs for legacy chemicals
(PCBs and DDT) are not based
on reliable technical information*

*Comments to State Water Board
on behalf of Montrose Chemical
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Charles A. Menzie, Ph.D.
camenzie@exponent.com



Bio for Charles Menzie Ph.D.

- Director of Ecological and Biological Sciences Practice
- 40 years experience
- Nationally recognized for work on environmental risk assessment and fate and effects of chemicals
- Member of the California Sediment Quality Objective (SQO) Scientific Steering Committee



The TMDLs for legacy chemicals are not based on reliable technical information or analysis

- **Technical problems:**
 - Incomplete and likely incorrect conceptual model
 - Loads have not been properly accounted for or modeled
 - TMDLs are based only on an estimated deposition pattern
 - TMDLs are “sediment-only”, ignore the system, and will be difficult to implement
- **Management consequences**
 - Decisions will not be supported by sound science
 - Correcting the above problems will become increasingly difficult as management actions are set into motion



Major technical issues

- TMDLs are based on a belief (not data or modeling) that sediments are the source and will remain constant
- TMDLs based only on estimated solids deposition and ignore the system including solids inputs and by-pass
- Atmospheric loads were incorrectly assigned to sediments
- Extremely low target levels have been chosen despite the known uncertainties associated with their use
- The derivation process has not relied on the state's own SQO guidance
- The TMDL derivation method and proposed implementation are unique to the LA Region



Assimilative capacity has been ignored

- Because sediments are treated only as the source, their important role for assimilative capacity has been missed
- The inputs of solids into and out of the system are critical aspects for assimilative capacity
- Because these are critical aspects, the TMDL's failure to account for them renders it unsound and unreliable