



California Regional Water Quality Control Board

Central Coast Region



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(805) 549-3147 • FAX (805) 543-0397
<http://www.waterboards.ca.gov/centralcoast>

Matthew Rodriguez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

August 19, 2011

Dane Hardin
Central Coast Long-Term Environmental Assessment Network
hardin@amarine.com
P.O. Box 8346
Santa Cruz, CA 95061

Sent via Electronic Mail only

Dear Mr. Hardin:

SUBJECT: PROPOSAL TO MODIFY CENTRAL COAST LONG-TERM ENVIRONMENTAL ASSESSMENT NETWORK (CCLEAN) MONITORING PROGRAM FOR CARMEL AREA WASTEWATER DISTRICT (WDID 3 270101001), CITY OF SANTA CRUZ WASTEWATER TREATMENT PLANT (WDID 3 440102001), CITY OF WATSONVILLE WASTEWATER TREATMENT PLANT (WDID 3 440104001), & MONTEREY REGIONAL WATER POLLUTION CONTROL AGENCY WASTEWATER TREATMENT PLANT (WDID 3 270118002)

Thank you for your letter of July 12, 2011, sent to Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff proposing several revisions to the basic CCLEAN study design. CCLEAN monitoring is a requirement in waste discharge requirements and National Pollutant Discharge Elimination System (NPDES) permits adopted by the Central Coast Water Board for the Carmel Area Wastewater District (NPDES CA0047996) City of Santa Cruz Wastewater Treatment Plant (NPDES CA0048194), City of Watsonville Wastewater Treatment Plant (NPDES CA0048216), and Monterey Regional Water Pollution Control Agency Wastewater Treatment Plant (NPDES CA0048551).

CCLEAN monitoring and reporting program revisions include addition of a new objective to manage the program adaptively to be responsive to emerging issues and to ensure cost effectiveness. Proposed changes to monitoring include the following:

- Reduction of sampling at ambient offshore sediment monitoring (for chemistry and benthic invertebrates) from annually to once per permit term, and addition of pyrethroid pesticides to the sediment analyte list. Reduced frequency would reduce the power of detecting trends at these sites, but concentrations of legacy chemicals measured at these locations show no detectable trends, even when data from the 1970's are included. Reduced frequency will still provide data sufficient to characterize site status and to detect emerging problems. The proposed addition of pyrethroids will provide data on currently used and persistent urban pesticides commonly associated with toxicity.
- Elimination of perfluorinated compounds (PFCs) from all sample types, and elimination of polynuclear aromatic hydrocarbons (PAHs) from sediment and mussel sampling. PAHs have not been associated with any impairments in sediment or mussel data to date. PFSs have no regulatory limits, and though they are routinely detected in

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wastewater they have never been detected in mussels and only rarely detected in sediment, at low levels. CCLEAN will include an analysis and discussion of PFCs in wastewater in their upcoming annual report.

- Perform broader ocean sampling of polychlorinated biphenyls (PCBs) and chlorinated pesticides in ocean waters to more fully investigate causes of high nearshore concentrations. The study design for this will be developed during the upcoming fiscal year.
- CCLEAN must submit a revised Quality Assurance Project Plan describing these program changes by November 1, 2011.

In accordance with California Water Code section 13167.5, the Central Coast Water Board is providing notice and a comment period of 30 days before modifying Waste Discharge Requirements Orders for the Carmel Area Wastewater District (Order No. R3-2008-007), City of Santa Cruz Wastewater Treatment Plant (Order No. R3-2010-0043), City of Watsonville Wastewater Treatment Plant (Order No. R3-2008-0016), and Monterey Regional Water Pollution Control Agency Wastewater Treatment Plant (Order No. R3-2008-0008).

Interested persons may download CCLEAN's letter dated July 12, 2011 describing the proposed monitoring revisions from the Water Board's website at:

<http://www.waterboards.ca.gov/centralcoast/Permits/Index.htm>.

Scroll down to "CCLEAN Monitoring Proposal 07-12-2011" and select link to the right.

Persons wishing to comment on the Proposal must submit comments in writing to the address below or directly to Ms. Karen Worcester via email at kworcester@waterboards.ca.gov no later than **September 25, 2011**. Comments submitted after that date will not be accepted into the record. Please send written comments to:

Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

If you have questions regarding adjustments to the regional monitoring approach, please contact **Karen Worcester at (805) 549-3333** or Sheila Soderberg at (805) 549-3592.

Sincerely,



Roger W. Briggs
Executive Officer

cc:

Akin Babatola, City of Santa Cruz ababatola@cityofsantacruz.com

Bob Geyer, City of Watsonville, bgeyer@ci.watsonville.ca.us

Barbara Pierson, City of Watsonville, bperson@ci.watsonville.ca.us

Garrett Haertel, Monterey Regional Water Pollution Control Agency, garrett@mrwpc.com

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Monterey Regional Interested Parties List
Carmel Area Interested Parties List
City of Watsonville Interested Parties List
City of Santa Cruz Interested Parties List

CCLEAN ID CW-651530
City of Santa Cruz Place ID 255619
City of Watsonville Place ID 271872
Monterey Regional Place ID 241740
Carmel Area Place ID 213281

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