



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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File No. 31-370.40.4A

Mr. Man Voong  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013

Dear Mr. Voong:

## **Comments on the April 2009 Proposed 2008 Los Angeles Region Clean Water Act Section 303(d) List of Impaired Waters**

The Sanitation Districts of Los Angeles County ("Sanitation Districts") appreciate the opportunity to comment on the April 2009 proposed 2008 Los Angeles Region Clean Water Act Section 303(d) List of Impaired Waters ("303(d) List") prepared by the California Regional Water Quality Control Board, Los Angeles Region ("Regional Board"). The Sanitation Districts are a consortium of 24 independent special districts serving the wastewater and solid waste management needs of over five million people and 3,300 industries in Los Angeles County, California. The Sanitation Districts currently operate and maintain over 1,400 miles of trunk sewers and 11 wastewater treatment plants that collectively treat over 450 million gallons per day of wastewater. Of the 11 wastewater treatment plants, nine are located in the Los Angeles Region. Seven of these treatment plants discharge to inland surface waters in the San Gabriel River, Santa Clara River, and Rio Hondo watersheds; one discharges to the Pacific Ocean; and one does not discharge to surface waters but instead solely supplies recycled water for irrigation.

First, the Sanitation Districts would like to take this opportunity to commend Regional Board staff for their diligent implementation of the State Water Resources Control Board's ("State Board's") Quality Control Policy for Developing California's Clean Water Act Section 303(d) List ("Listing Policy") to produce, for the most part, a well-documented and scientifically valid 303(d) List. In addition, the Sanitation Districts greatly appreciate the efforts of the Regional Board to make the listing process more transparent, particularly through making the data used to assess listings available on the Regional Board's website and through production of clear fact sheets on each water body/pollutant combination.

Although the Sanitation Districts support the overall methodology used by the Regional Board to produce the 303(d) List, the Sanitation Districts do have concerns on some aspects of it, particularly where the methodology used was not consistent with direction provided by the State Board in their Listing Policy. General comments relating to these concerns are provided below and detailed specific comments are provided in Attachment 1 and appendices to this letter.

### *1. Nutrient Criteria Should Not be Promulgated as Part of the 303(d) Listing Process*

Section 3.3.3 of the 2008 Update of the Los Angeles Region Integrated Report Clean Water Act Section 305(b) Report and Section 303(d) List of Impaired Waters (“303(d) List Staff Report”) states that in the current 303(d) List update, nitrogen impairment decisions continue to be based on the current Basin Plan objectives for nitrogen compounds. However, in the 303(d) List Staff Report the Regional Board proposes to use a new methodology for assessing nutrient-related impairments in the future. This methodology would rely on an assessment of both nutrient concentrations and one or more biological response indicators such as pH and dissolved oxygen.

While we commend the Regional Board for recognizing the significant issues associated with eutrophication and nutrient-related impairments, the 303(d) List Staff Report is an inappropriate vehicle to introduce proposed nutrient criteria and objectives. Promulgation of new nutrient criteria and/or implementation policies related thereto constitutes an amendment to the Basin Plan, and should therefore be handled exclusively through appropriate Basin Plan amendment procedures. Adoption of Basin Plan amendments requires fulfilling the requirements of California Environmental Quality Act (“CEQA”) as well as conducting an analysis in accordance with California Water Code 13241/13000 factors. The appropriate time to consider whether numeric nutrient criteria should be pursued is during the triennial review of the Basin Plan. During this and subsequent basin plan amendment review, the costs and benefits of adopting such criteria can be assessed and the priority for pursuing the criteria can be weighed against other basin planning priorities.

Notwithstanding our previous objection that proposed Basin Plan objectives and/or implementation policies related thereto should only be addressed through an appropriate Basin Plan amendment process, the Sanitation Districts have a number of concerns with the nutrient and biological response criteria approach proposed by the Regional Board. The Sanitation Districts do not believe that it is appropriate for the Regional Board to pursue development of numeric nutrient criteria at this time. The State Board, in conjunction with the United States Environmental Protection Agency (“USEPA”) Region 9, has been actively working for a number of years on the development of numeric nutrient endpoint (“NNE”) tools for California to address nutrient objectives. Statewide tools to assess nutrient impairments in freshwater streams and lakes are currently being peer reviewed, with ongoing validation studies being conducted for estuaries. These tools utilize biological indicators to assess nutrient impairments (excess algal biomass and extremes in photosynthesis-caused dissolved oxygen and pH). The State Board and USEPA have put extensive resources toward development of scientifically sound NNE tools. To avoid duplication of effort, the Regional Board should wait until the State Board releases its NNE tools before considering whether it should develop its own independent nutrient objectives. The approach to nutrient criteria developed by the State Board and USEPA Region 9 is described in the report, “Technical Approach to Develop Nutrient Numeric Endpoints for California” (“CA NNE”), released in 2006. The CA NNE report calls for using multiple lines of biological responses to make an assessment of impairment. Based on this assessment, if an impairment exists, then nutrient concentrations can be examined to determine if they are causing or contributing to the impairment, and nutrient standards can then be developed as appropriate. In preparing this report, the State Board and other experts correctly recognized that ambient nutrient concentrations typically do not correlate with algal/nutrient related impairments, and thus nutrient concentrations should **not** be used to assess whether an impairment exists. In conflict with the Statewide approach, the Regional Board approach includes nutrient concentrations (i.e., total nitrogen and phosphorous) as a line of evidence to use when assessing whether an impairment exists. Beneficial use impairment only occurs when, independent of nutrient loading, the biological response is of sufficient magnitude to adversely impact the use.

Examples of the proposed Regional Board approach to nutrient criteria are presented in Tables 3-2 and 3-3 of the 303(d) List Staff Report. In this table, the Regional Board lists criteria from a number of different sources, including the 2000 USEPA National Nutrient Criteria Technical Guidance ("National Guidance") and the subsequent 2001 USEPA Ecoregion III Nutrient Criteria Recommendations for Rivers and Streams ("Ecoregion III Guidance"). The purpose of the National Guidance was not to recommend specific nutrient criteria, but rather to describe an approach to be used by the states to develop such criteria. The numbers cited by the Regional Board in Tables 3-2 and 3-3 of the 303(d) List Staff Report from the National Guidance were taken from a table listing a number of examples of numeric thresholds drawn from various studies. No justification was provided by the Regional Board as to why these particular values were chosen, or why these particular values would be applicable to waterbodies in the Los Angeles Region. Furthermore, the approach described in the National Guidance and in the Ecoregion III Guidance, which covers the Xeric West ecoregion that includes most of the Los Angeles Basin, has been widely criticized for its technical shortcomings. Under this approach, criteria for nutrients are set at the 25<sup>th</sup> percentile of nutrient concentrations for all waterbodies within an ecoregion. This arbitrarily delineates 75% of the waterbodies in a region as impaired. Additionally, no attempt was made in the guidance documents to show a relationship between the nutrient criteria and eutrophic conditions that would affect beneficial uses. In response to these and other flaws, the guidance was never adopted in California, and the State Board and USEPA Region 9 continued to pursue efforts to develop guidance specific to California, as described above.

Another criteria source listed by the Regional Board was a New Zealand guidance document. The Sanitation Districts believe that criteria for another continent should not be used without a high degree of scrutiny to ensure that it is appropriate for the Los Angeles Region. A site-specific study for Malibu Creek was also referenced; however, criteria for one specific water body should not be applied region-wide unless a technical review indicates that it is appropriate region-wide. The last source mentioned is the State Board NNE screening tools for 303(d) listing. While the Sanitation Districts concur that the State Board's NNE guidance, as presented in the CA NNE report, is the most appropriate guidance currently available, the Regional Board's tables do not accurately portray the guidance in the report. In particular, the pH, dissolved oxygen, total nitrogen, and total phosphorus criteria listed in Table 3-2 for the State Board NNE screening tools for 303(d) listing are not consistent with the CA NNE report. Additionally, the criteria listed for benthic algal biomass are misrepresented; the criteria listed are not meant to be used to determine impairments, but rather, to distinguish between waterbodies that are definitely not impaired versus those that are potentially impaired, but for which further study is needed to assess an impairment.

Overall, regarding assessment of nutrient impairments, the Sanitation Districts recommend that the Regional Board not develop its own policy at this time, or in this forum. Where assessment of nutrient impairments is necessary prior to release of statewide nutrient criteria, the Regional Board should refer to the CA NNE for guidance. Should the Regional Board elect to develop regional nutrient criteria, this should be accomplished through the Basin Plan amendment process.

## **2. All Listings Based on the P\* MUN Beneficial Use should be Removed**

The Sanitation Districts believe that the following water body/pollutant combinations should not be added to the 303(d) List:

**Coyote Creek** - sulfate and TDS (based on application of secondary MCLs)

**San Gabriel River Reach 1** - TDS (based on application of secondary MCLs)

**San Jose Creek Reach 1** - sulfate (based on application of secondary MCLs)

**Santa Clara River Reach 5** - iron, specific conductivity (based on secondary MCLs); chlorodibromomethane, dichlorobromomethane (based on application of California Toxics Rule (CTR) human health criteria using water plus organisms)

**Santa Clara River Reach 6** - iron, specific conductivity (based on secondary MCLs); chlorodibromomethane, dichlorobromomethane, bis(2-ethylhexyl)phthalate (based on application of CTR human health criteria using water plus organisms)

These new proposed listings are erroneously based on application of the conditional Municipal and Domestic Supply (P\* MUN) beneficial use. A federal court, the State Board, and the USEPA have all determined that the P\*MUN beneficial use is not a properly designated use available for any regulatory purpose, including assessment of water bodies for inclusion on the Regional Board's proposed 2008 303(d) List. The application of the conditional P\* MUN beneficial use resulted in the incorrect application of maximum contaminant levels (MCLs) and CTR human health criteria using "water plus organisms" standards.

As background, in 1994, the Regional Board chose to designate a Municipal and Domestic Supply (MUN) beneficial use to all water bodies identified in the Basin Plan as a response to the State Board's issuance of Resolution No. 88-63 (the "Sources of Drinking Water Policy") and the Regional Board's companion resolution, Resolution No. 89-03. However, the Regional Board also recognized that additional technical work was needed before such designations could validly occur, and included the following language in the Basin Plan, at pages 2-3 and 2-4:

"These policies [Res. 88-63 and 89-03] allow for Regional Boards to consider the allowance of certain exceptions according to criteria set forth in SB Resolution 88-63. While supporting the protection of all waters that may be used as a municipal water supply in the future, the Regional Board realizes that there may be exceptions to this policy.

In recognition of this fact, the Regional Board will soon implement a detailed review of criteria in the State Sources of Drinking Water policy and identify those waters in the Region that should be excepted from the MUN designation. Such exceptions will be proposed under a special Basin Plan Amendment and will apply exclusively to those waters designated as MUN under SB Res. No. 88-63 and RB Res. No. 89-03.

In the interim, no new effluent limitations will be placed in Waste Discharge Requirements as a results [sic] of these designations until the Regional Board adopts this amendment."

In accordance with this Basin Plan implementation provision, Table 2-1 of the Basin Plan (which sets forth the beneficial uses of inland surface waters) contains a distinct designation, in form of the P\* MUN use, for the MUN use that was purportedly conditionally designated pursuant to Res. Nos. 88-63

and 89-03. At the bottom of each page of Table 2-1, a footnote exists to explain the asterisk, as follows: “\* Asterixed MUN designations are designated under SB 88-63 and RB 89-03. Some designations may be considered for exemptions at a later date. (See pages 2-3,4 for more details).”

Following a judicial challenge to the USEPA’s partial approval/partial disapproval of these Basin Plan provisions, in December 2001 the U.S. District Court for the Central District of California found that the beneficial use designation of P\* MUN was only a “conditional” designation, and that implementation of the beneficial use could not occur until or unless the Regional Board undertook the study referenced in the Basin Plan provision and revised the Basin Plan accordingly. See Order Granting Plaintiffs’ Motion for Summary Judgment and Remanding Action to EPA in *Cities of Los Angeles, Burbank, and Simi Valley, and County Sanitation Districts of Los Angeles County v. U.S. EPA, et al.*, U.S. District Court, Central District, Case No. 00-08919 R(RZx) (December 18, 2001) (included as Attachment 2). The District Court directed USEPA to approve the Basin Plan provisions in accordance with the decision, and on February 15, 2002, the USEPA approved the provisions as follows:

“I. Municipal and Domestic Supply Designation (“MUN”)

In today’s action, EPA approves in whole the 1994 Basin Plan. EPA bases its approval on the court’s finding that the Regional Board’s identification of waters with an asterisk (\*) in conjunction with the implementation language at page 2-4 of the 1994 Basin Plan, was intended “to only conditionally designate and not finally designate as MUN those water bodies identified by an (\*) for the MUN use in Table 2-1 of the Basin Plan without further action.” Court Order at p. 4. **Thus, the waters identified with an (\*) in Table 2-1 do not have MUN as a designated use until such time as the State undertakes additional study and modifies its Basin Plan. Because this conditional use designation has no legal effect,** it does not constitute a new water quality standard subject to EPA review under section 303(c)(3) of the Clean Water Act ...” [emphasis added]

See February 15, 2002 letter from Alexis Strauss, Director, Water Division, USEPA to Celeste Cantu, Executive Director, State Water Board (included as Attachment 3).

During the previous 303(d) List update in 2006, the Regional Board included water body segments on that proposed 303(d) List based on the P\* MUN beneficial use. After receiving comments objecting to this action, similar to the Sanitation Districts comments herein, the State Board removed all of the proposed 303(d) listings based on the P\* MUN beneficial use, stating that the P\* MUN beneficial use should not be used for listing purposes, and is not a designated beneficial use for the identified water bodies.<sup>1</sup> No change to the status of the P\* MUN beneficial use has occurred since the above described actions; therefore, the Sanitation Districts recommend that the Regional Board act in accordance with the State Board’s previous determination on this issue.

In summary, the P\* MUN beneficial use as currently set forth in the Basin Plan does not yet designate the water bodies at issue with any MUN-related beneficial use. Thus, no 303(d) listing decisions can be based on the P\* MUN beneficial use and resulting application of MCLs and CTR human health criteria using “water plus organisms” standards. The Sanitation Districts therefore request that these water body/pollutant listings noted above be removed from the Regional Board’s proposed 2008 303(d) List.

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<sup>1</sup> Staff Report, Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments, Response to Comments, State Board, September 2006, at pages 69, 82, 91-92 (pertaining to listings for Coyote Creek, San Gabriel River Reach 2, Santa Clara River Reaches 5 & 6), 94, 101, 105, and 106.

### ***3. Listing Analyses Should be Consistent with State Board Direction***

In addition to addressing application of the P\*MUN use when it evaluated the 2006 303(d) List, the State Board provided direction on several additional issues, to ensure statewide consistency in assessment of water body impairments.<sup>2</sup> These issues include the use of dissolved and total fraction metals data, the use of wet and dry weather data, and the use of concurrent or average hardness values for hardness-dependent metals. The Regional Board failed to adhere to this direction when making several listing decisions. The Sanitation Districts believe that consistent application of the guidance provided by the State Board will result in a cohesive, well-documented, and scientifically valid 303(d) List, and urge the Regional Board to follow this guidance.

### ***4. Additional Data Should be Included Where Appropriate***

In several instances the Sanitation Districts' analyses of listing decisions reached different conclusions than the Regional Board analyses because the Sanitation Districts were able to identify additional data that, when considered together with the data considered by the Regional Board, demonstrate attainment. In all instances, the Sanitation Districts believe that these data meet the definition of "existing and readily available data," and therefore must be considered by the Regional Board.<sup>3</sup> In most cases, these data were collected as part of NPDES permit monitoring requirements and were submitted to the Regional Board in discharge monitoring reports. The data were, therefore, in the possession of the Regional Board. In some cases, the data were collected after the initial data solicitation for the 2008 303 (d) List, and a large enough dataset is now available to meet the minimum number of samples required for listing/delisting. In all of these instances, re-examination of the proposed decisions with respect to listing is warranted to ensure that sound listings decisions are made in accordance with the Listing Policy.

### ***5. Specific Comments on Listing Decisions***

In addition to these general comments, the Sanitation Districts have specific comments on the listing decisions for a number of water body/pollutant combinations. Detailed specific comments are provided in the appendices to this letter, and Attachment 1 includes a tabular summary of the specific comments. Based on review of the data and fact sheets released for public comment, the Sanitation Districts have identified a number of water body/pollutant combinations proposed for inclusion on the 2008 303(d) List that are attaining water quality standards and therefore qualify for delisting (or, alternatively, when they are not already on the 303(d) List do not qualify for listing). The Sanitation Districts believe it is very important for the Regional Board to follow-up on this information and make changes to the proposed 2008 303(d) List where appropriate, since the implications of erroneous listings are substantial.

### ***6. Support Proposed Delistings for Certain Water body/Pollutant Combinations***

The Sanitation Districts have reviewed the Regional Board's 303(d) listing analyses for the water body/pollutant combinations listed below. The Sanitation Districts believe the analyses are technically sound, and support the Regional Board's decisions to remove these water body/pollutant combinations from the 303(d) list:

- Ballona Creek - silver

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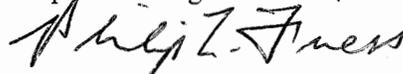
<sup>2</sup> Staff Report, Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments, Response to Comments, State Board, September 2006.

<sup>3</sup> Listing Policy, Section 6.1.1, p. 17, stating, "at a minimum, readily available data and information includes... receiving water monitoring data from discharger monitoring reports."

- Coyote Creek – zinc
- Los Angeles River Estuary - lead (sediment) and zinc (sediment)
- Rio Hondo Reach 2 - ammonia
- San Jose Creek - selenium
- Wilmington Drain - ammonia
- Walnut Creek Wash - toxicity

In conclusion, the Sanitation Districts would like to thank the Regional Board for its efforts in revising the proposed 2008 303(d) List. We urge the Regional Board to take the final step in revising this list and to consider the information and analysis we are submitting to complete the development of a scientifically and legally defensible list with a sound and consistent basis. If you have any questions regarding our comments or the information and data we are providing to you, please contact Ken Hoffman at (562) 908-4288, extension 2445, [khoffman@lacsdsd.org](mailto:khoffman@lacsdsd.org)

Very truly yours,  
Stephen R. Maguin



Phillip L. Friess  
Departmental Engineer  
Technical Services Department

PLF:KMH:lmb  
Attachments

cc: LB Nye, Regional Board, Los Angeles Region

ATTACHMENT 1

**Table 1: Summary of Comments on Specific 303(d) Listings**

Fact Sheet	Water Body	Constituent	Regional Board Proposed Decision	Sanitation Districts Recommendation	Reason
A	San Gabriel River Estuary	Copper	Do Not Delist	Delist	Water quality objective being achieved
B	Coyote Creek	Ammonia	Do Not Delist	Delist	Water quality objective being achieved
C	Santa Clara River Reach 6	Copper	List	Do not list	Water quality objective being achieved
D	San Gabriel River Reach 2	Cyanide	List	Do not list	Water quality objective being achieved
E	Santa Clara River Reach 6	Chlorpyrifos	Do Not Delist	Delist	Water quality objective being achieved
F	San Gabriel River Estuary	Nickel	List	Do not list	Insufficient Basis to List
G	Santa Clara River Reach 6	Diazinon	Do Not Delist	Delist	Water quality objective being achieved
H	San Gabriel River Reach 1	Total Dissolved Solids	List	Do not list	Beneficial Use is wrong for water Body; MCLs do not apply
	Coyote Creek	Total Dissolved Solids & Sulfate			
	Santa Clara River Reaches 5 and 6	Iron & Conductivity			
I	Coyote Creek	Diazinon	List	Do not list	Water quality objective being achieved
J	Coyote Creek	Copper	Do Not Delist	Delist	Water quality objective being achieved
K	Coyote Creek	Lead	Do Not Delist	Delist	Water quality objective being achieved
L	San Gabriel River Reach 2	Lead	List	Delist	Water quality objective being achieved
M	Santa Clara River Reaches 5 and 6	Chlorodibromomethane	List	Do not list	Beneficial Use is wrong for water Body; MCLs do not apply
N	Santa Clara River Reaches 5 and 6	Dichlorobromomethane	List	Do not list	Beneficial Use is wrong for water Body; MCLs do not apply
O	San Jose Creek Reach 1	Ammonia	Do Not Delist	Delist	Water quality objective being achieved
P	Santa Clara River Reach 5	Ammonia	Do Not Delist	Delist	Water quality objective being achieved
Q	Santa Clara River Reach 5	Nitrate and Nitrite	Do Not Delist	Delist	Water quality objective being achieved
R	Santa Clara River Reach 6	Ammonia	Do Not Delist	Delist	Water quality objective being achieved
S	Santa Clara River Reach 5	Polychlorinated biphenyls (PCBs)	List	Do not list	Insufficient Basis to List
T	Santa Clara River Reach 5	DDT	List	Do not list	Insufficient Basis to List
U	Santa Clara River Reach 6	Bis(2ethylhexyl)phthalate (DEHP)	List	Do not list	Water quality objective being achieved
V	Walnut Creek	Copper	List	Do not list	Water quality objective being achieved
W	Santa Clara River Estuary	Arsenic	List	Do not list	Water quality objective being achieved
X	Walnut Creek	Lead	List	Do not list	Water quality objective being achieved

## ATTACHMENT 1

### FACT SHEET A

**Water Body:** San Gabriel River Estuary  
**Pollutant:** Copper

**Listing:** Listed on the 303(d) List (Being Addressed by EPA Approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objective Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing that this listing be moved to the list of constituents “being addressed by an EPA-approved TMDL.” In 2006 the Environmental Protection Agency (EPA) added copper impairment to the 303(d) List for the San Gabriel River Estuary (SGRE) based on total copper monitoring data, and a TMDL for copper was completed by EPA in March 2007.

#### *State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the State Board addressed the issue of using total metals data to assess impairments, stating:

“The CTR [California Toxic Rule] mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions.”<sup>1</sup>

#### *Existing Listing Reevaluation*

As stated by the State Board, only the dissolved fraction of metals should be used for comparison with the CTR criteria. Therefore, in accordance with State Board direction, the copper listing should be reevaluated using only dissolved copper data. After the 2006 listing cycle, the Sanitation Districts of Los Angeles County (Sanitation Districts) and Los Angeles Department of Water and Power (LADWP) began conducting dissolved copper analyses on SGRE samples. Table A1 of Appendix A contains the results of this dissolved copper monitoring. From the 120 total usable samples, ninety four-day chronic criteria averages were calculated, none of which exceeded the Criterion Continuous Concentration (CCC) for dissolved copper of 3.1 µg/L for marine waters. The Water Quality Control Policy for Developing California’s Clean Water Act Section 303(d) List requires a minimum of twenty-eight samples with no more than two exceeding the water quality standard to remove a previously listed water segment from the 303(d) list. For a sample size from 95 to 106, Table 4.1 of the State’s listing policy recommends delisting a previously listed pollutant/water body combination if the number exceedances are equal or less than eight. Since ninety four-day average dissolved copper results through February 2009 show no exceedances of the CCC, copper should be delisted from the SGRE.

<sup>1</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

## ATTACHMENT 1

### *EPA Method 200.8 compared with EPA Method 1640*

Additionally, dissolved copper data presented in Table A1 were generated using EPA Method 200.8 and EPA Method 1640. It is well documented that EPA Method 200.8 is susceptible to salt interferences, resulting in an over-estimation of the total copper concentration when used to analyze samples with elevated salinity. This is caused by sodium in the sample combining with argon used in the instrumentation to form a complex that has the same molecular weight as copper. Although this interference can be partially minimized with varying success by using collision cell techniques and sample dilution, the potential for a significant over-estimation of the actual copper concentrations remains. Additionally, increased sample dilution leads to unacceptably high detection limits. Sample dilution when using EPA Method 200.8 often results in reporting levels (RL) in excess of the 3.1 µg/L water quality objective.

In 1997, to address the shortcomings of EPA Method 200.8 the EPA developed and subsequently approved EPA Method 1640 for the quantification of trace metals. EPA Method 1640, in addition to requiring the use of "clean" sampling procedures, addresses the sodium/argon interference by incorporating a chelation preparation step that removes the metal from the matrix before ICPMS analysis. Using dissolved copper measurements obtained by EPA Method 1640 for 303(d) listing determination eliminates multiple confounding factors such as the ambiguity regarding the use of an appropriate dissolution translator and allows for direct evaluation of the impairment condition.

Results in Table A1 demonstrate the superiority of EPA Method 1640 as opposed to EPA Method 200.8. Analyses obtained from EPA Method 200.8 yielded only four usable samples while analysis using EPA Method 1640 yielded 116 usable samples. EPA Method 1640 clearly generates more accurate results and, for the purposes of assessing the validity of the 303(d) listing, should be the only method considered. Of the 86 samples analyzed using EPA Method 1640, no samples exceed the CCC of 3.1 µg/L for marine waters.

## ATTACHMENT 1

### FACT SHEET B

**Water Body:** Coyote Creek  
**Pollutant:** Ammonia

**Listing:** Listed on the 303(d) List (Being Addressed by Actions Other than a TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

Site-specific objectives (SSOs) for ammonia were developed for Coyote Creek and became effective and adopted into the Basin Plan on April 23, 2009. However, these objectives were approved by the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) in 2007 and subsequently approved by the State Water Resources Control Board in January 2008. Considering that the Regional Board has been aware of these impending changes to the Basin Plan since 2007, the chronic ammonia water quality standards reflected in the SSO should have been used to evaluate ammonia listings for this 303(d) listing cycle.

#### *Existing Listing Reevaluation*

An examination of the Coyote Creek ammonia, pH, and temperature data provided to the Regional Board as part of their 303(d) listing review (March 2004 through February 2007) reveals that the four-day chronic SSO-adjusted Criterion Continuous Concentration (CCC) threshold for ammonia was only exceeded in Coyote Creek on 17 occasions out of a total 374 measurements, as presented in Appendix B Table B1. For a sample size of 363 to 374 the State's 303(d) listing policy, using the binomial distribution formula associated with Table 4.1, recommends delisting a previously listed pollutant/water body combination if the number of exceedances are equal to or fewer than 31. Since 374 four-day average ammonia results show 17 exceedances of the CCC, ammonia should be delisted from Coyote Creek.

## ATTACHMENT 1

### FACT SHEET C

**Water Body:** Santa Clara River Reach 6  
**Pollutant:** Copper

**Listing:** List on the 303(d) List (TMDL required list)

**Comment & Recommendation:** Do not list – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing that a new listing for copper be made to the 303(d) list in Santa Clara River Reach 6. The fact sheet for copper in Santa Clara River Reach 6 states six of 21 samples exceeded the “CTR [California Toxics Rule] water quality standard for copper (acute) that is 13.44 ppb. The standard is hardness dependent based on a hardness value of 100.” The fact sheet also states the standard was compared against data collected at Los Angeles County MS4 Mass Emission Santa Clara River Monitoring Station (S29 - San Francisquito Creek) for data collected from October 31, 2003 to April 2, 2007. It is unclear if the Regional Board’s assessment was made using total or dissolved copper data for this recommended listing, but it should be noted that the CTR copper values are expressed as a dissolved fraction.

#### *State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the use of dissolved and total fraction metals data, the use of wet and dry weather data, and the use of concurrent or average hardness values were all discussed. The State Board directed that dissolved fraction metals data should be used for assessing listings when available, and total fraction data may be used only for listing reevaluation when dissolved fraction data is unavailable:

“The CTR mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions.”<sup>2</sup>

Also, the State Board stated in this report that both wet and dry weather data must be used to assess listings unless the Basin Plan includes specific wet and dry weather water quality standards:

“Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant.”<sup>3</sup>

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<sup>2</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

<sup>3</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments:107.19), September 2006.

## ATTACHMENT 1

Finally, the State Board provided the following guidance on the appropriate hardness to use for listing assessment:

“Revisions were made to fact sheets in order to clarify how the hardness based criteria was calculated. In almost all cases, the criteria was calculated for each individual sample using the hardness value for that sample. However, there were a few instances where only the average hardness data was available and used. In cases where the average value was used, recommendations were to not list so using this average value did not result in any new listings.”<sup>4</sup>

### *Proposed Listing Reevaluation*

In accordance with the State Board’s direction, when listings are assessed: all dry weather and wet weather data should be used; dissolved metals data should be used when available; total metals data may be used when dissolved metals data are not available only for reevaluation of listings; concurrent hardness values should be used when available; and average hardness should be used when concurrent hardness is not available.

Using the concurrently measured hardness to evaluate the hardness-dependent CTR copper objectives, the chronic water quality objectives ranged from 8.2 to 36.6 µg/L for dissolved copper. For the purposes of calculating the hardness dependent CTR copper objectives, concurrently measured hardness was also used when available and the average of all location hardness measurements collected were used when concurrent hardness was not measured. To reevaluate the proposed listing, total copper measurements collected and reported to the Regional Board by the Sanitation Districts of Los Angeles County (Sanitation Districts) in the Santa Clara River Reach 6 during approximately the same time period (2004 through April 2007) should be considered. Although dissolved copper was not measured in the Sanitation Districts data set, it is conservative to estimate that 100% of the measured total copper was in the dissolved form as described by the September 2006 State Board comments mentioned above. With these conservative assumptions, and combining the Sanitation Districts’ data with the MS4 data, a total of three copper exceedances of the Criterion Continuous Concentration (CCC) were observed out of sample size of 69 and two copper exceedances of the Criterion Maximum Concentration (CMC) were observed out of sample size of 71. For a sample size from 60 to 71, Table 3.1 of the State’s listing policy recommends a pollutant/water body combination be listed if the number exceedances are equal or greater than six. Therefore, the proposed copper listing in Santa Clara River Reach 6 should be rejected. A complete summary of the copper and hardness data along with the CTR hardness dependant objective calculations can be found in Appendix C - Table C1.

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<sup>4</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 171 (Comments:81.3), September 2006.

# ATTACHMENT 1

## FACT SHEET D

**Water Body:** San Gabriel River Reach 2  
**Pollutant:** Cyanide

**Listing:** List on the 303(d) List (TMDL Required List)

**Comment & Recommendation:** Do not list – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing a new listing for cyanide on the 303(d) list in San Gabriel River Reach 2. The fact sheet prepared by the Regional Board for cyanide in San Gabriel River Reach 2 states “Eight of 20 samples exceeded the California Toxics Rule (CTR) Criterion Continuous Concentration (CCC) for Cyanide and one of 20 samples exceeded the Criterion Maximum Concentration (CMC).” The data included with the fact sheet was collected from October 2003 to April 2007 at Los Angeles County Department of Public Works (LACDPW) MS4 mass emission monitoring station S14, which located downstream of San Gabriel River Parkway.

### *State Water Resource Control Board Guidance*

In September 2006, the State Water Resources Control Board (State Board) was clear in response to comments during the 303(d) listing cycle that both wet and dry weather data must be used for assessment unless the Basin Plan includes provision for separating wet and dry weather data:

“Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant.”<sup>5</sup>

### *Proposed Listing Reevaluation*

As confirmed by the State Board, wet and dry weather data are necessary to examine possible listing on the 303(d) list. The Regional Board, however, neglected to include other available data in San Gabriel River Reach 2 for the cyanide listing assessment. Although it is unclear whether the omission of data by the Regional Board was accidental, the dry weather data must be included in accordance with the State Board’s guidance. Thus, an additional 108 San Gabriel River Reach 2 cyanide samples collected during the same time period by the Sanitation Districts of Los Angeles County (Sanitation Districts) should be included in the evaluation. From this data set, only one of the additional 106 four-day averages exceeds the 5.2 µg/L CCC water quality standard for cyanide (see Appendix D - Table D1). Combining the two data sets results in nine exceedances of the CCC for cyanide out of 124 four-day averages. For a sample size from 118 to 129, Table 3.1 of the State’s listing policy recommends a pollutant/water body combination be listed if the number exceedances are equal or greater than eleven. Therefore, cyanide for Reach 2 of the San Gabriel River should not be included on the 2008 303(d) List.

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<sup>5</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments:107.19), September 2006.

## ATTACHMENT 1

### FACT SHEET E

**Water Body:** Santa Clara River Reach 6  
**Pollutant:** Chlorpyrifos

**Listing:** Listed on the 303(d) List (TMDL Required List)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved or List – “Being Addressed by Actions Other Than TMDL”

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) included chlorpyrifos for Reach 6 of the Santa Clara River during the 2006 listing cycle. Their evaluation of available data indicated an impairment of the California Department of Fish Game four-day Criterion Continuous Concentration (CCC) threshold of 0.05 µg/L using data collected as part of the Surface Water Ambient Monitoring Program (SWAMP) study conducted in Bouquet Canyon Creek (SCTBQT) from 2001 through 2003.

#### *Existing Listing Reevaluation*

A contemporary analysis of available data from October 2001 to April 2008 yields two valid sample results collected by the SWAMP and 33 valid sample results collected by the Los Angeles County Department of Public Works (LADPW) at the Los Angeles County MS4 Mass Emission Santa Clara River Monitoring Station (S29 - San Francisquito Creek). This dataset along with the associated CCC objective can be found in Appendix E - Table E1. Evaluation of these samples for comparison to the CCC results in two observed exceedances of the four-day average with a sample size of 32. For a sample size from 28 to 36, Table 4.1 of the State’s listing policy recommends delisting a previously listed pollutant/water body combination if the number exceedances are equal or less than two.

#### *Recategorization of Listing*

Finally, it should be noted that EPA has been phasing out all non-agricultural uses of chlorpyrifos with the cessation of sales of all indoor and outdoor residential use products by December 31, 2004. Consideration of data since January 1, 2005 yields 18 four-day average chlorpyrifos results with no exceedances of the 0.05 µg/L threshold. This listing should be moved to the “Water Quality Limited Segments Being Addressed by Actions Other Than a TMDL” list since this residential use phase-out of chlorpyrifos is a regulatory action (other than a TMDL) and appears to be resulting in attainment of standards.

## ATTACHMENT 1

### FACT SHEET F

**Water Body:** San Gabriel River Estuary  
**Pollutant:** Nickel  
**Listing:** List on the 303(d) List (TMDL required list)  
**Comment & Recommendation:** Do Not List – Insufficient Basis to List

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing to add nickel to the 2008 303(d) List for the San Gabriel River Estuary. The fact sheet for nickel in San Gabriel River Estuary states “13 of 47 samples exceed the California Toxics Rule Criterion Continuous Concentration (CCC)” and the “California Toxics Rule (CTR) lists a Criterion Continuous Concentration of 8.2 µg/L and a Criterion Maximum Concentration (CMC) of 74 µg/L for nickel to protect aquatic life in saltwater for the total fraction.”

#### *California Toxic Rule and State Water Resources Control Board Guidance*

Footnote m of the CTR, which is applicable to nickel, states that the CCC and CMC are expressed as the dissolved fraction of the metal, not the total concentration. The CTR states:

“These freshwater and saltwater criteria for metals are expressed in terms of the dissolved fraction of the metal in the water column.”<sup>6</sup>

The use of dissolved metal criteria and data to assess 303(d) listing was clearly stated by the State Water Resources Control Board (State Board) in response to comments for the 2006 303(d) listing cycle. The State Board stated:

“The CTR [California Toxic Rule] mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions.”<sup>7</sup>

#### *Proposed Listing Reevaluation*

The analysis conducted to justify the nickel listing was incorrect. The analysis using the CTR was conducted by comparing the CCC and CMC against the total fraction of nickel. The correct approach is to assess whether there is an impairment by comparing dissolved nickel data to the CMC and CCC. The fact sheet states that data collected by the Sanitation Districts of Los Angeles County and Los Angeles Department of Water and Power were used for the listing. Both of these data sets contain only total nickel results for the San Gabriel River Estuary, so this data should not have been used to assess whether there is impairment. Since no data is available for the purposes of evaluating an impairment, nickel should not be added to the 2008 303(d) List for the San Gabriel River Estuary.

<sup>6</sup> Water Quality Standards; Establishment of Numeric Criteria for Priority Toxic Pollutants for the State of California; Rule, 40 CFR Part 131, page 31716, footnote m, May 18, 2000.

<sup>7</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

## ATTACHMENT 1

### FACT SHEET G

**Water Body:** Santa Clara River Reach 6  
**Pollutant:** Diazinon

**Listing:** Listed on the 303(d) List (TMDL Required List)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved or List - “Being Addressed by Actions Other Than TMDL”

The California Regional Water Quality Control Board, Los Angeles (Regional Board) included diazinon for Reach 6 of the Santa Clara River during the 2006 listing cycle because their evaluation of available data indicated that the California Department of Fish and Game (CDFG) four-day Criterion Continuous Concentration (CCC) threshold of 0.10 µg/L diazinon<sup>8</sup> was exceeded in samples collected from Bouquet Canyon Creek. All of the utilized monitoring data was collected as part of a Surface Water Ambient Monitoring Program (SWAMP). A contemporary analysis of available data finds 2 valid samples available from the SWAMP program, 33 samples collected by the Los Angeles County Department of Public Works, and 25 samples collected by the Sanitation Districts of Los Angeles County (Sanitation Districts). This dataset is attached as Appendix G – Table G1.

#### *State Water Resource Control Board Guidance*

Section 6.1.5.3 of the Water Quality Control Policy for Developing California’s Clean Water Act Section 303(d) List states:

“If the implementation of a management practice(s) has resulted in a change in the water body segment, only recently collected data [since the implementation of the management measure(s)] should be considered.”

#### *Existing Listing Reevaluation*

By December 31, 2004, Environmental Protection Agency (EPA) bans on sales of all indoor and outdoor non-agricultural products containing diazinon took effect. EPA’s action should be considered implementation of a significant management practice in Reach 6 of the Santa Clara River. Accordingly, only data collected since January 1, 2005 should only be used for listing reevaluation. If data generated after the residential use ban (January 1, 2005) to April 2007 is considered, only two four-day average diazinon results exceeded the CCC with a sample size of 29. For a sample size of 28-36, Table 4.1 of the State’s listing policy recommends delisting a previously listed pollutant/water body combination if the number of exceedances are equal or less than two. In addition, the most recently available data shows no exceedances were found in nine samples collected between April 2007 and July 2008. Therefore, diazinon in Reach 6 of the Santa Clara River should be removed from the 303(d) list.

#### *Recategorization of Listing*

In addition, prior to delisting this listing should be moved to the “Water Quality Limited Segments Being Addressed by Actions Other Than a TMDL” category since the EPA residential use phase-out of diazinon is a regulatory action (other than a TMDL) and has been successful in attaining compliance with standards.

<sup>8</sup> At the time of original listing, the CDFG CCC for diazinon was 0.08 and was has since been modified to 0.10 µg/L diazinon.

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## Fact Sheet H

**Water Body/Pollutant:** San Gabriel River Reach 1 - Total Dissolved Solids  
Coyote Creek - Total Dissolved Solids and Sulfate  
Santa Clara River Reach 5 and 6 - Iron and Specific Conductivity

**Listing:** List on the 303(d) List (TMDL required list)

**Comment & Recommendation:** Do Not List – Beneficial Use is Wrong for Water Body; MCLs Do Not Apply

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing new 303(d) listing for the following water body/pollutant combinations: San Gabriel River Reach 1 for total dissolved solids; Coyote Creek total dissolved for solids and sulfate; and Santa Clara River Reaches 5 and 6 each for iron and specific conductivity. These listings are based on the application of the California Department of Health Services secondary drinking water standards based on the conditional potential municipal and domestic supply (P\* MUN) beneficial use of these reaches.

### *P\*MUN Beneficial Use and State Water Resources Control Board Guidance*

These new listings are improperly based on the conditional potential municipal and domestic supply (P\* MUN) beneficial use. A federal court,<sup>9</sup> the State Water Resources Control Board (State Board), and the United States Environmental Protection Agency (USEPA) have all determined that the P\* MUN beneficial use designation has no legal effect at this time. Water quality objectives derived from the P\* MUN beneficial use should not be used to assess 303(d) listings.

### *Proposed Listing Reevaluations*

No Basin Plan objectives or California Toxics Rule (CTR) standards apply to any of these water body/pollutant combinations. Since no objectives or standards are available for the purposes of evaluating potential impairments of these water body/pollutant combinations, they should not be added to the 2008 303(d) List.

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<sup>9</sup> *Cities of Los Angeles, Burbank, and Simi Valley, and County Sanitation Districts of Los Angeles County v. U.S. EPA, et al.*, U.S. District Court, Central District, Case No. 00-08919 R(RZx) (December 18, 2001)

## ATTACHMENT 1

### FACT SHEET I

**Water Body:** Coyote Creek  
**Pollutant:** Diazinon

**Listing:** Listed on the 303(d) List (TMDL Required List)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) included diazinon for Coyote Creek during the 2006 listing cycle because their evaluation of available data indicated that the California Department of Fish and Game (CDFG) four-day Criterion Continuous Concentration (CCC) threshold of 0.10 µg/L diazinon<sup>10</sup> was exceeded in samples collected by the Los Angeles County Department of Public Works (LACDPW) and the Sanitation Districts of Los Angeles County (Sanitation Districts). A contemporary analysis of available data indicates that 31 diazinon samples are now available from the LACDPW and 42 diazinon samples are now available from the Sanitation Districts to reassess the listing. This dataset is attached as Appendix I – Table II.

#### *State Water Resource Control Board Guidance*

Section 6.1.5.3 of the Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List states:

“If the implementation of a management practice(s) has resulted in a change in the water body segment, only recently collected data [since the implementation of the management measure(s)] should be considered.”

#### *Existing Listing Reevaluation*

By December 31, 2004, Environmental Protection Agency (EPA) bans on sales of all indoor and outdoor non-agricultural products containing diazinon took effect. EPA's action should be considered implementation of a significant management practice in Coyote Creek, since the primary sources of water to Coyote Creek are non-agricultural and the ban has essentially eliminated urban sources of diazinon. Accordingly, only data collected since January 1, 2005 should be used for listing reevaluation. If data generated after the residential use ban (January 1, 2005) to April 2008 is considered, only three four-day average diazinon results exceeded the CCC with a sample size of 51. For a sample size from 48 to 59, Table 4.1 of the State's listing policy recommends delisting a previously listed pollutant/water body combination if the number exceedances are equal or less than four. Therefore, diazinon in Coyote Creek should be removed from the 303(d) list.

#### *Recategorization of Listing*

While the data indicate that this pollutant/water body combination should be delisted, at minimum it should be moved to the “Water Quality Limited Segments Being Addressed by Actions Other Than a TMDL” category. The EPA residential use phase-out of diazinon is a regulatory action (other than a TMDL) that has been successful in significantly reducing diazinon concentrations in Coyote Creek.

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<sup>10</sup> At the time of original listing, the CDFG CCC for diazinon was 0.08 and was has since been modified to 0.10 µg/L diazinon.

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## FACT SHEET J

**Water Body:** Coyote Creek  
**Pollutant:** Copper

**Listing:** List on the 303(d) List (Being Addressed by an EPA-Approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

Coyote Creek is currently listed for copper under the category of being addressed by an EPA-approved TMDL. The original listing determination was made prior to 2006, using total copper data in the reach collected by the Los Angeles County Department of Public Works (LACDPW) and the Sanitation Districts of Los Angeles County (Sanitation Districts). EPA completed a TMDL for copper in March 2007.

### *State Water Resource Control Board*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the State Board addressed the issue of using total metals data to assess impairments, stating:

“The CTR [California Toxic Rule] mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions.”<sup>11</sup>

Also, the State Board stated in this report that both wet and dry weather data must be used to assess listings unless the Basin Plan includes specific wet and dry weather water quality standards:

“Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant.”<sup>12</sup>

Finally, the State Board provided the following guidance on the appropriate hardness to use for listing assessment:

“Revisions were made to fact sheets in order to clarify how the hardness based criteria was calculated. In almost all cases, the criteria was calculated for each individual sample using the hardness value for that sample. However, there were a few instances where only the average hardness data was available and used. In cases where the average value was used, recommendations were to not list so using this average value did not result in any new listings.”<sup>13</sup>

<sup>11</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

<sup>12</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments:107.19), September 2006.

<sup>13</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 171 (Comments:81.3), September 2006.

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### *Existing Listing Reevaluation*

In accordance with the State Board's direction, when listings are assessed: all dry weather and wet weather data should be used; dissolved metals data should be used when available; total metals data may be used when dissolved metals data are not available only for reevaluation of listings; concurrent hardness values should be used when available; and average hardness should be used when concurrent hardness is not available.

Using the concurrently measured hardness to evaluate the hardness-dependent CTR copper objectives, the chronic water quality objectives ranged from 4.3 to 42.8 µg/L for dissolved copper. For the purposes of calculating the hardness-dependent CTR copper objectives, concurrently measured hardness was used when available and the average of all hardness measurements collected at a location were used when concurrent hardness was not measured. To reevaluate the existing listing, total copper measurements collected and reported to the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) by the Sanitation Districts in Coyote Creek during approximately the same time period (2004 through April 2007) should be considered in addition to the LACDPW dissolved copper data. A complete summary of the copper and hardness data along with the CTR hardness-dependent objective calculations can be found in Appendix J - Table J1. Although dissolved copper was not measured in the Sanitation Districts data set, it is conservative to estimate that 100% of the measured total copper was in the dissolved form as described by the September 2006 State Board comments mentioned above. With these conservative assumptions, and combining the Sanitation Districts data with the MS4 data, there were no copper exceedances of the Criterion Maximum Concentration (CMC) observed out of sample size of 121 and one exceedance of the Criterion Continuous Concentration (CCC) was observed out of sample size of 111. For a sample size of 107 to 117, Table 4.1 of the State 303(d) listing policy recommends delisting a pollutant/water body combination if the number of exceedances are equal or less than nine. Therefore, copper in Coyote Creek should be delisted.

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## Fact Sheet K

**Water Body:** Coyote Creek  
**Pollutant:** Lead

**Listing:** List on the 303(d) List (Being addressed by an EPA-approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing not to delist lead in Coyote Creek. The fact sheet for lead in Coyote Creek states, “based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against removing this water segment-pollutant combination from the section 303(d) list” and further indicates that seven of 45 samples exceeded the hardness-dependent California Toxics Rule (CTR) Criterion Continuous Concentration (CCC) for lead and zero of 75 samples exceeded the CCC for the total fraction. The fact sheet also states that the standard was compared against data collected at Los Angeles County MS4 Coyote Creek Monitoring Station (S13) for data collected from 1995 through April 2007. The Regional Board’s assessment correctly utilized dissolved metal results and calculated the CCC using concurrently collected hardness. However, an error was detected in the Regional Board’s CCC calculations provided in the fact sheet. Specifically, the four-day average dissolved lead was not evaluated against the four-day average CCC when two or more measurements were collected in a four-day period.

### *State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the use of dissolved and total fraction metals data, the use of wet and dry weather data, and the use of concurrent or average hardness values were all discussed. Dissolved fraction metals data should be used for assessing listings when available, and total fraction data may be used only for listing reevaluation when dissolved fraction data is unavailable:

“The CTR [California Toxic Rule] mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions.”<sup>14</sup>

Also, the State Board stated in this report that both wet and dry weather data must be used to assess listings unless the Basin Plan includes specific wet and dry weather water quality standards:

“Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant.”<sup>15</sup>

<sup>14</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

<sup>15</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments:107.19), September 2006.

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### *Fact Sheet Formula Error*

An error was found in Excel data file accompanying the 2008 listing fact sheet for Coyote Creek lead analysis. The formula in the Chronic Criteria data field is:

“=(EXP((1.23\*LN(J2)-4.705))\*(1.46203-LN(J2)\*0.145712))”

The CTR defines the CCC objective equation as:

“CCC = WER x (Acute Conversion Factor) x exp{ $m_c \ln(\text{hardness}) + b_c$ }  
where for lead:  $m_c = 1.273$ ,  $b_c = -4.705$ , WER = 1, and the Acute Conversion Factor (CF) is:  
“CF = 1.46203 - [(ln {hardness})(0.145712)]”

It appears the  $m_c$  value as 1.23 used in the Regional Board analysis is incorrect and should have been entered as 1.273.

### *The Weight of Evidence Section of the Fact Sheet states:*

“Seven of 45 samples exceeded the lead CTR Criterion Continuous Concentration for the dissolved fraction, zero out of 75 samples exceeded the lead CTR Criterion Continuous Concentration for the total fraction, and this exceeds the allowable frequency listed in Table 4.1 of the Listing Policy for the dissolved fraction.”

### *Proposed Listing Reevaluation*

In accordance with the State Board’s direction, when listings are assessed: all dry weather and wet weather data should be used; dissolved metals data should be used when available; total metals data may be used when dissolved metals data are not available for reevaluation of listings; concurrent hardness values should be used when available; and average hardness should be used when concurrent hardness is not available.

The Regional Board’s interpretation of the number of exceedances and number of samples in the weight of evidence section is clearly incorrect as the CTR does not have a total fraction CCC and dissolved fraction CCC. The CTR only includes a dissolved fraction CCC. The dissolved and total lead data sets should be combined for the purposes of assessing the lead listing when this is done, the data indicate seven exceedances of the dissolved fraction CCC out of 120 samples. For a sample size from 118 to 129, Table 4.1 of the State’s listing policy recommends delisting a pollutant/water body combination if the number exceedances are equal or less than ten. Therefore, lead in Coyote Creek should be delisted.

Further, using the concurrently measured hardness to evaluate the hardness-dependent CTR lead objectives, the chronic water quality objectives ranged from 0.9 to 20.6  $\mu\text{g/L}$  for dissolved lead. For the purposes of calculating the hardness-dependent CTR lead objectives, concurrently measured hardness was used when available and the average of all location hardness measurements collected were used when concurrent hardness was not available. To reevaluate the existing listing, total lead measurements collected and reported to the Regional Board by the Sanitation Districts of Los Angeles County (Sanitation Districts) in the Coyote Creek during approximately the same time period (1995 through April 2007) should be considered. A complete summary of the lead and hardness data, along with the CTR hardness-dependent objective calculations, can be found in Appendix K - Table K1. Although dissolved lead was not measured in the Sanitation Districts data set, it is conservative to estimate that 100% of the measured total lead was in the dissolved form as described by the September 2006 State Board comments mentioned above. With these conservative assumptions, and combining the Sanitation Districts data with

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the MS4 data, no exceedances of the Criterion Maximum Concentration (CMC) for lead were observed and nine exceedances of the CCC for lead were observed out of sample size of 195. For a sample size from 188 to 199 the State's listing policy, using the binomial distribution formula associated with Table 4.1, recommends delisting a pollutant/water body combination if the number of exceedances are equal to or less than sixteen. Therefore, lead in Coyote Creek should be delisted.

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## Fact Sheet L

**Water Body:** San Gabriel River Reach 2  
**Pollutant:** Lead

**Listing:** List on the 303(d) List (Being addressed by an EPA-approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing not to delist lead in San Gabriel River Reach 2. The fact sheet for lead in San Gabriel River Reach 2 states “based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against removing this water segment-pollutant combination from the section 303(d) list” and further indicates that eight of 56 samples exceeded the hardness dependent California Toxics Rule (CTR) Criterion Continuous Concentration (CCC) for lead with no Criterion Maximum Concentration (CMC) exceedances. The fact sheet also states the standard was compared against data collected at Los Angeles County MS4 San Gabriel River Monitoring Station (S14) for data collected from 1995 through April 2007. The Regional Board’s assessment correctly utilized dissolved metal results and calculated the CCC using concurrently collected hardness. However, an error was detected in the Regional Board’s CCC calculations provided in the fact sheet. Specifically, the four-day average dissolved lead was not evaluated against the four-day average CCC when two or more measurements were collected in a four-day period.

### *State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the use of dissolved and total fraction metals data, the use of wet and dry weather data, and the use of concurrent or average hardness values were all discussed. Dissolved fraction metals data should be used for assessing listings when available, and total fraction data may be used only for listing reevaluation when dissolved fraction data is unavailable:

“The CTR [California Toxic Rule] mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions.”<sup>16</sup>

Also, the State Board stated in this report that both wet and dry weather data must be used to assess listings unless the Basin Plan includes specific wet and dry weather water quality standards:

“Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant.”<sup>17</sup>

<sup>16</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

<sup>17</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments:107.19), September 2006.

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### *Fact Sheet Formula Error*

An error was found in Excel data file accompanying the 2008 listing fact sheet for San Gabriel River Reach 2 lead analysis. The formula in the Chronic Criteria data field is:

“=(EXP((1.23\*LN(I2)-4.705))\*(1.46203-LN(I2)\*0.145712))”

The CTR defines the CCC objective equation as:

“CCC = WER x (Acute Conversion Factor) x exp { $m_c \ln(\text{hardness}) + b_c$ }

where for lead:  $m_c = 1.273$ ,  $b_c = -4.705$ , WER = 1, and the Acute Conversion Factor (CF) is:

“CF =  $1.46203 - [(\ln \{\text{hardness}\})(0.145712)]$ ”

It appears the  $m_c$  value as 1.23 used in the Regional Board analysis is incorrect and should have been entered as 1.273.

### *Proposed Listing Reevaluation*

In accordance with the State Board's direction, when listings are assessed: all dry weather and wet weather data should be used; dissolved metals data should be used when available; total metals data may be used when dissolved metals data are not available for reevaluation of listings; concurrent hardness values should be used when available; and average hardness should be used when concurrent hardness is not available.

Using the concurrently measured hardness to evaluate the hardness-dependent CTR lead objectives, the chronic water quality objectives ranged from 2.0 to 11.5  $\mu\text{g/L}$  for dissolved lead. For the purposes of calculating the hardness-dependent CTR lead objectives, concurrently measured hardness was used when available and the average of all location hardness measurements collected were used when concurrent hardness was not available. To reevaluate the existing listing, total lead measurements collected and reported to the Regional Board by the Sanitation Districts of Los Angeles County (Sanitation Districts) in the San Gabriel River Reach 2 during approximately the same time period (1995 through April 2007) should be considered. A complete summary of the lead and hardness data, along with the CTR hardness-dependent objective calculations, can be found in Appendix L - Table L1. Although dissolved lead was not measured in the Sanitation Districts data set, it is conservative to estimate that 100% of the measured total lead was in the dissolved form as described by the September 2006 State Board comments mentioned above. With these conservative assumptions, and combining the Sanitation Districts' data with the MS4 data, no exceedances of the Criterion Maximum Concentration (CMC) for lead were observed and ten exceedances of the Criterion Continuous Concentration (CCC) for lead were observed out of sample size of 191. For a sample size from 188 to 199, using the binomial distribution formula associated with Table 4.1, the State's Listing Policy recommends delisting a pollutant/water body combination if the number of exceedances are equal to or less than sixteen. Therefore, lead in San Gabriel River Reach 2 should be delisted.

### *Dissolved Lead Only Reevaluation*

A reevaluation of only the 1995 through April 2007 dissolved lead data using the corrected CCC formula and appropriate four-day averages indicates that dissolved lead concentrations exceeded the four-day average CCC only four times with a sample size of 63. For a sample size from 60 to 71, Table 4.1 of the State's Listing Policy recommends delisting a pollutant/water body combination if the number of exceedances are equal to or less than five. This further demonstrates that lead in San Gabriel River Reach 2 should be delisted.

## ATTACHMENT 1

### Fact Sheet M

<b>Water Body:</b>	<b>Santa Clara River Reach 5 and 6</b>
<b>Pollutant:</b>	<b>Chlorodibromomethane</b>
<b>Listing:</b>	<b>List on the 303(d) List (TMDL required list)</b>
<b>Comment &amp; Recommendation:</b>	<b>Do Not List – Water Quality Objectives Being Achieved</b>

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing that new listings for chlorodibromomethane be made to the 303(d) list for Santa Clara River Reaches 5 and 6. The proposed listings are based on application of California Toxic Rule (CTR) criteria to protect human health with consumption of water and aquatic organisms. Use of the human health “water plus organisms” criteria instead of criteria for consumption of “organisms only” relied on the presence of a Municipal and Domestic Water Supply (MUN) beneficial use in the water body. However, Santa Clara River Reaches 5 and 6 do not have an MUN beneficial use, but rather only have a conditional potential MUN designation that has no legal effect. Therefore use of the “water plus organisms” CTR criteria was inappropriate and the “organisms only” criteria should instead be used to evaluate listings.

#### *Applicable Water Quality Objective*

Both Reaches 5 and 6 of the Santa Clara River are designated for existing Water Contact Recreation (REC-1) beneficial use. The CTR Human Health for consumption of organism only criteria (34 µg/L) should be used to determine whether of these reaches are impaired.

#### *Proposed Listing Reevaluation Santa Clara River Reach 5*

To reevaluate the listing compared to the California Toxics Rule Human Health for consumption of organism only criteria, chlorodibromomethane measurements collected and reported to the Regional Board by the Sanitation Districts of Los Angeles County (Sanitation Districts) as well as data from the Newhall Ranch Sanitation District (Newhall) in the Santa Clara River Reach 5 were used. A complete summary of the chlorodibromomethane data for Reach 5 can be found in Appendix M – Table M1. In Santa Clara River Reach 5, no exceedances of the organism only criteria were observed out of a sample size of 57. For a sample size from 48 to 59, Table 3.1 of the State’s listing policy recommends a pollutant/water body combination be listed if the number of exceedances are equal to or greater than five. Therefore, the proposed chlorodibromomethane listing in Santa Clara River Reach 5 should be rejected.

#### *Proposed Listing Reevaluation Santa Clara River Reach 6*

To reevaluate the listing compared to the California Toxics Rule Human Health for consumption of organism only criteria, chlorodibromomethane measurements collected and reported to the Regional Board by the Sanitation Districts in the Santa Clara River Reach 6 were used. A complete summary of the chlorodibromomethane data for Reach 6 can be found in Appendix M – Table M2. In Santa Clara River Reach 6, no exceedances of the organism only criteria were observed out of a sample size of 8. For a sample size from 2 to 24, Table 3.1 of the State’s listing policy recommends a pollutant/water body combination be listed if the number exceedances are equal to or greater than two. Therefore, the proposed chlorodibromomethane listing in Santa Clara River Reach 6 should be rejected.

# ATTACHMENT 1

## Fact Sheet N

**Water Body:** Santa Clara River Reach 5 and 6  
**Pollutant:** Dichlorobromomethane

**Listing:** List on the 303(d) List (TMDL required list)

**Comment & Recommendation:** Do Not List – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing that new listings for dichlorobromomethane be made to the 303(d) list Santa Clara River Reaches 5 and 6. The proposed listings are based on application of California Toxic Rule (CTR) criteria to protect human health with consumption of water and aquatic organisms. Use of the human health “water plus organisms” criteria instead of criteria for consumption of “organisms only” relied on the presence of a Municipal and Domestic Water Supply (MUN) beneficial use in the water body. However, Santa Clara River Reaches 5 and 6 do not have an MUN beneficial use, but rather only have a conditional potential MUN designation that has no legal effect. Therefore use of the “water plus organisms” CTR criteria was inappropriate and the “organisms only” criteria should instead be used to evaluate listings.

### *Applicable Water Quality Objective*

Both Reaches 5 and 6 of the Santa Clara River are designated with an existing Water Contact Recreation (REC-1) beneficial use. The CTR Human Health for consumption of organism only criteria (46 µg/L) should be used to determine whether these reaches are impaired.

### *Proposed Listing Reevaluation Santa Clara River Reach 5*

To reevaluate the listing compared to the California Toxics Rule Human Health for consumption of organism only criteria, dichlorobromomethane measurements collected and reported to the Regional Board by the Sanitation Districts of Los Angeles County (Sanitation Districts) as well as data from the Newhall Ranch Sanitation District (Newhall) in the Santa Clara River Reach 5 were used. A complete summary of the dichlorobromomethane data for Reach 5 can be found in Appendix N – Table N1. In Santa Clara River Reach 5, no exceedances of the organism only criteria were observed out of a sample size of 57. For a sample size from 48 to 59, Table 3.1 of the State’s listing policy recommends a pollutant/water body combination be listed if the number of exceedances are equal or greater than five. Therefore, the proposed dichlorobromomethane listing in Santa Clara River Reach 5 should be rejected.

### *Proposed Listing Reevaluation Santa Clara River Reach 6*

To reevaluate the listing compared to the California Toxics Rule Human Health for consumption of organism only criteria, dichlorobromomethane measurements collected and reported to the Regional Board by the Sanitation Districts in the Santa Clara River Reach 6 were used. A complete summary of the dichlorobromomethane data for Reach 6 can be found in Appendix N – Table N2. In Santa Clara River Reach 6, no exceedances of the organism only criteria were observed out of a sample size of 8. For a sample size from 2 to 24, Table 3.1 of the State’s listing policy recommends a pollutant/water body combination be listed if the number exceedances are equal or greater than two. Therefore, the proposed dichlorobromomethane listing in Santa Clara River Reach 6 should be rejected.

## ATTACHMENT 1

### Fact Sheet O

**Water Body:** San Jose Creek Reach 1  
**Pollutant:** Ammonia

**Listing:** Listed on the 303(d) List (Being Addressed by Actions Other than a TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

Site-specific objectives (SSOs) for ammonia were developed for San Jose Creek Reach 1 and became effective and adopted into the Basin Plan on April 23, 2009. However, these objectives were approved by the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) in 2007 and subsequently approved by the State Water Resources Control Board in January 2008. Considering that the Regional Board has been aware of these impending changes to the Basin Plan Regional Board since 2007, the chronic ammonia water quality standards reflected in the SSO should have been used to evaluate ammonia listings for this 303(d) listing cycle.

#### *Existing Listing Reevaluation*

An examination of the San Jose Creek Reach 1 ammonia, pH, and temperature data provided to the Regional Board as part of their 303(d) listing review (March 2004 through February 2007) reveals that the four-day chronic SSO-adjusted Criterion Continuous Concentration (CCC) threshold for ammonia was exceeded in San Jose Creek Reach 1 on 14 occasions out of a total 282 measurements, as presented in Appendix O - Table O1. Furthermore, there were no exceedances of the Criterion Maximum Concentration (CMC) threshold out of 296 single sample measurements. For a sample size of 282 to 292, using the binomial distribution formula associated with Table 4.1, the State's 303(d) listing policy recommends delisting a previously listed pollutant/water body combination if the number of exceedances are equal to or fewer than 24. Since 282 four-day average ammonia results show only 14 exceedances of the CCC, ammonia should be delisted from San Jose Creek Reach 1.

## ATTACHMENT 1

### FACT SHEET P

**Water Body:** Santa Clara River Reach 5  
**Pollutant:** Ammonia

**Listing:** Listed on the 303(d) List (Being Addressed by an EPA Approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

Santa Clara River Reach 5 has been included on the 303(d) list for ammonia since at least 1998. Subsequently, nitrification/denitrification treatment upgrades at the Valencia Water Reclamation Plant were completed in October 2003 that resulted in significant reductions of ammonia loadings to Santa Clara River Reach 5.

#### *Existing Listing Reevaluation*

An examination of the Santa Clara River Reach 5 ammonia, pH, and temperature data collected concurrently and provided to the California Regional Quality Control Board, Los Angeles Region after implementation of nitrification/denitrification treatment upgrades at the Valencia Water Reclamation Plant (October 2003 through February 2007) by the Sanitation District of Los Angeles County (Sanitation Districts) as well as available data from the same time period collected by Newhall Ranch Sanitation District (Newhall) reveals that even without consideration of recently approved site-specific objectives for ammonia, the four-day chronic Criterion Continuous Concentration (CCC) threshold for ammonia was never exceeded out of a total 146 measurements, as presented in Appendix P Table P1. For a sample size of 142 to 152, using the binomial distribution formula associated with Table 4.1, the State 303(d) Listing Policy recommends delisting a previously listed pollutant/water body combination if the number of exceedances are equal to or fewer than 12. Additionally, the single sample Criterion Maximum Concentration (CMC) was not exceeded out 218 samples collected. Since no exceedances of the water quality standards were observed in Santa Clara River Reach 5 out of 146 measurements, Santa Clara River Reach 5 should be delisted for ammonia.

## ATTACHMENT 1

### FACT SHEET Q

**Water Body:** Santa Clara River Reach 5  
**Pollutant:** Nitrite + Nitrate

**Listing:** Listed on the 303(d) List (Being Addressed by an EPA Approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

Table 3-8 of the Basin Plan indicates that the nitrogen water quality objective for Santa Clara River Reach 5 is 5.0 mg/L. This objective is further defined in the table by footnote “d” as the sum of nitrate and nitrite. The original listing determination for this water body/pollutant combination was made in 1998. Since that time, extensive water reclamation plant (WRP) upgrades were implemented by the Sanitation Districts of Los Angeles County’s (Sanitation Districts) Valencia WRP to specifically reduce nitrogen loadings into Santa Clara River Reach 5. The most significant of these upgrades included incorporation of nitrification/de-nitrification treatment beginning in October 2003.

#### *Existing Listing Reevaluation*

Nitrite and nitrate data for Santa Clara River Reach 5 provided to the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) as part of their 303(d) listing review (March 2004 through February 2007) by the Sanitation Districts (104 results) and the Newhall Ranch Sanitation District (139 results) were evaluated for similar time periods. The evaluation revealed that the nitrite + nitrate water quality objective was exceeded in nine instances out of a total 243 measurements, as presented in Appendix Q Table Q1. For a sample size of 235 to 246 the State’s 303(d) Listing Policy, using the binomial distribution formula associated with Table 4.1, recommends delisting a previously listed pollutant/water body combination if the number of exceedances are equal to or fewer than 20. Since only nine exceedances of the objective were observed, Santa Clara River Reach 5 should be delisted for nitrite + nitrate.

## ATTACHMENT 1

### FACT SHEET R

**Water Body:** Santa Clara River Reach 6  
**Pollutant:** Ammonia

**Listing:** Listed on the 303(d) List (Being Addressed by an EPA Approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

Santa Clara River Reach 6 has been included on the 303(d) list for ammonia since at least 1998. Subsequently, nitrification/denitrification treatment upgrades at the Saugus Water Reclamation Plant were completed in October 2003 that resulted in significant reductions of ammonia loadings to Santa Clara River Reach 6.

#### *Existing Listing Reevaluation*

An examination of the Santa Clara River Reach 6 ammonia, pH, and temperature data collected concurrently and provided to the Regional Board after implementation of nitrification/denitrification treatment upgrades at the Saugus Water Reclamation Plant (October 2003 through February 2007) by the Sanitation District of Los Angeles County (Sanitation Districts) reveals that even without consideration of recently approved site-specific objectives for ammonia, the four-day chronic Criterion Continuous Concentration (CCC) threshold for ammonia was exceeded twice in a sample size of 73, as presented in Appendix R Table R1. For a sample size of 72 to 82, Table 4.1 of the State 303(d) Listing Policy recommends delisting a previously listed pollutant/water body combination if the number of exceedances are equal to or fewer than six. Additionally, the single sample Criterion Maximum Concentration (CMC) was not exceeded out 78 samples collected. Since only two exceedances of the water quality standards were observed in Santa Clara River Reach 6 out of 74 measurements, Santa Clara River Reach 6 should be delisted for ammonia.

## ATTACHMENT 1

### FACT SHEET S

**Water Body:** Santa Clara River Reach 5  
**Pollutant:** Polychlorinated Biphenyls (PCBs)

**Listing:** List on the 303(d) List (TMDL required list)

**Comment & Recommendation:** Do Not List – Insufficient Basis to List

The California Regional Water Quality Control Board, Los Angeles (Regional Board) is proposing a new listing for polychlorinated biphenyls (PCBs) in Reach 5 of the Santa Clara River because their evaluation of available data indicated that the California Toxics Rule (CTR) four-day Criterion Continuous Concentration (CCC) threshold of 0.014 µg/L PCB was exceeded in 2 of 3 samples collected as part of Surface Water Ambient Monitoring Program (SWAMP). A contemporary analysis of available data finds 3 samples available from the SWAMP program, 46 samples collected by the Newhall Sanitation District (Newhall), and 18 samples collected by the Sanitation Districts of Los Angeles County (Sanitation Districts). This dataset is attached as Appendix S – Table S1.

#### *Consideration of all data*

All Sanitation Districts and Newhall data for PCBs for this period are non-detect; however the detection limits are above the applicable water quality criterion of 0.014 µg/L PCBs so the samples do not qualify for consideration under the State's 303(d) Listing Policy. However, if all samples were considered this would yield an additional 64 non-detect samples. For a sample size of 60 to 71, Table 3.1 of the State's listing policy recommends listing a pollutant/water body combination if the number of exceedances are equal to or greater than six.

#### *Spatial Representation*

The SWAMP sample collected from the Castaic Creek monitoring location on November 13, 2001 is not representative of conditions in Santa Clara River Reach 5 and does not meet Listing Policy guidelines for spatial representativeness. The SWAMP database for this sample states in the comments field, "slow trickle, not measurable flow, small pools of water." The proposed PCBs listing relies on this Castaic Creek SWAMP monitoring station sample, which was collected during non-measurable flows that are not representative of typical or long-term conditions within this water body and certainly not representative of typical or long-term conditions in Santa Clara River Reach 5.

Further, the SWAMP sample was collected from Castaic Creek but Table 2-1 of the Basin Plan identifies Castaic Creek as a separate water body with designated beneficial uses that are independent of Santa Clara River Reach 5. Therefore the Castaic Creek sample does not meet the requirements of Section 6.1.5.2 of the State's 303(d) Listing Policy and is not representative of the water body segment of the Santa Clara River Reach 5. PCB data for Castaic Creek should be evaluated separately and should not be included in the primary data set considered in determining a listing for Santa Clara River Reach 5.

#### *Temporal Representation*

The SWAMP samples were taken only 14 days apart during a single season (wet season) in 2001. This does not meet the recommended criteria for temporal representation in the Listing Policy, and therefore should not be used as the sole basis for this new listing. Section 6.1.5.3 of the Listing Policy states, "In general, samples should be available from two or more seasons or from two or more events when effects

## ATTACHMENT 1

or water quality exceedances would be expected to be clearly manifested." Therefore, the Sanitation Districts do not believe that sufficient information is available at this time to warrant placing Santa Clara River Reach 5 on the 303(d) list for PCBs. The information available does not meet the minimum number of exceedances required for listing per Table 3.1 of the State's 303(d) Listing Policy.

### *State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) considered a listing for Santa Clara River Reach 5 based on this SWAMP data and determined no listing was justified. The updated November 2006 fact sheet is included as Appendix S1. The State Board recommendation on this fact sheet is:

"After review of the available data and information, SWRCB staff concludes that the water body-pollutant combination should not be placed on the section 303(d) list because applicable water quality standards are not exceeded"

### *Proposed Listing Reevaluation*

Only the Santa Clara River Reach 5 SWAMP data collected at the Newhall Ranch Blue Cut monitoring station should only be used to assess impairments, not the Castaic Creek sample. This results in only 1 of 2 samples exceeding the CCC. Available Santa Clara River Reach 5 data do not meet the Listing Policy requirements of Table 3.1 for two or greater exceedances for any new listing, so no new listing is warranted for PCBs in Santa Clara River Reach 5.

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### FACT SHEET T

**Water Body:** Santa Clara River Reach 5  
**Pollutant:** DDT

**Listing:** List on the 303(d) List (TMDL required list)

**Comment & Recommendation:** Do Not List – Insufficient Basis to List

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is proposing a new listing for DDT in Reach 5 of the Santa Clara River because their evaluation of available data indicated that the California Toxic Rule (CTR) criteria to protect human health with consumption of water and aquatic organisms threshold of 0.00059 µg/L DDT was exceeded in 2 of 3 samples collected as part of the Surface Water Ambient Monitoring Program (SWAMP). A contemporary analysis of available data finds 3 samples available from the SWAMP program, 60 samples collected by the Newhall Sanitation District (Newhall), and 40 samples collected by the Sanitation Districts of Los Angeles County (Sanitation Districts). This dataset is attached as Appendix T – Table T1.

#### *Consideration of all data*

All Sanitation Districts and Newhall data for DDT for this period are non-detect; however the detection limits are above the applicable water quality criterion of 0.00059 µg/L DDT so the samples do not qualify for consideration under the State's 303(d) Listing Policy. However, if all samples were considered this would yield an additional 100 non-detect samples. For a sample size of 95 to 106, Table 3.1 of the State's listing policy recommends listing a pollutant/water body combination if the number of exceedances are equal to or greater than ten.

#### *Spatial Representation*

The SWAMP sample collected from the Castaic Creek monitoring location on November 13, 2001 is not representative of conditions in Santa Clara River Reach 5 and does not meet Listing Policy guidelines for spatial representativeness. The SWAMP database for this sample states in the comment field, "slow trickle, not measurable flow, small pools of water." The proposed DDT listing relies on this Castaic Creek SWAMP monitoring station sample, which was collected during non-measurable flows that are not representative of typical or long-term conditions within this water body and Certainly not representative of typical or long-term conditions in Santa Clara River Reach 5.

Further, the SWAMP sample was collected from Castaic Creek but Table 2-1 of the Basin Plan identifies Castaic Creek as a separate water body with designated beneficial uses that are independent of Santa Clara River Reach 5. Therefore the Castaic Creek sample does not meet the requirements of Section 6.1.5.2 of the State's 303(d) Listing Policy and is not representative of the water body segment of the Santa Clara River Reach 5. DDT data for Castaic Creek should be evaluated separately and should not be included in the primary data set considered in determining a listing for Santa Clara River Reach 5.

#### *Temporal Representation*

The SWAMP samples were taken only 14 days apart during a single season (wet season) in 2001. This does not meet the recommended criteria for temporal representation in the Listing Policy, and therefore should not be used as the sole basis for this new listing. Section 6.1.5.3 of the Listing Policy states, "In general, samples should be available from two or more seasons or from two or more events when effects

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or water quality exceedances would be expected to be clearly manifested." Therefore, the Sanitation Districts do not believe that sufficient information is available at this time to warrant placing Santa Clara River Reach 5 on the 303(d) list for DDT. The information available does not meet the minimum number of exceedances required for listing per Table 3.1 of the State's 303(d) Listing Policy.

### *State Water Resource Control Board Guidance*

In September 2006, State Water Resources Control Board (State Board) considered a similar listing for Santa Clara River Reach 5 for PCB based on this SWAMP data. The State Board determined that only data from the Newhall Ranch Blue Cut monitoring station was suitable for evaluation in Santa Clara Reach 5, as reflected in the fact sheet included as Appendix S1. The State Board rejected use of the Castaic Creek SWAMP sample in assessing impairments in Santa Clara Reach 5.

### *Proposed Listing Reevaluation*

Santa Clara River Reach 5 SWAMP data collected at the Newhall Ranch Blue Cut monitoring station should only be used to assess impairment not the Castaic Creek sample. This results in only 1 of 1 samples exceeding the water quality standard. Available Santa Clara River Reach 5 data do not meet the Listing Policy requirements of Table 3.1 for two or greater exceedances for any new listing, so no new listing is warranted for DDT in Santa Clara River Reach 5.

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### FACT SHEET U

**Water Body:** Santa Clara River Reach 6  
**Pollutant:** Bis(2-ethylhexyl)phthalate (diethylhexyl phthalate or DEHP)  
**Listing:** List on the 303(d) List (TMDL required list)  
**Comment & Recommendation:** Do Not List – Water Quality Basis is Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is proposing a new listing for bis(2-ethylhexyl)phthalate (DEHP) in Reach 6 of the Santa Clara River. The proposed listing is based on application of a California Toxics Rule (CTR) criterion to protect human health with consumption of water and aquatic organisms. Use of the human health “water plus organisms” criterion instead of the criterion for consumption of “organisms only” relied on the presence of a Municipal and Domestic Water Supply (MUN) beneficial use in the water body. However, Santa Clara River Reach 6 does not have an MUN beneficial use, but rather only has a conditional potential MUN designation that has no legal effect. Therefore use of the “water plus organisms” CTR criteria was inappropriate and the “organisms only” criteria should instead be used to evaluate listings. Additionally, a contemporary analysis of available data finds 33 samples collected by the Los Angeles County Department of Public Works (LACDPW) and 13 samples collected by the Sanitation Districts of Los Angeles County (Sanitation Districts). This dataset is attached as Appendix U – Table U1.

#### *Applicable Water Quality Objective*

Reach 6 of the Santa Clara River is designated with an existing Water Contact Recreation (REC-1) beneficial use. The CTR Human Health for consumption of organism only criteria (5.9 µg/L) should be used to determine whether these reaches are impaired.

#### *Sample Contamination and Data Quality Assessment*

Phthalates are commonly encountered analytical contaminants. They are found in rubber gloves, plastic tubing, and nearly every plastic material. Therefore, phthalate contamination is a frequent laboratory interference and stringent procedures along with specialized sampling equipment are necessary to minimize this interference. EPA Method 625 for organic chemical analysis of municipal and industrial wastewater cautions that composite sampling equipment, particularly the use of Tygon tubing, is a significant source of phthalate contamination<sup>18</sup>. Furthermore, Standard Methods 6410 B specifically recommends using sampling equipment “as free as possible” of any plastic tubing and includes specific recommendations for minimizing contamination from peristaltic pump tubing<sup>19</sup>.

A review of LACDPW’s sampling data from 2001 to 2008 indicates that a significant sample contamination issue existed during the 2003-2004 sampling season. Between 2001 and 2008 LACDPW sampled 13 locations each year 5 to 7 times for DEHP. Table U1 lists the number times DEHP was detected at all sampling locations.

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<sup>18</sup> Appendix A to Part 136 – Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater, Method 625 Base/Neutrals and Acids. Section 9 – Sample Collection, Preservation, and Handling. Accessed from Accustandards.com, EPA downloads

<sup>19</sup> Standard Methods for the Examination of Water and Wastewater, 21<sup>st</sup> Edition. Method 6410 B. Liquid-Liquid Extraction Gas Chromatographic/Mass Spectrometric Method. Page 6-66 and 6-67.

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**TABLE U1  
LACDPW SAMPLING SEASON DETECTIONS OF DEHP**

Season	Detections	Samples
2002-2003	0	72
2003-2004	57	72
2004-2005	10	84
2005-2006	0	84
2006-2007	0	84
2007-2008	0	86

The fact that DEHP was not detected a single time during the 2002-2003, 2005-2006-2007, 2006-2007, or 2007-2008 sampling seasons but was detected in 79% of samples during the 2003-2004 strongly indicates that these detections were the result of collection, handling, or analysis contamination. LACDPW was contacted regarding this data anomaly and commented that around the 2004 time frame a significant change was made in the equipment they used to collect samples. At that time, the practice of using “rubber buckets” was discontinued and LACDPW started using sterilized laboratory grade sampling equipment. Around this time, analytical laboratories across the California were making changes to address DEHP sample contamination. This includes the Sanitation Districts analytical laboratories, which switched from Tygon tubing to Teflon tubing for composite sampling and switched to phthalate-free gloves for handling phthalate samples. After the Sanitation Districts made these changes, dramatic reductions were seen in concentrations of DEHP detected during sampling.

Furthermore, it is highly unlikely that Santa Clara River Reach 6 contained excessive concentrations of DEHP for one or two years but in no other years, particularly as result of stormwater discharges. There are no known significant sources of DEHP in stormwater. Due to issue of sample contamination, particularly through use of plastic buckets to collect samples prior to the 2005-2006 sampling season, a weight of evidence evaluation indicates that the LACDPW results for DEHP prior to the 2005-2006 sampling season do not meet the data quality requirements of Section 6.1.4 of the State’s 303(d) Listing Policy. In particular, this Section states, “the quality of the data used in the development of the section 303(d) list shall be of sufficient high quality to make determinations of water quality standards attainment.” Additionally, Section 6.1.5.2 of the State’s 303(d) Listing Policy states that if implementation of a management practice has resulted in a change in water body segment, only data collected since the management practice was implemented should be used. In this case, use of cleaner sampling methods should be considered a management practice and older data should be discarded.

### *Proposed Listing Reevaluation*

Consideration of all data collected from July 2005 to July 2008 provides three years of data or 27 samples with no exceedances. The Santa Clara River Reach 6 DEHP data do not meet the Listing Policy requirements of Table 3.1 for two or greater exceedances for any new listing, so no new listing is warranted for bis(2-ethylhexyl)phthalate (DEHP) in Santa Clara River Reach 6.

## ATTACHMENT 1

### FACT SHEET V

**Water Body:** Walnut Creek  
**Pollutant:** Copper

**Listing:** List on the 303(d) List (TMDL required list)

**Comment & Recommendation:** Do Not List – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing that a new listing for copper be made to the 303(d) list in Walnut Creek. The fact sheet for copper in Walnut Creek states three of seven samples “exceeded the CTR freshwater criteria (chronic) and this exceeds the allowable frequency listed in Table 3.1 of the Listing Policy”. The fact sheet also states the standard was compared against data collected by the Los Angeles County Department of Public Works (LACDPW) from October 2006 through April 2007.

#### *State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the use of dissolved and total fraction metals data, the use of wet and dry weather data, and the use of concurrent or average hardness values were all discussed. Dissolved fraction metals data should be used for assessing listings when available, and total fraction data may be used only for listing reevaluation when dissolved fraction data is unavailable:

“The CTR mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions.”<sup>20</sup>

Also, the State Board stated in this report that both wet and dry weather data must be used to assess listings unless the Basin Plan includes specific wet and dry weather water quality standards:

“Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant.”<sup>21</sup>

<sup>20</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

<sup>21</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments:107.19), September 2006.

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Finally, the State Board provided the following guidance on the appropriate hardness to use for listing assessment:

“Revisions were made to fact sheets in order to clarify how the hardness based criteria was calculated. In almost all cases, the criteria was calculated for each individual sample using the hardness value for that sample. However, there were a few instances where only the average hardness data was available and used. In cases where the average value was used, recommendations were to not list so using this average value did not result in any new listings.”<sup>22</sup>

### *Proposed Listing Reevaluation*

In accordance with the State Board’s direction, when listings are assessed: all dry weather and wet weather data should be used; dissolved metals data should be used when available; total metals data may be used when dissolved metals data are not available for reevaluation of listings; concurrent hardness values should be used when available; and average hardness should be used when concurrent hardness is not available.

For the purposes of calculating the hardness dependent CTR copper objectives, concurrently measured hardness was used. Using the concurrently measured hardness to evaluate the hardness-dependent CTR copper objectives, the chronic water quality objectives ranged from 5.8 to 14.8 µg/L for dissolved copper. A reevaluation of the data indicate that only one of six four-day average dissolved copper results exceeded the Criterion Continuous Concentration (CCC) and only one of seven results exceeded the Criterion Maximum Concentration (CMC). Table 3.1 of the State’s listing policy recommends a pollutant/water body combination be listed if the number exceedances are equal or greater than two with a sample size of 2 to 24. Therefore, the proposed copper listing in Walnut Creek should be rejected. A complete summary of the copper and hardness data along with the CTR hardness dependant objective calculations can be found in Appendix V - Table V1.

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<sup>22</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 171 (Comments:81.3), September 2006.

## ATTACHMENT 1

### FACT SHEET W

**Water Body:** Santa Clara Estuary  
**Pollutant:** Arsenic

**Listing:** List on the 303(d) List (TMDL Required List)

**Comment & Recommendation:** Do Not List – Water Quality Objective Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing to add arsenic to the 2008 303(d) List for the Santa Clara Estuary. The fact sheet for arsenic in Santa Clara Estuary states “9 of 63 samples exceed the California Toxics Rule Criterion Maximum Concentration (CMC)” and the California Toxics Rule (CTR) lists a Criterion Continuous Concentration of 36 µg/L and a Criterion Maximum Concentration (CMC) of 59 µg/L for arsenic to protect aquatic life in saltwater.

#### *Proposed Listing Reevaluation*

An analysis of available data finds 63 samples collected by the City of Buenaventura. The evaluation reveals that the arsenic water quality objective was exceeded only twice out of the 63 measurements, as presented in Appendix W Table W1. For a sample size of 60 to 71, Table 3.1 of the State’s 303(d) listing policy recommend a pollutant/water body combination be listed if the number of exceedances are equal or greater than six. Therefore, the proposed arsenic listing in the Santa Clara Estuary should be rejected.

# ATTACHMENT 1

## Fact Sheet X

**Water Body:** Walnut Creek  
**Pollutant:** Lead  
**Listing:** List on the 303(d) List (TMDL Required List)  
**Comment & Recommendation:** Do Not List – Water Quality Objective Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing to list lead in Walnut Creek. The fact sheet for lead in Walnut Creek states that “the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded” and further indicates that two of six samples exceeded the hardness dependent California Toxics Rule (CTR) Criterion Continuous Concentration (CCC) for lead with no Criterion Maximum Concentration (CMC) exceedances. The fact sheet also states the standard was compared against data collected by the Los Angeles County Department of Public Works from October 2006 through April 2007.

### *State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the use of dissolved and total fraction metals data, the use of wet and dry weather data, and the use of concurrent or average hardness values were all discussed. Dissolved fraction metals data should be used for assessing listings when available, and total fraction data may be used only for listing reevaluation when dissolved fraction data is unavailable:

“The CTR [California Toxic Rule] mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions.”<sup>23</sup>

Also, the State Board stated in this report that both wet and dry weather data must be used to assess listings unless the Basin Plan includes specific wet and dry weather water quality standards:

“Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant.”<sup>24</sup>

<sup>23</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

<sup>24</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments:107.19), September 2006.

## ATTACHMENT 1

### *Proposed Listing Reevaluation*

In accordance with the State Board's direction, when listings are assessed: all dry weather and wet weather data should be used; dissolved metals data should be used when available; total metals data may be used when dissolved metals data are not available for only reevaluation of listings; concurrent hardness values should be used when available; and average hardness should be used when concurrent hardness is not available.

For the purposes of calculating the hardness dependent CTR lead objectives, concurrently measured hardness was used. Using the concurrently measured hardness to evaluate the hardness-dependent CTR lead objectives, the CCC water quality objectives ranged from 1.4 to 4.7  $\mu\text{g/L}$  for dissolved lead and the practical quantitation limit (PQL) stated by LACDPW is 5.00  $\mu\text{g/L}$ . A reevaluation of the data from October 2006 through April 2007 indicates that the PQL was above the CCC for all samples, so no samples meet the requirements of section 6.1.5.5 of the State's Listing Policy for consideration against the CCC. The CMC water quality objectives ranged from 36.9  $\mu\text{g/L}$  to 121.7  $\mu\text{g/L}$  for dissolved lead. A reevaluation of the data from October 2006 through April 2007 indicates that no exceedances of the CMC occurred with a sample size of 7. Table 3.1 of the State's listing policy recommends a pollutant/water body combination be listed if the number exceedances are equal or greater than two with a sample size of 2 to 24. Therefore, the proposed lead listing in Walnut Creek should be rejected. A complete summary of the lead and hardness data along with the CTR hardness dependant objective calculations can be found in Appendix X - Table X1.