

USS-POSCO INDUSTRIES



P.O. Box 471  
Pittsburg, California 94565

May 6, 2011

Vince Christian  
CA Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

Subject: Tentative Order Comments

Reference: NPDES CA0005002

Vince,

USS-POSCO Industries' (UPI) submits the following comments for your consideration related to the Tentative Order for our facility recently released for public comment:

UPI request reconsideration of a WQBEL for aldrin based on a single unqualified sample result. This is obviously a laboratory false positive, since aldrin was banned in the 1970s and is not a chemical present or used in any processes at the facility.

UPI request reconsideration of a WQBEL for cadmium based on one value (1.2 ug/l) that exceeded the Lowest Criteria (C = 1.17 ug/l), which is a statistical outlier and likely a laboratory error. No other values were above C, and the next highest reported value was 0.42 ug/l. All other values in the 57 RPA sampleset analyzed were lower or ND (93%). Recent effluent data is consistently ND at <0.1 ug/l. There is also a significance issue when comparing the MEC to a C limit with more significant characters, which would round to 1.2 ug/l.

UPI requests reconsideration of a WQBEL for Dioxin-TEQ based on a single quantified sample result, which is believed to be another laboratory false positive, since dioxin is not a chemical present or used in any processes at the facility.

Jeff Miller, PhD, DABT, President, Aqua-Science comments on UPI's behalf: "In reviewing your tentative NPDES Permit, I noticed the requirement to conduct your chronic toxicity tests using *"Dilution series 100%, 62.50%, 31.25%, 15.62%, 7.81%, 3.91 %, where %" is percent effluent as discharged, or as otherwise approved the Executive Officer*". In our 30 years of experience in conducting chronic toxicity tests, I have never previously seen this requirement. In fact, this dilution series is not in agreement with USEPA recommendations (Method Guidance and Recommendations for Whole Effluent Toxicity (WET) Testing (USEPA 821-B-00-004, 2000 pp.5-1-3). The USEPA document recommends a 0.5 dilution factor e.g. 100, 50, 25, 12.5 and 6.25% effluent. This dilution factor would be appropriate for your toxicity tests since your chronic toxicity limit of 4 TUc (25%) is in the middle of this dilution series. I know of no justification for using the dilution factor stated in your tentative permit." UPI requests use of 100, 50, 25, 12.5 and 6.25% effluent dilution series for chronic toxicity testing.

If you have any questions or comments, please call Dave Allen at (925) 439-6290.

Sincerely,

A handwritten signature in black ink, appearing to read "David R. Allen".

David R. Allen  
Group Manager - Environmental