

Hi Gen,

The meeting with Adam and yourself last week was very productive, so thank you for making time and considering our thoughts on the tentative modifications to the Port's NPDES Permit. In order to clarify the comments and requests the Port issued on the preliminary draft resolution and permit, we were asked to provide feedback on a few issues. Those issues are outlined below and any necessary changes to Permit language (3 changes, total) are called out (red underline/strike-through font). Supporting laboratory documentation is also attached.

Dry Weather Monitoring

RBI has discussed the dry weather monitoring issue with Port staff. In order to remain consistent with the original intent of the Permit, the Port's Sampling and Analysis Plan (attached to the SWMP), and the Port's current sampling practices, dry weather monitoring needs to be consistently defined in the Permit as occurring during the dry season. In response to Adam's request, we are confirming that the Port had indicated in the Port's comment package on the Preliminary Draft Resolution and Permit, the need to add additional, clarifying language to footnote 6 (MRP, p. 10) and this need still exists.

Permittee Comment (8/19/14) #1a

Change 1. The language in footnote 6 would be modified as follows:

"⁶ Dry weather monitoring events shall be preceded by at least seven days of no rainfall; the two dry weather monitoring events shall be separated by at least 14 days of no rainfall. Dry weather monitoring events shall occur in the dry season (June 1 through September 30)."

Change 2.

Permittee Comment (8/19/14) #1b

Additionally, the "dry season" terminology in the Fact Sheet's discussion of urban discharge and receiving water monitoring (p. 39, item A; p. 40, item B) should be retained.

Permittee Comment (8/19/2014) #2

Non-priority pollutant MLs

The Port would like to clarify that modifying the language of MRP p. 28, item 4 would suffice if Table G MLs were not removed for non-priority pollutants. The language below requires the Port to provide proper laboratory justification for ML changes, while giving them the flexibility to modify MLs were a change of labs (and thus associated MLs) to occur during the midst of the wet season when the frequency of sampling events is dictated by weather. Further, flexibility in submitting supporting documentation for estimated limits of detection (ELOD) for pyrethroids is necessary because methods to measure pyrethroids in water are not standardized across laboratories and the actual ELOD achieved in a given analysis will vary depending on instrument sensitivity and matrix effects.

Change 3.

4. For Table G pollutants, ~~priority toxic pollutants,~~ if the Permittee can demonstrate that a particular ML or ELOD is not attainable, in accordance with procedures set forth in 40 CFR 136, the lowest quantifiable concentration of the lowest calibration standard analyzed by a specific analytical procedure (assuming that all the method specified sample weights, volumes, and processing steps have been followed) may be used instead of the ML listed in Appendix 4 of the SIP or

Table G. The Permittee must submit documentation from the laboratory to the Central Valley Water Board Executive Officer to provide justification for approval prior to raising using an alternative the ML or ELOD for any constituent. Justification for using an alternative ML should be based on the lowest calibration standard available by the available laboratory(ies) for the analytical procedures specified for constituents listed in the SIP or Table G. Justification for using an alternative ELOD should describe the procedure used by the available laboratory(ies) to determine the ELOD and the reason that the Table G ELOD could not be attained using the procedure.

If the requested changes associated with MLs and ELODs specified above are not granted at this time, the Port requests that MLs for certain non-priority pollutants and the ELODs for certain pyrethroids be changed to the MLs and ELODs requested below. The requested MLs or ELODs are supported by accompanying laboratory documentation from Alpha Analytical Laboratories (Alpha) and Caltest Analytical Laboratories (Caltest). The requested ML for non-priority pollutants is equivalent to the higher of the RLs quoted by Caltest or Alpha, while the requested ELODs for pyrethroids are equivalent to the MDLs specified by Caltest.

CONSTITUENT	NPDES Permit Table G MLs (mg/L)	Requested ML (mg/L)
Total Suspended Solids	2	3
Total Dissolved Solids	2	10
Volatile Suspended Solids	2	3
Biochemical Oxygen Demand	2	5
Total Kjeldahl Nitrogen	0.1	1
Alkalinity	2	10
Total Ammonia-Nitrogen	0.1	0.5
Nitrate-Nitrite as N	0.1	0.2
Total Phosphorus	0.05	0.1
Total Hardness	2	5
Fluoride	0.1	1
Specific Conductance	1 µmhos/cm	20 µmhos/cm

Permittee Comment (8/19/2014) #3

Pyrethroid Pesticides	NPDES Permit Table G ELOD (ng/L)	Requested ELOD (mg/L)
Bifenthrin	0.10	0.2
Deltamethrin/Tralomethrin	0.15	0.6
Esfenvalerate/Fenvalerate	0.05	0.2
Fenpropathrin	0.50	0.2
Permethrin	1.0	5.0

SSO Language

Permittee Comment (8/19/2014) #4

Understanding the RWQCB's concerns, the Port withdraws its request for modifications to the Permit pertaining to the language regarding Sanitary Sewer Overflow and Spill Response (Permit p. 47, item b.i).

Thank you and please let us know if you have any questions.

-Paul

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Alpha Analytical Laboratories Inc.

www.alpha-labs.com

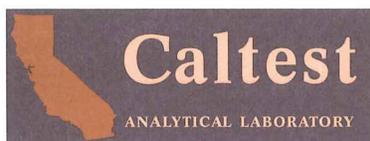
WATERS, SEDIMENTS, SOLIDS

Central Valley	Corporate	Bay Area
9090 Union Park Way, #113, Elk Grove 916-686-5190 F) 916-686-5192	208 Mason Street, Ukiah 707-468-0401 F) 707-468-5267	6398 Dougherty Road, #35, Dublin 925-828-6226 F) 925-828-6309

Quote#

140818rp-1

Client/Prospect:	Analyses	Method	Reporting Limit	Quantity	Subtotal	Total
RBI Attn: Paul Bedore	TPH - Diesel/Motor Oil	8015	50ug/l / 100ug/l	1	45	\$45.00
	TPH - Gasoline	8260	50ug/l	1	35	\$35.00
	TSS	SM2540D	1mg/l	1	15	\$15.00
	TDS	SM2540C	10mg/l	1	15	\$15.00
Project Name: WQCB	VSS	160.4	1mg/l	1	15	\$15.00
	TOC	SM5310C	1mg/l	1	20	\$20.00
	DOC	SM5310C	1mg/l	1	25	\$25.00
	BOD	SM5210B	5mg/l	1	25	\$25.00
	COD	SM5220D	50mg/l	1	20	\$20.00
Rush Surcharge Schedule: 2 day - 75% 3 day - 50% 4 day - 35% 5 day - 25% 6 day - 20% 7 day - 15% 8 day - 10% 9 day - 5%	TKN	SM4500	1mg/l	1	30	\$30.00
	Alkalinity	SM2320B	5mg/l	1	10	\$10.00
	Ammonia as Nitrogen	SM4500	0.5mg/l	1	20	\$20.00
	Nitrate as Nitrogen	300	0.2mg/l	1	15	\$15.00
	Nitrite as Nitrogen	300	0.2mg/l	1	15	\$15.00
	Dissolved Phosphorus	SM4500	0.04mg/l	1	25	\$25.00
	Total Phosphorus	SM4500	0.1mg/l	1	20	\$20.00
	Hardness	SM2340B	5mg/l	1	25	\$25.00
	MBAS	SM5540C	0.05mg/l	1	30	\$30.00
Quote Valid Until:	Chloride	300	0.5mg/l	1	15	\$15.00
	Fluoride	300	0.1mg/l	1	15	\$15.00
	MTBE	8260	0.5ug/l	1	35	\$35.00
	Perchlorate	314	4.0ug/l	1	35	\$35.00
	Turbidity	SM2130B	0.1mg/l	1	10	\$10.00
	Conductance	SM2510B	20umhos/cm	1	5	\$5.00
8/18/15	By Robbie Phillips / Robbie@alpha-labs.com			Total:	\$520.00	



ENVIRONMENTAL ANALYSES

Paul D. Bedore
Robertson-Bryan, Inc.
9888 Kent St.
Elk Grove, CA 95624

DATE: 8/18/2014

QUOTE

<u>CONSTITUENTS</u>	<u>METHOD</u>	<u>RL</u>	<u>UNITS</u>	<u>COST/SAMPLE</u>
Total Petroleum Hydrocarbons	EPA 8015	50	mg/L	\$ 245.00 *
Total Suspended Solids	SM2540D	3	mg/L	\$ 32.00
Total Dissolved Solids	SM2540C	10	mg/L	\$ 32.00
Volatile Suspended Solids	SM2540E	3	mg/L	\$ 32.00
Total Organic Carbon	SM5310B	1	mg/L	\$ 73.00
Dissolved Organic Carbon	SM5310B	1	mg/L	\$ 98.00 **
Biochemical Oxygen Demand	SM5210B	5	mg/L	\$ 55.00
Chemical Oxygen Demand	EPA 410.4	50	mg/L	\$ 44.00
Total Kjeldahl Nitrogen	SM4500-NH3 C	0.1	mg/L	\$ 63.00
Alkalinity	SM2320B	10	mg/L	\$ 32.00
Total Ammonia-Nitrogen	SM4500-NH3 C	0.1	mg/L	\$ 39.00
Nitrate-Nitrite as N	EPA 353.2	0.1	mg/L	\$ 39.00
Dissolved Phosphorus	SM4500PE	0.01	mg/L	\$ 76.00 **
Total Phosphorus	SM4500PE	0.01	mg/L	\$ 51.00
Total Hardness	SM2340C	5	mg/L	\$ 32.00
MBAS	SM5540C	0.1	mg/L	\$ 90.00
Chloride	EPA 300	1	mg/L	\$ 39.00
Fluoride	EPA 300	1	mg/L	\$ 39.00
Methyl tertiary butyl ether (MTBE)	EPA 624	0.5	ug/L	\$ 130.00
Perchlorate	EPA 314	0.004	mg/L	\$ 110.00
Turbidity	EPA 180.1	0.05	NTU	\$ 26.00
Specific Conductance	EPA 120.1	10	umhos/cm	\$ 29.00

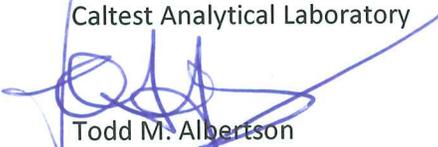
*Includes TPH as Gas (Purgeable) and TPH as Diesel (Extractable)

** Includes lab filtration fee

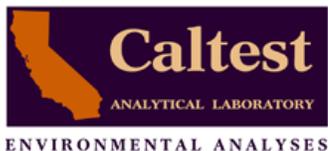
Total \$ 1,406.00

Sincerely,

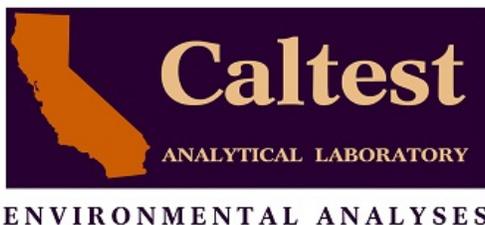
Caltest Analytical Laboratory


Todd M. Albertson
Vice President





888.258.8378

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Pyrethroids by GCMS-NCI-SIM

updated February 2011

Waters

Analyte	RL	MDL	Units
Allethrin	1.5	0.2	ng/L
Bifenthrin	1.5	0.2	ng/L
Cyfluthrin	1.5	0.2	ng/L
Lambda-Cyhalothrin	1.5	0.2	ng/L
Cypermethrin	1.5	0.2	ng/L
Deltamethrin:Tralomethrin	3	0.6	ng/L
Esfenvalerate:Fenvalerate	1.5	0.2	ng/L
Fenpropathrin	1.5	0.2	ng/L
Tau-Fluvalinate	1.5	0.2	ng/L
Permethrin	15	5	ng/L
Tetramethrin	1.5	0.3	ng/L

Optional compounds

Analyte	RL	MDL	Units
Chlorpyrifos	2	0.7	ng/L
Diazinon	1.5	0.3	ng/L

Sediments

Analyte	RL*	MDL	Units
Allethrin	0.33	0.05	ug/kg(ng/g)
Bifenthrin	0.33	0.1	ug/kg(ng/g)
Cyfluthrin	0.33	0.11	ug/kg(ng/g)
Lambda-Cyhalothrin	0.33	0.06	ug/kg(ng/g)
Cypermethrin	0.33	0.1	ug/kg(ng/g)
Deltamethrin:Tralomethrin	0.33	0.12	ug/kg(ng/g)
Esfenvalerate:Fenvalerate	0.33	0.13	ug/kg(ng/g)
Fenpropathrin	0.33	0.07	ug/kg(ng/g)
Tau-Fluvalinate	0.33	0.04	ug/kg(ng/g)
Permethrin	0.33	0.11	ug/kg(ng/g)
Tetramethrin	0.33	0.06	ug/kg(ng/g)

Optional compounds

Analyte	RL*	MDL	Units
Chlorpyrifos	0.33	0.12	ug/kg(ng/g)
Diazinon	0.33	0.09	ug/kg(ng/g)

* Sediments RL is a wet weight value.

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