



# HUMBOLDT BAY MUNICIPAL WATER DISTRICT

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CAROL RISCHÉ

May 18, 2009

Catherine Kuhlman, Executive Officer  
North Coast Regional Water Quality Control Board  
5550 Skylane Blvd., Suite A  
Santa Rosa, CA 95403-1072

NCRWQCB

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Regarding: Proposed Listing of the Mad River for DDE

Dear Ms. Kuhlman,

A couple of weeks ago we learned that the North Coast Regional Water Quality Control Board was considering adding the Mad River to its "303(d) list" for the "pollutant" DDE. Since that time, we have had several discussions with Kathryn Carter of your staff who has been very helpful in answering questions and explaining where the NCRWQCB is in the process.

We understand from the staff report available on your website, and also from our discussions with Kathryn, that two of twelve samples collected in 2002 and 2003 as part of the Surface Ambient Water Monitoring Program exceeded the US EPA "Evaluation Guideline" for DDE of 0.00022 µg/l (0.22 parts per trillion). The reported results in the twelve surface water samples ranged from non-detect to 0.004 µg/l. We were informed that since 2003 additional samples have been taken with no further positive results for DDE in the surface water. We wonder how long sampling has been done on the Mad River for DDE prior to the 2002 and 2003 testing.

As a Public Water System we are responsible for providing safe drinking water in accordance with numerous federal and state drinking water standards. Additionally, we have a great interest in the protection of public health. After learning about this matter, we checked to see if we had tested the drinking water for DDE. We are fortunate that we have three test results for DDE, and in all three, DDE was not found to be present in the drinking water (note – different reporting limits than above). The tests were conducted as follows:

- In 2001, the State Department of Health Services (now Department of Public Health) conducted a specialized and comprehensive test of our drinking water. It is the most comprehensive testing that has ever been done with over 200 constituents tested. The results were favorable and demonstrated that our water is in compliance with State standards for all constituents tested. DDE was included in that test and was **not detected**.
- In 2002, the District completed testing in accordance with US EPA's Unregulated Contaminant Monitoring Rule (UCMR). Tests conducted pursuant to this rule will provide

data to US EPA to evaluate and prioritize contaminants for which they are considering establishing drinking water standards. UCMR contaminants have been segmented into three lists. DDE was included on "List 1" for which testing by Public Water Systems has already occurred. In 2002, the District completed its UCMR testing for the "List 1" contaminants, and tested for DDE twice. Both results for DDE were **not detected**.

We are concerned about the proposed listing for several reasons as follows:

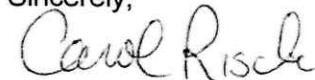
- 1) The sample results for DDE are limited and have been inconsistent. Only two of twelve results in 2002 and 2003 were positive, and since then, we understand that all results have indicated DDE not to be present.
- 2) Given the characteristics of DDE, it is not unreasonable to question the validity and consistency of the two positive test results. According to a Fact Sheet from the U.S. Department of Health and Human Services, Agency for Toxic Substances and Disease Registry, DDE is a "breakdown product" of DDT, and DDE had no commercial applications. DDT was a pesticide used to control insects in the agriculture business, but was banned in the United States in 1972.
- 3) We inquired about the process to de-list a pollutant, and learned there are many more requirements and criteria which must be met to "de-list" versus to "list" in the first place.
- 4) We are particularly concerned about possible public concern regarding their drinking water.

Given that the "303-d listing" process occurs every two years, it seems prudent to conduct additional testing of the Mad River for DDE prior to making the listing decision.

Last week, the Board of Directors of the Humboldt Bay Municipal Water District considered this issue. They respectfully request that the Regional Water Quality Control Board not list the Mad River for DDE at this time, and that additional testing be conducting to determine if listing is warranted.

Please call if you have any questions.

Sincerely,



Carol Rische

Cc: Kathryn Carter and Matt St. John, NCRWQCB Staff  
Barry Van Sickle and Steve Marshall, HBMWD  
Tony Wiedemann, District Engineer, Dept. of Public Health, Drinking Water Division - Redding  
Ronean Lund, Sanitary Engineer, Dept of Public Health, Drinking Water Division - Eureka  
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