



CITY OF EL CAJON

www.ci.el-cajon.ca.us

PUBLIC WORKS DEPARTMENT

October 26, 2009

Ms. Cynthia Gorham-Test
California Regional Water Quality Control Board
9147 Sky Park Court, Suite 100
San Diego, CA 92123

Subject: City of El Cajon Comments on Proposed 2008 303(d) Listings for the San Diego Region

Dear Ms. Gorham-Test:

Thank you for providing an opportunity to comment on the 2008 Draft Clean Water Act Sections 303(d) and 305(B) Integrated Report for the San Diego Region. Below please find comments specific to the San Diego River watershed where the City of El Cajon is located:

Item 1:

Observation: Line of Evidence I.D. No. 3336 for Decision 4942 uses data from a spill that occurred in the Forrester Creek Channel on July 5, 2000, to assess water quality.

Comment: The referenced spill caused a temporary condition of extreme pH that resulted from a transient event. The information from the spill is not a reliable source of data to assess water quality since it does not reflect ambient water conditions and should not be used as a line of evidence.

Item 2:

Observation: Line of Evidence I.D. No. 3337 for Decision 4942 uses data from a spill that occurred on May 1, 2001, to assess water quality.

Comment: The referenced spill was a transient event and should not be used as a line of evidence. The information from the spill is not a reliable source of data to assess water quality since it does not reflect ambient water conditions and should not be used as a line of evidence.

The City of El Cajon would like to emphasize that pH conditions are endemic to flow of water in a concrete lined drainage channel. One difference between El Cajon and many other cities in the San Diego area is that El Cajon has constructed an extensive network

of storm drains and drainage channels. Reference reports used as supporting information cited a majority of dry weather tests for pH that exceed the Basin Plan objective, however, there is no information linking high pH condition to any source other than flow in the concrete channel environment.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "D. Davies".

Dennis Davies,
Deputy Director of Public Works

Enclosures

Draft 2008 California 303(d)/305(b) Integrated Report Supporting Information

Regional Board 9 - San Diego Region

Water Body Name: Forester Creek
Water Body ID: CAR9071300020010924120240
Water Body Type: River & Stream

Lines of Evidence (LOEs) for Decision ID 4942

LOE ID: 3336

Pollutant: pH (high)
LOE Subgroup: Ancillary Evidence Spills
Matrix: Not Specified
Fraction: None

Beneficial Use: Industrial Service Supply

Number of Samples: 0
Number of Exceedances: 0

Data and Information Type: Not Specified
Data Used to Assess Water Quality: A letter from the City of El Cajon, by Richard C. Odiorne, City Engineer, was written to Julian Medina at Chem-tronics, Inc, in El Cajon, CA. The letter is dated July 6, 2000 and documents a 1000 gallons sodium hydroxide spill from Chem-tronic, Inc, that occurred on July 5, 2000. The letter from Richard Odiorne (City of El Cajon) asks that Chem-tronics, inc. ensure that they have Best Management Practices in place for spill preventions and cleanup.

Data Reference: Placeholder reference 2006 303(d)

Water Quality Objective/Criterion: From the Basin Plan: The pH value shall not be changed at any time more than 0.2 pH units from that which occurs naturally. Changes in normal ambient pH levels shall not exceed 0.2 units in waters with designated marine (MAR), or estuarine (EST), or saline (SAL) beneficial uses. Changes in normal ambient pH levels shall not exceed 0.5 units in fresh waters with designated cold freshwater habitat (COLD) or warm freshwater habitat (WARM) beneficial uses. In bays and estuaries the pH shall not be depressed below 7.0 nor raised above 9.0. In inland surface waters the pH shall not be depressed below 6.5 nor raised above 8.5.

Objective/Criterion Reference: Placeholder reference 2006 303(d)

Evaluation Guideline: The corresponding numeric objective for pH from the Basin Plan for inland surface waters with all beneficial uses is 6.5 (minimum) to 8.5 (maximum).

Guideline Reference: Placeholder reference 2006 303(d)

Spatial Representation: A sodium hydroxide spill occurred in the Forester Creek Channel from Chem-tronics, Inc. 1150 West Bradley Av., El Cajon, CA 92020.

Temporal Representation: The spill occurred on July 5, 2000.
Environmental Conditions:
QAPP Information: Data used in 2002 assessment. QA=?

Lines of Evidence (LOEs) for Decision ID 4942

LOE ID: 3337

Pollutant: pH (high)
LOE Subgroup: Ancillary Evidence Spills
Matrix: Not Specified
Fraction: None

Beneficial Use: Industrial Service Supply

Number of Samples: 0
Number of Exceedances: 0

Data and Information Type: Not Specified
Data Used to Assess Water Quality: A County of San Diego Department of Environmental Health referral form indicates that 10-20 gallons of an acid/water/copper mixture (pH of 2-3) spilled into Forester Creek on 05/01/2001. The spill was reported to the County of San Diego DEH by Randy Olms (employee at Chem-tronics). The complaint was referred to the City of El Cajon. It is reported that an emergency response team was on scene to conduct the clean up. County of San Diego DEH referral says that an emergency response team was on the scene to conduct a cleanup of the spill.

Data Reference: Placeholder reference 2006 303(d)

Water Quality Objective/Criterion: The pH value shall not be changed at any time more than 0.2 pH units from that which occurs naturally. Changes in normal ambient pH levels shall not exceed 0.2 units in waters with designated marine (MAR), or estuarine (EST), or saline (SAL) beneficial uses. Changes in normal ambient pH levels shall not exceed 0.5 units in fresh waters with designated cold freshwater habitat (COLD) or warm freshwater habitat (WARM) beneficial uses. In bays and estuaries the pH shall not be depressed below 7.0 nor raised above 9.0. In inland surface waters the pH shall not be depressed below 6.5 nor raised above 8.5.

Objective/Criterion Reference: Placeholder reference 2006 303(d)

Evaluation Guideline: The corresponding numeric objective for pH from the Basin Plan for inland surface waters with all beneficial uses is 6.5 (minimum) to 8.5 (maximum).

Guideline Reference: Placeholder reference 2006 303(d)

Spatial Representation: The spill occurred from 1150 W. Bradley Av., El Cajon, CA 92020 (Chem-tronics, Inc.).

Temporal Representation: The spill occurred on 05/01/2001.
Environmental Conditions: It was noted in the referral form that the acid spilled into a dry bed.
QAPP Information: Data used in 2002 assessment. QA=?
QAPP Information Reference(s):