



California Regional Water Quality Control Board

San Francisco Bay Region



Alan C. Lloyd, Ph.D.
Agency Secretary

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.waterboards.ca.gov/sanfranciscobay>

Arnold Schwarzenegger
Governor

TO: Selica Potter
Acting Clerk to the Board
State Water Resources Control Board

FROM: /s/
Thomas Mumley
Planning and TMDL Division Chief
San Francisco Bay
Regional Water Quality Control Board



303 (d) Deadline:
1/31/06

DATE: January 31, 2006

SUBJECT: PROPOSED REVISIONS TO THE 2006 303(d) LIST

We offer the following comments on the 303(d) list recommendations:

- Lake Chabot in Solano Co is incorrectly recommended for listing for several pollutants, Chlordane, DDT, Dieldrin, Mercury, and PCBs. The data are from fish in Lake Chabot in Alameda County.
- Stevens Creek is also incorrectly recommended for listing for several pollutants Chlordane, Dieldrin, Mercury, and PCBs, based on levels in fish. The data are from fish in Stevens Creek Reservoir.
- The fact sheet for the recommended listing of the San Mateo Coast for mercury sites a narrative bioaccumulation objective from our Basin Plan that does not apply. All water quality objectives for ocean waters are in the Ocean Plan.
- The recommended listing of the Napa River for mercury is not supported with sufficient data. The Toxic Substances Monitoring Program (TSMP) data cited in the fact sheet do not include two distinct representative samples that exceed the evaluation guideline. The US EPA human health fish tissue criterion of 0.3 ppm mercury in edible fish tissue applies to the average concentration of all sport fish consumed (the take-home basket at the end of the day), and assumes an average consumption rate of 17.5 grams sport fish per day. US EPA's criterion document recognizes that a percentage of trophic level 4 fish with up to 0.66 ppm mercury may be consumed while still meeting the 0.3 ppm criterion. In accordance with Listing Policy Section 6.1.5 - *Data Quantity Assessment Process*, and specifically Section 6.1.5.6 - *Evaluation of Data Consistent with the Expression of Numeric Water Quality Objectives, Water Quality Criteria, or Evaluation Guidelines*, the 1995 TSMP data should be consolidated and considered a single sample. Whether or not this more representative consolidated sample result exceeds the evaluation guideline, the single 1997 TSMP sample