



**Santa Clara Valley
Urban Runoff
Pollution Prevention Program**

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(Submitted via E-mail on June 14, 2004)

June 14, 2004

Craig J. Wilson
Chief, TMDL Listing Unit
Division of Water Quality
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Re: Delisting all segments of the San Francisco Bay for diazinon

Dear Mr. Wilson:

This letter is in response to the *Notice of Public Solicitation of Water Quality Data and Information – 2004 Clean Water Act Section 303(d) List*. In 1998, California's 1998 303(d) list (1998 list) was adopted by the State Water Resources Control Board (State Board) and approved by the United States Environmental Protection Agency (EPA). The 1998 list concluded that all segments of the San Francisco Bay are water quality limited due to the organophosphate pesticide diazinon. The State Board stated that the listing for diazinon was based on data indicating that the narrative objective for water toxicity in San Francisco Bay Water Quality Control Plan (Basin Plan) was exceeded due to aquatic toxicity identified in Bay segments. The listing went on to identify diazinon as the pollutant causing the aquatic toxicity.

Since the listing, new water quality data has been collected and analyzed from all segments of the San Francisco Bay. As indicated in a presentation given at the *2004 San Francisco Bay Regional Monitoring Program for Trace Substances (RMP) Annual Meeting* (see Attachment), data for 2000 and 2001 indicate ambient water concentrations of diazinon in the Bay are at least an order of magnitude below water quality criteria (US EPA 2000)¹. Additionally, RMP monitoring of ambient water toxicity in water samples collected from October 2001 through April 2003, also indicate an absence of toxicity to test organisms (Ogle and Gunther 2002; Ogle and Gunther 2003) (see Attachment). Therefore, the best available data suggests that the concentrations of diazinon are below water quality criteria and aquatic toxicity in the San Francisco Bay is not present; indicating that the narrative water quality objectives for toxicity (acute and chronic) are currently being met.

¹ Please note that these criteria are not California water quality objectives developed or adopted consistent with the California Water Code.

Given the information presented in the attachments, the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) requests that all segments of the San Francisco Bay be **delisted** for diazinon on the State of California's 2004 303(d) list.

If you have any questions regarding this issue, please contact me or Mr. Chris Sommers at (510) 832-2852.

Sincerely,

Original Signed BY

Adam Olivieri, Dr.PH, P.E.
SCVURPPP Program Manager

Attachments

References

Ogle S, Gunther A (2002) Ambient Water Toxicity in the San Francisco Estuary (for samples collected October 2001 through June 2002). Annual Report. San Francisco Estuary Regional Monitoring Program, San Francisco Estuary Institute, Oakland, CA

Ogle S, Gunther A (2003) Ambient Water Toxicity in the San Francisco Estuary (for samples collected November 2002 through April 2003). Draft Annual Report. San Francisco Estuary Regional Monitoring Program, San Francisco Estuary Institute, Oakland, CA.

U.S. EPA (2000) Draft Ambient Aquatic Life Water Quality Criteria for Diazinon. Office of Water, U.S. EPA, Washington, D.C.