Colorado River Basin Regional Water Quality Control Board

Comments Regarding SWRCB 303(d) List Recommendations

January 5, 2006
Issues of Concern

- Listing Colorado River:
  - Manganese

- Listing All American Canal:
  - Sulfate
  - Total dissolved solids (TDS)
  - Specific conductance (SC)
Listing Colorado River for Manganese

- Section 6.1.5.1 of the Listing Policy requires water body specific information
- Samples taken from Reservation Main Drain 4 **Not** Colorado River
- Reservation Main Drain 4 is in Bard Valley Drains (**No municipal BU**)
- Bard Valley located in Lower Colorado River Basin
Listing All American Canal for Sulfate, TDS, & SC

- Water quality of AAC = Colorado River WQ
- Colorado River WQO is 879 mg/l (Basin Plan)
- WQ of AAC in terms of Sulfate, TDS, and SC within allowable limits of CCR
- Section 2.1 of the Listing Policy requires TMDL(s) to remedy impairments
- No point or nonpoint sources discharge into AAC
- Salinity WQSs of Colorado River is addressed by the Seven States Colorado River Salinity Control Form
Listing All American Canal for Sulfate, TDS, & SC

- Secondary MCLs
  - Established for taste, odor or appearance of drinking water

- Listing recommendations
  - > the Recommended Secondary MCLs
    - 65 of 71 samples for SC
    - 70 of 71 samples for TDS
    - 53 of 66 samples for sulfate
## CCR Title 22
### Secondary MCLs

<table>
<thead>
<tr>
<th>Constituent</th>
<th>Recommended</th>
<th>Upper</th>
<th>Short Term</th>
</tr>
</thead>
<tbody>
<tr>
<td>TDS (mg/l)</td>
<td>500</td>
<td>1,000</td>
<td>1,500</td>
</tr>
<tr>
<td>SC (micromhos)</td>
<td>900</td>
<td>1,600</td>
<td>2,200</td>
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<tr>
<td>Sulfate (mg/l)</td>
<td>250</td>
<td>500</td>
<td>600</td>
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</table>
CCR Title 22
Secondary MCLs

- Concentrations $< \text{Recommended}$
  - "Higher degree of consumer acceptance"

- Concentrations between $\text{Recommended} \ & \ \text{Upper}$
  - "Acceptable if it is neither reasonable not feasible to provide more suitable water"

- Concentrations between $\text{Upper} \ \text{and Short Term}$
  - "Acceptable only for existing systems on a temporary basis"
All American Canal (AAC)

- Delivers about 3.1 million acre-feet/year of Colorado River water to Imperial and Coachella Valleys
- Only 2% supplies drinking water to Imperial Valley cities
- Both TDS & SC measure water salinity
  - $\text{TDS} = 0.9$ to $0.5 \text{ SC}$
- Annual WQ reports meet DHS, USEPA, & CCR levels for TDS and sulfate
All American Canal TDS Data

- Measured TDS
- Recommended
- BP Objective
- Upper

TDS Concentration (mg/l)

Date (Month-Year)

All American Canal TDS Data

- 3 of 71 samples > WQO for Colorado River
- 1 of 71 samples > Upper Secondary MCL
- 70 of 71 samples > Recommended Secondary MCL
All American Canal Sulfate Data

- Measured Sulfate  
- Recommended  
- Upper

<table>
<thead>
<tr>
<th>Date (Month-Year)</th>
<th>Measured Sulfate</th>
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<tr>
<td>Jun-98</td>
<td>260</td>
</tr>
<tr>
<td>Sep-98</td>
<td>280</td>
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<tr>
<td>Dec-98</td>
<td>290</td>
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<tr>
<td>Mar-99</td>
<td>300</td>
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<td>Mar-00</td>
<td>350</td>
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<td>Jun-00</td>
<td>360</td>
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<tr>
<td>Sep-00</td>
<td>370</td>
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<tr>
<td>Dec-00</td>
<td>380</td>
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<td>490</td>
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<td>Dec-03</td>
<td>500</td>
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</table>
All American Canal Sulfate Data

- 0 of 71 samples > Upper
  - Secondary MCL
- 53 of 66 samples > Recommended
  - Secondary MCL
Conclusion

- Do not list Colorado River for Manganese
- Do not list AAC for SC, TDS, and Sulfate:
  - Insufficient exceedance of allowable limits (CCR Upper Secondary MCLs)
  - Insufficient exceedance of WQO for TDS in Colorado River
  - TMDLs for TDS and sulfate are neither reasonable nor feasible (Listing Policy and CCR)