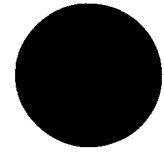


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Colorado River Basin Regional Water Quality Control Board

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

<u>Constituent</u>	<u>Recommended</u>	<u>Upper</u>	<u>Short Term</u>
TDS (mg/l)	500	1,000	1,500
SC (micromhos)	900	1,600	2,200
Sulfate (mg/l)	250	500	600

CCR Title 22

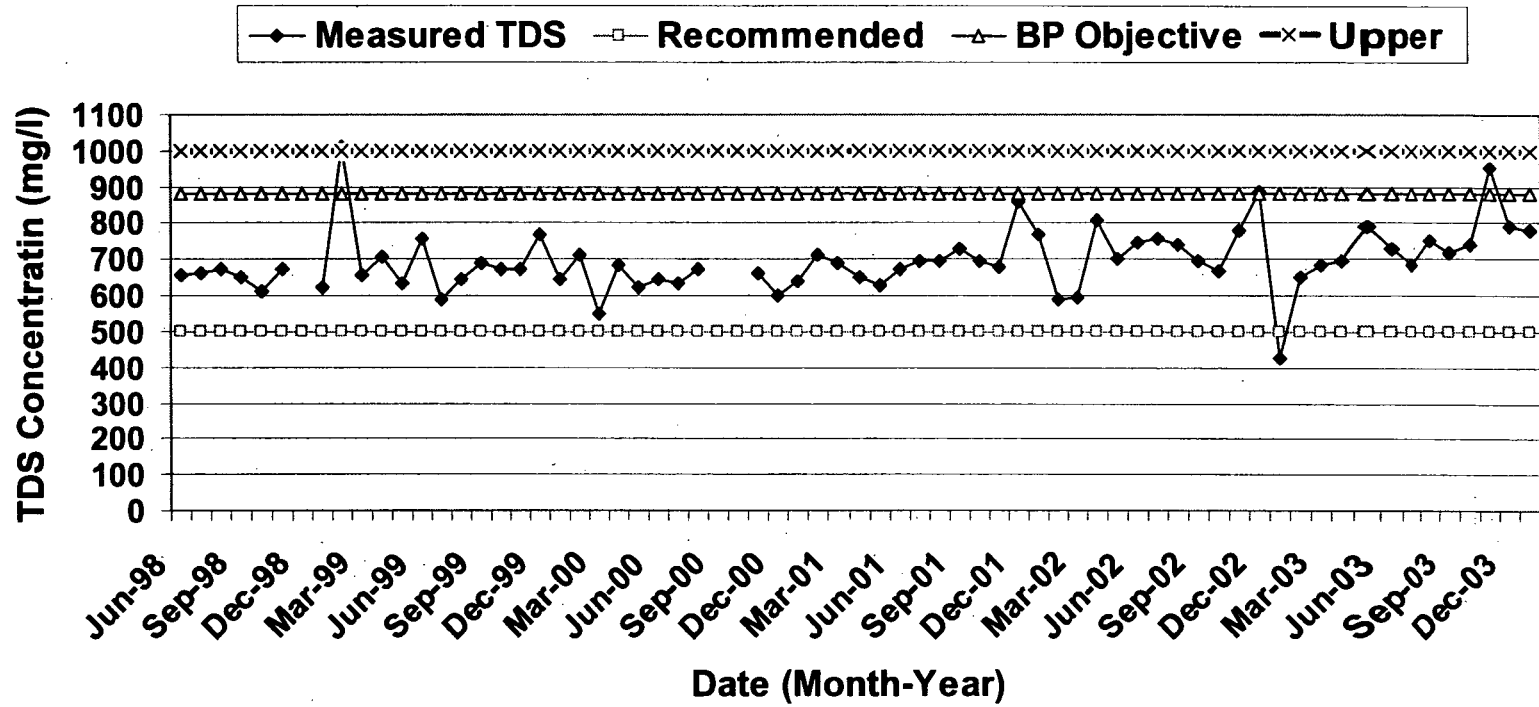
Secondary MCLs

- Concentrations < Recommended
 - “Higher degree of consumer acceptance”
- Concentrations between Recommended & Upper
 - “Acceptable if it is neither reasonable not feasible to provide more suitable water”
- Concentrations between Upper 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
 - **TDS = 0.9 to 0.5 SC**
- Annual WQ reports meet DHS, USEPA, & CCR levels for TDS and sulfate

All American Canal TDS Data

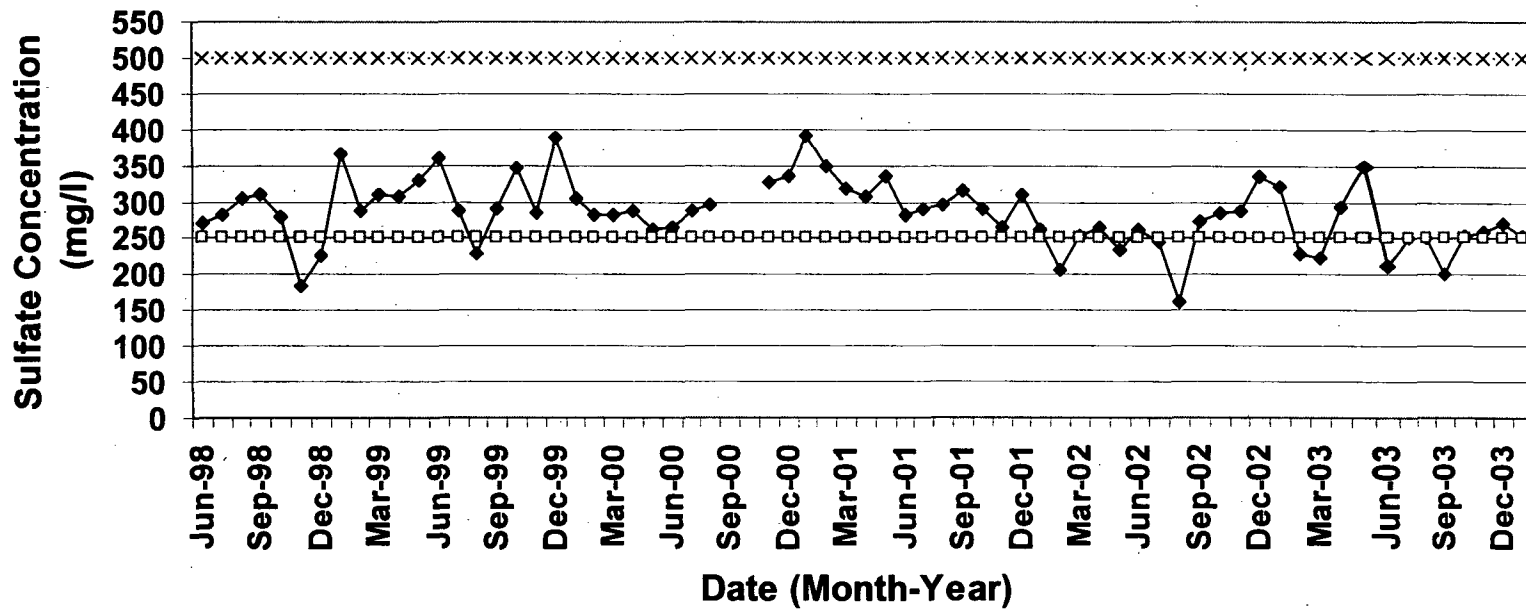


All American Canal TDS Data

- 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



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)