



ATTACHMENT B

FACT SHEETS ON SPECIFIC LISTINGS

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ATTACHMENT B
FACT SHEETS ON SPECIFIC LISTINGS
FACT SHEET NO. 1

LISTING: Ammonia in SCR Reaches 5 and 6

RECOMMENDATION: Do not list

REASON: Current data show attainment of water quality standard
Data do not meet requirements of Table 3.1 for Listing
Data meet requirements of Table 4.1 for De-Listing

We request that Santa Clara River Reaches 5 (Blue Cut to West Pier Hwy 99) and 6 (West Pier Hwy 99 to Bouquet Canyon Road Bridge) be removed from the 303(d) list as impaired due to ammonia. Current water quality data show that the Basin Plan's water quality objectives for ammonia are being met and, therefore, no impairments exists. The data referenced below were compared with the reach-specific ammonia chronic toxicity criteria values shown in the June 2003 Santa Clara River Nitrogen TMDL staff report, which used site-specific 50th percentile pH and temperature data consistent with the EPA's 1999 updated ammonia criteria document. These chronic criteria require mean 30-day ammonia concentrations less than 1.3-3.5 mg/L as N depending on specific location within Reaches 5 and 6. No exceedances of the acute (i.e., 1-hour and 4-hour) criteria for ammonia were found in the data that are provided.

The following table and chart summarizes the available datasets, and listing requirements, for ammonia. No exceedances were observed in SCR Reach 6, and only one sample of 83 exceeded the applicable criteria in SCR Reach 5. Thus, the statistical requirements of Table 3.1, "Minimum Number of Measured Exceedances Needed to Place a Water Segment on the Section 303(d) List for Toxicants," of the SWRCB's 303(d) Listing Policy are not met. Note also that the results for station NR3, located in upper Reach 4, indicate that there have been no observed downstream exceedances, based on 20 months of monitoring.

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Table 1. Ammonia 303d Data Summary Table (monthly averages shown)

Site ¹	RWQCB Reach	Sample Size	Min ² , mg/L as N	Mean ² , mg/L as N	Max ² , mg/L as N	WQS ³ , mg/L as N	# Exceed	Min # Exceed Req'd. to List
RB	6	21	0.10	0.62	2.60	3.5	0	--
RB01	6	20	0.10	0.11	0.20	3.5	0	--
Total Reach 6	6	41	0.10	0.37	2.60	3.5	0	4
RC	2	21	0.10	0.13	0.80	2.2	0	--
RD	5	21	0.10	0.60	2.90	2.3	1	--
RE	5	21	0.10	0.14	0.70	2.3	0	--
NR1	5	20	0.01	0.14	0.38	1.3	0	--
Total Reach 5	5	83	0.01	0.26	2.90	1.3-2.3	1	8
NR3	4	20	0.01	0.14	0.32	1.3	0	--

¹ RB, RB01, RC, RD, and RE are LACSD NPDES permit monitoring stations, with monthly data shown for the date range January 2004 – October 2005 (i.e., all post-nitrification/denitrification implementation). NR1 and NR3 are Newhall NPDES permit application monitoring stations, with monthly data shown for the date range May 2004 – December 2005. NR3 is located at the upstream end of EPA Reach 4, and is included here only for discussion purposes.

² For the purpose of statistical analysis and data summarization, below detection values were conservatively assumed equal to the reporting limit.

³ Basin Plan Objectives for chronic (i.e., 30-day) toxicity shown, based on values reported in June 2003 SCR Nitrogen TMDL staff report.

A chart showing the raw data grouped by monitoring station is included below for reference. The raw data are also included on a separate CD for SWRCB staff review and for inclusion in the administrative record. Based on review of the chart below, it is clear that ammonia levels throughout Reaches 5 and 6 have been very low over the past two years, and that only one exceedance of the chronic criterion has been observed in 125 samples collected monthly at six different NPDES permit monitoring locations throughout these reaches.

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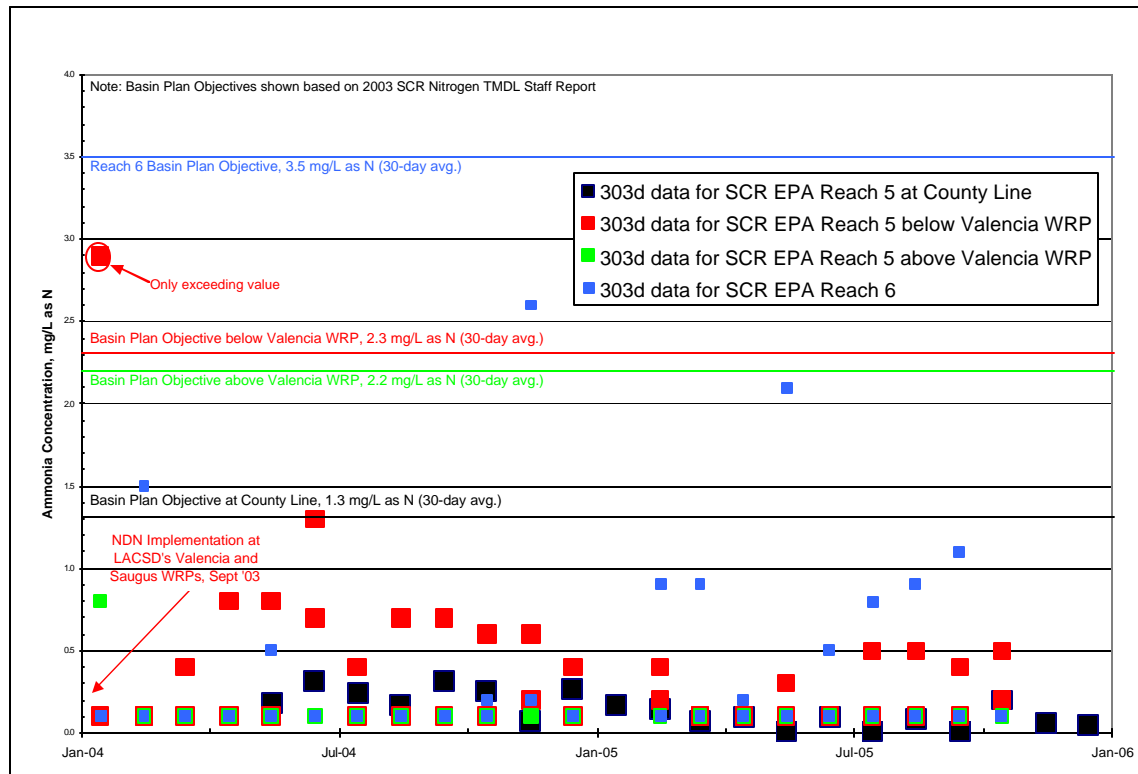


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Figure 1. Ammonia 303d Data Summary Chart, SCR Reaches 5 and 6



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**FACT SHEET NO. 2****LISTING:** Diazinon**RECOMMENDATION:** Do not list

REASON: Current data show attainment of water quality standard
Recent data do not meet the requirements of Table 3.1 for Listing
Diazinon has been banned and is not persistent

We request that Santa Clara River Reach 5 (Blue Cut to West Pier Hwy 99) be removed from the 303(d) list as impaired due to diazinon because current water quality data show that the applicable objective for diazinon is met. The California DFG chronic toxicity criterion for diazinon is 0.1 ug/L.

Recent (i.e., post-diazinon ban) water quality data from Santa Clara River Reach 6 (West Pier Hwy 99 to Bouquet Canyon Road Bridge) show that the Basin Plan's water quality objective for diazinon is met. Diazinon has a short half-life in soils (from 2-4 weeks) (Wauchope, R. D., Buttler, T. M., Hornsby A. G., Augustijn-Beckers, P. W. M. and Burt, J. P. SCS/ARS/CES Pesticide properties database for environmental decisionmaking. Rev. Environ. Contam. Toxicol. 123: 1-157, 1992.5-20) so that concentrations have declined rapidly following the ban. Thus, no current impairment exists. However, should this proposed listing remain, Reach 6 should be listed under the "Water Quality Limited Segments Being Addressed" category due to the existing USEPA ban on diazinon sales for residential use.

The following table and chart summarize the available datasets and listing requirements for diazinon. The data from Reach 5 do not meet the statistical requirements of Table 3.1, "Minimum Number of Measured Exceedances Needed to Place a Water Segment on the Section 303(D) List for Toxicants," of the SWRCB's 303(d) Listing Policy, and therefore do not support the hypothesis for listing of this existing listing. Reach 4 results are also shown for reference and to demonstrate downstream compliance as well.

Table 2. Diazinon 303d Data Summary Table for EPA Reach 4 of SCR

Agency-Site ¹	Sample Size	Min ² , ug/L	Mean ² , ug/L	Max ² , ug/L	WQS, ug/L	# Exceed	Min # Exceed Req'd. to List
Newhall-NR3	20	<0.05	<0.05	<0.05	0.1	0	2

¹ NR3 is a Newhall NPDES permit application monitoring station located in the upper portion of Reach 4; data are shown for this station for the date range May 2004 – December 2005, and is included here only for discussion purposes.

² For the purpose of statistical analysis and data summarization, non-detect results were assumed equal to the reporting limits. "<" qualifier indicates below detection results, with reporting limit values shown.

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Table 3. Diazinon 303d Data Summary Table for EPA Reach 5 of SCR

Agency-Site ¹	Sample Size	Min ² , ug/L	Mean ² , ug/L	Max ² , ug/L	WQS, ug/L	# Exceed	Min # Exceed Req'd. to List
LACSD-RC	9	<0.05	<0.05	<0.05	0.10	0	--
LACSD-RD	9	<0.05	<0.05	<0.05	0.10	0	--
LACSD-RE	9	<0.05	<0.05	<0.05	0.10	0	--
SWAMP-403STC004	1	0.03	0.03	0.03	0.10	0	--
Newhall-NR1	20	<0.05	<0.05	<0.05	0.10	0	--
SWAMP-403STCNRB	2	0.05	0.08	0.11	0.10	1	--
Total Reach 5	50	0.03	0.05	0.11	0.10	1	5
Total Reach 5 (post-12/04)	47	<0.05	<0.05	<0.05	0.10	0	4

¹ RC, RD, and RE are LACSD NPDES permit monitoring stations located in the upper portions of Reach 5; data are shown for these stations for the date range January 2004 – July 2005. NR1 is a Newhall NPDES permit application monitoring station located in the lower portion of Reach 5; data are shown for this station for the date range May 2004 – December 2005. 403STCNRB and 403STC004 are SWAMP monitoring stations located at the bottom of Reach 5 and between NR3 and RE, respectively; data are shown for this station for the October/November 2001 monitoring events, with duplicate samples combined for statistical summary purposes.

² For the purpose of statistical analysis and data summarization, non-detect results were assumed equal to the reporting limits. “<” qualifier indicates below detection results, with reporting limit values shown.

Reach 6 diazinon data are summarized in the table below. USEPA’s phaseout of diazinon began on December 31, 2000 and was complete by December 31, 2004. Since diazinon has a short half-life in the environment (2-4 weeks in soils), the phaseout has resulted in a rapid decline in concentrations in the environment and in receiving waters. Thus, only recent (post-ban) data should be considered in evaluating this listing. As Section 6.1.5.3 of the Listing Policy, supporting a determination that this proposed listing is not warranted. Section 6.1.5.3 of the Listing Policy states, “If the implementation of a management practice(s) has resulted in a change in the water body segment, only recently collected data [since the implementation of the management measure(s)] should be considered.” Thus, diazinon in SCR Reach 6 should not be listed.

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Table 4. Diazinon 303d Data Summary Table for EPA Reach 6 of SCR

Agency-Site ¹	Sample Size	Min ² , ug/L	Mean ² , ug/L	Max ² , ug/L	WQS, ug/L	# Exceed	Min # Exceed Req'd. to List
LACSD-RB	8	<0.05	0.16	0.51	0.10	2	--
SWAMP-403STC019	1	0.04	0.04	0.04	0.10	0	--
LADPW-S29	6	<0.01	0.13	0.43	0.10	2	--
Total Reach 6	15	<0.01	0.14	0.51	0.10	4	2
Total Reach 6 (post-12/04)	4	<0.05	0.18	0.51	0.10	1	2

¹ RB is a LACSD NPDES permit monitoring station located immediately downstream of the Saugus WRP; data are shown for this station for the date range January 2004 – July 2005. 403STC019 is a SWAMP monitoring station located near the bottom of Reach 6; data are shown for this station for the October 2001 SWAMP monitoring events. S29 is an LADPW mass emission monitoring station located at the bottom of Reach 6; data are shown for this station for the date range August 2002 – April 2003.

² For the purpose of statistical analysis and data summarization, non-detect results were assumed equal to the reporting limits. "<" qualifier indicates below detection results, with reporting limit values shown.

A chart showing the raw data grouped by monitoring station is included below for reference. The data are also included on a separate CD for SWRCB staff review and for inclusion in the administrative record. Based on review of the chart below, it is clear that exceedances are infrequent, limited only to Reach 6 stations, and mostly occur prior to the end of the USEPA diazinon phase-out period.

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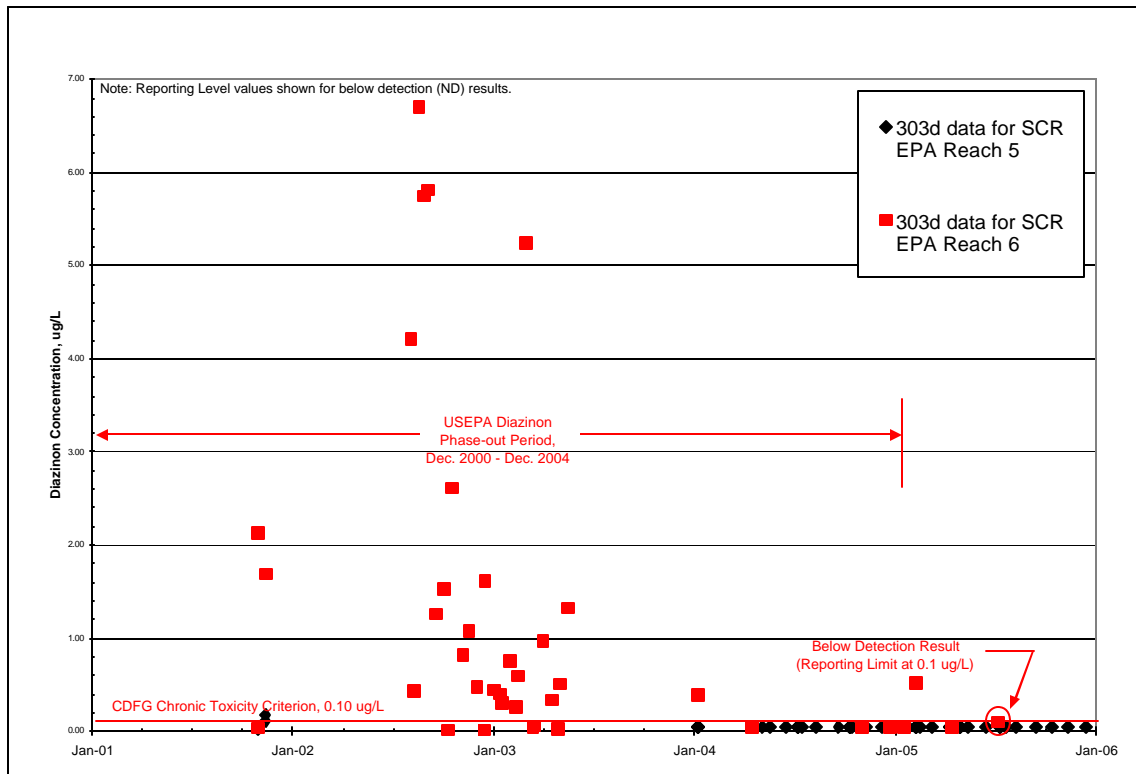
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Figure 2. Diazinon 303d Data Summary Chart, SCR Reaches 5/6



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FACT SHEET NO. 3

LISTING (Existing): Nitrate plus nitrite

RECOMMENDATION: De-list

REASON: Current data show attainment of water quality standard
 Data do not meet the requirements of Table 3.2 for Listing
 Data do meet the requirements of Table 4.2 for De-Listing

We request that Santa Clara River Reach 5 (Blue Cut to West Pier Hwy 99) be removed from the 303(d) list as impaired due to nitrate plus nitrite because current water quality data show that the Basin Plan's water quality objective for nitrate plus nitrite is being met and, therefore, no impairment exists. The water quality objective for nitrate plus nitrite is based on historic water quality conditions and requires a mean 30-day nitrate plus nitrite concentration less than 5.0 mg/L as N. In contrast, the draft 303(d) fact sheet describes an MUN beneficial use as basis for this listing, but there is no applicable MUN beneficial use for this reach of the SCR.

The following table and chart summarizes the available datasets, and listing requirements, for nitrate plus nitrite. Based on this information, it is clear that the very low number of observed nitrate plus nitrite exceedances in Reach 5 (10 of 83 total samples) meet the statistical requirements of Table 4.2, "Maximum Number of Measured Exceedances Allowed to Remove a Water Segment from the Section 303(D) List for Conventional¹ or Other Pollutants," of the SWRCB's Listing/Delisting Policy. Thus, data support delisting nitrate plus nitrite in SCR Reach 5.

¹ Because the MUN designation does not serve as the basis for this listing (the 5.0 mg/L as N objective is instead antidegradation-based), nitrate plus nitrite is to be treated as a "conventional or other pollutant" rather than a "toxicant", and therefore Table 4.2 rather than 4.1 applies.

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Table 5. Nitrate plus Nitrite 303d Data Summary Table

Site ¹	RWQCB Reach	Sample Size	Min ² , mg/L as N	Mean ² , mg/L as N	Max ² , mg/L as N	WQS, mg/L as N	# Exceed	Max # Exceed Req'd. to Delist
RC	5	21	1.37	2.21	3.89	5.0	0	--
RD	5	21	2.09	4.32	6.70	5.0	8	--
RE	5	21	0.51	3.32	6.28	5.0	2	--
NR1	5	20	1.07	2.98	5.00	5.0	0	--
BlueCut	5	14	0.51	2.68	3.49	5.0	0	--
Total	5	97	0.51	3.17	6.70	5.0	10	15
NR3	4	20	1.36	3.06	4.74	5.0	0	--

¹ RC, RD, and RE are LACSD NPDES permit monitoring stations, with monthly data shown for the date range September 2003 – July 2005. NR1 and NR3 are Newhall NPDES permit application monitoring stations, with monthly data shown for the date range May 2004 – December 2005. NR3 is located at the upstream end of EPA Reach 4, and is included here only for discussion purposes. Blue Cut is a UWCD monitoring station located at the bottom of Reach 5, with monthly data shown for the date range September 2003 – January 2005. All data shown is post-NDN implementation at LACSD's Valencia and Saugus WRPs.

² For the purpose of statistical analysis and data summarization, below detection values (applicable to nitrite only, which represents a very minor fraction of the overall nitrate plus nitrite concentration) were assumed equal to the reporting limit. When nitrite data was unavailable (as was the case for some Blue Cut samples; the rest were all below detection), a value equal to the reporting limit was assumed.

A chart showing the raw data grouped by monitoring station is included below for reference. This raw data is also included on a separate CD for SWRCB staff review and for inclusion in the administrative record. Based on review of the chart below, it is clear that exceedances are infrequent and limited only to stations RD and RE (immediately downstream of the Valencia WRP). Furthermore, it should be noted that exceedances have been rarer since the implementation of nitrification-denitrification (NDN) processes at the Valencia and Saugus WRPs, which had come on-line by September 2003. In this case, more recent data (i.e., after NDN implementation) should be used preferentially consistent with Section 6.1.5.3 of the Listing Policy, therefore further supporting the removal of this proposed listing. Section 6.1.5.3 of the Listing Policy states, "If the implementation of a management practice(s) has resulted in a change in the water body segment, only recently collected data [since the implementation of the management measure(s)] should be considered."

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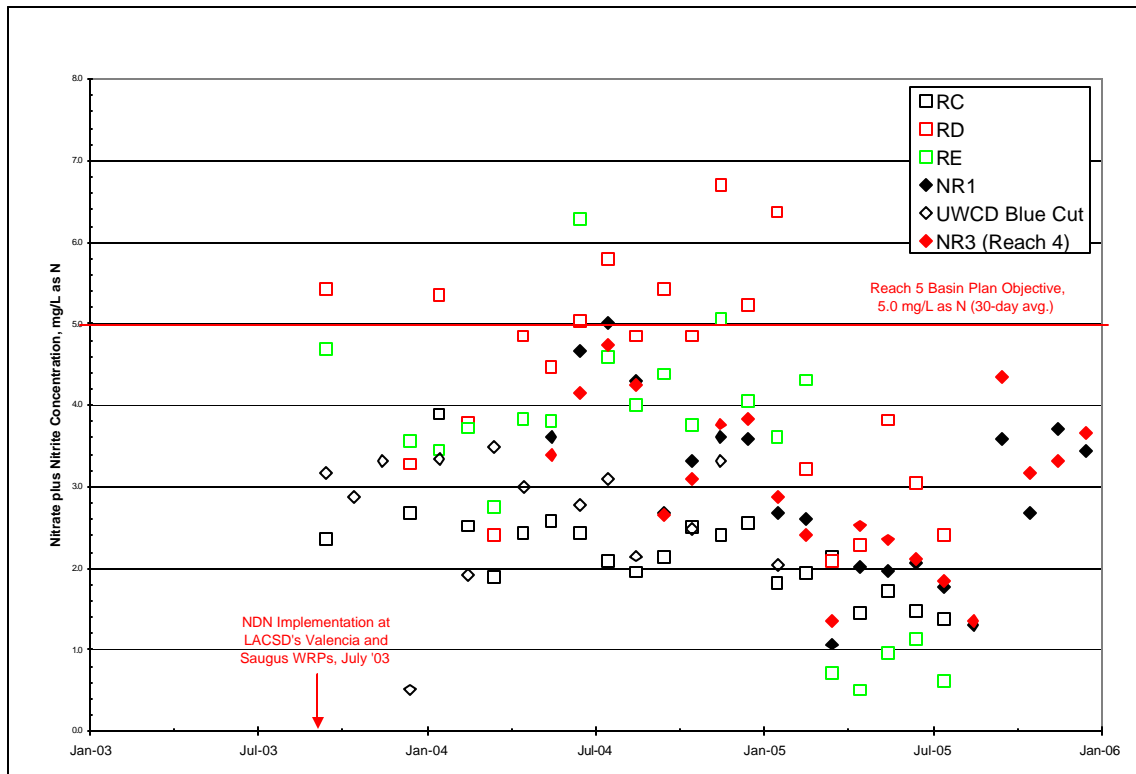


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Figure 3. Nitrate plus Nitrite 303d Data Summary Chart, SCR Reach 5



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FACT SHEET NO. 4

LISTING: Nitrite in Santa Clara River Reach 6

RECOMMENDATION: Do not list

REASON: Current data show attainment of water quality standard

Current water quality data from Santa Clara River Reach 6 (West Pier Hwy 99 to Bouquet Canyon Road Bridge) show that the Basin Plan's water quality objective for nitrite is being met and, therefore, no impairment exists. The water quality objective for nitrate plus nitrite requires a mean 30-day nitrite concentration less than 1.0 mg/L as N.

The following table and chart summarizes the available datasets, and listing requirements, for nitrite. No nitrite exceedances in Reach 6 have been observed in the 43 samples collected. Thus, these data do not meet the statistical requirements of Table 3.1, "Minimum Number of Measured Exceedances Needed to Place a Water Segment on the Section 303(D) List for Toxicants," of the SWRCB's 303(d) Listing Policy. Reach 4 results are also shown for reference and to demonstrate downstream compliance as well.

Table 6. Nitrite 303d Data Summary Table

Site ¹	RWQCB Reach	Sample Size	Min ² , mg/L as N	Mean ² , mg/L as N	Max ² , mg/L as N	WQS, mg/L as N	# Exceed	Max # Exceed Req'd. to Delist
RB	5	21	<0.02	0.13	0.77	5.0	0	--
RB01	5	22	0.02	0.03	0.05	5.0	0	--
Total	5	43	0.02	0.08	0.77	5.0	0	4

¹ RB and RB01 are LACSD NPDES permit monitoring stations, with monthly data shown for the date range September 2003 – July 2005. All data shown is post-NDN implementation at LACSD's Valencia and Saugus WRPs.

² For the purpose of statistical analysis and data summarization, below detection values were assumed equal to the reporting limit.

A chart showing the raw data grouped by monitoring station is included below for reference. These raw data are also included on a separate CD for SWRCB staff review and for inclusion in the administrative record. No Reach 6 nitrite exceedances have been observed since September 2003 for when LACSD's the new NDN treatment processes came on-line at their Valencia and Saugus WRPs.

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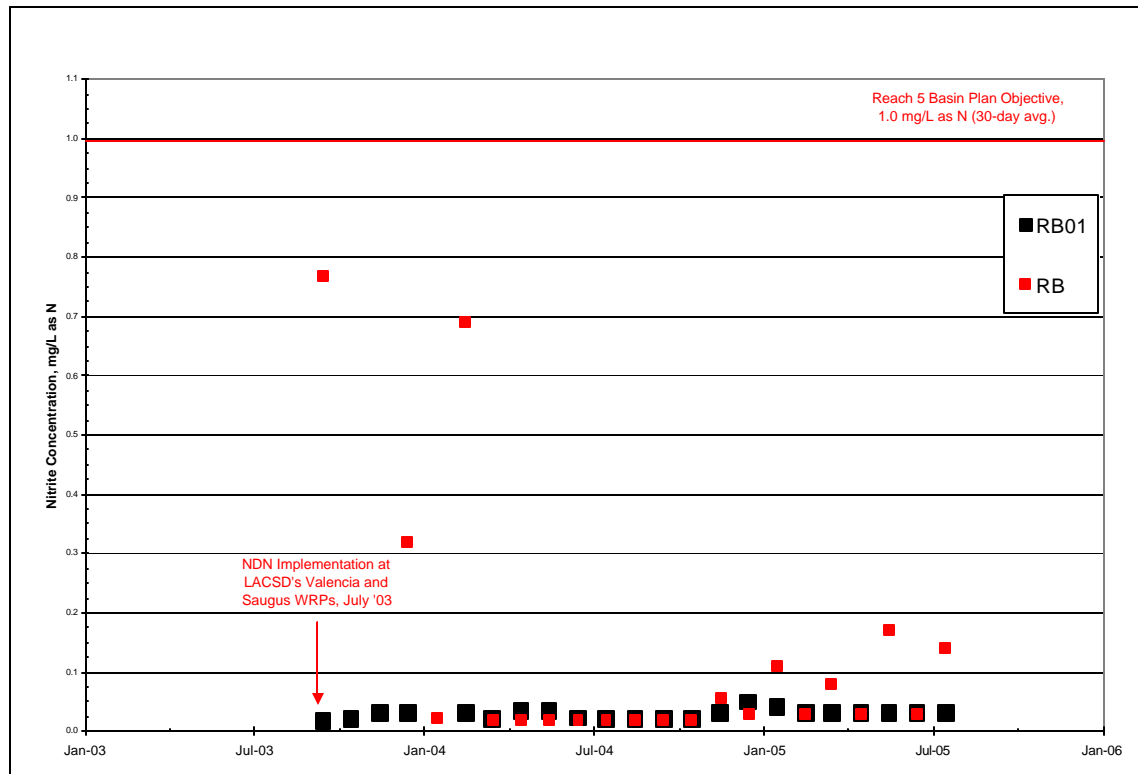


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Figure 4. Nitrite 303d Data Summary Chart, SCR Reach 6



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