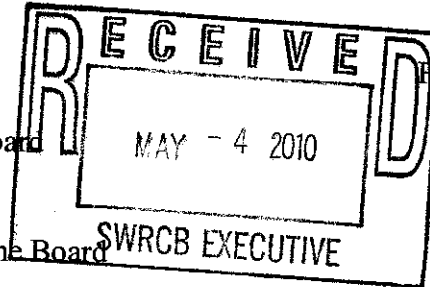




6/15 Board Meeting  
2010 Integrated Report 303(d)  
Deadline: 5/28/10 by 12 noon

DEPARTMENT OF PUBLIC WORKS OPERATIONS



April 28, 2010  
File # 0780-85-KY181

California State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814  
Attention: Ms. Jeanine Townsend, Clerk to the Board

**SUBJECT: COMMENT LETTER – 2010 INTEGRATED REPORT/SECTION 303(d) LIST**

Thank you for the opportunity to provide comments on the proposed 2010 Clean Water Act Section 303(d) list. The City of Chula Vista has carefully reviewed the proposed 303(d) list, Lines of Evidence (LOE), and monitoring data that have been used to list Poggi Canyon Creek for DDT. The following are our comments that we trust will meet your consideration before the 303(d) list is finalized.

Identical comments were provided to the San Diego Regional Water Quality Control Board (Regional Board) during the public review and comment period. The Regional Board agreed with the City of Chula Vista in removing Poggi Canyon Creek listing for impairment by DDT (a copy of the Regional Board's response to the comment is provided in Attachment 1). However, the listing has not been removed. Below are supporting evidence for our request to remove this water segment/pollutant combination from the 2010, 303(d) list.

**Poggi Canyon Creek/DDT**

**Fact Sheet:**

The Fact Sheet states that this pollutant is being considered for placement on the Section 303(d) list under Section 3.1 of the Listing Policy. One LOE (3359) is presented to support the listing of Poggi Canyon Creek for DDT. The Fact Sheet further states that according to results in the SWAMP Report, 2004, two of three samples collected from March through September 2002, exceeded the California Toxics Rule (CTR). The Fact Sheet also states that data used satisfies the data quality requirements of Section 6.1.4 of the Listing Policy.

**Comment:**

In reviewing the SWAMP data, three samples were taken in 2003 on 01/21/2003 (two test results), 04/21/2003 (one test result), and 05/15/2003 (six test results). Please see Attachment 2 for SWAMP test results. Based on the available data in the SWAMP database:

- The two entries from 01/21/2003 both had no result listed.
- The one entry from 04/21/2003 had no result listed and was "Estimated; non-compliant with associated QAPP."

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Post-Consumer Recycled Paper

- Out of the six entries from 05/15/2003, four of them were "Matrix Spike/Matrix Spike Duplicate," indicating that they are blank samples. Two of these entries did not have results.

Conclusion:

Based on the presented data, only one sample (taken on 05/15/2003) out of the three samples taken is valid and, therefore, the data does not meet the requirements of Table 3.1 of the Listing Policy.

Recommendation:

Since there are insufficient valid sample results from Poggi Canyon Creek, the referenced LOE does not meet the requirements of Table 3.1 of the Listing Policy and, therefore, Poggi Canyon Creek should not be 303(d) listed for DDT.

Thank you for your consideration of the above. Should you have any questions or if you need further information, please call me at (619) 397-6111.



KHOSRO AMNPOUR  
SENIOR CIVIL ENGINEER

- C: Matt little, Assistant Director of Public Works  
Silvester Evetovich, Principal Civil Engineer  
Marisa Soriano, Environmental Health Specialist

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**ITEM 15**  
**Supporting Document 13**

**Appendix L:**  
**Responses to Public Comments**

Creek, the referenced LOE does not meet the requirements of Table 3.1 of the Listing Policy and, therefore, Poggi Canyon Creek should not be 303(d) listed for selenium.

**Regional Board Response:**

The Regional Board staff will recommend removing Poggi Canyon Creek listing for impairment by Selenium from the 2008 303(d) List. Only one of three samples was found to be in compliance with the SWAMP QAPP. This is an insufficient amount of data for a 303(d) List assessment.

**Comment ID: 180**

**TOPIC(S):** Poggi Creek DDT

**ORGANIZATION:** City of Chula Vista

**NAME:** Khosro Aminpour

**Comment:**

Poggi Creek DDT

The two entries from 1/21/2003 both had no result listed. The one entry from 4/21/2003 had no results listed and was "Estimated; non-compliant with associated QAPP." Out of the six entries from 5/15/2003, four of them were "Matrix Spike/Matrix Spike Duplicates," indicating that they are black samples. Two of these entries did not have results.

Based on the presented data, only one sample (taken 5/15/2003) out of the three samples taken is valid and, therefore, the data does not meet the requirements of Table 3.1 of the Listing Policy. Since there are insufficient valid sample results from Poggi Canyon Creek, the referenced LOE does not meet the requirements of Table 3.1 of the Listing Policy and, therefore, Poggi Canyon Creek should not be 303(d) listed for DDT.

**Regional Board Response:**

The Regional Board staff will recommend removing Poggi Canyon Creek listing for impairment by DDT from the 2008 303(d) List. The Poggi Canyon Creek samples collected were below the detection limit of 0.002 ug/l, which also was below the CTR value of 0.005 ug/l.

**Comment ID: 181**

**TOPIC(S):** Sweetwater River TDS, Salinity, Chloride

**ORGANIZATION:** City of Chula Vista

**NAME:** Khosro Aminpour

**Comment:**

Sweetwater River TDS, Salinity, Chloride

Two LOEs (7185, 6519) are presented to support the listing of the Sweetwater River for TDS/Salinity/Chloride. San Diego County Municipal Copermittees' Annual Progress Report, 2007, indicates that eleven of fifteen samples collected exceed the Water Quality Objectives for Total Dissolved Solids. The SWAMP Report, 2007 indicates that four of the eight samples collected at the Sweetwater River show excess sulfate concentrations. The only valid LOE presented in the Fact Sheet supports Listing of the Low Sweetwater River for TDS and not salinity or chloride.

**ATTACHMENT 2  
Poggi Creek - DDT**

Project	Agency	Station Code	Station Name	Sample Date	Sample Time	Sample Type	Analyte	Fraction	Result	Units	Lab Comments	QAC Description
Surface Water Ambient Monitoring Program	State Water Resources Control Board	9100TPOG3	Poggi Creek 3	05/15/2003	9:30	Normal Grab Sample	p,p'-DDT	None		µg/L	Sample preparation date was 01/01/1950.Digest extraction method was EPA 3510C. Extraction date was 05/19/2003.	Compliant with associated QAPP
Surface Water Ambient Monitoring Program	State Water Resources Control Board	9100TPOG3	Poggi Creek 3	05/15/2003	9:30	Matrix Spike/Matrix spike duplicate	p,p'-DDT	None	0.0204	µg/L	Expected Result 0.02. Sample preparation date was 01/01/1950.Digest extraction method was EPA 3510C. Extraction date was 05/19/2003.	Compliant with associated QAPP
Surface Water Ambient Monitoring Program	State Water Resources Control Board	9100TPOG3	Poggi Creek 3	05/15/2003	9:30	Matrix Spike/Matrix spike duplicate	p,p'-DDT	None	0.0248	µg/L	Expected Result 0.02. Sample preparation date was 01/01/1950.Digest extraction method was EPA 3510C. Extraction date was 05/19/2003.	Compliant with associated QAPP
Surface Water Ambient Monitoring Program	State Water Resources Control Board	9100TPOG3	Poggi Creek 3	05/15/2003	9:30	Matrix Spike/Matrix spike duplicate	p,p'-DDT	None	0.0244	µg/L	Expected Result 0.02. Sample preparation date was 01/01/1950.Digest extraction method was EPA 3510C. Extraction date was 05/19/2003.	Compliant with associated QAPP
Surface Water Ambient Monitoring Program	State Water Resources Control Board	9100TPOG3	Poggi Creek 3	01/21/2003	11:15	Normal Grab Sample	p,p'-DDT	None		µg/L	Sample preparation date was 01/01/1950.Digest extraction method was EPA 3510C. Extraction date was 01/25/2003.	Compliant with associated QAPP
Surface Water Ambient Monitoring Program	State Water Resources Control Board	9100TPOG3	Poggi Creek 3	04/21/2003	11:15	Normal Grab Sample	p,p'-DDT	None		µg/L	Sample preparation date was 01/01/1950.Digest extraction method was EPA 3510C. Extraction date was 04/25/2003.	Estimated; non-compliant with associated QAPP
Surface Water Ambient Monitoring Program	State Water Resources Control Board	9100TPOG3	Poggi Creek 3	04/21/2003	11:15	Normal Grab Sample	p,p'-DDT	None		µg/L	Sample preparation date was 01/01/1950.Digest extraction method was EPA 3510C. Extraction date was 04/25/2003.	Estimated; non-compliant with associated QAPP
Surface Water Ambient Monitoring Program	State Water Resources Control Board	9100TPOG3	Poggi Creek 3	01/21/2003	11:15	Normal Grab Sample	p,p'-DDT	None		µg/L	Sample preparation date was 01/01/1950.Digest extraction method was EPA 3510C. Extraction date was 01/25/2003.	Compliant with associated QAPP
Surface Water Ambient Monitoring Program	State Water Resources Control Board	9100TPOG3	Poggi Creek 3	05/15/2003	9:30	Normal Grab Sample	p,p'-DDT	None		µg/L	Sample preparation date was 01/01/1950.Digest extraction method was EPA 3510C. Extraction date was 05/19/2003.	Compliant with associated QAPP
Surface Water Ambient Monitoring Program	State Water Resources Control Board	9100TPOG3	Poggi Creek 3	05/15/2003	9:30	Matrix Spike/Matrix spike duplicate	p,p'-DDT	None	0.0204	µg/L	Expected Result 0.02. Sample preparation date was 01/01/1950.Digest extraction method was EPA 3510C. Extraction date was 05/19/2003.	Compliant with associated QAPP