

From: Joe Karkoski
To: Craig J. Wilson; Laura Sharpe
Date: 3/4/02 1:03PM
Subject: New 303(d) Listings for Unknown Toxicity in Putah Creek

Craig,

I talked to Jerry about the recommended new listings for upper and lower Putah Creek for unknown toxicity. We would understand if you felt, based on the requirements in the federal regulations, that you could not concur with our recommendations.

As we discussed, the information that we had available to us did not allow us to identify the specific pollutants causing toxicity, and, therefore, non-attainment of our narrative toxicity objective. We do feel that the upper and lower Putah Creek should be given a high priority on a watch list to identify the cause of the toxicity.

I appreciate your giving me a call to discuss this issue.

Joe

CC: Gene Davis; Jerry Bruns

From: Tim Stevens
To: Carpenter, Angela
Date: 2/26/02 8:53AM
Subject: Don't Shoot the Messenger

Hi Angela,

As you know, Craig Wilson's staff is reviewing RWQCB 303(d) List recommendations. I need your further help, specifically with **Attachment 4** of your Staff Report package.

Along with other factors (e.g., QA/QC plan) I/we are using an unofficial "weight of evidence" violation proportion trigger of approximately >10% for water chemistry. You folks used >50%, I believe.

I'd like to find out exactly **what Region-3 water bodies** (from Attachment 4, or other sources, if appropriate) **had violations of >10%**. (There would still have to be good QA/QC, appropriate methodology, etc.) In particular, **which of the 17 additional Santa Barbara County beaches** would qualify (under the >10% criterion)? Assuming that some qualify, I'll need the additional information for them.

Let's discuss this further. I'll call in a day or so.

Included below is a message I sent to the Colorado River Basin RWQCB (Attachment 1) after a critique of my draft Region-7 spreadsheet. I suspect that DWQ managers will ask for more info. If we can supplement any of the "unknowns" (e.g., point out what I missed in the staff report package) in the Region-3 spreadsheet (see Attachment 2), that would be helpful.

Thanks a bunch (and, sorry).

Tim
916/341-5911

CC: McCann, Lisa; Wilson, Craig J.

✓

From: Tim Stevens
To: Zeywar, Nadim
Date: 2/22/02 3:42PM
Subject: CRB-RWQCB 303(d) List Recommendations

Hi Nadim,

I need your help. I've completed a preliminary review of Region-7's recommendations. Here's some background before I call next week to discuss additional information needed to complete my assignment.

<Comments/questions based on data sheets you supplied are included in blue.>

To help review RWQCB 303(d) List recommendations, SWRCB staff is using a spreadsheet and evaluation criteria designed by Craig Wilson (see **DRAFT** spreadsheet for Region 7, [Attachment 1](#)). To complete the spreadsheet and make my own recommendations, I need the following information used to make Region-7's listing/de-listing decisions:

1. Extent to which data quality requirements are met

What kind of monitoring/sampling program was used? Was it a well-known well-respected outside program/agency like SCCWRP, USGS, USEPA, SFEI, BPTCP, etc. whose methods are impeccable? Was it RWQCB sampling? Was it citizen monitoring? Who (e.g., what lab) analyzed the data? Most important, **is there a QA/QC program plan available** to the RWQCB/SWRCB to review and enter into the record? If data were collected by, for example, citizen monitoring or other groups, were standard protocols and **QA/QC** requirements followed? The same applies to any lab analyzing the data.

You've supplied RWQCB data for the New River. Is there a QA/QC plan available? Are there standard protocols used? Where were the samples analyzed?

I think I found the answer: DHS, correct? That helps, because DHS will use standard lab protocols. But we should/(must) have that information available for the record.

2. Linkage between measurement endpoint and beneficial use or standard

Is the standard, objective, criterion, or guideline representative of the beneficial use? A classic bad example we have (from another RWQCB) is the attempted use of **MTRLs** (a human health guideline) for impairment of an aquatic habitat beneficial use (like **WARM**).

What standard was used to evaluate the data? I assume it was Basin Plan objectives, but that is not clear to me. **NOTE:** If I didn't know the specific beneficial use(s) of concern, I had to put an "unknown" in the spreadsheet. I can't assume or guess, even using your Basin Plan.

3. Correlation of stressor to response

Any legitimate Basin Plan WQ objective, CTR criterion, or NTR criterion is totally acceptable. Other "standards/guidelines" are judged more critically.

4. Utility of measure for judging if standards or uses are not attained

NAS, USFDA, USEPA, MCLs, fish advisories, BPTCP approaches, (county) beach closures, published temperature thresholds, DHS bacterial standards, DFG guidelines, etc. will receive high marks. The scientific basis for the standard will be evaluated, so **we need to know what standard of evaluation was used by you to judge the data.**

5. Water Body-specific Information

- a. How old are the data?
- b. Was data measured at the site or in the water body?