



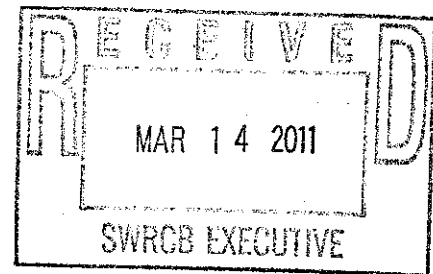
Public Comment  
SQO Amendments  
Deadline: 3/15/11 by 12 noon

## THE CITY OF SAN DIEGO

March 14, 2011

VIA EMAIL TO: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> floor  
Sacramento, CA 95814



Dear Ms. Townsend:

Subject: Comment Letter - Sediment Quality Objectives, Part 1, Amendment

The City of San Diego, Transportation & Storm Water Department (City) appreciates the opportunity to provide comments regarding the proposed Sediment Quality Objectives, Part 1, Amendment (SQOs). We applaud the State Water Resources Control Board (SWRCB) for its continued development of the SQOs, which are essential for consistent implementation across California.

The City supports the inclusion of narrative SQOs, Section IV.C, for wildlife and resident finfish. However, we do not support Sections VI.A and VI.B as these sections do not provide a concise process for evaluating human health and wildlife risk. If the intent of these sections is to confirm that the established process for evaluating human health and wildlife\ resident finfish risk will remain unchanged, please clearly state. If the guidance provided in this section deviates from the current human and wildlife health evaluation guidance, please provide more detail on how a case-by-case assessment would be implemented. For example, Section VI.A states that the "narrative human health objective... shall be implemented on a case-by-case basis, based upon a human health risk assessment." It is unclear which agency decides that a human health risk assessment must be conducted, or what criteria are considered when determining if a risk assessment must be conducted.

The following comments refer to typographical errors and omissions. The Draft Staff Report Substitute Environmental Document for Proposed Amendments to the Water Quality Control Plan for Enclosed Bays and Estuaries – Part 1 Sediment Quality for the Protection of Fish and Wildlife, Section 1.1 states that "corrections to PAHs, DDD, DDE, and DDT values applied to the Chemical Index Score contained in Table 7 of Part 1."

**Transportation & Storm Water Department**

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The table referred to is actually Table 6 in Appendix A. Please update the text. Additionally, changes were also made to Zinc in the referenced table, which need to be updated accordingly. If this amendment is meant to rectify either typographical errors or omissions, it is not clear why changes to the Disturbance Categories were made. The existing Disturbance Categories matched the Southern California Coastal Water Research Project (SCCWRP) 2009 Report entitled "Sediment Quality Assessment Draft Technical Support Manual" (Draft Technical Support Manual). Please provide the rationale for revision of the Disturbance Categories, or provide a reference where the information explaining the revision can be found.

Corrections to the chemical list described in Part 1, Attachment A are proposed in this amendment. Based upon review of U.S. Environmental Protection Agency's (EPA) document (EPA/600/P-96/001F) *PCBs: Cancer Dose - Response Assessment and Application to Environmental Mixtures, Table 3-3*, it appears that some congeners in Attachment A are not consistent. Six congeners listed in Attachment A were not listed in the EPA document; however, another six congeners listed in the EPA document only differed by one digit. For example 2,3,4,2',4',5'-hexachlorobiphenyl was not listed in the EPA document, but 2,3,4,3',4',5'-hexachlorobiphenyl was listed as Not Abundant in Environmental Samples, but Toxicologically Active category. To ensure consistent implementation, we recommend verifying the congeners between the SQOs, the EPA document, and the SCCWRP 2009 Draft Technical Support Manual.

Thank you for the opportunity to comment on the Sediment Quality Objectives Amendment. Please feel free to contact Ruth Kolb at (858) 541-4328 if you have any questions or would like to discuss this further.

Sincerely,



Kris McFadden  
Deputy Director

KM:rk

cc: Brent Eidson, Water Policy Advisor, Office of Mayor Jerry Sanders  
Garth K. Sturdevan, Interim Director, Transportation & Storm Water Department  
Ruth Kolb, Program Manager, Transportation & Storm Water Department  
Edith Gutierrez, Associate Planner, Transportation & Storm Water Department