



# California Regional Water Quality Control Board

## Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

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Arnold Schwarzenegger  
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April 24, 2007

Richard Hajas  
Calleguas Creek Watershed Management Plan  
Water Quality/Water Resources Subcommittee  
2100 Olsen Road  
Thousand Oaks, California

Monitoring and Reporting Program Plan and Quality Assurance Project Plan for the Nitrogen, OC and PCBs, and Toxicity TMDLs

Dear Mr. Hajas,

Thank you for the submission of the Monitoring and Reporting Program Plan (MRP) and Quality Assurance Project Plan (QAPP) for the Nitrogen, OC and PCBs, and Toxicity TMDLs on September 26, 2006 in compliance with the Calleguas Creek Watershed Nitrogen, OC and PCBs, and Toxicity TMDLs. Regional Board staff has reviewed these documents and generally agrees with the approach outlined in the MRP and the QAPP. However, please revise and or provide a response to the following comments:

- Sediment testing for selenium should be added to the list of metals to be tested in Mugu Lagoon (Table 2, page 11)
- The underlined language below should be added to the Special Studies section on page 13: "...No specific special studies are incorporated into the QAPP at this time; however, a summary of special studies that may be incorporated at a later date are provided below. Work plan for specific special study shall be submitted to the Regional Board for approval. Additional special studies may be added as other TMDLs are completed (e.g., metals, salts, and bacteria) or developed through other processes."
- Include the CAS No. for each sample as part of the analytical data reports (page 15).
- Two additional wet weather sampling events should be done at all sites except for POTWs' discharges as they were not identified as major sources of constituents identified in the TMDLs. If the changes can not be made please provide an explanation why additional wet weather sampling events are not included for these specific sites.
- Toxicity testing should be monitored for Beardsley Wash (Reach 5) as it is impaired for toxicity.
- Reaches 9A and 10 have various tissue impairments. Therefore, tissue testing should be included for Reaches 9A and 10.

**California Environmental Protection Agency**

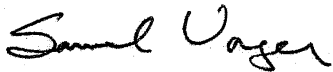
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- Under bullet one on page 45, it is suggested to put the bubbled wrapped bottles and or containers into re-sealable bags before placing them in the ice chest.
- The project reporting limits listed in Table 13 for total suspended solids, and Nitrate – N are higher than those listed in the SWAMP QAPP. Please provide an explanation and or change the reporting limits to reflect those listed in the SWAMP QAPP template of:
  - Total Suspended Solids - 0.5 mg/L
  - Nitrate–N - 0.01 mg/L
- The analytical methods for pyrethroid pesticides are not listed in Table 13 on pages 49 and 51. Please specify these methods and or provide detailed information the GCMS alternate test procedure.
- The following pesticides listed in Table 9 Aldrin, alpha-BHC, Chlordane-alpha, Chlordane-gamma, 4,4'-DDD, 4,4'-DDE, 4,4'-DDT, Dieldrin and Toxaphene have the MDL or RL higher than the assigned WLAs and LAs, please provide an explanation for this.
- Paragraph 6 on page 68 of the Assessments and Response Action should be revised to read as follow: If a coordinated and comprehensive monitoring plan that address multiple regulatory requirements (i.e., TMDL, NPDES, Ag Waiver, etc.) is developed, and meet the goals of this monitoring plan, and approved by the Executive Officer, that plan should be considered as a replacement for the CCWTMP.
- In reviewing the Toxicity Testing and Toxicity Identification Evaluations section of the QAPP it was noted that the procedures described differ from the procedures proposed in the Conditional Waiver for Agricultural Dischargers. Please provide rationale demonstrating that the procedures proposed in the CCWMP QAPP are equivalent to the procedures specified in the Conditional Waiver.
- Regional Board staff is specifically concerned that the 50% mortality endpoint for TIE initiation, which is based on acute toxicity methods, does not reflect the same endpoint sensitivity as established in the waiver by the use of TU<sub>c</sub> units. This unit of the toxicity water quality benchmark set in the Conditional Waiver integrates chronic toxicity endpoints; it is important that the sensitivity of this endpoint be conserved.
- The approach section of the MRP states an effort to coordinate monitoring between the Calleguas Creek Watershed TMDL monitoring and the Conditional Waiver monitoring in the Calleguas Creek Watershed. Please clarify how data will be used and/or shared between these two monitoring programs and specifically identify sites that correspond between the two programs.

- Paragraph six on page 53 discusses the decision to initiate TIE procedures. Please state that Regional Board staff will participate in consultation with the Project Manager and the toxicity laboratory on the decision to initiate TIE procedures.

Your consideration of these comments is appreciated. Please contact me (213)567-6622, or Thanhloan Nguyen (213)576-6690 if you have any questions or would like to schedule a meeting to discuss these comments.

Sincerely,



Samuel Unger, P.E.  
Section Chief – Regional Programs