



DEPARTMENT OF THE NAVY
 COMMANDER NAVY REGION SOUTHWEST
 937 NO. HARBOR DR.
 SAN DIEGO, CALIFORNIA 92132-0856

IN REPLY REFER TO:
 5090
 Ser N45JCR.bg/0055
 January 31, 2006

Selica Potter, Acting Clerk to the Board
 State Water Resources Control Board
 1001 I Street, 24th Floor
 Sacramento, CA 95814



303 (d) Deadline:
 1/31/06

Dear Ms. Potter:

Subject: Proposed 303(d) Listing of Entire San Diego Bay for
 Polychlorinated Biphenyls (PCBs)

The purpose of this letter is to express the Navy's concern over the proposed listing of the entire San Diego Bay as a PCB impaired water body within the Clean Water Act Section 303(d) list for PCBs.

The proposed listing of San Diego Bay as a PCB impaired water body appears to be based on the results from a report entitled "Prevalence of Selected Target Chemical Contaminants in Sport Fish from Two California Lakes: Public Health Designed Screening Study." This report presents a fish tissue "screening level" for additional sampling for PCBs at a water body as 20 ppb. This "screening level" is not consistent with any government adopted regulations, standard, guideline or advisory.

Additional sediment sampling data, not considered by the board, is available from the Southern California Bight 1998 Regional Monitoring Program, the 2001 Mouth of Chollas Creek and Mouth of Poleta Creek TMDL Studies, and the 2001 NASSCO and Southwest Marine Sediment Investigation. Analysis of the data from this sampling pool shows background levels for PCBs averaging 84 ug/kg. This level is dramatically below the PCB sediment guideline values in the State Water Board's Listing Guidelines, which range from 400 to 676 ug/kg.

It is the Navy's position that inclusion of the San Diego Bay in the Clean Water Act Section 303(d) list for PCBs is premature in that all available evidence has not been considered. After considering all relevant evidence, the 303(d) list should only include those portions of the bay where water quality standards are not being met. It is inappropriate to include an entire water body without evidence that such a

5090

Ser N45JCR.bg/0055

January 31, 2006

listing is warranted. By listing only those segments of the bay where there are impacts, it allows limited resources to be focused on the areas in the bay where actual problems have been identified.

If you have further questions regarding this issue please feel free to contact Mr. Rob Chichester from my staff at (619) 524-6417 or myself at (619) 524-6390.

Sincerely,



BRIAN S. GORDON

Director, Compliance and
Technical Division

By Direction of the Commander