

Public Works Department • Wastewater Division 6001 South Perkins Rd. • Oxnard, CA 93033-9047 • (805) 488-3517 • Fax (805) 488-2036

January 6, 2006

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



Subject: REVISION TO FEDERAL CLEAN WATER ACT SECTION 303(d) LIST OF WATER QUALITY LIMITED SEGMENTS

Dear Ms. Potter:

We have received the Notice of Public Workshops for Revisions to the Federal Clean Water Act Section 303(d) List of Water Quality Limited Segments. Following discussions with Regional Board staff, we have identified the following listings that should be revisited:

- ❖ Channel Islands Harbor listed for lead and zinc in sediment from nonpoint sources. We understand that this listing was based on a single Bay Protection and Toxic Cleanup Program (BPTCP) sample 13 years ago. At that time, the BPTCP document said that since Channel Islands Harbor "had relatively undegraded benthos and few chemicals at elevated concentration it might also serve as a potential reference site". Although the 303(d) lists the source as nonpoint, we feel that the elevated levels found were due to an NPDES permitted discharge from a boat repair facility that has since been allowed connection to our WWTP collection system, following extensive pretreatment. Since the listing was based on a single, old, sediment sampling event that did not show excessive levels of lead and zinc, we feel that it is appropriate to de-list this waterbody.
- ❖ Calleguas Creek Reach 5 (formerly Beardsley Channel) listed for (among others) ChemA, chlordane, chlorpyrifos, DDT, dieldrin, endosulfan, and toxaphene in fish tissue. There has been no TSM monitoring in Beardsley Channel according to the State's database, and the listing seems to be an extension of impairments found in the lower watersheds. This was not the intention of the Listing Policy. Although the City supports the use of TSM and Mussel Watch for long-term trend analysis of pollutants that are not measurable in the water column, we believe this waterbody was listed in error and recommend de-listing.

O Transference i se englikarni sengelak mengelak mengengak tinggangkanan pangkaban segara sengelak tingga. Penghinan selah sebagai kelalah selah selah sebagai sebagai sebagai sebagai sebagai sebagai sebagai sebagai se Thank you for the opportunity to review the draft 303(d) listings. Please feel free to call me at (805) 271 – 2205 if any clarification is required, or ask your staff to contact Mark Pumford, Technical Services Manager, at (805) 271 - 2220.

Sincerely,

Mark S. Norris

Wastewater Superintendent

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