



PALO VERDE IRRIGATION DISTRICT

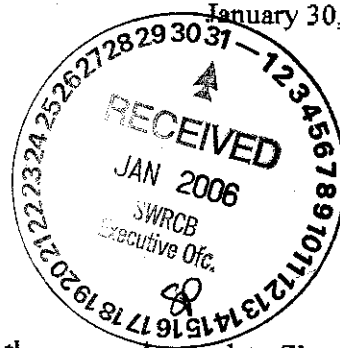
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Mr. Craig J. Wilson
Chief, TMDL Listing Unit
Division of Water Quality
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

RE: Comment on 2006 Section 303 (d) List Update

Mr. Wilson:



303 (d) Deadline:
1/31/06

Thank you for extending the comment period on the proposal to update Clean Water Act Section 303 (d) List for 2006. PVID maintains a system of open gravity flow drainage channels to control ground water levels under 104,500 acres of farmland and developed areas. All but one of those drains flows into our Palo Verde Outfall Drain. This drain is not a freshwater facility so drinking water standards should not be used.

PVID hereby requests the proposal to place Palo Verde Outfall Drain, # 71540000 in Region 7 on the 303 (d) list for DDT be reconsidered. The 4,392 page report on your website has no new data on DDT in this drain since 2002. In Volume III, page 71 of Fact Sheets Supporting ... for Region 7, justification for placing this Drain on the Listing

“One line of evidence is available in the administrative record to assess this pollutant. Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification in favor of placing ...”

How can one line of evidence be considered readily available data ... sufficient.... for this position? The 4 samples that exceeded the OEHHA Screening Value were taken between 1992 and 1995, over 10 years ago. The data from 1996 to 2002 decreased from less than 50 ng/g to 14.3 ng/g in 2002, below various action levels.

DDT's use was banned in California in 1972. Based on internet information: 1) the biological half life of DDT is about 8 years, that is, it takes about 8 years for an animal to metabolize half the amount it assimilates in fatty tissue, and 2) in most soils, it has a half life in the environment of 2 to 15 years. None of the published DDT data from samples for this drain from 1987 to present (14 dates) exceeded FDA Action Levels. None of the published DDT data from samples for this drain from 1987 to present (14 dates) exceeded the National Academy of Science criteria.

It would seem that in the 33 years since its use was banned, with PVID's routine drain maintenance activities, DDT would naturally be reducing its concentration in the drain sediments so that a TMDL is not needed. This drain is being sampled by various government, health and environmental agencies. Since there are no reported samples of DDT in this drain since 2002 in your report, perhaps its levels have dropped below action levels and were not reported. The most recent data, after 1995, shows amounts of DDT to be dropping toward or below non action levels. I can see no reason for that trend to change since DDT is no longer used. Now, one could reasonably assume that the DDT levels are still below action levels if new current data were obtained.

PVID and its water users have implemented and will continue to implement, to the maximum extent practicable, cost effective management practices to prevent sediment from being discharged into the drainage system and Outfall Drain. Most farm fields have been dead leveled so there is no surface runoff into the drain system. All the management practices implemented and natural processes have already dropped DDT levels almost 7 times below the OEHHA Screening Value, so a TMDL is not needed.

Thank you for your time on this issue. If you have any questions, please call me.

Sincerely,
Roger Henning
Roger Henning
Chief Engineer