

LEHR Superfund Site Constituents of Concern
March 19, 2009

Julie Roth, Executive Director DSCSOC

Reflecting on our discussions on the comment by David Cooper that Richard Muza and Claire Trombadore informed him that mercury is not a Constituent of Concern at the LEHR Superfund site, it appears that Mr. Muza and Claire Trombadore only examined the Constituents of Concern for groundwater. Mercury is not a Constituent of Concern for groundwater. Also the concentrations in the LEHR surface soils are not above regulatory limits. However the stormwater runoff from LEHR contains sufficient mercury to violate US EPA Clean Water Act (CWA) limits for a NPDES permitted discharge to a water quality limited waterbody based on excessive concentrations of mercury in Putah Creek water and some fish. As repeatedly discussed in DSCSOC reports at,

<http://www.gfredlee.com/dscsoc/doc.htm> that have been issued since the late 1990s this means that the concentrations of mercury in stormwater runoff must be controlled to not exceed the US EPA California Toxic Rule (CTR) of 50 ng/L. Repeatedly, the stormwater runoff at LEHR has been found to exceed 500 ng/L and therefore is contributing to the excessive bioaccumulation of mercury in Putah Creek.

In accord with CWA requirements, the CVRWQCB as part of being a RPM at LEHR, has ordered UCD to implement BMPs to control the mercury in the LEHR site stormwater runoff to not exceed the CTR criterion. Therefore mercury is a Constituent of Concern at LEHR in stormwater runoff from LEHR. It appears that Richard Muza was not aware of this issue in his assessment of Constituents of Concern at LEHR.

If there are questions on this matter please contact me.

Fred
G. Fred Lee & Associates
27298 E. El Macero Drive
El Macero, CA 95618
gfredlee@aol.com