

LEHR Group

I am forwarding Dr. G. Fred Lee's comments regarding Putah Creek and Dr. Moyle's presentation at the recent Putah Creek Council meeting.

If you have any questions, please contact him.

Julie Roth  
Executive Director  
DSCSOC

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Forwarded Message:

Subj: **UCD Draft Risk Assessment**  
Date: 4/28/2003 5:15:14 PM Central Daylight Time  
From: [Gfredlee](#)  
To: [JRoth916](#)

Julie Roth, Executive Director  
DSCSOC

Julie,

Previously UCD, in its draft risk assessments, has attempted to use the elevated flows of Putah Creek arising from the litigation settlement with the Solano Irrigation District as the dilution water available for diluting any runoff from the LEHR site. I have commented that that approach is inappropriate and that those flows may not be available in drought conditions, with the result that the actual dilution available for diluting initial runoff from the LEHR site during a stormwater runoff event may be much less than that being used by UCD in its risk assessment.

Recently I attended a Putah Creek Council organized lecture by Dr. Peter Moyle devoted to "Return of the Natives: Putah Creek Fishes." One of the topics that was discussed in the question and answer period was what the situation would be with respect to flows in Putah Creek when a drought like that which occurred in the late 1980s/early 1990s occurs again. Dr. Moyle indicated that under drought conditions, Solano Irrigation District gets first call on the water, and that again, Putah Creek could be dried up with respect to all dilution flow. The net result is that there could be only UCD sewage discharge flow adjacent to the LEHR site during the early part of a rainfall runoff event from the LEHR site.

As you may recall, when ATSDR did its first mercury in fish studies, which were the result of DSCSOC's requesting that the RPMs have studies of this type conducted, since there was no information on bioaccumulation of chemicals that are present at the LEHR site in Putah Creek fish, this was in a drought period, where there was low flow in Putah Creek upstream of the UCD sewage plant discharge. The fish taken from near the discharge had greatly elevated concentrations of mercury, including radioactive mercury, which was likely derived from the UCD campus, through its sewage plant discharge.

As I have commented previously, UCD's proposed approach for evaluating the impacts of constituents in stormwater runoff from the LEHR site based on dilution in Putah Creek is not a technically valid approach. However, any discussion of this approach must consider worst-case conditions of no flow in Putah Creek other than that from the UCD sewage treatment plant.

If there are questions on this matter, please contact me. I suggest you pass this on to the RPMs and PRPs for the LEHR Superfund site.

Fred