

Comments on
University of California Davis Spring Quarter 2004 Water Monitoring Report
submitted by
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Julie Roth,

I have reviewed the University of California Davis Spring Quarter 2004 Water Monitoring Report. My comments on this report are presented below.

Overall

Overall this report suffers from the same deficiencies that DSCSOC has repeatedly commented on over the past 15 years that we've been involved in reviewing the quality of the work being done by UCD and its contractors in investigating the LEHR Superfund site pollution by UCD derived wastes. UCD is still not developing credible reports that would be accepted by the regulatory agencies in many other situations in which I've been involved. Basically, this report is a presentation of data with essentially no interpretation of the water quality significance of the data collected during the quarter. This approach should not continue to be allowed.

There continues to be a significant problem with contamination of the samples by acetone and possibly toluene. As commented in the past, this situation represents sloppy sample handling by UCD and/or by the laboratory conducting the analyses.

Groundwater Monitoring

With respect to the groundwater quality monitoring program that UCD is allowed to adopt under conditions for DSCSOC was not included in the review of this program, this water quality monitoring program continues to be significantly deficient in several respects. As DSCSOC has repeatedly pointed out, all groundwater measurements at the LEHR site should include down borehole measurements of dissolved oxygen. Also, all groundwater samples should include measurements of TOC. This data is essential to interpreting the characteristics of the groundwaters that are being investigated.

Surface Water Monitoring

With respect to the Appendix D data for metals in the stormwater runoff sample from the winter quarter 2004, there is still the chronic problem of mercury being determined with an inadequate detection limits of 200 ng/L. Further, the finding of 100 ng/L of mercury in stormwater runoff, as reported in Appendix D, means that the stormwater runoff sample contained excessive mercury compared to the California Toxics Rule criteria. The least that should be done in a credible report of the stormwater runoff data is to discuss this situation.

With respect to the Appendix D data for pesticides, UCD is continuing to use the inadequate detection limits to determine the concentrations of pesticides in stormwater runoff that can bioaccumulate in receiving water aquatic life to excessive levels.

Another deficiency with the monitoring of stormwater runoff is that UCD is only using fathead minnows for aquatic life toxicity testing, they should also be using Ceriodaphnia for this testing.

If you have questions on these comments please contact me.

Fred

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