

Review of the June 2005 Draft
“2004 Comprehensive Annual Water Monitoring Report”
for the University of California, Davis LEHR Site
prepared by the University of California, Davis and Brown and Caldwell

Comments Submitted by

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to

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The draft 2004 Comprehensive Annual Water Monitoring Report has many of the same problems that DSCSOC has commented on for other years' reports over the past nine years. Presented below are several particularly significant continuing problems with UCD's monitoring of water quality at the LEHR Superfund site.

Contamination of Sample Containers

At several locations in the Executive Summary as well as the body of the report, mention was made of acetone contamination of samples. As pointed out in previous DSCSOC comments, UCD and the laboratory with which it is working are not adequately and reliably handling the samples. Chronic acetone contamination is indicative of sloppiness in carrying out the monitoring program. The RPMs should require that UCD and its contract laboratory better control their sample-container handling and laboratory handling of samples to eliminate this type of contamination.

IRA Operation Problems

Page 4-4 begins a discussion of the operating problems of the IRA system. On page 4-5 the problems of calcium carbonate precipitation are discussed. As discussed by DSCSOC when the IRA system was first proposed, there will be problems with calcium carbonate precipitation in these waters; these problems can be readily solved and should have been solved years ago through recarbonation of the injected water.

Excessive Mercury in Stormwater Runoff

Data presented in Appendix H table of Metals in Storm and Surface Water show that UCD continues to use an inadequate method for measuring mercury in stormwater runoff. The allowed lower detection limit of 200 ng/L is considerably above concentrations of mercury that can bioaccumulate to excessive levels in some fish, which are on the order of a few nanograms/liter. Finding of mercury at 260 ng/L in the LF-01 sample collected on November 11, 2004 shows that UCD is violating California Toxics Rule criteria for the discharge of

mercury to Putah Creek. This is a chronic problem with UCD that needs to be corrected. DSCSOC has discussed these issues in detail. More reliable and appropriate analytical methods are available; RPMs should immediately require that UCD use these methods to determine the levels of mercury in stormwater runoff. Further, mercury should be made part of the remediation program for stormwater runoff from the LEHR site.