

# Contra Costa Clean Water Program

## Pollutants of Concern Monitoring Report: Accomplishments in Water Year 2021 and Allocation of Effort for Water Year 2022

*Submitted to the San Francisco Bay  
Regional Water Quality Control Board*

*In Compliance with NPDES Permit Provision C.8.h.iv  
Municipal Regional Stormwater Permit (Order R2 2015 0049)  
And as Revised by Amendment Order No. R2 2019 0004*

September 2021



CONTRA COSTA  
**CLEAN WATER**  
PROGRAM

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San Francisco Bay Regional Water Quality Control Board  
In Compliance with NPDES Permit Provision C.8.h.iv  
Municipal Regional Stormwater Permit 2.0 (Order R2-2015-0049)  
and the Central Valley Regional Water Quality Control Board

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## TABLE OF CONTENTS

Table of Contents.....	i
List of Tables .....	ii
List of Figures .....	ii
Acronyms and Abbreviations.....	iii
1 Background .....	1
1.1 Monitoring Goals .....	1
1.2 Dual Regional Water Quality Control Board Jurisdictions .....	3
1.3 Lessons Learned from MRP 1.0 (Order R2-2009-0074) and Water Years 2016-2020 .....	4
2 Monitoring Accomplished in Water Year 2021.....	6
2.1 PCBs and Mercury Screening - Street Dirt and Storm Drain Drop Inlet Sampling in Old Industrial Areas in the City of Richmond .....	9
2.2 Copper and Nutrients Monitoring .....	9
2.3 Mercury and Methylmercury Water Sampling in Lower Marsh Creek – Central Valley Requirement .....	10
2.4 Summary of Monitoring Completed in Water Year 2021.....	10
3 Monitoring Plan for Water Year 2022 .....	14
3.1 Sediment Investigation of Remaining Old Industrial Source Areas .....	14
3.2 Watershed Characterization for Copper and Nutrients .....	14
3.3 Methylmercury Monitoring in Marsh Creek.....	14
3.4 Stormwater Monitoring for PCBs and Mercury by the RMP .....	15
3.5 Summary of Monitoring Planned for Water Year 2022.....	15
4 References .....	16

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## List of Tables

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Table 1.	Sediment Screening Analytical Tests, Methods, Reporting Limits, and Holding Times .....	9
Table 2.	Copper and Nutrients in Water - Analytical Tests, Methods and Reporting Limits .....	10
Table 3.	Mercury and Methylmercury in Water - Analytical Tests, Methods, Reporting Limits, and Holding Times.....	10
Table 4.	Summary of Monitoring Completed in WY 2021 by Pollutant Class, Analyte, Management Information Need, and MRP Targets.....	12
Table 5.	Summary of Monitoring Completed in WYs 2016 through 2021 toward MRP Targets.....	13
Table 6.	CCCWP Monitoring Planned for WY 2022 by Pollutant Class and MRP Targets.....	15

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## List of Figures

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Figure 1.	Location of WY 2021 Monitoring Activities – County Overview .....	7
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## Acronyms and Abbreviations

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BASMAA	Bay Area Stormwater Management Agencies Association
Bay	San Francisco Bay
Bay Area	San Francisco Bay Area
BMP	best management practice
CCCWP	Contra Costa Clean Water Program
CV	Central Valley
Delta	Sacramento-San Joaquin River Delta
EPA	United States Environmental Protection Agency
GI	green infrastructure
LID	low impact development
MeHg	methylmercury
MPC	Monitoring and Pollutants of Concern
MRP	municipal regional stormwater permit
MS4	municipal separate storm sewer system
NPDES	National Pollutant Discharge Elimination System
PCBs	polychlorinated biphenyl congeners
POC	pollutants of concern
PSD	particle size distribution
RAA	reasonable assurance analysis
RMP	Regional Monitoring Program for Water Quality in San Francisco Bay
RWQCB	Regional Water Quality Control Board
SSC	suspended sediment concentration
SWRCB	State Water Resources Control Board
TMDL	total maximum daily load
TOC	total organic carbon
WWTP	wastewater treatment plant
WY	water year

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## 1 BACKGROUND

This report summarizes pollutants of concern (POC) monitoring conducted by Contra Costa Clean Water Program (CCCWP) during water year 2021 (October 1, 2020 through September 30, 2021), and describes POC monitoring to be completed in the coming water year (October 1, 2021 through September 30, 2022). This report fulfills Provision C.8.h.iv of the Municipal Regional Stormwater Permit (MRP 2.0, Order R2-2015-0049) issued in 2015 by the San Francisco Bay Regional Water Quality Control Board (SFRWQCB, 2015). The following subsections describe monitoring goals (Section 1.1), CCCWP's dual jurisdiction between the San Francisco Bay and the Central Valley regional water quality control boards (Section 1.2), and concludes with lessons learned from past years of permit implementation (Section 1.3). Section 2 describes monitoring completed in water year 2021, and Section 3 describes monitoring to be completed in water year 2022.

### 1.1 Monitoring Goals

CCCWP Permittees prioritize monitoring POCs with the goal of identifying reasonable and foreseeable means of achieving load reductions of pollutants required by total maximum daily loads (TMDLs). TMDLs are watershed plans to attain water quality goals developed and established by the San Francisco Bay Regional Water Quality Control Board (SFRWQCB). The two most prominent TMDLs in driving stormwater monitoring, source control, and treatment projects under MRP 2.0 are the mercury TMDL and the polychlorinated biphenyls (PCBs) TMDL. In the interest of protecting the beneficial uses of the surface waters for people and wildlife dependent on San Francisco Bay (the Bay) for food, these regulatory plans are intended to reduce concentrations of mercury and PCBs in fish within the Bay.

Mercury and PCBs tend to bind to sediments. The principal means of pollutant transport from watersheds is via sediments washed into the Municipal Separate Storm Sewer System (MS4); therefore, an important focus of POC monitoring is identifying the most significant sources of contaminated sediments to the MS4. An additional focus is quantifying the effectiveness of control measures. The highest POC monitoring priorities for Permittees are answering these two basic TMDL implementation questions: where are the most significant POC sources, and what can be done to control them?

The SFRWQCB framed those two priority management information needs, along with three others, in the MRP as follows:

- 1. Source Identification** Identify which sources or watershed source areas provide the greatest opportunities for reductions of POCs in urban stormwater runoff.
- 2. Contributions to Bay Impairment** Identify which watershed source areas contribute most to the impairment of San Francisco Bay beneficial uses (due to source intensity and sensitivity of discharge location).

- 3. Management Action Effectiveness** Provide support for planning future management actions or evaluating the effectiveness or impacts of existing management actions.
- 4. Loads and Status** Provide information on POC loads, concentrations, and presence in local tributaries or urban stormwater discharges.
- 5. Trends** Evaluate trends in POC loading to San Francisco Bay and POC concentrations in urban stormwater discharges or local tributaries over time.

Provision C.8.f of the MRP does not specify monitoring details; rather, it requires a total number of samples for different pollutant types to be monitored over the permit term, along with yearly minimum numbers of samples for each POC. The effort is to be applied to the five management information needs listed above.

MRP 2.0 required all stormwater programs to collectively reduce PCBs from stormwater by three kilograms per year (kg/yr) over the permit term<sup>1</sup>. This made management information needs 1 (sources) and 3 (effectiveness) the highest priorities for Permittees to maintain compliance. Part of management information need 2 (watershed areas which contribute most to impairment) is also directly related to achieving load reductions. In order to prioritize management actions, Permittees need to know which specific watersheds or sub-catchments are the greatest density of source areas or average sediment pollutant concentrations.

Other aspects of the five management information needs are not as directly related to complying with the MRP 2.0 PCBs load reduction requirement. Knowing which areas of the Bay are most sensitive (the second part of management information need 2) is interesting from a planning perspective, but MRP2.0 does not require reducing loads to sensitive areas specifically. Likewise, understanding long-term trends of POC concentrations in urban stormwater is important, but short-term actions are a higher priority to comply with the numeric requirements of MRP 2.0 and to make progress toward improving long-term trends. For this reason, the sensitive areas aspect of management information need 2 and the trends analysis in management information need 5 are mostly addressed by funding pilot and special studies implemented by the Regional Monitoring Program for Water Quality in San Francisco Bay (RMP).

Thinking more broadly about management questions helps address multiple questions with the same effort. For example, by identifying specific source areas through management information need 1, the concept emerged that old industrial areas contribute relatively greater amounts of PCBs per unit area. That information is responsive to management information need 2 (areas which contribute the most to impairment). Over time, source area information is aggregated into load estimates, which inform management information need 4 (loads and status). As progress is made on abating source areas and

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<sup>1</sup> This PCBs load reduction requirement was achieved by June 30, 2020.

implementing green infrastructure projects, load reduction information is developed responsive to management information need 5 (trends). The loads and status aspect (management information need 4) involves watershed modeling using monitoring data to estimate current loads of POCs and potential long-term load reductions which may be achieved through source control and stormwater treatment. This addresses long-term planning to understand how implementation of stormwater treatment through green infrastructure<sup>2</sup> leads to attainment of POC load reduction goals.

CCCWP developed a reasonable assurance analysis (RAA) model to forecast attainment of load reduction goals in fulfillment of MRP 2.0 sub-provisions C.11.c., C.11.d., C.12.c., and C.12.d. The countywide RAA for CCCWP permittees within Region 2<sup>3</sup> was submitted to the SFRWQCB with the 2020 Annual Report (Appendix A of Attachment 12.1). The RAA established the relationship between the areal extent of green infrastructure and source control measure implementation and POC reductions, estimated the amount and characteristics of land area to be treated through green infrastructure in future years, and estimated the amount of POC reductions which will result from green infrastructure and source control measure implementation by specific future years. CCCWP started preparation of the countywide RAA in WY 2018, which, in combination with monitoring data, provided information on POCs loads (management information need 4).

In addition to sediment-associated TMDL pollutants, such as mercury and PCBs, Provision C.8.f also requires monitoring of copper, nutrients, and emerging contaminants (e.g., perfluorooctane sulfonates (PFOS) and perfluoroalkyl sulfonates (PFAS) and alternative flame retardants). Copper and nutrients are directly monitored by CCCWP as described in Sections 2 and 3 below. Emerging contaminants are assessed through a regional collaboration with the RMP and, therefore, are not discussed further in this report.

## 1.2 Dual Regional Water Quality Control Board Jurisdictions

CCCWP is in a unique position among Bay Area stormwater programs, as the county is split between the jurisdiction of the San Francisco Bay and Central Valley Regional Water Quality Control Boards (SFRWQCB and CVRWQCB, respectively). In addition to meeting monitoring requirements in the MRP, CCCWP is also required to meet monitoring specifications established in the East Contra Costa County National Pollutant Discharge Elimination System (NPDES) permit (CVRWQCB, 2010) and the 2019 amendment revising the MRP (SFRWQCB, 2019). Monitoring responsive to both permits was coordinated successfully to efficiently achieve required goals. Since the Central Valley Region has been moving toward a regional permit for municipal stormwater, CCCWP requested SFRWQCB and CVRWQCB

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<sup>2</sup> American Rivers defines “green infrastructure” as an approach to water management which protects, restores, or mimics the natural water cycle. Green infrastructure is effective, economical, and enhances community safety and quality of life. It means planting trees and restoring wetlands, rather than building a costly new water treatment plant. Practically, in terms of stormwater management in Contra Costa County, this means requiring all new development and redevelopment projects include stormwater treatment via approved low impact development (LID) designs. These include rain gardens, bioswales, infiltration galleries, etc.

<sup>3</sup> This requirement does not apply to the Cities of Brentwood, Antioch, or Oakley (i.e. “East County Permittees”) as they are not subject to the San Francisco Bay PCBs TMDL. East County Permittees have separate requirements for demonstrating reasonable assurance that Central Valley TMDLs will be achieved.

to consolidate all areas of the county under the MRP administered by the SFRWQCB. CCCWP will continue to be responsive to monitoring requirements established by TMDLs in the Central Valley Region which affect the East County Permittees. The summary of monitoring completed (Section 2) make note, where appropriate, of monitoring information addressing methylmercury in addition to requirements of the MRP.

### **1.3 Lessons Learned from MRP 1.0 (Order R2-2009-0074) and Water Years 2016-2020**

At the advent of MRP 1.0 in 2009 (SFRWQCB, 2009), CCCWP and other BASMAA member agencies had some working knowledge of the distribution of PCBs and mercury loads across the urban landscape. Monitoring studies conducted in the 2000-2002 time frame showed concentrations of PCBs are highest in older industrial areas where PCBs were previously used and released. Mercury is somewhat more evenly distributed across urban land use types (through aerial deposition), with exceptions where known legacy mining sources (e.g., New Almaden) exist upstream. Still, mercury concentrations also tend to be higher in older industrial urban areas, where industrial uses and disposal of mercury occurred in the past. In some places, these early assessments turned up evidence that PCBs in sediments collected from catch basins, curbs, and gutters may be elevated because of release from nearby contaminated properties. Follow-up assessments solidified the evidence of specific source properties in the City of Richmond (within Contra Costa County). Other programs had similar findings of specific source properties. Along with other information, the early studies performed by CCCWP and other BASMAA member agencies were used to develop the mercury and PCBs TMDLs for the Bay.

Source identification work conducted during MRP 1.0 confirmed two private properties in the City of Richmond had consistently high concentrations of PCBs in sediments collected from adjacent curbs, gutters, and catch basins. One of the properties is a metal recycler who previously accepted and recycled used transformers; the other property was a forklift repair shop where hydraulic oil is prevalent<sup>4</sup>. Both properties were referred to the SFRWQCB for remediation and are discussed in the 2014 integrated monitoring report (CCCWP, 2014).

The metals recycler is an active business regulated under the Industrial General Permit (SWRCB, 2015). As a result of CCCWP's source property screening and referral process under MRP 1.0, the property owner is now prohibited from discharging stormwater into the MS4 and has designed an on-site stormwater treatment system. Oversight by the City of Richmond and the SFRWQCB compelled the property owner to implement enhanced operations and maintenance control measures, such as containing stormwater on-site, installing rumble strips to remove dirt from truck tires prior to leaving the site, and conducting enhanced street sweeping with vacuum sweepers. As a follow-up investigation, CCCWP conducted stormwater monitoring in water year 2018 in the public right-of-way. The results help determine that this property is still tracking sediments contaminated with PCBs into the MS4 system. This property was re-referred to the SFRWQCB for enforcement in the annual report for FY 2017-18. The lesson learned from this property is that follow-up sampling is useful to ensure source control measures

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<sup>4</sup> Transformer oil and hydraulic oil are known historic products containing PCBs.

are mitigating pollutants as expected, especially at active businesses. By mitigating releases from this property, the distribution of pollutants by way of runoff, trackout, and windborne dispersion onto surrounding streets is expected to be diminished over time.

Wide-ranging source identification activities produced ten additional source properties for referral to the SFRWQCB during MRP 2.0. There are very few additional large sites which may offer high opportunity for source control. Rather, when screening is complete, CCCWP Permittees would need to wait for high likelihood parcels to change ownership or offer other opportunity for redevelopment in order to gain modest load reductions. This kind of follow-up – to address the gap between cleanup levels directed by Department of Toxic Substances Control and PCBs target levels driven by TMDLs – will be a continuous, adaptive process to gradually reduce the distribution of contaminated sediments around legacy cleanup sites and old industrial areas.

One important lesson learned about monitoring green infrastructure/low impact development (LID) facilities is that more effort needs to be directed toward quantifying exfiltration into the underlying soils (i.e., infiltration). Much of the LID monitoring conducted in MRP 1.0 focused on comparing pollutant concentrations in stormwater flowing into a bioretention facility to concentrations in treated water flowing out of the facility underdrain. This influent-effluent monitoring overlooked the benefit of infiltration, which essentially provides 100 percent pollutant load reduction for infiltrated flows. Monitoring during water year 2017 included water level logging using piezometers deployed across LID facilities at a number of locations throughout the County to better characterize the range of infiltration rates typically achieved. These data will help improve our ability to predict the load reduction benefits of existing and future LID facilities, pursuant to management information needs 3 and 5.

Information about actual and assumed infiltration rates was included in CCCWP's hydromodification technical report (CCCWP, 2017). The technical report was provided to SFRWQCB staff for their consideration, with the goal of supporting reasonable sizing factors for facilities to attain hydromodification management criteria. The CCCWP RAA modeling methodology for quantifying the pollutant loads reduced by green infrastructure projects considered these findings.

CCCWP monitored the Marsh Creek watershed for mercury and methylmercury with an interest in understanding whether stormwater discharges from the historic Mount Diablo mercury mine in the upper watershed reach the Sacramento-San Joaquin River Delta (Delta) and San Francisco Bay. This activity is responsive to management information needs 1, 2, 4, and 5. A lesson learned during MRP 1.0 was that high frequency monitoring biased results toward smaller storms, while upper watershed flow is trapped behind the Marsh Creek Reservoir. Marsh Creek monitoring was amended to focus on large storms. The first storms in many years large enough to convey upper watershed flow to lower Marsh Creek occurred in water year 2017 and were successfully sampled. This monitoring also supported information needed for the methylmercury control study required by the Delta Methylmercury TMDL.

## 2 MONITORING ACCOMPLISHED IN WATER YEAR 2021

During water year 2021, monitoring activities were performed with respect to goals established at the conclusion of the previous water year, as outlined in the POCs monitoring report for water year 2020 (CCCWP, 2020). For each activity, the associated management information need is identified from among the following:

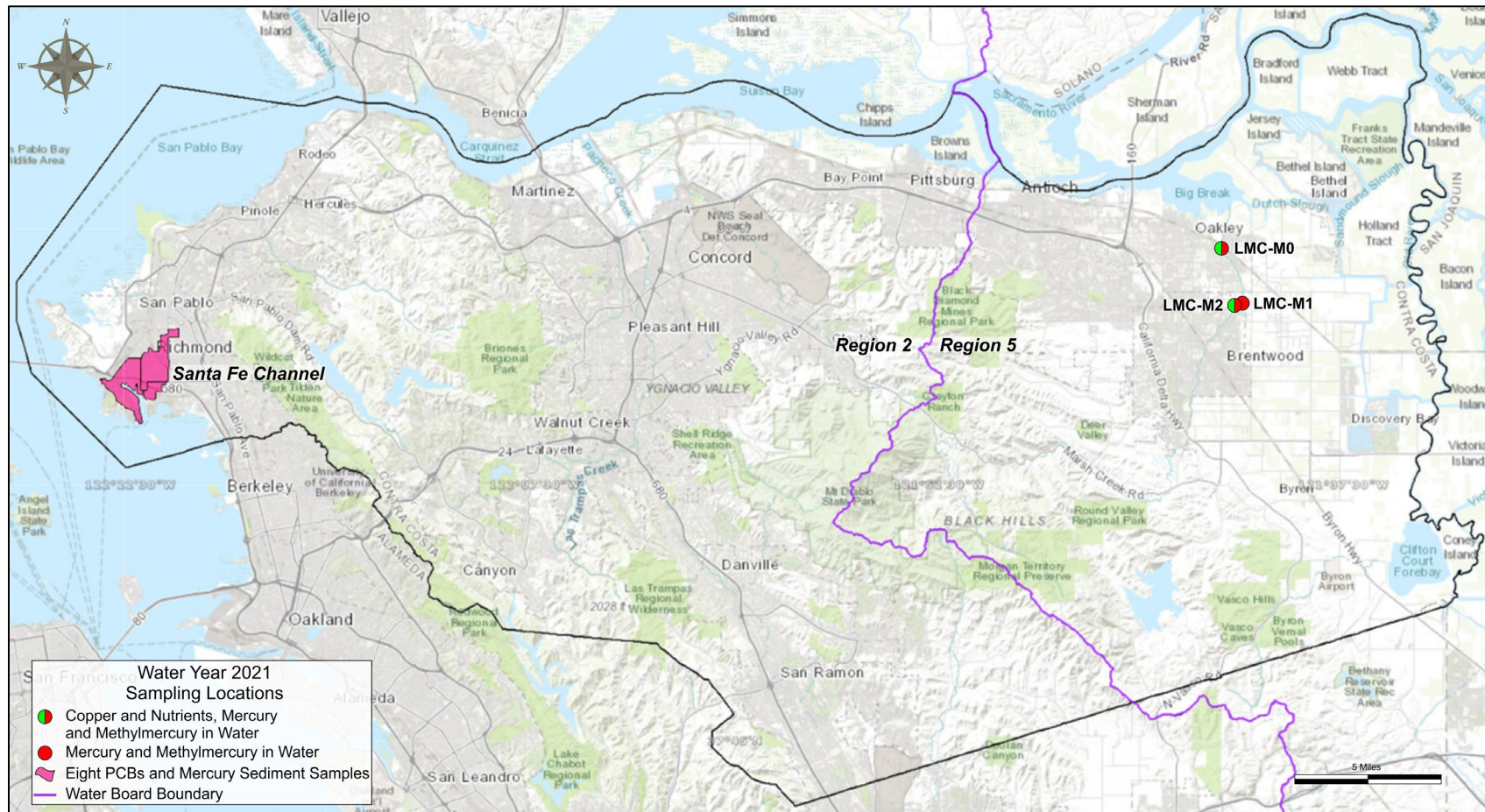
1. Source identification
2. Contributions to Bay impairment
3. Management action effectiveness
4. Loads and status
5. Trends

Monitoring activities in water year 2021 are summarized below and discussed in greater detail in the following subsections:

- PCBs and mercury screening - street dirt and storm drain drop inlet sampling was conducted at eight locations adjacent to suspected source properties in old industrial areas of the Santa Fe Channel watershed (management information needs 1, 2, and 3).
- Copper and nutrients water sampling was conducted in lower Marsh Creek (management information needs 1, 2, 4, and 5).
- Mercury and methylmercury water sampling was conducted in lower Marsh Creek (management information needs 1, 2, 4, and 5, specific to East County Permittees).

Refer to Figure 1 for the location of each monitoring activity.

Figure 1. Location of WY 2021 Monitoring Activities – County Overview



## 2.1 PCBs and Mercury Screening - Street Dirt and Storm Drain Drop Inlet Sampling in Old Industrial Areas in the City of Richmond

Eight composite samples of street dirt and/or storm drain drop inlet sediment in the public right of way are scheduled for collection in September 2021. Sampling sites were selected from a GIS layer that was prepared by CCCWP’s C.11/C.12 technical support contractor, Geosyntec Consultants, that identifies remaining old industrial properties throughout the county that may not have been thoroughly investigated in the past, and that may have the potential to contribute PCBs to the public right-of-way and the MS4. In generating the property database, careful consideration was given to the historic land use of each property and to results of previous monitoring efforts.

Refer to Table 1 for sediment sample test methods, reporting limits, and holding times. Results from water year 2021 monitoring are not yet available.

Sediment Analytical Test	Method	Target Reporting Limit	Holding Time
Total PCBs (RMP 40 congeners) <sup>1</sup>	EPA 8082A	0.5 µg/kg	1 year
Total Mercury	EPA 7471B	5 µg/kg	1 year
Total Organic Carbon	ASTM D4129-05M	0.05%	28 days
Particle Size Distribution <sup>2</sup>	ASTM D422M	0.01%	28 days

1 San Francisco Bay RMP 40 PCB congeners include PCB-8, 18, 28, 31, 33, 44, 49, 52, 56, 60, 66, 70, 74, 87, 95, 97, 99, 101, 105, 110, 118, 128, 132, 138, 141, 149, 151, 153, 156, 158, 170, 174, 177, 180, 183, 187, 194, 195, 201, and 203.

2 Particle size distribution by the Wentworth scale, with percent fines (slit and clay) < 62.5 microns.

## 2.2 Copper and Nutrients Monitoring

Sampling for copper and nutrients will be conducted in lower Marsh Creek in September 2021 in association with a dry weather flow event. The first of two samples will be collected at or near the source of the dry weather flow. Quasiperiodic dry weather flows are common in lower Marsh Creek in September, typically associated with the discharge of irrigation water, though other dry weather flow sources may exist. The second sample will be collected at the furthest downstream monitoring station on Marsh Creek, Station LMC-M0. This station is located just upstream of tidal influence, approximately 2.25 river miles downstream of the Brentwood wastewater treatment plant (WWTP) outfall (Figure 1).

Samples will be filtered in the field within 15 minutes of collection for dissolved copper, ammonia, nitrate, nitrite, and orthophosphate. Refer to Table 2 for test methods and reporting limits. Results from water year 2021 monitoring are not yet available.



**Table 2. Copper and Nutrients in Water - Analytical Tests, Methods and Reporting Limits**

Analytical Test	Method	Target Reporting Limit
Suspended Sediment Concentration (SSC)	ASTM D 3977-97B	3 mg/L
Copper, total recoverable and dissolved	EPA 200.8	0.5 µg/L
Hardness	SM 2340C (titration)	5 mg/L
Ammonia as N	SM 4500-NH3 C v20	0.1 mg/L
Nitrate	EPA 300.0	0.05 mg/L
Nitrite	EPA 300.0	0.05 mg/L
Total Kjeldahl Nitrogen	SM 4500 NH3-C	0.1 mg/L
Dissolved Orthophosphate	SM 4500P-E	0.01 mg/L
Total Phosphorus	SM 4500P-E	0.01 mg/L

### 2.3 Mercury and Methylmercury Water Sampling in Lower Marsh Creek – Central Valley Requirement

Mercury and methylmercury sampling will be conducted concurrent with copper and nutrient sampling on Marsh Creek during a dry weather flow event in September 2021. This work builds on results of the Methylmercury Control Study Final Report (CCCWP, 2018), and should help to better understand mercury concentrations and methylation occurrences within lower Marsh Creek. Samples will be collected at three locations: Station LMC-M2, Station LMC-M1, and Station LMC-M0. Station LMC-M2 is located immediately upstream of the Brentwood WWTP outfall, and Station LMC-M1 is located immediately downstream of the WWTP outfall (Figure 1). As eight samples are required for mercury and methylmercury, up to two separate dry weather flow events will be targeted for sampling.

This monitoring effort satisfies Central Valley requirements of the recently promulgated MRP Amendment Provision C.16.5.g for eight samples within lower Marsh Creek each year (SFRWQCB, 2019). Refer to Table 3 for test methods and reporting limits. Results from water year 2020 monitoring are not yet available.

**Table 3. Mercury and Methylmercury in Water - Analytical Tests, Methods, Reporting Limits, and Holding Times**

Sediment Analytical Test	Method	Target Reporting Limit	Holding Time
Total Mercury	EPA 1631E	0.5 ng/L	90 days
Total Methylmercury	EPA 1631	0.05 ng/L	90 days
Suspended Sediment Concentration	ASTM D 3977-97	1.5 mg/L	7 days

### 2.4 Summary of Monitoring Completed in Water Year 2021

Water year 2021 monitoring is summarized in Tables 4 and 5. The tables list the total number of tests completed for each pollutant class and analyte, the corresponding management information needs addressed, and the target number of tests outlined in the MRP.

The number of samples collected and analyzed in water year 2021 met the minimum annual requirements of the MRP in all pollutant categories. The cumulative number of samples during water years 2016 through 2020 met the requirements of the MRP 2.0 5-year permit term.

The complete results of water year 2021 monitoring will be reported in an appendix to the Urban Creeks Report due on March 31, 2022, and will help inform water year 2022 sampling efforts.

**Table 4. Summary of Monitoring Completed in WY 2021 by Pollutant Class, Analyte, Management Information Need, and MRP Targets**

Pollutant Class / Type of Monitoring	Analyte									Management Information Need					Agency or Organization Performing the Monitoring	Number of Samples Collected and Analyzed in WY 2021	Cumulative Number of Samples Collected and Analyzed In WYs 2016 through 2021	Total Number of Samples Required By the MRP for 5 Year Term, Plus 1 Additional Year
	PCBs	Mercury	Methylmercury	SSC	PSD	TOC	Copper <sup>1</sup>	Hardness	Nutrients <sup>2</sup>	Source ID	Bay Impairment	Management Action	Loads & Status	Trends				
PCBs - sediment	✓				✓	✓				X	X	X			CCCWP	8 <sup>a</sup>	101	88
Mercury & MeHg - water		✓	✓	✓						X	X	X	X	X	CCCWP	8 <sup>b</sup>	151	88
Mercury - sediment		✓			✓					X	X	X			CCCWP	8 <sup>a</sup>		
Copper - water							✓	✓		X	X		X	X	CCCWP	2	22	22
Nutrients - water								✓		X	X		X	X	CCCWP	2	22	22

1 Total and dissolved fractions of copper

2 Nutrients include: ammonia, nitrate, nitrite, total Kjeldahl nitrogen, orthophosphate and total phosphorus

a Sediment screening adjacent to remaining old industrial source properties in high opportunity areas of Santa Fe Channel watershed

b Mercury and methylmercury water sampled were collected in lower Marsh Creek per Central Valley RWQCB requirement

SSC suspended sediment concentration

PSD particle size distribution

TOC total organic carbon

MeHg total methylmercury

**Table 5. Summary of Monitoring Completed in WYs 2016 through 2021 toward MRP Targets**

Pollutant Class by Water Year		Number of Samples Collected and Analyzed per Management Information Need					Annual Number of Samples Collected and Analyzed	
		Type 1: Source ID	Type 2: Bay Impairment	Type 3: Management Action	Type 4: Loads & Status	Type 5: Trends	Actual	Required by MRP
2016	PCBs	28	28	14	6	6	28	8
	Mercury	37	37	32	15	15	46	8
	Copper <sup>1</sup>	0	0	0	0	0	0	2
	Nutrients	0	0	0	0	0	0	2
2017	PCBs	27	27	27	14	14	27	8
	Mercury	26	26	18	18	18	26	8
	Copper <sup>1</sup>	4	4	0	4	4	4	2
	Nutrients	4	4	0	4	4	4	2
2018	PCBs	16	11	13	9	9	22	8
	Mercury	25	25	27	17	17	31	8
	Copper <sup>1</sup>	2	2	0	2	2	2	2
	Nutrients	2	2	0	2	2	2	2
2019	PCBs	8	8	4	6	4	8	8
	Mercury	16	16	12	14	12	16	8
	Copper <sup>1</sup>	12	12	0	12	12	12	2
	Nutrients	12	12	0	12	12	12	2
2020	PCBs	8	8	6	2	2	8	8
	Mercury	16	16	14	10	10	16	8
	Copper <sup>1</sup>	2	2	0	2	2	2	2
	Nutrients	2	2	0	2	2	2	2
2021	PCBs	8	8	8	0	0	8	8
	Mercury	16	16	8	8	8	16	8
	Copper <sup>1</sup>	2	2	0	2	2	2	2
	Nutrients	2	2	0	2	2	2	2
<b>WY 2016 – 2021 Totals / Required Number by end of WY 2021</b>							<b>WY 2016 – 2021 Totals</b>	<b>Requirement for 5-Year Permit Term, Plus 1 Year</b>
PCBs		95 / 8	90 / 8	72 / 8	37 / 8	35 / 8	101	88
Mercury		136 / 8	136 / 8	111 / 8	82 / 8	80 / 8	151	88
Copper <sup>1</sup>		22 / NA	22 / NA	0 / NA	22 / 4	22 / 4	22	22
Nutrients		22 / NA	22 / NA	0 / NA	22 / 20	22 / NA	22	22

1 Total and dissolved fractions of copper  
 NA = Not applicable; there is no permit requirement

### 3 MONITORING PLAN FOR WATER YEAR 2022

Water year 2022 is the last water year in the MRP 2.0 permit term. The SFRWQCB is expected to issue a revised MRP (MRP 3.0) in early 2022, with an effective date of July 1, 2022. Monitoring in water year 2022 will continue with a similar level of effort as in water year 2021, and is expected to include the following activities:

1. Sediment investigation of targeted old industrial source areas, including street dirt and drop inlet sediment sampling in the public right-of-way adjacent to high-opportunity properties;
2. Watershed characterization monitoring for copper and nutrients; and
3. Methylmercury monitoring in Marsh Creek.

The following subsections provide background information on monitoring goals and descriptions of planned activities, as well as overall numeric goals (number of samples to be collected) during water year 2022.

#### 3.1 Sediment Investigation of Remaining Old Industrial Source Areas

Sediment investigation of remaining old industrial source areas for PCBs and mercury will take place at locations identified through ongoing desktop research and field surveys. Sites which may be added to the sampling list include locations of interest due to historic or present-day land use, lack of adequate source control by property owners, and reoccurring accumulation of sediment within the right-of-way.

Eight sediment screening samples will be collected in water year 2022. However, if the RMP collects POC water samples in Contra Costa County, then fewer samples may need to be collected.

#### 3.2 Watershed Characterization for Copper and Nutrients

Sampling for copper and nutrients in water year 2022 is planned for lower Marsh Creek and/or its tributaries. The determination of nutrient concentrations in Marsh Creek may help to determine if elevated levels are present that might promote the growth of aquatic vegetation that is often observed during late spring and summer in lower Marsh Creek.

Two samples for copper and nutrients will be collected in water year 2022.

#### 3.3 Methylmercury Monitoring in Marsh Creek

Mercury and methylmercury monitoring in Marsh Creek (and its tributaries) will be used to further CCCWP's understanding of methylmercury distribution (spatially and temporally) within the Marsh Creek system. This sampling will satisfy the annual requirement of the recently promulgated MRP amendment (SFRWQCB, 2019).

Eight samples for mercury and methylmercury will be collected in water year 2022.

### 3.4 Stormwater Monitoring for PCBs and Mercury by the RMP

As a contributing member to the RMP, CCCWP participates in a Bay Area characterization study of PCBs and mercury in stormwater runoff in areas of interest. For water year 2022, stormwater samples may be targeted for collection within Contra Costa County at locations to be identified in a joint effort by the RMP and representatives of the CCCWP.

### 3.5 Summary of Monitoring Planned for Water Year 2022

Based on planned activities described in the sections above, sampling by CCCWP for water year 2022 is summarized in Table 6.

Pollutant Class / Type of Monitoring	Management Information Need					Number of Samples Planned for WY 2022 by CCCWP (and through the RMP)	Cumulative Number of Samples Collected and Analyzed in WYs 2016 through 2021	Annual Minimum Number of Samples Required by the MRP	Total Number of Samples Required By the MRP Over 5 Year Term, Plus 1 Additional Year
	Source ID	Bay Impairment	Management Action	Loads & Status	Trends				
PCBs – water	X	X	X	X	X	2 <sup>a</sup>	101	8	88
PCBs – sediment	X	X	X		X	6 <sup>b</sup>			
Mercury & MeHg - water	X	X	X	X	X	8 <sup>c</sup>	151	8	88
Mercury – water	X	X		X	X	2 <sup>a</sup>			
Mercury - sediment	X	X	X			6 <sup>b</sup>			
Copper <sup>1</sup> – water	X	X		X	X	2 <sup>d</sup>	22	2	22
Nutrients <sup>2</sup> – water	X	X		X	X	2 <sup>d</sup>	22	2	22

MeHg = methylmercury

1 Total and dissolved copper

2 Ammonium, nitrate, nitrite, total Kjeldahl nitrogen, orthophosphate and total phosphorus

a Stormwater samples targeted for collection by the RMP in Contra Costa County

b Sediment screening from streets, drop inlets and/or public rights-of-way

c Mercury and methylmercury monitoring in Marsh Creek per Central Valley requirements

d Characterization monitoring in Marsh Creek

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