

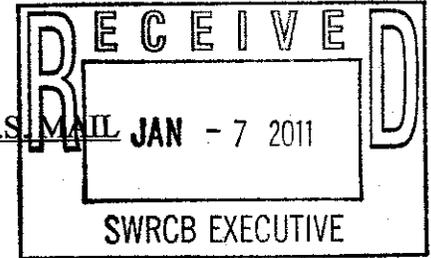
# Delta Diablo Sanitation District

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January 7, 2011

VIA ELECTRONIC MAIL ([commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)) & U.S. MAIL JAN - 7 2011

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814



SUBJECT: COMMENT LETTER - CEC MONITORING FOR RECYCLED WATER

Ms. Townsend:

Delta Diablo Sanitation District (District) appreciates the opportunity to provide comments to the State Water Resources Control Board (Water Board) staff report, "Constituents of Emerging Concern in Recycled Water" (November 9, 2010).

Delta Diablo Sanitation District provides wastewater treatment for nearly 200,000 residents in the communities of Antioch, Bay Point and Pittsburg. In 2010 the District received the Platinum Peak Performance 6 award from the National Association of Clean Water Agencies for its history of compliance with its National Pollutant Discharge Elimination System permit for over six consecutive years. In addition to wastewater treatment, the District performs street sweeping functions, conducts stormwater inspections, and provides household hazardous waste services to its ratepayers as well as neighboring communities. All of the services support the District's purpose to "safeguard and enhance the environment of the communities we serve."

The District also operates one of the largest industrial recycled water plants in California (over 2 billion gallons per year to power plants) and distributes 146 million gallons per year to landscape irrigation. For this reason, it is important to the District that all monitoring requirements, including testing for constituents of emerging concern (CECs), should be based on good science and should produce useful information about the quality of recycled water.

With respect to the many details addressed by the staff report the District would refer you to the joint comment letter submitted by the Association of Clean Water Agencies, the California Association of Sanitation Agencies, and the WaterReuse Association. In addition, the District would like to offer the following observations.

In general the District agrees with the staff report, and would like to commend the Board staff for their effort. The District particularly supports their recommendation that the Board adopt the findings of the "Blue Ribbon" Science Advisory Panel contained in their report, "Monitoring Strategies for Chemicals of Emerging Concern (CECs) in Recycled Water" (June 25, 2010). That Panel was convened as the result of a collaborative stakeholder process including water and wastewater agency managers and representatives of environmental advocacy groups. Furthermore, as noted in the staff report, the Science Advisory Panel's recommendations reflect the best scientific analysis currently available with respect to the prevalence of CECs and their potential impact on human health through the use of recycled water for nonpotable (landscape irrigation) or potable (groundwater recharge) purposes.

Ms. Jeanine Townsend, Clerk to the Board

January 7, 2011

COMMENT LETTER – CEC MONITORING FOR RECYCLED WATER

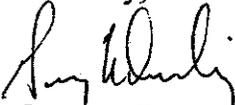
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However, the District does not support the statement contained in the staff report that surface spreading groundwater recharge/reuse projects should also be required to monitor the additional constituents suggested by the California Department of Public Health (CDPH) in their letter of September 13, 2010. Before making its recommendations, the Science Advisory Panel developed a rigorous, systematic protocol to determine the value of monitoring any given constituent, to indicate either the risk of exposure to recycled water or the effectiveness of the treatment processes used to manufacture it. It was this protocol, for example, that resulted in the Panel's recommendation to substitute surrogate measurements for CECs in irrigation projects, thereby allowing our communities to continue to use recycled water for nonpotable purposes, reducing the strain on our limited drinking water supplies. By contrast, CDPH staff provided no basis for adding these chemicals to the list of monitored constituents, either in their letter or at the Board workshop on December 15, 2010.

If the Board adds the chemicals suggested by CDPH to the list of monitored constituents without first testing them according to the Science Advisory Panel protocol, it will not only challenge the validity of the Panel's framework for monitoring CECs, it will also undermine the legitimacy of the collaborative process itself. In that case, the District would be concerned that in the future additional monitoring requirements might be imposed upon landscape irrigation projects without any adequate scientific basis for doing so. The District also has a similar concern about any direction to the nine Regional Boards to add monitoring requirements to reuse project permits without adequate scientific review.

As stated in its preamble, the goal of the Board's Recycled Water Policy is "to increase the use of recycled water and to maximize consistency in the permitting of recycled water projects." To this end, we encourage you to adopt the recommendations of the Science Advisory Panel report, "Monitoring Strategies for Chemicals of Emerging Concern (CECs) in Recycled Water" without modification. Thank you for the opportunity to comment.

Sincerely,



Gary W. Darling  
General Manager

AWR/GWD:awr

cc: David Smith, WaterReuse Association, California Section  
District File CORP.15.03-CORRES-XX  
Chron File