

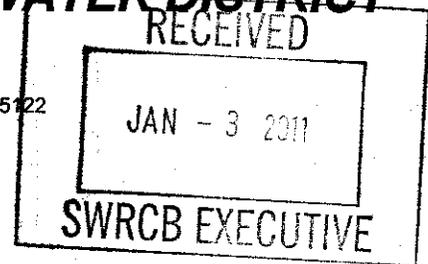
DIRECTORS:
HARRY M. COWAN
DAVID HADLEY
JONATHAN HALL
JEAN PREL
ROBERT R. SCHULTZ

Public Hearing (12/15/10)
CEC – Recycled Water
Deadline: 1/10/11 by 12 noon

OFFICERS:
HARRY M. COWAN, PRESIDENT
ROBERT R. SCHULTZ, VICE PRESIDENT
JOHN A. MARTIN
SECRETARY-
GENERAL MANAGER

TEHACHAPI-CUMMINGS COUNTY WATER DISTRICT

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December 23, 2010

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000

Re: Comment Letter – CEC Monitoring for Recycled Water

Dear Ms. Townsend:

Last year your Board approved Water Quality Order No. 2009-0006-DWQ, General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water (General Permit). That document clearly sets forth the responsibilities of Producers, Distributors and Users of municipal recycled water and states, "Producers shall be responsible for ensuring that recycled water meets the quality standards of this General Permit and any associated waste discharge requirement order(s) for the WWTP(s)." All costs to monitor for chemicals of emerging concern (CECs) should be borne by the Producer of recycled water, supplemented by State or Federal funding.

Your staff report regarding CEC monitoring does not specify who will be responsible for CEC monitoring costs except to make two vague statements about the State "seeking funding" for the program. Because of the fact that the monitoring sites may be located within the Distributor's pipeline system or on the User's application area, the erroneous conclusion could be made that it will be the Distributor or User who is responsible to bear the monitoring costs. This mistake should not be made, as it is clearly the Producer's responsibility to ensure compliance with all recycled water quality standards, of which CEC monitoring is obviously a component.

Neither should the funding responsibility fall on the Administrator if the Administrator is a Distributor. Your Monitoring and Reporting Program No. 2009-0006-DWQ makes no mention of CECs, nor does the Notice of Intent (attachment B to Order No. 2009-0006-DWQ). Although a Distributor may be an Administrator under the permit, they should not be financially responsible for CEC monitoring.

Sincerely,

John Martin
General Manager

cc: Board of Directors