

From: Steve Bigley <SBigley@cvwd.org>
To: <commentletters@waterboards.ca.gov>
CC: Mark Johnson <MJohnson@cvwd.org>, Dan Farris <DFarris@cvwd.org>, OliviaB...
Date: 1/10/2011 11:10 AM
Subject: Comment Letter - CEC Monitoring for Recycled Water

Dear Ms. Townsend, Clerk to the Board:

We appreciate the opportunity to provide comments on the Staff Report for the subject monitoring. Coachella Valley Water District (CVWD) provides domestic water, wastewater, recycled water, irrigation/drainage and regional storm water protection services to a population of 265,000 throughout the Coachella Valley.

CVWD believes the State Water Resources Control Board (SWRCB) Staff Report should be revised to more closely adhere to the recommendations developed by the Science Advisory Panel (Panel) convened for the purpose of applying the best available science to monitoring recycled water for Constituents of Emerging Concern (CECs).

Our three recommendations for improving the Staff Report are as follows:

1. The Staff Report needs to clarify that the water consumption rate of 2 milliliters per day was used to derive Monitoring Trigger Levels (MTLs) for evaluating CECs found in recycled water used for landscape irrigation and that based on these MTLs and occurrence data there were no CECs that were deemed to be of concern for monitoring for this use.
2. The 13 CECs added for monitoring based solely on the September 13, 2010 request from California Department of Public Health and no scientific supporting information should be removed from the baseline monitoring list included in the Staff Report.
3. The Staff Report should be revised to incorporate the detailed clarifications and recommendations provided in Attachment 1 of the joint comments submitted by the Association of California Water Agencies, the California Association of Sanitation Agencies and WateReuse California.

Your consideration of these comments is appreciated.

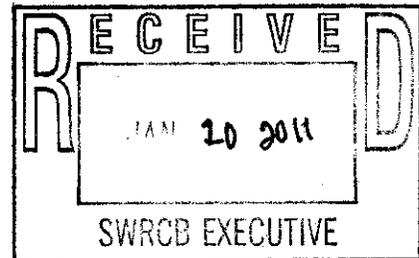
Yours very truly,

Steve Bigley

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