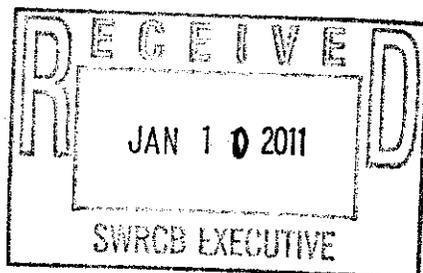


Public Hearing (12/15/10)
CEC - Recycled Water
Deadline: 1/10/11 by 12 noon



3152 Shad Court
Simi Valley, CA 93063
January 10, 2011

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

Re: "Comment Letter - CEC Monitoring for Recycled Water".

Dear Ms. Townsend:

The following are my comments on the aforementioned subject for the Board's consideration.

- #1 - The list of Constituents of Emerging Concern (CEC) is too limited. This impacts: 1. the Simi Valley Landfill expansion project request to the County of Ventura, 2. the DTSC/NASA/DOE Santa Susana Field Laboratory Cleanup Agreement, 3. the Ventura County MS4 NPDES Permit, 4. the City of Simi Valley's Municipal NPDES Permit, and 5. the City of Thousand Oaks Municipal NPDES Permit.
- #2 - I am greatly concerned with the CEC Advisory Panel's recommendations on the risks of CECs to the public health and the environment with regards to their monitoring in the "groundwater recharge/reuse" "percolation or subsurface injection into a drinking water aquifer and urban landscape irrigation" (Pages 1 and 2 of the November 18, 2010 NOTICE OF PUBLIC HEARING document). The Los Angeles Regional Water Quality Control Board's hearing on the General NPDES Permit for Discharges to Ground Water from Water Supply Wells to Surface Waters in Los Angeles and Ventura Counties (General NPDES Permit No. CAG994005) has not been re-agendized since it was postponed for the December 10, 2009 Board Meeting.
- #3 - I am greatly concerned that, even though the California Department of Public Health has recommended the "monitoring for certain additional CECs" (Page 1 of

2, the December 15, 2010 DRAFT Item document) and DWT staff concurs with the CDPH, the impacts to the public health from the use of Point-of-use(POU) device treatment processes, instead of centralized treatment, have not been fully taken into account.

#4 - The CECs documents refer to both Constituents of Emerging Concern, and Chemicals of Emerging Concern in municipal recycled water. There must be consistency within the scientific community, the State and Regional Water Boards, other State agencies, stakeholders, and the general public as to which subject: 1. is being discussed, 2. the policy is being proposed for, and 3. is being regulated. There is no room for confusing the issue especially at a time when the Water Quality Monitoring Council has made great strides in "effectively" implementing "the goals of CA SB 1070" (Page 4 of the Monitoring Council's December 28, 2010 letter to the Secretaries of Cal/EPA and the Natural Resources Agency, and in its December 23, 2010 Comprehensive Monitoring Program Strategy for California). It is stated on Page 2 of the December 15, 2010 DRAFT Item document that "State Water Board action on this item will assist the Water Boards in reaching Goals 2, 3 and 6 of the Strategic Plan Update: 2008-2012... Goal 6 is to enhance consistency across the Water Boards, on an ongoing basis".

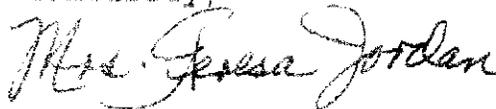
#5 - The statement "CEC monitoring for municipal recycled water used to recharge groundwater for indirect potable reuse..." (Page 1 of the November 18, 2010 NOTICE OF PUBLIC HEARING document) is a little misleading. Under BACKGROUND, it is stated that "The CEC Advisory Panel was charged with...providing recommendations on monitoring CECs for various water recycling practices, including groundwater recharge/reuse to augment groundwater via percolation or subsurface injection into a drinking water aquifer..." It is stated on Page 1 of the November 8, 2010 STAFF REPORT document that "...monitoring CECs for various water recycling practices, including groundwater recharge/reuse to augment groundwater via surface spreading and percolation into a drinking water aquifer; groundwater recharge/reuse via subsurface injection into a drinking water aquifer".

- #6 - I disagree with the statement that "The removal of the performance-based indicator CEC through a treatment process provides an indication of the removal of the other CECs in the group" (Page 2 of the November 8, 2010 STAFF REPORT document).
- #7 - Whenever chemicals and constituents are listed in a sentence instead of individually listed in a table or chart in any document, please separate them with semi-colons, instead of commas, since some of the chemicals and constituents have commas in their scientific names in order for the information that is provided be reader-friendly. Example: "The six compounds selected to serve as performance-based indicator CECs are caffeine, gemfibrozil, n,n-diethyl-meta-toluamide (DEET), iopromide, NDMA, and sucralose..." (Page 2 of the November 8, 2010 STAFF REPORT document). Or, list the chemical/constituent/compound with a comma in its name as the last item.
- #8 - While it is stated on Page 3 of the November 8, 2010 STAFF REPORT document that "Monitoring of additional health-based CECs may be required by a Regional Water Board on a project specific basis. However, the process for selecting additional health-based CECs for monitoring would have to be consistent with the Panel's exposure screening approach (i.e. evaluation of MEC/MTL)", I am concerned with the fact that the California Department of Public Health is recommending adding chemicals/constituents/compounds to the CEC Advisory Panel (scientific)'s list. And, while it is also stated that "The Panel's exposure screening approach is the recommended method for determining health-based CECs" this screening approach's reliability may be scrapped for something better, or be questioned in the future.
- #9 - I have great concerns with the following statements on Pages 3 and 4 of the November 8, 2010 STAFF REPORT document. "The selection of appropriate surrogates will vary based on project specifics including the types of treatment processes, use of the recycled water, and the measurable occurrence of the parameter in the treatment train... Where applicable, surrogate parameters may be monitored using inline or hand-held devices provided appropriate calibration measures are

implemented and documented...The selection of appropriate performance-based indicator CECs and surrogate parameters is dependant on the type of treatment processes used and the recycled water use".

- #10 - I disagree with the statement that "Monitoring for health-based CECs and performance-based indicator CECs is not recommended for landscape irrigation projects, because of the low water ingestion rate with landscape irrigation use" (Page 4 of the November 8, 2010 STAFF REPORT document).
- #11 - I disagree with the California Department of Public Health (CDPH)'s statement on Page 1 of the Agency's September 13, 2010 letter to Mr. Jonathan Bishop that the notification list chemicals mentioned "be monitored quarterly initially and can be reduced to yearly, if these compounds are not detected..."
- #12 - I disagree with the California Department of Public Health (CDPH)'s statement on Page 1 of the Agency's September 13, 2010 letter to Mr. Jonathan Bishop that the "other chemicals" mentioned "be monitored quarterly...can be reduced yearly, if the compound is not detected..."
- #13 - I am concerned that the California Department of Public Health (CDPH) has not determined the "acceptable detection levels" for "other chemicals" such as chromium-6, diazinon, nitrosamines, Bysphenyl A, TCEP, and carbamazepine" (Page 1 of the Agency's September 13, 2010 letter to Mr. Jonathan Bishop).
- #14 - Currently, I have great reservations with the Water Quality Monitoring Council's recommendation to the Secretaries of the Cal/EPA, and the Natural Resources Agency to invite the California Department of Public Health to sign onto the Agencies MOU.

Sincerely,



Mrs. Teresa Jordan