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Date: July 3, 2012

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 "I" Street, 24th Floor
Sacramento, CA 95814

Via email to commentletters@waterboards.ca.gov

SUBJECT: SRCSD Comment Letter - Amendment to the Recycled Water Policy

Dear Ms. Townsend:

Thank you for the opportunity to review and provide comments on the subject document. The following comments are being provided by the Sacramento Regional County Sanitation District (SRCSD) related to the May 7, 2012 proposed amendment titled *Requirements for Monitoring Constituents of Emerging Concern for Recycled Water*. SRCSD provides recycled water for landscape irrigation in south Sacramento County and complies with the requirements of the State's policies and NPDES permit requirements related to recycled water use. SRCSD is generally supportive of the proposed amendment to the Recycled Water Policy (Policy). However, we are providing comments and recommendations related to future efforts the State Water Resources Control Board, the Science Advisory Panel and other experts may undertake related to constituents of emerging concern (CECs).

The Recycled Water Policy and many other documents published by the State related to CECs focus on wastewater as a source of CECs. While CECs may enter the environment through discharges from runoff, storm water, wastewater and recycled water projects, CECs originate from the manufacture and use of products such as pharmaceuticals, fertilizers and pesticides.

It is a challenging effort to evaluate and regulate CECs and to determine effective methods to test and treat water impacted by these complex chemical compounds that are present in trace levels. We recommend, to the extent possible, that the State Water Board, the Department of Public Health and the Scientific Advisory Panel engage the product manufacturers in future efforts related to evaluating CECs and their impacts.



