

January 29, 2009

Catherine Kuhlman: Executive Officer  
North Coast Regional Water Quality Control Board  
5550 Skylane Blvd. Ste. A  
Santa Rosa, CA 95403

Public Comment WATER QUALITY CONTROL PLAN FOR THE NORTH COAST REGION TO ESTABLISH EXCEPTION CRITERIA TO THE POINT SOURCE WASTE DISCHARGE PROHIBITIONS BY REVISING THE ACTION PLAN FOR STORM WATER DISCHARGES AND ADDING A NEW ACTION PLAN FOR LOW THREAT DISCHARGES.

Dear Ms. Kuhlman:

"All our water sources - rivers and reservoirs, springs and aquifers - may contain drugs flushed down our toilets and off factory farms somewhere up stream," said Food & Water Watch Executive Director Wenona Hauter. (See attached "Drugs in Water" articles)

Disposal of treated wastewater whether it is through irrigation, direct discharge to rivers, or over spraying of land is disposal. As you know, wastewater is comprised of treated sewage and other highly polluted liquids, solids, and chemicals that find their way down toilets, sinks, and drains most of which then pass through treatment facilities. And the treatment train is imperfect.

There must be no granting of exceptions to current regulations nor weakening, of definitions, requirements, or limits with respect to disposal of treated wastewater even if it is given a different name. To the extent that this Basin Plan amendment strengthens protection of water quality, beneficial uses and provides increased long-term environmental benefits, the amendment is proper. All state laws meant to enhance, improve, maintain, and protect high quality drinking water, beneficial uses, including but not limited to the California Environmental Quality Act, the California

Toxics Rule, and all federal statutory schemes meant to eliminate water pollution, must be complied with. Backsliding, compromise of scientific standards and knowledge, and further degradation of surface and groundwater cannot be substituted for the expediency of the moment.

Wastewater is clearly not safe potable water (see the attached studies) and it is the main way, and often times the only way, in which many pollutants enter the environment, the groundwater, and the surface waters. In a study of 19 water facilities, eleven pharmaceuticals were detected on a frequent basis. ... 'several point to the potential for risk - especially for the fetus and those with severely compromised health.' (Rowan Hopper January 2009, attached). The authors go on to suggest that the amount of pollution to which we subject our children, wildlife, and ourselves is a choice.

It is not proper, based upon what evidence we do have, to place the environment and people at higher risk by relaxing protections of water quality and granting exceptions to discharge regulations. Choosing to *not* waive prohibitions on incidental run off of wastewater and choosing *not* to set what are merely arbitrary thresholds would be to impose more control and a return to common sense rather than common denial. There are other ways in which to manage wastewater the first of which is to begin to accept the notion of limits. Regulatory agencies must continue vigorous efforts to clean up the environment and our waterways rather than be pushed to find additional ways in which to negatively impact them.

Impaired water bodies must not be subjected to further impacts, and clean water bodies must be protected.

The conditions in which fish and amphibians spend their entire life are already harmful to them. To these, there is no longer such a thing as a low threat pollutant. The thresholds have been exceeded. Humans too are suffering the effects of pollution. Wastewater is a toxic brew and even treated wastewater poses substantial known and unknown risks to the environment, wildlife, and humans.

Relaxation of rules governing runoff of polluted irrigation or over spray is not indicated at this time. On the contrary, the opposite is indicated. Stronger rules protective of water quality are indicated and more aggressive enforcement is warranted.

Thank you for careful consideration of the above, the attached, and the authorities referenced therein.

Sincerely,  
*Kimberly Burr*  
Kimberly Burr

Attachments: Triclosan Final; EPA Not Informed; Drugs in Water; and Rowan Hopper

