



# A. V. United Water Purveyors, Inc.

Incorporated November 5, 1987  
3507 East Avenue H-4 Lancaster, California 93535 (661) 946-2256

August 17, 1999

Mr. Todd Thompson,  
Associate Water Resources Control Engineer  
Division Of Water Quality  
State Water Resources Control Board  
P. O. Box 944213  
Sacramento, Ca. 94244-2130

Dear Mr. Thompson

Please accept our comments in regard to the DEIR for waste discharge requirements for biosolids land application.

First of all, we are very much concerned that the spreading of biosolids will contaminate our groundwater. The DEIR describes the potential for water contamination as "less than significant" and "low probability". We feel that when you are protecting human health, and you have a choice in the decision that you make, anything short of "zero probability" is not acceptable to allow spreading of contaminants.

27-1

A very important factor to consider is the wind that is very common in the Antelope Valley. It is not uncommon to have wind gusts that exceed 40 mph. There is no question that these winds will blow the contaminants all over the valley, and some of these contaminants will find their way down many abandoned wells in the valley that have not been properly sealed.

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We ask that the spreading of biosolids be prohibited in any area where human beings live with no exceptions.

Sincerely

Jim Barletta  
President

## **Responses to Comments from A.V. United Water Purveyors Inc.**

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- 27-1. The comment letter infers that the conclusions reached with respect to “significance” and “probability of occurrence” are inadequate. The SWRCB staff respectfully disagrees with the comment. Master Responses 13 and 14 generally describe the basis for the analysis of potential surface and groundwater quality impacts in the EIR with respect to EPA’s risk assessments conducted for the Part 503 regulations, additional protective measures in the proposed GO, and the authority of RWQCB staff to use monitoring and professional judgment to determine whether a specific biosolids application project would protect water quality. The EIR requires CEQA significance conclusions to be presented that are based on evidence of the duration, extent and intensity of the impact. The risk assessments conducted for the Part 503 regulations development process considered the probability for human exposure to contaminants contained in biosolids. It provides statistically based evidence that contamination from biosolids application under the proposed GO would be very low. The EIR has examined conditions present in California and determined what additional protective measures should be used to protect water quality, land productivity, and public health.
- 27-2. Please see Master Response 9.