



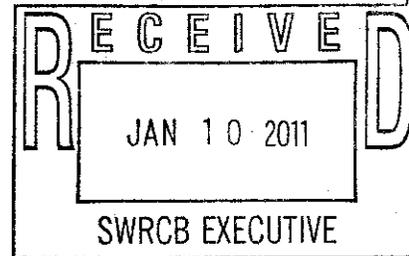
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January 10, 2011

Sent via Electronic Mail and U.S. Mail

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000



**Subject: Comment Letter - CEC Monitoring for Recycled Water**

Dear Ms. Townsend and Members of the State Water Resources Control Board:

Thank you for allowing us the opportunity to comment on the State Water Resources Control Board (Board) staff report, "Constituents of Emerging Concern in Recycled Water" (November 9, 2010). With respect to the many details addressed by the staff report, we would refer you to the joint comment letter submitted by ACWA, CASA and the WaterReuse Association. In addition, East Bay Municipal Utility District (EBMUD) offers the following comments.

**EBMUD particularly supports the recommendation that the Board should adopt the findings of the "Blue Ribbon" Science Advisory Panel contained in their report, "Monitoring Strategies for Chemicals of Emerging Concern (CECs) in Recycled Water" (June 25, 2010).** EBMUD currently serves about 9 million gallons per day of recycled water to customers for primarily landscape irrigation and industrial applications. In general EBMUD supports many elements of the staff report, and would like to commend the Board staff for their effort. As noted in the staff report, the Science Advisory Panel's recommendations reflect the best scientific analysis currently available with respect to the prevalence of CECs and their potential impact on human health through the use of recycled water for nonpotable (landscape irrigation) or potable (groundwater recharge) purposes.

**EBMUD does not support the conclusion in the staff report that surface spreading groundwater recharge/reuse projects should be required to monitor the additional constituents referenced in the California Department of Public Health (CDPH) letter of September 13, 2010.** Before making its recommendations, the Science Advisory Panel developed a rigorous, systematic protocol to determine the value of monitoring any given constituent, to indicate either the risk of exposure to recycled water or the effectiveness of the treatment processes used to manufacture it. By contrast, CDPH staff did not provide any basis for adding these chemicals to the list of monitored constituents, either in their letter or at the Board workshop on December 15, 2010.

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If the Board adds the chemicals suggested by CDPH to the list of monitored constituents without first testing them according to the Science Advisory Panel protocol, it will undermine the validity of the Panel's framework for monitoring CECs, and the collaborative process itself. Although EBMUD does not currently plan to implement groundwater recharge projects using recycled water, we are concerned that future monitoring requirements might be imposed upon landscape irrigation projects without any adequate scientific basis. We have a similar concern about any direction to the nine Regional Boards to add monitoring requirements to reuse project permits without adequate scientific review.

As stated in its preamble, the goal of the Board's Recycled Water Policy is "*to increase the use of recycled water and to maximize consistency in the permitting of recycled water projects.*" EBMUD supports this goal. To this end, we encourage you to adopt the recommendations of the Science Advisory Panel report, "Monitoring Strategies for Chemicals of Emerging Concern (CECs) in Recycled Water" without modification. Thank you for your consideration. If you have any questions, you can contact Linda Hu, Supervisor of EBMUD's Office of Water Recycling, at (510) 287-1691 or [lhu@ebmud.com](mailto:lhu@ebmud.com).

Sincerely,



Alexander R. Coate  
Director of Water and Natural Resources

ARC:MTT:LHH