



# CVCWA Central Valley Clean Water Association

Representing Over Sixty Wastewater Agencies

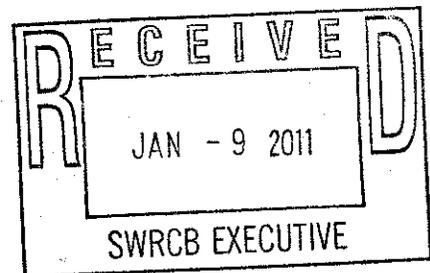
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**Sent via electronic mail**

January 9, 2011

Attn: Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



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

Dear Ms. Townsend:

The Central Valley Clean Water Association (CVCWA) consists of public agencies located within the Central Valley region that provide wastewater collection, treatment and water recycling services to millions of Central Valley residents and businesses. CVCWA is offering comments for consideration by the State Water Resources Control Board (State Water Board) during adoption of the policy for CEC monitoring in recycled water. CVCWA supports the comments provided by the California WaterReuse Association, the California Association of Sanitation Agencies, and the Association of California of Water Agencies on the proposed policy. However, we believe it is also important that that the State Water Board also address the following two issues.

**Issue No. 1 – Provide clarification that CEC monitoring is required only for recycled water projects designed to recharge a groundwater basin and for recycled water destined for irrigation of urban landscape vegetation.**

The State Water Board Staff Report<sup>1</sup> recommends monitoring for “municipal recycled water used for groundwater recharge/reuse and landscape irrigation.” The CEC Panel developed its monitoring strategy based on using recycled water to irrigate urban landscape vegetation and the

<sup>1</sup> “Staff Report - Constituents of Emerging Concern (CEC) Monitoring for Recycled Water,” SWRCB, November 8, 2010, page 1.

indirect potable reuse of recycled water during groundwater recharge using subsurface spreading and subsurface injection into a drinking water aquifers<sup>2</sup>. Without additional clarification on applicable projects, CVCWA is concerned that Regional Water Boards will apply costly and unnecessary monitoring requirements to other types of recycled water or wastewater disposal operations. For example, CEC monitoring should not be required for recycled water being stored solely as a supply for urban landscape or agricultural irrigation. CEC monitoring should also not be required for agency operations that utilize land disposal of wastewater. To ensure the CEC Panel's monitoring strategy is applied to appropriate projects and is consistently applied as permit requirements, CVCWA requests the following project definitions be included in the final adopted policy: (1) The definition for "Groundwater Recharge Reuse Project" as indicated in the draft Groundwater Recharge Reuse Regulations developed by the California Department of Public Health<sup>3</sup>, and (2) the allowable uses of recycled water for landscape irrigation under Title 22 (i.e., parks, playgrounds, school yards, residential landscaping, commercial landscaping, golf courses, cemeteries, and freeway landscaping)<sup>4</sup>.

***Issue No. 2 – Include reduced or phased monitoring requirements for small communities that are implementing recycled water projects.***

There are many small and/or disadvantaged communities in California facing economic challenges related to operation of and planning for wastewater disposal and water supply projects. Wastewater recycling is a solution that can apply to both wastewater and water supply problems. Recycling projects are encouraged for these communities to help offset groundwater pumping or reduce volume of imported water. However, a small rate base and low median household incomes often prevent consideration or development of these projects. CVCWA is concerned that implementation of costly CEC monitoring requirements and the priority pollutant monitoring requirements contained in the Recycled Water Policy will provide additional impediments to these efforts. To reduce the impact on these small and/or disadvantaged communities and encourage project development, CVCWA recommends the recommended CEC monitoring frequency and priority pollutant be reduced, and small and/or disadvantaged communities be excluded from "research" activities. Several options for reduced monitoring should be explored, including reduced frequency (e.g., from quarterly to semi-annually, annually, or once a 3- or 5-year period), and reducing or eliminating monitoring for CECs or priority pollutants that are not present at levels of concern in the recycled water. Additionally, with CEC's monitoring requirements could be phased-in after several years, in order for the analytical methods to be more fully developed and common, which typically results in reduced analytical costs. This approach is consistent with the State Water Board's "Small Community Wastewater Strategy"<sup>5</sup> which is annually reviewed and updated to consider impacts to small communities from regulations related to wastewater treatment and water supply.

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<sup>2</sup> "Final Report – Monitoring Strategies for Chemicals of Emerging Concern (CECs) in Recycled Water," Recommendations of a Science Advisory Panel convened by the State Water Resources Control Board, June 25, 2010, page ii.

<sup>3</sup> <http://www.cdph.ca.gov/certlic/drinkingwater/Documents/Recharge/DraftRechargeReg2008.pdf>

<sup>4</sup> California Code of Regulation, Title 22, Division 4, Article 3, Sections 60304

<sup>5</sup> "Promoting Strategies to Assist Small and/or Disadvantaged Communities with Wastewater Needs," Water Resources Control Board Resolution No. 2008-0048, adopted July 1, 2008.

Thank you for consideration of these issues. Please contact me at (530) 268-1338 if you have any questions or wish to discuss our comments.

Sincerely,



Debbie Webster  
Executive Officer, CVCWA

Cc. Pamela Creedon – Central Valley RWQCB  
David W. Smith - CA WaterReuse  
Bobbi Larson – CASA  
David Bolland - ACWA  
Mary Grace Pawson