



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

Public Hearing (12/15/10)  
CEC - Recycled Water  
Deadline: 1/10/11 by 12 noon

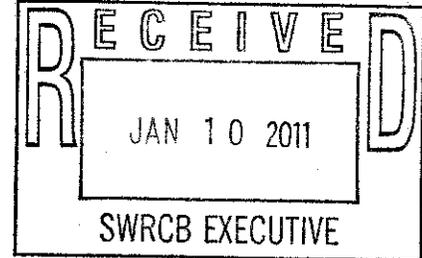
Office of the General Manager

January 10, 2011

VIA EMAIL

commentletters@waterboards.ca.gov

Chair Charlie Hoppin  
Members of the State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100



Dear Chair Hoppin and Members of the Board:

Comment Letter - CEC Monitoring for Recycled Water

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to provide comments on the recommendations regarding monitoring of constituents of emerging concern (CECs) in recycled water used for groundwater recharge and landscape irrigation. Metropolitan appreciates the State Water Resources Control Board's leadership and believes that significant progress is being made to achieve the State's goal of increasing the use of recycled water by over 1 million acre-feet by 2020 (Water Code, § 13560).

In order to achieve the State's recycled water goal and diversify our water portfolio to meet the needs of over 19 million people, Metropolitan has two main comments:

1. Metropolitan strongly supports the adoption of the Science Advisory Panel's (Panel) recommended CEC monitoring program as specified by the Panel. Implementation of the Panel recommendations would use the best available science, provide clear and consistent statewide guidelines to water agencies, and protect human health and source water supplies at a reasonable cost. Changes or augmentation of the Panel's recommendation are not warranted at this time. If changes are needed in the future, reconvening or creating a new Science Advisory Panel to address any new concerns and analytical methods is acceptable.
2. We believe that the additional CEC monitoring requirements from the Regional Water Quality Control Board's are not warranted at this time. Requirements for additional monitoring without standard analytical methods and justification are not cost-effective. If it is determined that additional monitoring is necessary, Metropolitan recommends that the Regional Water Quality Control Boards add additional CECs monitoring only on a case-by-case basis and after using the Panel's exposure screening approach to identify appropriate constituents. The exposure screening approach is a conservative method of prioritizing monitoring based on potential health risks. Specific monitoring to protect human health can already be recommended on a case-by case basis by the Department of Public Health, if needed.

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Metropolitan also supports the comments provided by the California Urban Water Agencies, the Association of California Water Agencies, the California Association of Sanitation Agencies and the WaterReuse Association regarding CEC monitoring for recycled water.

Thank you for advancing the use of recycled water, which is an important component of our Integrated Resource Plan. If you have any questions, please contact Mr. Raymond Jay of my staff at (213) 217-5777 or via email at [rjay@mwdh2o.com](mailto:rjay@mwdh2o.com).

Very truly yours,



Deven N. Upadhyay  
Manager, Water Resource Management

RJ:tt