



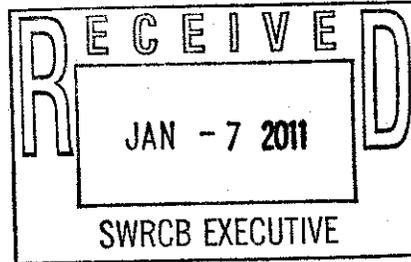
# Central Contra Costa Sanitary District

Protecting public health and the environment

5019 Innhoff Place, Martinez, CA 94553-4392

January 9, 2011

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



PHONE: (925) 228-9500  
FAX: (925) 676-7211  
[www.centrcsan.org](http://www.centrcsan.org)

JAMES M. KELLY  
General Manager

KENTON L. ALM  
Counsel for the District  
(510) 808-2000

ELAINE R. BOEHME  
Secretary of the District

Sent via email

## SUBJECT: CONSTITUENTS OF EMERGING CONCERN MONITORING FOR RECYCLED WATER

Dear Chair Hoppin and Members of the Board:

Central Contra Costa Sanitary District (CCCSD) appreciates the opportunity to comment on the State Water Resources Control Board (SWRCB) staff report titled "Constituents of Emerging Concern in Recycled Water" (November 9, 2010). With respect to the many details addressed by the staff report, we support the joint comment letter submitted by the Association of California Water Agencies, the California Association of Sanitation Agencies and the WaterReuse Association. In addition, we urge the SWRCB to consider the following observations.

CCCSD currently serves over 200 million gallons of recycled water to customers for landscape irrigation and industrial process water. For this reason, it is important to us that all monitoring requirements, including testing for constituents of emerging concern (CECs), should be based on good science and should produce useful information about the quality of recycled water.

In general, we agree with the staff report and we would like to commend the SWRCB staff for their effort. We support their 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). That Panel was convened as the result of a collaborative stakeholder process including water and wastewater agency managers and representatives of environmental advocacy groups. Furthermore, 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 non-potable (landscape irrigation) or potable (groundwater recharge) purposes.

However, we do not support SWRCB staff's recommendation that surface spreading groundwater recharge/reuse projects should also be required to monitor the additional constituents suggested by the California Department of Public Health (CDPH) in their 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. It was this protocol, for example, that resulted in the Panel's recommendation to substitute surrogate measurements for CECs in irrigation projects, thereby allowing our communities to continue to use recycled water for non-potable purposes, reducing the strain on our limited drinking water supplies in California. By contrast, CDPH staff provided no basis for adding these chemicals to the list of monitored constituents, either in their letter or at the Board workshop on December 15, 2010.

If the SWRCB 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 not only challenge the validity of the Panel's framework for monitoring CECs, it will also undermine the legitimacy of the collaborative process itself. In that case, we would be concerned that in the future additional monitoring requirements might be imposed upon landscape irrigation projects without an adequate scientific basis for doing so. We also have a similar concern about any direction to the nine Regional Boards to add monitoring requirements to reuse project permits without adequate scientific review.

Since one of the goals of the SWRCB's Recycled Water Policy is *"to increase the use of recycled water and to maximize consistency in the permitting of recycled water projects,"* we encourage the Board 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 the opportunity to provide comments on the SWRCB's staff report. If you have any questions regarding our comments, please contact me at (925) 229-7386.

Sincerely,



James M. Kelly  
General Manager

cc: Dr. David Smith, WaterReuse Association, California Section (by email)