

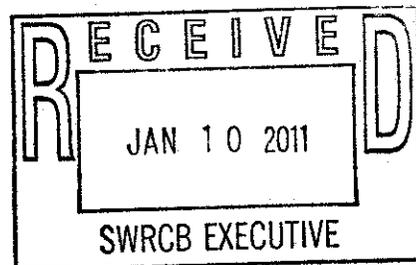


Dedicated to Preserving the Napa River for Generations to Come

January 10, 2011

BY EMAIL: commentletters@waterboards.ca.gov

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: Comment Letter - CEC Monitoring For Recycled Water

Dear Ms. Townsend,

The Napa Sanitation District (District) welcomes 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. We appreciate the time and resources committed by the State Water Resources Control Board (State Water Board) in collaboration with the Science Advisory Panel (Panel) to develop these recommendations.

An annual average of 28 percent of the District's treated wastewater has been recycled in recent years. The District is in its sixteenth year of implementing its recycled water program, and is dedicated to increasing the use of recycled water in the future. Although the District's program does not include any groundwater recharge projects, a significant amount of the water supplied by this program is used for landscape irrigation. This amount is also expected to increase as the District actively works to extend its distribution system to reach additional users.

The District supports the findings of the *Monitoring Strategies for Chemicals of Emerging Concern (CECs) in Recycled Water - Recommendations of a Scientific Advisory Panel* (Panel Report), and, as consistently stated by those testifying at the State Water Board's December 15, 2010 hearing, the District urges the State Water Board to adhere as closely as possible to the Panel's recommendations.

While the Staff Report generally does reflect the Panel's findings, the District is concerned that in several instances the State Water Board's intention to implement recommendations regarding landscape irrigation is not made entirely clear. These concerns are twofold: (1) because ambiguous language could be easily misinterpreted in future permitting processes and lead to unwarranted monitoring requirements, and (2) because unclear direction regarding recycled water regulations is directly in conflict with the regulatory-streamlining goals described in the State Water Board's Recycled Water Policy (Resolution 2009-0011), the very basis of this recent work on CECs.

The most important finding in the Panel Report related to the District's current recycled water program is that, based on an evaluation of the public health risks associated with CECs in recycled water used for landscape irrigation, none of these chemicals were

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deemed to be of concern for monitoring. This idea is clearly reiterated on Page 4 of the Staff Report, which includes the statement: "Monitoring for health-based CECs and performance-based indicator CECs is not recommended for landscape irrigation projects..." However, subsequent sections of the Staff Report are confusing, as there is not always a clear distinction between the staff's recommendations related to monitoring CECs in recycled water used for landscape irrigation versus that used for groundwater recharge projects. Several specific examples of potentially conflicting language are included in the following bullets.

- Page 4, last paragraph: *"The recommended points of monitoring presented above are for the purposes of monitoring CECs, and are in addition to any other monitoring requirements required by the CDPH and the Regional Boards for a groundwater recharge/reuse or landscape irrigation project using recycled water."*

This language is misleading because the referenced points of monitoring are clearly indicated only for groundwater recharge/reuse projects, not for landscape irrigation projects.

- Page 5, first paragraph: *"Monitoring requirements for CECs at recycled water facilities should require an initial assessment of CECs in the facilities' recycled water..."*

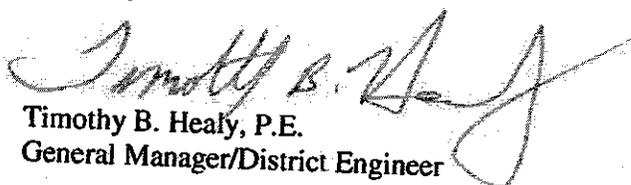
This and subsequent language is confusing because it suggests that CEC monitoring requirements should apply to all recycled water facilities, which contradicts the Panel Report's finding that CEC monitoring is unwarranted for landscape irrigation projects.

The District asks that the State Water Board clarify recommended monitoring requirements to ensure consistency with the Panel Report. Specifically, with regard to landscape irrigation projects, it should be clear that:

- Monitoring requirements are recommended for three surrogate parameters: chlorine residual, total coliform, and turbidity, and
- Monitoring requirements are not recommended for any specific health or performance-based CECs.

Thank you for your consideration of these comments. Please let me know if you have any questions or would like additional information.

Sincerely,


Timothy B. Healy, P.E.
General Manager/District Engineer