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July 2, 2012

Via E-mail

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814  
([commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov))

Dear Ms. Townsend:

**SUBJECT: Comment Letter – Amendment to the Recycled Water Policy**

Eastern Municipal Water District (EMWD) appreciates the opportunity to provide comments on the State Water Resources Control Board draft amendment to the Recycled Water Policy that would add monitoring requirements for constituents of emerging concern (CECs) for recycled water. As the provider of both water and water reclamation services, EMWD shares responsibility to effectively manage the surface and groundwater basins within our District boundaries. Thus, we support the State's goal to encourage the beneficial use of recycled water in a manner that protects both surface and ground water in a transparent and scientifically defensible manner.

EMWD currently provides potable water and water reclamation services to 755,000 people in a service area of 542 square miles. Two (2) Water Filtration Plants and one (1) Desalinization Facility, in addition to MWD connections and local wells, provide potable water to the customers the District serves. Additionally, four (4) water reclamation facilities provide wastewater services to a portion of western Riverside County which include a number of cities. These four water reclamation facilities produce about 45 million gallons per day of tertiary treated recycled water that is distributed and utilized for agricultural, irrigation, landscape, industrial and environmental uses. Additionally, EMWD has the ability to store more than 2 billion gallons of recycled water. Recycled water plays an important role in achieving our goal of developing a drought-proof and sustainable water supply for our customers.

**Mailing Address:** Post Office Box 8300 Perris, CA 92572-8300 Telephone: (951) 928-3777 Fax: (951) 928-6177  
**Location:** 2270 Trumble Road Perris, CA 92570 Internet : [www.emwd.org](http://www.emwd.org)



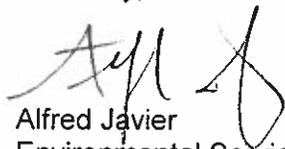
EMWD appreciates the intent of the draft amendment to the Recycled Water Policy and that, for the most part, it supports the recommendations of the CEC Scientific Advisory Panel's recommendations in their June 25, 2010 report entitled, *Monitoring Strategies for Chemicals of Emerging Concern (CECs) in Recycled Water – Recommendations of a Scientific Advisory Panel*. EMWD supports the comments and concerns submitted by the Southern California Alliances of POTWs (SCAP), California Association of Sanitation Agencies (CASA) and Tri-TAC. As the SCAP and CASA/Tri-TAC comment letters are very thorough and detailed, EMWD will only emphasize on a few points of concern.

EMWD concurs with the SCAP and CASA/Tri-TAC comment letter in regards to the clarification that is needed in the monitoring location for priority pollutant monitoring for landscape irrigation. The monitoring location should specifically state that it is the *recycled water* that should be monitored for priority pollutants. EMWD would also like to take note of the requirement of monitoring for priority pollutants in recycled water used for landscape irrigation twice per year, as opposed to having an annual requirement. EMWD has sampled its recycled water from each of its four water reclamation facilities annually for priority pollutants for many years now. Only a handful of these priority pollutants are ever detected above the method detection limit, with an even smaller subset at or above specified permit trigger levels. EMWD believes that annual sampling of priority pollutants remains a sufficient monitoring frequency for recycled water utilized for landscape irrigation projects.

As much consistency as possible with California Department of Public Health's (CDPH) November 2011 draft groundwater recharge regulations should be sought in regards to monitoring requirements and location. EMWD would like to emphasize that CDPH should be the lead for groundwater recharge projects and in establishing CEC monitoring requirements for those projects utilizing alternative treatment processes, and not individual Regional Water Quality Control Boards (RWQCBs). Additionally, the Regional Boards should not have the discretion to increase surrogate monitoring beyond those that are listed in Table 2 of Attachment A of the draft amendment, for both groundwater recharge and landscape irrigation projects. This is important to ensure consistency across different Regional Boards and is especially critical for agencies, like EMWD, whose service areas are under the jurisdiction of more than one RWQCB.

Thank you for the opportunity to comment. If you have any questions, please feel free to contact Lyndy Lewis at (951) 928-3777 extension 4318 or at [lewisl@emwd.org](mailto:lewisl@emwd.org).

Sincerely,



Alfred Javier  
Environmental Services Manager

AJ/LL:tlg

cc: Records Management