



Ms. Townsend,

Please find attached the U.S. Navy comments on the proposed amendment to the Recycled Water Policy to incorporate monitoring requirements for constituents of emerging concern.

v/r,
Brian S. Gordon
N45 Water Quality Program Manager (EV12)
NAVFACSW Environmental
(619) 532-2273

No.	Document	Page	Section	Comment
1	Recycled Water Policy	13	10. a. (1)	The policy states "In addition, all uses of recycled water must meet conditions set by CDPH." It would be beneficial if those conditions were clearly identified or referenced here.
2	Recycled Water Policy	13	10.a.(3) & 10.a.(4)	Based upon the statements in (3) and (4) the water board should carefully consider which CECs have toxicological AND analytical method maturity such that monitoring will produce data of known precision and bias at the concentrations of health concern. Otherwise, monitoring is a waste of resources that may not be helpful to the overall objectives of increasing water quality and reuse.
3	Attachment A	3	1.1	The second sentence of paragraph 2 states "All CECs listed for a recycled water application shall be monitored during an initial assessment monitoring phase..." Does the initial monitoring also include the evaluation of baseline/background concentrations of the CEC's? Many of the CECs may occur from the soil and/or recharge conditions. From a mass-balance approach, this is very important in understanding the natural occurrence of health-relevant CECs and/or the true benefits of performance indicators.
4	Attachment A	4	Table 1	The method reporting limit needs to be specifically defined- how is it determined, and does it correspond to a method detection limit, practical quantitation limit, or an impending regulatory limit? This is a often a source of confusion in analytical reports.
5	Attachment A	4	Table 1	The method reporting limits for each CEC should be the lowest calibrated standard for each respective method or the quantitation limit, whichever is higher. The detection limit should NOT be used for minimum reporting limits due to the uncertainty at these levels.
6	Attachment A	4	Table 1	To maximize consistency, it would be a good idea to specify what methods should be used. For example, multiple methods exist for NDMA analysis, not all of them with comparable detection limits. In addition, no EPA methods that included sucralose or DEET could be found.
7	Attachment A	4	1.1	In the second sentence of the first paragraph, recommend specifying the performance for "proven reliability". Should the laboratories performing such tests be accredited to any specific standard?
8	Attachment A	4	1.1	In the first sentence of the second paragraph, define what statute the "approved" analytical method should be under - CWA or SDWA.
9	Attachment A	5	1.2	The third paragraph states "where applicable, surrogates may be measured using in-line or hand-held instruments provided that instrument calibration procedures are implemented in accordance with the manufacturer's specifications and that calibration is documented." Recommend appropriate methodologies, reporting limits, performance criteria be included for the surrogate methods.
10	Attachment A	7	3	This guidance should specify how the monitoring decision points will be set and documented for each phase. For example, this section stipulates that the list of constituents to be measured be refined based upon the monitoring results and findings of the previous phase. How will this refinement be documented?
11	Attachment A	8	3.1	Third sentence of paragraph 2 states "Performance indicator CEC and surrogate monitoring results that demonstrate measurable removal for a given unit process shall be candidates for use in the monitoring programs for the baseline and standard operation phases." Recommend defining "measurable removal."
12	Attachment A	14	4.1	Removal Differential Equation: If the removal differential is to be reported as percent, the equation should be multiplied by 100. Also, the ambient concentration in the aquifer prior to application of the recycled water should be included in this equation.
13	Attachment A	15	4.1.1	What are "other sources", and how is that dilution calculated?
14	Attachment A	16	Table 6	What is the decision process if the analytical detection capabilities are unable to meet the monitoring results and expected removal efficiencies and/or health-relevant trigger levels?