



REGIONALSAN

TAKING THE WASTE OUT OF WATER

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December 2, 2014

Tessa Fojut
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95624

Subject: Comments on the October 2014 Preliminary Draft for Discussion Pyrethroid Basin Plan Amendment Language

Dear Ms. Fojut:

The Sacramento Regional County Sanitation District (Regional San) appreciates the opportunity to provide comments on the October 2014 Preliminary Draft for Discussion Pyrethroid Basin Plan Amendment (BPA) Language. We support the Water Board's use of stakeholder processes in developing BPA's, and are willing to work collaboratively with regulatory agencies in achieving technically and scientifically sound standards and policies. The ability to express concerns early in the basin planning process, and work through issues, results in a BPA that meets the requirements of water code, and can be implemented to protect beneficial uses.

Regional San has concerns about the proposed BPA and potential adverse consequences for wastewater agencies. These concerns regard the:

- Methodology and assumptions used to derive the proposed pyrethroid water quality objectives,
- Information deficiency supporting the proposed use of the additive toxicity formula and lack of adequately approved analytical methodologies, and
- Consideration of outstanding technical concerns by the peer review panel.

California Association of Sanitation Agencies (CASA) and the Central Valley Clean Water Associations (CVCWA) have submitted detailed comment letters on the above concerns. We reference these letters for providing the detail of the above listed concerns rather than repeat the detail in this letter. Also we strongly support the peer review panel incorporating the technical questions submitted by CASA and the Pyrethroid Work Group, and encourage the Regional Water Board to avoid including policy questions to the peer review panel.

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Regional San does not support the use of the UCD-developed water quality threshold values which are being proposed as water quality objectives for the Central Valley in the BPA. We submitted comments on the UCD Bifenthrin and Lambda-Cyhalothrin Criteria in January and February 2010 expressing our concern of conservative assumptions driving derivation of criteria that analytical laboratories can not measure. We also stated that these criteria should not be used to interpret the narrative toxicity standard. Since 2010 field-based toxicity results should be added to the data set used to derive the water quality threshold values upon which the proposed water quality objectives are based. If there is still insufficient data, additional research is needed to promulgate appropriate water quality objectives for pyrethroids.

Regional San does not support the proposed use of the additive toxicity equations as proposed water quality objectives. Data to support the proposed use of the equations using pyrethroids at concentrations of the proposed water quality objectives has not been presented and is not known to exist. Unless and until such information is provided, the proposed additive toxicity objectives should not be considered.

We anticipate revisions to the BPA to be consistent with recommendations from the October and November Stakeholder Workshops, helping resolve issues regarding determining bioavailability, the monitoring and reporting program, and implementation issues for wastewater treatment plants. Regional San appreciates this opportunity to provide comments on the proposed Pyrethroid BPA and we look forward to working with you as this process moves forward. If you have any questions please contact me at (916) 876-6030.

Sincerely



Linda Dorn
Environmental Program Manager

cc: Christoph Dobson
Terrie Mitchell
Vyomini Upadhyay
Debbie Webster, CVCWA
Greg Kester, CASA