

March 2, 2018

submitted via email to keithm@sccwrp.org

Mr. Keith Maruya
Southern California Coastal Water Research Project
3535 Harbor Blvd., Suite 110
Costa Mesa, CA 92626

Dear Mr. Maruya:

The City of San Diego (City) Public Utilities Department (PUD) is providing comments on the January 31, 2018 *Draft Final Report, Monitoring Strategies for Constituents of Emerging Concern (CECs) in Recycled Water, Recommendations of a Science Advisory Panel* (Report). The City's Pure Water San Diego Program will soon produce 30 million gallons per day of highly purified recycled water for the purpose of potable reuse via surface water augmentation, with the ultimate goal of 83 million gallons per day of purified water by 2035. We are pleased that the Science Advisory Panel's Report emphasizes the safety of potable reuse practices in California. We agree with many of the Panel's recommendations in the Report, and offer feedback where we believe information should be clarified or revised.

Use of bioanalytical methods

The Panel recommends the use of bioanalytical methods for screening potable reuse projects, to assess the risk of newer CECs where little data is otherwise available. The City supports the assertion by the Panel in section 7.4 of the Report that states "...the Panel instead suggests a tiered, adaptive management strategy that minimizes regulatory restrictions by utilizing bioanalytical methods as a screening tool in conjunction with chemical analysis...". The City also agrees with the statement in section 7.5, which reads "the Panel proposes use of *in vitro* assays to... establish screening (i.e. early warning) trigger levels, rather than to establish regulatory numeric standards for compliance." We request that this same language and intent be included in the Amended Recycled Water Policy.

In terms of the decision making logic for using the results of bioanalytical screening, which is in section 7.5.3 of the Report. We are in agreement with the recommendations in this section through step 3.c., which emphasize a collaborative effort between the recycled water producer and the State Water Regional Control Board (SWRCB) in terms of addressing potential exceedances of monitoring trigger levels from bioassay results. However, we are opposed to any regulatory actions or consequences being placed on the recycled water producer as a result of bioassay monitoring. We are not in support of the recommendation given in step 3.d. of this section, which states "consider removing the RW water supply". We believe this is too severe a consequence to be based on bioassay monitoring results. We ask that the phrase "consider removing the RW water supply" be deleted.

Participation in advisory group

We request that the Pure Water San Diego Program be a participant in the bioanalytical advisory group discussed in section 7.5.5. We would like to receive timely updates regarding the specific protocols for conducting the estrogen receptor and aryl hydrocarbon receptor assays, which this advisory group will produce. Direct involvement with this advisory group will allow Pure Water San Diego to implement the proposed bioassay methods and apply these in our demonstration scale advanced water treatment facility, while preparing for bioanalytical monitoring once full scale production of purified water begins.

Bioassay trigger levels

Specific values for monitoring trigger levels for bioassay results do not appear to be provided in the Report, as they are for targeted CECs monitoring in Table 4.5. Is the panel recommending that the monitoring trigger level for the estrogen receptor shown in Textbox 7.1 should be applied for the estrogen receptor assay, or is this provided only as an example? We suggest that the bioanalytical advisory group have a role in determining the monitoring trigger levels for the bioassay results.

We thank the Panel for their consideration of our comments. If you have any questions or would like further clarification regarding this letter, please contact me at (858) 292-6402.

Sincerely,



John Helminski
Assistant Director

JH/esm