



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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March 2, 2018

Via Electronic Mail Only

Mr. Keith Maruya
Principal Scientist
Southern California Coastal Water Research Project
3535 Harbor Boulevard, Suite 110
Costa Mesa, CA 92626
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Subject: *Comments on the Monitoring Strategies for Constituents of Emerging Concern (CECs) in Recycled Water, Recommendations of a Science Advisory Panel, Draft Final Report dated January 31, 2018*

Dear Mr. Maruya:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to provide comments on the *Monitoring Strategies for Constituents of Emerging Concern (CECs) in Recycled Water, Recommendations of a Science Advisory Panel, Draft Final Report* dated January 31, 2018. CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach our mission with the perspective of balancing environmental and economic interests consistent with state and federal law.

CVCWA has a role on the Stakeholder Advisory Group (SAG) for this effort and endorses the State Water Board's approach of convening an expert Science Advisory Panel to address the complicated topic of recommending CEC monitoring in recycled water. CVCWA is a strong advocate for collaborative efforts to effectively integrate science, policy, and management actions and is appreciative of the process that has been used to allow interaction between the Science Advisory Panel (Panel) and affected stakeholders.

In addition to the comments provided below, CVCWA supports the comments made by WaterReuse, the California Association of Sanitation Agencies (CASA), Association of California Water Agencies (ACWA), and Bay Area Clean Water Agencies (BACWA) in their joint letter. CVCWA shares the concerns related to the standardization, interpretation of results and regulatory applications of various bioanalytical methods. The draft report addresses these concerns directly and provides helpful information. CVCWA appreciates that the list of assay methods was reduced to two (Aryl hydrocarbon receptor [AhR] and Estrogen receptor [ER] *in vitro* assays) through an evaluation process which considered the above concerns. However, CVCWA supports WaterReuse's comment that these bioassays be conducted on a voluntary basis rather than a mandatory requirement. Alternatively, if such biological monitoring is mandatory, we also support that the requirement should be imposed only on potable reuse facilities over a specific size—for example, 10 million gallons per day or more.

CVCWA finds the draft report to be comprehensive and well written, and compliments the Panel on its work. Specifically, we appreciate that the Panel expanded the report to consider all Title 22 uses of recycled water. CVCWA supports a number of the conclusions and statements made in the draft report, including the following:

- On page 98, the draft report notes that an overarching conclusion of the work of the Panel is that there is "...inherent low risk of CECs in recycled water to human health...". This statement is repeated in various ways throughout the report.
- On page 96, the draft report includes a recommendation that no CEC monitoring be required for non-potable reuse applications that are currently approved under Title 22 in California. This recommendation is based on a determination of low risk to human health by CECs in these applications.
- On page 71, the draft report states "The Panel acknowledges that a significant amount of work remains before a useful collection of assays is ready for regulatory application ... For the near-term, the best use of cell assays in their current state of development is to complement analytical chemistry ... in a screening approach to help identify known and unknown contaminants in reclaimed water at concentrations that may have the potential to pose a risk to human health or the environment."
- On page 48, the draft report provides an excellent summary of the multiple safety factors used in the development of the Panel recommendations. These safety factors highlight the conservatism inherent in the work by the Panel.

- On page 98, the draft report states that the Panel recommends that non-targeted chemical analysis (NTA) only be applied on a voluntary basis.

In addition to the above statements of support, we also provide the following comment on the Draft Final Report. Use of the term “Measured Environmental Concentrations” (MECs) may be confusing to some readers and we recommend modification of this term. The acronym “MECs” in the wastewater permitting context stands for Maximum Effluent Concentration. Additionally, as described in the report on page 31, the data used to define MECs is taken from either secondary or tertiary effluent (recycled water) data sets, rather than *environmental* concentrations. Modification of this term to better fit the data it is derived from and the use of a different acronym will avoid future misinterpretations.

Again, CVCWA appreciates the opportunity to provide these comments. If you have any questions, or if CVCWA can be of further assistance, please contact me at (530) 268-1338 or ecofficer@cvcwa.org.

Sincerely,



Debbie Webster,
Executive Officer

cc: Pamela Creedon, Central Valley Water Board
Adam Laputz, Central Valley Water Board