



San Diego County Water Authority

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March 2, 2018

Mr. Keith Maruya

Southern California Coastal Water Research Project

3535 Harbor Blvd, Suite 110

Costa Mesa, CA 92626

Dear Mr. Maruya and Panel Members:

The Water Authority would like to provide comments on the January 31, 2018 draft *Monitoring Strategies for Constituents of Emerging Concern (CECs) in Recycled Water, Recommendations of a Science Advisory Panel*. Recycled water is an important component of the San Diego region's water supply and diversification strategy. We appreciate the Panel's scientific expertise, their coordination with stakeholders, and dedication to developing comprehensive recommendations for CEC monitoring. We are pleased that the Panel's report emphasizes the safety of potable and non-potable reuse practices in California. We agree with many of the Panel's recommendations, and offer feedback where we believe information should be clarified or revised in the report.

Support Risk-Based Framework to Update CEC Monitoring List

The Water authority supports the Panel's use of a risk-based framework to update the list of CECs for monitoring. This approach allows for resources to be directed to monitoring constituents that pose a potential threat to human health. We agree with the Panel's recommendation that CEC monitoring for non-potable uses approved under Title 22 is not necessary due to the low potential for CEC exposure and risk.

Voluntary Implementation of Bioassay Screening

The Panel recommends the use of bioassays for screening potable reuse projects as a potential way to assess the risk of newer CECs with little available data. They have identified estrogen and aryl hydrocarbon receptor assays (ER and AhR) as sufficiently standardized and robust for screening level data collection and assessment. Although we agree with the Panel that bioanalytical screening methods are future tools that hold significant promise and should be explored over the next few years. However, we think it is premature to require this testing for potable reuse projects, and recommend that it be voluntary. As recommended by the panel, we agree that any non-targeted (chemical) analysis (NTA) should be voluntary.

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As the Panel points out, the use of bioassays in recycled water monitoring and assessment is relatively new, and there is a need for studies to evaluate these tools as regulatory requirements. For example, human health trigger levels have not yet been established. In addition, we are concerned about the availability and standardization of these methods. To ensure reliability of the bioassay data, we suggest the report recommend that the State's Environmental Laboratory Accreditation Program develop approved methods and certify laboratories for conducting the recommended bioassays. The State Board should provide a list of approved laboratories to agencies which may conduct monitoring. Data collected voluntarily should be made available to the Panel when it reconvenes to consider its use in recycled water monitoring and assessment. In the interim, a bioanalytical advisory group could be convened by the State Water Resources Control Board (State Board) to help evaluate the use of bioanalytical tools for water quality screening (page 77).

Managing Data from Potable Reuse Facilities

The report recommends that the State Board create a database for managing data from potable reuse facilities, including CEC and bioanalytical data, high-frequency monitoring data, source control data, and NTA data (page 11). Reporting of much of this data, including NTA and high-frequency monitoring data, is not currently required by existing regulations or policies, and development of a State database is premature. It appears that the recommendation for data management is focused more on future raw and finished water augmentation potable reuse projects. This recommendation should be removed from the report, since it does not apply to existing groundwater recharge and reservoir augmentation potable reuse projects.

If future regulations work in a similar manner as existing drinking water and potable reuse regulations, reporting of high-frequency monitoring data would include a subset of data related to regulatory compliance. Agencies use high-frequency monitoring data for operational purposes and to determine compliance with standards. Certified operators are responsible for optimizing treatment and for immediately responding to variances in monitoring data in accordance with their operating plan. Operators would immediately report failure conditions to the State Board.

Reporting of all high-frequency data to the State Board and storing that data would be excessive and would have little use from a regulatory perspective. This concept should be further evaluated as regulations are developed for direct potable reuse. The analysis of high frequency data for the purposes of developing regulatory requirements is more appropriate as part of a special study. The Panel's recommendation should be replaced with a suggestion that the State Board evaluate further the type of data that should be collected for future direct potable reuse projects.

Mr. Keith Maruya

March 2, 2018

Page 3

Permitting Potable Reuse Projects through DDW

We agree with the Panel (page 10) that the State Board through the Division of Drinking Water (DDW) should permit potable reuse projects that produce a raw water source or finished water source instead of the Regional Water Boards. Other than brine discharges, these projects would not typically include a waste discharge regulated by the Regional Water Boards. The DDW has the responsibility for implementing the State's drinking water programs, which includes regulating public drinking water systems under the Safe Drinking Water Act.

In conclusion, we thank the Panel for consideration of our comments as they develop the final report. If the Panel has any questions or would like further clarification regarding this letter, please contact me at (858) 522-6743

Sincerely



Toby Roy
Water Resources Manager

Sent electronically to: keithm@sccwrp.org