



May 11, 2010

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

Via email to: [keithm@sccwrp.org](mailto:keithm@sccwrp.org)

Subject: Comment letter - April 15, 2010 Draft Monitoring Strategies for Chemicals of Emerging Concern (CECs) in Recycled Water: Recommendations of a Science Advisory Panel

Dear Dr. Maruya and Panel Members:

The Southern California Alliance of Publicly Owned Treatment Works – or SCAP as we are commonly referred to – represents 84 Southern California public agencies that provide both water and wastewater treatment to nearly 18 million people in parts of Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties

SCAP appreciates the opportunity to submit comments on the April 15, 2010 *Draft Monitoring Strategies for Chemicals of Emerging Concern (CECs) in Recycled Water: Recommendations of a Science Advisory Panel* (draft report). Our member agencies treat and safely reuse or dispose of over 1 billion gallons of wastewater each day and deliver over 1.7 billion gallons of drinking water per day.

The draft report is informative and addresses the charges included in the Recycled Water Policy. The Panel should be commended for comprehensively addressing a complicated issue in a very short period of time and for its recommendations. We support the recommended framework to guide current and future prioritization of which CECs should be included in recycled water monitoring programs with regard to toxicological relevance for landscape irrigation and groundwater recharge projects. We also support the recommended methodology of using surrogate and indicator compounds for tracking water reclamation treatment performance. Both the prioritization framework and treatment performance methodology with some clarification (see below), if adopted by the State Water Resources Control Board, will ensure that CEC monitoring requirements will be consistently applied to water reuse projects.

The Panel correctly decided to only use human health significance and not ecological impacts when prioritizing compounds for monitoring CECs in recycled water used for landscape irrigation and

P.O. Box 231565

Encinitas, CA 92024-1565

Fax: 760-479-4881 Tel: 760-479-4880 Website: [www.scap1.org](http://www.scap1.org) Email: [info@scap1.org](mailto:info@scap1.org)

groundwater recharge. This decision was appropriately based on relevant exposure for both types of water reuse projects.

The Panel's step-wise approach to screening and prioritizing CECs for monitoring is appropriately conservative, yet practical. The concept of monitoring based on what we expect to find in the water in relation to the toxicological relevance is appropriate because it focuses monitoring on constituents of greatest concern. The Panel has appropriately designed the framework so that monitoring can be modified if constituents are routinely found not to be present, and has provided a workable response plan based on monitoring results.

While we are generally supportive of the overall approach (prioritization framework and treatment performance methodology) adopted by the Panel, we recommend that some detail and clarification be added to the report to assist the public, State Water Resources Control Board (SWRCB), Department of Public Health (DPH) and water recyclers like our agency with how to interpret the report. Specifically, we recommend the following:

- Clarify that the Panel's application of the prioritization framework, which resulted in the identification of three particular constituents for monitoring in association with potable reuse projects and no constituents for landscape irrigation, represents the Panel's recommendation to SWRCB and DPH that these constituents should be monitored until such time that the priority list has been reviewed and revised in accordance with other Panel recommendations.
- Clarify the roles and responsibilities for future CEC prioritization and other recommendations in the report.
- Clarify that bioassays are currently not ready to be added to monitoring programs for evaluation of unknown CECs and recommend how such bioassays should be further developed and by whom.
- Clarify the public health protection benefits of surrogate compound monitoring for irrigation projects and, if any exist, which specific surrogate compounds are recommended for tracking treatment plant performance for irrigation projects. Also, clarify which specific surrogate and indicator compounds are recommended for tracking treatment plant performance for groundwater recharge projects.

Thank you for considering these comments. If you have any questions, please contact SCAP's Water Issues Committee Chair, Valerie Housel at (909) 384-5108.

Sincerely,

A handwritten signature in black ink that reads "John Pastore". The signature is written in a cursive style with a large initial "J" and "P".

John Pastore, Executive Director.