



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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March 19, 2012

Sent via email to: keithm@sccwrp.org

Keith Maruya
Principal Scientist
Southern California Coastal Water Research Project (SCCWRP)
3535 Harbor Blvd., Suite 110
Costa Mesa, CA 92626-1437

RE: Comments on Draft Report, "*Monitoring Strategies For Chemicals Of Emerging Concern (CECs) In California's Aquatic Ecosystems*"

Dear Mr. Maruya:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit these comments on the draft report, "*Monitoring Strategies for Chemicals of Emerging Concern (CECs) in California's Aquatic Ecosystems*". CVCWA is a non-profit organization representing more than 50 publicly owned treatment works (POTWs) throughout the Central Valley Region in regulatory matters affecting surface water discharge, land application, and water reuse. We approach these matters with a perspective to balance environmental and economic interests consistent with state and federal law.

Our members, primarily public agencies in the Central Valley, would be most impacted by the report's assessment and recommendations pertaining to Scenario 1: wastewater treatment plants (WWTPs) discharging to effluent-dominated waterways. We generally agree with the reports' recommended approach of an adaptive, multi-phased approach for implementing CEC monitoring programs for WWTP effluent and stormwater discharges to receiving waters of the State and believe that the guidance summarized in Table 8.2 of the report appropriately limits the initial monitoring effort for effluent-dominated waterways to a pilot study involving one POTW and one receiving water. The recommendations for monitoring programs should

emphasize regional ambient monitoring programs as the preferred approach rather than an approach that would impose requirements on individual dischargers.

In addition, we appreciate the effort to limit the number of constituents to be monitored based on the risk-based screening framework. For effluent dominated freshwater systems, eleven compounds have been identified for which monitoring is recommended (i.e., hormones including *17-beta estradiol, estrone and cis-androstene-dione*; insecticides including *bifenthrin, permethrin, chlorpyrifos, and fipronil*; and pharmaceuticals and personal care products including *ibuprofen, bisphenol A, galaxolide, diclofenac, and triclosan*). The process used to identify these compounds relied on conservative assumptions, using large safety factors and biological end points that go beyond the typical effects that serve as the basis for water quality criteria. Therefore, the screening criteria used by the panel should not be confused with or substituted for WQ criteria or effects thresholds.

As CEC monitoring programs move forward, CVCWA believes these monitoring programs should continue to emphasize participation in regional monitoring programs and other approaches that take into account the limited resources of many of the POTWs in the Central Valley. There are many small and/or disadvantaged communities in California facing economic challenges related to operation of and planning for wastewater disposal and water supply projects. A small rate base and low median household incomes often impact the ability of small communities to provide the necessary services and participate in data collection efforts. CVCWA is concerned that implementation of costly CEC monitoring requirements will provide additional stress on the resources of small communities. To reduce the impact on these small and/or disadvantaged communities and encourage project development, CVCWA recommends the recommended CEC monitoring frequencies and ultimate implementation strategies take into account the limited resources of these communities. This approach is consistent with the State Water Board's "Small Community Wastewater Strategy"¹ which is annually reviewed and updated to consider impacts to small communities from regulations related to wastewater treatment and water supply.

Thank you for consideration of these issues. Please contact me at (530) 268-1338 if you have any questions.

Sincerely,



Debbie Webster
Executive Officer

¹ "Promoting Strategies to Assist Small and/or Disadvantaged Communities with Wastewater Needs," Water Resources Control Board Resolution No. 2008-0048, adopted July 1, 2008.