



CVCWA Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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April 24, 2020

Via electronic mail: commentletters@waterboards.ca.gov

Ms. Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

**SUBJECT: Comments Regarding Proposed Definition of Microplastics
in Drinking Water**

Dear Ms. Townsend:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to provide comments on the Proposed Definition of Microplastics in Drinking Water. 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. CVCWA members have a strong commitment to the protection of municipal and domestic beneficial uses in Central Valley waters.

As an initial matter, we wish to compliment the State Water Board on a very informative overview of this issue at the April 7 workshop. The staff presentation was clear, thorough, and helpful in understanding both the development of the proposed definition and how it may be put to use. As acknowledged at the workshop, the proposed definition is quite broad. This may be appropriate for capturing the range of microplastics that may be present in source waters. However, the broad definition is best viewed as a category of substances that will require further refinement before analytical methods, reporting levels, and MCLs can be developed, similar to metals or other broad categories of constituents.

Health effects, ability to measure and quantify, treatability, and source control will vary based on factors such size and form (fiber versus particle). As the Board moves forward with its regulation of microplastics in drinking water, it should clearly articulate the approach to methods development (multiple approaches may be needed to address the broad range of substances), as well as how it will prioritize the subset of microplastics with the most significant health impacts. We agree with the Board that evidence concerning the toxicity and exposure of humans to microplastics is still developing, and stress that it is

important not only to confirm the presence of these substances but also to understand what these levels mean for the safety of water supplies.

In addition, while this definition is intended to be used in the drinking water context, staff have indicated that they envision the definition being applied in other contexts. Before the definition migrates into other sectors, such as wastewater and stormwater, we need to better understand the exposure pathways and risk levels associated with these potential conduits and develop methods specific to these matrices. The definition may need to be modified for these sectors. We recommend focusing on additional research regarding microplastics to inform future phases of implementation beyond drinking water.

Thank you for your consideration of our comments. If you have any questions or if CVCWA can be of any further assistance, please do not hesitate to contact me at (530) 268-1338 or eofficer@cvcwa.org.

Sincerely,



Debbie Webster,
Executive Officer