



Inland Empire Utilities Agency

A MUNICIPAL WATER DISTRICT

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January 8, 2009

Ms. Regina Patterson
Senior Administrative Assistant
Santa Ana Watershed Project Authority
11615 Sterling Avenue
Riverside, CA 92503
(951) 354-4246

RE: Comments on 2008 Progress Report for the SAWPA Emerging Constituents Workgroup

Dear Ms. Patterson,

On behalf of Inland Empire Utilities Agency, we want to thank you for the opportunity to provide comments on the first Progress Report for the Emerging Constituents Work Group.

Overall, the report does a good job of summarizing the technical work and findings presented during the past year. The recommendations are appropriate, especially given the workgroup's recognition of the limitations of current laboratory methods and of the forthcoming decision by the State Water Resources Control Board to approve the State Recycled Water Policy and create a Blue Ribbon Advisory Panel that will make recommendations on appropriate monitoring of constituents of emerging concern.

We offer the following detailed comments for incorporation into the final draft of the Progress Report:

1. It would be helpful the report could provide slightly more detail on the technical work and findings that were reviewed by the workgroup. For example, the findings of Jorg Drewes and other researchers that demonstrated the effectiveness of Soil Aquifer Treatment is one of the most relevant and valuable findings that has come out of current research. It is worthy to note the default call for "more" treatment may actually result in actions that can interfere with effective natural treatment (by removing the organic carbon that feeds the microorganisms that degrade ECs during soil-aquifer treatment). Without getting too technical, the paper should explain that there is a strong body of research demonstrating the remarkable effectiveness of soil-aquifer treatment; showing the beneficial role of organic carbon in the recycled water, and pointing out the need to further examine and understand the magnitude, interrelationships, and benefits from allowing soil aquifer treatment versus attempting to remove all constituents before spreading by unusual treatment.
2. Incorporate updated information about the State Recycled Water Policy and the planned State formation of the Blue Ribbon Panel in the background section as well as elsewhere in the report. Note that on page 15, the document should be amended to indicate that the Policy is scheduled to be adopted on February 3rd and the panel is required to be established within three months (in May). Further, instead of saying "it will cause many of the same issues raised by SAWPA's EC group to be elevated for statewide review," the paragraph should read: "It is fitting for the

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complex technical and policy issues discussed in this paper to be investigated fully at the statewide level. The issues have statewide and national importance; they are complex and may need the concentrated efforts of state, national, and even international experts, and major resources, to resolve; the panel's scope of work and efforts will receive more input and review at the state level and the panel may be able to consider more of the interrelated issues that are important to this region and elsewhere. While this Workgroup has focused on monitoring methods and possible development of water quality criteria, we realize that treatment technology effectiveness, soil-aquifer treatment effectiveness, and differences in types of water (recycled water, drinking water, raw water) and levels of treatment all have to be considered as part of the investigation. We suggest the inclusion of this point in the bullet points of the Findings and Recommendations as it is a significant step forward for addressing these issues Statewide.

3. Provide clarifying text for Figure 1. It is important to be clear that some of the data that would have been necessary for the workgroup to make more detailed findings has not been completed yet. The MWD/ OCWD data won't be available until mid-2009.
4. Add information concerning the risk comparison between relatively lower risk from ECs versus other contaminants that are currently regulated at much greater allowable levels and commonly found in drinking water. There is some good language and examples on that topic, along with the concept of the relatively minute levels of the EC compounds that are being discussed, in the Shane Snyder testimony to Congress. It could perhaps help put together a brief, relatively non-technical, and forceful few sentences on those matters.
5. Add an annotated bibliography and listing of where the published references can be obtained.

Thank you again for considering IEUA's comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Martha Davis', written in a cursive style.

Martha Davis, Executive Manager of Policy Development

cc: Richard W. Atwater
Marvin Shaw
LeAnne Hamilton