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**From:** Kunysz, Kathy [mailto:kkunysz@mwdh2o.com]  
**Sent:** Thursday, January 08, 2009 9:07 AM  
**To:** Regina Patterson  
**Subject:** Comments on draft Emerging Constituents report for forwarding to Tim Moore  
**Importance:** High

Regina-  
These are my comments on the EC Report for Tim Moore.  
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Metropolitan Water District  
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I have some general concerns with the structure and tone of the draft report. The report is to summarize the results of the Phase 1 effort conducted during 2008. Paragraph 2 on page 4 outlines the types of activities of the Workgroup that are to be summarized. A key activity was to hear experts discuss their experience, findings, views, recommendations, etc regarding EC monitoring. The paper does not uniformly summarize the presentations by the experts, and, as a result, some key considerations have been left out of the summary. I recommend that the paper be revised to identify the experts and to more fully summarize the points that were made in their presentations.

Page 5. Footnote 7. Footnote should make it clear that it is the ability to detect these constituents that is emerging. It is not concern that is emerging.

Page 9. Recommend inserting paragraphs (points five, six, etc) to discuss: 1) Jorge's findings for soil aquifer treatment-- what was removed, what was persistently not removed, his concerns for extensive up-front treatment (microfiltration, UV, etc) for removal of nutrients supportive of soil aquifer treatment. 2)Shane Snyder's concerns for knee-jerk policy—let's remove everything to be safe—without scientific documentation that the EC is harmful to health (if it's harmful let's remove it from toothpaste) and without careful consideration for the energy requirements and dollar costs of treatment.

Page 9, paragraph 3. I question the use of the word 'surrogate'. If many of the ECs are eliminated by treatment, sunlight, soil aquifer treatment, then the persistent ones aren't surrogates—they're what's left. Yes, the idea is to have an indicator of the presence of wastewater elements, but I thought we heard that percolated recycled water was pretty darn clean. We need to stop referring to any water with an EC as wastewater. We also heard that some of the ECs are so ubiquitous that handling coffee in the lab must be controlled.

Page 14, paragraph 3. The Roseville issue involved proposed injection of disinfected drinking water, not reclaimed water. I spoke at length with the Central Valley Regional Board staff regarding this case. The issue was that disinfection byproducts carry some health risks. These are balanced by the benefits of disinfection. But when disinfected drinking water is injected into the aquifer, there is concern that private wells would intercept the injected water subjecting those individuals to the risks without providing the benefits.

Page 15, last paragraph. Replace 'discharger' with 'drinking water system'. This rule takes its authority from the Safe Drinking Water Act, and applies to drinking water supplies, not discharges.

Page 16, numbered paragraph 4. I question the use of the term 'surrogate'. 'Indicator' may be a more appropriate term.

Pages 15-18, Section V. Findings and Recommendations. Suggest adding a recommendation along the lines of the following: EC monitoring is being conducted for informational purposes, and not for regulatory action until such time as information is available that indicates that ECs pose significant adverse impacts. Policy regarding EC removal should carefully consider all important factors including human and environmental health, energy requirements, and costs.

Page 17, numbered paragraph 9. Word 'regulatory' in third line should be 'regularly'.

Page 18, numbered paragraph 13. Word 'ensure' should be 'ensue'.