



COACHELLA VALLEY WATER DISTRICT

Established in 1918 as a public agency

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August 6, 2020

Attn: Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Submitted via email: commentletters@waterboards.ca.gov

Dear Ms. Townsend:

Subject: Comment Letter – Perchlorate Detection Level for Purposes of Reporting

The Coachella Valley Water District (CVWD) appreciates the opportunity to comment along with other stakeholders who may be affected by the State Water Resources Control Board (State Water Board) recommendation to revise the detection limit for purposes of reporting (DLR) for perchlorate. CVWD provides domestic water, wastewater, recycled water, irrigation/drainage, regional stormwater protection and ground management services to a population of about 300,000 throughout the Coachella Valley.

CVWD supports comments submitted by the Association of California Water Agencies (ACWA), California Municipal Utilities Association (CMUA), and the California Water Association (CWA) including the following points on technological and economic feasibility:

- CVWD agrees with not opposing a reduction of the Perchlorate DLR to 2 ppb. The proposed reduction to 2 ppb is based on thorough science and does not appear to present significant challenges to the testing community. CVWD joins ACWA, CMUA, and CWA in support of lowering the perchlorate DLR to 2 ppb as an economically and technologically feasible next step in regulating perchlorate.
- CVWD also agrees that a reduction of the Perchlorate DLR to 1 ppb in 2024 and requiring the use of U.S. EPA Method 331 or 332 is not economically and technologically feasible as it would present significant economic and technological challenges to the laboratory community and would significantly increase testing costs. CVWD joins ACWA, CMUA, and CWA in recommending that the State Water Board lower the current DLR to 2 ppb and conduct another survey in 2024 to assess the capability of laboratories to meet a proposed 1 ppb DLR.

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- CVWD agrees that U.S. EPA Method 314 (Method 314) should continue to be an approved method for the detection of Perchlorate. Indeed, Method 314 is the most affordable, easily implementable, and reliable test to 2 ppb. Some laboratories already are able to reliably test down to 1 ppb using Method 314 while others are capable of refining their processes with time.

CVWD joins ACWA, CMUA, and CWA in recommending a postponement of 1 ppb DLR until a survey in 2024 can show that a sufficient number of laboratories can comply using Method 314, 331, or 332.

- CVWD agrees that a policy change of this magnitude should allow for adequate public input and joins ACWA, CMUA, and CWA in expressing concern that a 15-day comment period is insufficient to adequately assess the impacts of such a significant shift in this regulatory proposal and believe that a 45-day comment period is more appropriate.
- CVWD agrees that if the State Water Board's intent is to move as expeditiously as possible then CVWD joins ACWA, CMUA, and CWA in recommending that these two proposals, a 2 ppb DLR and a 1 ppb DLR, be separated into two distinct regulatory rulemakings.

An additional benefit of waiting until 2024 to conduct a new survey on reducing DLR to 1 ppb is that it would allow time for California laboratories to implement the State Water Board's newly adopted Environmental Laboratory Accreditation Program (ELAP) regulations including the implementation of The NELAC Institute (TNI) standards by October 2023.

Please contact me if you have any questions.

Sincerely,



Randy Mayes
Water Quality Supervisor

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