


**CONTRA COSTA
WATER DISTRICT**

 1331 Concord Avenue
 P.O. Box H20
 Concord, CA 94524
 (510) 688-8000 FAX (510) 688-8122

WQTR

August 15, 1997

Directors

 Joseph L. Campbell
 President

 James Pretti
 Vice President

 Elizabeth R. Anello
 Bette Boatman
 Noble O. Elcenko, D.C.

 Walter J. Bishop
 General Manager

**Water Quality Program
 CALFED Bay-Delta Program
 1416 Ninth Street, Suite 1155
 Sacramento, California 95814**
Attn: Carol Howe
Subject: Comments on the August 1997 Draft Component Report

Dear Ms. Howe:

The Contra Costa Water District ("CCWD" or "District") appreciates the opportunity to comment on the Draft Component Report of the CALFED Water Quality Program. The following itemized comments are submitted to you now to meet the tight CALFED schedule. The District is continuing its review of the Report and may submit more detailed comments later.

1. Figures E-1,2 (following p.E-5) and Figure 2-1 (following p.2-3): Please add the District's new Los Vaqueros intake at Old River to the Drinking Water Intakes locations identified. For completeness, please note the District's Mallard Slough intake off the Sacramento River on the side opposite to Chipps Island (south side). Please also note that the City of Antioch operates a drinking water intake on San Joaquin River at Antioch. A map of their locations is attached for your reference. added
2. Table 3-4 following p.3-16: The target values for a number of water quality parameters of concern are considerably less protective of drinking water needs than those recommended by the urban drinking water subgroup of the CALFED Water Quality Parameter Assessment Team. In particular:
 - The values for chloride (250 mg/L) and TDS (500 mg/L) would represent a relaxation of existing water quality objectives under the 1995 Water Quality Control Plan (which requires a number of days below 150 mg/L that vary according to the water year type) and SWP objectives (which has a 220 mg/L long term average and 440 mg/L monthly average), respectively. The District recommends that the lower values for TDS and chloride be adopted.
 - No MCLs were identified for pathogens. The pathogen target level of 1 oocyst/100mL for *Giardia* and *Cryptosporidium* proposed by the Parameter Assessment Team would reduce the disinfectant dosage required for water treatment and could be necessary to allow urban water agencies to meet Stage 2 of the Disinfectant/Disinfection Byproduct Rule. The District recommends that the 1 oocyst/100 ml objective be adopted. target

District

Pathogens

Carol Howe - Draft CALFED Water Quality Program Component Report

August 15, 1997

Page 2

nutrients

- The nutrient limit of 10 mg/L, might be protective of human health, but may not adequate to protect urban water reservoirs from potential algal blooms and taste and odor problems.

XP

2nd

3. Table 3.1, p.3-1: Add chloride to the list of Water Quality Parameters of Concern to Urban Uses.

done?

4. Discussion on Chloride, p.3-4: A discussion on the importance of a low level of chloride concentration in municipal supplies is warranted. The District recommends adding the following paragraph:

Chloride is used as a surrogate parameter for setting salinity standards for municipal and industrial uses, and the same concerns discussed under the heading Salinity in this section apply to chloride. Under existing standards (the 1995 Water Quality Control Plan) maximum chloride level is 150 mg/L at urban intakes in the Delta for between 155 and 240 days of the year (depending on the water year type) and 250 mg/L the rest of the year. The Contra Costa Water District has adopted a 65 mg/L chloride (and 50 mg/L sodium) goal for its delivered water quality and has invested \$450 M in its Los Vaqueros Reservoir Project towards meeting this goal.

done?

added to 3.2.0.1

5. Discussion on Disinfection Byproducts in Treated Drinking Water, p.3-4: Identifying chloride with bromide in the discussion could be misleading. Chloride in itself does not contribute to DBPs and should be removed from the subsection heading.

done? CK POC

removed chloride from this in

6. Discussion on salinity on p.3-9,10: In the first paragraph, please add "(5) health concern for people on low sodium diets" to the list on salinity concerns to municipal users. Add the following paragraph:

Chloride is used as a surrogate parameter for setting salinity standards for municipal and industrial uses. Under existing standards (the 1995 Water Quality Control Plan) maximum chloride level is 150 mg/L at urban intakes in the Delta for between 155 and 240 days of the year (depending on the water year type) and 250 mg/L the rest of the year. For water in the Delta, chloride levels of 150 mg/L and 250 mg/L correspond to total dissolved solids concentrations of about 390 and 570 mg/L respectively, and electrical conductivities of about 700 and 1050 μ S/cm, respectively.

done? ER POC

Added to 3.2.0.1

IP

Carol Howe - Draft CALFED Water Quality Program Component Report

August 15, 1997

Page 3

ACN
above
streets

- 7. Section 7: Farm runoff could be a significant source of pathogens such as *Cryptosporidium* and should be included in the section under Urban and Industrial Runoff or listed as a separate category.

The District appreciates your careful consideration of these comments. Please contact Dr. K. T. Shum at (510) 688-8083 if you have any questions.

Sincerely,

for Richard A. Denton
Water Resources Manager

Attachment. Map showing drinking water intakes not identified in Figures E-1, E-2, and 2-1 of Report.