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Mr. Robert Perciasepe
Assistant Administrator for Water
U. S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

Dear Mr. Perciasepe:

Environmental Protection Agency Comments on
CUWA's Draft Bay-Delta Drinking Water Quality Criteria Report

Thank you for your May 7, 1997 letter regarding the California Urban Water Agencies' (CUWA) draft report, "Bay-Delta Drinking Water Quality Criteria". We appreciate the efforts of you and your staff to thoughtfully consider the CUWA report and address our questions concerning future drinking water regulatory scenarios and the development of reasonable drinking water quality criteria for the Bay-Delta. The expert panel assembled by CUWA to prepare the report is currently revising the report to address comments from the Environmental Protection Agency and other interested parties. We anticipate that the CUWA report will be finalized by the end of October, and we will provide a copy to you when available.

For the December, 1996 draft CUWA report, the expert panel recommended source water quality concentrations for organic carbon and bromide in the Delta based substantially on requirements of the proposed Stage 2 Disinfectants/Disinfection By-Products (D/DBP) Rule and the Enhanced Surface Water Treatment Rule (ESWTR). To finalize the CUWA report, the expert panel is evaluating an alternative regulatory scenario based on the proposed Stage 1 D/DBP Rule and the interim ESWTR currently being considered as part of the Federal Advisory Committee Act (FACA) talks on the upcoming Microbial and Disinfection By-Product (DBP) rules. The analysis of this less stringent regulatory scenario will provide a broader understanding of the impacts of a range of possible microbial and DBP regulations on source water quality requirements. We believe that the evaluation of this alternative regulatory scenario will be important for the development of CALFED water quality target levels that can be used to evaluate the CALFED alternatives with respect to improvements in drinking water quality.

In the final report, the expert panel will also evaluate the cost, residual disposal options, and feasibility of using GAC or membranes as necessary under both regulatory scenarios evaluated, and will assess the potential impacts of regulation of individual trihalomethanes (THMs) as part of the Stage 2 D/DBP Rule. The final CUWA report will also include an

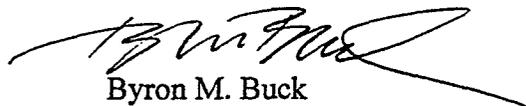
assessment of the feasibility and cost of available technologies to remove bromide from source waters, as well as to remove bromate from treated waters after it is formed.

California urban water providers operate under the long-standing policy that cost-effective and proven treatment technologies are only one component in assuring a high quality drinking water supply for our consumers and in protecting public health. Another critical component is protecting the quality of drinking water sources through the implementation of source control programs. As CALFED moves forward in developing a long-term Bay-Delta solution, we have a significant opportunity to put source water quality protection principles into practice and to develop actions to ensure a safe source of drinking water for many Californians.

While we recognize that some components of the ultimate Bay-Delta solution, like the Ecosystem Restoration Program Plan, may provide improved water quality, as drinking water suppliers we have a responsibility to take an active role in ensuring improved water quality. CUWA urges EPA to actively participate in the CALFED process to underscore the need for source water quality improvement in the Delta. Water quality needs for drinking water supply should be allocated a level of importance similar to the needs for environmental purposes. We believe an active role by the Drinking Water Division of Region IX, EPA in the CALFED process should be part of EPA's National Water Program Agenda for 1997-1998 for the implementation of new programs for protecting sources of drinking water.

CUWA is hopeful that we can continue to work together on the development of appropriate Bay-Delta drinking water quality criteria and effective source water protection programs, and to provide assistance to CALFED on the evaluation of drinking water quality impacts of various CALFED alternatives. We look forward to working with you and Region IX staff to address the critical issue of protecting the water quality of Bay-Delta drinking water supplies.

Sincerely,



Byron M. Buck
Executive Director

cc: Mr. Bruce Macler, Region IX, EPA
Mr. Lester Snow, CALFED
Mr. John Coburn, SWC
Mr. Robert Hultquist, DHS
Ms. Cynthia Daugherty, US EPA