

July 2, 2008

Office of Regulations and Hearings
California Department of Public Health
MS 0507
1501 Capitol Avenue
P.O. Box 997377
Sacramento, CA 95899-7377

Re: Revised Drinking Water Standard for Arsenic, DPH-04-017

To Whom It May Concern:

The California-Nevada Section of American Water Works Association (AWWA) offers the following comments on the California Department of Public Health's (CDPH) proposed revision to the drinking water standard for arsenic, regulation package DPH-04-017:

Section 64432(b) calls for "initial monitoring for an inorganic chemical within six months following the effective date of the regulation establishing the MCL...". AWWA requests that CDPH consider an allowance to grandfather previous monitoring data in the case of the proposed arsenic drinking water standard. Water systems in California have been monitoring for arsenic under the federal standard of 0.010 mg/L since January 2006 using the same detection limit for reporting purposes (DLR) proposed in the CDPH regulation. Therefore, it seems appropriate to allow water systems to grandfather arsenic data to meet initial monitoring requirements provided that arsenic has been tested within the time period specified in the ongoing monitoring requirements for inorganic chemicals.

In Section 64447.2 Best Available Technologies (BAT), the revised regulation included electro dialysis and oxidation/filtration as BAT for arsenic treatment. However, this revision does not include iron-based adsorption media as BAT for arsenic treatment. These iron-based media, such as granular ferric hydroxide (GFH) or granular ferric oxide (GFO), have been widely piloted and have demonstrated their effectiveness for arsenic treatment. CDPH also permitted several systems using iron-based media for arsenic treatment. AWWA requests that iron-based adsorption media be considered as BAT for arsenic treatment.

AWWA also noticed that point-of-use/point-of-entry (POU/POE) is not included in the proposed arsenic regulations as a treatment alternative for the removal of arsenic in drinking water. POU/POE is an effective and feasible way for smaller systems to remove arsenic and is approved

by the United States Environmental Protection Agency (USEPA). We believe CDPH should seek the needed authority to implement this treatment alternative.

Thank you for the opportunity to comment on this proposed standard. If you have any questions or require additional information, please contact me at 714-535-7711, extension 218.

Sincerely,

Tim Williams
Chair
California-Nevada Section
American Water Works Association