



**Strawman Proposals to Guide the Policy Discussion
at the CV-Salts Executive Committee Meeting on 7/19/2012**

Please review the white paper entitled: "Salinity Effects on MUN-Related Uses of Water" prepared by Dr. Richard Meyerhoff of CDM-Smith, Inc.

- 1) The existing numeric water quality objectives for TDS, chloride and sulfate should be deleted from the current Basin Plan.
 - A) These objectives are based on the recommended Secondary Maximum Contaminant Levels (SMCLs) and are only intended to address aesthetic concerns such as taste and odor.
 - B) These SMCLs were accidentally included (by reference) when the Basin Plan was amended to adopt water quality objectives for constituents with established Primary Maximum Contaminant Levels (PMCLs).
 - C) Most other Regional Water Quality Control Boards (#1, 3, 5, 6, 7 & 9) have not adopted the SMCLs as binding water quality objectives in their respective Basin Plans.
 - D) The Basin Plan already contains narrative standards regulating the discharge of wastes to prevent nuisance conditions including objectionable tastes or odors in drinking water supplies.
 - E) The degree to which specific levels of TDS, chloride or sulfate are acceptable to consumers depends on the specific form of the constituent (e.g. sodium sulfate vs. calcium-sulfate) and the presence or absence of other major anions and cations that may mitigate or aggravate the objectionable qualities.
 - F) The TDS, chloride and sulfate levels "recommended" in California's Secondary Drinking Water Standards are based on the lower threshold of detectable changes in taste.
 - G) The SMCLs were originally intended to govern the quality of delivered drinking water not discharges to receiving waters that may serve as raw water supplies for municipal distribution systems.

- 2) The Implementation chapter of the Basin Plan should be revised to indicate that the SMCLs will be used as one of several factors that the Regional Board will rely on to assess attainment of and compliance with the narrative objectives prohibiting nuisance (based on the following table):

Constituent	Preferred Range	Acceptable Range <i>(long-term consumption)</i>	Tolerable Range <i>(short-term consumption)</i>
TDS or Specific Conductance	≤500 mg/L or ≤900 uS/cm	501 - 1,000 mg/L or 901 - 1,600 uS/cm	1001 - 1,500 mg/L or 1,601 - 2,200 uS/cm
Chloride	≤250 mg/L	251 - 500 mg/L	501 - 600 mg/L
Sulfate	≤250 mg/L	251 - 500 mg/L	501 - 600 mg/L

A) Preferred Range =

B) Acceptable Range =

C) Tolerable Range =

- 3) Where the constituent concentrations in a discharge are greater than the Preferred Range but lower than the average concentration in the affected receiving waters, such discharges should be permitted on the basis that it would result in a net improvement to water quality.
- 4) Where the constituent concentrations in a discharge are within the Preferred Range, such discharges should be permitted, pursuant to the Recycled Water Policy, even if higher than the average concentration in the receiving water because doing so would not adversely affect existing or probable MUN uses and would provide maximum benefit to the people of California.