

## Meyerhoff, Richard

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**From:** Carlucci, Carl@Waterboards <Carl.Carlucci@waterboards.ca.gov>  
**Sent:** Monday, August 01, 2016 12:27 PM  
**To:** Meyerhoff, Richard; Daphne Orzalli  
**Cc:** Creedon, Pamela@Waterboards; Forbes, Cindy@Waterboards; Hinrichs, Richard@Waterboards  
**Subject:** Draft Policy No. X: Secondary Maximum Contaminant Levels

**Follow Up Flag:** Follow up  
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Hi, Richard Hinrichs and I reviewed the Draft Policy No. X: Secondary Maximum Contaminant Levels and we have the following comments:

- The draft policy includes some discussion and comments about whether secondary standards are health related. Certainly as mentioned for high levels of manganese, there can be potential health effects for some secondary standards constituents. Section 116275 of the CH&SC uses the wording “public welfare” in the definition of secondary standards. We believe that “public welfare” is not the same as “public health” as “public welfare” infers economic damages (purchase of bottled water or home treatment units) or damage to laundry and plumbing fixtures.
- There is also discussion regarding the enforcement of secondary standards. The regulations starting at Section 64449 explain how secondary standards are enforced and how community water systems can apply to SWRCB for a waiver from one or more secondary standards if certain steps and procedures are followed.
- There is discussion regarding how environmental samples should be collected for metals regulated as secondary standards – should they be filtered or not. If the samples are filtered, the draft policy suggests that 0.45 micron filter paper be used. With respect to drinking water, samples for total metals are not filtered for compliance purposes. In addition, most groundwater sources and some surface water sources (i.e., Hetch Hetchy Reservoir that supplies the City of San Francisco and Groveland CSD) are not filtered. If particulate metals enter the environment, either to surface water or groundwater, what is the fate of these particulates? We recommend that this be reviewed further.
- The draft policy states that many of the SMCLs are primarily intended to address aesthetic qualities, such as taste and odor, or minimize risk of corrosion of pipes; they are not intended to address human health concerns. We suggest that the wording “corrosion of pipes” be revised to “corrosion of pipes, fixtures, valves, and other plumbing materials”.

If you have any questions, please contact Richard or me. Thanks

*Carl L. Carlucci, P.E.*

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