From:	Christopher.Connor@chandleraz.gov
To:	Water Quality Guidance Document
Subject:	City of Chandler Comments
Date:	Wednesday, June 24, 2020 3:55:23 PM
Attachments:	CAP WQ Chandler comments.pdf

Good Afternoon,

Please see attached letter with the City of Chandler's comments on the Draft Water Quality Guidance document.

The City appreciates the opportunity to engage and comment on the document. We look forward to further communications about the process.

Thank you,

Chris Connor
Utility Regulatory Affairs Manager
Public Works & Utilities
City of Chandler
Desk: 480.782.3586 | Cell: 480.442.8632

CHANDLER arizona
Community of Innovation

June 24, 2020

Central Arizona Project
23636 N. 7th St.
Phoenix, AZ 85024

Re: Water Quality Guidance for the Introduction of Non-Project Water into the Central Arizona Project

Dear CAWCD and Bureau of Reclamation Staff and Leadership,

The City of Chandler appreciates the opportunity to comment on the Draft Water Quality Guidance Document for the Introduction of Non-Project Water into the Central Arizona Project. The City recognizes the considerable effort that CAP, BOR, and stakeholders put forth to draft this documentation. The process to get to this point was considerable for all parties, but we view it as a necessity as the water quality of the canal is of the utmost importance.

Our specific comments and questions are listed below. Overall, the City of Chandler believes the document provides a good baseline to start a water quality program for CAP and its users. Further dialogue and development will be needed in order to finalize the document. We, like all stakeholders, look forward to future discussions as the process moves forward.

Sincerely,

John Knudson
Public Works & Utilities Director

Comments

Section 2.1 *CAP Water Quality*

"It [CAP water] meets most (if not all) established primary drinking water standards, and requires minimal treatment prior to delivery for potable uses."

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Comments: Omit this sentence. This overstates the readiness of the CAP water for consumption and minimizes the municipalities' role in providing safe drinking water. Though CAP water meets some of the EPA drinking water standards, it is far from ready for consumption. Municipalities spend millions of dollars every year to treat CAP water to meet all County, State, and Federal drinking water regulations in order to ensure the safety of our citizens. We understand that this sentence is already being redrafted and appreciate the effort to expedite the changes.

3.4.1.3 and 4.2.3 *Chain of Custody (COC)*

"Laboratories must receive the COC documentation submitted with each batch of samples and sign, date, and record the time the samples are transferred. Laboratories will also note any sample discrepancies (e.g., labeling, breakage). After generating the laboratory data report for the client, samples will be stored for a minimum of 30 days in a secured area of the lab prior to disposal."

Comments: Omit these sentences. These are all covered by each lab's Quality Assurance Program Manual (identified in the previous sentence) and do not need to be restated here. The requirement to store the sample for 30 days is also not needed. A lot of tests have holding times much shorter than this. For example, nitrate must be tested within 48 hours of collection. Any test for nitrate after the hold time window of 48 hours is not valid.

3.4.1.5 *Initial Analysis Sampling – Surface Water*

"...samples must be collected quarterly for a minimum of one year (February, May, August, November)."

Comments: Why these months, specifically? Just for ease of data collection?

4.3. *Sampling Frequency*

Comments: The framework of testing for everything quarterly for the initial two years and then reducing testing if there are no issues is sound. We would like to see a requirement

for more extensive testing if there is treatment on the non-project water. For example, if the non-project water being delivered into the canal comes from wells that are being treated for arsenic, then the discharge should be tested for arsenic monthly.

6.2 *Modeling*

"All modeling will be performed by CAWCD and shared with Reclamation results may be made available to Wheeling Entities and water users upon request."

Comments: Modeling results need to be shared with all CAP stakeholders, preferably online, in as close to real time as possible. Stakeholders should not need to send in a request for the data.

7.2.2 *Exceedance of Introduction Standards – Ongoing Monitoring Period (Tier 2)*

"Introduction of Non-Project Water must cease immediately and may not resume until an approved remedy can be implemented."

Comments: We agree with ceasing operation of a project upon a verification sample exceeding a limit. However, how is the project going to get shut off? Does this mean the CAP will have control of the operation or discharge of the project?

We would also like to see a way for projects to be turned off if a downstream user detects something that could be attributed to the non-project water. For instance, if a water treatment plant detects abnormally high arsenic in the canal and there is a project upstream that treats for arsenic, the possibility exists that the treatment has failed. It may be prudent to shut down the project immediately if the water is causing harm downstream.

"If, at the time of cessation, the cumulative volume of Non-Project Water introduced by Wheeling Entity, after accounting for any applicable losses, exceeds the amount delivered by CAWCD to that point in time, CAWCD will continue to satisfy the Non-Project Water delivery schedule up to the point where the Wheeling Entity's delivered water, less applicable losses, is equal to the volume of introduced water. The Wheeling Entity must consult with CAWCD to determine availability of water to be delivered."

Comments: Additional clarification is needed in this section. Can CAP provide an example?

Additional comments, in general:

We would like to see a formation of a Water Quality technical or advisory group. A small group of experts made up from CAP stakeholders could assist CAP and Reclamation on interpreting test results, advise staff on decisions regarding water quality and non-project water blending, and keep entities informed on new water quality issues and changing regulations.

We would also like to see some narrative standards added to the document. There are a number of issues that could be problematic for downstream users that wouldn't directly exceed a standard. For instance, it's possible that a project could discharge nitrate in small enough quantities that is doesn't exceed the Delivery Standard downstream, but it could be enough nitrate to proliferate an algae bloom close to the point of discharge. The algae in the canal could create physical issues downstream by clogging intakes or treatment structures.

The other reason to add narrative standards would be to cover unregulated compounds that aren't already listed in Table A-2. A current example would be the increasing amount of PFOA/PFOS compounds that are being identified. There are no current regulations for individual PFOA/PFOS compounds in Arizona, but there have now been over 70 compounds identified in drinking water. Research on and creating drinking water limits for PFOA /PFOS is ongoing. However, the presence of these compounds in water is an issue that the public is well engaged in. It would behoove all stakeholders to not allow these compounds in the canal at any detectable level.