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January 22, 2021
Central Arizona Project
23636 N. 7th St.
Phoenix AZ, 85024

Re: Updated Draft - Water Quality Guidance: For the Introduction of Non-Project Water into the Central Arizona Project

Dear CAWCD Staff and leadership,

Scottsdale Water would like to thank CAWCD staff and leadership for supporting this process and for continuing an open dialogue. The opportunity to give input and comments to this document will ultimately result in a better foundation for creative and viable options for new water supplies.

The comments we have to individual sections are detailed in the following pages, and although seem numerous in quantity, are a part of an effort to make this the best working document for all parties. While some of the comments and recommendations have to do with adjustments to verbiage others are for clarifications purposes. In addition to language modification we are asking for consideration of three compounds in Table A-1 and five in Table A-2. Those considerations and explanations can be found at the end of this document. We hope and ask that CAWCD consider our methodology and we are available for further discussion should that be warranted.

Again, we appreciate the time and resources all parties put into this process, and we are looking forward to the time when we are able to safely and appropriately wheel non-project water in the CAP canal.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Biesemeyer", with a long horizontal flourish extending to the right.

Brian K. Biesemeyer
Executive Director, Scottsdale Water



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Section 2.3 Establishment of Water Quality Standards

Table A-2; The City recommends that at the end of the discussion about this table that a sentence be added that explains that the table is divided into "regulated" and "unregulated" substances. Since Section 4.3.2 separates the use of these two sections of Table A-2 for required monitoring, it would be helpful to have this pointed out in the description of the Table.

Clarify on how "rarely or never been found" constituents translate to "historical CAP values". This section seems contradictory in these two phrases.

Section 2.4 Environmental Reviews

Please confirm that the subject NEPA process and analysis is associated with the CAWCD programmatic NEPA for wheeling.

Section 3.4.1.1 Physical Sampling Procedure

The multiple sampling procedure options (*The Southwest Region of the United States Environmental Protection Agency (EPA Region 9) has provided acceptable sampling and handling techniques. Alternatively, the USGS National Field Manual for Collection of Water Quality Data details appropriate sampling and handling procedures for both surface water and groundwater sources.*) are not consistent with other sections of the water quality guidance document that also discuss sampling procedures. The other section is 4.2.1. ("These procedures should be consistent with EPA approved methods"). If it's EPA or USGS methods it should be stated so in both sections.

Section 3.4.1.2 Laboratory

"... If no ADHS approved methods exists, then an appropriate method, approved by the USEPA, shall be used".

The city recommends that the word "approved" be replaced with the word "developed". Using the word approved implies that the EPA is in some way recommending or using a specific method in a regulation. This may not be the case. EPA has an entire research laboratory section that develops methods for use, that may or may not eventually be cited or "approved" in a regulation.

Section 3.4.1.6 Other non-Project Water

In the absence of a definition for heavily or highly "impaired water sources" we recommend that the focus of this section be solely on effluent. Otherwise, this section conflicts with Section 3.4.6 Water Treatment Plan which clearly outlines that non-Project Water will require treatment that is acceptable.

Section 3.4.7 Modifications to non-project source supply

Please define "modified groundwater wells". To what extend does an existing well qualify as being modified? Existing wells routinely need updated parts, however, it's unclear as to the demarcation line between well

maintenance and modification, which leaves this up for interpretation adding to uncertainty with reporting and operations.

4.2.1 Physical Sampling Procedures

"A permanent water sampling station (e.g., raw water tap) will be constructed within the turn-in structure/pipeline that will allow for an accessible and consistent point of obtaining a representative grab sample for analysis by the Wheeling Entity."

We recommend the language be changed to: *"A permanent water sampling station (e.g., raw water tap) will be constructed between the turn-in structure and the blending point at a location that is amenable to CAWCD and the Wheeling Entity. This point must be at a safe, accessible, and consistent point for obtaining a representative grab sample for analysis by the Wheeling Entity and agreed upon by both parties."*

The multiple sampling procedure options (EPA, USGS) noted in previous section 3.4.1.1 are not consistent with section 4.2.1 (USGS method is missing).

Section 4.2.2 Laboratory

".... If no ADHS approved methods exists, then an appropriate method, approved by the USEPA, shall be used."

The city recommends that the word "approved" be replaced with the word "developed". Using the word approved implies that the EPA is in some way recommending or using a specific method in a regulation. This may not be the case. EPA has an entire research laboratory section that develops methods for use, that may or may not eventually be cited or "approved" in a regulation.

Section 4.3.2 Supply Classifications; Type A, Type B & Type C

There is a disconnect between the main paragraphs and the bulleted list below them. Clarification is needed as to what the requirements of the bulleted list is in reference to (i.e. the following must...).

Section 5.2.1 Water Quality Reporting

The City recommends that the requirement for notification of an exceedance of an Introduction Standard be reported within 48 business hours.

Section 5.2.3 Planned Operational Changes

We recommend that some kind of emergency clause be added to the 14-day requirement. Circumstances may arise, such as a well shut down, that is spontaneous and does not provide the opportunity to give a 14-day notice.

"CAWCD may require the Wheeling Entity to model potential impacts to water quality."

The City suggests adding language that includes an alternative to modeling and give the entity the option to be able to obtain physical samples or perform mass balance calculations in lieu of modeling to ensure compliance in the event of an operational change.

Section 5.2.4 Water Quality – Annual Report

The City recommends that “water quality data” being requested in the annual report be defined as a summary table and not laboratory reports. It is already stated in Section 5.2.2 that laboratory reports must be retained for five years so the raw data is available upon request.

Section 6.2.1 Exceedance of Introduction Standards – Proving Period

The City recommends that both time frames outlined in this section be changed to reflect business hours. Therefore, the wording would now say “10 business days” and “48 business hours”.

Section 6.2.2 Exceedance of Introduction Standards – Compliance Monitoring

The City recommends that both time frames outlined in this section be changed to reflect business hours. Therefore, the wording would now say “10 business days” and “48 business hours”.

Section 6.2.3 Exceedance of Introduction Standards

We recommend the following changes to wording in the first sentence. It is standard protocol for the City to take split samples when a regulatory entity takes a sample in our systems.

*CAWCD and Reclamation may collect water samples at the Wheeling Entity's permanent water sampling station at an **arranged** time **to allow for split sampling**.*

Section 6.2.4 Cessation after Tier 2 exceedance.

This section remains unclear. The City recommends language that is more concise and understandable. An example of what that could look like is the following:

“If a wheeling entity has a Tier 2 exceedance, the cessation of delivery will be required to occur. If at the time of the cessation (during that calendar year) more non-project water was introduced in the canal than has been delivered to the wheeling’s take out delivery point, CAWCD will continue to satisfy the non-project delivery schedule for the volume that was received into the canal. The Wheeling Entity must consult with CAWCD to determine availability of water to be delivered”.

7.1 Indemnification

We recommend that this section be removed entirely. This document is guidance and non-binding. Indemnification language is most appropriate in the Wheeling agreements.

Table A-1

We request that aluminum be changed to a combination standard with a standard for both dissolved and total aluminum. We recommend that the dissolved aluminum introductory standard be retained at the originally proposed 50 ppb and a new introductory standard for total aluminum be created at 200 ppb. Aluminum is currently regulated under a National Secondary Drinking Water Standard with a range of 50-200 ppb. Creating a combination standard that spans this range seems appropriate and not overly restrictive based on historical values in the canal and non-project water.

	CAP Introductory Std	Proposed Introductory Std
Aluminum, Dissolved	NA	50 ppb
Aluminum, Total	50 ppb	200 ppb

In addition, after discussions with our contract laboratory they have informed us that they cannot meet the MRLs for two of the substances in Table A-1. We request that MRLs for these substances be raised as follows:

	CAP MRL	Proposed MRL
Perchlorate	2.0 ppb	4.0 ppb
Radium, Combined	1.0 ppb	2.0 ppb

Table A-2

We request that the series of Nitrosamines, i.e., NDMA, NDEA, NDPA, and NPYR, have an MRL of 10 ppt. This level falls in line with the current range of laboratory capabilities for this series of non-regulated substances. In addition, after discussions with our contract laboratory, they have informed us that they cannot meet the MRLs for one of the substances in Table A-2. We request that MRLs for this substance be raised as follows:

	CAP MRL	Proposed MRL
NDMA	2.0 ppt	10.0 ppt
NDEA	2.0 ppt	10.0 ppt
NDPA	2.0 ppt	10.0 ppt
NPYR	2.0 ppt	10.0 ppt
Monochloroacetic acid	0.001 ppb	0.002 ppb