

Trace Organics Sub-committee Meeting 11/16/09

Attendees: Doug Raines, Karla Fowler, Tim Gaffney, Jim McCauley –chair

On Phone: Kathy Cupps, Susan Kaufman-Una, Craig Riley, Dave Clark

Time	Topic	Decision or Action Needed
1:00 p.m. – 1:05 p.m.	Introductions, review agenda	Adjust agenda if necessary
1:05 p.m. – 1:10 p.m.	Review notes from last meeting	Approve notes
1:10 p.m. – 2:15 p.m.	Discussion of four shared email messages: 9/29 – collaborative monitoring 10/6 – CA blue ribbon panel 10/8 – CA workshop report on NWRI link 10/29 – Eugene news article and link to OR proposal for monitoring	Discuss relevance to recommendations from this subcommittee
2:15 -2:30 p.m.	BREAK	
2:30 p.m. – 3:45 p.m.	Final recommendations to RAC on PPCP and EDC issue	Discuss and formulate final recommendations
3:45 p.m. – 4:00 p.m.	Wrap up and completion of subcommittee work	To be determined by group
Next meeting	TBD	

Review of Notes from last meeting

One minor change was made to the notes from Sept. 22 to clarify that LOTT did not sample at five different treatment plants, but that and Ecology/EPA sponsored study included five plants, with two LOTT facilities represented.

Collaborative monitoring

The Dept. of Health representative asked how a Cost Benefit Analysis (CBA) or Small Business impact analysis (SBEIS) would be done on trace organics. Ecology staff indicated that this would be difficult due to the number of unknowns in terms of effects and costs. Staff will be discussing this with the individuals that are going to prepare the CBA and SBEIS.

The subcommittee discussed collaborative monitoring as described in the Stormwater General Permit Phase 1. Some members thought this concept would be difficult to apply to individual reclaimed water permit holders, especially smaller ones. Monitoring should not be a permit condition at this time, but may be added in the future when more information is known about which chemicals should be monitored and what the risks are. Collaborative monitoring may be successful if implemented as a joint voluntary effort between state, federal and municipal entities. A good example is the study that LOTT Alliance participated in with Ecology and EPA. A report of the results of this study is undergoing final review and will probably be published by the end of this year. (Lubliner, Redding, and Ragsdale are primary authors).

Terminology – what do we call these chemicals?

The group discussed the naming of these chemical compounds and considered a variety of labels including, microconstituents, contaminants of emerging concern, trace organic compounds, residual organic compounds, unregulated anthropogenic compounds, priority persistent pollutants, and compounds of potential concern. A decision was made to use the term “trace organic compounds”.

California blue ribbon panel and April 2009 workshop

The subcommittee had shared information from Gordon Innes of the California Water Resources Board regarding the cost of convening their “blue ribbon panel” of experts to evaluate the research that has been done on chemical compounds in the environment and offer recommendations. A \$300,000 contract was negotiated with the CA Coastal Waters Research Program. In addition, the National Academy of Science is going to publish a study due out by the end of 2010. The DOH representative indicated that it would be unlikely for their agency to fund a workshop or panel. Ecology also indicated that budgets were already too tight for existing priority work on TMDLs and similar studies and it was very unlikely that funding would be available. Some members suggested that we follow the work being done in California and by the National Academy of Science and then further customize this data for Washington.

The group discussed a report that had been posted recently on the National Water Research Institute’s site entitled “Managing Contaminants of Emerging Concern in California”. This workshop took place in April 2009 and the report from it was just published in September 2009. The subcommittee agreed with the key recommendations of the executive summary from this report.

Conclusions and Recommendations of the Trace Organics Subcommittee

The following decisions were made regarding trace organic compounds, first by recording subcommittee suggestions during the meeting and then refining these through multiple revisions via electronic mail.

November 16, 2009 (last revised Nov. 24, 2009)

The Trace Organics Subcommittee hereby submits the following conclusions and recommendations to the reclaimed water Rule Advisory Committee:

Conclusions- At this time:

- 1. We acknowledge that there is an important need to address the many questions, concerns, and unknowns regarding the potential risks of trace organic compounds (TOrcs)¹ introduced into our environment.**
- 2. Our regulatory agencies and wastewater industries are in an information-gathering stage as to how best to address the potential effects of TOrcs on the environment. At this time, we lack sufficient data to properly evaluate the realistic potential risks or to set appropriate water quality standards pertaining to TOrcs.**
- 3. Due to the large number (over 100,000) of TOrc compounds that exist, it is neither feasible nor cost effective to conduct risk analysis on an individual chemical, individual utility, or even individual state basis.**
- 4. The NWRI workshop report dated Sept. 2009, entitled “Managing Contaminants of Emerging Concern in California,” effectively summarizes the understandings and concerns of this subcommittee, and we concur with its recommendations as documented in the Executive Summary.**

<http://www.nwri-usa.org/pdfs/CACCECReport.pdf>

Recommendations:

- 1. It is premature to require monitoring for TOrcs by reclaimed water permit holders as a permit condition. The proposed Rule should be flexible enough to allow for future monitoring requirements for TOrcs to be placed in operating permits.**
- 2. Investigative monitoring is of value and should be encouraged. Pilot studies and collaborative monitoring efforts should be led by a regulatory agency such as Ecology, DOH, or EPA. To be productive, investigative monitoring requires a well-defined plan for**
 - a. the objectives of monitoring,**
 - b. compounds that should be monitored,**
 - c. a description of the monitoring methods considered,**
 - d. acknowledgement of the technical limitations of monitoring,**
 - e. what meaningful information is sought, and**

¹ Definition: “Trace organic compounds (TOrcs)” refers to a diverse group of mostly unmonitored and unregulated chemicals that have been detected throughout our environment. TOrcs is used collectively to include pharmaceuticals, personal care products, endocrine disrupting compounds and other microconstituents or contaminants of emerging concern.

