

From: [Keith DeVore](#)
To: [Water Quality Guidance Document](#)
Cc: [Paul Gardner](#)
Subject: Town of Queen Creek Comments on CAP Water Quality Guidance Document
Date: Tuesday, June 23, 2020 10:47:29 AM
Attachments: [TOQC Comments on CAP Water Quality Document.pdf](#)

Hello,

Attached are the Town of Queen Creek's comments on the water quality draft document. I hope through our comments and the comments of others we can continue to have a discussion with CAP customers how to create a document that would better allow customers to put water into the canal.

The Town of Queen Creek has some serious concerns that the document as currently written would make it nearly impossible to put non-project water into the canal given the current introductory requirements.

We appreciate your time and we hope to continue to work through these issues.

Thank you

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Keith DeVore
Town of Queen Creek
Water Resources Manager

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TOWN OF
QUEEN CREEK
ARIZONA

June 22nd 2020
Central Arizona Project
23636 N. 7th St.
Phoenix AZ, 85024

Draft Document of the Water Quality Guidance for the Introduction of Non-Project Water into the Central Arizona Project

Dear CAWCD Staff,

The Town of Queen Creek (TOQC) appreciates the opportunity to respond to the draft document provided by the Central Arizona Project (CAP) on The Water Quality Guidance for the Introduction of Non-Project Water in the Central Arizona Project. We understand given the current circumstances it was difficult to have much of a dialogue during the webinar on this document. In the webinar CAP stated this would be a dynamic document and CAP would seriously consider all comments. We would encourage CAP to continue to have ongoing discussions on this subject and help all customers looking to introduce non-project water into the canal.

There are two main points of concern the TOQC has with this document. The first is the idea of drinking water standards in the canal. While drinking water standards are discussed, the document does not stick to drinking water contaminants. There are mention of potential contaminants that are mostly designed for soil and solid waste analysis. The TOQC believes this document should stick to drinking water standard constituents and not venture into other potential contaminants that are not equated with drinking water issues.

There seems to be confusion about source water approval standards from ADEQ for a drinking water wells yet the CAP document states it would be unable to introduce this type of water in CAP. This seems contradictory that standards would be higher for water going into the canal than they are coming out of a well that provides drinking water.

These are a few general comments that should get to the heart of introduction standards into the canal, without mentioning the ability of the canal to dilute potential contaminants, standards that are set too high for testing purposes would completely negate any municipality's ability to introduce water into the canal. The TOQC has concerns that introductory standards would make it near impossible to introduce water, understanding that a minimal amount of water may be introduced and by the time that water reaches the next water treatment plant the water would be diluted to a point that would not cause harm to any water treatment plant along the canal.

The second main concern is testing methods outlined in the document.

1. Analytical methods: The water industry has classified three main categories for contaminants: Drinking Water (Safe Drinking Water Act), Wastewater (Clean water act) and Hazardous Waste/Soil. When a sample is delivered to a lab the lab must be notified which category the water belongs to. Some of the methods listed in Table A-2 are not drinking water methods and therefore cannot be used on drinking water samples.

2. Laboratory Licensing: In section 3.4.1.2 of the WQGM it states, “A test result is valid only if the sample is analyzed by a laboratory that is licensed by the Arizona Department of Health Services (ADHS). ADHS will not license labs for analyses that are not regulated by an agency. In table A-1 and A-2 there are multiple contaminants listed that are not regulated, therefore ADHS will not grant a license to any laboratory. All this being said, if the requirement for laboratory licensure is maintained for this program, the unregulated contaminants will need to be removed from the Tables.
3. Introduction Water Quality Standards – Table A-1 lists many contaminants (referred as ‘Characterize’) that do not have an Introductory or Delivery Standard. Table A-1 header states that a temporary Introduction Standard equal to 3 times the stated MRL or the current MCL, whichever is lower, will be used to regulate these contaminants. For unregulated contaminants present in a drinking water supply, a MCL does not exist. For some of the contaminants listed, 3 times the MRL is significantly lower than the historical concentration measured in the canal. For other contaminants, there is no historical data for the canal water. For unregulated contaminants, systems are not required to treat for these contaminants prior to serving the water into the drinking water system. The TOQC does not believe that water introduced into the canal should be held to a higher standard than water that is treated and used for drinking. The TOQC has significant concerns that these standards will make it highly unlikely, if not impossible for anyone to introduce water into the canal. The setting of Introduction Standards that are extremely stringent and have no real relationship to the quality of CAP water doesn’t take into account mass loadings from the introduced water and the degree of dilution that will occur in the canal, both of which will not affect the overall water composition in the canal, let alone the water that is taken out and served to residents as drinking water.

Once again the TOQC appreciates the opportunity to respond to the Draft Water Quality Guidance for the Introduction of Non-Project water into the Central Arizona Project Canal. Although we know this process has been a heavy lift up to this point, the TOQC would appreciate further discussion possibly in a group or committee format to work through these serious issues.

We believe we could address high level concerns that could be worked through quickly with discussion and education from CAP customers with plans to use non project water to move through the canal to the communities that will require water resources in the future. We do have concerns that inaccuracies and feasibility in the details of the document could hinder the opportunities to be able to put non-project water in the system. We agree, that it is imperative to maintain the integrity of the water in the canal but we also believe further discussion could help us add or subtract elements of this report that could allow the safe introduction of non-project water into the canal and still maintain the integrity of the system for the all CAP customers and stakeholders.

Thank you for your time,

Sincerely,

Paul Gardner