



Bill McElmer  
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AUG 21 2008

JORDAN VALLEY WATER  
CONSERVANCY DISTRICT

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DIVISION OF  
WATER QUALITY

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DWQ-2008-001373  
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August 20, 2008

Walt Baker, Director  
Division of Water Quality  
PO Box 144870  
Salt Lake City, UT 84114-4870

Subject: Proposed Amendments to the Standards of Quality for Waters of the State R317-2

Dear Walt:

Jordan Valley Water Conservancy District appreciates the opportunity to comment on the proposed amendments to Section R317-2 regarding Water Quality Standards. We very much appreciate the opportunity to participate as a member of the stakeholders group working with the Division of Water Quality and providing input as part of the triennial review and revision process, and to participate in the Great Salt Lake selenium studies stakeholder process.

Jordan Valley Water provides drinking water to a significant portion of the State's population and has a vested interest in protecting our various drinking water sources. We actively work with State and other agencies to monitor and protect watersheds, but without jurisdiction in these areas we must rely on local, state, and federal agencies' authority to control potential contamination sources and enforce existing regulations.

It is our recommendation that in an effort to continue to work together and protect our high quality drinking water sources, the following modifications be made to Section R317-2-3.5d "Special Procedures for Drinking Water Sources" of the Water Quality Standards:

d. An Antidegradation Review may be required by the Executive Secretary for discharges to waters with a Class 1C drinking water use assigned, irrespective of whether any of the conditions in Section 3.45 b. apply. Factors to be considered may include the volume of the discharge compared to the flow of the receiving stream, or where the pollutants discharged may have potentially adverse impact on the drinking water supply.

**Prior to issuing a permit for a new or increased discharge to a drinking water source, the Executive Secretary shall require a coordination meeting with the Division of Drinking Water, all affected drinking water utilities, and the permit applicant to evaluate any potential risk to public health and/or any discharge alternatives.** Depending upon the **proposed** location(s) of the discharge and its proximity to downstream drinking water diversions, additional treatment or more stringent effluent limits or additional monitoring, beyond that which may otherwise be required to meet minimum technology standards or in stream water quality standards, may be required by the Executive Secretary in order to adequately protect public health

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and the environment. Such additional treatment may include: additional disinfection; suspended solids removal to ~~make the improve~~ ~~disinfection process more effective~~ effectiveness; removal of any specific contaminants for which drinking water maximum contaminant levels (MCLs), or current identified concerns, exist; and/or nutrient removal to reduce the organic content of raw water used as a source for domestic water systems.

Additional monitoring may include: analyses for viruses; [~~giardia, cryptosporidium~~ ~~Giardia, Cryptosporidium~~ protozoa, other pathogenic organisms, and/or any contaminant for which drinking water MCLs, or identified realistic public health concerns, exist. Depending on the results of such monitoring, more stringent treatment may then be required.

The additional treatment/effluent limits/monitoring which may be required will be determined by the Executive Secretary after consultation with the Division of Drinking Water and the downstream drinking water users.

Relative to the proposed Great Salt Lake selenium standard, the District is very supportive of the proposed 12.5 mg/kg bird egg standard. The District is concerned adopting the Assessment methodology as proposed may raise implementation challenges. Deferring action on the Assessment Methodology until the questions can be answered appears to be the right action to take. However, the District strongly encourages you and your staff to recommend to the Board of Water Quality action be taken on the proposed Selenium standard at the next opportunity.

Many individuals and organization have invested time and money towards a Selenium standard and protection of Great Salt Lake. If action on the proposed Selenium standard were to be deferred until the Assessment Methodology issues are resolved the momentum and strength of the Great Salt Lake Steering Committee could be deflated.

As the Division moves forward towards the establishment of a Great Salt Lake Commission, the development of the Selenium standard will be viewed as an ideal role model of coordinated government and private efforts or with contempt and frustration. The District believes an immediate action of a standard adoption will achieve the best result.

We appreciate your consideration of these comments. If you have any questions or would like further discussion, please contact me at 565-4300 or Shazelle Terry at 446-2000.

Sincerely,



Bart A. Forsyth, P.E.  
Assistant General Manager

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