

A Synthesis of ELPH Meanings

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To date, eleven Drinking Water Subcommittee members have described what “An Equivalent Level of Public Health Protection,” referred to as “ELPH” or “ELPHP,” means to them. These individual write-ups are attached to this document.

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Across the majority, there is a high level of consensus on a number of issues.

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• The “50/3” ROD targets serve as a surrogate indicator of the quality of Delta waters as a drinking water supply, based on the best available science, regulations, and technology at the time the ROD was adopted. The use of a surrogate also encompasses other drinking water quality issues, such as salinity, which is linked to bromide in Delta waters.

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• There is a need to develop a baseline of health risk represented by the “50/3” ROD targets for bromide and total organic carbon, covering both chronic and acute risks, which could then serve as a benchmark for achieving an equivalent level of public health protection in other ways.

• CALFED’s strategy for water quality should contain tools that are flexible and can be adapted to local and regional conditions. CALFED’s strategy should also contemplate incremental steps to improvement where appropriate, utilizing short term measures while long term measures are being implemented.

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• The tools used to improve water quality should result in solutions that afford equity to all stakeholders, are both robust and cost-effective, and provide multiple benefits (to other CALFED program elements). The tools should be evaluated to determine how well they perform against these solution criteria (both alone and in combination).

Inserted: CALFED’s strategy should also contemplate incremental steps to improvement where appropriate, utilizing short term measures while long term measures are being implemented.

• Adaptive management, with supportive and systematic monitoring and assessment, should be utilized. There should be flexibility in the program without compromising the health promised by the “50/3” targets.

Deleted: <#>The strategy could recommend best management practices (BMPs) and best available technologies (BATs) for protecting, managing, treating, and distributing Delta source water used for drinking water.¶

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In general, there were no major areas of disagreement in the DWS’s approach to ELPH. There were several other important comments made by individual members in their write-ups:

• The strategy could identify and recommend best management practices (BMPs) and best available technologies (BATs) for both source control and treatment technologies.

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• There needs to be better definition of the regulatory implications of the “50/3” ROD targets. The Drinking Water Policy developed by the Central Valley Regional Water Quality Control Board should be a component of the ELPH strategy.

- Water quality modeling and economic modeling should be employed to support decision making when implementing ELPH.