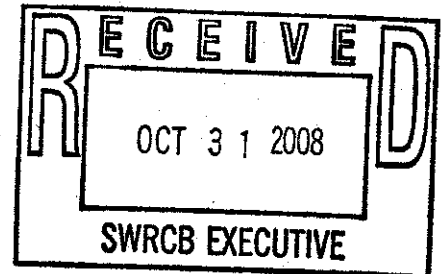


3152 Shad Court
Simi Valley, CA 93063
October 31, 2008

State Water Resources Control Board
Jeanine Townsend, Clerk to the Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Re: "Comment Letter - Bacterial Standards for REC-1 Waters."

Dear Members of the Board:

This letter is a follow-up to and continuation of my October 30, 2008 letter on the aforementioned subject.

JORDAN QUESTIONS (Continued)

3. With regards to Element 7 (Analytical Methods), in Chapter 5 of the USEPA's Report of the Experts Scientific Workshop On Critical Research Needs for the Development of New Or Revised Recreational Water Quality Criteria (June 15, 2007) the "Method for Assessing Risk" section mentions: 1. QMRA, 2. epidemiological studies, and 3. dynamic infectious disease modeling. Are these the types of specific methods that would be discussed under Element 7's Alternative 2? If so, would there be a combination of using both epidemiological study and QMRA since the USEPA report mentioned that "Workgroup members also noted that epidemiological studies can identify illness, but not infections, whereas QMRA studies can predict infections, but have more uncertainties associated with translating infections into an estimation of illness..."
4. Does the Board accept the phrase "acceptable risk" or the "more frequently" "internationally" used phrase "tolerable risk" when regarding public health risks associated with exposure to recreational water--the workgroup members concluded there is a difficulty with the "general acceptance" for "acceptable risk", and as for "tolerable risk",

the phrase "was still not tolerated by all members of the workgroup"?

Members of the Board, enclosed is a "Corrected" copy of Page 1 of my October 30, 2008 letter. The word "Contract" has been corrected to "Contact". Also, INFORMATIONAL DOCUMENT in the beginning sentence has been professionally underscored instead of being hand-written. Then too, under my Element 2's Alternative 4 comment, at the end I have included the date of the USEPA's June 2007 document. I hope these inaccuracies have not caused any inconvenience.

Sincerely,



Mrs. Teresa Jordan

Corrected Copy
MJG/4

3152 Shad Court
Simi Valley, CA 93063
October 30, 2008

State Water Resources Control Board
Jeanine Townsend, Clerk to the Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: "Comment Letter - Bacterial Standards for REC-1
Waters."

Dear Members of the Board:

These are my comments on the INFORMATIONAL DOCUMENT
dated September 2008.

INFORMATIONAL DOCUMENT

Element 1: Bacterial Indicators

Alternative 8 - Combination of Alternatives 2
and 3 (New).

Element 2: Level of Protection for Water Contact
Recreation

Alternative 4 - Adopt risk level more stringent
than U.S. EPA recommendation.
Please note that I based my
decision on the greater risk to
children, pregnant women, the
elderly, and the HIV/AIDS
afflicted population discussed
in Chapter 5 of the *Report of
the Experts Scientific Workshop
On Critical Research Needs for
the Development Of New Or
Revised Recreational Water
Quality Criteria* (June 2007).

Element 3: Calculation of Effluent Limits

Choosing one of the three alternatives was
extremely difficult. Alternative 1 (No action)