

Comparison of Draft General Permit for Landscape Irrigation Uses of Municipal Recycled Water and Current Irrigation Requirements

State Water Resources Control Board
July 7, 2009 Meeting



Legislative Intent

It is the intent of the Legislature to create a uniform interpretation of state standards to ensure the safe, reliable use of recycled water for landscape irrigation uses consistent with state and federal water quality law.

(Assembly Bill 1481)

Draft General Permit

- Goes beyond interpreting standards and creates new requirements.
- Is not fully consistent with water quality law: it goes beyond it.
- The Associations' June 30th comments provide specific language changes that can address these concerns .

The Engineering Report

Draft General Permit

Amendments to the approved Title 22 Engineering Report (e.g., for “new use sites” not included in the approved Title 22 Engineering Report) **shall be approved by CDPH.**

The Administrator shall include copies of approval letter(s) prepared by CDPH regarding such amendments to the Title 22 Engineering Report in the annual report submitted to the State Water Board.

--p.19, Provision 7

Title 22

§60323. Engineering report.

- (a) No person shall produce or supply reclaimed water for direct reuse from a proposed water reclamation plant unless he files an engineering report.
- (b) The report shall be prepared by a properly qualified engineer registered in California and experienced in the field of wastewater treatment, and shall contain a description of the design of the proposed reclamation system. The report shall clearly indicate the means for compliance with these regulations and any other features specified by the regulatory agency.

--Ch. 3. Water Recycling Criteria

Art. 7. Engineering Report and Operational Requirements

No requirement that the Engineering Report or new use sites be approved by CDPH.

Site Retrofits

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All reclamation **equipment, pumps,** piping, valves, and **outlets** shall be appropriately marked to differentiate them from potable facilities. All reclamation distribution system piping shall be purple or adequately identified with purple tape, tags, or stickers per Section 116815(a) of the California Health and Safety Code.

--page 14, Specification 6

Would require replacement of all onsite irrigation piping at retrofit

Health and Safety Code

All pipes installed above or below the ground, on or after June 1993, that are designed to carry recycled water shall be colored purple or distinctly wrapped with purple tape.

--Section 116815(a)

No requirement that irrigation system retrofits requires replacement with purple pipe. No requirement on coloring of equipment, pumps and outlets.

Irrigation Periods

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Use Areas that are spray irrigated and allow public access shall be irrigated during periods of minimal use (e.g., between 9 p.m. and 6 a.m.). Consideration shall be given to allow maximum drying time prior to subsequent public use.

--page 14, Specification 6

Title 22

No restrictions for disinfected tertiary recycled water

Site Inspections

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The Administrator shall ensure that periodic inspections are **conducted at least quarterly** of the Use Areas they supply and establish procedures to monitor and assure compliance with conditions of this General Permit. The Administrator shall also ensure that regular inspections occur to assure cross-connections with potable water systems are not made and air-gap devices are installed and operable.

--p. 22, Provision 9

Water Code

- (b) A master reclamation permit shall include, at least, all of the following:
- (5) A requirement that the permittee conduct **periodic inspections** of the facilities of the reclaimed water users to monitor compliance by the users with the uniform statewide reclamation criteria established pursuant to Section 13521 and the requirements of the master reclamation permit.

§13523.1. Master permit requirements

Monitoring and Reporting

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“Total nitrogen application rate shall consider nutrients contained in the recycled water, based on monthly analytical data provided by the Producer to the Regional Water Board **as well as any other chemical or organic fertilizers used in the operation of the Recycled Water Use Area.**”

“Salinity application rate shall be calculated using the applied volume of recycled, actual application area, the most recent results for the concentration of total dissolved solids in the recycled water, **and the salinity characteristics of any additional sources of salinity.**”

Water Code

- (b) A master reclamation permit shall include, at least, all of the following:
- (4) A requirement that the permittee submit a quarterly report summarizing reclaimed water use, **including the total amount of reclaimed water supplied, the total number of reclaimed water use sites, and the locations of those sites**, including the names of the hydrologic areas underlying the reclaimed water use sites.

§13523.1. Master permit requirements

--Monitoring and Reporting Program

Public Notice & Education

Title 22

Draft General Permit

Signs with proper wording (in English and Spanish) of a size no less than four inches high by eight inches wide shall be placed at all areas of public access and around the perimeter of all areas of recycled water use or conveyance to alert the public of the use of recycled water. **All signs shall display an international symbol similar to that shown in Attachment D and present wording similar to the following:**

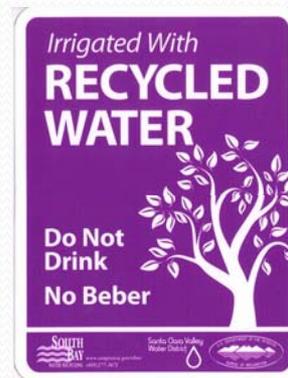
“RECYCLED WATER—DO NOT DRINK”

“AGUA RECICLADA—NO BEBER”



--p.14, Specification 12

All use areas where recycled water is used that are accessible to the public shall be posted with signs that are visible to the public, in a size no less than 4 inches high by 8 inches wide, that include the following wording : "RECYCLED WATER - DO NOT DRINK". Each sign shall display an international symbol similar to that shown in figure 60310-A. **The Department may accept alternative signage and wording, or an educational program,** provided the applicant demonstrates to the Department that the alternative approach will assure an equivalent degree of public notification.



p. 21, Article 4. Use Area Requirements (g)

Reporting Levels

- Recycled Water Policy emphasizes the importance of consistency with all State and federal water quality laws.
- Prior to 1997, recycled water spills were subject to a 1,000 gallon reporting level.
- The Legislature purposefully established a higher reporting level for tertiary treated recycled water (Water Code section 13529.2)
- Compliance with the BMPs is already addressed in Operations Plan requirements of the General Permit.