

# **ATTACHMENT 3**

California American Water  
Comment Letter dated January 20, 2017



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VIA E-MAIL: [Centralcoast@waterboards.ca.gov](mailto:Centralcoast@waterboards.ca.gov)  
Jon Rokke  
Central Coast Regional Water Quality Control Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

Re: Draft Order R3-2017-003; Waste Discharge Requirements - Pure Water Monterey  
Groundwater Replenishment Project

Dear Mr. Rokke:

California American Water appreciates the opportunity to review, and provide comments regarding, the draft Waste Discharge Requirements ("Draft Order") for the Pure Water Monterey Groundwater Replenishment project ("Project"). As a purchaser of water from the Project – as well as a water purveyor that relies heavily on the Seaside Basin as a source of water supply – California American Water wishes to balance the regulatory burdens on the Project that could increase the cost of product water with the protection of the Seaside Basin as an important regional source of drinking water. To that end, we have a few, limited comments.

1. The Final WDRs should clearly specify the required treatment processes.

Condition IV.2 of the Draft Order prohibits "bypass, discharge, or delivery to the use area of inadequately treated recycled water." California American Water notes that the Draft Order does not specify what is "adequate treatment." In Order R8-2004-002, the Division of Drinking Water (then the Department of Health Services) specified in Condition 3 of the DHS findings the treatment processes that must be followed for the Orange County Water District Groundwater Replenishment Project. To ensure no ambiguity in the treatment processes that will protect the Seaside Basin, California American Water suggests that Condition IV.2 of the Draft Order be revised to mimic DHS Condition 3 of Order R8-2004-002.

2. The Final WDRs should require maintaining the industrial pretreatment program.

Industrial pretreatment programs are important to protecting the beneficial uses of treated wastewater, whether discharged to the ocean or used as a potable water supply. The Regional Board should include a condition in the Final WDRs requiring MRWPCA to maintain an appropriate industrial pretreatment program.

3. The Final WDRs should require drinking water methods be used for testing.

Condition II.4. of the Monitoring Program allows MRWPCA to choose between either drinking water laboratory methods or wastewater laboratory methods. Because the Project effluent will be used to augment an important regional drinking water source, California American Water recommends that preference be given to drinking water methods where an appropriate drinking water method exists, rather than giving discretion to choose the test method. This way results from the Project can be compared with results of drinking water tests conducted by water purveyors without concern that the test method may cause variability in the results (i.e., allows an "apples-to-apples" comparison).

4. The Final WDRs should require water purveyors using the Seaside Basin as a drinking water source to be notified of violations in addition to the Regional Board.

Condition V.3. of the Draft Order requires MRWPCA to notify the Regional Board within 24 hours of any violation or adverse conditions that results from using recycled from the Project. California American Water requests that the Final WDRs be modified in two ways. First, the time for notification should be require the MRWPCA to provide notice "as soon as they become aware of the circumstances, but no later than 24 hours." Second, in addition to providing timely notice to the Regional Board, MWRPCA should also notify all water purveyors drawing potable water from the Seaside Basin of the same information provided to the Regional Board immediately following notification to the Regional Board. This will allow water purveyors to take any action they deem appropriate to monitor and protect their potable water supplies.

Thank you for providing an opportunity to review and comment on the Draft Order. We hope you find our comments appropriate and revise the final order accordingly.

Best Regards,



Tim Miller  
Senior Director, Water Quality and Environmental Compliance