
Central Valley Regional Water Quality Control Board

29 March 2016

Casey Wichert, Wastewater Operations Manager
City of Brentwood
150 City Park Way
Brentwood, CA 94513

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NOTICE OF APPLICABILITY

**STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0090-DWQ
GENERAL WASTE DISCHARGE REQUIREMENTS FOR RECYCLED WATER USE
CITY OF BRENTWOOD RECYCLED WATER PROGRAM
CONTRA COSTA COUNTY**

Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff reviewed the City of Brentwood's (City) August 2015 Notice of Intent (NOI), which was received on 7 September 2015. The NOI was submitted to apply for regulatory coverage under Water Quality Order WQ 2014-0090-DWQ, *General Waste Discharge Requirements for Recycled Water Use* (hereafter, General Order). The State Water Resources Control Board adopted the General Order on 3 June 2014 to regulate the use of recycled water for all Title 22 uses except groundwater recharge. The General Order delegates the responsibility of administering water recycling programs to a designated Administrator to the fullest extent possible.

The City owns and operates the Brentwood Wastewater Treatment Plant (WWTP) located at 2251 Elkins Way in Contra Costa County. The WWTP is regulated under Waste Discharge Requirements Order R5-2013-0106-01 (NPDES Permit No. CA0082660) for the discharge of disinfected tertiary treated wastewater to Marsh Creek, which is a perennial stream located within the jurisdictional area of the Sacramento-San Joaquin Delta. The City proposes to expand the City's existing recycled water program and replace current regulation of the program under Master Reclamation Permit Order R5-2004-0132 with regulation under this General Order.

Pursuant to WDR Order R5-2013-0106-01 (NPDES Permit No. CA0082660) Provision VI.A.2.n, the City submitted Wastewater Change Petition WW0085 to the State Water Resources Control Board, Division of Water Rights (DWR) on 29 April 2015 to reduce the quantity of treated wastewater discharged to Marsh Creek for use in the proposed recycled water program expansion. The State Water Resources Control Board approved the change petition on 12 October 2015.

The City submitted a Title 22 Engineering Report (Appendix C of the August 2015 NOI) to the State Water Resources Control Board, Division of Drinking Water (DDW) for review of the proposed recycled water use program. On 16 November 2015, DDW provided comments on

the Title 22 Engineering Report. DDW stated that the recycled water use program was well designed, robust, and meets Title 22 Water Recycling Criteria. DDW also stated that only plans and specifications for new dual plumbed use areas need to be submitted to DDW rather than each newly proposed recycled water use area.

Based on the information provided in the NOI and Revised Title 22 Engineering Report, the proposed water recycling program satisfies the general and specific conditions of the General Order. Therefore, this Notice of Applicability (NOA) serves as formal notice that WQO 2014-0090-DWQ is applicable to the recycled water program described below. The City of Brentwood will act as the Administrator of the recycled water program and provide tertiary treated water for agricultural, industrial, residential, and commercial use activities as permitted by the City and identified within Title 22. The recycled water program is hereby assigned WQ-2014-0090-R5007. Please include this number on all correspondence related to this recycled water program. Master Reclamation Permit Order R5-2004-0132 will be rescinded at a future Board hearing.

WASTEWATER TREATMENT FACILITY

The City's WWTP consists of a headworks (screening and grit removal), two extended aeration activated sludge basins, two denitrification basins, two secondary clarifiers, two banks of two single media filters (total of four filters), a chlorine contact chamber, dechlorination, and a cascade aeration system. Disinfected tertiary treated wastewater is either discharged to Marsh Creek or distributed as part of the recycled water program through a nonpotable water distribution system, which consists of a network of pipelines and pump stations constructed in accordance with applicable Title 17 and Title 22 specifications. The nonpotable water distribution carries both disinfected tertiary treated wastewater and raw Delta water supplied by East Contra Costa Irrigation District (ECCID).

RECYCLED WATER PROGRAM

The City has established a recycled water program that requires customers to obtain a use permit. Under this program, customers are held to requirements that ensure the recycled water program functions appropriately and in accordance with objectives set forth in the General Order. The City, as the Administrator, is responsible for the administration of the recycled water program as authorized pursuant to the General Order. The City is also the recycled water producer and distributor and is responsible for all permit requirements related to the production and distribution of recycled water.

The City may provide recycled water to property owners and businesses in the geographic areas surrounding and within the City of Brentwood. Recycled water use may include industrial users for process water needs; agricultural users for irrigation needs; commercial users for construction water (soil compaction, dust control and cement mixing); and commercial and residential users for landscape irrigation, gardening and water feature needs. Recycled water may also be provided to industrial and agricultural users through direct connection to the recycled water distribution system as permitted by the City.

Potential recycled water users are required to obtain a Recycled Water Use Permit from the City. As appropriate, obtaining a use permit requires completing a Use Permit Application, submitting plans for review and approval, and receiving training. Industrial and agricultural users directly connected to the City's distribution and discharge system shall comply with the

requirements of the City's Recycled Water Rules and Regulations, inclusive of Title 22 requirements. Training covers the approved Title 22 uses; use requirements; prohibited uses and any additional training specific to the distribution and use of recycled water.

The City's existing program that allows residential/commercial customers to pick up and haul disinfected tertiary recycled water from City operated fill stations for hand irrigation (i.e., recycled water may not be introduced into a plumbing system) of trees, shrubs, gardens, and vegetable gardens is currently enrolled under Order R5-2013-0145-0047, the *Waiver of Reports of Waste Discharge and Waste Discharge Requirements for Specific Types of Discharge within the Central Valley Region (Waiver)*, which expires on 6 December 2018.

Effective **6 December 2018**, the City may continue the recycle water fill station program under regulation of this NOA. The residential/commercial fill station program requires customers to obtain a use permit and receiving training from the City. Training covers the approved use of recycled water and emphasizes that recycled water is not to be used for drinking, cooking, or filling pools, and cannot be plumbed or pumped into any domestic water supply. The training also discusses requirements such as preventing runoff from the use area and prohibited uses that include equipment and street wash-down. Customers are given recycled water notice stickers to be placed on all containers used for transporting and/or storing recycled water. Customers are required to complete a log sheet every time they collect recycled water.

WATER RECYCLING USE REQUIREMENTS

1. The production, distribution, and use of recycled water shall be managed in accordance with the NOI, DDW approved Title 22 Engineering Report, and this NOA.
2. Application of recycled water shall be limited to the uses described in the NOI, DDW approved Title 22 Engineering Report, and this NOA.
3. The use of recycled water shall not cause pollution or nuisance, as defined by Water Code section 13050.
4. The recycled water shall be tertiary disinfected recycled water as defined by Title 22, section 60301.230.
5. Recycled water use area setbacks shall be consistent with Title 22 requirements.
6. The City shall promptly notify the Central Valley Water Board of any recycled water spills or unauthorized uses.
7. The City shall submit plans and specifications for new dual plumbed use areas to DDW for review.

MONITORING AND REPORTING REQUIREMENTS

Recycled water production, disinfection, storage, and use shall be monitored in accordance with the General Order's Monitoring and Reporting Program (MRP). When monitoring requirements listed in the General Order's MRP duplicate existing requirements under other WDRs or waivers, duplication of sampling and monitoring is not required if the monitoring activity satisfies the requirements of the General Order. The results of such monitoring shall also be included as part of this General Order's MRP. Disinfection system monitoring with a sampling frequency

listed as “to be determined” shall occur at the same frequency specified for EFF-001 in MRP R5-2013-0106-01 or any revision thereto. The General Order’s MRP annual report is due by **1 February** following the monitoring year.

GENERAL INFORMATION AND REQUIREMENTS

The City shall comply with the Specifications, Water Recycling Administration Requirements, and General Provisions of the General Order.

Please review this NOA carefully to ensure that it completely and accurately reflects the proposed Recycled Water Program. Failure to comply with the requirements of the Waiver may result in enforcement action as authorized by provisions of the California Water Code, which could include civil liability.

The required annual fee specified in the annual billing from the State Water Board shall be paid until this NOA is officially terminated. The City must submit in writing a Notice of Termination once the water recycling program has ended.

DOCUMENT SUBMITTALS

All monitoring reports and other correspondence should be converted to searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50 MB should be emailed to:

centralvalleysacramento@waterboards.ca.gov.

To ensure that your submittal is routed to the appropriate staff person, the following information should be included in the body of the email or any documentation submitted to the mailing address for this office:

Facility Name: City of Brentwood, Contra Costa County		
Program: Non-15 Compliance	Order: WQ 2014-0090-R5007	CIWQS Place ID: 210322

Documents that are 50 MB or larger should be transferred to a CD, DVD, or flash drive and mailed to:

Central Valley Regional Water Quality Control Board
ECM Mailroom
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Now that the NOA has been issued, the Water Board's Compliance and Enforcement Section will take over management of your case. Guy Childs is your new point of contact for any questions about the Order. In addition, all monitoring and technical reports should be submitted to him. If you find it necessary to make a change to your permitted operations or the application of recycled water as described in this NOA changes, Guy will direct you to the appropriate permitting staff. You may contact Guy at (916) 464-4648 or at gchilds@waterboards.ca.gov.

 For
PAMELA C. CREEDON
Executive Officer

Encl: State Water Resources Control Board Order WQ 2014-0090-DWQ – Corrected,
General Waste Discharge Requirements for Recycled Water Use

cc w/o: Timothy O'Brien, State Water Resources Control Board, Sacramento
Bhupinder S. Sahota, Division of Drinking Water, Stockton
John Wiggins, Contra Costa County Environmental Resources Department, Concord
Art O'Brien, Robertson-Bryan, Inc., Elk Grove