



March 22, 2016

Mr. Sam Unger
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Attention Veronica Cuevas, Water Resource Control Engineer
Los Angeles Regional Water Quality Control Board

Comment Letter: Tentative Waste Discharge Requirements and Water Reclamation Requirements – City of Burbank, Burbank Water Reclamation Plant (File No. 83-25, CI-6753)

Dear Veronica,

The City of Burbank (City) appreciates the opportunity to provide comments on the Tentative Waste Discharge Requirements (WDRs) and Title 22 Water Recycling Requirements (WRRs) for the City of Burbank, Burbank Water Reclamation Plant (File No. 83-25, CI-6753). We offer the following comments and recommendations for your consideration and inclusion in the Board's agenda folder for the April 14, 2016, public hearing.

Our comments are separated into three categories: 1) Major Comments and 2) Other Comments, and 3) Editorial or Typographical Comments. We sincerely hope we can resolve the Major Comments before this Tentative Order is finalized, resulting in a permit that supports the City's long and successful history of water recycling.

Major Comments:

1. Page 20, Item IX, Section 10, first line: We request that the word "below" be replaced with the word "above" as follows (deletions are shown as strikethrough, insertions are in **bold**):
"Recycled water shall not be applied to uses other than those enumerated ~~below~~ **above**..."
This change would incorporate all the allowable uses for recycled water that are cited in Item IX, sections 4, 5, 6, and 7 on pages 17 through 20.
2. Page 20, Item IX, Section 12: The list in this section should either be deleted (that is, if the changes requested in Comment 1, above, are made), or should be expanded to include *all* of

the allowed uses of recycled water included in Item IX, sections 4, 5, 6, and 7 on pages 17 through 20. To expand this list, the following allowable uses should be added to Item IX, Section 12:

- a. **Surface Irrigation** (to include all categories listed in Item IX, Section 4)
 - b. **Other Purposes** (to include all the categories listed in Item IX, Section 7, specifically: flushing toilets and urinals; priming drain traps; industrial process water that may come into contact with workers; structural fire fighting; decorative fountains; commercial laundries; consolidation of backfill around potable water pipelines; artificial snow making for commercial outdoor use; industrial boiler feed; nonstructural fire fighting; backfill consolidation around nonpotable piping; soil compaction; mixing concrete; and cleaning roads, sidewalks and outdoor work areas.
3. Page 28, Item XII, Section 26: The first sentence (“There shall be no public contact with recycled water.”) should be deleted because Title 22 allows recycled water to be used as a source of water supply for nonrestricted recreational impoundments.
 4. Pages MRP-4 and MRP-5, Table M1: The last line on page MRP-4 indicates that the “Type of Sample” for “Remaining Attachment A Pollutants” must all be “grab” samples. The first line on page MRP-5 indicates that “Remaining Priority Pollutants” must all be 24-hour composites. To avoid duplicative work, and more importantly, to get better sample results for certain constituents, we request that the Type of Samples required by this WDR/WRR permit be the same as the Type of Samples that are already being collected under the plant’s Order No. R4-2012-00059, NPDES No. CA00555, Waste Discharge Requirements for the City of Burbank, Burbank Water Reclamation Plant. We have attached a table with our recommendations for each of the constituents for which we are requesting consistent Type of Samples.

Other Comments:

5. Page 7, Item IV.1, last sentence: We suggest deleting the words “water quality” in the final sentence as follows: “In October 2010, the City of Burbank prepared an updated Master Plan to include additional ~~water quality~~ projects that have been identified as economically viable.”
6. Page 14, Item VII, Table 6: The City respectfully requests that the Total Dissolved Solids and Chloride concentration limits match those in Order No. R4-2012-00059, NPDES No. CA00555, Waste Discharge Requirements for the City of Burbank, Burbank Water Reclamation Plant. The limits for these constituents in Order No. R4-2012-00059, which we are requesting for this Order’s WDR and WRRs are as follows:

Constituents	Units	Requested 30-Day Average
Total Dissolved Solids	mg/l	950
Chloride	mg/l	190

7. All of the following sections refer to the identification of recycled water pipelines, valves, and other components, but are all slightly different:

- a. Page 20, Item IX, Section 11(recommend deleting)
- b. Page 24, Item XI, Section 3.B (recommend deleting)
- c. Page 26, Item XII, Section 16 (recommend revising)

To eliminate redundancies and inconsistencies, we recommend deleting Item IX, Section 11 and Item XI, Section 3.B and revising Item XII, Section 16 as follows: “The ~~California-Nevada Section~~ American Water Works Association’s ~~G~~guidelines **regarding identification of recycled water system components for the Distribution of Non-Potable Water (1992)** needs to be followed. ~~including purple pipe, adequate signs, etc.~~ Adequate separation of at least 4-foot horizontal and 1-foot vertical ~~separation shall~~ **should** be provided between recycled water lines and domestic potable water lines. **Less separation may be approved by DDW or its delegated agency on a case-by-case basis.”**

DDW and its delegated agencies often approve alternatives to the distance requirements when site conditions deem this appropriate.

- 8. Page 24, Item XI, Section 1.F: This sentence should either be deleted, or made consistent with Item XIII, Section 11 on Page 29, which has the correct reference to the type of certification required by Title 23.
- 9. Page 25, Item XII, Section 9: We request the following changes to this paragraph: “For each new recycled water use area, the City of Burbank needs to provide **DDW, or its delegated agency,** with a description ~~for~~ of the use area including, but not limited to: a description of the recycled water use (e.g. landscape, specific food crop, cooling tower, etc.); method of use (e.g. spray, food, or drip); the location of domestic water supply facilities adjacent to the use areas; site containment measures; the party responsible for the distribution and use of the recycled water at the site; identification of other governmental entities which may have regulatory jurisdiction over the reuse site(s) such as State Food and Drug, State Licensing and certification, County Health Department, etc. These agencies shall be provided with a copy of the 2014 Title 22 Engineering Report for review and comment. The City of Burbank ~~needs to notify and shall~~ provide the above information for each new use site that is connected to the recycled water system to the Regional Water Board; ~~the County Environmental Health Department,~~ and DDW **in its quarterly report.”**

The LA County Department of Public Health (LACDPH) requires filing of a recycled water use application for each site that will be connected to Burbank’s recycled water system. LACDPH is delegated by DDW to oversee and approve the connection process and are very informed regarding new use areas. Burbank may add one to three new use areas per month. Quarterly reporting of this information is more appropriate.

- 10. Page 31, Item XIV, Section 7: We request that the required modification can be made by either telephone or electronic means.

Editorial or Typographical Changes:

11. Page 13, Item VI, 1: In the next-to-the last sentence, "PSI" should be changed to "PS-1" and the words "expansion of the" should be deleted as follows: "The ~~expansion of the~~ **PSI PS-1** expansion was completed in November 2010."
12. Page 15, Item VII, 9.A, third line from bottom: "Burbank DPW" should be replaced with "City of Burbank" as follows: "...then ~~Burbank DPW~~ **the City of Burbank** will perform accelerated effluent monitoring for these target chemicals for two or more consecutive months until the MCL is met, at which point the City of Burbank may resume the regular frequency of testing."
13. Page 17, Item IX.4: This paragraph should be numbered "5" instead of "4," and all subsequent numbering in Section IX should be similarly renumbered.

Respectfully,



Daniel J. Rynn
Chief Assistant Public Works Director – City Engineer

Attachment: Comment No. 4 Regarding Table M-1: Consistent Type of Sample Request

**Comment No. 4 Regarding Table M-1: Consistent Type of Sample Request
BURBANK WATER RECLAMATION PLANT**

	Order No. R4-2012-0059	Tentative Draft R4-2016-XXXX	Requested Sample Type	
Test Parameters	Current Sample Type	Draft Sample Type		Rationale
ORGANICS (VOLATILES, EPA 624)				Compositing samples for volatile organic compounds (VOCs) and disinfection byproducts is inconsistent with proper sample handling protocols and may produce unrepresentative data.
1,3-Dichlorobenzene	Grab	24-hour comp.	Grab	
2-Chloroethyl Vinyl Ether	Grab	24-hour comp.	Grab	
Acrolein	Grab	24-hour comp.	Grab	
Acrylonitrile	Grab	24-hour comp.	Grab	
Benzene	Grab	24-hour comp.	Grab	
Bromomethane	Grab	24-hour comp.	Grab	
Chlorobenzene	Grab	24-hour comp.	Grab	
Chloroethane	Grab	24-hour comp.	Grab	
Chloromethane	Grab	24-hour comp.	Grab	
Methylene chloride	Grab	24-hour comp.	Grab	
Total-1,3-Dichloropropene	Grab	24-hour comp.	Grab	
REMAINING ATTACHMENT A POLLUTANTS	-	Grab	24-hr comp.; grab for VOCs and Disinfection Byproducts	
REMAINING EPA PRIORITY POLLUTANTS	24-hour comp.; grab for VOCs	Grab	24-hr comp.; grab for VOCs and Disinfection Byproducts	