

## commentletters

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**From:** Hunley, Christopher <HunleyC@Saccounty.net>  
**Sent:** Tuesday, October 25, 2016 11:59 AM  
**To:** commentletters  
**Cc:** Van Buren, James  
**Subject:** COMMENTS REGARDING THE DRAFT REPORT TO THE LEGISLATURE ON THE FEASIBILITY OF DEVELOPING UNIFORM WATER RECYCLING CRITERIA FOR DIRECT POTABLE REUSE

**Follow Up Flag:** Follow up  
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Dear Ms. Jeanine Townsend:

The Sacramento County Environmental Management Department (EMD) appreciates the opportunity to submit these comments in response to the State Water Resources Control Board's (SWRCB) draft Report to the Legislature on the Feasibility of Developing Uniform Water Recycling Criteria for Direct Potable Reuse (Draft Report). EMD is the Sacramento County Health Officer's designee for environmental related programs and protects public health and the environment by ensuring compliance with environmental regulations. These comments are being offered to the SWRCB to repeat that any future development of Direct Potable Reuse of Recycled Water (DPR) must protect public health and the environment.

The ability to have recycled water discharge into a drinking water source and then be extracted some point away from that source, as with Indirect Potable Recharge (IPR), allows the system to appropriately respond to public health concerns when there is an issue with the recycled water discharge. DPR projects will allow recycled water to be directly introduced into a public water supply or into a raw water supply immediately upstream of a water treatment facility. Removal of an environmental buffer reduces the safety margin. Other issues remain including pathogenic outbreak containment, cases of antibiotic resistant bacteria and constituents of emerging concern, process upsets due to mechanical failure, and source control issues resulting in chemical breakthrough.

The Draft Report relies on development of engineered barriers, such as advanced treatment and monitoring strategies, to provide an equivalent level of public health protection. The term "Robust, Resilient, and Redundant" has been shared as a concept during the DPR public meetings that will guide treatment technology development. For example, the Draft Report discusses installation of treatment systems in parallel; the premise being that if one system fails the second system would still provide treatment. However, if the parallel systems are not monitored effectively or if the technology to monitor does not exist or is not reliable, the system may miss cases when both treatment systems have failed. Unfortunately, no engineered barrier specifics have been developed to evaluate.

Thank you again for the opportunity to provide comments on the Draft Report. Please feel free to contact EMD at [VanBurenJ@sacocounty.net](mailto:VanBurenJ@sacocounty.net) or [HunleyC@saccounty.net](mailto:HunleyC@saccounty.net) should you have any questions.

Sincerely,

--Chris

Christopher Hunley, REHS  
County of Sacramento

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