

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

BOARD OF PUBLIC WORKS MEMBERS

—
KEVIN JAMES
PRESIDENT

HEATHER MARIE REPENNING
VICE PRESIDENT

MICHAEL R. DAVIS
PRESIDENT PRO TEMPORE

JOEL F. JACINTO
COMMISSIONER

LUZ M. RIVAS
COMMISSIONER

BUREAU OF SANITATION

—
ENRIQUE C. ZALDIVAR
DIRECTOR

TRACI J. MINAMIDE
CHIEF OPERATING OFFICER

LISA B. MOWERY
CHIEF FINANCIAL OFFICER

ADEL H. HAGEKHALIL
ALEXANDER E. HELOU
LEO N. MARTINEZ
ROBERT B. IRVIN (ACTING)
ASSISTANT DIRECTORS

—
1149 SOUTH BROADWAY, 9TH FLOOR
LOS ANGELES, CA 90015
TEL: (213) 485-2210
FAX: (213) 485-2979
WWW.LACITYSAN.ORG

October 21, 2016

Public Comments
Report to the Legislature on DPR
Deadline: 10/25/16 12:00 noon

ELECTRONIC MAIL

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Dear Ms. Townsend:



COMMENT LETTER-REPORT TO THE LEGISLATURE ON DIRECT POTABLE REUSE

The City of Los Angeles (City) Bureau of Sanitation (LASAN) appreciates the opportunity to provide comments on the State Water Resources Control Board's (State Board's) Draft Report to the Legislature on the Feasibility of Developing Uniform Water Recycling Criteria for Direct Potable Reuse (Report). LASAN is pleased to support the Report from the Expert Panel and Advisory Panel convened by the State Board and its findings that it is feasible to develop Direct Potable Reuse (DPR) regulations. LASAN is encouraged by the State Board's recognition that recycled water is a valuable resource and a key component of California's future water supply.

As a producer of recycled water, LASAN welcomes the prospect of expanding the use of its recycled water portfolio with DPR providing the City with a new local source of water supply. LASAN already provides approximately 50 MGD of recycled water to offset demand for potable water that is imported to the Los Angeles area through landscape irrigation and industrial process purposes as well as supplementing the Los Angeles River to support the local habitat and other beneficial uses. LASAN also supplies advanced treated recycled water for groundwater barrier protection from seawater intrusion. The DPR has the potential to be a significant part of the City's recycled water program.

In general, LASAN agrees with the Report and offers the following comments for your consideration:

1. Provide a timeline for additional studies and research

LASAN understands that additional studies and research to fill knowledge gaps recommended by the Report would require a lot of resources and may take longer to complete than anticipated. LASAN

zero waste • one water

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

Recyclable and made from recycled waste



recommends that the State Board complete the research and the regulatory development within a reasonable timeframe. LASAN recommends that the State Board develop a timeline with a matrix that details expected completion dates of each major milestones.

2. Allow case by case approval of DPR projects as regulations are developed

LASAN acknowledges the importance of additional research initiatives identified by the Expert Panel related to public health. LASAN recognizes that the State Board and Department of Drinking Water (DDW) have authority to permit DPR projects and would provide oversight and directions to the projects. LASAN agrees that the research and development of DPR regulations be undertaken concurrently. However, LASAN further recommends that DPR projects be permitted while developing the regulations, on a case-by-case basis. LASAN believes that actual DPR projects will provide invaluable information to the regulatory development process.

3. Operator Certification Program

LASAN agrees that DPR systems are complex and should be operated and maintained by certified and well-trained, highly skilled operations staff. Operator certification could take different forms. Nonetheless, LASAN agrees that DPR system operators require high level certification in both water and wastewater operations.

4. Enhanced Source Control and Pretreatment programs

LASAN administers the pretreatment program and supports the integration of additional advanced source control measures to meet its recycled water quality objectives. LASAN understands the importance of advancing source control measures by regulating the industrial sector and informing the public through Public Outreach Programs to reduce or eliminate constituents of concern (COC) generated from the use of cleaning agents, health care, and pharmaceutical products that may enter the wastewater collection system. LASAN believes that a pretreatment standards and Best Management Practices (BMP) approach be considered during the developmental phase of the DPR Regulations and Criteria. However, such pretreatment standards and BMP should not be established for the entire industrial community but rather only for certain industrial sectors that are known to be contributing COCs. The pretreatment and BMP standards considered should be flexible enough so that if a business establishment can demonstrate that the COC is neither present nor expected then that business should not be subject to any additional regulatory burden. Any established monitoring and reporting frequency requirement should not exceed the minimum 40 CFR 403 General Pretreatment Regulation requirement unless necessary as determined by the local authority.

5. Public Outreach Programs

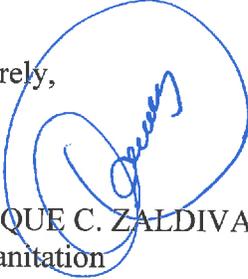
LASAN agrees with the Expert Panel Report, that a comprehensive outreach program will be critical to garnering public acceptance and support of DPR projects, and will be a key element of enhanced source control to minimize constituents of concern from entering the wastewater collection system. Outreach efforts should encompass the general public, commercial and industrial dischargers, rate payers, and school programs.

6. Monitoring of raw wastewater

LASAN agrees that better characterization of pathogens in the raw wastewater coming into the potable water reuse system would be useful to provide more complete information on pathogen concentrations and their variability. However, LASAN believes that the requirement for monitoring pathogens in the raw wastewater as part of a permit condition is not warranted. The Expert Panel recommendation to conduct characterization studies should be voluntary and monitoring not mandatory to the wastewater agencies.

LASAN would like to thank the State Board for its great work in developing the Report and for providing the opportunity to submit comments for your consideration. LASAN looks forward to working with the State Board in developing draft regulations for DPR that is reasonable, scientifically sound, and cost effective while protective of the environment. Should you have any questions regarding this letter, please contact Mr. Hassan Rad, Division Manager of Regulatory Affairs, at (213) 847-5186.

Sincerely,



ENRIQUE C. ZALDIVAR, Director
LA Sanitation

HR:es

c: Traci Minamide, LASAN
Adel Hagekhalil, LASAN
Robert Irvin, LASAN
Tim Dafeta, LASAN
Mark Starr, LASAN
Mas Dojiri, LASAN
Michael Simpson, LASAN
Shahram Kharaghani, LASAN
Ali Poosti, LASAN
Roshan Aflaki, LASAN
Hassan Rad, LASAN
Nancy Sutley, LADWP