



# CVCWA

## Central Valley Clean Water Association

*Representing Over Fifty Wastewater Agencies*

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**TERRIE MITCHELL** – Vice Chair, Sacramento Regional CSD  
**MARGARET ORR** – Treasurer, City of Stockton

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December 19, 2014

**Via Electronic Mail Only**

Mr. Alexander Mushegan  
Water Resources Control Engineer  
Regional Water Quality Control Board,  
Central Valley Region  
1685 “E” Street, Suite 100  
Fresno, CA 93706-2007  
[Alexander.Mushegan@waterboards.ca.gov](mailto:Alexander.Mushegan@waterboards.ca.gov)

RE: Comments on the Tentative Waste Discharge Requirements for Bear Valley Community Services District and Bear Valley Springs Association Wastewater Treatment Facility, Kern County

Dear Mr. Mushegan:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the tentative Waste Discharge Requirements for the Bear Valley Community Services District (District) and Bear Valley Springs Association Wastewater Treatment Facility (Tentative Order). CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law. In this letter, we provide the following comments regarding the recycled water use specifications and request revision as indicated herein.

## I. Recycled Water Use Specifications

The Tentative Order includes recycled water specifications. A number of the specifications track the water recycling criteria in Title 22 or the general orders issued by the State Water Resources Control Board (State Board) for recycled water use or for landscape irrigation uses of municipal recycled water. However, some other specifications are not based on the criteria in Title 22, are more stringent than those criteria, or do not provide the necessary caveat that the District may proceed in a manner different that what is required in Title 22 with approval from the Division of Drinking Water (DDW) at the State Board.

Most importantly, the District has previously prepared and submitted a Title 22 Engineering Report to DDW. The Tentative Order requires that the production, distribution, and use of recycled water must conform to a Title 22 Engineering Report.<sup>1</sup> Some of these specifications in the Tentative Order may be inconsistent with the design specifications the District pursued in its Title 22 Engineering Report. The Central Valley Regional Water Quality Control Board (Regional Board) should refer back to the requirements in the District's Title 22 Engineering Report as the enforceable specifications in the Tentative Order, rather than pick and choose various criteria from different documents to include in the Tentative Order.

With respect to specific recycled water use specifications, CVCWA respectfully requests the following revisions.

- Tentative Order Provision F.7 (page 7) requires the use area to be “inspected as frequently as necessary to ensure continuous compliance with this Order.” Reference to the term “continuous compliance” sets a high bar for inspection of the use area. Rather than adopting this provision as proposed, we recommend that the Tentative Order be revised to include a provision that is similar to that contained in the General Waste Discharge Requirements for Recycled Water Use Order No. 2014-0090-DWQ, which states as follows: “The Administrator or its agent shall conduct periodic inspections of the User’s facilities and operations to determine compliance with conditions of the Administrator requirements and this General Order.” For the purposes of this Tentative Order, we recommend the following language: “Use area shall be subject to periodic inspections to determine compliance with the requirements of this Order.”
- Tentative Order Provision F.8 (page 7) limits the times that recycled water can be applied to the use area to between 9:00 p.m. and 6:00 a.m. Rather than including specific times in the Tentative Order, CVCWA recommends that this provision be revised to be similar to that contained in the State Board’s General Order for Recycled Water Use, which states as follows: “Use Areas that are spray irrigated and allow public access shall be irrigated during periods of minimal use. Consideration shall be given to allow maximum

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<sup>1</sup> Tentative Order, p. 7 (Provision F.2).

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drying time prior to subsequent public use.” The language with respect to hand watering is appropriate and should remain.

- Tentative Order Provision F. 18 (page 8) requires a certain amount of horizontal and vertical separation between pipelines transporting recycled water and pipelines transporting domestic supply water, with no qualifications. This requirement is not part of Title 22 and should be deleted. At the very least, the provision should be revised to be consistent with the State Board’s Landscape Irrigation General Order WQO-2009-0006-DWQ, which states as follows: “Domestic water pipelines shall be configured above recycled water pipelines, unless approved by [DDW].”

We appreciate your consideration of these comments. If you have any questions or if CVCWA can be of further assistance, please contact me at (530) 268-1338 or [eofficer@cvcwa.org](mailto:eofficer@cvcwa.org).

Sincerely,



Debbie Webster,  
Executive Officer