

September 10, 2012

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento CA 95814

**SUBJECT:** State Water Resources Control Board Water Quality Order 2012-XXXX,  
General Waste Discharge Requirements for Aquifer Storage and Recovery  
Projects that Inject Drinking Water into Groundwater

Dear Ms. Townsend:

The Woodland-Davis Clean Water Agency (Agency) appreciates the opportunity to review and provide comments on the subject document. The Agency is a Joint Powers Authority, including the Cities of Davis and Woodland and the University of California at Davis. The Agency is constructing the Davis Woodland Water Supply Project (DWWSP) to divert, treat, and convey Sacramento River water to the Cities' respective service areas. The DWWSP will allow the project partners to reduce their groundwater pumping, a shift that will facilitate compliance with existing and anticipated wastewater discharge requirements and ensure compliance with existing and anticipated drinking water standards.

Aquifer storage and recovery (ASR) could improve the DWWSP's operational flexibility and reliability in meeting demands during normal, dry, and critical years without placing any substantial additional demands on the overall surface water and groundwater supply of the region. Also, ASR could potentially be used to meet peak demands that might otherwise have to be met with groundwater or above-ground storage. If ASR could be used for this latter purpose, water quality under these peak demand conditions would be better than if native groundwater were used. ASR could also have long-term water quality benefits because, over time, injected water would replace native groundwater, which is impaired by nitrate and naturally-occurring metallic species (including arsenic, hexavalent chromium, manganese, and selenium), with better-quality water. This could bring about water quality improvements in municipal wells in the vicinity of the ASR wells.

Our comments are provided below:

1. We commend the efforts of the State Water Resources Control Board (State Water Board) for preparing this regulatory framework for ASR projects. In our opinion, by preparing this document in its current form, the State Water Board has successfully accomplished the following:
  - Acknowledged the important role that ASR and conjunctive use in general play in improving local and statewide water supply reliability, mitigating for droughts, reducing stress on California's groundwater basins in overdraft, and protecting against saline water intrusion and other sources of undesirable water quality.

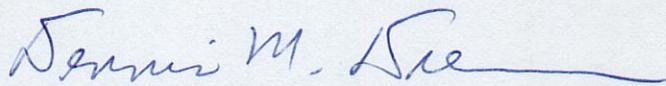
- Provided a clear and consistent regulatory vehicle for ASR throughout the state for use by the regional boards.
- Achieved a streamlined review and permitting process for ASR.
- Provided a clear description of the minimum Best Practicable Treatment or Control (BPTC) as well as other, more costly, BPTC available if water quality objectives cannot be met with the minimum BPTC. We especially appreciate the acknowledgement in Finding 42 that:

*“degradation of groundwater by some of the constituents of concern associated with an ASR project is consistent with the maximum benefit to the people of the state if the Permittee employs the minimum treatment and control technologies.....Economic prosperity of communities and associated industries is of maximum benefit to the people of the state and is a sufficient reason to allow some groundwater degradation, which may arise in some cases, provided that terms of the applicable Basin Plan, and other applicable State and Regional Water Board policies are consistently met”.*

2. The Order refers to many forms of required documentation by ASR Permittees. References to required documentation are found throughout the Order and the level of detail is quite varied. It would be helpful if the State Water Board could include a summary table of the required documentation, objective of documentation, and schedule for completing. An example is provided below based on the documents and schedule information distributed through various sections of the draft Order.
3. It would be helpful if the general order described how the documentation requirements could be met in the case of a multi-well ASR Program in which new wells or groups of wells are to be phased in over time. For example, would a technical report be required for each well in a multi-well program, or could a single document be provided which evaluates all existing and future wells?
4. Finding 39 refers to the implementation of an Operations and Maintenance Plan. Is this document to be delivered to the State Water Board for review or is this intended to be a document available to utility staff for internal use?
5. It would be helpful to include descriptions of the plans listed in the table below in the list of definitions provided as Attachment A.

Again, the Agency appreciates your consideration of our comments. Please contact me at (530) 747-8299 or [ddiemer@cityofdavis.org](mailto:ddiemer@cityofdavis.org), should you have any questions during your review of our comments.

Sincerely,



Dennis Diemer  
WDCWA General Manager

Summary of Required Documentation by Permittee or RWQCB		
Document	Purpose	Schedule for Completion
Notice of Intent – including application fee, Form 200, Technical Report, proof of registration with EPA's UICP	Initiates the permitting process with RWQCB, or notifies the state of material changes in the project	<ul style="list-style-type: none"> <li>Beginning of Project</li> <li>Proof of Registration with EPA's UICP required within 30 days</li> </ul>
Notice of Applicability	<u>Issued by Executive Officer</u> for either the Pilot Test or the ASR Project	
Sampling and Analysis Plan	Description of sampling methods, preservation, containers, recordkeeping, etc... in compliance with MRP	Within 90 Days of Receipt of NOA
Copy of Class V Injection Permit	To prove that well is registered with USEPA	Copy to State Water Board within 30 days of completing the injection well
Non-Compliance Response Plan	Describes reason for non-compliance and corrective measures underway	Within 90 days of discovering non-compliance
Quarterly Monitoring Reports	Required in first year of project to verify compliance with water quality objectives during ASR operation	1 <sup>st</sup> day of the 2 <sup>nd</sup> month after the quarter
Annual Monitoring Report	To verify compliance with water quality objectives	February 1 <sup>st</sup> each year