



San Diego County Water Authority

4677 Overland Avenue • San Diego, California 92123-1233
(858) 522-6600 FAX (858) 522-6568 www.sdcwa.org



May 27, 2014

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

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OTHER
REPRESENTATIVE

County of San Diego

Subject: Comments on Draft General Waste Discharge Requirements for Recycled Water Use

Dear Ms. Marcus:

The San Diego County Water Authority (Water Authority) is a wholesale water agency serving over 3.1 million people in San Diego County. The Water Authority's member agencies deliver over 28,000 AF a year of non-potable recycled water for beneficial use under permits issued by the San Diego Regional Water Quality Control Board. We appreciate the State Water Resources Control Board and staff interest in developing a statewide general permit for non-potable recycling that will streamline permitting of recycled water use and encourage further development of recycled water supplies during this critical drought period. Non-potable water recycling will continue to be an important, and ever expanding water supply options available to California water agencies. We support a permit that expands and encourages recycled water use, while still protecting public health and the environment. The Water Authority supports the comments provided by the WaterReuse Association and would like to highlight some key areas of concern for our region.

Permit Timing

Recycled water agencies, through the WaterReuse Association, have already provided extensive comments on the current draft waste discharge requirements, which would require significant changes to the permit. We are concerned that there is not enough time for State Board staff to adequately address the issues that have been raised by the June 3rd proposed adoption date. Inadequately vetted permit requirements could result in unnecessary costs or inadvertent regulatory barriers to water recycling. We recommend that the Board delay the permit adoption in order to develop a cohesive permit.

If the permit must be adopted on June 3 to increase recycled water use during the drought, it should be adopted as an interim permit with the requirement that State

A public agency providing a safe and reliable water supply to the San Diego region

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Board staff return to the Board in less than six months with a proposed long term permit. This would also allow reissuance as water reclamation requirement(WRRs), which would be more appropriate than the current waste discharge requirements that are being proposed. It may be helpful for staff to convene a workgroup or conduct workshops to develop a final permit which is roundly well accepted and practical to implement.

Agencies with Existing Permits

The Water Authority's member agencies currently operate under existing recycled water permits which effectively allow the safe use of recycled water. Agencies with recycled water or waste discharge permits that are acceptable to them should be allowed to continue to operate under their existing permit at their discretion. We request that a finding to this effect be added to the draft permit. In some cases, mandating agencies to move to a new permit could be costly, time consuming, and unnecessary.

For agencies that would like to move from their current permit to the statewide permit, the draft permit does not clarify how currently permitted projects would be transitioned to a general statewide permit. It is not clear if those agencies would be required to prepare a new engineering report, even though the current treatment and uses have already been approved. Requiring a new engineering report could be costly and time consuming. These agencies should be exempted from filing an engineering report.

Site Specific Permits

The draft permit describes conditions that must be met by Regional Water Boards to require a site specific permit instead of using the general permit (see Finding 28). These conditions are broad and inappropriately vague. For example, Regional Boards can require a site specific permit if the proposed discharge will degrade water to an "unacceptable extent". This section should be revised to provide clear and specific criteria.

Monitoring and Compliance

The draft permit has overly burdensome monitoring and reporting requirements that would result in information being collected that is of no value in managing a recycled water system or verifying compliance with the permit. For example, Attachment A (Notice of Intent) requires detailed information for each user site, including a site map and a water and nutrient balance. Some recycling programs have thousands of irrigation connections that are substantially the same (e.g.

residences), and providing this information for each such site is infeasible and without benefit. Another example is that Attachment B (Monitoring and Reporting Program) requires priority pollutant sampling at each user site when one sample at the recycled water treatment plant would be sufficient and consistent with the Recycled Water Policy.

The reference to disinfection by-products implies that agencies would be required to apply additional treatment to remove these constituents. It has not been demonstrated that disinfection by-products in recycled water have had an impact on groundwater quality, and regulating for these constituents is not practical or necessary.

Agronomic Rates and Nutrient Management

As drafted, the requirement to apply recycled water at agronomic rates is unclear on how this would be implemented. This implies that the permitted agency would be required to establish water budgets for every user on their system and would need to enforce that requirement. This is not a practical approach. The most practical and effective approach would be for recycled water agencies to provide the users with information on their water quality and educate the use site supervisors through local training and other information on how to apply recycled water at an agronomic rate. Often the recycled water in the San Diego region has contained manganese in excess of the basin plan objective. The San Diego Water Board has allowed this based on the uptake of manganese as a nutrient to plants. Application at agronomic rates should accommodate this approach.

The draft permit requires compliance with approved salt and nutrient management plans. The Regional Board does not approve salt and nutrient management plans, but can incorporate key provisions of the plans into their basin plan. The permit should require compliance with basin plan provisions for implementing the salt and nutrient management plans.

Overspray

The permit appears to contain an absolute prohibition on recycled water escaping the use area as surface water or airborne spray. These provisions cannot be practically met. Agencies can use best irrigation practices to minimize overspray and incidental runoff.

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Thank you for the opportunity to comment on this draft permit. We look forward to working with the State Board to advance recycled water use in California. If you have any questions regarding this letter, please contact Toby Roy at (858) 522-6743

Sincerely



Ken Weinberg
Director of Water Resources