Public Comment
Recycled Water Policy
Deadline: 7/3/12 by 12 noon

THE CITY OF SAN DIEGO

July 3, 2012

Electronic Submission: commentletters@waterboards.ca.gov

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

RECEIVED
7-2-12
SWRCB Clerk

Dear Ms. Townsend:

Subject: Comment Letter – Amendment to the Recycled Water Policy

The city of San Diego, Public Utilities Department (San Diego) is pleased to provide the State Water Resources Control Board (State Water Board) with comments on the proposed amendments to the Recycled Water Policy. We commend the State Water Board for making this effort to provide guidance on monitoring requirements for Constituents of Emerging Concern (CECs).

The City has long been a leader in the production and delivery of recycled water for non-potable uses and is currently investigating an indirect potable reuse project. The city owns and operates two reclamation facilities with the capacity to treat 45 million gallons per day (mgd) for irrigation and industrial uses.

In June 2011, the City began operating and testing a one million gallon per day demonstration-scale facility to examine the feasibility of using advanced water treatment technology on recycled water to augment supplies in a local reservoir. If successful, a future full-scale facility could ultimately reduce the demand for imported water and become the first indirect potable reuse/reservoir augmentation project in California. The City continues to work with the California Department of Public Health (CDPH) and the San Diego Regional Water Quality Control Board to ensure citizens' public and environmental health will not be compromised with any planned indirect potable reuse/reservoir augmentation project. We expect the valuable information gained from this demonstration project will help make similar projects a reality statewide.

As stated in a previous correspondence, the City supports the recommendations made by the Scientific Advisory Panel in the June 2010 Report; *Monitoring Strategies for Chemicals of Emerging Concern (CECs) in Recycled Water – Recommendations of a Scientific Advisory Panel*. It appears the State Water Board has effectively modeled the draft amendments to the

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Recycled Water Policy to closely reflect those recommendations. We found that the draft amendments were well organized and in a format that was easy to understand. With that in mind, we support the draft amendments to the Recycled Water Policy and respectfully provide some brief comments in the attached enclosure. If you have questions regarding the City's comments please contact Peter Martin, Jr. at (619) 533-4157 or PDMartin@sandiego.gov.

Sincerely,

Marsi A. Steirer
Deputy Public Utilities Director

PM/lf

Enclosure

cc: Almis Udrys, Deputy Director of Intergovernmental Relations, Mayor's Office

Enclosure – City of San Diego Comments: Draft Amendments to the Recycled Water Policy

Comment	Section	Page(s)	Comments/Proposed Changes
1	General		We agree with the State Water Board's assessment that Recycled Water for irrigation should not be monitored for health relevant CECs due to the fact that there is a very low risk of ingestion. This clarifying point is a marked improvement over the draft provisions included in the Staff Report from November 2010.
2	General		We encourage the State Water Board to continue to work closely with the CDPH to ensure that there is consistency when it comes to permitting and subsequent monitoring requirements for Groundwater Recharge Reuse projects. Efforts should be focused to ensure efficiency and effectiveness of reporting is maximized.
3	Recycled Water Policy: 10.b.(2),	14	The five year timeframe for which the scientific advisory panel shall reconvene for updates is unclear. The panel did recommend periodic review as well. We suggest for consistency, the policy should be updated from the effective date of the amendments to this policy. Suggested changes are in double underline/strikeout as follows: (2) The panel or a similarly constituted panel shall update the report every five years from the effective date of the monitoring requirements established in Attachment A.

4	Attachment A: Section 1.2, Table 2	5	The following language is unclear as to how surrogates would be chosen for irrigation projects that do not use chlorination for disinfection: *Surrogates shall be selected on a case-by-case basis and shall be appropriate for the treatment process or processes. For example, chlorine residual is not an appropriate surrogate for projects that do not use chlorine-based compounds for disinfection.* The language should be clearer as to the process to how these surrogates will be chosen. We suggest a requirement for consultation with both the CDPH and RWQCB to determine what surrogates are appropriate in lieu of chlorine disinfection. Leaving this up to the interpretation of the RWQCB could require the monitoring of several extra surrogates that may not be in line with the streamlined objectives of these amendments.
5	Attachment A: Monitoring Locations 2.1.1-3, 2.2.1-3,	6-7	It is unclear if it is possible for the specified monitoring locations to be consistent with the locations provided in CDPH's recently released *Draft Regulations for Groundwater Replenishment with Recycled Water*. This section should be reviewed for potential connected effort between the two agencies. We recommend language be included to provide a Groundwater Recharge Reuse project permittee an option (where feasible) to use the monitoring locations specified in the CDPH's 2011 draft policy to satisfy the requirements of this policy. This would provide guidance so that the placement of extra monitoring locations would not be necessary just to satisfy the State Water Board's requirements.
6	Attachment A: 4.2 Evaluation of Health-relevant CEC Results (table 7)	17	We support the provision that would allow a mechanism for a permittee to discontinue monitoring for constituents that meet the MC/MTL threshold over the specified amount of time after consultation with CDPH and the RWQCB. This translates to an efficient use of resources.