

July 2, 2012

Charles R. Hoppin, Chair and Members  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814



Via Email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**SUBJECT: COMMENT LETTER – AMENDMENT TO THE RECYCLED WATER POLICY**

Dear Chair Hoppin and Members of the Board:

The Water Replenishment District (District) of Southern California is pleased to submit comments on the proposed Amendment to the Recycled Water Policy regarding monitoring of constituents of emerging concern (CECs) in recycled water used for groundwater recharge and landscape irrigation. The District manages two of the most utilized urban groundwater basins in the State- the Central and West Coast Groundwater Basins. To help replenish these groundwater basins, the District uses over 65,000 acre-feet of recycled water per year, both by surface spreading and direct injection, and plans to use more recycled water for similar purposes in the future. The use of recycled water is critical to sustaining the quality of these basins and greatly reduces the demand for water imported from the Bay Delta and the Colorado River. We consider the recommendations to be adopted by the State Water Board (Board) vital to the continued safe use of recycled water for these purposes under appropriate conditions.

The District's comments reflect the knowledge and experience gained by nearly 50 years of managing, operating, and studying groundwater recharge projects using recycled water. This experience includes the resolution of issues to achieve consistency in the regulation of recycled water, in particular the petition for the Alamitos Barrier Project permit that served as the catalyst for the Board's Recycled Water Policy. The District commends the Board for its leadership and commitment to develop consistent policy guidance for recycled water projects throughout the State, and for committing to a process of using sound science to determine appropriate monitoring requirements for recycled water use. The District believes that such a process is essential in order to build consider confidence in the safety and benefits of recycled water.

For the most part, we concur with the proposed amendment, which largely incorporates the panel's approach and many of our comments provided at the December 15, 2010 public hearing and in our January 10, 2011 written comments. Most of the remaining concerns that the District has with regards to the proposed amendment are satisfactorily addressed in the comment letter to be submitted jointly by Association of California

Water Agencies (ACWA), the California Association of Sanitation Agencies (CASA) and WateReuse California (collectively, the Associations), which is incorporated herein by reference.

One issue that we would like to underscore for your consideration is the groundwater monitoring frequency for surrogates (ammonia, total organic carbon, nitrate, and Ultraviolet (UV) light absorption) during the initial assessment phase for surface application projects. According to Table 3 of the draft Attachment A, "Requirements for Monitoring Constituents of Emerging Concern for Recycled Water", the surrogates (to be chosen as appropriate for the treatment process) are to be monitored in groundwater on a weekly basis for the first three months, and then on a monthly basis for the succeeding nine months. Furthermore, page 8 of Attachment A states, "Existing projects demonstrating prior assessment of CECs and surrogates **equivalent** to the initial assessment phase requirements of this Policy may not be required to conduct the initial monitoring phase and are eligible for baseline monitoring phase requirements (Section 3.2)" (highlight added for emphasis). Very few projects, if any, will have monitoring data replicating the exact same frequency and duration-- i.e., weekly for the first three months, then monthly for the next nine month. However, surface application projects with a long, demonstrated history of successful operation, such as the Montebello Forebay Spreading Grounds which has been using recycled water for groundwater recharge for 50 years, have a tremendous amount of monitoring data on most of the surrogates for the recycled water, the headworks, and groundwater, enabling a robust characterization of the recycled water both before and after its release to the spreading grounds. In this context, we recommend adding a footnote after the word "equivalent" to clarify that the "to be considered equivalent, data from prior assessment need not replicate the exact frequency and duration of the initial assessment phase requirements specified in Table 3, if the overall robustness and size of the available data are deemed sufficient to adequately characterize the surrogates and treatment performance under consideration".

We thank you in advance for your careful consideration of the comments submitted by the Associations and the District. We look forward to our continued partnership as we work for our shared goal of a safe, abundant water supply for California.

Sincerely,



Robb Whitaker, P.E.  
General Manager