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Director

State of California—Health and Human Services Agency
California Department of Public Health

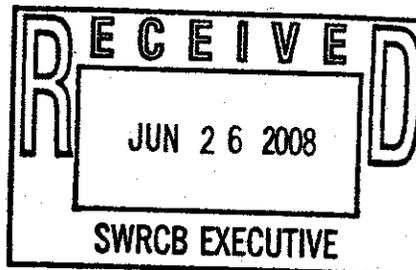


ARNOLD SCHWARZENEGGER
Governor

Public Workshop
Landscape Irrigation
Deadline: 6/26/08 by 12 p.m.

June 26, 2008

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



Dear Ms. Townsend:

The California Department of Public Health (CDPH) thanks the State Water Resources Control Board for the opportunity to speak at the public hearing on June 18, 2008 and to comment on the scope of the proposed statewide general permit for landscape irrigation uses of recycled water (proposed general permit) in response to Assembly Bill (AB) 1481.

It is our understanding that the proposed general permit will establish eligibility criteria intended to simplify the process for the permitting of certain recycled water projects. This will streamline the permitting process for most landscape irrigation projects, while allowing the Regional Water Quality Control Boards (Regional Boards) to focus on projects that require review due to unique site-specific conditions. We have the following comments for your consideration:

1. A Regional Board, in consultation with CDPH, may determine that projects and use-sites with complex or unusual circumstances (i.e., unique or site-specific conditions) need additional requirements beyond those in the proposed general permit. CDPH recommends that eligibility to be covered under the proposed general permit not include such projects and use-sites. Based on this, CDPH recommends that the proposed general permit not be used for the following types of projects and use-sites:
 - Groundwater recharge with recycled water
 - Dual plumbed facilities such as those used for the flushing of toilets and urinals
 - Dual plumbed facilities for individually owned residential landscaping
 - Agricultural use

- Cooling tower or other industrial uses
 - Projects involving hauling of recycled water
 - Projects to use recycled water for processing of food or drink intended for human consumption
 - Projects or use-sites in which there is evidence that "emerging contaminants" are a concern. For instance, sites close to drinking water sources.
 - Use-sites that have unusually complex piping systems that result in a high risk of cross-connections with the potable water system.
2. CDPH has concerns regarding the use the proposed general permit for projects or use-sites that would receive recycled water not meeting the definition of disinfected tertiary recycled water as contained in California Code of Regulations (CCR), Title 22. CDPH recommends that such projects or use-sites be excluded from the proposed general permit. However, CDPH recommends that a separate general permit be developed for projects or use-sites where the recycled water does not meet the definition of disinfected tertiary recycled water.
3. CDPH recommends that the following requirements be included for all projects covered by the proposed general permit that use disinfected tertiary recycled water:
- An engineering report addressing all elements outlined in the CDPH "Guidelines for the Preparation of an Engineering Report for the Production, Distribution and Use of Recycled Water" (March 2001) shall be submitted to CDPH for review and approval prior to permit issuance.
 - In addition to the use site requirements prescribed by Section 60310 of the Water Recycling Criteria, the project shall be managed and operated in accordance with the following:
 - ✓ An ordinance or set of rules of service shall be developed by the producer or distributor of the recycled water which outlines all use site controls to be practiced. These documents shall be submitted to CDPH for review and approval prior to permit issuance, and referenced in the permit.
 - ✓ Off-hour irrigation shall be practiced to minimize public contact with the recycled water.

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- ✓ The producer or distributor shall designate a recycled water supervisor who is responsible for the recycled water system. Specific responsibilities of the recycled water supervisor would include the proper installation, operation, and maintenance of the irrigation system; control the on-site piping to prevent any cross-connections, compliance of the project with measures to prevent potential hazards and maintenance of "as-built" plans for the recycled water distribution system.
- ✓ The producer or distributor shall develop an acceptable set of procedures to verify on an ongoing basis that cross-connections have not occurred between the Potable Water and Recycled Water piping systems. Any backflow prevention device installed to protect the public water system shall be inspected and maintained in accordance with Section 7605 of Title 17, CCR.
- ✓ The recycled water piping system shall not include any hose bibs. Quick couplers that are different from that used on the potable water system may be used.

We have tried to anticipate comments that you may receive with the above comments; however, we expect that we may not have anticipated all possible comments. For that reason, we are available to help address any comments that you receive, so that the general permit(s) that you develop will be protective of public health and meet AB 1481. Please contact Brian Bernados of the CDPH Recycled Water Unit at (619) 525-4497 or Brian.Bernados@cdph.ca.gov, if you have any questions on our recommendations.

Sincerely,



Gary H. Yamamoto, P.E., Acting Chief
Division of Drinking Water
and Environmental Management