



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

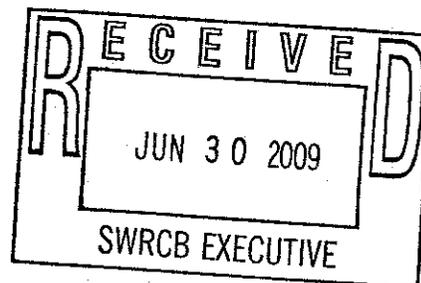
STEPHEN R. MAGUIN
Chief Engineer and General Manager

June 30, 2009

Via Electronic Mail and U.S. Mail

Mr. Charles R. Hoppin, Chair
and Members of the Board
State Water Resources Control Board
Post Office Box 100
Sacramento, CA 95812-0100
Attention: Jeanie Townsend, Clerk to the Board

Dear Chair Hoppin and Members of the Board:



General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water

The County Sanitation Districts of Los Angeles County (Sanitation Districts) offer the following comments regarding the State Water Resources Control Board's (State Water Board's) revised draft Statewide General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water, dated June 18, 2009 (Revised General Permit). As background, the Sanitation Districts provide for the wastewater and solid waste management needs of over five million people in 78 cities and unincorporated areas within Los Angeles County. As part of that program, the Sanitation Districts operate ten water reclamation plants that currently provide approximately 85,000 acre-feet per year of recycled water to over 560 different sites for a variety of uses, including landscape irrigation, agricultural irrigation, industrial processing, environmental enhancement, and groundwater recharge. Since the inception of its program in 1962, the Sanitation Districts have delivered over 2 million acre-feet of recycled water for beneficial reuse.

The Sanitation Districts have previously submitted comments on two earlier versions of the Revised General Permit, and have additionally participated in several stakeholder meetings with State Water Board staff during its development. Most recently, the Sanitation Districts participated in a stakeholder meeting held on May 21, 2009 (Stakeholder Meeting) that included representatives from the State Water Board, the California Department of Public Health, Coastkeeper, WaterReuse, and the California Golf Association, as well as municipalities, water agencies, and wastewater agencies. During the Stakeholder Meeting, it appeared that all stakeholders, including State Water Board staff, were able to agree on changes to the Revised General Permit that would encourage expanded use of recycled water while being protective of the environment. However, the Revised General Permit is not entirely consistent with the changes that were discussed at the Stakeholder Meeting. Without further changes, particularly with regard to the Monitoring and Reporting Program (MRP) and the required inspection frequency for recycled water use sites, the Sanitation Districts believe the Revised General Permit would have the unfortunate and unintended effect of discouraging recycled water use.

The Sanitation Districts are supportive of changes to the Revised General Permit that are consistent with those agreed upon at the Stakeholder Meeting. These include the removal of the requirement for a bound logbook to be maintained at each recycled water use site, and the addition of language specifying that information on the application of water and nutrients at agronomic rates be provided during recycled water use site supervisor training. The Sanitation Districts are also supportive of other changes to the Revised General Permit that are consistent with our written comments, including amendments to the requirements regarding hose bibs and

addition of language stating that overlapping coverage under existing water recycling permits automatically becomes void when coverage is obtained under the Revised General Permit.

However, other changes were made to the Revised General Permit that are not consistent those discussed at the Stakeholder Meeting. The most problematic changes are those made to monitoring and reporting requirements for the volumes of water and amounts of nutrients and salts applied to sites where recycled water will be used. During the Stakeholder Meeting, a reasonable and protective approach to such monitoring and reporting was proposed, whereby the volume of recycled water and acreage of application for each groundwater basin or sub-basin would be reported. The MRP was also to have included the general known agronomic rate of water for the basin, so that this could be compared against the recycled water application rate, to ensure that overall agronomic rates for water are not exceeded. For nutrients, the amount applied at each site would not be reported, but rather the Administrator of the General Permit would report the nutrient content of the recycled water to users annually, along with illustrative nutrient loading rates so that users could adjust fertilizer application rates accordingly. The Revised General Permit was to be amended to ensure that all end use site supervisors received training to understand the agronomic rates and the need to adjust fertilizer application rates.

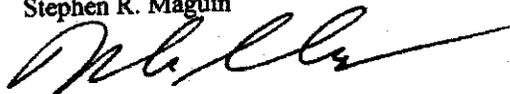
While the Revised General Permit appropriately included the basin-wide reporting of recycled water usage and applied acreage, as well as the site supervisor training requirements, it did not include the basin-wide requirement to report the agronomic rate. More notably, the MRP still requires that the volume of non-recycled water and fertilizer applied to each recycled water use site be determined on a monthly basis. Although the MRP was changed such that only the aggregate rates for non-recycled water and fertilizer would be reported for each basin, preparing the aggregate totals still requires collection of detailed information for each site. The Sanitation Districts submitted comments as to why this is not appropriate in previous letters submitted to the State Water Board on April 27, 2009 and May 26, 2009. In summary, the level of documentation that would be required would place an onerous burden on recycled water users, potentially even reducing overall recycled water use.

The Revised General Permit was also amended to specify that all recycled water use areas be inspected at least quarterly (Provision C.9), as opposed to previous versions that required only that "periodic inspections" be conducted. The Sanitation Districts believe that requiring quarterly inspections of every use site is overly stringent and unnecessary, and does not conform to Title 22 or the Water Code. Even for dual-plumbed sites, Title 22 only requires annual inspections, and Master Reclamation Permits issued under the Water Code only require inspections on a "periodic" basis. The Sanitation Districts believe that the frequency of inspection should be tailored for each use site, depending on the site's compliance history, the volume of recycled water used, and the type of site (e.g., freeway median vs. schoolyard). Establishment of a prescriptive quarterly inspection frequency in the General Permit will result in a waste of resources, and another disadvantage to using recycled water. The Sanitation Districts therefore recommend that the inspection frequency in the Revised General Permit be changed back to "periodic."

In closing, the Sanitation Districts would like to reiterate support of the State Water Board's effort to develop a general permit that would expedite permitting of recycled water for landscape irrigation. However, unnecessarily onerous requirements in the Revised General Permit will limit its use, and set a precedent for other regulatory authorities to copy that will further discourage the use of recycled water. If you have any questions about this letter or require additional information, please contact Ann Heil at this office at extension 2803.

Very truly yours,

Stephen R. Maguin



Mike Sullivan
Section Head
Monitoring Section