



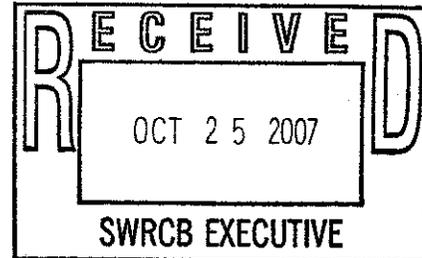
Delta Diablo Sanitation District

12/4/07 Bd. Mtg.
Water Recycling Policy
Deadline: 10/26/07 Noon

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October 25, 2007

State Water Resources Control Board
Executive Office
P. O. Box 100
Sacramento, CA 95812-0100



ATTN: Ms. Jeanine Townsend, Acting Clerk to the Board

SUBJECT: COMMENTS ON PROPOSED WATER RECYCLING POLICY

Thank you for your leadership in undertaking the Water Recycling Policy ("Policy") to promote the use of recycled water. We appreciate the opportunity to comment on the proposed policy and will be closely following the policy as it is developed.

We share the goals that are set forth in the Policy recitals, and support the overall approach of specifying the appropriate application of the antidegradation policy and the importance of role of the Department of Public Health (DPH) on matters of human health protection. We applaud the Board for acknowledging that salt accumulation in groundwater is an issue that can only be effectively addressed by regional salt management and not by overburdening the use of recycled water. We also think it is critical to distinguish between irrigation, which is a use of water with only incidental effects, and recharge projects designed to augment groundwater.

We support the development of a Policy that recognizes and treats recycled water as a resource rather than a waste and would like to see the Policy state the Board's support for recycled water use even more clearly and emphatically. For instance, State Water Resources Control Board Resolution No. 77-1 states that:

"The California Constitution provides that the water resources of the State be put to beneficial use to the fullest extent of which they are capable, and that waste or unreasonable use or unreasonable method of use of water be prevented, and that conservation of such waters is to be exercised with a view to the reasonable and beneficial use thereof in the interest of the people and for the public welfare:

- The California Legislature has declared that the State Water Resources Control Board and each Regional Water Quality Control Board shall be the principal state agencies with primary responsibility for the coordination and control of water quality;
- The California Legislature has declared that the people of the State have a primary interest in the development of facilities to reclaim water containing waste to supplement existing surface and underground water supplies;

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- The California Legislature has declared that the State shall undertake all possible steps to encourage the development of water reclamation facilities so that reclaimed water may be made available to help meet the growing water requirements of the State.”

Likewise, Water Code section 461 reads: “It is hereby declared that the primary interest of the people of the state in the conservation of all available water resources requires the maximum reuse of reclaimed water in the satisfaction of requirements for beneficial uses of water.” In light of the water supply emergencies in the State, promoting the use of recycled water is a significant benefit of the people of the State of California. For example, the use of recycled water would increase water supply reliability by reducing dependence on the Delta.

When appropriately managed, recycled water is safe. (Water Code section 13529(f).) For both groundwater recharge and irrigation projects, compliance with the provisions of the Water Recycling Policy and Title 22 of the California Code of Regulations constitutes best practicable treatment and control for purposes of the antidegradation policy.

Delta Diablo Sanitation District (DDSD) currently provides an annual average of 7 million gallons per day (mgd) of recycled water for use as cooling tower supply for two power plants and for irrigation of over 20 acres of parks and landscaped areas. DDSD’s Recycled Water Facility (RWF) can treat up to 12.8 mgd of recycled water (peak flow) and is configured to expand up to 19 mgd. Secondary effluent is diverted upstream of the Water Pollution Control Facility (WPCF) disinfection, and undergoes flocculation, clarification, sedimentation, filtration and disinfection before being distributed to recycled water users.

There is significant potential for expansion of recycled water use in the DDSD service area to be an important and significant element of the water supply portfolio for the area’s growing needs. In fact, recent developments have prompted DDSD to lead a study of a Regional Industrial Reuse plan to identify industrial reuse opportunities within DDSD’s service area and how they can be accommodated. In addition, the District is proceeding forward with a \$15 million expansion program to make recycle water available for irrigation at 2 local golf courses and 10 city parks. This work will help maximize the extent to which this area’s dependence on delta water can be reduced.

We support the use of an interim salt management strategy. However, the 300 mg/L for TDS for irrigation projects is a one-size-fits-all solution that could unintentionally result in shutting down facilities that today are collectively taking notable pressure off of the water supply system. It is unlikely that this standard is consistently achievable; many existing or planned water recycling projects would no longer be viable. Presently, our annual average TDS ranges from 190 to 240

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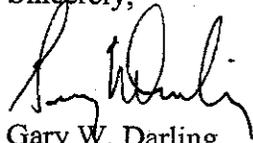
mg/l for water supply and from 1350 to 1650 mg/l for recycled water (data is limited for the recycled water). **Despite the fact that the existing DDSD recycled water plant produces water exceeding Title 22 standards, it would not meet the proposed 300 mg/L limit as currently defined.** We encourage you to consider the range of alternatives presented by WaterReuse. Given the substantial variance in source water quality, we support locally driven basin-wide planning for management and sustainable use of groundwater as the correct and appropriate way to preserve groundwater quality.

Also, the Policy should explicitly state that it does not alter liability under existing law.

Incidental amounts of recycled water runoff that occur as the result of normal irrigation operations should be managed and permitted using existing mechanisms in the same manner as other types of irrigation runoff, such as municipal separate storm sewer system permits, general permits, or master reclamation permits.

The Policy is a good start towards articulating a balanced approach to considerations of safety and reliability. It is a Policy that can integrate the Board's responsibilities for the adequacy of the supply and the quality of the supply. We look forward to refinement of the proposed policy to address these issues.

Sincerely,



Gary W. Darling
General Manager

CQ/GWD:dcj

cc: File CORP.15.03-CORRES
File RWF-CORRES
Chron File