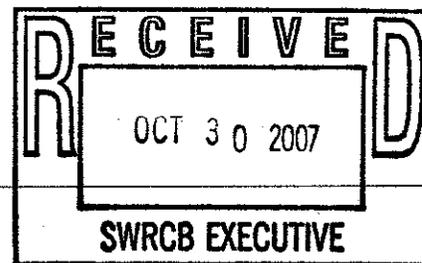


commentletters - Comment Letter - proposed Water Recycling Policy

From: "Wable, Milind" <WableMV@cdm.com>
To: <commentletters@waterboards.ca.gov>
Date: Tuesday, October 30, 2007 3:06:51 PM
Subject: Comment Letter - proposed Water Recycling Policy



I realize it's past the October 26 deadline, but submitting these just in case deadline is extended or you are otherwise able to consider.

Here are the comments:

LATE COMMENT

General Comment:

It would help to encourage use of recycle water if the policy presented recycled water in a more positive light - as a valuable resource rather than something to dispose of. Recognizing that "traditional" surface and groundwater sources are sometimes far from pristine can help elevate the perception of recycled water.

Specific Comments:

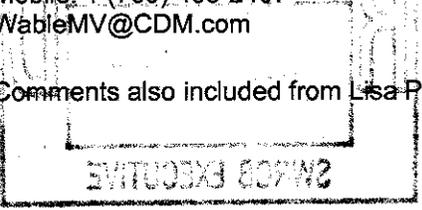
- Page 4 - Item 7: Need to provide time schedule context for policy as a whole and specifically implementation of the additional "Waste Discharge and Water Reclamation Requirements".
- Page 2 - Item 12: It may theoretically be possible to limit source-water-to-recycled-water TDS increase to 300 mg/L purely from best available technology point-of-view. However, actual implementation would potentially involve implementation of or modifications to pretreatment programs and regulation of other TDS sources not currently regulated, including water softeners. The time and cost involved in this should be considered.
- Page 4 - Item 7(a): Development and implementation of a nutrient management plan should apply to ALL irrigation, not just irrigation with recycled water. Recycled water is still only a very small fraction of all irrigation water and should not have to carry the burden of compensating for the significantly larger nutrient loads resulting from irrigating with other sources without a nutrient management plan. While irrigation with other sources may be outside the jurisdiction of the Regional Water Boards and the CDPH, nutrient management plans will yield maximum benefit only when applied to irrigation as a whole. WDRs control only a small fraction of irrigation water and are probably not the most appropriate platform for enforcing nutrient management plans. Further, any requirement that is seen as applicable to recycled water but not to other irrigation water is more likely to be perceived as an additional obstacle to recycled water use. This is counter to the Policy's stated objective of encouraging and broadening the use of recycled water. The same level of protection is better obtained by working with other agencies to require nutrient management plans for ALL irrigation, so that this requirement is not perceived as an additional burden by current and potential users of recycled water.
- Page 4 - Item 7(c): Calculating the exact amount of water needed will be a complex process given the large number of variables. Suggest this item be better defined in terms of how this will be calculated, reviewed, and approved and by who (what qualifications).
- Page 6 - Items 17 and 18: Seems like these items create additional liabilities for anyone considering use of recycled water that do not exist under current regulations. How is this encouraging or broadening use of recycled water?
- Page 1 - Item 2: Delivery system failures can also affect the supply of reclaimed water, not just potable water.
- Page 1 - Item 3: This statement may not be true if you treat the reclaimed water with MBR/RO - so the cost savings is dependent on the level of treatment used to produce the recycled water.
- Page 2 - Item 11: Overapplication of not just recycled water but other waters (i.e. groundwater, etc.) would increase the amount of salts even if not in the magnitude of reclaimed water.
- Page 2 - Item 16: Per the USGS survey done many surface waters contained microconstituents. Thus, these constituents are not just in reclaimed water but also numerous surface water sources.
- Page 3 - Item 26: One additional benefit would be to delay or reduce the need for additional imported water and reducing the competition for that water.

Milind V. Wable, Ph.D., P.E., BCEE
 Senior Project Manager
 CDM

1925 Palomar Oaks Way Ste 300
Carlsbad, CA 92008-6526, USA

Phone and Fax: 1 (760) 710-4707
Mobile: 1 (760) 458-2407
WableMV@CDM.com

Comments also included from Lisa Prieto of CDM.



THE COMMENT