



May 27, 2014

Chair Felicia Marcus and Board Members
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



SENT VIA EMAIL: commentletters@waterboards.ca.gov

Subject: Comment Letter – General Order Waste Discharge Requirements for Recycled Water Use

Dear Chair Marcus and Members of the Board:

The Santa Clara Valley Water District (District) thanks the State Water Resources Control Board (Water Board) for the opportunity to comment on the General Order for Recycled Water Use (General Order).

As the primary water resources agency for Silicon Valley, the District works to protect the quality of groundwater and surface water in Santa Clara County. In cooperation with local partners, the District is also expanding the use of recycled water. These efforts include completing the \$72 million Silicon Valley Advanced Water Purification Center (SVAWPC) this year that is being used to expand the capacity of the South Bay Recycled Water system in San Jose as well as enhance the quality of nonpotable recycled water delivered by this system. The District's SVAWPC permit is currently covered under Regional Water Quality Control Board - San Francisco Region Order 96-011. The District is also planning additional recycled water infrastructure to meet the county's future needs.

The District supports Water Board efforts to streamline the permitting of recycled water uses included in the General Order. The Order can be clarified or strengthened in several areas, and the District appreciates your consideration of the following comments.

Antidegradation Analysis

The General Order identifies salinity, nutrients, pathogens, and disinfection by-products as constituents of concern with the potential to degrade groundwater. The General Order discusses how the risks from salinity, nutrients, and pathogens are addressed, through Order requirements, Salt and Nutrient Management Plans, or other provisions such as Title 22 setbacks. The General Order should clarify how it addresses groundwater degradation risks from disinfection by-products. District monitoring indicates evidence of formation in the distribution system and the presence of nitrosamines in shallow groundwater at recycled water irrigation sites. The General Order requires that recycled water be monitored annually for priority pollutants, which include disinfection by-products. To protect receiving water bodies, the District recommends the General Order clarify that a Regional Water Board may require additional action (including source control, treatment, or additional monitoring) if the recycled water results for the priority pollutants indicate a significant threat.

Under the General Order, regulated discharges will be to numerous water bodies, each with its own chemical characteristics. To ensure the protection of local high-quality water, the District supports the General Order provision that a Regional Water Board may require a site-specific order if recycled water use under the General Order could result in unacceptable water quality degradation.

Purpose and Applicability

This section outlines how applicants may obtain coverage under the General Order, but does not address how it applies to existing permit holders. The District recommends that the Regional Water Board allow existing permit holders to elect whether to maintain site-specific permits or be covered under the General Order.

Basin Plans and Beneficial Uses

Table 2 (Summary of Identified Beneficial Uses by Region) appears to be incomplete. For example, groundwater recharge is not shown as a beneficial use in the Central Coast Region. The District recommends that this table be modified such that it is complete, or replaced by a reference to individual Basin Plans.

General Provisions

Item 4 indicates that an Administrator shall prepare a Salt and Nutrient Management Plan when directed by the Regional Board. The District recommends that this requirement clarify that any such plan will be developed in coordination with a local groundwater management agency and basin stakeholders.

Thank you for the opportunity to provide comments on the proposed General Order. If you have any questions, please contact Mr. Behzad Ahmadi, Groundwater Monitoring and Analysis Unit Manager, at (408) 630-2324.

Sincerely,



Joan Maher
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Water Supply Management Division
Santa Clara Valley Water District

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