



City of Anaheim
PUBLIC UTILITIES DEPARTMENT
Environmental Services



May 27, 2014

Ms. Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 15th Floor
Sacramento, CA 95814

Subject: Comments on Draft General Order for Recycled Water Use

Dear Ms. Marcus,

Thank you for opportunity to comment on the Draft General Order for Recycled Water Use that was issued April 29, 2014. Anaheim Public Utilities recently built and began operating a 50,000 gpd water recycling plant and we are fully supportive of the concept of simplifying the regulatory requirements for this relatively benign source of water for irrigation and toilet flushing. It is our opinion that since the treatment requirements for recycled water virtually prevent the possibility of it endangering public health, restrictions on the use of the water can be reduced from their current levels. However, the Draft General Order actually adds many new requirements for Administrators and Users of recycled water. We believe that the General Order should adhere to the State's Recycled Water Policy for streamlining the permitting process in order to promote the use of recycled water. Therefore, all unnecessary administrative burdens imposed by the General Order should be eliminated.

Anaheim Public Utilities offers the following suggestions for improving the General Order:

1. Salinity levels of recycled water will most likely exceed Basin objectives. However, as stated in Item 11, it "is not expected to be a significant source of salt loading relative to other potential sources....." Items 26 and 28, on the other hand, allow the Regional Board to disallow use of the General Order for numerous reasons, including high salinity levels. It is suggested that these sections be revised to prevent exclusion of the General Order unless the Regional Board makes a determination the recycled water from a specific project would cause a significant impact on groundwater quality. Since a small scale water recycling plant is highly unlikely to cause significant impacts to groundwater, the volume of recycled water discharged to land surface should be an important variable in the determination.
2. Item 24b and Prohibitions 2-5 limit the use of airborne spray irrigation and the application of recycled water to saturated soil. Spray irrigation is the only viable method of irrigating most landscape areas and while it is obvious that an irrigator should not cause a nuisance to its neighbor, some drift is inevitable. To absolutely prohibit any overspray from leaving a premise would essentially prohibit the use of recycled water for landscape irrigation. The General Order should be modified to allow unintentional overspray that does not become a nuisance. The General Order should also be revised to acknowledge that some saturated soil will occur while landscape irrigation is being conducted. The primary consideration should be that excessive runoff does not occur during irrigation, not whether saturated soil is present

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3. Item 26d discusses disinfection byproducts (DBPs) and treatment techniques to remove them. The treatment techniques mentioned will also remove the disinfectant as well as the DBPs and would be counterproductive to ensuring that recycled water remains free of pathogens in the distribution system. Since a disinfection residual helps to prevent the growth of pathogens and DBPs are not considered an environmental toxin, this section should be removed from the General Order.
4. Item C10 requires the Administrator to develop use requirements for the use of recycled water for dust control (and other uses). The General Order should be revised to state that this requirement only applies if the Administrator has Users that intend to use the recycled water for dust control (or other uses).
5. Item C11 requires the Administrator to provide a copy of the permit to the User. Although it is reasonable for the Administrator to provide the rules for which the User must comply, it should not be necessary to provide the User with rules for which the Administrator must comply. This requirement poses an unreasonable administrative burden and should be eliminated from the General Order.
6. Item C12 requires inclusion of User on-site observation reports and use data in the Administrator's annual report. It is unclear in the General Order what the purpose or value of these on-site observation reports are to provide. This appears to be an unnecessary administrative burden for both the User and the Administrator and should be eliminated from the General Order. The only monitoring that should be necessary is the monitoring of water quality being generated by the water recycling facility.
7. Item D4 requires the Administrator to prepare a Salt and Nutrient Management Plan (SNMP) when directed by the Regional Board. Per the State's Recycled Water Policy, SNMPs should be developed on a regional basis and compliance should be based on the likelihood of a particular recycling project actually causing a significant impact. As stated in the General Order, water recycling "is not expected to be a significant source of salt loading relative to other potential sources...." Therefore, a Regional Board should not be able to require a specific project to develop a SNMP.
8. Item D6a allows the Regional Board to terminate coverage for violation of any term or condition in the General Order. This is too strict. Termination of coverage should only be allowed if repeated or significant violations occur.
9. Attachment A, Section II.b.2 requires completion of a water balance and nutrient balance for each use area of each User site. There is no benefit or need for determining these values for each specific use area and this requirement is an unnecessary and unreasonable burden on water recyclers. This requirement should be removed from the General Order.
10. Attachment B, Section B.3.a requires an Administrator to require the User to conduct monitoring, including monitoring for priority pollutants. The only monitoring that should be required is of the water quality being produced by the water recycling facility. Additional pollutants are unlikely to be added within a distribution system or at a User facility. Therefore, testing of any pollutants at a User site is unnecessary and this requirement should be eliminated from the General Order.
11. Attachment B, Item B4 requires inspection of User facilities while recycled water is being used. Since most landscape watering is conducted at night, this is an unreasonable requirement. The item should be modified to state that the landscape irrigation should be activated when the inspector is on-site, if practicable.

12. Attachment D, the definition of Filtered Wastewater, Item 2, is too restrictive. By adding the requirement that MF, UF, NF or RO shall not exceed 0.2 NTU more than 5% of the time in a 24-hour period, the complexity of monitoring increases exponentially. It would simplify monitoring dramatically, and not harm water quality if the requirement merely stated that the turbidity shall not exceed a specified number. In order to achieve the necessary level of disinfection, a turbidity of 0.5 NTU should suffice.
13. General comment: Please continue to work with the recycled water community to develop a General Order that meets all of our needs. It may take more time to work cooperatively with the water recyclers, but it will result in a General Order that helps achieve the objectives of the State's Recycled Water Policy most effectively. This is a very important issue for the long-term sustainability of California's water resources and should not be rushed to meet an arbitrary schedule.

If you have any questions, please feel free to contact me via phone (714-765-4277) or email (dwilson@anaheim.net).

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Wilson", with a long, sweeping underline.

Richard Wilson
Environmental Services Manager