

**From:** Ron Weitzman  
**To:** [WB-DDW-RecycledWater](#)  
**Subject:** Comments by Water Plus on proposed framework for DPR regulations  
**Date:** Friday, May 18, 2018 4:56:04 PM

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To: Division of Drinking Water:  
From: Water Ratepayers Association of the Monterey Peninsula (Water Plus)  
Subject: Comments on proposed DPR regulations  
Date: 18 May 2018

DPR has not been used before. The only existing recycling to potability, in Orange County, uses Indirect Potable Reuse (IPR), which involves natural recycling in settlement ponds and miles of aquifers following engineered recycling consisting of reverse osmosis and other treatments of sewer water. Pure Water Monterey, a recycling project being developed by Monterey One Water (formerly Monterey Regional Water Pollution Control Agency) does not involve such extensive natural recycling following engineered treatment. For all practical purposes, this limitation qualifies Pure Water Monterey as a DPR project.

Pure Water Monterey also does not recycle only sewer water; it recycles a mix of sewer with agricultural runoff water containing highly toxic pesticides, a brew never before used for recycling. Nowhere in the proposed framework for regulating DPR projects does the word “pesticide” even appear. The pesticides contained in the source waters for

Pure Water Monterey include DDT, diazinon, and chlorpyrifos, among others.

Summary and Recommendations: The proposed framework is long overdue. Pure Water Monterey complies with existing IPR (Title 22) regulations, but it is a DPR rather than an IPR project, and it recycles toxic pesticides along with sewer water. The new regulations need to include safeguards against pesticide contamination of not only drinking but also irrigation water, also produced by Pure Water Monterey but without advanced treatment, and Pure Water Monterey must comply with the new regulations, not just the existing ones.

--Ron Weitzman  
President, Water Plus