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October 9, 2012

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 "I" Street, 24th Floor
Sacramento, CA 95814



Sacramento Regional Wastewater

Submitted via email to commentletters@waterboards.ca.gov

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SUBJECT: SRCSD Comment Letter - Amendment to the Recycled Water Policy

Dear Ms. Townsend:

Thank you for the opportunity to review and provide comment on the subject document. The following comments are being provided by the Sacramento Regional County Sanitation District (SRCSD) related to the September 12, 2012 proposed amendment titled *Requirements for Monitoring Constituents of Emerging Concern for Recycled Water*. SRCSD provides recycled water for landscape irrigation in south Sacramento County and complies with the requirements of the State's policies and NPDES permit requirements related to recycled water use. SRCSD is generally supportive of the proposed amendment to the Recycled Water Policy (Policy). However, we are providing comments that we think would help clarify the proposed Policy amendment.

Board of Directors
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- County of Sacramento
- County of Yolo
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- City of Elk Grove
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- City of Sacramento
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Attachment A is unclear regarding the requirements for monitoring surrogates for recycled water use in landscape irrigation projects. Section 2.2 Performance Indicator CEC and Surrogate Monitoring Locations states "To allow evaluation of individual unit processes or a combination of unit processes that provide removal of CECs, performance indicator CECs and surrogates shall be monitored at the locations described below and presented in Tables 3 through 5." Tables 3-5 are titled *Initial Assessment Phase Monitoring Requirements, Baseline Phase Monitoring Requirements* and *Standard Operation Monitoring Requirements* respectively, each containing requirements for landscape irrigation projects. However, **Section 3.0 Phased Monitoring Requirements** that contains these tables indicates in multiple sections that the phased monitoring requirements apply only to groundwater recharge reuse projects and does not mention landscape irrigation. For instance, the very first sentence in this section states "*The Regional Water Board shall phase the monitoring requirements for CECs and surrogates for groundwater recharge reuse projects.*" Landscape irrigation projects are not mentioned in this section.

- Stan Dean
District Engineer
- Ruben Robles
Director of Operations
- Prabhakar Somavarapu
Director of Policy & Planning
- Karen Stoyanowski
Director of Internal Services
- Joseph Maestretti
Chief Financial Officer
- Claudia Goss
Public Affairs Manager

Recycled Water Management with Nature

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There appears to be a contradiction as to whether phased monitoring applies to landscape irrigation projects. If not, Section 2.2 should be modified to reflect that only *Table 5 Standard Operation Monitoring Requirements* applies to landscape irrigation projects. Otherwise, Section 3.0 should be modified to indicate that phased monitoring applies to surrogates in landscape irrigation projects where applicable.

Comment #1

We would like to reiterate comments made in our previous letter dated July 3, 2012. SRCSD recommends, to the extent possible, that the State Water Board, the Department of Public Health and the Scientific Advisory Panel engage the product manufacturers in future efforts related to evaluating CECs and their impacts. SRCSD supports the concept of product stewardship that involves a combined responsibility of consumers, government agencies and product manufacturers working collaboratively to reduce the impact of product waste on public health, the environment and the economy. Manufacturers should actively participate in the scientific evaluation required for the entire life cycle management of their products and the associated monitoring and treatment from the waste derived from these products so their impacts to the environment, including impacts to water quality, can be minimized.

SRCSD supports the comments related to the proposed amendment provided in a separate, joint letter by the California Association of Sanitation Agencies (CASA), WaterReuse of California and the Association of California Water Agencies (ACWA).

Thank you for the opportunity to comment on the proposed Policy amendment. If you have questions regarding any of SRCSD's comments contained in this letter, please contact me at (916) 876-6038 or voightl@sacsewer.com.

Sincerely,

Lysa Voight
Senior Civil Engineer

LV:NKB/jc

cc: Stan Dean, SRCSD District Engineer
Prabhakar Somavarapu, SRCSD Director of Policy and Planning
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