

Jeanine Townsend, Clerk of the Board
State Water Resource Control Board
1001 "I" St, 24th Floor
Sacramento, CA 9814

March 23, 2016



Subject: Comment Letter – Urban Water Conservation Workshop

Re.: Urban Water Supply – Industrial Use – Bottled Water – Conservation of Municipal Potable Water

Background: Within the bottled water industry there are two main categories of bottled water, *Purified Drinking Water* and *Spring Water*. The water sources for each category is normally completely different. Typically, the source for *Purified Drinking Water* is a municipal source of potable water that feeds a bottling plant; whereas *Spring Water* is acquired from a Private Water Source Operator licensed by the California Dept. of Public Health, which verifies the water is from a Federally Certified source of *spring water*. A *Spring Water* source is typically a Private Water Source not associated with a municipality.

Purified Drinking Water: Primarily, *Purified Drinking Water* is produced by reverse-osmosis (RO) filtration of a potable urban water supply. As a result, approximately 80% of that potable urban water is converted to *Purified Drinking Water*, the remaining 20% is a brine concentrate. That concentrate is discharged to the plant's sewage treatment system and/or a municipal sewage drainline. In addition to the brine-loss there are other minor spillage losses during the bottling process that are typical for both *Purified Drinking Water* and *Spring Water*. Therefore, conservatively, it take 1.25-gallons from a potable urban water supply to produce 1-gallon of bottled *Purified Drinking Water*.

Spring Water: By law *Spring Water* cannot be obtained from a municipal potable water source nor can it be altered by RO filtration prior to bottling. As a result, the State's municipal potable water supply is not impacted when *Spring Water* is bottled. Additionally, the bottling of *Spring Water* is more efficient, because there is no brine-loss nor is any municipal potable water spilled as a result of the *Spring Water* bottling process.

Modification of Emergency Regulation: The 2013 ratio of *Purified Drinking Water* verse *Spring Water* bottled at an in-State State Certified water-bottling plant shall be the conservation baseline. If that ratio is reduced (alternatively, increased), i.e. the amount of *Purified Drinking Water* bottled is proportionately less (more) than the amount of *Spring Water* bottled in 2013; then the volume of the bottled *Purified Drinking Water* that created the reduction (increase) in the proportionate differential of the 2013 ratio is multiplied by 1.25. That quotient would be subtracted from (added to) the metered amount of municipal potable water supplied to the plant during the respective ratio-timeframe to increase (decrease) the percentage to water saved by the bottling plant. By doing so the State would establish an incentive (disincentive) for the in-State bottled water industry to use sources that are not part of a municipal potable water system, while encouraging the industry to continue to provide the State with the benefits of its existence.

Sincerely,

G. Scott Fahey