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State of California—Health and Human Services Agency
California Department of Public Health
Northern California Drinking Water Field Operations Branch
Monterey District



ARNOLD SCHWARZENEGGER
Governor

March 13, 2009

Cecile DeMartini
Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Dear Ms. DeMartini:

The California Department of Public Health (Department) previously reviewed the "Engineering Report on the Production, Distribution and Use of Recycled Water for the City of San Juan Bautista" prepared by Bracewell Engineering, Inc. dated December 2007, and provided comments to the Regional Water Quality Control Board by letter dated February 1, 2008. The Engineering Report was revised in August 2008 based on these comments, and resubmitted for the Department's review. We offer the following comments based on our review of the August 2008 Engineering Report:

Page 2; Section 2.2: This section states that "the City **will develop** procedures, restrictions and other requirements for the storage and use of recycled water...". Assuming this includes something beyond what is outlined elsewhere in this report, such documentation must be submitted to CDPH for review and approval when available and prior to the delivery of recycled water. The report also states that the above documentation will be based (in part) on "Guidelines for Use of Reclaimed Water for Irrigation and Impoundments". All program elements must comply with requirements for storage and use of recycled water in Title 22 adopted in 2000, not in the previously mentioned Guidelines which came out in 1988.

Figure 3 and discussion on Pages 5, 6 and 11: Why is UV used as the primary disinfectant to meet the 2.2 mpn coliform count, but for Title 22 treatment compliance purposes, chlorination is used to meet the 450 mg/l-min CT? Also, on Page 11, the report states that the chlorine contact chamber will provide 110 minutes of "calculated" detention time and will satisfy a 99 (did they mean 90?) minute modal detention. Was this verified through a tracer test pursuant to Section 60301.600?

Page 16 (2nd to last paragraph): This section states that landscaping staff will be trained in the use of recycled water and will be responsible for adhering to "regulations in the Water Reclamation Requirements that will be issued by the RWQCB". Generally, these requirements are outlined in the utility's Rules of Service, Ordinance or use-site agreements which are reviewed and approved as part of the permitting process. The report did not provide details of their overall program elements.

Page 15, Section 4.1: This section states that irrigation piping drawings for Creekbridge (a residential development in which "common areas" will be irrigated) are included in the Appendix. The report does **not** include an Appendix. No information was included regarding how the irrigation piping is laid out, what exactly the "common areas" are, and what control measures will be in place to ensure against unauthorized connections/uses by individual property owners.

Page 16, 1st paragraph: This paragraph states that design drawings for the new recycled water irrigation distribution system at the cemetery **will be** submitted to CDPH for review and approval prior to construction. Submittal of these plans to CDPH should be included as a condition of the permit issued by RWQCB for this project.

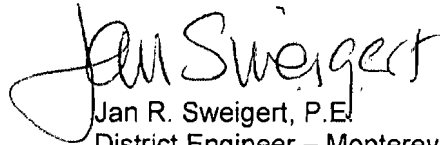
Page 16, 2nd paragraph: This paragraph indicates that any faucets will have signage, yet the last paragraph on Page 17 states that no hose bibs will be installed in areas accessible to the general public

unless they have keyed access. This seems to be conflicting. An explanation of how the project will comply with Title 22 Section 60310 (i) should be provided.

Section 4.1: a thorough assessment of abandonment of the existing cemetery irrigation system should be made and verification of cross connection control measures to be employed if any potable water piping remains on-site (e.g. for drinking fountains, urn filling stations).

The Department appreciates the opportunity to review and comment on this proposed project. If you have any questions concerning this letter, please contact Jeff Stone with our Recycled Water Unit at (805) 566-9767.

Sincerely,



Jan R. Sweigert, P.E.

District Engineer – Monterey Office

Drinking Water Field Operations Branch

cc: Bracewell Engineering, Inc.
 Steven Julian – Acting City Manager, City of San Juan Bautista
 Jeff Stone – CDPH Recycled water Unit
 San Benito County Environmental Health