Heal the Bay

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August 27, 2008

Ms. Blythe Ponek-Bacharowski
Unit Chief, Municipal Permitting Unit (NPDES)
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

Re: Comments on WATER RECYCLING REQUIREMENTS AND WASTE DISCHARGE REQUIREMENTS FOR CITY OF OXNARD GROUNDWATER ENHANCEMENT AND TREATMENT PROGRAM-NONPOTABLE REUSE PHASE I PROJECT (FILE NO. 08-070)

Dear Ms. Blythe Ponek-Bacharowski:

On behalf of Heal the Bay, we submit the following comments on the Regional Water Quality Control Board ("Regional Board") Water Recycling Requirements and Waste Discharge Requirements ("WDRs") for City of Oxnard Groundwater Enhancement And Treatment Program ("GREAT Program")-Nonpotable Reuse Phase I Project ("Phase I") (File No. 08-070). We appreciate the opportunity to provide these comments.

We would first like to commend the City of Oxnard for their efforts in development of this project. The City of Oxnard's efforts to recycle water are a vital component of establishing sustainable water resources for California's future. We strongly support local and regional water agencies that are moving toward clean, abundant, local water for California by performing water recycling. These sources of supply are drought-proof, reliable, minimize our carbon footprint and can be sustained over the long-term.

As a general comment, the WDRs should be consistent with the State Water Board's Water Reuse Policy. A draft of the Policy is currently available and will be discussed at the September 2nd State Water Board hearing. In addition, we have the following comments and questions:

GREAT Program Sub-Projects

The WDRs mention that two additional GREAT Program sub-projects will be covered under future permits. How soon will the subsequent phases of this project be developed and permitted? Will these sub-projects be pursued only after the 31.25 mgd is recycled under the proposed project?
As you know, brine disposal can be a big water quality issue with groundwater desalination projects. Where will this brine be discharged? It is vital that this discharge does not degrade the water quality of inland waterways or coastal waters.

Recycled Water Monitoring and Groundwater Monitoring

The monitoring and reporting program ("MRP") requires effluent monitoring of endocrine disrupting chemicals, pharmaceuticals and other emerging contaminants every five years. This frequency is not enough to adequately determine the presence of these pollutants and capture variability. Instead, these contaminants should be monitored every year in the effluent. Less frequent monitoring is needed for groundwater unless emerging contaminants are found in significant concentrations in the

effluent. This is consistent with the proposed water recycling policy from the multi-stakeholder negotiation group.

The MRP includes a statement that the discharger must submit a map that "clearly identifies the locations of all monitoring wells, and production wells." (MRP at T-2). However, there is no mention of groundwater monitoring requirements in the MRP. Regular monitoring of groundwater should take place to determine if water quality has been compromised due to water recycling discharge. We recommend quarterly monitoring of groundwater for nutrients and salts, especially given that the recycled water limitation for total nitrogen is high at 10 mg/L. Of note, this is also consistent with the draft Water Reuse Policy mentioned above.

Antidegradation

Although the reuse of water for irrigation purposes has benefits for water supply security, such practices may degrade the quality of groundwater supplies. What provisions will be made to assure that there is no degradation of groundwater resources, as is required in State Water Board Resolution No. 68-16? Activities involving the disposal of waste that could impact high quality waters must implement best practicable treatment or control of the discharge necessary to ensure that degradation will not occur.

Again, we commend the City of Oxnard for developing a project to recycle water in order to secure reliable water supply amidst California's ongoing water crisis. However, we feel that the items discussed above must be addressed. If you have any questions or would like to discuss any of these comments, please feel free to contact us at (310) 451-1500.

Sincerely,

W. Susie Santilena
Water Quality Scientist

Kirsten James
Water Quality Director