



**MARK NORRIS**  
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August 25, 2008

CERTIFIED MAIL  
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Ms. Tracy Egoscue, Executive Officer  
Regional Water Quality Control Board – Los Angeles  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

**TENTATIVE WATER RECYCLING AND WASTE DISCHARGE  
REQUIREMENTS FOR GROUNDWATER RECOVERY ENHANCEMENT AND  
TREATMENT PROGRAM – NON-POTABLE REUSE PHASE 1 (File No. 08-070)**

Dear Ms. Egoscue:

Thank you for the opportunity to comment on the tentative Water Recycling and Waste Discharge Requirements (WDR/WRR) for the City of Oxnard's Groundwater Recovery Enhancement and Treatment Program (GREAT) – Non-Potable Reuse Phase 1. As you know, the GREAT Program is important to beneficially reusing our water resources while protecting and enhancing our groundwater in the Oxnard Plain. While the tentative WDR/WRR appear to allow us to move forward with our Project, we look forward to meeting with staff regarding the tentative requirements prior to the October board meeting to seek clarification on some of the requirements.

The only comment that we would like to bring out at this time is regarding section II.3, *Recycled Water Limitations*. This section requires that, by "March 31, 2009, the City shall send the report to the Regional Board and the CDPH that demonstrates equivalency of UV/AOX disinfection to chlorine disinfection as used in recycled water treatment plants." We are currently pilot-testing the membrane filtration and reverse osmosis treatment trains for the Advanced Water Purification Facility (AWPF), but have not yet scheduled testing of the ultra-violet and advanced oxidation treatment systems. It is unclear at this time when the report required under section II.3 could be submitted, but we would be unable to meet the March 31, 2009, deadline.

If you have any questions regarding our comment on the draft recycling requirements, please feel free to call me at (805) 271-2205, or contact Mark Pumford, Technical Services Manager, at (805) 271-2220.

Sincerely,



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Mark S. Norris  
Assistant Public Works Director

- c: Blythe Ponek-Bacharowski, Regional Water Quality Control Board – Los Angeles
- Don Tsai, Regional Water Quality Control Board – Los Angeles
- Jeff Stone, California Department of Public Health – Recycled Water Unit