

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT (Melissa Gunter)
MEETING DATE: September 13, 2017

ITEM: 6C

SUBJECT: **City and County of San Francisco** – Adoption of Water Reclamation Requirements for the Non-Potable Water Program

CHRONOLOGY: The Board has not considered this item before.

DISCUSSION: The City's Non-Potable Water Program (Program) would provide a permitting process for allowing new commercial, multi-family, and mixed-use developments in San Francisco to collect, treat, and reuse water for toilet flushing, irrigation, and other non-potable uses. The Program's goals include reducing potable water use for non-potable applications, diversifying the City's water supply portfolio, and developing local oversight and management over the implementation of onsite non-potable water systems. The Program supports water conservation and the expansion of local water supplies in response to droughts and the effects of climate change. Furthermore, it promotes green building practices while protecting public health.

The Program allows alternate water sources, such as rainwater, stormwater, graywater, blackwater, and foundation drainage, to be used in an onsite non-potable water system. The Program requires various levels of treatment, monitoring requirements, and water quality limitations for the different alternative water sources. The trigger for the Board requiring Water Reclamation Requirements for the Program is the inclusion of blackwater: the discharge of treated blackwater, which contains bodily or other biological wastes, to land requires coverage under Water Reclamation Requirements or Waste Discharge Requirements issued by the State or Regional Water Boards.

The Revised Tentative Order (Appendix A) would serve as Water Reclamation Requirements authorizing the collection, treatment, and discharge of alternate water sources by producers and users of onsite non-potable water throughout the City and County of San Francisco. The Program and the Revised Tentative Order:

- a. Create a streamlined permitting approach for the beneficial reuse and discharge of the alternate water sources; and
- b. Provide regulatory coverage of the discharge to land of the alternate water sources permitted under the Program.

The Revised Tentative Order's purpose is to ensure that discharges of alternate water sources to land by entities enrolled in the Program do not cause impacts to beneficial uses or threats to human health or the environment.

Comments from the State Water Board and Staff Responses

A tentative order was circulated for a 30-day public comment period ending on June 17, 2017. We received one comment email from the State Water Board's Division of Drinking Water. The comments addressed effluent water quality limitations for onsite non-potable water treatment systems that treat blackwater. The limitations were for ultraviolet light when used for disinfection and turbidity. We revised the tentative order in response to the comments provided by the Division of Drinking Water as described in Appendix B.

Water Code section 13523 also requires that the Water Board consult with the Division of Drinking Water when reviewing recycled water programs such as the Program. As a part of that consultation, we made minor changes to the tentative order as described in the Response to Comments (Appendix B). These were related to improvements suggested by the Division of Drinking Water and made by the City in its Engineering Report for the Program, and they reflect the City's submittal of an updated Engineering Report with the requested changes. The changes included clarifying that certain treatment credits could be provided once the treatment approach had been accepted by the Division of Drinking Water and that systems must have alarms and auto-dialers to notify the operator in the event of a system alarm. In its letter of August 24, 2017 (Appendix C), the Division of Drinking Water formally accepted the City's updated Engineering Report.

**RECOMMEN-
DATION:**

Adoption of the Revised Tentative Order

APPENDICES:

- A. Revised Tentative Order
- B. Response to Comments
- C. Division of Drinking Water: Non-Potable Water Program Engineering Report letter of acceptance