



CVCWA
Central Valley Clean Water Association
Representing Over Fifty Wastewater Agencies



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February 22, 2016

Via Electronic Mail Only

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814
commentletters@waterboards.ca.gov

Re: Draft Water Reclamation Requirements for Recycled Water Use

Dear Ms. Townsend:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the Draft Water Reclamation Requirements for Recycled Water Use (Draft WRRs). CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law. In this letter, we provide brief comments regarding the need to provide further flexibility in the Monitoring and Reporting Program.

As a preliminary matter, CVCWA appreciates the State Water Resources Control Board's (State Water Board) continuing efforts to support the use of recycled water, and to streamline the permitting of such applications. CVCWA supports the adoption of Water Reclamation Requirements to further promote recycled water use.

CVCWA's comments here pertain to two specific monitoring requirements: priority pollutant monitoring and disinfection system monitoring. Although the requirements in the draft WRRs mirror those adopted in Order WQ 2014-0090-DWQ, based on CVCWA's experience, the cost of the monitoring for this program is currently acting as an impediment. To streamline monitoring and decrease costs, CVCWA recommends that the priority pollutant monitoring either be deleted, or the frequency for which such monitoring is required be decreased. Specifically, the Draft WRRs would require annual priority pollutant monitoring for treatment systems that have a flow rate that equals or exceeds 1 million gallons per day (mgd), and once every five (5) years for systems that are less than 1 mgd. While the 5-year requirement helps very small systems from conducting such monitoring annually, annual monitoring still applies to many small systems that barely exceed the 1 mgd threshold. Priority pollutant monitoring is expensive, and annual monitoring is not necessary. To avoid this expensive and unnecessary cost, CVCWA recommends that annually monitoring for all systems be removed. Rather, priority pollutant monitoring should only be required once, at the time that the Notice of Intent is submitted. Or, in the alternative, all priority pollutant monitoring should be required only once every 5 years. This will help to greatly decrease annual monitoring costs.

With respect to disinfection system monitoring, CVCWA recommends that the Colilert method for making a finding of presence/absence of coliform be allowed, and that the traditional most probable number (MPN) testing method, which takes a count of MPN over three days, only be required if there is a presence of coliform. This would greatly streamline coliform testing, while still protecting public health.

We appreciate your consideration of these comments. If you have any questions or if CVCWA can be of further assistance, please contact me at (530) 268-1338 or eofficer@cvcwa.org.

Sincerely,



Debbie Webster,
Executive Officer