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February 22, 2016

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Comment Letter – General Order for Recycled Water Use.

Dear Ms. Jeanine Townsend:

Eastern Municipal Water District (EMWD) has reviewed and appreciates the opportunity to comment on the "Draft Water Reclamation Requirement for Recycled Water Use" (Draft General Order) coming before the State Water Resources Control Board (Board) on April 19, 2016. EMWD understands the Board's effort to streamline the permitting of recycled water uses that are a relatively low threat to water quality through the Draft General Order. However, EMWD is concerned with certain language within the Draft General Order and would recommend the following changes:

- Finding No. 34, the permittee's enrollment option, be replaced with the existing language found in the 2014 General Order Finding No. 29.
- Finding No. 36, clarification of Recycled Water User as signator on the NOI.

EMWD provides potable water and water reclamation services to 755,000 people in a service area of 542 square miles in Southern California. EMWD is one of the largest distributors of recycled water in California. In the past three years 100% of the recycled water or about 45 million gallons per day has been beneficially reused. The recycled water uses include agricultural crops, recreational, golf courses, parks, schools, landscaping, and industrial facilities. The recycled water represents about about thirty-percent of EMWD's water portfolio. It has been an essential part of EMWD's water sustainability program by providing a drought-resistant water source under the current drought conditions. EMWD's recycled water program is permitted through individual water reclamation permits issued by both the Santa Ana and San Diego Regional Water Quality Control Boards

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(Regional Boards). EMWD has worked closely with the Regional Boards to ensure that the salt and nutrient management plans protect the groundwater basins. These permits are specific to EMWD's recycled water program and has been instrumental in the success of our program. EMWD prefers to continue to operate under our individual permits instead of the General Order. The Draft General Order may remove the ability for EMWD retain its current permits.

Therefore, EMWD submits the following recommendations:

Permittee's Enrollment Option

EMWD prefers to be covered by the individual permits already in place. The individual permits have been developed for EMWD's recycled water program through a collaborative effort with our Regional Boards and the permit fits our specific needs while ensuring groundwater quality and public health protection. There would be no advantage or benefit to the Regional Boards or EMWD to change our existing permits and be covered by the Draft General Order. In fact, it produces an unnecessary burden requiring additional notification, monitoring and reporting. Therefore agencies with successful programs should have the ability to continue their current practices. EMWD believes that these local working relationships are better equipped to administer the established recycled water programs. EMWD is accepting of retaining the option to seek coverage as written under the current General Order, Order WQ 2014-0090-DWQ, which states:

"Producers, Distributors, or Users of recycled water covered under existing orders (water recycling requirements, master reclamation permits, general or individual waste discharge requirements, or waivers of waste discharge requirements) for the use of recycled water may elect to either: (i) continue or expand coverage under existing orders or; (ii) apply for coverage under this General Order."

Therefore, EMWD recommends that Finding No. 34 of the Draft General Order be replaced with the existing language as stated above.

Clarification of User NOI Signature

Clarification is needed for the language in Finding No. 36, that seems to require the signature of the recycled water users on the NOI. EMWD would like to clarify that it is not intended for every recycled water customer to sign the NOI. This would be burdensome and unnecessary.

EMWD appreciates the consideration of our comments on the Draft General Order. If you have any question, please feel free to contact me at (951) 928-3777 extension 6241.

Sincerely,



Jayne E. Joy, P.E.
Director of Environmental and Regulatory Compliance