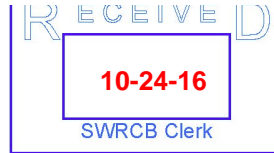




Long Beach Water

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October 20, 2016



Christopher J. Garner  
General Manager

Sent via email:  
commentletters@waterboards.ca.gov

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

RE: Comments on the Direct Potable Reuse Draft Report to the Legislature

Dear Ms. Townsend,

The City of Long Beach Water Department (LBWD) appreciates the opportunity to provide comments to the State Water Resources Control Board (SWRCB) on the Draft Report titled, "Investigating the Feasibility of Developing Uniform Water Recycling Criteria for Direct Potable Reuse (DPR)" (hereafter referred to as the Feasibility Study). LBWD supports SWRCB's finding that developing recycling criteria is feasible and offers the following comments on the draft Feasibility Study. LBWD's comments are intended to help clarify and assist the SWRCB in the development of practical DPR regulatory criteria that can move DPR forward while remaining fully protective of public health.

#### Comments:

**1. Flange to Flange DPR projects should be clearly decoupled and handled separately from raw water augmentation DPR projects.** While LBWD agrees with the SWRCB on the three possible types of DPR projects, we believe that direct delivery into a treated water distribution (often referred to as flange to flange DPR), possesses significantly higher levels of risk when compared with the other two types of DPR projects, which can be categorized as raw water augmentation DPR projects. California should first gain operational experience with raw water augmentation DPR projects prior to adopting uniform water recycling criteria for flange to flange DPR. Further, clear terminology for these two very distinct forms of reuse would be beneficial to the water industry's and public's understanding of the potable reuse options and varying risk profiles. While flange to flange DPR appears premature for uniform water recycling criteria at this time, a case-by-case approach to permitting such a project may be viable. In fact, permitting and operating a "one-off" or pilot project may allow a much clearer pathway to regulatory acceptance than first attempting to more broadly construct uniform criteria.

**2. Knowledge gap research should be completed prior to final adoption of DPR regulatory criteria.** LBWD understands that there are multiple research efforts underway designed to provide important and much needed data on how to successfully implement DPR in California and nationwide (e.g., WasteReuse Research Foundation's



DPR Initiative). While LBWD supports moving forward with planned research in parallel with regulatory criteria development, LBWD recommends that the six research topics identified by the Expert Panel<sup>1</sup> be completed before the SWRCB adopts uniform DPR water recycling criteria. The completion of these six research areas will provide a higher level of certainty that the adopted DPR regulatory criteria will protect public health.

**3. A “one-water” concept which enhances source control and optimizes wastewater treatment is a key element in the development of DPR regulatory criteria that are reliable, cost-effective and fully protective of public health.** Operational experiences with Indirect Potable Reuse (IPR) projects throughout California have demonstrated the benefit of optimizing wastewater treatment plant operation and rigorous source control programs on improving advanced water treatment unit process operations and final water quality. LBWD supports the inclusion of both wastewater treatment plant operation and source control provisions within the overall DPR regulatory criteria. By including these concepts directly into uniform DPR water recycling criteria, the SWRCB reinforces the “one-water” concept whereby the distinction between wastewater effluent and the potential source for potable water is minimized and goals of the Clean Water Act and Safe Drinking Water Act can be sensibly merged for DPR regulation. This ultimately will promote reliable operations that fully safeguard public health.

**4. Inclusion of clearer and more quantifiable success metrics and milestones in the Feasibility Study’s Implementation Plan.** The draft Feasibility Study’s Implementation Plan found in Chapter 5 summarizes a series of recommendations, incorporating those provided by the Expert Panel and Advisory Group. LBWD recommends that the SWRCB provide more specific metrics and milestones in the Implementation Plan that includes a roadmap with at least general time frames to provide clearer understanding of the regulatory process moving forward in developing uniform DPR criteria. LBWD understands that establishing firm deadlines for meeting each recommendation may be premature at this time; however, a more detailed and specific discussion associated with each of the recommendations is warranted. The Implementation Plan must clearly lay out the proposed path forward for bridging the necessary research and knowledge gaps that would allow for the adoption of DPR regulatory criteria.

#### **Conclusion:**

LBWD thanks the SWRCB for the opportunity to comment on the draft DPR Feasibility Study. We believe that the additions and clarifications noted will result in a more robust and meaningful Feasibility Study with the ultimate goal of developing uniform DPR water recycling criteria for California.

If you have any questions regarding these comments, please feel free to contact Tai Tseng, director of operations, at [tai.tseng@lbwater.org](mailto:tai.tseng@lbwater.org) or (562) 570-2472.

Sincerely,

Christopher J. Garner

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<sup>1</sup> See Chapter 3 of the Feasibility Study and Appendix A-- Expert Panel Final Report: Evaluation of the Feasibility of Developing Uniform Water Recycling Criteria for Direct Potable Reuse.