



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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Public Comments
Report to the Legislature on DPR
Deadline: 10/25/16 12:00 noon

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Via Electronic Mail

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State Water Resources Control Board
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Comment Letter - Report to the Legislature on DPR

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to provide comments on the September 2016 draft report to the Legislature on the Investigation on the Feasibility of Developing Uniform Water Recycling Criteria for Direct Potable Reuse (DPR) (Draft Report). The Sanitation Districts are a confederation of 24 independent special districts that provide for the wastewater and solid waste management needs of approximately 5.5 million people in 78 cities and unincorporated areas of Los Angeles County, California. The Sanitation Districts own and operate 11 wastewater treatment facilities and currently treat over 400 million gallons per day (MGD) of wastewater. We produce over 140 MGD of recycled water, of which approximately 80-90 MGD is beneficially used at over 800 sites throughout Los Angeles County. We are partners on two existing indirect potable reuse (IPR) projects, with several more in development, and have been supplying recycled water for groundwater recharge since 1962.

The Sanitation Districts agree that recycled water is a valuable resource that should be further developed, particularly in light of drought and climate change concerns. The Sanitation Districts therefore support the finding that it is feasible to develop DPR statewide regulations. We also support the State Water Resources Control Board's (State Board's) efforts to develop DPR regulations and believe it would be beneficial to have a clear path forward. For these reasons we support the comments submitted by WaterReuse California and the California Association of Sanitation Agencies (CASA) on the Draft Report, and respectfully submit the additional comments below.

Table 1: Implementation Plan – Research and Knowledge Gaps

Recommendation 2 – Blue Ribbon Panel on CECs

As part of the 5-year reviews of constituents of emerging concern (CEC) issues, the State Board should identify any contributors of chemical constituents of concern that should be addressed through state-level product controls, and, where appropriate, should propose legislation that can assist in addressing these chemical constituents of concern.

Recommendation 4 – Raw Water Pathogen Monitoring

The Expert Panel recommended that for development of the DPR criteria, raw water pathogen monitoring for wastewater used in DPR projects should be conducted as research. This research need was not intended for all potable reuse projects. However, the Draft Report does not seem to differentiate between the two. The Draft Report should specify that monitoring for pathogens in raw water should only be required in wastewater intended to be used for DPR.

Recommendation 5 – Pathogen Data Associated With Outbreaks

The State Board recommends that the feasibility of collecting pathogen data associated with outbreaks is to be investigated. Through these investigations, this may be determined to be infeasible. However, the metric for success is “determining a process for data collection” with the milestone being “monitor for community outbreaks of disease”, both of which assumes this will be found feasible. This metric and milestone should be revised in case the collection of pathogen data associated with outbreaks is determined to be infeasible.

Table 2: Implementation Plan – DPR Program Development

Recommendation 12 – Technical, Managerial & Financial Capacity

A technical, managerial, and financial capacity assessment process was recommended by the Advisory Panel only for DPR projects. This assessment process was not intended for all potable reuse projects. However, the Draft Report does not seem to differentiate between the two. The Draft Report should clarify that this assessment process will be established only for DPR projects.

General Report

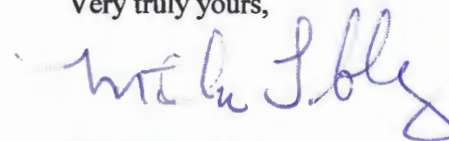
Chapter 3 – Feasibility of Developing Uniform Water Recycling Criteria for DPR

The second paragraph on page 18 states that, “The Expert Panel also concluded that “Although it is prudent to include reverse osmosis in the first set of DPR projects due to the water quality benefits and performance reliability that reverse osmosis provides, proposals for DPR projects that do not employ reverse osmosis could be considered and ultimately approved by the State Water Board.” Because of the critical importance of reverse osmosis (RO) to meeting performance requirements in IPR, it is not clear how to write criteria that allow alternatives to RO while assuring no reduction of the high degree of reliability necessary for DPR...”

RO, however, is not critical to meeting the performance requirements for IPR projects as indicated in the text. There is language already allowing consideration of alternative treatment trains in the IPR regulations. A similar format could be followed in the DPR regulations. Additionally, alternative unit processes could be compared and approved based upon microbial and water quality comparisons. For example, a technology that results in similar removal of biologically degradable total organic carbon (TOC) and CECs could be judged equivalent or if the process train met microbial removal targets and the desired level of redundancy, it could also be deemed an equivalent process to RO.

The Sanitation Districts would like to thank State Board staff for their efforts in putting this Draft Report together and for their leadership on this very important issue. DPR has the potential to provide new opportunities to maximize the use of wastewater and we look forward to its continued development. If you have any questions or need further information, please contact Monica Gasca at (562) 908-4288, extension 2838 or mgasca@lacsds.org.

Very truly yours,



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