



## CITY OF SIGNAL HILL



2175 Cherry Avenue ♦ Signal Hill, CA 90755-3799

May 2, 2015

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

Subject: Emergency Rule Making – Drought Emergency Water Conservation – Requested Exemption for Purified Medical Water

Dear Ms. Townsend:

The City of Signal Hill generally supports the Emergency Rulemaking for water conservation contained in the April 29, 2015 regulations. However, we are requesting clarification of the application of the water conservation rules to the production of purified medical water by a business in our small community. We believe that imposing a water conservation mandate on the production of purified medical water will create a public health issue. We also believe that attempting to redistribute the water conservation burden on a community of 11,411 residents for one specialized medical water use is unrealistic, especially based on the statewide reach of this business.

Signal Hill operates a small community water system. As small system in a larger urban area, we take our water conservation responsibilities very seriously. The City began in June of 2014 to implement water conservation programs and our consumers reduced water consumption by 11% over this time frame. However, as our water system transitions to an urban water system, the proposed regulation will be difficult to implement in our community.

Section 864 of the emergency regulation provides an exemption where necessary to address an immediate health and safety need or to comply with a term or condition in a permit issued by a state or federal agency. This exemption has not been clearly defined in the regulation. For example, Signal Hill's largest consumer of potable water, Evoqua Water Technologies, provides purified water for medical uses, including for the production of heart valves from pigs used in human transplants. A 25% reduction requirement imposed on this medical use has the potential to create at the very least a regional public health emergency. Evoqua is one of the few highly specialized companies in the entire State that produces purified medical water.

We have worked with Evoqua in order to determine if they can rely on reclaimed water. However, after testing the quality of the local reclaimed water, they will not be able to meet State permitted purity requirements for medical uses due to the presence of small

amounts of fecal materials even after purification. Also, Evoqua has installed a recycled water system and makes efficient use of the potable water in their purification process. In order to give you a sense of their consumption as compared to our overall small water system, Evoqua relies on approximately 45.1 million gallons of water annually. The City is the next largest water user, at 17.8 million gallons and the Long Beach Unified School District is third largest user at 8.2 million.

The State has indicated that other consumers in our system should make up the difference, if the City determines that a particular user cannot realistically conserve water. However, this would add an additional 1.5% reduction requirement to all of Signal Hill's water consumers. Signal Hill residents and businesses are in essence being asked to conserve water for a business that services the entire State of California and for which few viable alternatives exist.

Most of the water use for the City and school district is in landscape irrigation, where we can reasonably conserve water. However, Evoqua Water Technologies has no viable options. We believe that the emergency exemption for public health and safety should be applied to producers of purified medical water. The State is extending an exemption to agriculture, since the State does not want to create food shortages and spikes in food prices. We believe this same rationale applies to purified medical water, where critical medical water shortages and price spikes for heart valves are certainly on par with the needs of California's farmers.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Forester". The signature is stylized and includes a small "For" at the end.

Larry Forester  
Mayor

cc: Senator Ricardo Lara  
Assembly Member Patrick O'Donnell  
City Council  
Evoqua Water Technologies



May 2, 2015

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

**Re: Emergency Rule Making – Drought Emergency Water Conservation – Purified Medical Water**

Dear Ms. Townsend:

EVOQUA Water Technologies specializes in providing highly purified water and water purification systems. Our purified water is used in the production of pharmaceuticals and in the manufacture of medical devices. EVOQUA generally supports the Emergency Rulemaking for water conservation contained in the April 29, 2015 regulations. However, we are requesting that an exemption of the water conservation rules be given to the production of purified water used for medical purposes.

EVOQUA is one of the few water purification companies in California that can meet the stringent water quality standards required by pharmaceutical and medical device companies. One of EVOQUA's clients is a manufacturer of pig heart valves that are transplanted into humans. EVOQUA recognizes that our business is water intensive and has analyzed the potential of using recycled water. However, tertiary treated recycled water contains the presence of fecal coliform. The presence of this constituent will not meet the strict source water characteristics demanded by our clients.

The water we produce is necessary in the manufacture of life saving medical products that are relied upon by those with medical needs. Any mandatory water reduction placed on EVOQUA or similar companies is likely to impact the ability to provide the highly purified water needed by pharmaceutical and medical device companies throughout the state and create a public health issue. We believe it is in the best interest of public health that an exemption be given to the production of water purification used for medical purposes.

Thank you for your consideration,

Dave Stewart  
Signal Hill Plant Manager

EVOQUA Water Technologies