Public Comment
Recycled Water Policy
Deadline: 7/3/12 by 12 noon

ALAMEDA COUNTY WATER DISTRICT

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SWRCB Clerk

July 2, 2012

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

Dear Ms. Townsend:

Subject: Comments on Proposed Amendment to the Recycled Water Policy

The Alameda County Water District (ACWD) thanks the State Water Resources Control Board (State Board) for this opportunity to comment on the proposed amendment to the Recycled Water Policy to include monitoring for constituents of emerging concern (CECs).

ACWD manages the Niles Cone Groundwater Basin and distributes potable water to a population of over 328,000 in the cities of Fremont, Newark, and Union City, California. In typical years, groundwater constitutes 40% of our supply to the distribution system. We recognize the potential benefits of recycled water, and applaud the State Board's efforts through the Recycled Water Policy to promote recycled water to conserve potable water supplies. We appreciate your consideration of the following comments, which we believe are consistent with the objective of maximizing recycled water use within California without adversely impacting potable groundwater supplies.

1. Attachment A, Page 4, Table 1; Page 6, Item 2.1.3; and Page 10, Table 3. ACWD requests that the State Board consider monitoring requirements and maximum limits for NDMA and 1,4-Dioxane in recycled water used for landscape irrigation projects. We understand the State Board's expert panel did not perceive a significant health risk related to these or other CECs in recycled water used for landscape irrigation. However, since the issuance of the expert panel's report in 2010, a Santa Clara Valley Water District study (Locus Technologies, 2011) identified NDMA impacts to groundwater attributable to a landscape irrigation project. 1,4-Dioxane is another chemical that may be highly mobile and recalcitrant in the subsurface. The United States Environmental Protection Agency has released Unregulated Contaminant Monitoring Rule 3 (UCMR3) requirements, which call for monitoring 1,4-Dioxane at levels as low as 0.07 parts per billion (ppb). This level is considerably lower than both the 3 ppb notification level and wastewater concentrations that had previously been considered by the expert panel.

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2. ACWD requests that the funding provision in Item 11 (Page 14) of the main body of the Recycled Water Policy be amended so that agencies can be eligible through 2014 or later for the purpose of developing salt and nutrient management plans. In addition, it is requested that the State Board consider making funds available for agencies tasked per Item 6.b.(3)(a) of the Recycled Water Policy to monitor for recycled water constituents identified in their respective salt and nutrient management plans.

3. ACWD requests the State Board add language in Attachment A of the Recycled Water Policy to ensure that agencies performing local groundwater management, protection, or replenishment, will receive copies of monitoring data generated from recycled water projects, including landscape irrigation projects. This provision would not apply in the case where such agency is the owner or operator of the recycled water project.

ACWD appreciates the State Board's consideration of these comments. Questions on the content of this letter may be directed to Mike Halliwell at 510-668-4412.

Sincerely,

Robert Shaver
Assistant General Manager-Engineering

Reference
Locus Technologies, 2011. Recycled Water Irrigation and Groundwater Study. August 2011. Prepared for the Santa Clara Valley Water District, San Jose, Calif. Locus Technologies, Mountain View, Calif.

mh/tf
cc: Steven Inn, ACWD