

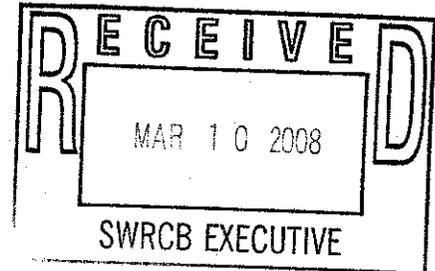


PUBLIC WORKS
DEPARTMENT

CITY OF BURBANK
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March 10, 2008

Ms. Jeanine Townsend
Acting Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814



Subject: Comment Letter - Proposed Recycled Water Policy

Dear Chair Doduc and Members of the Board:

The City of Burbank Public Works Department (Burbank) appreciates the opportunity to provide comments on the State Water Resources Control Board's (State Board) Revised Proposed Recycled Water Policy, and commend the State Board for their effort to develop a uniform statewide water recycling policy. We applaud the State Board for its leadership in undertaking this policy and offer our comments in the spirit of assisting the Board in achieving its goals to facilitate recycled water use and improve consistency in the permitting process.

1. Unreasonable expectation of a total nitrogen concentration of three mg/L.

While Burbank is generally supportive a proposed policy, we are concerned with the expectation of a total nitrogen (TN) concentration of three mg/L in recycled water. The Proposed Recycled Water Policy requires that all irrigation projects supplied by recycled water with a total nitrogen concentration greater than three mg/L to develop and implement nutrient management practices. The draft staff report seems to indicate that a concentration of three mg/L can be achieved through nitrification/de-nitrification facilities at water reclamation plants. Our experience at the Burbank Water Reclamation Plant reveals that although many nitrification/de-nitrification facilities can successfully reduce the total nitrogen levels to less than 10 mg/L on an annual average, but cannot be relied upon to achieve levels less than 5 mg/L.

2. Uncertainty of recycled water limits based on toxicity objectives.

The Proposed Recycled Water Policy allows the Regional Water Quality Control Boards to establish recycled water limits based on narrative toxicity objectives, which may be more stringent than drinking water standards, without a basis in science. This introduces the likelihood of differing recycled water limits throughout the State and undermining the purpose of this policy. Furthermore, the uncertainty created by concentration limits

based on a narrative toxicity objective (without any defined numeric translators) undermines the City of Burbank's ability to plan for projects.

Burbank thanks the State Board in advance for considering its comments. If you have any questions regarding Burbank's comments, please contact me at (818) 238-3931.

Sincerely,

A handwritten signature in black ink, appearing to read "Rodney Andersen", with a long horizontal flourish extending to the right.

Rodney Andersen
Assistant Public Works Director – Wastewater Systems