



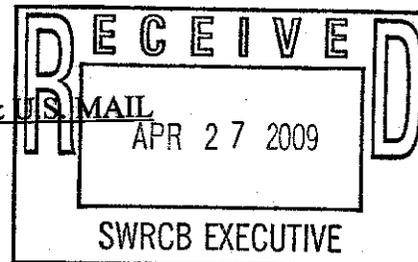
Delta Diablo Sanitation District

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April 27, 2009

VIA ELECTRONIC MAIL (commentletters@waterboards.ca.us) & U.S. MAIL

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



SUBJECT: COMMENT LETTER – LANDSCAPE IRRIGATION GENERAL PERMIT

Dear Chair Doduc & Members of the Board:

Thank you for the opportunity to comment on the State Water Resource Control Board's (State Water Board) Proposed Statewide General Permit for Landscape Irrigation Uses of Recycled Water (General Permit). As the State Water Board declared in the recently adopted Recycled Water Policy (Policy), expanding the use of recycled water is becoming increasingly important to California's future sustainable water supply and economy. The District fully supports the State Water Board in its efforts to increase and encourage the use of recycled water as required under AB 1481 (De La Torre).

Delta Diablo Sanitation District serves a population of over 181,000 residents in a service area of approximately 52 square miles in Contra Costa County. The District is permitted as a secondary wastewater treatment facility at 16.5 million gallons per day (MGD) and also operates one of the largest industrial water recycling facilities in northern California. This Recycled Water Facility (RWF), rated for 12.8 MGD is adjacent to and taps off of the main wastewater treatment plant. The District operates its recycled water program under the San Francisco Bay Regional Water Quality Control Board's (Regional Water Board) General Water Reuse Requirements for Municipal Wastewater and Water Agencies Order 96-011.

The District supports the overall structure of the proposed General Permit's operative provisions (compliance with Title 22 of the California Code of Regulations (Title 22), the four best management practices (BMPs) specified in the Policy, and an operation and management plan (O&M Plan)) and believe the provisions to be consistent with the intent of the Policy. However, we believe that a number of the findings and prohibitions undermine the purpose of the General Permit.

These findings and prohibitions characterize recycled water as a waste rather than a valuable resource. This is inconsistent with the Policy as well as the Water Code. Water Code section 13050(n) defines "recycled water" as "water which, as a result of treatment of waste, is suitable for a direct beneficial use or a controlled use that would not otherwise occur and is therefore considered a valuable resource." Many of these findings and prohibitions create the impression that recycled water is a water quality threat and would only add to the barriers currently facing the use of recycled water for landscape irrigation.

Chair Doduc & Members of the Board

April 27, 2009

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As the General Permit is currently written, the District would not seek coverage under this permit because we believe the provisions would discourage customers from using recycled water and would unnecessarily increase the staffing and overhead costs associated with our recycled water program. The monitoring and reporting requirements alone would require the installation of multiple meters on our existing system and increased staff to read meters daily and collect the additional required information such as rainfall and potable water usage.

The extra reporting requirements for the irrigation customers would also create disincentives for General Permit coverage. For example, Provision No. 5.C requires multiple levels of documentation for each user site for submittal to the Regional Water Board before a project may begin. These levels include an operations plan, general irrigation management plan, individualized irrigation management plan, and an approved Title 22 engineering report. Additionally, the General Permit's requirements in the monitoring and reporting program to monitor daily, conduct weekly site investigations and prepare an annual report for each use area would further push irrigators to use potable and other water sources over recycled water.

The District has managed a successful recycled water program under the Regional Water Board's Order 96-011 since 2001. Order 96-011 encourages the use of recycled water, is adequately protective of water quality, and offers producers and distributors the flexibility to practically and effectively manage recycled water at the local level. The District encourages the State Water Board to consider modeling the General Permit after Order 96-011 to increase the use of recycled water for irrigation.

We are aware that the Association of California Water Agencies, the California Association of Sanitation Agencies, and the WaterReuse Association (the Associations) have submitted comments on the General Permit and the District supports and includes by reference the Associations' comment letter. The District urges the State Water Board to consider the Associations' suggested revisions to the General Permit to provide greater clarity, increase the practicality of implementation, and conserve the limited resources of water recyclers, their customers, and the Water Boards.

Thank you for the opportunity to provide our comments on the proposed General Permit.

Sincerely,



Gary W. Darling
General Manager

AWR:awr

Attachment

cc: CORP.15.03-CORRES-
Chron File