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Coachella Valley Water District

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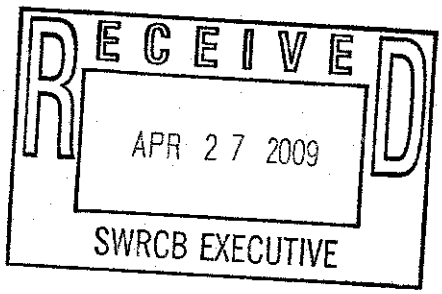
April 27, 2009

File: 0022.
Recycled
Water

Tam Dudoc, Chair, and Members
Attention: Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Dear Chair Dudoc and Members of the Board:

Subject: Comment Letter - Landscape Irrigation General Permit

The Coachella Valley Water District (CVWD) appreciates the opportunity to comment on the draft subject general permit for landscape irrigation uses of municipal recycled water. CVWD provides domestic water, wastewater, recycled water, irrigation/drainage and regional stormwater protection services to a population of 265,000 throughout the Coachella Valley in Southern California. CVWD has also taken a lead role in groundwater management in the Coachella Valley by importing surface water for groundwater replenishment, encouraging water conservation and developing in-lieu groundwater recharge projects that depend on alternative non-potable water supplies that include recycled water.

We understand State Water Board staff has prepared this draft permit to comply with AB 1481, which was adopted to encourage recycled water use by stream-lining the regulatory process and removing the regulatory uncertainty that currently exists for recycled water projects in some regions of the State. This was also the goal of the Recycled Water Policy recently adopted by your agency. The draft permit as written will not achieve this goal, will discourage recycled water use throughout the state and, if required locally, will prohibit recycled use at over 90 percent of the sites currently receiving recycled water in the Colorado River Basin region.

CVWD has recently invested approximately $30 million into a project to maximize recycled water use in a large portion of the Coachella Valley. When complete, this $70 million project will deliver nonpotable surface water and recycled water to approximately 50 golf courses and represents a critical element for a groundwater management plan designed to provide a sustainable water supply for the Coachella Valley. The draft permit as written represents a serious threat to the success of this project and the long-term water supply for the Coachella Valley.

Your consideration of the enclosed comments on the subject permit is appreciated. These comments identify a number of significant problems with the subject permit. We believe the changes needed in this draft permit justify the decision to prepare a new draft permit for public comment prior to State Water Board consideration.

We look forward to working with State Water Board staff to improve this general permit so that it can be used to encourage recycled water use in areas where ineffective regulatory programs have stalled new recycled water projects. We also hope our enclosed comments help State Water Board staff avoid developing a general permit that has the unintended consequence of discouraging recycled projects in areas that already have successful regulatory programs governing the use of recycled water.

If you have any questions or would like to discuss some of these comments, please call Steve Bigley, Environmental Services Manager, extension 2286.

Yours very truly,

Mark L. Johnson
Director of Engineering

Enclosure/1/as

cc: Dave Bolland (with enclosure)
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SB:md\eng\wr\09\apr\dudoc-state water rcb

Coachella Valley Water District Comments
Draft General Waste Discharge Requirements For
Landscape Irrigation Uses of Municipal Recycled Water (General Permit)
April 27, 2009

1. Findings, general comment. The findings as written are designed to characterize recycled water as a waste product as opposed to a beneficial resource as prescribed in the Recycled Water Policy. The correct characterization of recycled water is an important driver to achieve the objective of AB 1481 to encourage recycled water use. Much consideration was given to this goal when the Recycled Water Policy was drafted and this effort has been shadowed by many of the findings contained in the draft permit. Rather than including a new set of findings in the subject permit that fail to convey the same message as that found in the Recycled Water Policy, the subject permit should be revised to reference the Recycled Water Policy findings that already exist.

2. Finding 2. This finding should provide additional clarity in regards to how this general permit will be implemented to achieve the objective of AB 1481. This finding should state that this general permit is provided as an option available to Producers and Distributors that choose to apply for this permit to improve the regulatory process in their area. This finding should also state that this general permit is not intended to replace existing general waste discharge requirements (general permits) or master reclamation permits already used by Regional Water Boards to regulate Producers, Distributors or Users of recycled water. This request is consistent with the discussion provided on page 41 of the CEQA analyses for the subject permit. In the Colorado River Basin, Order No. 97-700 is an example of a general permit process that has encouraged the safe and beneficial use of recycled water for landscape areas and golf courses within this region for over 10 years. It is important that your office does not adopt a general permit that forces Regional Water Boards to make changes to existing regulatory programs that successfully govern recycled water use. Revising this finding to provide this clarification provides guidance that some Regional Water Boards may need to understand that the general permit is an alternative that Producers, Distributors and Users can apply for voluntarily.

3. Finding 4. Paragraph (d) of this finding would require Producers and Distributors comply with all applicable requirements of the Recycled Water Policy in order to obtain coverage under the subject permit. The Recycled Water Policy consists of a set of guidelines for developing the requirements needed to encourage recycled water use in a safe manner. The Policy lacks the specificity for Producers and Distributors to determine applicable requirements that must be met. This statement is too vague and should be removed from the subject permit.

4. Finding 5. This finding should be replaced with a finding that incorporates the findings contained in the Recycled Water Policy.

5. Finding 8. As stated in comment 2 above, it is important that the draft permit represent one option available to govern landscape irrigation uses of recycled water. Please add the following clarifying statement to the end of this finding, "Producers or Distributors covered by a master reclamation permit or are delivering recycled water to recycled water users covered by a general permit are not required to obtain coverage under this General Permit."

6. Findings 11, 12 and 13. Finding 4 already references the appropriate sections of Title 22. Findings 11, 12 and 13 should be deleted.

7. Findings 14-27. These findings are all elements that are better addressed in the Recycled Water Policy and should be replaced with a reference to this policy.

8. Finding 28. The last sentence states that in regards to impoundments, "In some cases, various chemicals (e.g., copper sulfate, acrolein, etc.) may be added to impoundments for weed, algae, and vector control." This sentence does not relate to "unauthorized discharges of recycled water" as the section is titled. These chemicals would be used for lake management regardless if recycled water is used for irrigation or if groundwater is used for irrigation. Please remove this sentence as it implies that these chemicals are directly related to the presence of recycled water in an impoundment.

9. Finding 46. This finding states that, "To comply with this General Permit, Producers, Distributors, must implement the following treatment and control measures necessary to avoid pollution or nuisance and maintain the highest water quality consistent with the maximum benefit to the people of the state:... b. Apply recycled water at agronomic rates; c. Identify and implement best management practices; d. Develop, maintain and implement an Operation & Maintenance Plan; and e. Employ trained personnel (e.g., recycled water supervisor)." These requirements should be required of the recycled water User rather than the Producer or Distributor. Producers and Distributors do not have the authority to force land owners to implement these control measures and therefore would be unable to ensure compliance with this finding or the draft permit. Condition a. "Implement treatment and use standards necessary to produce disinfected tertiary recycled water and implement the applicable Title 22 Requirements;" is the appropriate treatment and control measures to associate with a recycled water Producer or Distributor. Conditions b, c, d and e should be deleted from this finding.

10. Prohibition 3. This prohibition states that, "The use of recycled water, pursuant to this General Permit, for property zoned as "single family residential" is prohibited." This prohibition would have the unintended consequence of excluding golf course and common area landscaping projects that meet the criteria in Finding 3 of the subject permit. Most of the Use Areas receiving recycled water in the Colorado River Basin region are golf courses or irrigated common areas within homeowners associations on parcels that have some form of single family residential zoning. The most common zoning that local Cities apply to parcels consisting of golf courses

within the Coachella Valley is "Residential Planned Development." This prohibition also sends the message that recycled water is not safe for residential irrigation, which is clearly not true. Section 13552.2 of the California Water Code states that, "a) The Legislature hereby finds and declares that the use of potable domestic water for the irrigation of residential landscaping is a waste or an unreasonable use of water within the meaning of Section 2 of Article X of the California Constitution if recycled water, for this use, is available to the residents and meets the requirements set forth in Section 13550, as determined by the state board after notice and a hearing." Title 22 Article 4. Use area Requirements. 60310. Item (f) states that, "No spray irrigation of any recycled water, other than disinfected tertiary recycled water, shall take place within 100 feet of a residence or a place where public exposure could be similar to that of a park, playground, or a school yard." Both regulations confirm that it is appropriate to use recycled water that has been treated to disinfected tertiary standards for residential landscaping. Finding 3 of the subject permit already specifies that individually owned residences are not eligible for coverage under this general permit and that Regional Water Boards will address individually owned residences on a case-by-case basis. Therefore, Prohibition 3 is unnecessary and should be deleted from the subject permit to avoid sending the message that recycled water is not safe for residential landscape irrigation.

11. Prohibitions 4, 5 and 6. These prohibitions are intended to clarify what recycled water uses can be covered by this general permit. This is not the best use of a prohibition and tends to send a message that recycled water uses not covered by this permit are unacceptable. It would be better to replace these prohibitions with a finding that describes the permit's applicability.

12. Prohibition 8. This prohibition would prohibit recycled water use where there is evidence that Emerging Constituents/Chemicals of Emerging Concern (CECs) are a concern as determined by CDPH. This prohibition interjects exactly the type of regulatory uncertainty that AB 1481 was adopted to eliminate. The title given to "Chemicals of Emerging Concern" should point to the obvious problem with this prohibition. Just the mere fact that these chemicals are on the CEC list, makes them a concern to CDPH. As technology improves, it is likely that more and more CECs will be detected in recycled water. Even if detected in minute concentrations, these detections will automatically raise concerns because the science does not exist to determine the health risks associated with these emerging constituents. Because the technology to detect constituents will always outpace the science needed to understand health risks, it is almost certain that detected CECs will provide evidence to support prohibiting recycled water use based on this proposed prohibition. The Recycled Water Policy provides significant guidance on this issue which is not reflected in this prohibition. We recommend that this prohibition be deleted from the draft permit.

13. Prohibition 10. This prohibition states, "The direct or indirect discharge from use areas of recycled water to surface waters, either perennial or ephemeral, including wetlands, vernal pools, etc. is prohibited, unless otherwise authorized by an NPDES

permit." There was extensive discussion about the need to properly address small amounts of recycled water leaving the use area when the Recycled Water Policy was developed to acknowledge that some incidental runoff was unavoidable for most recycled water projects. Provision 16 of the draft permit allows minor amounts of recycled water to escape the use area when associated with BMPs for good irrigation practices. Prohibition 10 would act to override any allowance provided for incidental runoff and would require a NPDES permit for even small amounts of recycled water entering surface waters, which is broadly defined as perennial or ephemeral, including wetlands, vernal pools, etc. NPDES permits are not feasible options for discharges of recycled water into surface waters. There is no feasible method to prevent small amounts of spray, mist or runoff from leaving the use area and entering a surface water. This prohibition fails to acknowledge recycled water as a valuable resource that can be used safely even when small amounts of incidental runoff occurs. Since incidental runoff is already addressed by Provision 16 and there is no feasible way to comply with this prohibition, it is important that this prohibition be removed from the subject permit.

14. Prohibition 16. This prohibition would prevent the application of any material that violates the California Health and Safety Code section 25249.5. This prohibition includes the application of any amount of any chemical known to cause cancer or reproductive toxicity, when the chemical passes or will probably pass into drinking water sources. Based on this prohibition, any amount of any one of the trihalomethanes, which are formed during the disinfection of recycled water and drinking water to meet Title 22 requirements, found in recycled water would prohibit its' application when this chemical is likely to enter surface water or groundwater used as a drinking water source. Using "any amount" criteria for this prohibition would not only prohibit the application of recycled water but it would also prohibit the application of most disinfected drinking water supplies used for landscape irrigation where drinking water sources are adjacent to or immediately below the use area. Prohibition 15 already protects drinking water sources. Since it would be infeasible to ensure compliance with this prohibition at many recycled water projects, it is important that this prohibition be removed from the subject permit.

15. Specification 6. This specification states that, "Use areas that are spray irrigated and allow public access shall be irrigated during periods of minimal use (e.g. between 9 pm and 6 am). Consideration shall be given to allow maximum drying time prior to subsequent public use." This specification sends the message that contact with tertiary disinfected recycled water is unsafe. Title 22 allows full body contact with tertiary disinfected recycled water. Please revise this statement to read, "Use areas that are spray irrigated and allow public access shall be irrigated during periods of minimal use (e.g. between 9 pm and 6 am) unless the irrigator or on-site supervisor is present." Since full body contact is allowed with tertiary disinfected recycled water, there is no reason to ensure that the Use Area is completely dry prior to public use. It would also be infeasible for golf course staff to differentiate recycled water from precipitation or dew that occur naturally and is unavoidable.

16. Specification 14. States that, "Recycled water shall be managed to avoid contact with workers." Avoiding contact with recycled water is impossible for those working on the irrigation system. This specification should be revised to state, "Recycled water shall be managed to minimize contact with workers." Employees at a recycled water use site will receive training by the on-site supervisor to minimize contact with recycled water and to use proper hygienic practices.

17. Specification 15. This specification states, "At a minimum, the Producer and Distributor shall ensure that the User shall implement the required BMPs identified in Attachment C and consider implementing other BMPs as appropriate." Producers and Distributors do not have the land use authority to control the Users implementation of BMPs. In addition, this specification is incorrectly worded and would actually require that the Producer and Distributor consider implementing other BMPs as appropriate, which is clearly intended to be the User's responsibility. This provision should be revised to state, "The Producer and Distributor shall ensure the agreement identified in Provision 5(e) includes the requirement that the User implement the required BMPs identified in Attachment C and that the User consider implementing other BMPs as appropriate." This revision is consistent with specification 18 of the subject permit.

18. Provision 1(b). Paragraph (b) of this provision states that the "Distributors shall be responsible for the operation and maintenance of transport facilities and associated appurtenances necessary to convey and distribute the recycled water from the point of production to the point of use with all applicable Title 22 requirements." This statement is incomplete and the intent of this provision is not clear. This provision may be interpreted to require Distributors meet Title 22 water quality standards for tertiary disinfected recycled water from the point of production to the point of use. It is important to recognize that it would be inappropriate to apply Title 22 water quality standards at the point of use. Many recycled water irrigation systems are designed to utilize on-site impoundments (i.e., golf course water features) as reservoirs to receive recycled water from the Distributor and to pump out of when irrigating Use Areas. These impoundments are used by wildlife, including many bird species, and would not meet Title 22 turbidity and bacteriological standards. It would be cost prohibitive for Users to install facilities to repeat the filtration and disinfection process to meet Title 22 turbidity and bacteriological standards at each sprinkler head or irrigation emitter. Title 22 section 60301.230 states that, ""Disinfected tertiary recycled water" means a filtered and subsequently disinfected wastewater that meets the following criteria:... " and does not go on to say that this water must exit the point of use meeting these requirements only that it must be treated to meet these requirements. Please revise this provision to read "Producers shall be responsible for the treatment of recycled water to meet all applicable Title 22 requirements."

19. Provision 1 (c). Paragraph (c) of this provision states that, "The Producer and Distributor shall be responsible for the application and use of recycled water in the respective Use Areas and for associated operations and maintenance in accordance with all applicable Title 22 requirements and this General Permit. The Producer and

Distributor are also responsible for ensuring that Users maintain the minimum land application acreage and impoundment capacity to comply with the terms and conditions of this General Permit." This actually is the responsibility of those with Turfgrass and Landscape Management Degrees and field experience with Turfgrass and Landscape irrigation. They are a very responsible group of individuals that are capable of using a product as it is intended. For example, the fertilizer industry is not responsible for making sure that every golf course uses their fertilizer properly. The fertilizer industry provides the golf course with directions and labels for the proper use amounts and application methods and it is sold with confidence that when used properly the golf course will benefit from their product. The same should be true for the recycled water Producer and Distributor. Directions and Best Management Practices should be provided to the User to follow in this policy and in contracts and agreements between the Producer/Distributor and the User. As it is, the User will need to provide this information to the Producer/Distributor, who will then have to provide this information to the State Board. The User can provide this information directly to the State Board.

20. Provision 2. This provision states that, "The Producer and Distributor shall comply with Monitoring and Reporting Program No. 2009-XXXX-DWQ and revisions thereto, as specified by the Executive Director." The information to be monitored and reported all comes from the User. The User should be responsible for providing this information to the regulatory agency directly. The Producer/Distributor has no way to know this information unless it is provided to them by the User. For instance, the Producer/Distributor with appropriate technology will know how much recycled water is sent to the User daily, but will not know how much the User has applied to the turf that day, especially if the recycled water is delivered to a storage reservoir. Also, only the User will know the amount of fertilizer that is applied to the turf. The Producer/Distributor has no way of knowing this unless the User provides the information to them. There is no reason for this extra step of giving the data to the Producer/Distributor so that the Producer/Distributor can turn around and give it to the regulatory agency. This provision needs to be reworded to read, "The User shall comply with Monitoring and Reporting Program No. 2009-XXXX-DWQ and revisions thereto, as specified by the Executive Director."

21. Provision 4. Paragraph (d) of this provision indicates that the site supervisor should be responsible for "Routine inspection and maintenance of backflow prevention devices installed to protect potable water supplies, consistent with section 7605 of Title 17, California Code of Regulations;" The domestic water purveyor tests the backflow devices to ensure the safety of the potable water supply. In our area, CVWD tests the backflow devices not the customer.

22. Provision 5 (b). Paragraph (b) of this provision states that, "The general Irrigation Management Plan shall include measures to ensure the use of recycled water occurs at an agronomic rate while employing practices to ensure irrigation efficiency necessary to minimize application of salinity constituents (by mass) to Recycled Water Use Areas." Again all of the information provided in this section except for

the "ii. Recycled Water characteristics" would come from the Recycled Water User and should be provided directly to the regulatory agency rather than to the Distributor to then provide to the regulatory agency. This provision needs to be stated as indicating that the "User shall submit an Operations and Maintenance Plan to the regulatory agency." The Producer/Distributor should not develop an O&M plan for another business, such as a golf course, just as a golf course should not provide an O&M plan for the recycled water treatment business. Golf courses are not certified as wastewater operators and wastewater operators are not certified as turfgrass management specialists.

In addition, Recycled Water Users such as golf courses and home owners associations have hundreds of plant species. Providing the requirements of the plant species being irrigated does not seem to be a feasible task. In the Coachella Valley, there are warm weather plantings and cool weather plants and turf. This creates twice as many additional species for which to account. Please remove this requirement, as it is a daunting unwarranted task.

23. Provision 5 (c). Paragraph (c) of this provision states that, "A copy of the approved Title 22 Engineering Report submitted to CDPH and any recommendations or "conditions of approval" provided by CDPH." For this area, some of these reports were provided to the CDPH as far back as 1969 and 1987. Will these need to be resubmitted? Or does the CDPH plan to locate these reports and provide a copy to the User? Legally, aren't these types of documents only required to be kept for 10 years?

24. Provision 5 (f). Paragraph (f) of this provision states that "A copy of the duty statement for the recycled water use supervisor responsible for the Use Area" should be submitted with the O&M Plan to the State Water Board. Please define what the "duty statement" is, how it should read, and what the legal ramifications of being a recycled water use site supervisor are once this statement is provided to the State Board.

25. Provision 14. This provision states that, "The Distributor shall report any noncompliance that may endanger human health or the environment." Situations such as these should fall along the same lines as the Statewide SSO reporting, where on occasions where a spill occurs from a private lateral, the reporting is the responsibility of the owner of the line. The recycled water agreements with CVWD stop all responsibility for CVWD at the meter. Anything after the meter is the responsibility of the User. This would include the responsibility to report that their system has caused a noncompliance that may endanger human health or the environment.

26. Monitoring and Reporting Program. The information required to be monitored and reported in this section is all based on the User. However, it does not state anywhere that the User is to provide this information to the Producer/Distributor, only that the Producer/Distributor is to provide this information to the regulatory agency or that the

Distributor shall ensure the condition of the use area with weekly examinations. The User needs to provide the required information to the regulatory agency directly. For example, the Producer/Distributor does not know how much chemical is being applied through fertigation or chemo-irrigation unless the User reports it to them. The information required to be noted in the logbooks that are required to be packed around by the Distributor is probably already kept by the User, especially if the user is a golf course or landscaping company.

That being said, the amount of information required to be provided to the regulatory agency is astronomical. For the daily reporting/monitoring, the Producer/Distributor would be responsible for reporting 2,190 elements annually for each User. This would equate to 35,040 elements for CVWD's existing 16 User's and 65,700 elements in the future when CVWD is serving approximately 30 facilities with recycled water. However, not only is daily monitoring and reporting required but also weekly observation notations and reporting on a monthly and annual basis. Reporting all of this information will take away too much time from the Users actually operating their business. Some of the required information, such as daily water application rate, nitrogen application rate, volume of water applied will only be able to be obtained through sophisticated irrigation equipment and software programs. Home Owners Associations, and High Schools do not have such equipment and software programs, nor funding to obtain these items at their finger tips to be able to report on these parameters. In addition, it makes no sense to require daily monitoring of application in areas that have deep groundwater and little rainfall like that found in the Coachella Valley. The concerns related to inefficient application in this area can be reasonably identified through monthly or quarterly monitoring without presenting an unreasonable risk to local water supplies. Monthly or quarterly monitoring at the Use Area would also be consistent with the recycled water monitoring already being performed by the Producer for these same constituents.

It seems as though all of the information that has been required to be reported by the Distributor annually, is already a requirement of the Waste Discharge Requirements of the Wastewater Treatment Plant. This would lead to duplicate reporting of the same information. Again, item 1. "A summary of the entries made into the logbook for each Use Area during each week of the previous calendar year;" should be provided by the User.

27. Attachment A, Definition A. The definition for agronomic rate states, "The rate of application of recycled water to plants that is necessary to satisfy the plants' watering and nutritional requirements, considering supplemental water (e.g. , precipitation) and supplemental nutrients (e.g., fertilizers), while preventing or strictly minimizing the amount of nutrients that pass beyond the plants' root zone." Controlling soil salinity levels is a critical element of the irrigation process that needs to be acknowledged in the definition for agronomic rate.

Some areas of the Coachella Valley consist of soils that are naturally high in salinity and require specific irrigation practices to leach these natural salts away from the plant root zone. CVWD worked with the U.S. Salinity Laboratory and U.S. Bureau of Reclamation to evaluate soil salinity issues and install subsurface drainage systems serving over 37,000 acres in the Coachella Valley where perched groundwater containing elevated levels of salinity occur naturally and must be leached and drained in order to reclaim the beneficial use of these lands. This process is also used to prevent the buildup of salts found in irrigation water sources which includes Colorado River water and recycled water. In order for this process to work, irrigation water is applied in excess of the evapotranspiration (ET) rate periodically to force concentrated salts past the root zone of the plant. This process is implemented so that turfgrass can survive in soils and irrigation water with elevated salinity. As it is, golf courses are very efficient with water and employ several water conservation methods. They do not waste water by irrigating irresponsibly. The amount of water used is efficient to grow the turf on their course, and the application method is dependent on the water quality and soil type yet still efficient for growing the turf on their course.

Groundwater used for drinking water purposes in the Coachella Valley is found in excess of 100 feet below the ground surface. In areas with unconfined aquifers where recycled water is applied, the water table is typically over 200 feet below ground surface. While some areas of the Coachella Valley have shallow groundwater, this groundwater contains naturally occurring elevated salinity levels and is not used as a drinking water source. In these areas, confined aquifers occur below aquitards that separate shallow groundwater with elevated salinity from high quality groundwater used for drinking water sources.

Please revise the definition of agronomic rate to state, "The rate of application of recycled water to plants that is necessary to satisfy the plants' watering and nutritional requirements and salinity tolerances, considering supplemental water (e.g., precipitation), soil conditions (e.g., salinity) and supplemental nutrients (e.g., fertilizers), while preventing or strictly minimizing the amount of nutrients that ~~pass beyond the plants' root zone~~ migrate into groundwater used for drinking water purposes."

28. Attachment A, Definition U. The definition for "Salt and Nutrient Management Plans" does not provide the same description of Salt and Nutrient Management Plans provided in the Recycled Water Policy. The Recycled Water Policy in its entirety should be referenced for Definition U.

29. Attachment C, Best Management Practices (BMPs), Required BMP B. This BMP requires "Proper design and operation of sprinkler heads." It is not clear what would be required to have a proper design of sprinkler heads. This requirement seems to require the User to ensure the manufacturer of the sprinkler head used a proper design. Since this is a required BMP, greater specificity should be provided for Users to determine what is required of them to comply with this BMP. It should be

understood that as-built plans for existing Use Area irrigation systems may not exist and would be cost prohibitive to re-create.

30. Attachment C, Best Management Practices (BMPs), General Operating Controls A. This BMP states, "The recycled water use supervisor attends regular training regarding the safe and efficient operation and maintenance of recycled water use facilities." Please define the word "regular" by stating how often this training is to occur. Please define where the training is provided, what the training entails, and who is doing the training.

31. Attachment C, Best Management Practices (BMPs), Efficient Irrigation II. This BMP states that, "Each site supervisor has been provided a conductivity tester as a tool to help them determine the difference between recycled water and potable water." Please define who is to provide the conductivity tester to the site supervisor. Conductivity testers can range in price but some are around $500. Therefore, for 16 customers, this cost is $8000. For 30 customers, the cost is $15,000. CVWD provides the cross-connection tests and surveys for the recycled water users. CVWD tests the conductivity of the water. There is no reason for each user to incur an additional cost for a service that is provided to them for free.

32. Attachment C, Best Management Practices (BMPs), General Comment. It is not clear how all of this additional equipment and monitoring and reporting requirements encourage existing Users to continue to use recycled water or future Users to want to use recycled water. The CDPH has already produced a document referred to as the "Purple Book" that can be used as a reference guide rather than creating another document. It is reasonable to expect that Attachment C, like many of the requirements contained in the subject permit, will be an effective way to discourage recycled water use in California.