



Inland Empire Utilities Agency
A MUNICIPAL WATER DISTRICT

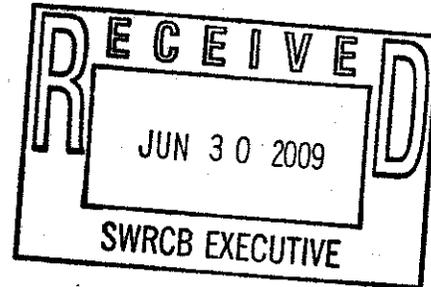
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June 30, 2009

Via Electronic Mail and U.S. Mail

Charles R. Hoppin, Chair and members
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

ATTN: Jeanine Townsend, Clerk to the Board
commentletters@waterboards.ca.gov



Dear Chair Hoppin and Members of the Board:

Subject: Comments on June 18, 2009 Draft *General Permit for Landscape Irrigation Uses of Municipal Recycled Water*

Thank you for the opportunity to submit comments on the draft *General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water (General Permit)*. As a major recycled water producer (20,000 AFY) we believe that a streamlined, simple permitting procedure for recycled water is essential to meet the goals of the California Water Plan and the Water Board's Recycled Water Policy. We are aware that the Association of California Water Agencies, the California Association of Sanitation Agencies and the WateReuse Association (the associations) have submitted comments on the General Permit, and we endorse the changes the associations have recommended.

However, as noted in our May 26, 2009 comments on the May 2009 draft General Permit, our existing permit provides a better and more streamlined system for effectuating recycled water projects and we would have no interest in seeking coverage under the General Permit for our existing program or any new projects. Landscape irrigation sites that utilize recycled water within our service area are authorized through the California Department of Public Health's (CDPH's) Title 22 Engineering Report Process and each proposed site is reviewed by CDPH to insure that a trained On-Site Supervisor (OSS) is designated, cross connection compliance has taken place, appropriate retrofit modifications have been made, periodic site inspections have been performed, and rules in conformance with the uniform state reclamation criteria are in place and enforced. We have developed procedures with our seven participating cities to provide them

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with the authority to conduct the periodic site and cross connection inspections, which would not be allowed under the draft General Permit. This implementation program is efficient and cost effective because it is performed by the entity most familiar with the details and day-to-day operations of the sites, and it is tailored to the complexity of each site and its specific needs, rather than a mandated quarterly inspection system, which would be expensive and unnecessary. For example, the cost of conducting quarterly inspections per the General Permit would increase costs by a factor of 4, yet it would seem unnecessary to have the same level of inspections for a highway median as a school playground. Even dual plumbed buildings, the type of use of most concern to CDPH, are only required to be inspected once per year.

Another example is Prohibition 10 that disallows the use of equipment or facilities that have been used to convey recycled water to be used for potable water supply conveyance. Clearly, there will be circumstances, such as water trunks or tanks, which can be sufficiently cleaned so they can be used for potable water. This issue could be evaluated by CDPH on a case-by-case basis or by applying appropriate best management practices, rather than as a specific prohibition.

Thus, we strongly encourage the Water Board to make the necessary changes so that the General Permit can facilitate water recycling in the state per its statutory mandate. We still feel that watering grass with high quality recycled water should be routine and that a greater level of delegation of state health authority to local water purveyors should be emphasized and included in the General Permit. Thank You for taking the time to review and consider our comments.

Sincerely,

INLAND EMPIRE UTILITIES AGENCY



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