

A Public Agency



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3/20/07 BdWrshp Item 8
Water Recycling
Deadline: 3/27/07 5 pm

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March 26, 2007

Tam M. Doduc, Chair, and Members
State Water Resources Control Board
P.O. Box 100
Sacramento, Ca 95842

Attention Song Her, Clerk to the Board

Re: *Development of a Statewide Policy for Water Recycling*

Dear Chair Doduc and Members of the Board:

The Amador Water Agency (Agency) provides water and wastewater services to a majority of Amador County. The Agency appreciates the opportunity to comment on the State Water Resources Control Board's (Board) consideration of a statewide water recycling policy.

The Agency has two recycle projects in the planning and design phases. Permitting and monitoring requirements of these projects will be costly to implement and operate. The Agency has a relatively small customer base and added requirements could force these projects to be unfeasible. The Agency believes that recycling provides an excellent opportunity to extend water supplies. Recycled water could be utilized for golf courses, landscaping, industrial, institutions, agriculture, and pasture lands within Amador County.

Inconsistencies among regional boards tends to result in overly conservative interpretations that end up adding layers of costs that limit or eliminate the Agency and other purveyors from initiating water recycling projects. The Board should implement a Statewide Recycling Policy. The Agency has read and concurs with comments provided by the Wateruse Association. In addition, the Agency would like to highlight some specific items:

Irrigation Projects and Salts

The Agency has a very high quality water source with low salts and further would be irrigating at agronomic rates.

If recycled water meets water quality objectives for the groundwater basin then no additional regulations should be applied;



If recycled water does not meet the water quality objectives, then mass balancing should be allowed;

If assimilative capacity exists, projects with recycling should be allowed to utilize the capacity due to water supply benefits.

The Agency believes that ground water monitoring is un-necessary following initial confirmation of ground water and effluent qualities. Given on-going monitoring of plant effluent quality and irrigation oversight through a Master Reclamation Permit, no further ground water monitoring should be required.

Groundwater monitoring should not be required for recycled water irrigation projects.

Impoundments

The Agency believes that impoundments should not be subject to further requirements and monitoring for water quality given that the recycled water meets water quality objectives.

No additional regulation should be required if an impoundment meets groundwater objectives.

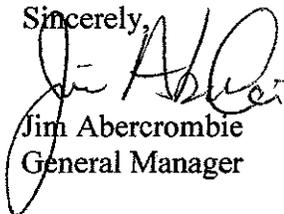
Impoundments should be allowed to utilize assimilative capacity.

Anti-degradation Policy

The Water Recycling policy should define "maximum Benefit to the people of the State" and what constitutes "Best Practical Treatment and Control" for water recycling projects.

The Agency believes that a Statewide Recycle Policy will provide uniform requirements to facilitate and encourage use of recycled water for irrigation while adequately and appropriately managing public health and anti-gradation concerns.

Sincerely,



Jim Abercrombie
General Manager

Cc: AWA Board Members