

State of California

Department of Health Services

Memorandum

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

Date: March 27, 2007

To: Dorothy Rice, Executive Director
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812

From: *Rufus B. Howell*
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Subject: Development of a Statewide Water Recycling Policy
Board Meeting (March 20, 2007)



Pursuant to the State Water Resources Control Board's workshop of March 20, 2007 regarding issues associated with the development of a statewide policy for water recycling, we offer the following comments:

We concur that the State Water Board should develop a statewide Water Recycling Policy.

The California Department of Health Services (CDHS) is developing criteria for groundwater recharge with recycled water. These criteria must address all the public health issues associated with recharge of an aquifer used for domestic use. The statewide policy could identify those issues that should be addressed solely by CDHS regulation. The draft groundwater recharge reuse criteria rely on a soil-aquifer treatment zone extending down gradient from the recharge site as a barrier to some contaminants. This approach recognizes that some degradation exists within the soil-aquifer treatment zone. The policy could endorse this approach to controlling contaminants.

Policy direction to the Regional Water Boards on how to interpret and implement state statutes and regulations with respect to water recycling projects would reduce statewide inconsistency. Use of CDHS notification levels for chemicals and groundwater monitoring requirements below recycled water use sites are two issues that could benefit from statewide policy.

Aquifer storage and recovery of recycled water could allow communities to maximize use of recycled water. Statewide policy on the designation of aquifer storage zones would facilitate the practice.

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Groundwater quality objectives and monitoring below recycled water storage and use areas should be encouraged in policy to protect groundwater. The Title 22, California Code of Regulations requirements for recycled water only address public health risk from direct exposure and irrigated food crops – not environmental impacts.

We are available to assist the State Water Board staff with the development of a policy on recycled water.

Please call me at (916) 449-5577 if you have any questions.

cc: Robert Hultquist
Drinking Water Program