

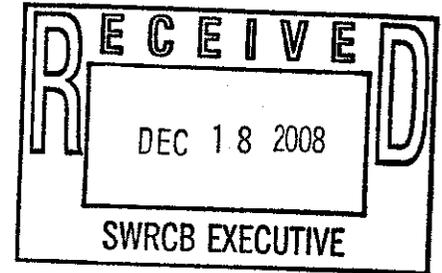


South Orange County Wastewater Authority

Public Comment
Recycled Water Policy
Deadline: 12/22/08 by 12 noon

December 11, 2008

Jeanine Townsend
Acting Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento CA 95812-0200



Re: Comment Letter – November 4, 2008 Draft Recycled Water Policy

Dear Ms. Townsend:

The South Orange County Wastewater Authority (SOCWA) would like to thank the State Water Resources Control Board (SWRCB) for the opportunity to provide written comments on the revised Water Recycling Policy. For over forty years SOCWA and its member agencies have successfully produced and purveyed recycled water in the southern portion of Orange County.

The SOCWA service area has very little underlying potable quality groundwater and the groundwater is naturally salty due to soil geology and proximity to the ocean. Therefore, we applaud the Board for producing a Policy that promotes the development of stormwater and dry weather urban water runoff as sustainable long-term water resources.

However, the permit like aspects of the Policy are a concern to our member agencies, especially the requirements to address recycled water use site sprinkler problems within 72 hours or before the release of 1000 gallons. Collectively, our member agencies have nearly 2000 recycled water use sites. It will be very costly for both the State and recycled water purveyors to meet the sprinkler leak response provisions of this Policy and the provisions, if adopted, are unlikely to result in any measureable water quality improvement. We strongly urge the Board to remove these provisions from the Policy and rely instead on a best management practices to control use site runoff.

SOCWA shares the desire for a better understanding of trace levels of Constituents of Emerging Concern (CEC) in recycled water. However, we believe it would be extremely wasteful to require statewide testing for CECs at this time. The inherent newness of the CEC science will result in ineffective and wasteful expense of limited funds. We believe CECs are an issue best addressed by the California Department of Public Health when groundwater recharge is an issue, and are not appropriate testing requirements for all recycled water irrigation projects.

Similarly, the cost of performing priority pollutant testing twice per year on recycled water is unnecessary and duplicative since most POTW's producing recycled water are mandated to perform priority pollutant testing on the POTW influent and effluent flow streams to meet source control program requirements.

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SOCWA is concerned that the model Salt and Nutrient Management Plan highlighted in the Policy was developed at significant Stakeholder expense during an economic period that was very different than today's current situation. While we understand and agree with the need to produce such plans, given the current economic conditions, we believe the Board should extend the time frame for plan completion.

Please understand that while we do stand ready to support a policy that promotes the use of recycled water and is effective in protecting the beneficial uses of the local water basins and the waters of the State, we do not fully support the policy as it is currently drafted. Thank you for the opportunity to provide these comments. If you require additional information please contact Brennon Flahive at (949) 234-5419.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY



Tom Rosales
General Manager

TR/bf

cc: Don Chadd – Trabuco Canyon Water District
Michael P. Dunbar – South Coast Water District
Dr. Robert Gumerman – Moulton Niguel Water District
Robert R. Hill – El Toro Water District
Paul D. Jones II – Irvine Ranch Water District
John O'Donnell – City of San Juan Capistrano