



7051 Dublin Boulevard
Dublin, CA 94568-3018

**Public Comment
Proposed SWA Regulation
Deadline: 9/12/17 by 12 noon**
phone (925) 828-0515
fax (925) 829-1180
www.drsrd.com

September 12, 2017

Sent via Email to commentletters@waterboards.ca.gov

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000



Subject: Comments – Proposed SWA Regulations

Dear Ms. Townsend:

Dublin San Ramon Services District (DSRSD) appreciates the opportunity to provide comments on the proposed regulations for surface water augmentation (SWA).

DSRSD provides sanitary sewer services to 154,000 people in Dublin, southern San Ramon, and Pleasanton and partners with East Bay Municipal Utility District and the City of Pleasanton in producing tertiary treated recycled water for landscape irrigation. During the 2014-2016 drought, DSRSD maximized its recycled water use to meet state water conservation requirements. In 2016, recycled water made up 24 percent of DSRSD's total water deliveries. Currently, DSRSD is working on a potable reuse feasibility study with Zone 7 Water Agency, City of Livermore, City of Pleasanton, and California Water Service-Livermore. Our region is seeking to improve its long-term water supply reliability and is studying the role of potable reuse.

DSRSD encourages the SWRCB to consider all comments that promote and facilitate the implementation of recycled water projects while protecting public health and the environment. Having rigid requirements without alternatives may reduce or eliminate the potential for surface water augmentation projects in the Bay Area. To that end, DSRSD recommends the following:

- Section 60320.302. Allow an alternative to RO-based treatment. Significant work is complete, and more is underway, documenting the water quality benefits of O₃/BAF when used with supplementary technology such as UF, GAC, and UV.
- Section 60320.302(c)(1). Allow a test surrogate for 1,4-dioxane, as this hazardous chemical is difficult to safely seed into a treatment system.
- Section 64668.30(b)(2). Allow for less than 60 days of theoretical retention time based upon demonstration that the response retention time (RRT) and treatment value of the 60-day storage period is met by other means approved by the State Board.

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- Section 64668.30(c)(2). Allow for more than 10 percent of new water, by volume, to be recently purified, based upon demonstration that sufficient treatment has been provided to account for chemical and microbiological pollutants. The other/additional methods of treatment to be approved by the State Board.

Thank you for your consideration. Should you have any questions about these comments, please feel free to contact me at mcintyre@dsrsd.com or Rhodora Biagtan at biagtan@dsrsd.com.

Sincerely,



Daniel McIntyre
General Manager

cc: Amparo Flores, Zone 7 Water Agency
Dan Martin, City of Pleasanton
Helen Ling, City of Livermore
Frank Vallejo, California Water Service-Livermore
Andrew Salveson, Carollo Engineers