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JARED BLUMENFELD
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

Division of Drinking Water

March 13, 2020

Cathleen Goodwin
North Coast Regional Water Quality Control Board
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95408

CITY OF ROHNERT PARK TITLE 22 ENGINEERING REPORT FOR DISTRIBUTION AND USE OF RECYCLED WATER (4990014-701)

Dear Ms. Goodwin,

This letter transmits Division of Drinking Water's (DDW's) conditional acceptance for the City of Rohnert Park (City) Title 22 Engineering Report for Distribution and Use of Recycled Water (Engineering Report) dated November 26, 2018. The Engineering Report addresses DDW comment letter dated November 5, 2018. On March 11, 2020, the City submitted a revised Appendix D – Recycled Water User's Guide to address DDW comment sent on March 9, 2020.

The City is a water retailer and distributes potable water and recycled water to customers within the City's service area limits, which is bounded by the City's Sphere of Influence (SOI). The City is also responsible for collecting wastewater within city limits and is a partner in the Subregional System, which is operated and managed by the City of Santa Rosa. The City of Santa Rosa owns and operates the Subregional System's Laguna Treatment Plant, which produces disinfected tertiary recycled water for distribution and use within Cotati, Rohnert Park, Sebastopol, and the unincorporated South Park County Sanitation District.

The City had signed an agreement with the City of Santa Rosa to take over distribution of recycled water to its customers in July 2015. The City's recycled water distribution is currently operating under Subregional System's NPDES permit. The City plans to obtain its own permit coverage from the North Coast Regional Water Quality Control Board to administer its own recycled water program, primarily for delivery and use of recycled water within the City's service area.

The City currently delivers recycled water to its urban customers located within the City of Rohnert Park for the following uses:

- Landscape irrigation of parks, schools, commercial properties, and common areas for homeowner associations

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

- Impoundments (fountains or other decorative water features)
- Dual plumbing (toilet flushing and fire sprinklers)

DDW recommends the following requirements be incorporated into the City's Notice of Applicability, including any necessary additions to the Monitoring and Reporting Program:

1. The City must use the latest version of its Recycled Water User's Guide that contains the March 2020 version of its Application for Retrofit to Recycled Water Service and for Recycled Water Use Permit. Subsequent updates to the Recycled Water User's Guide must be reviewed and accepted by DDW prior to implementation by the City's program.
2. The City is interested in utilizing recycled water for cooling towers, construction water, dust control, surface cleaning, and sewer flushing (by City staff) as listed below. The future uses are currently not described in this report. The City must revise the Engineering Report and the User's Guide and submit to DDW for approval prior to moving forward with such uses.
3. Any proposed plans and specifications for new dual plumbed recycled water use areas must be submitted for DDW approval prior to the delivery of recycled water to the facility. As required by Title 22 section 60314, report, plans, and specifications must include the following:
 - a. A report containing a detailed description of the intended use area identifying the following:
 - i. The number, location, and type of facilities within the use area proposing to use dual plumbed systems,
 - ii. The average number of persons estimated to be served by each facility on a daily basis,
 - iii. The specific boundaries of the proposed use area including a map showing the location of each facility to be served,
 - iv. The person or persons responsible for operation of the dual plumbed system at each facility, and
 - v. The specific use to be made of the recycled water at each facility.
 - b. Plans and specifications describing the following:
 - i. Proposed piping system to be used,
 - ii. Pipe locations of both the recycled and potable systems,
 - iii. Type and location of the outlets and plumbing fixtures that will be accessible to the public, and

- iv. The methods and devices to be used to prevent backflow of recycled water into the public water system.
 - c. Include a description of method to be used by the City to assure that the installation and operation of the dual plumbed system will not result in cross connections between the recycled water piping system and the potable water piping system (separation test). This shall include a description of pressure, dye or other test methods to be used for initial cross connection test and subsequent cross connection test every four years.
4. The inspections and the testing shall be performed by a cross connection control specialist certified by the California-Nevada section of the American Water Works Association or an organization with equivalent certification requirements. Please identify that person.
5. Annually after the initial separation test, the City shall ensure that the dual plumbed recycled water system (indoor and outdoor) is inspected for possible cross connection with potable water system.
6. The City shall notify DDW prior to conducting the cross-connection control test. DDW staff may witness the test.
7. Cross connection test for existing dual plumbed use area must be conducted every four years. The City must maintain documentation of the successful completion of the test. An annual inspection or cross connection survey must be performed for each site.
8. Record cross connection incidents as a part of the City's cross connection control program management. Document how the cross connection is discovered, corrected, and when services are returned to the customer's site.
9. New types of recycled water uses must be addressed by submittal of a revision or update to the Engineering Report.
10. Submit revisions and updates to the Engineering Report and any applicable appendices to DDW to reflect changes in operations and recycled water program management.
11. Any updates or changes to the Engineering Report must also be made in any application or documents submitted to the Regional Water Quality Control Board.

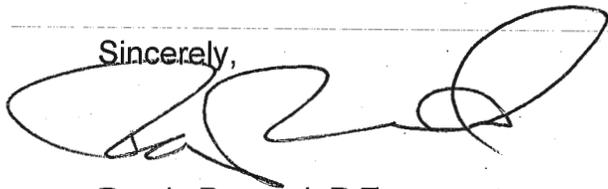
Cathleen Goodwin
North Coast RWQCB

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If you have any questions regarding this letter, please contact Sherly Rosilela at (916) 341-5578 or via e-mail at Sherly.Rosilela@waterboards.ca.gov, or please contact Randy Barnard at (619) 525-4022 or via e-mail at Randy.Barnard@waterboards.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Randy Barnard', written over a horizontal dashed line.

Randy Barnard, P.E.
Recycled Water Unit Chief
Recycled Water Unit
Division of Drinking Water

cc:

Mary Grace Pawson, City of Rohnert Park (mpawson@rpcity.org)

Janice Oakley, DDW-Sonoma

RWU File