

Item Number 6a

Supporting Document 8

February 13, 2020

Comment Letter from the District

March 5, 2020



February 14, 2020

Mr. Brandon Bushnell
California Regional Water Quality Control Board
San Diego Region
2375 Northside Dr., Suite 100
San Diego, CA 92108-2700

Subject: Comments for Tentative Order No. R9-2020-0010 (Reference: 263145 Bushnell)

Dear Mr. Bushnell:

Eastern Municipal Water District (EMWD) has reviewed the Tentative Order No. R9-2020-0010, *An Order Rescinding Order No. 2000-165, Waste Discharge Requirements for Eastern Municipal Water District, Temecula Valley Regional Water Reclamation Facility, Riverside County*. EMWD understands the purpose of rescinding the San Diego RWQCB Order No. 2000-165 for EMWD Temecula Valley Regional Water Reclamation Facility and supports the transfer of the regulatory oversight to the Santa Ana RWQCB for the production of recycled water under the current Order No. R8-2008-0008. Additionally, EMWD understands the distribution and use of recycled water within the San Diego Region 9 will still be regulated by the San Diego RWQCB but through the State Water Resources Control Board Order WQ 2016-0068-DDW, *Water Reclamation Requirements for Recycled Water Use*. EMWD offers the following comments on the Tentative Order.

EMWD's recycled water system is an integrated distribution system that connects all of EMWD RWRFs (San Jacinto, Moreno Valley, Perris Valley and Temecula Valley) and serves recycled water users in both the Santa Ana Region 8 and San Diego Region 9. These RWRFs are permitted under the Santa Ana Order No. R8-2008-0008. This past year, the RWRFs produced an average of approximately 43 MGD of recycled water. Temecula Valley contributed 13.4 MGD or 31% of

Board of Directors
David J. Slawson, *President* Ronald W. Sullivan, *Vice President* Stephen J. Corona Philip E. Paule Randy A. Record

2270 Trumble Road • P.O. Box 8300 • Perris, CA 92572-8300
T 951.928.3777 • F 951.928.6177 www.emwd.org

the recycled water produced. Recycled water users in San Diego Region 9 utilized 5,633 AF of recycled water which was 11% of the total recycled water produced. A small portion of the recycled water is utilized in the Auld Hydrologic Area (902.40) that exceeds the total dissolved solids (TDS) Basin Plan water quality objective of 500 mg/L. However, this is addressed in the Fact Sheet section in the Order No. 2000-165 where EMWD had provided evidence that the ambient groundwater was already exceeding the water quality objective and that EMWD use of recycled water would be much lower than the ambient groundwater. The determination provide in the Order was "that using the recycled water with a TDS concentration greater than the Basin Plan water quality objective would not degrade the groundwater within the basin." This is also supported by the work that Wildermuth Environmental, Inc., performed which was provided to the San Diego RWQCB staff as a Tech Memorandum dated April 11, 2019, *Groundwater and recycled water data analysis to support the completion of the EMWD's Report of Waste Discharge for the Temecula Valley Regional Water Reclamation Facility*. Therefore, EMWD would like to ensure that the determination finding for the recycled water use for the Auld Hydrologic Area would still apply when the Order is rescinded.

EMWD would like to thank the staff of both Santa Ana and San Diego RWQCBs for their effort and cooperation in changing the regulatory structure that would be applied. EMWD appreciates the ability to work together to come to mutual agreement on regulatory items as they arise.

Thank you for your consideration and should you have any questions, please contact me at (951) 928-3777, extension 6327 or email me at javiera@emwd.org.

Sincerely,



Alfred Javier

Director of Environmental and Regulatory Compliance

c Ryan Harris, SARWQCB
Christine Silken, SARWQCB