



May 27, 2014

commentletters@waterboards.ca.gov
State Water Resources Control Board

Subject: General Order Waste Discharge Requirements for Recycled Water Use

To Whom It May Concern:

On behalf of the Bay Area Clean Water Agencies (BACWA), we would like to thank the State Water Resources Control Board (SWRCB) and staff for developing a statewide general permit for non-potable recycling. BACWA's members include fifty-five publicly-owned wastewater treatment facilities and collection system agencies serving 6.5 million San Francisco Bay Area residents. We understand that WaterReuse California is also providing comments to the draft General Waste Discharge Requirement for Recycled Water Use. BACWA encourages the SWRCB to consider all comments that promote recycling while protecting public health and the environment.

BACWA's specific comment on the draft statewide permit addresses the fact that the draft permit does not clarify how currently permitted projects or those that wish to remain under their existing permits would be handled under the proposed general statewide permit. Recyclers currently operating under other permits that are acceptable to the recycler should be allowed to continue to operate under their existing permits for existing projects and new projects, and we request that a finding to this effect be added to the draft statewide permit. Many recyclers in the Bay Area operate under General Order 96-011, and we would like the option to remain with this permit for existing and new projects, and not have to opt into the proposed statewide general permit. Bay Area recyclers have a long history of operating under General Order 96-011 issued by Region 2 (San Francisco Bay Regional Water Quality Control Board) and have worked cooperatively with Region 2 to significantly expand the use of recycled water in the Bay Area.

Thank you for your consideration. Please contact me at dwilliams@bacwa.org if you have any questions.

Sincerely,


David R. Williams
Executive Director

cc: BACWA Executive Board
Linda Hu, BACWA Recycled Water Committee Co-Chair
Cheryl Munoz, BACWA Recycled Water Committee Co-Chair
Lorien Fono, BACWA Regulatory Program Manager