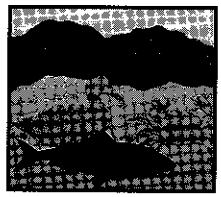
Regional Water Quality Control Plant

Operated by the City of Palo Alto
for the East Palo Alto Sanitary District,
Los Altos, Los Altos Hills, Mountain View,
Palo Alto, and Stanford

12/4/07 Bd. Mtg.
Water Recycling Policy
Deadline: 10/26/07 by Noon



October 23, 2007

Jeanine Townsend, Acting Clerk to the Board
State Water Resources Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Water Recycling Policy

Dear Ms. Townsend:

Thank you for the opportunity to comment on the State Water Board's Proposed Water Recycling Policy. The City of Palo Alto operates a regional wastewater treatment facility that discharges an average of 25 million gallons per day (MGD) of treated wastewater to San Francisco Bay. Currently, the City provides as much as 1 MGD of disinfected tertiary recycled water for irrigation uses within the City of Palo Alto. Construction of a new pipeline that will provide an additional 3 MGD to neighboring Mountain View began recently. In addition, the City of Palo Alto is preparing a facilities plan for a new pipeline that would significantly expand the use of recycled water within Palo Alto. Palo Alto is committed to maximizing the benefical reuse of recycled water in our community, and we appreciate the State Water Board's efforts to encourage its use by calling for uniform permitting and regulatory requirements throughout the state.

After reviewing the proposed policy, we are concerned that mandating a maximum increase in total dissolved solids (TDS) between a community's source water supply and its produced recycled water will serve as a deterrent to recycled water projects in many communities. In fact, potable water conservation programs and use of recycled water for indoor applications such as toilet flushing, urinals, and industrial processes both tend to increase the TDS levels in wastewater plant influents and recycled water. As a community encourages water conservation while achieving significant indoor recycled water use, this increase is likely to be significant.

Therefore, we do not believe we can operate a Recycled Water Program with an incremental TDS limit such as the 300 mg/L one proposed. We agree that appropriate actions should be undertaken when recycled water TDS levels are substantially higher than TDS levels in source water. However, we propose that the Water Recycling Policy require preparation and implementation of a TDS Reduction Action Plan to address high TDS levels rather than a permit requirement that specifies a maximum allowable TDS difference between source water and recycled water. The Action Plan could include steps such as discouraging self-regenerating water softeners, controlling high TDS industrial discharges, and limiting groundwater infiltration to sewer collection systems where saline

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groundwaters are present. We also propose that the Water Recycling Policy allow a recycled water producer to argue, based on site specific circumstances, that the specified trigger for preparing an action plan is not applicable by demonstrating that groundwater and soil are not adversely impacted. This may be the case in communities where the groundwater TDS is greater than that of the recycled water, and where it can be verified that salt buildup is not occurring in soils.

Thank you for your consideration of these comments.

Best regards,

Phil Bobel, Manager
Environmental Compliance Division