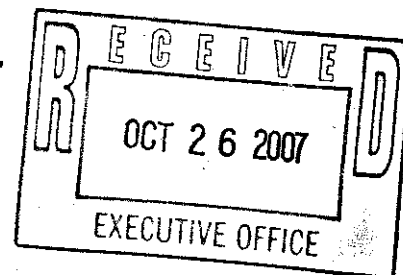


**State of California
Department of Public Health
Division of Drinking Water and
Environmental Management
1616 Capitol Avenue, 2nd Floor
P.O. Box 997377, MS 7400
Sacramento, CA 95899-7377
Office: 916-449-5577
Fax: 916-449-5575**



To: Jeanie Townsend
Acting Clerk to the Board
Phone:

From: Rufus B. Howell

Date: October 26, 2007

Fax: (916) 341-5621

Re: "Comment Letter – Water Recycling Policy"

☒ FYI	☐ Urgent	☐ For Your Review	☐ Reply ASAP	☐ Please Comment
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FYI:
Please see the following pages. The original copy will be hand carried to your office today.

Number of Pages Including Cover Sheet: 4



10/26/2007 10:29

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MARK B HORTON, MD, MSPH
Director

State of California—Health and Human Services Agency
California Department of Public Health

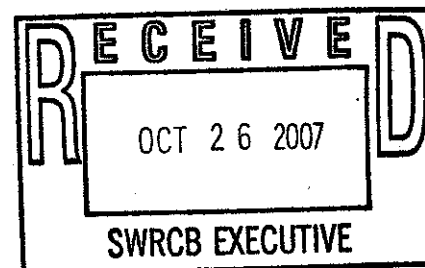


ARNOLD SCHWARZENEGGER
Governor

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

October 26, 2007

Jeanine Townsend, Acting Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
P.O. Box 100
Sacramento, CA 95814



Dear Ms. Townsend:

The California Department of Public Health (CDPH) has reviewed the State Water Resources Control Board's draft Water Recycling Policy distributed via E-mail on October 2, 2007, and offers the following comments for your consideration.

General Comments

CDPH notes that the definition of "recycled water" under Section 13050(n) of the California Water Code is much broader in scope than the applicability of the Water Recycling Criteria (California Code of Regulations, Title 22, Chapter 3, Sections 60301 to 60355) developed by CDPH. These requirements were developed to strictly address the public health concerns associated with the use of treated municipal wastewater, in whole or in part (CCR, Title 17, section 60302). These requirements do not apply to the reuse of other waste substances as defined under Section 13050(d). CDPH suggest that the differentiation be stated in the policy.

CDPH is in the process of developing comprehensive regulations to address planned groundwater recharge projects using recycled water and will likely clarify that source waters for such use will be limited to those of municipal wastewater origin. CDPH recommends that this differentiation be stated under Resolution No. 4.

CDPH recommends that all current references to "water reclamation requirements" be changed to "water recycling requirements".

Specific Comments:

Page 2, item number 10: CDPH suggests modifying in accordance with wording noted in bold as follows, "The California Code of Regulations, Title 22, Division 4, Chapter r3, **Water Recycling Criteria, specify uses of recycled water, treatment processes and**

State Water Resources Control Board

Page 2

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performance criteria, operational requirements, monitoring requirement, and reliability features for ensuring proper oxidation, filtration and disinfection of recycled water. They also specify **use site, impoundment, and dual plumbed** requirements for limiting public contact with recycled water to protect public health, in **addition to cross-connection control requirements.**

Page 2, item number 17: It is unclear how this would be interpreted or implemented in a regional board order for groundwater recharge reuse projects. Use of the terms, "certain constituents" and "when hydrologic conditions are appropriate," is extremely ambiguous and could be inappropriately applied by the regional boards.

Page 3, item number 19: The summary of findings and conditions issued by CDPH are considered to be mandatory for the project not to be degrading the quality of the water in the receiving aquifer as a water supply for domestic purpose and protective of public health.

Page 4, item 25: CDPH does not consider the summary of findings and conditions for groundwater recharge projects to be recommendations, but are necessary requirements for CDPH to recommend approval of the project. If any conditions are modified, changed or deleted without consent of CDPH then approval of the project by CDPH is withdrawn.

Page 5, Resolution number 4: See General Comment number 2 above.

Page 5, Resolution number 7: After item (b), insert a new (c) and renumber the succeeding items as follows, "the goal of recycled treatment plants is to operate in a manner that optimizes the removal of pathogens through both the filtration and disinfection processes."

Page 6, Resolution number 10: CDPH recommends that the wording at the beginning be changed to read, "For constituents for which CDPH has established an MCL or has identified limits for public health protection,..." and delete Resolution number 11. CDPH, as its mission, is charged with the responsibility for protecting public health, not the regional boards.

Page 7, Resolution numbers 14 and 15: CDPH suggests replacing these two resolutions with one which reads as follows: "For groundwater recharge reuse projects, the RWQCB shall require the discharger to comply with conditions established by CDPH."

10/26/2007 10:29

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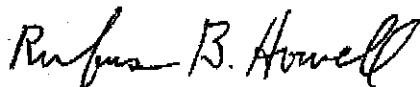
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Jane Townsend
State Water Resources Control Board
Page 3
October 26, 2007

Page 8, Resolution number 19: CDPH suggests modifying in accordance with wording noted in bold as follows — "...or waste discharge requirements, **provided such requirements are not in existing regulations**, for a water recycling project,..."

CDPH applauds your agency's intent to establish uniform procedures and implementation of requirements for water recycling projects and appreciates the opportunity to review and comment on your draft Water Recycling Criteria. If you have any questions concerning our comments, please contact me at (916) 449-5577.

Sincerely,



Rufus B. Howell, Chief
Division of Drinking Water
and Environmental Management

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Fax Call Report

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916-341-5621
2007-Oct-26 10:35 AM

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770	2007-Oct-26 10:34 AM	Receive	9164495575	0:36	4	Success
	10/26/2007 10:29	9164495575	DHS-DDWEM		PAGE 01/04	

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