



Glendale Water & Power
Administration

141 North Glendale Ave., Level 4
Glendale, CA 91206-4496
Tel: (818) 548-2062 Fax: (818) 240-4754

June 22, 2018

Jeanine Townsend
Clerk to the Board
California State Water Resources Control Board
via electronic submission at: commentletters@waterboards.ca.gov



RE: Comment Letter – Proposed Recycled Water Policy Amendment - Glendale

Dear Ms. Townsend,

Please accept this letter as an electronic submission of Glendale Water & Power's (GWP) comments on the State Water Board's "Proposed Recycled Water Policy Amendment".

I have three comments and have numbered them below. In each comment I have also provided a scenario to help provide context for the comment. I am available to clarify my comments and can be reached at (818) 548-2107 if that would be helpful.

GWP Comment 1

Allowing "discharges to the waters of the United States" for tertiary-treated recycled water system discharges for essential operations, maintenance activities, and emergency discharges, following best management practices and the applicable discharge permit requirements, if one is in place, would be a beneficial change that would provide a similar level of protection as the General Permit for Drinking Water System Discharges.

The example scenario is a recycled water main break that drains to the same channel or tributary channel where the water reclamation plant that is the source of the recycled water has an NPDES permit to discharge to that same channel. In this case, the City of Glendale's recycled water is generated at the Los Angeles-Glendale Water Reclamation Plant, which has an NPDES permit to discharge to the LA River. All of Glendale's service area drains into the LA River or the Verdugo Wash which is a tributary channel to the LA River channel. However, the requirements for maintenance and repair of the recycled water system is similar to untreated waste-water, instead of tertiary treated water that is permitted for discharge at a different point in the same channel.

GWP Comment 2

Adding a definition for a "project" would help clarify and streamline statewide consistency for permit requirements for recycled water. Specifically, a project could be defined as, new recycled water distribution systems or treatment facilities, new recycled water uses within an existing system that were not already permitted, or new recycled water system extensions that connect new portions of an agency's service area onto the recycled system.

The intent for many of the proposed changes appears to be to ensure safe use of recycled water for new uses and new recycled water systems, and to ensure that large reductions to historical flows in receiving waters is properly analyzed and accounted for. The current wording addresses those items, but restricts normal day-to-day use of existing recycled water systems that were installed originally as "projects" themselves. As currently proposed, a retail customer would



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actually avoid the use of recycled water due to the delays in permitting, and instead use potable water for toilet flushing, and irrigation, in order to have certainty in their ability to receive service and complete their facility redevelopment or upgrade. Ultimately, this could lead to fewer and fewer recycled water users and an increase in potable water use, as parcels and facilities are redeveloped in areas that already have recycled water systems.

One example scenario is the redevelopment of an existing building that is adjacent to an existing recycled water main. The original building did not have a recycled water connection and will be demolished with a new building built in its place. Ideally the new building would use dual-plumbing and have a dedicated recycled irrigation meter for its courtyard. Since retail customers come on and off an existing recycled water system, just like a potable water system, it seems that this would not be a "recycled water project" but instead simply the connection of new customer to an existing permitted system. The proposed changes don't make this distinction, making it difficult at the retail water service level to utilize existing, permitted, infrastructure.

Another example scenario is a Junior College that has existing dual plumbed buildings. The college has funding to renovate one of their other buildings and plans to use dual plumbing. This is a normal retail level connection to an existing customer that has already done an engineering report for dual plumbed use. Ideally, renovation of another building at the same facility would not require an additional engineering report nor a change petition and would not be considered a "recycled water project", but instead a connection to an existing permitted system with an already permitted use.

Thank you for the opportunity to comment, and I appreciate that comments generate additional staff research, but I hope that the comments provide some context from the perspective at the retail customer level.

Sincerely,
Michael E. De Ghetto, P.E.
Chief Assistant General Manager – Water
Glendale Water & Power