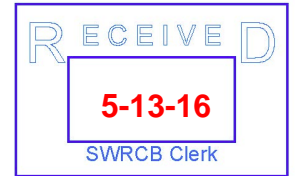




PUBLIC WORKS

CITY OF
**PALO
ALTO**

2501 Embarcadero Way
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650.329.2598



May 13, 2016

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

Subject: Proposed General Order for Recycled Water Use

To State Water Resources Control Board:

The City of Palo Alto appreciates the opportunity to provide comments on the proposed General Order for Recycled Water Use (General Order), which provides for water reclamation requirements (WRR) for recycled water use.

The City of Palo Alto owns and operates the Regional Water Quality Control Plant (RWQCP), a wastewater treatment plant that serves approximately 230,000 residents from the communities of the East Palo Alto Sanitary District, the City of Mountain View, City of Los Altos, Town of Los Altos Hills, City of Palo Alto, and Stanford University. The RWQCP produces high quality disinfected tertiary recycled water.

The City of Palo Alto encourages the SWRCB to consider all comments that promote and facilitate the implementation of recycled water projects while protecting public health and the environment. The City of Palo Alto supports the comment letter from the Bay Area Clean Water Agencies (BACWA).

1. City of Palo Alto does not support incorporating Finding 34 into the General Order.

As stated in BACWA's letter for more than 20 years the San Francisco Regional Water Board has regulated the City of Palo Alto's recycled water programs. The draft Water Reclamation Requirements for Recycled Water Use creates more regulatory barriers that hinder recycled water expansion.

2. If Finding 34 is incorporated into the State General Order, the City of Palo Alto recommends the following changes to the General Order to reduce unnecessary burdens on permittees.

The City of Palo Alto strongly urges the SWRCB to include a provision that might mitigate its negative impact on permittees. Regional Water Quality Control Boards shall be given discretion to require or waive the priority pollutant monitoring requirements in the WRR as appropriate. As a result, unless specifically required by their respective Regional Boards, permittees shall not be required to monitor for all priority pollutants when there is no reason to suspect the presence of such pollutants.



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In March 2016, Region 2, Regional Water Board adopted an alternative monitoring plan (R2-2016-0008) that specifically reduces the routine monitoring of priority pollutants in order to transfer the savings to our Regional Monitoring Program (RMP).

While the constituents monitored by these methods may have been cause for concern decades ago when they were incorporated into the California Toxics Rule, in recent years they have been detected here rarely and at levels lower than would pose an active threat to water quality. The concept behind the Alternate Monitoring Plan is that POTW funds are much better used to support emerging contaminants research through the RMP than continuing routine monitoring of historical pollutants in effluent. The General Order undermines this effort by reinstating monitoring requirements that were just removed by R2-2016-0008. Recycled water generally has lower pollutant concentrations than wastewater effluent, and should not be subject to additional monitoring requirements where Regional Water Boards determine that the data is of little value.

3. City of Palo Alto requests clarification for Finding 29.b.ii “Recycled water shall not create a nuisance condition specifically application of recycled water is controlled to prevent airborne spray.”

The City recommends that this statement be clarified that “application of recycled water is controlled to **minimize** airborne spray when the general public are present in the recycled water use areas.”

Thank you for your consideration. Should you have any questions about these comments, please feel free to contact Karin North at 650-329-2104 or by email to Karin.north@cityofpaloalto.org.

Sincerely,



Karin North
Watershed Protection Manager
Environmental Services Division