

May 12, 2016

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

Sent via e-mail: commentletters@waterboards.ca.gov

Subject: Comment Letter – Proposed General Order for Recycled Water Use

Dear Chair Marcus and Members of the Board:

The Sacramento Regional County Sanitation District (Regional San) appreciates the opportunity to provide comments on the “Revised” Proposed General Order for Recycled Water Use (General Order or Order). Regional San provides wastewater treatment for over 1.4 million residents and businesses in and around the Sacramento region, treating on average 150 million gallons per day (MGD) of wastewater. Regional San currently produces up to 3.5 MGD of recycled water which is distributed in the local community for landscape irrigation. However, we are in the process of constructing a \$2 billion dollar wastewater treatment plant upgrade, known as “EchoWater”. When completed in 2023, all of Regional San’s estimated 167,000 acre feet per year of treated water would meet water recycling standards and this high quality recycled water could be available for multiple beneficial uses.

Regional San previously commented on the proposed General Order in our letter dated February 22, 2016. In our letter, we were supportive of the State Board’s efforts to streamline the permitting process for recycled water projects and the renaming of the General Order as Water Reclamation Requirements, instead of Waste Discharge Requirements. This change in nomenclature by removing the term “waste” further advances the goal of having recycled water be viewed as a resource, and not as a waste. And although not all of our comments were addressed, we do appreciate that the April 22 revised draft General Order addressed one of our comments by replacing the word “hire” with “use” in regards to utilizing a third party.

While we continue to have the concerns outlined in our February 22nd letter, below is our additional comment on the revised Finding #34, as requested in the recent public notice.

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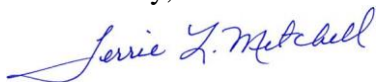
Claudia Goss
Public Affairs Manager

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Clarify that existing Master Reclamation permits will not be terminated with the adoption of this General Order. Finding #34, page 15, states that the existing Regional Water Board general order or conditional waiver will be terminated three (3) years after adoption of this Order. However, this language does not specify that existing Master Reclamation permits are excluded from this finding. Lack of such clarification may cause future complications for existing Master Reclamation permit holders. When we contacted the State Board staff to seek clarification on this matter, the staff indicated that the revised Finding #34 language only applies to existing general orders and conditional waivers and that it does not apply to existing Master Reclamation permits. We request that the language in the General Order reflect this clarification.

Regional San appreciates the opportunity to comment on the proposed Revised General Order. If you have any questions, please contact me at 916-876-6092, or mitchellt@sacsewer.com, or Samsor Safi at 916-876-6290, safis@sacsewer.com.

Sincerely,



Terrie Mitchell
Manager, Legislative and Regulatory Affairs

cc: Christoph Dobson, Director of Policy and Planning
Linda Dorn, Environmental Program Manager
Dave Ocenosak., Principal Engineer
Jose Ramirez, Senior Engineer