



Proposed General Order

Rhodora Biagtan, Co-chair
BACWA Recycled Water Committee

Proposed General Order

▶ Background

- Use for all non-potable uses except GW recharge
- Limited use of permit since introduction in June 2014
- Concerns over monitoring above existing permits
- Original public hearing in April 18, 2016 (written comments due February 22).
- Released revised proposed General Order, Friday, April 22, 2016
 - Postponed public hearing to June 7, 2016
 - Comments due May ~~9~~-13, 2016
- Expect revisions and 2nd hearing in May (likely May 18)

Proposed General Order

- ▶ Major Change
 - Finding 34 requires existing permit holders to enroll under proposed General Order within 3 years
 - Comments restricted to Finding 34 only

Proposed General Order

- ▶ BACWA Committee Discussion
 - Significant impact to current 96-011 permit holders in the Bay Area
 - Prepared comparison of proposed General Order with Order 96-011
 - Many similarities

Proposed General Order

- Committee Concerns

- Extent of Regional Water Board discretion unknown
- Enrollment requirements for existing permit holders to be the same as new permit applicants?
 - New Engineering Report?
 - New O&M Plans?
- Priority Pollutants Monitoring
- Salt & Nutrient Management Plan Requirement
 - Unchanged from Recycled Water Policy
- Airborne Spray application to be prevented
 - 96-011 restriction applies to secondary effluent
 - General Order restriction applies to all recycled water
- Frequency of user monitoring
 - May vary at Regional Water Board discretion
- Inadequate review time to understand impacts to operations
- Comments limited to Finding 34 only

Proposed General Order

- ▶ BACWA Comment Letter
 - Do not incorporate Finding 34 in the General Order
 - Extend comment period, allow comments on other provisions
 - If Finding 34 is incorporated:
 - After 3 years, existing permittees to be deemed enrolled into General Order
 - Regional Water Board to have discretion over pollutant monitoring requirements

Questions



Rhodora Biagtan

Biagtan@dsrsd.com

(925) 875-2255