



May 1, 2017

Ms. Marybel Batjer, Chair  
California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

RE: AB 2282 Implementation –Proposed Amendments to the California Plumbing Code and California Green Building Standards Code

Dear Ms. Batjer:

On behalf of WateReuse California, I thank you for the opportunity to provide comments to the proposed amendments to the 2016 California Plumbing Code, California Code of Regulations, Title 24, Part 5, which are being proposed by Department of Housing and Community Development, Department of Water Resources and the Building Standards Commission.

WateReuse California (WRCA) represents most of the recycled water purveyors in the state and was heavily involved in the development of AB 2282 (Gatto), which initiated this rulemaking. WRCA appreciates staffs' efforts to reach out to our member agencies that have participated in the stakeholder process. WRCA believes these efforts, and the subsequent changes in the proposals, have generally helped ensure compatibility and consistency with the plumbing code and the recycled water and cross-connection control regulations in Title 22, CCR, Division 4 and Title 17, CCR, Division 1 (Title 22).

We do, however, have a few remaining concerns and would like to offer the following comments on the proposed amendments to the California Plumbing Code:

**Clarify References to “Authority Having Jurisdiction/Enforcing Agency”**

All the provisions in the draft regulations call for “the Authority Having Jurisdiction” or “the Enforcing Agency” to take specified actions. These references to an unnamed entity are vague and may create confusion when there is already an entity with these specified responsibilities -- namely the permittee. California requires public water agencies that elect to treat and/or distribute recycled water to obtain a permit from the State Water Resources Control Board or a Regional Water Quality Control Board (RWQCB). These permits obligate the water agency to be responsible for many facets of the production, distribution, and use site conditions in compliance with state and local requirements. WRCA recommends the draft regulations refer to the permittee in cases where it has that responsibility and refer to the Authority Having Jurisdiction or Enforcing Agency when not applicable to the permittee or addressing Alternative Water Sources other than recycled water.

**Use Term “Recycled Water”**

The definition of Reclaimed (Recycled) Water in Section 220 should use the term “recycled water” only without reference to reclaimed water for consistency with Section 13050(n) of the California Water Code. This change will also create consistency with how other state agencies refer to recycled water. For example, in 2014 Caltrans adopted standard signage, doing away with the term “reclaimed water”, which requires all districts in the state to use informational signs that read, “Using recycled water.”

**For Recycled Water Use Title 22 Standard for Water Quality Requirements**

Section 1503.14 sets the minimum water quality treatment requirements for all recycled water uses at the tertiary level. There are a number of recycled uses commonly used in buildings that require less than tertiary treatment under Title 22. These uses include industrial processes that do not come in contact with people, such as boiler feeds or non-misting air conditioning. To be consistent with Title 22 this section should be changed to state: "The minimum water quality for recycled water shall meet the applicable water quality requirements as described in Title 22, CCR, Division 4, Article 3, Section 60303 et seq."

**Clarify Definition of "Recycled Water Supply System"**

It is our understanding that the definition of the "Recycled Water Supply System" is intended to describe the customers' facilities. We recommend draft regulations be clarified to include the following language at the end of Section 220.0: "This system is downstream of the meter, or if no meter exists, downstream of the property line, and owned and operated by the customer."

**Delete "Recycled Water" from the Operation and Maintenance Manual**

The regulations require a manual be prepared by the designer or installer of the alternative water source systems that includes diagram(s), instructions on how to operate the system, instructions on maintenance of the system, instructions on "startup, shutdown, and deactivating the system," inspection and testing requirements, "a method for contacting the installer and/or manufacturer(s)," and the requirement that the manual remain with the property. This duplicates much of what is already required by recycled water agencies. The terms "and recycled water" should be deleted from the Section 1501.6 regarding the operation and maintenance manual.

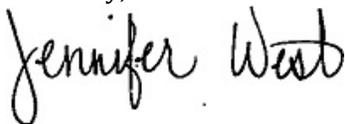
**Comments on Department of Water Resources draft regulations:**

**Recycled Water Testing: Modify Table 1503.15**

Title 22 requires dual-plumbed buildings be inspected annually. Inspection includes compliance with Title 22, which requires system identification such as tags and signage. WRCA recommends Table 1503.15 be modified to remove reference to "Inspect caution labels and marking" as it is already addressed in Title 22. Keeping all inspection and testing provisions for dual-plumbed recycled water use sites in Title 22 will avoid duplicative requirements and will avoid confusion if changes occurred in one and not both places.

Thank you for the opportunity comment on these standards. If you have any questions, please contact me at (916) 669-8401.

Sincerely,



Managing Director  
WateReuse California