



October 8, 2019

Mr. Randy Barnard
Attn: Ms. Sherly Rosilela
Division of Drinking Water, Recycled Water Unit
State Water Resource Control Board
P.O. Box 100
Sacramento, CA 95812-100

RE: Comment Letter – Direct Potable Reuse (DPR) Framework Second Edition

Dear Mr. Barnard:

On behalf of WaterReuse California (WRCA) we thank you for the opportunity to provide comments on the State Water Resources Control Board (Water Board) Second Edition of *'A Proposed Framework for Regulating Direct Potable Reuse in California'* (Second Edition Framework).

In general, WRCA **strongly appreciates and supports** the Second Edition Framework, particularly the determination that a phased approach to regulatory development is not necessary and that a single regulatory package can be prepared to be both protective of public health and cover a range of Direct Potable Reuse (DPR) scenarios, including Raw Water Augmentation and Treated Drinking Water Augmentation. We also support the timeline outlined in the Second Edition Framework, which indicates that the single regulatory package can be completed by 2023 – meeting the AB 574 statutory deadline.

This new regulatory approach also directly supports the recommendations outlined in the California WaterReuse Action Plan, which is focused on developing and streamlining recycled water regulations and permitting.

Below are specific comments on the Second Edition Framework.

Permitting DPR Projects

In Section 5.1.2 and Section 7.2, the Second Edition Framework states that DPR projects must be regulated with both Waste Discharge Requirements (WDRs) and public drinking water system permits or simply a public drinking water system permit. We support public drinking water system permits. This should be clarified to state that WDRs will not be necessary unless there is a discharge to waters of the state.

Monitoring and Daily Risk Objective

Section 5.1.4 recommends the establishment of a daily risk objective that would not exceed 2.7×10^{-7} per day (or 10^{-4} per year divided by 365 days) to avoid daily fluctuations in log reductions. WRCA appreciates that the viability of DPR will be largely supported by “real time” monitoring (Section 5.1.4.4) of water quality and supports the concept of a daily risk objective. However, we believe that the ultimate metric should look at the ability of a DPR project to meet a Daily Risk Objective within the context of redundant LRV treatment (log reduction in excess of the basic LRV treatment) and in consideration of overall risk factors. Some daily fluctuations might be supportable within this robust framework – we request consideration of the compounding effect of redundant safety features in the design of the framework to promote a more comprehensive approach to testing.

Drinking Water Treatment Plants as Part of DPR Treatment Train

WRCA supports the inclusion of a drinking water treatment plant (DWTP) as part of a DPR treatment train of separate treatment processes and allowing the inclusion of DWTPs to meet the required log reductions so long as capability of the DWTP can be demonstrated via treatability studies (Section 5.1.4.3, page 20).

However, we would recommend making the following change in text on page 20, recognizing that drinking water treatment plants treat a variety of source water supplies: *“Because existing drinking water treatment plants have been designed to treat natural **surface source** water **supplies** and not **Reverse Osmosis (RO)** permeate...”*

This approach also raises a number of questions about LRV compliance. For example, by validating the DWTP process in the same manner as the other individual treatment processes, could the DWTP lose its current LRVs it receives for surface water treatment via Treatment Technique method? We suggest clarification on the implications of various methods associated with validating LRVs for DWTPs, Advanced Water Purification Facilities (AWPFs,) and ensure overall alignment with the Surface Water Treatment Rule and Safe Drinking Water Act.

Environmental Buffer Monitoring

Section 7.15 states that “recycled water discharged to a reservoir or groundwater basin that is used as a source of drinking water must not degrade the water quality of the reservoir or groundwater basin.” While degradation is not typical of, or expected of DPR projects, this statement is not consistent with the state’s antidegradation policy, which allows degradation under certain circumstances. The Antidegradation Policy states that degradation can occur if it has been demonstrated that any change in water quality “will be consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial use of such water and will not result in water quality less than that prescribed in policies”.

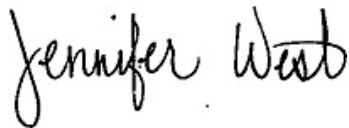
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Conclusion

WRCA applauds DDW for its work on the Second Edition Framework. We believe this framework sets California on a bold path to greatly expand potable reuse and ensure that local communities can develop sustainable, climate resistant sources of supply to meet the needs of our growing population.

Please contact Jennifer West at jwest@wateruse.org if you have any questions regarding these comments. We look forward to working with DDW to clarify the points raised in this letter and supporting your path forward to create the timely regulatory development for DPR.

Sincerely,

A handwritten signature in black ink that reads "Jennifer West". The signature is written in a cursive, flowing style.

Jennifer West
Managing Director

cc: Members, State Water Resources Control Board