



DPR Comments and SWB Responses

(August 2021 draft)

Differentiating between RWA and TWA

(New language allows RWA blending credits/higher allowable TOC and log reduction credits for SWTP. Recommend additional benefits of RWA should extend to other elements of the regs – Ex. source control and staffing)

Document/understand the need for the pathogen LRV requirements

(SWB released addendum explaining method behind 20:14:15 LRV . Recommend that the Expert Panel further review this justification since it seems that DDW did not use the information gathered in DPR-2 on raw wastewater concentrations, nor follow the approach proposed in DPR-1 for evaluating microbial risk.)

Specify performance goals and reduce prescriptive design criteria: Ex BAC/O3

(New language allows greater flexibility for the location of the O3/BAC and included additional performance goals [with 1-log reduction of acetone, formaldehyde, and NDMA]. Recommend to further reduce the prescriptive design criteria in favor of the performance requirements for chemical control, similar to AOP in the groundwater regulations that did not specify a specific method.)

Streamline redundant plans

AWT 5 Operators 24/7: revise to allow flexibility

(New language allows project to demonstrate equivalent operations oversight Section 64669.35)

Alternative Clause expand beyond just chemical control

(Recommend the scope of the clause extend beyond just chemical control (Section 64669.50) to entire regulations, similar to the alternative clause in groundwater recharge reg.)

2022-23 DPR Regulations Timeline

