



December 15, 2015

VIA EMAIL: Sean Gallagher, Clerk of the Boards [sgallagher@baaqmd.gov](mailto:sgallagher@baaqmd.gov)

**Subject: Request to Delay Adoption of Rule 11-10 Pending Review of Impacts to Recycled Water Use**

Dear BAAQMD Board members,

The Bay Area Clean Water Agencies (BACWA) appreciates the opportunity to comment on the Bay Area Air Management District's (BAAQMD) Rule 11-10. BACWA is a joint powers agency whose members own and operate publicly-owned treatment works (POTWs) and sanitary sewer systems that collectively provide sanitary services to over 6.5 million people in the nine-county San Francisco Bay (SF Bay) Area. BACWA members are public agencies, governed by elected officials and managed by professionals who protect the environment and public health. BACWA is concerned that Rule 11-10 may have the unintended consequence of preventing recycled water use in cooling towers.

The proposed revisions to Rule 11-10 would limit the Total Hydrocarbons detected in the recirculating cooling tower water at oil refineries to 84 ppbw as methane and allow a choice of monitoring methods, including EPA methods 8260 and 8270. By setting such a limit without regard to the baseline hydrocarbon concentration of the source water, this rule may inadvertently place some cooling towers out of compliance regardless of the integrity of their cooling systems, and would prohibit many more from using recycled water for cooling when the hydrocarbon concentration in the nonpotable water exceeds the new limit. In that case, the proposed rule would appear to conflict with state regulations concerning the use of recycled water in cooling towers (Div. 4, Chap. 3, Art. 3, Sec. 60306) which specifically allows the use of recycled water in cooling towers provided that the cooling water is disinfected with a biocide and the tower is equipped with a drift eliminator.

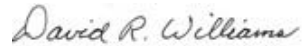
The Staff Report does not discuss the sources of water that may be used for cooling tower makeup, and does not discuss the background organic concentrations that may be found in properly-operating cooling tower systems that do not have any heat exchanger leaks, and it appears that these issues were not considered during the rule-making process. It is possible, even likely, that recycled water may have baseline concentrations of organics that would exceed the 84 ppbw limit, especially if measured using EPA methods 8260 and 8270. Recycled water is likely to contain organic compounds that do not contribute to harmful emissions from the cooling towers or indicate the presence of hydrocarbon leaks, but that would be measured as Total Hydrocarbons under Rule 11-10.

Recycled water is a key part of the Bay Area's response to the drought, and increasing industrial use of recycled water will help to ensure the long term water supply in our region. Since the intention of Rule 11-10 to discover heat exchanger leaks, not to limit the background concentration of organics in cooling

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tower water, BACWA requests that it not be adopted at the December 16, 2015 Board meeting so that this issue can be reviewed and so the Rule can be modified to allow daily leak detection without unintentionally blocking important water conservation projects.

Respectfully submitted,



David R. Williams  
Executive Director  
Bay Area Clean Water Agencies

cc: BACWA Board  
BACWA AIR Committee Cochairs  
BACWA Recycled Water Committee Chair  
BACWA Laboratory Committee Chair  
Daniel Jackson, Water Quality Supervisor, City of Benicia