

BACWA Recycled Water Committee Meeting Notes

**EBMUD Headquarters – 2nd Floor Small Training Conference Room at EBMUD Headquarters
January 18, 2017
10:00 a.m. – 12:00 p.m.**

1. Introductions – Biagtan

Mike Connor - EBDA
Roanne Ross – Whitley Burchett and Associates
Melanie Tan – Kennedy Jenks
Vince Christian – Regional Water Board
Jan Lee – City of Hayward
Linda Hu - EBMUD
Rhodora Biagtan - DSRSD
Lorien Fono - BACWA
On phone
Andrew Damron, Napa Sanitation
Amanda Roa, Delta Diablo
Zoey Lake, Delta Diablo
Kishen Prathivadi, Sewer Agency Midcoastline - Half Moon Bay
Andria Loutsch, CDM Smith
Matt Sagues, Marin Municipal Water District
Eric Hansen, SVCW
Cheryl Munoz, SFPUC
Kevin Booker, Sonoma Valley Water Agency

2. Water Use Efficiency and Recycled Water – Biagtan

The Water Conservation Executive Order B-37-16 relates to long term water use. There is a new target approach being developed to achieve more savings than the 20 percent by 2020 that is required by [SBX7-7](#), and to account for standards for indoor and outdoor efficiency (55 gal per capita/day indoor). The outdoor standards are based on model evapotranspiration (ET) factor, performance measures from CII sector, and performance measures for water loss. The recycled water community want recycled water to be counted as 100% conservation because it offsets potable water use and thus should not need to meet the conservation target. The State feels that tertiary recycled water needs to meet the same requirements as potable water, would be given an ET adjustment factor of 1, and would not be considered differently than other potable sources. BACWA's Recycled Water committee is concerned with the requirement that landscape areas irrigated with recycled water are included in the outdoor water use targets, and supplied a [comment letter](#) on the draft document implementing the Executive order, entitled "[Making Conservation a Way of Life](#)". Since there are already strict prohibitions on recycled water producers and users to prevent the release of recycled water into the environment. Including areas irrigated with recycled water into the targets effectively applies a second set of runoff prohibitions on these areas, this would be a disincentive to expanding the use of recycled water to offset potable water for irrigation. Furthermore, when urban water agencies receive credit for converting irrigated areas to recycled water, it promotes the expansion of recycled water into urban areas. WateReuse also supplied [comments](#) on the document.

3. Recycled Water "Highlights" for the BACWA Annual Meeting – Fono

The committee discussed possible topics of discussion for Rhodora Biagtan during the Recycled Water session at the BACWA Annual members meeting on 1/27:

- a. State General Orders
- b. Recycled Water Policy
- c. Potable Reuse

d. Survey

4. BACWA Recycled Water Survey – Fono

Lorien Fono is following up with agencies to ensure that all facilities covered by the Nutrient Watershed permit submit their Recycled Water Survey to HDR. She will also touch base with State Water Board staff about their survey, and their data gathering and analysis. Some members reported that the State Water Board form is confusing and many questions are unclear. Peter Vorster of the Bay Institute has gone through the effort of data analysis for recycled water use through the State of the Estuary, and may be able to offer insight on how to do the calculations. We should make sure that BACWA's numbers are somewhat consistent with those developed by the State Water Board. There was a discussion about developing a BACWA product to share the information on recycled water with member agencies and regulators.

5. Federal Funding Opportunity - Water Infrastructure Improvements for the Nation (WIIN) Act – Biagtan/Fono

The "Water Infrastructure Improvements for the Nation Act" (WIIN Act) (S. 612) was approved in December. It includes the California drought relief bill, authorizes Corps of Engineers projects and policies, and contains other Western natural resources items. Specifically related to water recycling are: The bill also authorizes \$50 million for new, unauthorized water reuse and recycling projects. The bill requires a project to have a completed feasibility study and the Secretary must make a determination that the project is technically and financially feasible. Within 180 days of receipt of a feasibility study, the Secretary is required to submit a report to the Senate Energy and Natural Resources Committee and the House Committee on Natural Resources describing the result of the Secretary's review of the feasibility study, including any recommended changes to the proposed project. The bill directs the Secretary to give priority to water reuse projects that have experienced drought or having been designated a disaster areas within the last four years and to projects that: - are likely to provide a more reliable water supply for States and local governments; - increase water management flexibility and reduce impacts on environmental resources; and - are regional, with multiple stakeholders and provide multiple benefits including water supply reliability, ecosystem benefits, groundwater management and enhancements, and water quality improvements. Finally, in order to receive funds a project must be earmarked in the Energy and Water Development Appropriations Act, after the Secretary submits a recommendation to the appropriate committees to fund the reuse project. WaterSMART: The bill provides an additional \$100 million for WaterSMART, \$50 million of which is designated to water supply and conservation activities on the Colorado River. The additional funds will allow Reclamation to continue to expand the size and scope of competitive WaterSMART grants.

(Added after the meeting) Update on D.C. activity: Sante has been busy connecting with many, including recent conversations with several from the Bureau of Reclamation. Please note these are preliminary discussions - - being provided for your information - - based on best information available at this time.

Sante had a conversation with Grayford Payne, USBR Deputy Commissioner for Policy, Administration and Budget, regarding the "New Water Recycling and Reuse Projects" grant program in WIIN and timing for Reclamation to issue new guidelines (WIIN specified that guidelines for feasibility studies be issued within 60 days of enactment = Feb. 16). He was directed to speak with staff in the Denver office, as they are directly responsible for Title XVI and other WaterSMART funding programs. He did connect with staff, and was told the following (in brief):

- Their goal is to meet the February deadline.
- There won't be a public comment period unless they make substantial changes (such as to the current Directives & Standards, etc.).
- They don't really want new study guidelines – or not to accept studies already determined feasible – because they don't have the staff to revisit these projects (40+ studies).

- **Each project that has already received feasibility approval will be receiving a letter requesting the current status of the project and asking if the sponsor wants the project to be included in the report to Congress** (as per the new WIIN law). [This is a very positive response that we look forward to seeing implemented.]
- Deciding which projects ultimately get funding (\$50 M in WIIN) will be based on Reclamation competitive ranking of the application/information submitted - - which they anticipate will be similar content & process to current Title XVI and WaterSMART funding applications (WIIN contains some additional criteria/priorities).

6. Building Standards for Recycled Water Systems (AB 2282) – Olson

Agencies are looking at potable reuse as part of their water supply. El Dorado irrigation district provided comments, saying that they need to do cross connection tests for every home, which is staff intensive. Below are the comments that Stefanie Olson submitted to the Building Standards Commission/Housing and Community Development (BSC/HCD) on behalf of DSRSD.

- The dual plumbed definition is to be removed since their definition conflicts with Title 22's definition.
- The word "supply" should not be used when referring to the onsite recycled water system. "Supply" generally refers supply side prior to the customer's meter.
- The increase in horizontal separation from 4 feet to 5 feet. The DDW's Memo 2003-02 was provided to the BSC/HCD which states, 4-foot horizontal separation for main and pipelines conveying recycled water.
- Currently requires tank type toilets to use signage with the following wording, "not suitable for human contact". This is inaccurate and in conflict with Title 17 and 22, which allows tertiary treated recycled water to be used within toilets and is safe for human contact. Title 17, allows tertiary treated recycled water for non-restricted recreational impoundments and industrial process water that may be contacted by workers.
- Following issues were submitted:
 - Centralized recycled water treatment facilities have limited supplies of recycled water and agencies have developed a priority list of recycled water based on highest consumption, such as commercial landscape irrigation and other industrial and commercial uses. Indoor use of toilet and urinal flushing, whether residential and commercial may not be considered highest consumption uses, especially since new constructions is required to install ultra-low flow fixtures.
 - Many centralized recycled water agencies are now looking into using recycled water as an alternative water supply through potable reuse.
 - If centralized recycled water agencies run out of wastewater to produce recycled water, potable water may utilized to supplement. This defeats the purpose of AB 2282, water conservation.
- In addition, recycled water service can be interrupted at times for system maintenance or treatment disruptions
- Draft language states onsite graywater shall be installed in new nonresidential occupancies in jurisdictions that do not have access to recycled water from a local water purveyor. District recommends an exception for service areas where sewer flows are being utilized by a centralized recycled water treatment facilities for high-use recycled water projects or as a planned alternative water supply through potable reuse.

Stefanie also thought that the comments provided by other agencies were valuable. The El Dorado Irrigation District representative made comments regarding their program that have over 4,000 residential homes using recycled water for outdoor irrigation and the issues they run into performing cross connection tests and backflow testing, without having to gain access into the homes. If recycled water was brought into residential homes, it would be extremely difficult and very staff intensive for water agencies to regulate since agencies would be required to gain access into homes routinely to perform cross connection tests of all water fixtures and conduct inspections.

7. [Recycled Water General Order 2016](#) -- Roa

A subcommittee made up of Recycled Water Committee members will develop recommendations on the transition to the State Recycled Water General Order from 96-011. BACWA will deliver these recommendations to the Regional Water Board. Agencies will need to submit only the missing parts from the State General Order engineering report requirements, rather than redoing the reports in their entirety. The subcommittee will meet early in March to kick off this process. The committee can present findings at BACWA's March 9 joint meeting with the Regional Water Board staff.

8. Revisions to [Recycled Water Policy](#) –Munoz

After the December state Water Board meeting, there were amendments to the original resolution moving the deadline up to March 2018 and providing stronger language in support of potable water reuse. The State Water Board does not yet have a timeline for the stakeholder outreach process but they are hoping to have a kickoff meeting in the next few months. (Edited after the meeting to add: the meeting with State Water Board staff is scheduled for March 7).

9. Direct Potable Reuse-Biagtan

[Draft Direct Potable Reuse Report](#)
[DDW Briefing on DPR](#)

State Water Board delivered report on Direct Potable Reuse Criteria feasibility to the legislature in December. The State Water Board currently plans to permit DPR on a case-by-case basis. They are not planning to create new regulations to monitor feed water (wastewater) quality for producing potable recycled water. [Comments](#) were provided by Association Coalition made up of ACWA, CASA, CA-NV AWWA, CUWA, CWEA, and WateReuse.

10. Legislation and Regulatory Update –Muñoz/Hu

a. Active Legislation

SB5 (DeLeon) - Includes funding for recycled water through a bond.

Darrin Polhemus was just appointed to the post of Deputy Director of the Division of Drinking Water. Previous, he worked in the Division of Financial Assistance, as well as the Division of Water Quality, and participated in the transition of the Division of Drinking water from DPH to the State Water Board.

Next Meeting

March 1, 2017 from 10:00 am to 12:00 pm, 2nd Floor Small Training Room (to be confirmed) at EBMUD Headquarters.