



Amended Recycled Water Policy

LEAH WALKER
CITY OF PETALUMA

Background

- ▶ Original Policy adopted in 2009
- ▶ Amended in 2013 to include monitoring for CECs
 - ▶ Constituents of Emerging Concern
 - ▶ Based on 2010 Science Advisory Panel recommendations
- ▶ Current update intended to
 - ▶ Support expansion of recycled water
 - ▶ Reflect regulatory changes
 - ▶ Update CEC monitoring requirements
 - ▶ “Clarify, streamline and provide statewide consistency”

Summary of Key Changes

- ▶ Remove statewide mandates, but retain Recycled Water goals
- ▶ Establish a goal to minimize discharges to enclosed bays, estuaries, coastal lagoons, and ocean waters
- ▶ Require RW Producers to report production and use data to State Board
- ▶ Require treatment plants to report influent, treatment level, and volumes discharged
- ▶ Require RW projects to comply with Water Code Section 1211
 - ▶ If a recycled water project will decrease the amount of water in a stream or other waterway, the owner of the wastewater treatment plant needs to file a wastewater change petition with the Division of Water Rights
- ▶ Requirements for Salt and Nutrient Management Plans
- ▶ Remove requirement to monitor primary pollutants for landscape irrigation
- ▶ Update CEC monitoring requirements
- ▶ Terminate regional water board general orders

Policy Issues

- ▶ BACWA, WaterReuse and CASA actively engaged in review, comment and negotiation with State Water Board
- ▶ Recycled Water Industry primary issues
 1. Goal to minimize discharges to ocean, bays and estuaries implies a priority on recycled water projects in coastal areas
 - ▶ Does not account for the cost-effectiveness and feasibility and other site-specific conditions across jurisdictions
 - ▶ Leaves out other reuse priorities, such as expanding inland recycled water
 2. Expansion of Water Code Section 1211 compliance to all RW projects is likely to impede the progress of recycled water projects
 - ▶ There is already a significant backlog in the Division of Water Rights
 3. Bioassays required for potable reuse projects with response actions
 - ▶ It is premature to require response actions when the monitoring technology is not sufficiently standardized

Implementation Issues for BACWA Members

- ▶ Member agencies may be impacted by the following issues
 1. Termination of Regional Recycled Water permit number 96-011
 2. Wastewater Change Petitions
 3. Permitting of Satellite/Scalping Plants

Termination of Permit Number 96-011

- ▶ More than 25 agencies in the Bay Area are enrolled under the Regional Board's general order
- ▶ **All 96-011 permittees will be required to enroll under the new State General Order for recycled water**
- ▶ Regional Water Board must transition agencies within
 - ▶ **3 years** for agencies with Title 22 Engineering reports prior to 2001
 - ▶ **1 year** for agencies with Engineering Reports for 2001 or later
- ▶ **Recycled Water programs with individual permits from the Regional Water Board are not affected**
- ▶ Regional Board is planning a “group transition” for all 96-011 enrollees
 - ▶ Each enrollee must ensure the Regional Board has scanned copies of required documents

Wastewater Change Petitions

- ▶ All RW projects must comply with Water Code Section 1211
- ▶ If a RW project will decrease the amount of water in a stream or other waterway at all, a wastewater change petition must be considered
- ▶ The current process to submit, review and authorize petitions is not streamlined
- ▶ Reviews by Fish & Wildlife can cause substantial delays
- ▶ Even when F&W has no issues, the process is complex
- ▶ North Coast Instream Flow Policy further complicates the process
- ▶ Agencies should think programmatically and not submit petitions project by project
- ▶ Early consultation with Division of Water Rights staff recommended
- ▶ State Water Board “committed” to developing a more transparent, streamlined process

Permits for Satellite/Scalping Plants

- ▶ The statewide General Order does not include treatment specifications
- ▶ Recycled water producers seeking coverage under the General Order “generally” would also need a separate NPDES permit or WDRs for the production of recycled water
- ▶ State Water Board staff suggest these options
 - ▶ Regional Water Boards could issue master reclamation permits and the facilities would not seek coverage under the State General Order
 - ▶ State Water Board would amend the State General Order
 - ▶ State Water Board would develop a General Order for scalping plants

QUESTIONS?