

# Recycled Water Committee

October 21, 2025



**B A C W A**  
**B A Y A R E A**  
**C L E A N W A T E R**  
**A G E N C I E S**

# Agenda *for* October 2025 BACWA Recycled Water Committee

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1. Introductions
2. Presentation on the Pure Water Silicon Valley DPR Demonstration Facility Project
3. Update on Funding Opportunities
4. Roundtable Discussion on Inspections of Irrigation Sites
5. BACWA Updates
6. Legislative and Regulatory Updates
7. Proposed 2026 Meeting Dates
8. Other Announcements



# Recycled Water Irrigation User Site Inspections

BACWA Recycled Water Committee

Stefanie Olson

# Recycled Water Use Regulations

- 2016 State Order and NOA
- Title 22 (22 CCR), division 4, chapter 3 (Statewide Recycling Criteria)
- Title 22 Engineering Report
- State Recycled Water Policy

# Region 2 Administrator

- Administrator
  - 2016 State Order applicants
  - State General Order delegates most responsibilities for administering water recycling programs to the applicants as “administrator.”
- Administrator duties
  - Program oversight
  - Maintain T-22 Engineering report
  - Obtain written approval for changes (e.g., new uses, treatment)
  - Issue Use Permits
  - Train personnel on operations, safety, and compliance

# Regional Board Periodic Inspection Clarification

- Can Administrators pass on the periodic site inspection requirement to the user?
- Regional Board Response:
  - The State Order 2016-0068-DDW, section C.8 does require the administrator to perform periodic inspections in addition to the self-monitoring to ensure compliance with the use permit and the State Order. That inspection can be delegated to a third party, but it cannot be delegated to users.

# Administrator Use Area Oversight

- Conduct periodic inspections to verify compliance
- Ensure proper signage in use areas
- Prevent runoff and nuisance (monitor for ponding, odors, off-site discharges and take corrective actions if necessary)
- Prevent cross connections with drinking water system

# Periodic Inspection Information Sharing

Is there interest in sharing periodic site inspection protocol?

Administrators	# of Sites	Periodic Inspection Schedule	Is User Staff Present	Irrigation system turned on?	User Self-Monitoring Frequency	Inspection Window
Dublin San Ramon Services District	360	Schools/Parks - Annual; Commcials - every two years; streetscapes/medians every three years	Yes	Yes	Quarterly	April – October
EBMUD						
CCCSD						
South Bay Water Recycling						
City of Hayward						
Marin Water						
City of Livermore						
City of Pleasanton						
Redwood City						

# 5. BACWA Updates

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## **Nutrients Watershed Permit – Basin Plan Amendment**

- Purpose: Supersede certain sections of the state's 2008 Compliance Schedule Policy to provide a pathway for compliance schedules longer than 10 years for “qualifying projects” (including recycled water)
- Regional Water Board has provided BACWA with a preliminary draft
- Next Steps:
  - BACWA to submit comments on preliminary draft soon (after November 5<sup>th</sup> Nutrient Strategy Team meeting)
  - After that: Develop / negotiate public draft version of Basin Plan Amendment; CEQA; Staff report may contain information about qualifying projects
  - BACWA will assist with information needed for staff report

## 5. BACWA Updates

### Nutrients Watershed Permit - Reporting

The next BACWA Request for Information (RFI) for the 2026 Group Annual Report will include questions about plans for nutrient reduction via recycled water:

- Draft RFI - December 2025
- Final RFI – January 2026
- Information will be due February 13, 2026

**Table 5. Compliance Schedule Milestones**

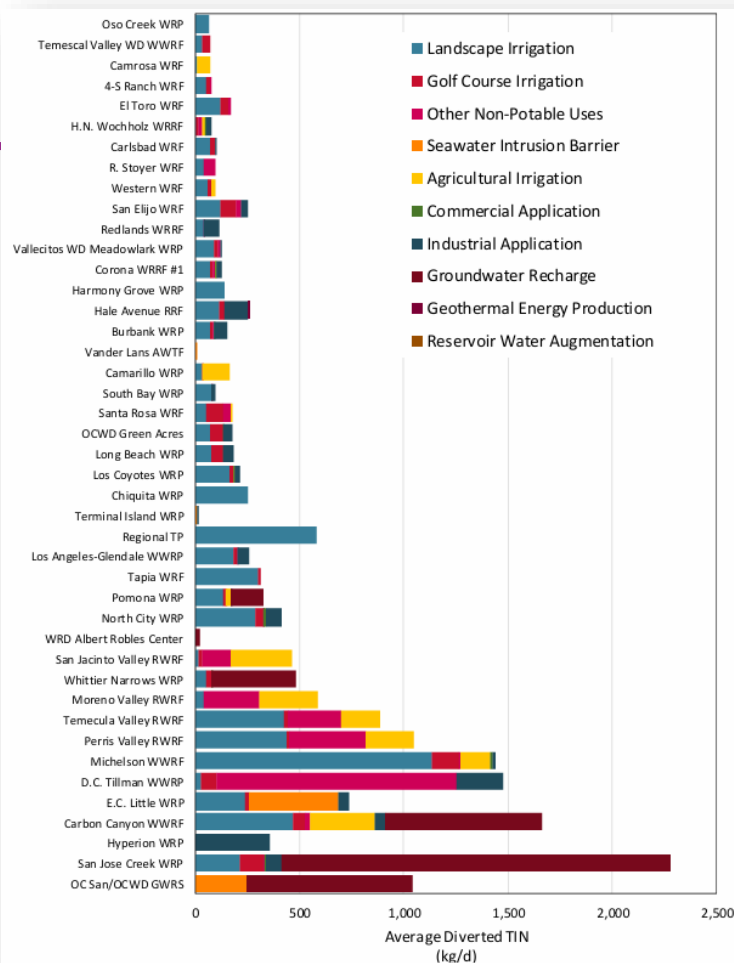
Milestone	Compliance Date
<p><b>Identify Compliance Alternatives.</b> Dischargers shall identify preliminary alternatives for meeting the final effluent limitations in Table 4. This may include traditional treatment infrastructure, optimization, nature-based solutions, recycled water, trading, or a combination thereof. The submittal shall note whether the identified alternatives require pilot projects.</p> <p>If a Discharger has already identified a compliance pathway (selected alternative or combination of alternatives), the Discharger shall instead describe the compliance pathway, begin implementation, and provide a status update.</p>	April 1, 2025
<p><b>Perform Alternatives Analysis.</b> Dischargers shall evaluate the compliance alternatives and identify which alternative or combination of alternatives (i.e., compliance pathway) best achieves compliance with the final effluent limitations in Table 4.</p> <p>If a Discharger has already identified a compliance pathway, the Discharger shall provide a status update regarding implementation.</p> <p>If a Discharger plans to meet the final effluent limits in Table 4 solely or in part through treatment optimization, it shall include a schedule to complete the optimization portion of the work no later than May 1, 2028, and begin implementation in accordance with its schedule.</p>	April 1, 2026
<p><b>Submit Compliance Plan.</b> Dischargers shall describe proposed improvements and provide an implementation schedule for major milestones for the compliance pathway identified above, including a schedule for design and construction of improvements.</p> <p>If a Discharger chooses to implement a Multi-Benefit Solution consistent with Provision 6.3.5, it shall submit a governance plan that documents partnerships and a memorandum of understanding or agreement among parties to implement nature-based solutions (e.g., land ownership and funding partnerships) or wastewater recycling (e.g., agreement between wastewater agencies, water purification entity, water contractors).</p>	April 1, 2027 <sup>[1]</sup>

## 5. BACWA Updates

### Coastal Nutrients Update

Southern California and Central California wastewater agencies are working with CASA and HDR on quantifying current loads and estimating the magnitude, cost, and timing of potential nutrient load reductions to the Pacific Ocean

- Analysis for Southern California Bight is now complete (see figure)
- Analysis for Central Coast – Response to CASA/HDR Request for Information is due November 21



## 5. BACWA Updates

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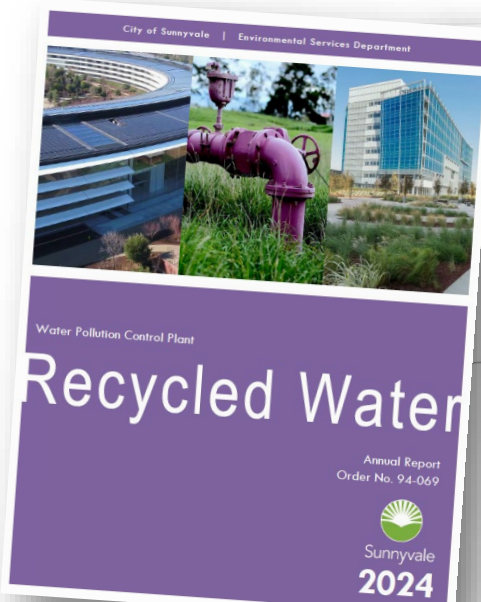
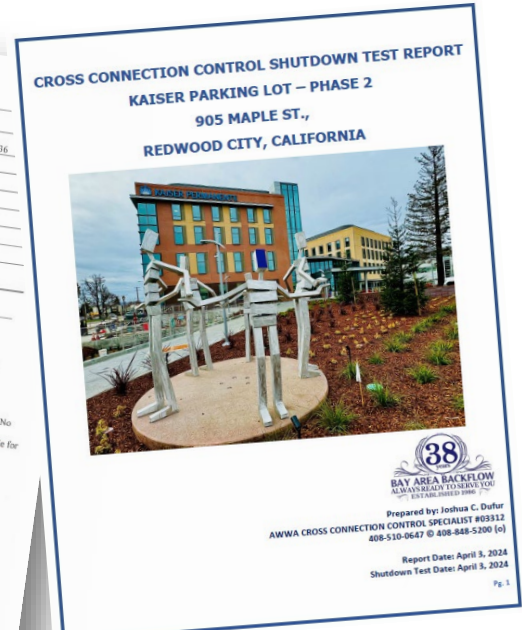
### **Communications Update**

- BACWA is planning an outreach event at the Exploratorium “After Dark” – Contact Lorien if your agency would like to participate (staff, exhibits)
- PFAS Forum scheduled for November 18 – Registration Link coming soon

# 5. BACWA Updates

## Annual Reports

- See link in agenda – use this resource to reach out to your peers!

This is a "Water Recycling Site Inspection Form" from NSMCS, a subsidiary of the City of Daly City. It includes fields for Customer Number, Date (8/22/25), Site Name (East John Daly), Site Address (35 DeLong St), Inspected by (Jeff Templin), Title (PW Maintenance Supervisor), and Type of Inspection (ANNUAL). The form contains a checklist of 9 items related to recycled water use, with checkboxes for "Yes" and "No". Some items are marked with "X" for "Yes". The form also has a section for "Standard On-Site (Land) Observation Report" and a "Signature" line at the bottom.

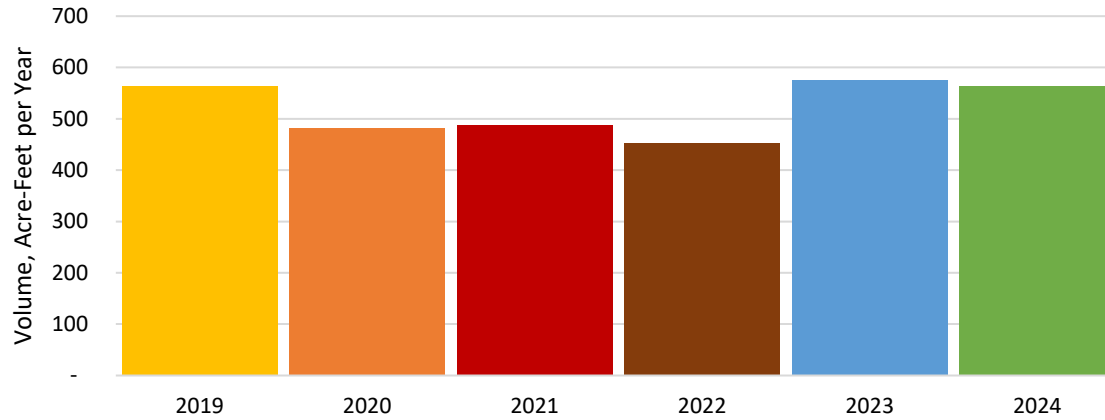
## 5. BACWA Updates

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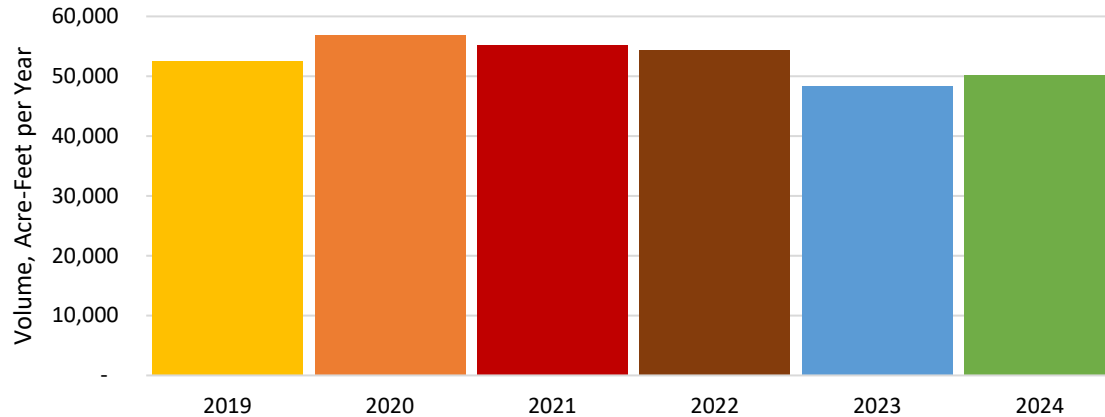
### **Volumetric Annual Reporting**

- 2024 data now available
- Continuing trend:  
wetter years have lower demand for recycled water
- State Water Board may not produce graphical summaries this year

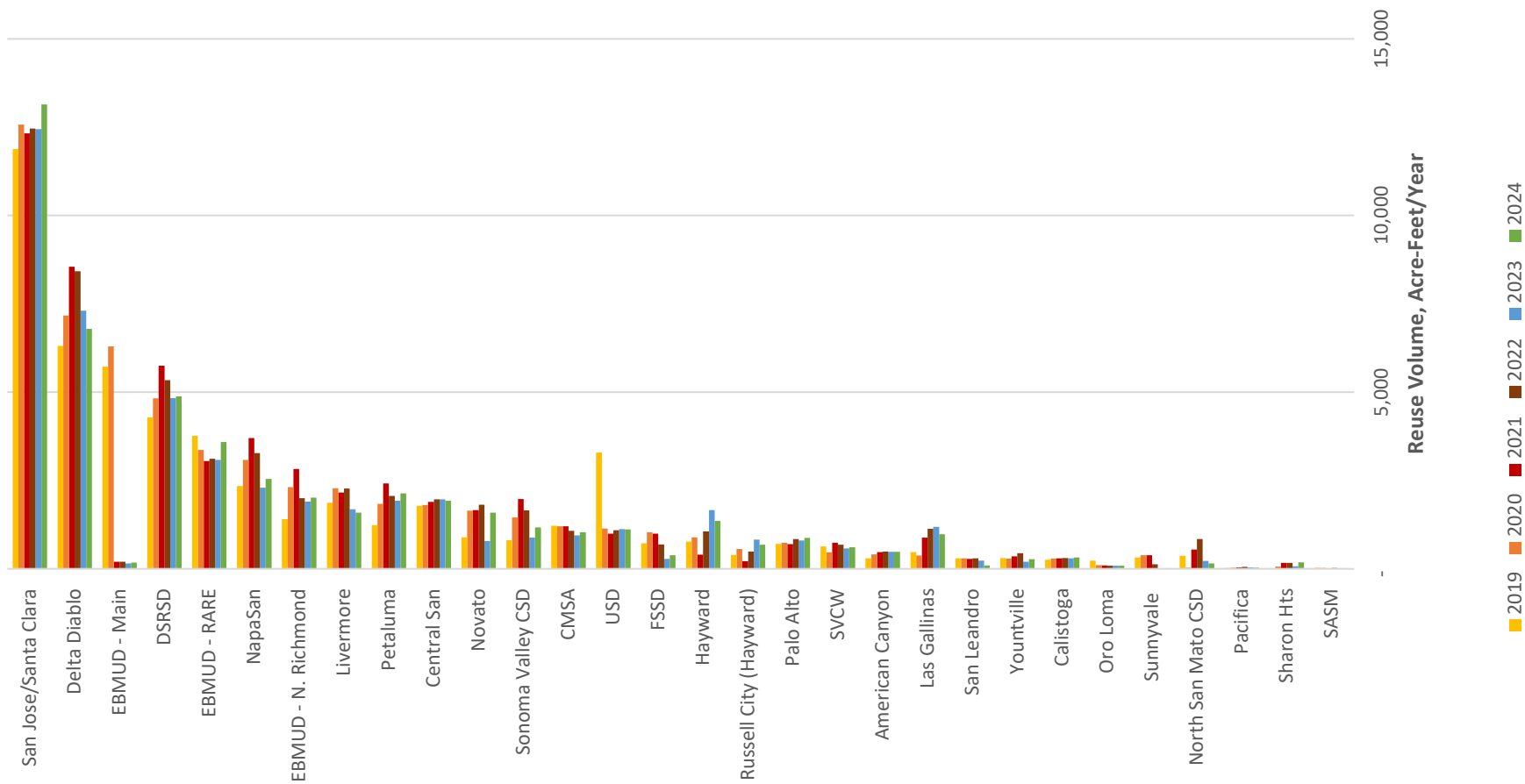
### Influent in Region 2



### Recycled Water Production in Region 2



# Bay Area Recycled Water Production by Facility, 2019-2024



## 6. Legislative and Regulatory Updates

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- Update on Onsite Non-potable Reuse regulation rulemaking
  - 15-day comment period in August
  - Many BACWA comments were accepted!
    - Sewer service providers can now specify elements that need to go into the Engineering Report (for example, technical details related to automated diversions or solids return streams)
    - Sewer service providers will now receive the commissioning report
    - More local flexibility was granted on signage.
- State Water Board adoption hearing slated for November 18th

## 6. Legislative and Regulatory Updates

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- SB 31 was signed by the Governor and changes Title 22:

<b>Parks</b> Incidental spray, mist, or runoff from disinfected tertiary recycled water can enter outdoor eating areas	<b>Decorative Water Bodies</b> Recycled water discharged from an impoundment during storm events is not an unauthorized discharge
<b>Condos / HOAs</b> Outdoor residential irrigation will not trigger dual-plumbing rules, only indoor dual-plumbing.	<b>Food Handling Facilities</b> Allows disinfected tertiary recycled water for toilet flushing or outdoor irrigation in and around food handling facilities

