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Director

State of California—Health and Human Services Agency
California Department of Public Health



ARNOLD SCHWARZENEGGER
Governor

December 7, 2009

Ms. Marsi Steirer
Deputy Director
City of San Diego Water Department
600 B Street, Suite 600
San Diego, CA 92101

Dear Ms. Steirer:

National Water Research Institute (NWRI) INDEPENDENT ADVISORY PANEL
REPORT REGARDING THE CITY OF SAN DIEGO INDIRECT POTABLE
REUSE/RESERVOIR AUGMENTATION (IPR/RA) DEMONSTRATION PROJECT

The California Department of Public Health (CDPH), Division of Drinking Water and Environmental Management (Department), has reviewed the subject report based on a meeting of the Independent Advisory Panel (IAP) meeting held May 11-12, 2009. The Department appreciates the invitation and opportunity to participate as an observer at the meeting of the IAP. As the City of San Diego's (City) Indirect Potable Reuse/Reservoir Augmentation (IPR/RA) Demonstration Project is considered, the Department is concurrently embarking on our discussions as to the regulatory development requirements for indirect potable reuse/reservoir augmentation projects.

The Department anticipates an in-house development period of at least one year before a draft will be ready to be presented to a stakeholder group for comment and consideration. We envision a stakeholder process similar to the one used for the current draft groundwater recharge regulations. In addition, there are several issues, such as the acceptable level of total organic carbon in the water, time to identify and respond to chemical and microbiological excursions, along with residence time in the reservoir that must be addressed before the draft regulations can be completed. Reviewing your proposal will assist the Department in coming to a decision on some of the issues as it had done for the groundwater recharge regulations.

As the City moves forward with the demonstration project there will be the need for the Department to establish operational or permit requirements for a reservoir augmentation system. There are also several outstanding technical issues related to the subject of surface water augmentation that the demonstration project will need to address, such as the level of advanced treatment necessary along with appropriate monitoring and

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contingency plans. It is the Department's desire to see these issues dealt with in a technically sound manner to ensure the public policy developed for this project is technically defensible and is protective of public health.

The Department will need to review and comment on the City's engineering report for the demonstration project which will need to include a monitoring plan. This report should be submitted to the Department for review and comment prior to construction. In the engineering report, please address the comments outlined in the enclosure to this letter.

Prior to embarking on IPR/RA plans, it would be prudent for the City to focus its efforts on the completion of surface water treatment upgrades needed at their Alvarado and Otay drinking water treatment plants since these plants have outstanding compliance orders for necessary upgrades to meet existing surface water treatment regulations. Given the infrastructure and transmission improvement projects in San Diego County area, it is the Department's understanding these improvements will enable water from San Vicente Reservoir to be utilized as raw source water for other downstream public water systems, such as the Helix Water District and the Otay Water District. It is recommended that any treatment plant that could receive San Vicente raw water also be included in the evaluation for assessment of multi-barrier treatment and compliance with the Department's requirements for IPR/RA. This should also be addressed in the submitted engineering report.

Should you have any questions regarding the content of this letter, please feel free to contact me at (916) 449-5577.

Sincerely,



Gary H. Yamamoto, P.E., Chief
Division of Drinking Water
and Environmental Management

Enclosure: CDPH Detailed Comments on NWRI IAP IPR/RA Demonstration Project Report

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