

Regulations & Permitting Working Group Report

Ron Doba, Chair

Tom Buschatzke, Co-Chair

Michele Robertson, Staff Liaison

5/7/2010

Tasks Assigned by BRP

- Identify regulatory impediments and make recommendations to streamline the reuse of reclaimed water with regards to the following:
 - BADCT for sewage treatment plants
 - Reclaimed water standards, monitoring, and allowable end uses
 - ADEQ and ADWR permitting processes
 - Gray water

Membership

- As of 4/28/10, 57 persons have asked to be on the Regulations & Permitting Working Group
- The March 24th Working Group meeting was attended by 28 persons
- The April 28th Working Group meeting was attended by 21 persons

Strategy

- Three subcommittees have been formed to simultaneously work on the tasks
 - Permitting & BADCT (Michele Robertson)
 - Reclaimed water standards, monitoring, and allowable end uses (Tom Buschatzke)
 - Gray water (Ron Doba)

Working Group Meetings

- February 17, 2010
- March 24, 2010
- April 28, 2010
- May 26, 2010 (scheduled)

Subcommittee Meetings

- Permitting Subcommittee
 - 4/22/2010
 - 4/28/2010
- Reclaimed Water Quality Subcommittee
 - 4/12/2010
 - 4/28/2010
- Gray Water Subcommittee
 - 4/14/2010
 - 4/28/2010

Subcommittee Tasks and Objectives/Expectations

- Review applicable rules pertaining to task
- Determine issues that need to be addressed
- Prioritize issues
- Determine additional information requirements
- Determine how issues can be addressed

Emerging Areas of Focus

- Permitting
 - 15 issues have been identified of which 4-5 can be addressed by policies
 - Need a common measurement method between ADEQ & ADWR to better identify how much reuse is actually taking place and ensure all reuse is being captured
 - Permitting for riparian and habitat restoration, limits and process should be evaluated

Emerging Areas of Focus

- Permitting (cont.)
 - Gray areas between Reuse and AZPDES need to be defined and clarified (example: irrigating in a floodway requires an AZPDES permit)
 - Still refining issues, next meeting 5/13/2010 at ADEQ

Emerging Areas of Focus

- Reclaimed Water Quality
 - Began with 34 issues, now focusing on 7
 - Gray areas between Reuse and AZPDES need to be defined and clarified (where does one stop and the other begin?)
 - A need exists for a reuse category that covers all uses, including direct potable
 - A strategy to gain acceptance of direct potable reuse is needed

Emerging Areas of Focus

- Reclaimed Water Quality (cont.)
 - The emerging contaminant issue needs to be addressed and resolved
 - Salinity requirements should be left to resolve between the water provider and the end user
 - Water quality standards need to be reviewed for appropriateness
 - The fecal coliform rule and BADCT need to be in conformance

Emerging Areas of Focus

- Reclaimed Water Quality (cont.)
 - Define when reclaimed water stops being reclaimed water and becomes another water
 - Need to be able to combine reclaimed water with other remediated water for reuse purposes

Emerging Areas of Focus

■ Gray Water

- Initially identified 23 issues, 10 have been removed from consideration and several of the remaining 13 are gray water permit related
- Several issues focus on the differentiation made in the permitting process between customer classes vs. lot size

Emerging Areas of Focus

- Gray Water (cont.)
 - There is a need for education and training when it comes to gray water
 - Existing incentives for gray water systems are under utilized
 - Public potable water systems should be protected from gray water systems
 - Allowable uses of gray water should be expanded

Subcommittee Review Material

- *BADCAT & Permitting Processes*
 - R18-9-B201 to B206
BADCT for Sewage Treatment Facilities
 - R18-9-701 to 720
Direct Reuse of Reclaimed Water
- *Reclaimed Water Quality Standards, Monitoring, End Uses*
 - R18-11-301 to 309
Reclaimed Water Quality Standards
 - R18-9-601 to 603
Reclaimed Water Conveyances

Subcommittee Review Material

■ *Gray Water*

- Recommendations to IAMPO on Pipe Color Code to Convey On-site Alternative Waters
- White Paper on Graywater, 11/9/2009, AWWA, WEF, WaterReuse
- R18-9-701 to 720 Direct Reuse of Reclaimed Water
- Technical Memorandum on Graywater, 2/13/2009, Clean Water Coalition, Southern Nevada Water Authority
- Greywater Policy Packet, 2005, Oasis Designs
- Long-term Effects of Landscape Irrigation Using Household Graywater – Literature Review and Synthesis, 2006, WERF

Subcommittee Review Material

- Florida Department of Environmental Protection letter to IAPMO regarding UPC pipe color revisions, 10/16/2008
- IAPMO letter to Florida Department of Environmental Protection, 11/21/2008
- Florida Department of Environmental Protection letter to IAPMO regarding UPC pipe color revisions, 1/29/2010
- LEED for Homes Reference Guide

Next Meetings

- Reclaimed Water Quality Subcommittee
 - 5/10/2010, ADEQ
- Gray Water Subcommittee
 - 5/12/2010, ADEQ
- Permitting Subcommittee
 - 5/13/2010, ADEQ
- Regulations & Permitting Working Group
 - 5/26/2010, ADEQ