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**North Coast Regional Water Quality Control Board**

July 1, 2016

Mr. Patrick Fuss  
City of Healdsburg  
401 Grove Street  
Healdsburg, CA 95448  
[pfuss@ci.healdsburg.ca.us](mailto:pfuss@ci.healdsburg.ca.us)

**NOTICE OF APPLICABILITY**

**ORDER WQ 2014-0090-DWQ-R1001-01  
(applicable through August 5, 2016)**

**and**

**ORDER WQ 2016-0068-DDW-R1001  
(effective on and after August 6, 2016)**

**WDID NO. 1B15092RSON**

**STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0090-DWQ  
GENERAL WASTE DISCHARGE REQUIREMENTS FOR RECYCLED WATER USE  
AND  
STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2016-0068-DDW  
GENERAL WATER RECLAMATION REQUIREMENTS FOR RECYCLED WATER USE**

**CITY OF HEALDSBURG  
RECYCLED WATER PROGRAM  
SONOMA COUNTY**

**A. General Information and Requirements**

This document describes the City of Healdsburg's (hereinafter City) Recycled Water Program and outlines requirements for the City's Recycled Water Program under State Water Resources Control Board (State Water Board) Orders WQ 2014-0090-

DWQ (Attachment A to this NOA), adopted June 3, 2014, and WQ 2016-0068-DDW (Attachment B to this NOA), adopted June 7, 2016, and effective August 6, 2016. These Orders regulate the use of recycled water for all title 22 uses except groundwater replenishment. Coverage under Order WQ 2014-0090-DWQ is for the period July 1, 2016 through August 5, 2016. Coverage under Order WQ 2016-0068-DDW is effective on and after August 6, 2016. Both orders (and any future revisions) are hereinafter referred to as the General Order.

The General Order delegates the responsibility of administering water recycling programs to a designated Administrator to the fullest extent possible. The City of Healdsburg will act as the Administrator of the City's Recycled Water Program and is hereinafter referred to as the Administrator.

Please review this Notice of Applicability (NOA) carefully to ensure that it completely and accurately reflects the proposed Recycled Water Program. If the use of recycled water violates any of the terms or conditions in this NOA, the Regional Water Board may take enforcement action, including the assessment of administrative civil liability. Failure to abide by the conditions of the General Order, including its monitoring and reporting requirements, and this letter authorizing applicability could result in enforcement actions, as authorized by provisions of the California Water Code.

The required annual fee specified in the annual billing from the State Water Board shall be paid until this NOA is officially terminated. The Administrator must submit in writing a Notice of Termination if the water recycling program covered by this NOA is discontinued.

For the time periods specified below, please include the indicated information in the Subject line of all future correspondence related to this enrollment:

Between July 1, 2016 and August 5, 2016: Notice of Applicability No. WQ-2014-0090-R1001-01 and WDID No. 1B15092RSON

After August 5, 2016: Notice of Applicability No. WQ-2016-0068-R1001 and WDID No. 1B15092RSON

## **B. Background Information**

The North Coast Regional Water Quality Control Board (Regional Water Board) staff reviewed the Administrator's May 5, 2016, Recycled Water Program Technical Report and Amended Notice of Intent (NOI). The NOI was submitted to apply for regulatory coverage of the Administrator's entire recycled water program under the General Order. The NOI expands upon an NOI that was submitted by the City on July 13, 2015, and approved by NOA WQ-2014-0090-R1001 issued by the Regional Water Board Executive Officer on July 15, 2015, to authorize enrollment of the Administrator's Landscape Irrigation Recycled Water Program. On July 16, 2015, the

City submitted the required filing fee of \$2,088 and will be assessed an annual filing fee annually thereafter.

Prior to the issuance of this NOA (WQ-2014-0090-R1001-01/WQ-2016-0068-R1001), the Administrator's recycled program has been permitted as follows:

1. Portions of the City's vineyard irrigation program that were identified in the City's *Final Environmental Impact Report, City of Healdsburg Wastewater Treatment Plant Upgrade Project* (FEIR), June 13, 2005, and for which a recycled water pipeline had been constructed, were permitted through Waste Discharge Requirements Order No. R1-2010-0034.
2. Trucking to provide recycled water for soil compaction, dust control, and other construction purposes was approved under Resolution No. R1-2012-0099, *Policy for Waiving Waste Discharge Requirements for Specific Types of Waste Discharge*, by a letter from the Regional Water Board Executive Officer dated March 12, 2014.
3. Trucking to provide recycled water to vineyards addressed in the 2005 FEIR where a recycled water pipeline has not been constructed, was approved under Order No. R1-2010-0034 for the 2014 and 2015 irrigation seasons only, by a letter from the Regional Water Board Executive Officer dated May 1, 2014.
4. Trucking to provide recycled water to vineyards in the Alexander, Dry Creek, and Russian River Valleys at sites included in the City's *Addendum to Final Environmental Impact Report, City of Healdsburg Wastewater Treatment Plant Upgrade/Seasonal Irrigation Reuse Project*, April 2014 was approved under Order No. R1-2010-0034 for the 2014 and 2015 irrigation seasons only, by a letter from the Regional Water Board Executive Officer dated May 6, 2014.
5. Trucking to provide recycled water for landscape irrigation at residences and commercial businesses (self-haulers and commercial haulers) was approved under the General Order by NOA WQ-2014-0090-R1001 issued by the Regional Water Board Executive Officer on July 21, 2015.

The Administrator proposes to expand its recycled water program to include the following additional uses and elements: aggregate processing, fire suppression, sanitary sewer cleaning, and street sweeping. In addition, the Administrator proposes to expand the vineyard irrigation program to a broader area, as addressed in the City's March 21, 2016, addendum to the 2005 FEIR. These uses are described in this NOA.

The Administrator's recycled water uses occur in three Department of Water Resources named alluvial groundwater basins: the Santa Rosa Valley – Healdsburg Area Basin 1-55.02, the Santa Rosa Valley – Santa Rosa Plain Basin 1-55.01, the

Alexander Valley – Alexander Area Basin 1-54.01. In addition, part of the City’s recycled water system is immediately west of Basin 1-55.02 that is not identified by DWR as a named groundwater basin.

The Administrator owns and operates a water recycling facility (WRF) located at 340 Foreman Lane, Healdsburg, California. The WRF is regulated under Waste Discharge Requirements (WDRs) Order No. R1-2010-0034 through July 31, 2016 and Order No. R1-2016-0015 beginning August 1, 2016, which also serves as an NPDES permit (NPDES Permit No. CA0025135) for the discharge of treated municipal wastewater to Basalt Pond, a tributary of the Russian River.

Based on the information provided in the NOI, the Administrator’s recycled water program satisfies the general and specific conditions of the General Order. Therefore, this NOA serves as formal notice that the General Order is applicable to the sites and recycled water uses described below. As the Administrator, the City will be responsible for the administration of the Recycled Water Program authorized pursuant to the General Order, including the requirements of title 22.

The Administrator is the recycled water producer and distributor.

### **C. Wastewater Treatment Facility and Recycled Water Fill Stations**

The Administrator’s WRF includes influent screening and grit removal; biological removal of biochemical oxygen demand (BOD) and nitrogen in aerobic, anoxic, and pre-anoxic basins; membrane bioreactor (MBR) filtration; ultraviolet (UV) light disinfection; and chlorine disinfection. Treated effluent is nitrified and denitrified and meets the title 22 requirements for disinfected tertiary recycled water. Title 22 compliant effluent is stored in a 25 million gallon storage pond prior to being distributed to the recycled water system which consists of a recycled water distribution pipeline and two recycled water fill stations. One recycled water fill station is located at the WRF property at 340 Foreman Lane and the other is located on Kinley Drive, approximately one mile from the WRF. The Administrator adds chlorine, at a minimum dose of 1 mg/L to the recycled water directed to the fill stations.

Each fill station is designed for safe and easy access and includes security features to prevent unauthorized access to the recycled water, signage, and hand wash stations to minimize the potential for inappropriate human contact with the recycled water. Fill stations are also designed to minimize the potential for spills and to capture any spills that do occur and prevent spills to surface waters. The WRF fill station can be accessed only when the Administrator’s employees are present. The Kinley Drive fill station can be accessed anytime by permitted commercial haulers or City vehicles.

## **D. Recycled Water Program**

### **1. Residential/Commercial Landscape Irrigation Recycled Water Trucking Program**

In late summer 2015, the Administrator launched a recycled water use program that allows recycled water to be trucked for landscape irrigation use by individual residential and commercial customers. This program was initiated in response to drought conditions.

Recycled water may be transported and used by the City, residents, and business owners/operators for residential/commercial landscape and garden irrigation at homes, parks, schools, and commercial buildings. Individuals and business owners/operators must sign an agreement with the Administrator and follow program rules listed in the agreement, and attend an annual training presentation.

Training covers the approved title 22 uses, use requirements, agronomic rate requirements, and prohibited uses. Residential customers are given recycled water notice stickers to be placed on all containers that will be used for transporting and/or storing recycled water and commercial haulers are given placards to be placed on all trucks used to haul recycled water.

Residential users are allowed to receive recycled water from designated fill stations during scheduled pickup hours and must complete a log sheet every time they pick up recycled water. Residential customers are required to pick up recycled water from the Foreman Lane fill station, which is manned by the Administrator's operations staff during hours of operation. Commercial haulers delivering more than 300 gallons to a particular site or to a user will act as a distributor and will be required to conduct monthly site inspections to ensure that users are complying with the terms of this authorization. Commercial customers are allowed 24/7 access to either fill station.

### **2. Vineyard Irrigation Program**

The Administrator provides recycled water for micro-irrigation of vineyards through pipelines and fill station pickups. This use is addressed in the June 2005 FEIR and in the City's *Addendum to Final Environmental Impact Report, City of Healdsburg Wastewater Treatment Plant Upgrade/Seasonal Irrigation Reuse Project*, March 21, 2016.

Recycled Water Use Agreements will be developed for each vineyard operator prior to initiating recycled water use. The agreements outline the Administrator's and each vineyard owner's responsibilities for the production, delivery, and use of recycled water in accordance with applicable laws, statutes, rules, regulations, and guidelines. A recycled water use supervisor will be

designated by each property owner to serve as a liaison with the Administrator. The property owners are responsible for appropriate operation of the vineyard irrigation systems with training and supervision provided by the Administrator's staff.

The use of recycled water for vineyard irrigation will be protective of groundwater quality by ensuring that the volume of recycled water used for irrigation at each vineyard property does not exceed hydraulic and nitrogen agronomic rate thresholds on an annual basis. In May 2014, the City prepared a *Programmatic Operations and Management Technical Report for Micro-Irrigation of Vineyards* (Programmatic Technical Report) to the Regional Water Board that compiles results of studies undertaken from 2010 to 2014 by registered hydrogeologists and agronomists to assess the hydraulic and nutrient characteristics of valley floor vineyards and agronomic rate thresholds were determined for vineyard irrigation with recycled water. The Programmatic Technical Report also identifies best management practices (BMPs) that must be implemented to ensure protection of public health and water quality. The agronomic rates and BMPs are included in the NOI and are summarized below.

Vineyard use of recycled water for irrigation shall not exceed the following thresholds:

**Hydraulic Threshold:** The lower of 75% of full crop evapotranspiration (ET<sub>c</sub>)<sup>1</sup> or 9 inches per year distributed over the March through October growing season. ET<sub>c</sub> represents the amount of full potential water use by a crop in inches and is calculated based on reference evapotranspiration (ET<sub>o</sub>) from the nearest operating California Irrigation Management Information System (CIMIS) station and crop coefficient, a factor that accounts for the amount of sun interception in a vineyard. The crop coefficient increases with canopy growth<sup>2</sup>. This hydraulic agronomic rate threshold is based on the protection of groundwater from salinity impacts.

**Nitrogen Threshold:** 15 pounds (lbs) N per acre per year from recycled water only and 30 lbs N per acre from all nitrogen sources distributed over the March through October growing season. The recycled water only threshold is at the low end of the nitrogen range identified as acceptable by the University of California Cooperative Extension for Napa Sanitation District recycled water and is based

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<sup>1</sup> Crop ET (ET<sub>c</sub>) equals ET<sub>o</sub> times the crop coefficient.

<sup>2</sup> The crop coefficient is calculated by applying a standard factor of 0.017 to the percent shade at solar noon. Percent shade at solar noon is a function of row spacing, vine spacing, and the width of measured shaded area between two vines at solar noon. For example if row spacing (A) is 8 feet and vine spacing (B) is 6 feet, the area per vine (C) is 48 square feet. If the width of measured shaded area between two vines at solar noon (D) is 2.4 feet, the percent shaded area is B times D divided by C or 6 times 2.4 divided by 48 which equals 0.3 or 30 percent. The crop coefficient is 0.017 times 30 which equals 0.51.

on irrigating at 9 inches per year with 7 mg/L of nitrogen in the recycled water. Vineyard managers supplement nitrogen with applications of urea and calcium nitrate fertilizers. The nitrogen available from recycled water will offset any fertilization conducted, thus the secondary threshold takes this into consideration.

Regional Water Board staff will assess monitoring data and other pertinent information as it becomes available to evaluate the appropriateness of the agronomic rate thresholds identified in this NOA. If the data or information demonstrates that the recycled water application rates pose a threat or impact to water quality or cause violations of title 22 recycled water requirements, Regional Water Board staff will notify the Administrator and modify the agronomic rate thresholds as appropriate to ensure adequate protection of water quality.

Vineyard use of recycled water for irrigation shall include implementation of the BMPs identified in the NOI, including, but not limited to no use of recycled water for frost protection or in proximity to rainfall events, irrigation practices that minimize the potential for runoff and ponding, fertilization practices that avoid over-application of nitrogen, and equipment operation and maintenance practices that ensure reliable operation of the irrigation system.

On a monthly basis, the Administrator provides recycled water quality information to the vineyard managers and the vineyard managers provide information on recycled water and fertilizer use to the Administrator. The information is used to calculate actual loading rates and assess whether or not the designated thresholds are being met. The use of drip irrigation and the limitations of hauling recycled water have resulted in very low application rates to date. The Administrator will work with vineyard managers if there are any exceedances of the designated thresholds.

### **3. Aggregate Processing**

Syar Industries, Inc. will use recycled water for aggregate processing at its main plant located east of the Russian River at 13666 Healdsburg Avenue, Healdsburg, CA. A use agreement between the Administrator and Syar Industries defines responsibilities for the production, delivery and use of recycled water in accordance with applicable laws, statutes, rules, regulations, and guidelines. The use agreement requires Syar to develop and implement an Operations and Maintenance Plan that addresses leak detection, facility operation, and equipment maintenance and to implement other BMPs to ensure protection of public health and water quality. This Plan must be submitted to the Regional Water Board Executive Officer for review and approval prior to initiating recycled water use for aggregate processing.

The recycled water will be used for dust control on the facility roads and for washing/processing aggregate materials. Recycled water will replace the use of water drawn from onsite industrial groundwater wells. The City Council adopted an EIR Addendum in October 2014 that addressed impacts of recycled water used for aggregate processing.

The Administrator expects to deliver recycled water to Syar Industries for aggregate processing 80 to 120 days per year. The aggregate processing can occur any time during the year. Recycled water will only be used during business hours when the Syar Industries staff is onsite to observe and maintain the equipment. Approximately 50,000 gallons of recycled water per day will be needed to top off a storage pond at the aggregate processing area (commonly called the 150 horsepower (hp) pond, based on the pumping system). Recycled water will compensate for water lost during aggregate processing and through evaporation. The 150 hp pond has a capacity of over 200,000 gallons and is protected by levee banks. The pond was constructed in the 1940s, and a heavy duty visqueen liner was installed in the early 1990s. During years of operation, silt from the clarified water has built up on top of the plastic. There is currently 3 to 4 feet of silt on the walls and bottom of the pond. The pond is maintained every 5 years.

There are no potable water supply lines or potable groundwater wells onsite or within 100 feet of the facility. Potable water is provided to employees through bottled water service at 13 different locations. Two non-potable wells are utilized onsite. Both are considered industrial supply wells and contain enough iron to cause discoloration in the water. The aggregate facility does not have a potable water system on site, so backflow to the potable system is not a concern. However, if potable water is ever extended to the facility, a reduced pressure backflow preventer will be installed. An air gap will be used to prevent backflow from the aggregate processing area to the recycled water pipeline. Depending on the level in the 150 hp pond, the air gap will be one to six feet.

Recycled water is delivered from the Administrator's meter (north of the WRF) through a pipeline owned and operated by Syar Industries to a fill point located at the aggregate processing facility. To deliver recycled water from the WRF to the aggregate processing facility, Syar Industries refurbished an existing 12-inch PVC pipeline that connects with the Administrator's recycled water line. The pipeline crosses Dry Creek and the Russian River through buried conduit and can handle a maximum flowrate of 2.16 mgd. Syar Industries is responsible for operation and maintenance of the pipeline and any equipment installed downstream of its connection to the Administrator's recycled water line. Regular site inspections by Syar Industries and the Administrator will be utilized to ensure proper equipment operation and timely repairs if needed.

At the end of the refurbished recycled water pipeline, the Syar Industries fill point supplies water trucks that control dust on facility roads. The fill point is located within the gated and fenced area of Syar's aggregate processing facility. A locked valve is present on the fill point, which can be accessed by Syar Industries employees only. Furthermore, Syar Industries employees are required to check and ensure the fill point is locked each night before closing.

After the Regional Water Board approves recycled water for aggregate processing, a pipeline will be constructed to connect the recycled water fill point to the 150 hp pond. The pipeline will be a buried 12-inch HDPE pipe with a manually operated, lockable valve installed above ground at the pond edge. A buried gate valve will be installed near the truck fill point to isolate the entire gravel wash line. The clarified wash water is directed to the 150 hp pond for storage and re-use in processing. While most of the property is pervious to rain, some runoff can occur in the aggregate processing area that gets captured by the wash drains and directed to the 150 hp pond. If groundwater is no longer used for aggregate processing, the 150 hp pond will eventually contain only recycled water and collected storm water runoff from the aggregate processing area. At least 2 feet of freeboard is maintained in the 150 hp pond. During large precipitation events ( $\leq$  25 year, 24-hour storm event), overflow can be prevented by continuous operation of the 150 hp pumps, sending water through the aggregate processing area, to the clarifier, and back to the 150 hp pond. For storms greater than 25 year, 24-hour event, the pond will overflow to a lower area with pumps available to send water to a holding basin near the clarifier. This process ensures no runoff is released from the processing area. Solids from the clarifier are pumped to a belt press for dewatering. Approximately 95% of the water is removed during the dewatering process. The dewatered solids are stockpiled onsite for additional drying, and are later sold as soil amendments and fill material for construction and vineyard leveling. Water removed from the dewatering process is returned to the 150 hp pond and is reused for aggregate processing.

#### **4. Soil Compaction, Dust Control and Other Construction Uses**

Recycled water may be used at construction sites for controlling dust on roads and from uncovered trucks that are transporting materials around construction sites, for soil compaction, for mixing herbicides/pesticides, and for other construction-related non-potable water uses. Recycled water is available to permitted water haulers at the Administrator's two commercial fill stations (located at 340 Forman Lane and 280 Kinley Drive in Healdsburg). Recycled water may be transported to sites within the Administrator's approved recycled water hauling area specified in Figure 9 of the NOI.

Truck haulers that transport and use recycled water for construction purposes are required to obtain a permit and follow the Administrator's Recycled Water

Trucked Use Guidelines included in Attachment C of the NOI. Commercial haulers are also required to record the volume of recycled water picked up at the fill station as well as the address and volume of each recycled water delivery. Commercial haulers are required to submit completed logs to the Administrator monthly.

BMPs specified in the NOI must be implemented for the protection of public health and water quality, and include, but are not limited to, signage on trucks stating that recycled water is being used, and protecting storm drains and creeks from recycled water spills by maintaining setbacks from creeks and storm drain inlets, avoiding overspray into areas used by the public, and cleaning equipment in an area where all water can be captured.

## **5. Fire Suppression**

Recycled water may be used for emergency fire suppression and for fire-fighting training. Fire Departments that transport and use recycled water must obtain a permit with the Administrator and follow the Administrator's Fire Suppression Guidelines that are included in Attachment C to the NOI. Recycled water will be available at the Administrator's fill stations, through the recycled water pipeline, or directly from storage ponds at the WRF. Training exercises will be undertaken to educate fire fighters about the uses and health risks presented by recycled water since exposure to infectious agents may occur through open wounds and inhalation. An air gap separation will be maintained whenever tanks on emergency vehicles are filled with any type of water. In addition, fire departments that use recycled water for fire-fighting training will be required to develop a plan describing how compliance with title 22 requirements (such as no spray mist, 50-foot setback to wells, signage, etc.) will be achieved.

BMPs specified in the NOI must be implemented for the protection of public health and water quality, and include, but are not limited to, signage on trucks stating that recycled water is being used, and protecting storm drains and creeks from recycled water spills by covering and blocking drain inlets, and cleaning equipment in an area where all water can be captured.

## **6. Sanitary Sewer Cleaning**

Recycled water may be used by the City and private companies for sanitary sewer cleaning. Private companies that transport and use recycled water for sewer cleaning operations must obtain a permit and follow the Administrator's Sanitary Sewer Cleaning Guidelines that are included in Attachment C to the NOI.

Use of recycled water ensures valuable potable water will not be utilized when a lower quality of water is sufficient. Water and waste generated during cleaning operations is returned to the WRF for treatment. The City will only use recycled

water in sewer cleaning trucks. As a result, separate filling systems (one for potable water and one for recycled water) are not necessary. An air-gap feature is provided on the fill inlet to the on-board tank. Sewer cleaning trucks will obtain recycled water from the Administrator's fill stations. For sanitary sewer cleaning, the primary operational concern is preventing spills during truck fill ups and during the cleaning operation.

BMPs specified in the NOI must be implemented for the protection of public health and water quality, and include, but are not limited to, signage on trucks stating that recycled water is being used, and protecting storm drains and creeks from recycled water spills by covering and blocking drain inlets, and cleaning equipment in an area where all water can be captured.

## **7. Street Sweeping**

Recycled water may be used by the City and private companies for street sweeping operations. Private companies that transport and use recycled water for street sweeping operations must obtain a permit from the Administrator and follow the Administrator's Street Sweeping Guidelines that will be developed for Executive Officer's review and approval prior to any private company utilizing recycled water for street sweeping. The Street Sweeping Guidelines must clearly demonstrate that BMPs will prevent recycled water from being discharged into storm drain inlets.

Street sweeping of streets and rights-of-way is a management strategy to reduce the amount of trash, debris, and particulates that wash off and contaminate creeks during rain events. Most street sweeping vehicles are equipped with a dust suppression and vacuum system. Spraying small volumes of water before the street is swept prevents dust formation. Water, trash, debris and dust are then captured by the vacuum system, and any remaining water evaporates from the ground. Therefore, under ideal conditions no runoff should be produced during street sweeping. An average street sweeping vehicle tank holds 220 gallons of water. The volume of water utilized per day depends on the area that is swept. Vehicles will be filled at the Administrator's recycled water fill stations.

BMPs specified in the NOI must be implemented for the protection of public health and water quality, and include, but are not limited to, signage on trucks stating that recycled water is being used, provision of air-gap on the trucks for backflow prevention when filling up, no use during or immediately before or after a rain storm, protecting storm drains and creeks from recycled water spills by covering and blocking drain inlets, and cleaning equipment in an area where all water can be captured.

## **E. Monitoring and Reporting Program**

Recycled water distributed to uses authorized under this NOA shall be monitored in accordance with the Monitoring and Reporting Program (MRP) Order No. 2016-0068-DDW-R1001 that is being issued with this NOA (Attachment C to this NOA). The MRP is based on the MRP template in Order WQ 2016-0068-DDW and includes monitoring requirements for the recycled water as well as groundwater monitoring requirements.

Groundwater monitoring requirements are necessary for the following reasons:

1. To ensure protection of high quality groundwater in the vicinity of the vineyard recycled water use sites. When applying recycled water, excess nitrate that is not absorbed by plants and salts can accumulate in the soil and ultimately leach into groundwater. Implementation of a representative groundwater monitoring program will generate data to determine whether nitrates and salts are leaching to groundwater at concentrations above water quality standards, and to assess whether adjustments to the recycled water application rates and other irrigation management practices are necessary to ensure adequate protection of high quality groundwater.
2. The State Water Board Recycled Water Policy requires the development of salt and nutrient management plans (SNMPs) for all groundwater basins to facilitate basin-wide management of salts and nutrients from all sources in a manner that optimizes recycled water use while ensuring protection of groundwater beneficial uses such as municipal and domestic water supply, industrial water supply, industrial process water supply, agricultural water supply and surface water replenishment. Currently, there are no SNMPs for the groundwater basins where the recycled water use is occurring or will occur (described in section B of this NOA). The groundwater monitoring program required in the MRP will provide the necessary data to facilitate the management of salts and nutrients at the use sites until such time that SNMPs for these groundwater basins are developed and implemented.

The MRP specifies the groundwater monitoring parameters and requires the Administrator to submit for Regional Water Board Executive Officer review and approval, a groundwater monitoring work plan that identifies groundwater monitoring locations and documents that the groundwater monitoring wells proposed are appropriately placed and constructed.

Recycled water production requirements are included in WDR Order No. R1-2010-0034 (through July 31, 2016) and Order No. R1-2016-0015 (beginning August 1, 2016) which includes title 22 turbidity specifications and recycled water limits for

total coliform organisms. Recycled water use monitoring and reporting requirements are specified in the attached MRP.

#### **F. Division of Drinking Water Acceptance and Conditions**

The Administrator addressed title 22 Engineering Report requirements in its NOI and submitted it to DDW staff. DDW staff provided comments and conditional acceptance of the Administrator's recycled water program to the Administrator in a letter dated May 20, 2016. Portions of the NOI were previously reviewed and approved by DDW (formerly California Department of Public Health (CDPH)) with letters dated November 16, 2010 (CDPH acceptance of original title 22 Engineering Report), April 16, 2014 (DDW acceptance of title 22 Engineering Report addendum addressing dust control), and July 15, 2015 (DDW acceptance of Landscape Irrigation Recycled Water Program Technical Report and NOI). The CDPH/DDW acceptance letters are included as Attachment D to this NOA.

The Administrator shall comply with the following recycled water use conditions specified in the November 20, 2010 and May 20, 2016 DDW acceptance letters. Note that the April 16, 2014, and July 15, 2015, acceptance letters did not specify any conditions.

- 1. User Agreements.** The City, as the responsible agency, must ensure that before delivering recycled water to an end user that user agreement(s) are signed and that all regulatory agencies have sufficient time to review and approve the recycled water project.
- 2. Recycled Water Pipeline Installation.** Installation of new recycled water pipelines must meet title 22 section 64572 Water Main Separation. Pipelines conveying disinfected tertiary recycled water must have a minimum of four (4) feet horizontal and one (1) foot vertical clearance from any parallel pipeline conveying potable water.
- 3. Future Submittals.**
  - a.** New types of recycled water uses, other than those described in this revised NOA, must be addressed in a revision or update to the title 22 Engineering Report and submitted for DDW review and approval.
  - b.** Revisions and updates to the Recycled Water Program Technical Report must be provided to DDW to demonstrate that applicable operations and management programs are in place.
  - c.** Any updates or changes to the title 22 Engineering Report must also be made in any application documents submitted to the Regional Water Board (i.e., Technical Support Documents and Report of Waste Discharge Documents).

## **G. Water Recycling Requirements**

1. The distribution and use of recycled water shall be limited to the uses described in and managed in accordance with the May 5, 2016, NOI, DDW-approved title 22 Engineering Report (Attachment A to the NOI) and addenda (Attachments C and D to the NOI), and this NOA.
2. The use of recycled water shall not cause pollution or nuisance, as defined by Water code section 13050.
3. The recycled water shall be tertiary disinfected recycled water as defined by title 22, section 60301.230.
4. The Administrator shall notify the Regional Water Board of any recycled water spills or unauthorized uses upon discovery.

## **H. Other Requirements**

1. The Administrator is responsible for compliance with all Specifications, Water Recycling Administration Requirements and General Provisions of the General Order, this NOA (including approved title 22 engineering reports and addendums included with the NOI), title 22, and the CDPH/DDW acceptance letters dated November 16, 2010, April 16, 2014, July 15, 2015, and May 20, 2016.
2. The Administrator shall update the Training Programmatic Technical Report for Micro-Irrigation of Vineyards by July 1, 2017.
3. The Administrator shall provide training to all recycled water users prior to first use of recycled water and annually thereafter. The Administrator shall document all training and maintain training records for a minimum of three years.
4. The Administrator shall submit the Syar Gravel Processing Operations and Maintenance Plan to the Regional Water Board and DDW for review and approval prior to initiating recycled water use for gravel processing.
5. The Administrator shall develop and submit guidelines for the use of street sweeping for the Executive Officer's review and approval prior to initiating recycled water use for street sweeping.
6. The Administrator shall submit fire-fighting training recycled water use plans describing how title 22 requirements will be achieved to the Regional Water Board and DDW for review and approval prior to allowing recycled water use for fire-fighting training.

## **I. Document Submittals**

All correspondence (other than monitoring reports required by MRP Order No. 2016-0068-DDW-R1001) should be converted to searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50 MB shall be emailed to:

[NorthCoast@waterboards.ca.gov](mailto:NorthCoast@waterboards.ca.gov)

Documents that are 50 MB or larger should be transferred to a CD, DVD, or flash drive and mailed to:

North Coast Regional Water Quality Control Board  
5550 Skylane Boulevard, Suite A  
Santa Rosa, CA 95403

All monitoring reports should be submitted electronically in accordance with section V of MRP Order No. 2016-0068-DDW-R1001.

If you have any questions regarding this NOA or the Administrator's enrollment under the General Order, you may contact Cathleen Goodwin of my staff at (707) 576-2687 or [Cathleen.Goodwin@waterboards.ca.gov](mailto:Cathleen.Goodwin@waterboards.ca.gov).

Sincerely,

Matthias St. John  
Executive Officer

160701\_CAG\_ef\_Healdsburg\_NOA\_RecycledWater\_GeneralOrder

### **Attachments:**

Attachment A: Statewide General Waste Discharge Requirements for Recycled Water Use, Order WQ 2014-0090-DWQ

Attachment B: Statewide General Water Reclamation Requirements for Recycled Water Use, Order WQ 2016-0068-DDW

Attachment C: Monitoring and Reporting Order No. 2016-0068-DDW-R1001

Attachment D: CDPH/DDW Acceptance Letters dated November 16, 2010, April 16, 2014, July 15, 2015, and May 20, 2016

Certified-Return Receipt Requested

cc (without attachments):

Annalisa Kihara, State Water Resources Control Board, Sacramento,  
[Annalisa.Kihara@waterboards.ca.gov](mailto:Annalisa.Kihara@waterboards.ca.gov)

Randy Barnard, State Water Resources Control Board, Division of Drinking  
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