



# County of San Diego

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California Energy Commission  
Commission Docket Unit  
1516 Ninth Street, MS-15  
Sacramento, CA 95814

**DOCKET**

**08-AFC-4**

DATE MAR 18 2009

RECD. MAR 25 2009

Members of the Energy Commission:

## **Docket No. 08-AFC-4 COMMENTS ON THE PRESIDING MEMBER'S PROPOSED DECISION FOR THE ORANGE GROVE POWER PLANT PROJECT**

The County of San Diego Department of Environmental Health (DEH) appreciates the opportunity to comment on the Presiding Member's Proposed Decision (PMPD) for the Orange Grove Power Plant Project located in San Diego County. DEH has reviewed the project as a result of our regulatory oversight for the use of onsite wastewater treatment systems (OWTS), recycled water and requirement for an adequate supply of potable water. DEH has multiple public health and basic sanitation concerns related to water for this project. The following contains our comments and recommendations on the proposed project.

### **Onsite Wastewater Treatment System and Potable Water Supply**

Under the Conditions of Certification in the Soil and Water Resources section of the report, the Soil & Water-11 section states that the project owner shall comply with all San Diego County Onsite Wastewater Treatment System Ordinance requirements and that project construction shall not proceed until documentation equivalent to the County's OWTS permit is issued by the County. San Diego County Code Section 68.326 requires that prior to the issuance of an OWTS permit, proof of an adequate, potable water supply is required. This project has not demonstrated an adequate potable water supply for the following reason.

Our Department does not consider trucked in water to be an adequate potable water supply since it is not reliable and there are health risks associated with maintaining the water free of contaminants as part of the trucking and transfer process. Potable water is defined as water which is satisfactory for drinking, culinary and domestic purposes and meets the requirements of the health authority having jurisdiction. The use of the term potable water within the report is inconsistent with this definition and should be replaced with the term non-potable water as the water would no longer be considered potable as a result of the trucking process and the proposed inter-mixing with recycled water in the storage and distribution system.

This project proposes to use both trucked in recycled and potable water for the majority of the onsite needs and bottled water for drinking water. Per the report, the trucked in potable water will be used for landscaping, fire protection, facility wash down, safety shower/eye wash and sanitary systems which would include toilets and hand sinks. DEH does not approve trucked in water being used in a

manner that allows human contact such as proposed with the hand sinks and safety shower/eye wash station since the water will no longer be potable. In addition, Condition of Certification Soil & Water-9 indicates that in the event of interruptions to the potable water supply, which per the report is expected to happen, recycled water will be substituted for the potable water. Recycled water will also not be approved in a manner that allows human contact due to the potential for adverse health risks.

The use of bottled water will not be approved for the potable water needs for this project. Chapter 6 of the California Plumbing Code requires all plumbing fixtures to be provided with an adequate supply of potable running water and for the supply to be pressurized at a minimum pressure of 15 psi. The use of bottled water for the hand sinks would not meet the requirements of the regulations nor would it provide for the sanitary needs of the employees.

Due to the inability to pipe public water to the site, the only alternative appears to be the installation of a water well to meet the needs for the potable water supply. DEH does not concur with the statement found in the Project Alternatives section of the report which states "The limited supply and ongoing use of ground water in the San Luis Rey basin are judged to make it not likely that this source of water would be permissible or acceptable". DEH would not object to the use of groundwater as the potable water supply as long as the water well was installed under permit and water quality objectives were met. It is our experience that water wells in this area can supply potable water with the acceptable quality and quantity needed for the actual potable water supply needs of the project. Trucked in recycled or non-potable water could then be considered for the remaining needs.

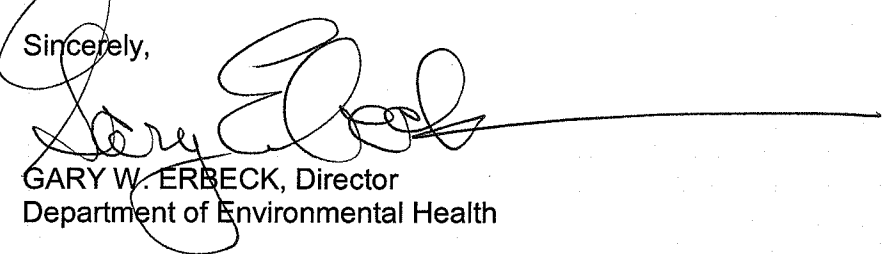
### **Recycled Water Use**

The project proposes to use tertiary treated recycled water in the evaporative cooling towers and to be substituted for the potable water as needed for landscaping, fire protection, facility wash down, safety shower/eye wash and sanitary systems. As discussed previously, recycled water can only be used in a manner that does not allow human contact. Other uses can be allowed with approval from the Regional Water Quality Control Board, California Department of Public Health and DEH.

The use of recycled water in toilets or other fixtures or plumbing that drains to the OWTS will need to address the issue of chlorine residuals in the recycled water and any detrimental effects on the proper functioning of the OWTS. In addition, the water well needed to provide for the potable water supply of the project must be located at least 50 feet from any landscape irrigation using recycled water. Additional comments will be provided upon submittal of the required engineering reports for the proposed use of the recycled water.

Should you have any questions regarding our comments, please contact Tom Lambert, Program Coordinator for the Land and Water Quality Division at (858) 495-5752 or by email at [tom.lambert@sdcounty.ca.gov](mailto:tom.lambert@sdcounty.ca.gov).

Sincerely,



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Department of Environmental Health