

From: Casey Weaver
To: Logan Olds
CC: Ellie Townsend-Hough; Fred Strauss; JMorales@waterboards.ca.gov; John...
Date: 3/4/2009 10:10 AM
Subject: Re: VVWRA reclaimed water

DOCKET

97-AFC-1

DATE MAR 04 2009

RECD. APR 17 2009

Hi Logan.

I understand your confusion (puzzlement) and the apparent miscommunication. I am of the same opinion. We have been trying to determine the availability of recycled waste water generated at VVWRA, in excess of that obligated by the DFG MOU, for some time now.

Regarding HDPP's response to our request for information, none of the numbers submitted (except total effluent) added up. Jon's submission of last year's total of 8729 AF of recycled (disinfected, Title 22) waste water was not shown on your table. There was no indication of where that number came from. That number was not presented on your table. Jon's assertion that 4099 AF of recycled water is available was based on subtracting VVWRA Effluent Flows required per F&G MOU (9677 AFY) from the total VVWRA Discharge (13,776 AFY). Your table indicates "required discharges", not what was actually discharged. But even if you did discharge 9677 AF of recycled water, the remainder of your effluent discharge (4099 AF) is certainly not recycled waste water available for other uses.

I submitted a rather simple, but direct set of questions and got back answers that are not accurate.

Here is what I asked:

- 1) total WWTP effluent.
- 2) total amount of recycled (disinfected, title 22) waste water produced.
- 3) total amount of recycled (disinfected, title 22) waste water sent to the golf course.
- 4) total amount of recycled (disinfected, title 22, dechlorinated) waste water released to the Mojave River through the weir.
- 5) total amount of recycled (disinfected, title 22, dechlorinated) waste

water obligated for release to the Mojave River through the weir under the DFG MOU.

6) total amount of recycled water (disinfected, title 22) available for "other" uses.

I would still like accurate answers to those questions.

I understand that you consider the perc ponds contribution to the basin as, at least partially, satisfying the requirements in the DFG MOU.

However, item 3 on page 3 of the DFG MOU clearly states that VVWRA "will continue to discharge 9,000 acre feet annually...of "available recycled water". Recycled water by definition is Title 22, disinfected waste water. **Not** secondary treated, non disinfected waste water. The MOU identifies the perc ponds as one of two points of discharge, but it states the discharge must be "recycled" waste water.

Further, Lahontan Board Order No. R6V-2003-028, Attachment E, defines recycled water as "disinfected tertiary recycled water".

The Order stipulates that the "WWTP is currently designed to provide tertiary-level treatment for 8.3 mgd of disinfected wastewater discharged to the Mojave River and secondary-level treatment for 2.7 mgd of undisinfected waste water discharged to onsite percolation ponds." This separation clearly demonstrates what is intended for river replenishment and what is merely waste disposal.

Without clarification and approval from DFG and LRWQCB that states otherwise, we can only conclude that VVWRA is obligated to discharge "recycled" waste water to comply with the MOU.

Section 3 of the Order states "The ultimate delivery of 1,680 acre feet per year of recycled water is planned but uses other than the existing Westwinds Golf Course are not authorized at this time."

It should also be noted that Section II(c) of the Order states "Recycled water shall not be used at other locations or for uses other than those

specified in Section II.B, above (irrigation at Westwinds Golf Course). Before any use may be changed or expanded, the User/Producer must file a revised Report of Recycled Water Use to the Regional Board..."

In summary, it does not appear that a sufficient volume of recycled water is available or permitted for uses other than replenishment to the Mojave River and irrigation to Westwinds Golf Course.

To further this evaluation, could you please update me on the status of your facility expansion, what schedules are known and what your expected production volume of additional "recycled" water will be and when?

Thank you.

Sincerely,

Casey Weaver

>>> "Logan Olds" <lolds@vwwra.com> 3/4/2009 6:58 AM >>>
Good Morning Casey,

Jon sent over your comments for review and they left me highly puzzled. I think the miscommunication occurred regarding effluent discharged through the weir to the Mojave River. All water that passes through the weir is title 22 compliant. VVWRA produces two qualities of water. Secondary effluent which is sent to the percolation ponds and tertiary title 22 water which is sent to the Mojave River. VVWRA has the operational capability to redirect the title 22 flow to the power plant and still meet its obligations to the fish and game mou by discharging to the percolation ponds and the remainder to the river. Currently VVWRA can reliably produce 8 mgd of tertiary water.

I hope this helps answer some of your questions.

Thanks

Logan Olds

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