

Hello Kevin,

Thanks for allowing me to submit my comments late. I have attached my comments and here is a link that will take you to the District's Emergency Cross Connection Response Plan:

<http://www.dsrsd.com/home/showdocument?id=88>. The cross connection response plan is on the second page of this document.

Let me know if you have any other questions.

Thanks,

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AB 2282 Recycled Water Reuse Systems

Comments for Draft Express Terms for 2016
California Plumbing Code, Part 5,
California Building Standards Code, Title 24

Sections 1502.3, 1503.4, 1504.4, 1601.4, 1602.4 Connections to Potable or Recycled Water Systems:

All the above sections state the potable water supply can supplement recycled water through the use of a reduced pressure assembly or other physical device, however this is a violation of California Code of Regulations Title 17, Section 7604. Title 17, Section 7604 states, “premises where the public water system is used to supplement the recycled water supply an air gap is the minimum type of backflow prevention allowed.” The Authority having jurisdiction will require an air gap at the meter if there are direct connections between potable and recycled water systems within a commercial or residential building.

Section 1503.5 Initial Cross Connection Tests, The water purveyor will require a certified cross connection tester perform cross connection testing.

Section 1501.11.2.3 Discovery of Cross-Connection:

Recommended edits for the steps:

- #1 Notification of the Authority having jurisdiction (typically only the water agency has the authority to shut down the potable water system)
- #2 immediately shut down the recycled water supply to the facility
- #3. Keep potable system pressurized and post signs at all potable water fixtures and outlets stating “Do Not Drink”
- #4. Identify cause and location of backflow and eliminate the cross-connection(s)
(Continue with the rest of the steps)

I have attached a copy of the District’s Emergency Cross Connection Response Plan for your reference.

Section 601.3.3 Alternate Water Sources: the purple background (Pantone color No. 512) is specific to tertiary treated recycled water and should only be used where tertiary treated recycled water is utilized. Gray water and rainwater systems signage should utilize a different coloring system.

Section 602.3 Backflow Prevention. Suggest adding the following statement to the section, verify with the Authority having jurisdiction if backflow protection is required on the proposed recycled water supply system.

Section 1503.0 Recycled Water Systems.

Section 1503.1 General

At this time California Code of Regulations Title 22, does not allow tertiary treated recycled water be used within residential buildings for water closets. Title 22, only allows recycled water be used at residential properties for front and backyard irrigation. In addition, a reduced pressure backflow assembly or double check valve backflow assembly must be installed on the residential property’s water service line. The residential property will also be classified as a dual plumbed facility and will require additional monitoring and testing by the Authority having jurisdiction.

RECYCLED WATER (RW) SYSTEM EMERGENCY PROCEDURES

RELEASE OF 50,000 GALLONS OR MORE OF RECYCLED WATER TO STORM DRAIN

Immediate notification of the District is required.

Immediately:

1. Turn off the recycled water system.
2. Call District's Customer Service Department at (925) 875-2057. After business hours call Alameda County Sheriff Dispatch (925) 462-1212.
3. Contact the respective city's storm water department to report the unauthorized discharge:
 - o City of Dublin (925) 833-6650
 - o City of San Ramon (925) 313-2285
 - o City of Pleasanton (925) 313-2000
 - o City of Pleasanton (925) 931-5511

Follow Up:

Complete the **Recycled Water Discharge Report** at www.dsrsd.com within **3 business days**. Be sure to include the following information:

- Location of discharge
- Date and time thereof
- Volume of discharge
- Actions taken to stop the discharge
- Corrective actions taken to repair the cause of the discharge

RELEASE OF LESS THAN 50,000 GALLONS OF RW TO STORM DRAIN

1. Isolate the section of the recycled water system in order to secure discharge.
2. If less than 50,000 gallons, document the incident and submit to District **within 5 business days**.
3. Complete the **Recycled Water Discharge Report** at www.dsrsd.com.

DISASTERS AND DAMAGE

In case of earthquake, flood, fire, major freeze, construction accident, or other incident that could cause damage to the recycled or potable water systems, the site supervisor must inspect the domestic and recycled water systems for damage as soon as it is safe to do so.

- If either system appears damaged, shut off both domestic and recycled water systems at their points of connection.
- If site supervisor cannot inspect the site and damage is expected, shut off both domestic and recycled water systems at their points of connection to the water meter.
- **Site supervisor must immediately contact the District for further instructions.**

To prevent contamination, damage, or a public health hazard, customer may make emergency modifications or repairs without the District's prior approval. As soon as possible after modification (but within three days), customer must notify the District of the emergency modifications and file a written report.

EMERGENCY CROSS CONNECTION RESPONSE PLAN on the other side



RECYCLED WATER (RW) SYSTEM EMERGENCY PROCEDURES

CROSS-CONNECTIONS

- If unable to shut down potable and/or recycled water system
- If the drinking water has an odor or a yellowish tint

There may be a cross-connection between the potable water and recycled water systems. If you suspect a cross-connection between the two systems, you should notify the District immediately. The District will assist you in determining if there is a cross-connection onsite.*

If you discover a cross-connection between the two systems, **immediately invoke the Emergency Cross-Connection Response Plan described below:**

EMERGENCY CROSS-CONNECTION RESPONSE PLAN

1. Immediately notify the following agencies:
 - DSRSD Customer Service Department (925) 875-2057
 - After business hours call Alameda County Sheriff Dispatch (925) 462-1212
 - Department of Public Health (510) 540-2151
2. Immediately shut down the recycled water supply to the facility.
3. Keep the potable system pressurized and post "Do Not Drink" signs at all potable water fixtures and outlets.
4. Provide bottled water for building occupants until potable water system is deemed safe to drink.
5. Identify cause and location of backflow and eliminate the cross-connection(s).
6. Contact DSRSD to request collection of samples from the potable water system. DSRSD will perform a 24-hour bacteriological analysis on the collected samples. The customer will bear the costs of sample collection and analysis.
7. The District will also conduct a cross-connection test to verify all cross-connections were eliminated.
8. **If the bacteriological analysis conducted in Step 6 is positive:** chlorinate the potable water system, maintaining a chlorine residual of at least 50 mg/L for 24 hours.
9. **If analysis is negative in step 6:** proceed to Step 12.
10. Flush potable water system after 24 hours and perform standard bacteriological analysis again.
11. If the results from Step 10 are acceptable, proceed to Step 12. Otherwise, repeat Steps 8-10.
12. Obtain final approval from the District, but do not yet remove the "Do Not Drink" signs.
13. After final approval has been obtained from the District, the District will bring the recycled water system back into service and the customer will remove the "Do Not Drink" signs from all potable water fixtures and outlets.

***Customer is responsible for all District costs in the event of a cross-connection with customer-owned facilities.**



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