

From: Ralph McIntosh [mailto:ralphmcintosh@rmwd.org]
Sent: Thursday, October 01, 2009 9:11 AM
To: 'BSC@dgs.ca.gov'
Cc: 'Patty Bevers'; 'Tim Stanton'; 'Alice Benson'; 'jbreaan@rmwd.org'
Subject: Graywater Standards: Title 24, Part 5, Chapter 16A, Part 1
Importance: High

I am writing regarding the above referenced item, Graywater Standards.

As the General Manager of the Ramona Municipal Water District, I can approve of these standards if amended as follows;

Suggested Revisions to the Text of the Regulations: Graywater Standards, Title 25, Part 5, Chapter 16A, Part 1-

1063A1.1 Clothes Washer System and/or Single Fixture System. A clothes washer system and/or a single fixture system in compliance with all of the following is exempt from the construction permit specified in Section 108.4.1 and may be installed or altered without a construction permit:

- 1. If notification has been provided to the Enforcing Agency regarding the proposed location and installation of a graywater irrigation or disposal system.**

Reason:

The proposed standard in this section is unnecessarily vague in that it is not clear whether the notification of the enforcing agency is required. The Ramona Municipal Water District (RMWD) believes that any waiver of the notice requirements for installation of graywater systems is unreasonable and arbitrary for the following reasons:

- 1. A notice requirement provides an opportunity for the enforcing agency (County of San Diego/RMWD) to educate the customer on the twelve requirements that must be met in order to waive the permit requirements. Compliance with these requirements is critical to ensure protection of public health. Two key requirements are of particular concern to water agencies: the provision that prohibits the use of a pump and the provision prohibit a direct connection between the potable and graywater system. On site pumping and direct connections would pose a direct threat of contamination to the public water supply system.**
- 2. A notice requirement will provide water agencies such as RMWD with information on where graywater systems are being installed. This information is CRITICAL to water agencies for the following reasons:**
 - a. Where auxiliary water supplies are in use, water agencies have a duty under Title 17, CCR, Section 7604, to ensure that backflow protection is installed at the water meter to protect their water system. Meter protection cannot be provided where the water agency is unaware of the auxiliary water supply.**
 - b. For planning purposes, water agencies need to know the extent of graywater use to better assess the impacts on demands on the public water supply system.**

- c. For planning purposes, wastewater agencies need to know the extent of graywater use to better assess the impact on wastewater flows.**

While we are not opposed to graywater system installation as a means of water conservation, we are opposed to the lack of oversight proposed. It is imperative that there is oversight and an application process in place to assist water agencies in knowing where such a system is to be installed to lessen the chances of creating a cross connection to the potable water system that could create a major public health issue and for the purposes of the daily operations of the water and wastewater systems.

As stated, we can approve of the new regulations if amended as stated above.

Sincerely,

Ralph McIntosh

Ralph McIntosh
General Manager
Ramona Municipal Water District