



The Western Coalition of Arid States

WESTCAS

December 16, 2019

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David Ross

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RE: Comment on the Proposed Rule on “Draft National Water Reuse Action Plan,” 84 Fed. Reg. 48612 (Sept. 16, 2019), Docket No. EPA-HQ-OW-2019-0174; FRL-9999-82-OW

On behalf of the Western Coalition of Arid State (WESTCAS), I appreciate the opportunity to comment on the U.S. Environmental Protection Agency (EPA) proposed rule on “Draft National Water Reuse Action Plan” (WRAP) 84 Fed. Reg. 48612. WESTCAS would also like to take this opportunity to commend the EPA for having the vision to develop a nation-wide WRAP to promote water reuse. This represents an important expansion from the current Federal water reuse focus on just the Western states. The time to fully utilize recycled water is now, and this plan will help facilitate that advancement.

WESTCAS was established in 1992 when water and wastewater service providers joined together to share their talents and resources to encourage the development of water programs and regulations that help assure adequate supplies of high quality water for those living in the arid regions of the arid west while protecting the environment. WESTCAS has current members in Arizona, California, Colorado, New Mexico, Nevada, and Texas, many of the states that are leaders in water reuse.

WESTCAS is an advocate for legislation and federal policy that acknowledges the unique challenges and characteristics of the arid states, and that includes EPA’s development and implementation of the WRAP. WESTCAS encourages water reuse as a sustainable, reliable water supply for the arid west that provides tools that help drought-proof arid regions, like those represented by our membership. Many WESTCAS members are already actively implementing recycled water programs. WESTCAS members are experienced recycled water users and speak with a wealth of knowledge and experience.

The Voice of Water Quality in the Arid West

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There are a number of excellent actions in the WRAP, however WESTCAS particularly supports the following actions:

- 2.2.2 Enhance State Collaboration on Water Reuse;
- 2.2.4 Enhance Wastewater Source Control through Local Pretreatment Programs to Support Water Reuse Opportunities for Municipal Wastewater; and
- 2.2.9 Revise Guidance on “Disposal of Unused Medicines” to Better Reflect Source Control Benefits that Support Water Reuse and Recycling.

2.2.2 Enhance State Collaboration on Water Reuse: States represented by WESTCAS members have vastly different regulatory requirements, and the degree of flexibility for the application of recycled water can be quite different from state to state. EPA can assist in streamlining and standardizing treatment technology validation processes to enable faster adoption of new technologies. WESTCAS believes that water reuse could accelerate more rapidly if the states that have antiquated regulatory requirements could benefit from the lessons learned and the more streamlined, and flexible regulatory protocol of the states who are more advanced in the development and implementation of the use of recycled water.

2.2.4 Enhance Wastewater Source Control through Local Pretreatment Programs to Support Water Reuse Opportunities for Municipal Wastewater: Promoting local pretreatment programs is an important element for advancing water reuse. However, in addition to local pretreatment programs, WESTCAS encourages the EPA to assist in pretreatment efforts, nationwide by discouraging the use of self-regenerating water softeners. These devices can contribute 30 pounds of salt into the wastewater collection systems daily, per home. That increase in salinity in recycled water can have detrimental effects that result in limited use of recycled water because of the high salt content, which then reduces the overall viability and sustainability of recycled water programs.

The EPA Water Sense program is currently evaluating self-regenerating water softeners as a device that may earn the “EPA Water Sense” label. While EPA’s Water Sense webpage says “At this time, WaterSense is not proceeding with the development of a draft specification for water softeners. EPA would like to take this time to further explore the concerns that have been raised by some stakeholders regarding the effect of water softener discharge on wastewater treatment.” WESTCAS urges that EPA make an affirmative statement that these devices are detrimental to water quality, and that they are not eligible to earn EPA’s water sense label.

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2.2.9 Revise Guidance on “Disposal of Unused Medicines” to Better Reflect Source Control Benefits that Support Water Reuse and Recycling. This action is critical for maintaining the highest quality recycled water. Current FDA guidelines indicate that if a drug take-back center is not available, then unused medication should be flushed down the toilet. Many pharmaceuticals are very persistent, and do not break down or degrade in the wastewater treatment process, which means these drugs end up in nature when the recycled water is discharged to a river or stream, or potentially back into our drinking water supply in the case of potable reuse. WESTCAS strongly encourage the FDA to find and promote better alternatives to flushing unused medication down the toilet.

Thank you for the opportunity to comment on this Water Reuse Action Plan. WESTCAS members have extensive history using recycled water, and also have a wealth of knowledge and experience in both recycled water use, and pretreatment/source control efforts. WESTCAS is well positioned and willing to assist EPA in the implementation of the Water Reuse Action Plan. If you have any questions regarding these comments, please contact me at 760-393-7792 or sbigley@cvwd.org.

Sincerely,

Steve Bigley
President

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