Reclaimed Water Stakeholder Issues Matrix

Topic	ADEQ Ideas	12-Feb	10-Mar	Other	Comment
Conveyances/Infrastructure		x			Reclaimed system cross-connection control should apply only if delivery is to a facility that has the ability to return pressurized flow, for example, industrial use.
Conveyances/Infrastructure			x		Cross-connection control requirements are not necessary in the rule because they are already covered under potable system rules and procedures.
Conveyances/Infrastructure			x		Provisions for cross-connection control and backflow protection are in drinking water rules, but not for residential properties supplied with reclaimed water unless a hazard is identified.
Conveyances/Infrastructure	x		x		Need cross-connection criteria where both potable water and reclaimed water is provided.
Conveyances/Infrastructure	x				Technical standards: More comprehensive criteria for design, construction, O&M
Conveyances/Infrastructure		x			Establish best management practices for design, construction, operation, and maintenance of reclaimed water conveyances and infrastructure.
Conveyances/Infrastructure		x			Establish criteria for reclaimed water distribution systems that maintain water quality during distribution to ensure that water is safe for allowed end uses at all times (for example, maintenance of chlorine residual).
Conveyances/Infrastructure		x			Establish best management practices for reclaimed water conveyances and infrastructure; statewide rules would be helpful. If utilities already have adopted standards, they should be allowed to follow those standards, however.
Conveyances/Infrastructure		x			Because reclaimed water quality may change considerably during distribution, ensure that water quality remains safe for intended uses.
Conveyances/Infrastructure		x			By requiring enhanced management of distribution systems to maintain water quality during distribution, Class A and A+ water will remain safe for open access by humans and suitable for all intended uses.
Conveyances/Infrastructure		x			Address criteria for low head pipeline conveyance (less than 50 psi).
Conveyances/Infrastructure		x	x		Clarify requirement (or no requirement) to maintain horizontal and vertical separation between reclaimed water, sewer, drinking water and stormwater conveyances.

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Conveyances/Infrastructure includes requirements for pipeline and open water structures that carry reclaimed water
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			x		What about service line separation requirements, or do rules continue to apply to main lines only
Conveyances/Infrastructure		x			In regard to criteria for distribution systems that are specified in rule, add a provision to allow ADEQ to consider alternative criteria similar to the process provided for septic tank and alternative onsite systems in R18-9-A312(G).
Conveyances/Infrastructure		x			Do not add standards or criteria for conveyance systems into the rule. Allow regions or cities to develop site-specific standards.
Conveyances/Infrastructure		x			Add recharge to the list of allowed end uses to facilitate consistent collection of data on volumes distributed to recharge, but only for that reason. Recharge facilities are already permitted under the APP program and should continue to be regulated under it for all other purposes.
Conveyances/Infrastructure		x			Clarify ability to combine a class of reclaimed water with stormwater, surface water, or harvested rainwater in reclaimed water distribution systems.
Conveyances/Infrastructure				x	Requiring enhanced management of reclaimed water distribution systems seems like an unnecessary additional burden to small systems and another layer of bureaucracy. If enhanced management is implemented, it should be imposed only on systems which demonstrate that there is a need for it.
Conveyances/Infrastructure				x	Do not add additional standards or criteria for conveyance systems into the rule. Allow regions or cities to develop site-specific standards, or use existing water distribution standards with the exception of color and labeling.
Conveyances/Infrastructure			x		Need standard signage requirements for each reclaimed water quality class, including specific indication of number and location of signs.
Conveyances/Infrastructure			x		Do signs need to say, “Caution. Reclaimed Water. Do Not Drink.” at open water conveyance sites, where the water quality is likely better than any stormwater or other water entering the site? Perhaps signs that educate with respect to the good quality rather than give a negative idea of the water.
Conveyances/Infrastructure			x		Need to clarify R18-9-602(C)(3), which states that a pipeline conveyance shall be operated so that “the capability for inspection, maintenance, and testing is maintained.”

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Conveyances/Infrastructure			x		While details should be left to local jurisdictions, some baseline standards or criteria for conveyance systems may be helpful.
Conveyances/Infrastructure			x		Although backflow prevention is covered under the drinking water rules, there is a disconnect between utilities implementing reuse and the water system suppliers.
Conveyances/Infrastructure		x	x		Need criteria for active management of reclaimed water distribution systems for appropriate operation and maintenance.
Conveyances/Infrastructure			x		Require all reclaimed water piping to be purple. Currently, ductile iron is used for both potable and non-potable, with marking tape, signs, and purple plastic sleeves for non-potable. Square valve box lids are used to signify non-potable.
Conveyances/Infrastructure			x		Make the pipe manufacturers color the pipe purple to prevent cross connections.
Conveyances/Infrastructure			x		If drinking water rules do not address reuse pipe marking, then at a minimum, reuse pipes within a certain distance of potable pipe must be marked OR require all reuse piping to be marked.
Conveyances/Infrastructure			x		Prioritize access and permissions to 1) agricultural use of all alternative water sources (gray, reclaimed) and 2) power plants for cooling.
Conveyances/Infrastructure			x		Allow and facilitate use of existing irrigation canals (in Phoenix area especially) to move reclaimed water from wastewater treatment plant to end user. This infrastructure already exists, thus is cheaper to operate.
Conveyances/Infrastructure			x		A major hurdle in reuse of reclaimed water is how to get it from the plant to the end user. Rules should address this difficulty. Policy statement?
Conveyances/Infrastructure			x		Address expenses of constructing reclaimed water delivery systems.
Conveyances/Infrastructure			x		Address and allow emerging technologies and alternative practices.
End Uses and Standards	x				Uses are too limited; need more

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End Uses and Standards	x				Are constituents for monitoring, numerical limits, and monitoring frequencies appropriate for the five reclaimed water quality classes to ensure public health protection and safe water quality for the allowed end uses?
End Uses and Standards	x				Add recharge to the list of allowed uses, but exempt it from reclaimed water end use permits because recharge is permitted under APP.
End Uses and Standards	x	x			New reclaimed water quality classes are needed.
End Uses and Standards		x			Add open loop cooling systems (for example, cooling towers) as an allowed end use.
End Uses and Standards		x			Add non-contact, non-food, industrial/manufacturing end uses such as metal finishing, boiler feed water, semiconductor/electronics fabs)
End Uses and Standards		x			Review RWQS classes and allowable technologies suitable for achieving classes. Current system is out-of-date and does not address alternative technologies.
End Uses and Standards		x			Add surface water augmentation as an approved end use, in conjunction with AZPDES surface water permitting and drinking water source water assessment.
End Uses and Standards		x			Add aquifer recharge/aquifer replenishment as an allowed end use, but maintain all regulatory requirements under the current APP that is issued for such sites.
End Uses and Standards		x			Constituent limits under the different RWQS classes should ensure protection of human health.
End Uses and Standards		x			End use standards should be risk-based and include potable reuse options.
End Uses and Standards		x			Ensure that monitoring requirements for the different RWQS classes are based on performance standards rather than requiring a specific type of technology.
End Uses and Standards		x			For Class A+ and A water, allow alternatives to filtration. Better yet, develop standards based on performance (meeting specified quality standards) rather than requiring particular technologies.
End Uses and Standards		x			Make it easier to distribute multiple classes of reclaimed water from one wastewater treatment plant, for example split streams or when a WWTP is not achieving a higher class and must distribute a lower class water to corresponding lower class end uses.

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End Uses and Standards		x			Review and address inconsistencies between treatment standards for sewage treatment plant BADCT and the corresponding requirements under the RWQS classes.
End Uses and Standards		x			Review current monitoring standards to determine whether they are adequate to protect human health and appropriate for the corresponding allowed end uses.
End Uses and Standards		x			Review and revise total coliform and E. coli standards.
End Uses and Standards		x			Consider changing total coliform/E. coli standards to match surface water quality standards for full body contact (less conservative is OK), or otherwise justify more stringent standard with science-based risk assessment.
End Uses and Standards		x			Enteric virus standard needs to be reviewed. No commercial Arizona lab is certified to perform this test. Therefore, long delays are experienced when required to perform this analysis. Results may take more than a month, which does not allow correction of the problem in a timely manner.
End Uses and Standards		x			Consider addition of viral surrogates to the standards.
End Uses and Standards				x	Title 18, Chapter 11, Article 303-B1 requires for turbidity monitoring prior to disinfection. In many cases this presents a challenge. Doesn't it make more sense to monitor the finished product once all phases of treatment have been completed? (Performance based) Also, allow for alternate turbidity monitoring locations for systems with separate reclaimed water systems which provide additional disinfection (chlorination).
End Uses and Standards			x		Add an end use standard that allows full body contact.
End Uses and Standards	x		x		Reclaimed water quality standards and monitoring requirements should be consistent with Aquifer Protection Permit requirements.
End Uses and Standards			x		Have the reclaimed water quality standards mirror the same standards under the APP, for example, the 4 of 7 days rule for coliform monitoring.

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End Uses and Standards			x		Instead of defining permissible used of Class A+/A reclaimed water, regulations should define impermissible uses. This would allow precedents to be established for other appropriate uses.
End Uses and Standards			x		Remove allowance for reclaimed water to be used for snowmaking: 1) There was no meaningful consultation with tribes and public when snowmaking was included as an allowable use in the original rule, 2) EPA and ADEQ standards don't require testing and treatment for pharmaceuticals and hormones—revise standards, and 3) ingestion occurs yet no consistent monitoring occurs.
End Uses and Standards			x		The concept of being in compliance 4 of 7 days is unacceptable for categories which include direct human contact.
End Uses and Standards			x		Allow a wastewater treatment plant to produce treated wastewater meeting multiple reclaimed water quality classes for different uses. This would include allowing the wastewater to contain organic nitrogen for agricultural uses.
End Uses and Standards			x		Water quality needs to be met at the point of reuse, not just at the treatment plant due to regrowth in the pipe and influences of open reservoir contamination (lakes), including pesticides, pathogens, and street runoff.
End Uses and Standards			x		If reclaimed water goes for recharge, what classification does it fall under? Testing required to ensure it meets original intended class for disposal.
End Uses and Standards			x		Recognize and enable small rural systems that have limited resources, but which want to use reclaimed water more effectively.
End Uses and Standards			x		Require public notification when reclaimed water is released which does not meet pathogenic standards (for classes which include direct public exposure).
End Uses and Standards			x		Develop reclaimed water quality standards for emerging contaminants such as endocrine disrupting compounds (EDCs) and antibody resistance causing compounds.
End Uses and Standards		x	x		Consider adding direct potable reuse to end uses.
End Uses and Standards			x		Develop new standards and public education programs for direct potable reuse.
End Uses and Standards		x			Define one or more potable reuse classes with strong linkages to requirements in Safe Drinking Water Act rules and permitting to ensure public health

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					protection but not be so stringent to limit utilities to a single treatment process train.
End Uses and Standards		x			Need a higher class of RWQS defined for potable reuse.
End Uses and Standards			x		Direct potable reuse rules should recognize the need for such strategies in rural Arizona and work to encourage such use and to augment supplies with limited alternatives.
End Uses and Standards			x		Allow blending of Class A+/A reclaimed water with stormwater and CAP surface water to create a combined source for treatment at a conventional surface water treatment plant. Determine best approach of permits and water quality standards.
End Uses and Standards			x		Specify conditions under which direct potable reuse can be implemented, such as 1) declared shortage on the Colorado River, 2) decreased flows on other Arizona streams, 3) lack of availability of groundwater, and 4) poor quality groundwater requiring blending.
End Uses and Standards			x		Changes should allow reuse of reclaimed water into the potable system, whether directly to a water treatment plant or other conveyance such as a canal.
End Uses and Standards			x		Reclaimed water planned for direct potable reuse can go through drinking water source water approval. Where source water augmentation is contemplated, water should meet domestic water source designation in surface water quality standards.
End Uses and Standards		x			Not necessary to distinguish between direct and indirect potable reuse if encompassing criteria can be developed that are performance based, so that uses of different technologies are not limited or a certain technology is required that not be appropriate in all situations or might be superseded by better technologies.
End Uses and Standards			x		Require any reclaimed water for both indirect and direct potable reuse to go through treatment/removal of endocrine disrupting compounds (EDCs) and compounds leading to antibiotic resistance.

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End Uses and Standards			x		Standards for reclaimed water should consider background concentrations of contaminants of emerging concern.
Gray Water	x				Review conditions of use for private residential gray water for clarity and fitness.
Gray Water	x				Develop more appropriate general permits for non-residential use of gray water, beyond irrigation.
Gray Water		x			Review residential gray water criteria. In particular, establish criteria to ensure that no gray water is discharged to or ponds on the land surface or otherwise creates a risk of vector-borne disease.
Gray Water		x			Require maintenance of residential gray water systems so that flow is not to the land surface.
Gray Water		x			Need to establish better water quality standards for residential gray water use so that public health is protected.
Gray Water		x			Need to ensure that residential gray water systems are inspected and approved to prevent contamination of potable systems.
Gray Water		x			Need ensure that there is a log of all residential gray water systems so that they can e inspected (once every 5 or 10 years) to protect from source water vectors (think Zika), prevent comingling with stormwater, and protect human health and the environment (excessive salt loading in soil)
Gray Water		x			The rules for residential gray water use need to be revisited as the current permit-less process is not truthful and not working.
Gray Water		x			Make gray water permitting easy so that people will install systems secretly to avoid the red tape.
Gray Water		x			Residential gray water users should have to submit a notice of intent to the administrative authority and pay an administrative fee for registration.
Gray Water		x			ADEQ should delegate permitting of residential gray water to local administrative authorities as ADEQ now does for the permitting of septic tanks and alternative onsite systems.
Gray Water		x			Residential gray water use is regional and the uses and practices are different, therefore the program should be delegated to local county and city authorities.

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Gray Water		x			Develop streamlined gray water permits for commercial and industrial laundries.
Gray Water		x			Integrate gray water use into stormwater use in a manner that protects human health due to microbial and chemical contamination and makes use of the gray water during months of low rainfall (and therefore stormwater).
Gray Water				x	Don't change Arizona's gray water regulations as they were and are the model for other States looking more closely at gray water as a good source of outdoor irrigation.
Gray Water				x	The private residential regulations have served Arizona very well since they were promulgated. We strongly object to any attempt to roll them back.
Gray Water				x	The current graywater provisions under R18-9-711 for residential graywater use should not be changed.
Gray Water				x	The self-permitting process under the current regulations have helped ensure that graywater use and systems are talked about openly among diverse sectors of the community without fear of reprisal. This has fostered trust and openness among the community which is critical for promoting safe use of graywater and best practices. Any further restrictions will lead to systems being installed "under the radar" as was done in the past which is not advantageous for anyone.
Gray Water				x	With regards to the design and installation of residential graywater systems in the state of Arizona, our organization has trained over 250 professionals, taught over a 1000 residents, and installed over 100 residential graywater systems in the Tucson and Phoenix regions. In addition, Tucson Water has approved over 90 applications (as of January 2016) through its residential graywater incentive program with an estimated cumulative water savings of 1,810,795 gallons (6 AF) (Tucson Water January 2016 monthly conservation report). Through 10 years of education, installations, and use of graywater we have not heard or experienced any negative public health aspects resulting from use of a graywater system

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					here in Arizona. There is no need to change the current residential graywater regulations.
Gray Water				x	As stated in a Q&A in the book by Art Ludwig, “Create an Oasis with Greywater”: "Is grey water reuse safe? Yes. There are eight million grey water systems in the US with 22 million users. In 60 years, there have been one billion system user-years of exposure, yet there has not been one documented case of grey water transmitted illness." The current regulations should remain as is.
Gray Water				x	The current regulations are fair, keep the public safe, and promote sustainable use of our scarce water resources.
Gray Water			x		Transfer gray water provisions to separate Article in rule. Gray water regulations should not fall under “reclaimed water.”
Gray Water			x		Gray water permitting needs to be managed by the Local Agency, similar to current delegations by ADEQ of septic tank and alternative onsite system permitting to county health and environmental agencies.
Gray Water			x		Require residential properties with gray water systems to be able to retain all stormwater from a significant rainfall event (10-year, 24-hour, possibly).
Other			x		Need positive public relations campaign to highlight safety and benefits to end uses.
Other			x		Rules should reward innovation, responsible public engagement, and sustainable practices of generators, distributors, and end users of reclaimed water (don’t stifle innovation).
Other			x		Rules should take into account the ability of small systems to afford and maintain innovative wastewater treatment plants and reuse efforts.
Other			x		Put statement in rule that prioritizes funding/funding sources for reclaimed water systems.
Other	x	x	x		Certified operator requirements are necessary for reclaimed water distribution systems. Could use existing Distribution/Collection classifications with special training/certification.

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Other			x		Criteria should be established for operators of reclaimed water systems, even if it requires a baseline Grade 2 certification in drinking water distribution or wastewater collection.
Other			x		Prefer reclaimed water endorsement to current operator certification classification, rather than separate certification classification. Should be under the current drinking water distribution system category, rather than the wastewater collection system category, as distribution of reclaimed water parallels drinking water distribution most closely.
Other			x		Operator certification should be required only if reclaimed water is tied to an Aquifer Protection Permit or Reclaimed Water Permit, otherwise certification should not be required.
Other			x		There should be a confirmation that a certified operator has actually been retained, not just a name and number filed to obtain the permit.
Other		x			Clarify health concern differences between reclaimed water and different types of stormwater (roof vs. asphalt derived). Would different end uses be appropriate dependent on the source?
Other		x			Review and address the monitoring requirements for recharge of treated wastewater under an APP at a groundwater point of compliance (which are extensive) versus the requirements established for allowable end uses under the different reclaimed water classes (which are less extensive but still protective).
Other		x			Is reclaimed water that is recharged considered groundwater when it is pumped out?
Permits/Permitting Process		x			Don't abolish blending permit—it would limit opportunities for flexibility. In fact, consider expanding the scope of the blending permit to address issues such as combining reclaimed and surface waters, providing for additional treatment that doesn't fit the narrow terms of the current blending permit, etc.
Permits/Permitting Process		x			Consider how reclaimed water can be blended with another type of water (i.e., surface water or groundwater) so that it can be distributed for a reclaimed

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					water use currently in Appendix A, other uses not in Appendix A, or as a potable source.
Permits/Permitting Process	x	x			Add provisions for amending the reclaimed water permit, including making simple amendments similar to the major/other/minor amendment processes in APP.
Permits/Permitting Process		x			Clarify terminology or make consistent between ADEQ (reclaimed water) and ADWR (effluent).
Permits/Permitting Process		x			Modernize terminology to reflect the high quality of reclaimed water that is being distributed for reuse (for example, adopt the term recycled water). Further examples include ADEQ's use of the terms sewage treatment plant and wastewater treatment facility when the term water reclamation facility is increasingly being used in the industry.
Permits/Permitting Process		x			For certain uses of Class A+ reclaimed water, consider regulating under a Type 1 permit (no formal application or registration, permittee simply follows criteria specified in rule) as opposed to current regulation under a Type 2 permit (formal submittal of Notice of Intent to ADEQ).
Permits/Permitting Process	x				Review permit renewal periods
Permits/Permitting Process	x				Should the Class A+ permit be redesignated from a Type 2 permit to a Type 1 permit?
Permits/Permitting Process	x	x	x		Agent Permit should be changed to a Reclaimed Water Distribution System permit and required for pipeline distribution systems of reclaimed water to ensure consistent permitting requirements and technical criteria across all distribution systems.
Permits/Permitting Process	x				Should the Blending Facility Permit be abolished?
Permits/Permitting Process			x		The Type 3 Reclaimed Water Agent Permit should be effective for more than 5 years because the reclaimed water quality standards are already incorporated in the Aquifer Protection Permit for the wastewater treatment plant and use is reported annually.

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Permits/Permitting Process			x		End use permits should be effective for the lifetime of the permit and provision should be added for ownership changes. Perhaps an annual fee is feasible.
Permits/Permitting Process			x		Need fast-track or streamlined permitting for systems that meet sustainable practice goals and water management goals set by ADEQ/ADWR.
Permits/Permitting Process			x		Emphasize performance standards over prescriptive standards in permitting—standards over machines.
Permits/Permitting Process			x		Prohibit an HOA from obtaining a Reclaimed Water Agent Permit or to manage a distribution system.
Permits/Permitting Process			x		Do not convert Type 2 end user permits to general permits.
Permits/Permitting Process			x		Prohibit Type 2 end use permit holders from "wheeling" (selling or transferring) reclaimed water.
Permits/Permitting Process			x		Clarify or specify delegation authorities of reclaimed water permits between state and counties.
Permits/Permitting Process			x		Permit should require real time monitoring for upsets.
Permits/Permitting Process			x		Recommend/require backup disposal methods during periods when effluent quality does not meet reclaimed water quality standards (storage, recharge, AZPDES discharge).
Permits/Permitting Process			x		Each reclaimed water system should pass an onsite inspection pending permit renewal.
Permits/Permitting Process			x		A full operational report should be submitted by the operator on an annual basis.
Permits/Permitting Process			x		There needs to be a stringent performance review process, pending each renewal of permit. Trust but verify.
Permits/Permitting Process			x		There needs to be a mechanism for standards enforcement, i.e., annual reports, water quality reports, etc. ADEQ must be willing to be tough on this.
Permits/Permitting Process			x		ADEQ should develop and maintain a central system tracking database for annual reports, system information, test results, etc.
Permits/Permitting Process			x		Need to develop pilot permitting criteria for small direct potable reuse projects.

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Permits/Permitting Process			x		Rules should include spill notification, clean up, remediation, and reporting requirements, similar to Sanitary Sewer Overflow (SSO) procedures.

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