



July Board Mtg Item —  
Utility Vault Permit  
Deadline: June 9, 2006

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June 9, 2006

California State Water Resources Control Board  
Song Her, Clerk of the Board  
1001 I Street  
Sacramento, CA 95814

Subject: Comments & Recommendations to the Draft Utility Vault Permit 2006-XXX-DWQ (No. CAG990002)

Dear Ms. Her:

San Diego Gas and Electric Company (SDG&E) and Southern California Gas Company (SCG) support the State Water Resources Control Board (State Board) staff in its efforts in the proposed Statewide General Permit for Discharges from Utility Vaults and Underground Structures to Surface Waters (Utility Vault Permit). SDG&E and SCG appreciate the State Board's efforts to develop and implement cost-effective and a common sense approach to vault water management. SDG&E and SCG agrees with the State Board's use of a sensible combination of Pollution Prevention Plans (PLANs) and Best Management Practices (BMPs) to ensure a high degree of compliance for utility vault dewatering operations.

**SDG&E and SCG recommend that the State Board adopt the Utility Vault Permit at the July 5, 2006 Board Meeting with the few minor changes noted below;**

## II. Notification Requirements

- Page 1 – II. B. General Permit Coverage

*Comment: Permit coverage will be effective when all of the following have occurred: (1), (2), (3), & (4). For existing Utilities intending to continue coverage under the revised Utility Vault Permit, these requirements are very burdensome, unnecessary and could severely delay the implementation of the PLAN.*

*Recommendation: Since most large Utilities have already submitted NOIs and implemented BMPs and their PLANs, these requirements should apply only to new Utilities requesting coverage under the Utility Vault Permit. If the Utility has changes to its activities or*

operations, then the provisions in section VII. Fii. would require the Utility to make amendments to its PLAN.

## **VII. Provisions**

- Page 8 – C. 3. Best Management Practices and Pollution Prevention Plan (PLAN)

*Comment:* Generally this section of the permit is written in a manner that would be applicable to activities at a specific fixed facility(s). Most of the large Utilities covered by this permit have several hundred-thousand utility vaults, which are located in a service territory that could cover several thousand square miles. Therefore, it would be impossible to implement the requirements of the section to all locations.

For example, the draft permit requires an Inventory and Description of Exposed Materials. Utility vaults are not subject to handling, treating, storing or disposing of exposed materials. Generally, underground vaults do not contain materials that would be exposed to precipitation.

In addition, the draft permit requires inspections of designated equipment and areas on a quarterly basis. Since there are hundreds of thousands of underground utility vaults in the SDG&E and SCG service territories, this requirement for inspections is not practicable or feasible. However, inspections are done on the vaults that are sampled under the Monitoring and Reporting Program (Attachment F).

*Recommendation:* Add "Where Applicable" to section C. 3. Best Management Practices and Pollution Prevention Plan (PLAN).

## **Attachment E – Monitoring and Reporting Program**

### **IV. Effluent Monitoring Requirements**

- Page E-3 – A

*Comment:* Generally pH readings are collected at the vault in the field and when applicable continuously during the time of discharge. This method of pH monitoring is to ensure that the water being discharged from the vaults does not exceed any pH limits for a Municipality during the vault dewatering activity. These pH readings are recorded in the laboratory field notes and are not usually repeated in the laboratory.

*Recommendation:* Allow for field testing of pH to be acceptable for the Effluent Monitoring Requirements or allow for an extended holding time so that the pH of samples can be read when brought back into the laboratory.

Thank you for time and consideration of these comments. If the State Board has any questions regarding these comments and recommendations, please contact me at (858) 637-3726.

Sincerely,

Ronald A. Miller  
Sr. Environmental Specialist – Water Quality

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**Date:** 6/9/2006 9:16:17 AM  
**Subject:** Comments - Utility Vault Dischagre NPDES Permit

Ms. Her

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Thank you

Sincerely

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