(9/23/14) Board Meeting
Draft Drinking Water Systems General Permit
Deadline: 8/19/14 by 12:00 noon

ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7
100 NORTH CANYONS PARKWAY, LIVERMORE, CA 94551-9486 • PHONE (925) 454-5000

RECEIVED
8-19-14
SWRCB Clerk

August 19, 2014

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

[Sent via email to commentletters@waterboards.ca.gov]

Subject: ***Comment Letter – Draft Drinking Water Systems General Permit and Resolution***

Dear Ms. Townsend:

Zone 7 Water Agency is responsible for providing wholesale drinking water to over 220,000 people in the cities of Livermore, Pleasanton, Dublin and a portion of Dougherty Valley in the City of San Ramon. Zone 7 also supplies untreated water to agricultural customers, manages the local groundwater basin and provides both watershed stewardship and flood protection services. Zone 7 has supported the Region 2 task force effort to develop a regulatory framework covering drinking water system discharges through the San Francisco Regional Water Agencies Partners task force led by East Bay Municipal Utility District. The task force has provided both technical input and financial support to Regional Board staff over the last two years. The comment letter submitted by the task force has Zone 7's full support.

Of primary concern to Zone 7 are the task force comments recommending removal of the turbidity numeric action level from the draft permit, recommending a 100,000-gallon volumetric threshold for monitoring of direct discharges, and recommending removal of the Title 22 Maximum Contaminant Levels from the permit. With incorporation of these recommended changes, we believe the permit will protect the beneficial uses of receiving waters through practical regulation.

Zone 7 appreciates the opportunity to provide comments on the draft permit. We recognize the time and effort that State Board staff have put into understanding drinking water system discharges and the management practices already in-use in the industry. Zone 7 fully supports the adoption of a permit that protects beneficial uses of surface waters through practical means appropriate to the low-threat nature of drinking water system discharges.

If you have any questions, please feel free to contact either me at the number above (email jduerig@zone7water.com) or Rhett Alzona at 925 454-5032 (email ralzona@zone7water.com).

Sincerely,

G.F. Duerig
General Manager

cc: Kurt Arends
Jarnail Chahal
Rhett Alzona
Emily Moshier