



(9/23/14) Board Meeting
Draft Drinking Water Systems General Permit
Deadline: 8/19/14 by 12:00 noon
1231 Eleventh St.
P.O. Box 4060
Modesto, CA 95352
(209) 526-7373



August 15, 2014

Board Chair Felicia Marcus
c/o Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear Board Chair Marcus and Members of the Board,
Thank you considering the adoption of a NPDES Permit that will cover all discharges from drinking water systems. The Modesto Irrigation District strongly supports this Permit and your efforts to provide exceptions to the State Implementation Policy and the Ocean Plan for typical drinking water discharges

MID owns and operates the Modesto Regional Water Treatment Plant, which is a 30 MGD surface water treatment plant that treats Tuolumne River water. Commissioned in 1995, the plant receives raw source water from Modesto Reservoir, which also provides irrigation water to the MID canal system from the same outlet works. As a wholesaler to the City of Modesto we have only one service connection.

We periodically discharge raw source water, partially treated raw water and fully treated drinking water directly into the MID canal system and these discharges are then used for irrigation of agricultural lands.

We are writing to ask that the Board consider the following seven changes to the draft Permit:

- Add language that clearly states that wholesalers and transmission mains are covered under this permit.
- Add irrigation of agricultural lands to the list of beneficial reuses.
- Add a categorical exemption from the dechlorination requirement for discharges of potable water which contains less than 4 mg/L of total chlorine when the discharge volume is less than 500 gallons total, because discharges that meet these criteria will not cause an adverse effect on the ecosystem.
- Add language in the permit to make it clear that all water that is dedicated for use as drinking water, from source to tap, is covered under this permit.

- Use drinking water regulations exactly as they are written for compliance and remove all references to averages.
- Use the term “Potable” in a manner that is consistent with drinking water regulations.
- Change the language that states that “discharges are mandatory to meet drinking water regulations” to “discharges due to standard operating practices which are considered Best Management Practices”, because many discharges are not mandated by regulations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick Ryan', with a long horizontal flourish extending to the right.

Patrick Ryan
Modesto Irrigation District
Plant Manager
Modesto Regional Water Treatment Plant
209 526-7656
patrickr@mid.org