

# DEL PASO MANOR *Water District*

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August 14, 2014

#24



State Water Resources Control Board

**Re: Del Paso Manor Water District Comments on Proposed NPDES Permit for Drinking Water System Discharges to Surface Waters**

Honorable Members of the Board:

Del Paso Manor Water District is a municipal water supplier formed under the County Water District Act. We are a small district serving approximately 1,800 residential and commercial customers in northern Sacramento County. The District relies exclusively on groundwater to supply its customers, but is in the process of developing a conjunctive use/surface water utilization program. We appreciate the Board's willingness to develop one statewide permit rather than having nine different permits developed by nine different Regional Boards. The uniformity for the same type of discharges that one statewide permit will bring is needed. In reviewing the draft permit, overall we feel this permit is less confusing, much more manageable and hopefully will be more cost efficient, monetarily and in staff resources. We endorse comments provided by the Association of California Water Agencies with respect to the draft permit. However, as a small public water supplier, we write to provide comments on aspects of the draft permit which, we believe, do not adequately or accurately address the limited resources small water agencies have. Primarily, our concerns are with the Notice of Intent and the monitoring and reporting implementation.

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1. The Draft Permit's Notice of Intent requests information that may not be available, especially in small agencies. An example is a "site schematic" identifying receiving waters including alignment of storm water collection system. My District does not maintain the storm water collection system and therefore do not have maps showing their alignment. To provide this information, we would need to hire a surveyor to map out the County of Sacramento's storm water system. The NOI also asks for information on the receiving water such as "is it listed on the current 303d list." Since I am unfamiliar with where the storm drain ends up, I could not answer this question. I believe this may be an issue for many small agencies that do not have the resources to access this information.

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2. With the monitoring and reporting, Del Paso Manor Water District requests better clarification and the threshold limits being revised. An example is Section C should clarify that the frequency of sampling under this section is for monitoring discharges as described

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in Section A. Additionally, we realize pH is a factor in protecting aquatic life in rivers; however, it is impractical for a water purveyor to adjust pH in a discharge; therefore, pH sampling should be eliminated in the monitoring requirements. Instead require BMP's for direct discharges only if the water purveyor's water normally exceeds a certain level.

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cont.

Again, we commend the Board in developing a statewide permit for low threat discharges which takes into account mandated responsibilities of water purveyors to protect public health and safety and does not create an undue hardship for compliance.

Thank you for addressing these concerns in the final NPDES permit.

Sincerely,



Debra Sedwick  
General Manager