

April 19, 2019

Mr. Augustine Anijelo
Los Angeles Regional Water Quality Control Board
320 West 4th St, Ste. 200
Los Angeles, CA 90013

Dear Mr. Anijelo,

Subject: Comment Letter – Tentative Waste Discharge Requirements – General NPDES Permit for Discharges of Low Threat Hydrostatic Test Water to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (General NPDES Permit No. CAG674001)

The Los Angeles Department of Water and Power (LADWP) would like to thank the Regional Water Quality Control Board (RWQCB) for the opportunity to comment on the Tentative Waste Discharge Requirements – General NPDES Permit for Discharges of Low Threat Hydrostatic Test Water to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (General NPDES Permit No. CAG674001).

As the largest municipal utility in the United States, LADWP must maintain its Water and Power Systems to maintain reliability. Hydrostatic testing is a large part of confirming the infrastructure is free of leaks and secure. LADWP will be impacted by this proposed permit in providing continued reliable service to its customers. In addition, as a proponent of environmental sustainability and accountability, LADWP takes serious our responsibility to conduct our operations in an environmentally safe and compliant manner.

LADWP has reviewed the RWQCB's tentatively issued proposed Permit pertaining to low threat hydrostatic test waters. LADWP appreciates the opportunity to provide comments on the document, as detailed below.

1. Section II Notification Requirements, A. Eligibility Criteria, 3 New and Existing Discharges. Page 4.

This requirement of the proposed permit would require all new and existing dischargers to obtain coverage under this new hydrostatic test water permit. Clarification is needed to ensure this permit is not required if already regulated under the exiting Statewide General National Pollutant Discharge Elimination System (NPDES) Permit.

This requirement appears to be duplicative with the State Water Resources Control Board (SWRCB) Order No. WQ 2014-0194-DWQ regulating potable water discharges for Community Drinking Water Systems who are already enrolled under the SWRCB order. The SWRCB permit allows for the permitted Community Water System permittees to discharge hydrostatic test water from repairs, maintenance and installation of Transmission and Distribution system piping within their system in both planned and unplanned situations. In fact when this Statewide permit was issued, the RWQCB terminated all existing LADWP hydrostatic test water permits associated with its potable water distribution system that were currently in place with the RWQCB and were listed in LADWP's issued Notice of Applicability.

LADWP requests clarification and that this section of the eligibility requirements include the following new language in addition to that already indicated in Item 3.

3. New discharges and existing discharges that are regulated under existing General or Individual NPDES Permits (Individual Permits) and which meet eligibility requirements may be regulated under this Order. Community Water Systems holding coverage under SWQCB Order No. 2014-0194-DWQ would be exempt from obtaining a separate hydrostatic test water discharge permit under this Order for any ongoing repair, maintenance and installation projects associated with their Transmission and Distribution systems. Other activities of the Community Water Systems not related to potable water distribution and transmission would fall under this order.

2. Section II Notification Requirements, A. Eligibility Criteria, 2a. Demonstrate Pollutant Concentrations. Page 4

In February 2019, LADWP and the City of Los Angeles Bureau of Sanitation announced a multi-agency effort to recycle the City's wastewater supply with milestones by 2035. In an effort to expand the opportunity for use of recycled water in place of high value potable water, LADWP is recommending the option to use Disinfected, Tertiary Treated Recycled Wastewater as a replacement for potable water when performing hydrostatic testing of recycled water lines and infrastructure. This would eliminate potable water use from recycled water projects. When recycled water can be tested and confirmed to not cause a violation of any applicable water quality objective for receiving waters, it should be allowed as a viable replacement for potable water hydrostatic testing.

LADWP requests that Item 2a. also include a new reference to disinfected, tertiary treated recycled water as an allowed hydrostatic test water for recycled water systems.

- 2a. Demonstrate that pollutant concentrations in the discharge shall not cause violation of any applicable water quality objective for the receiving water, including discharge prohibitions. This includes the use of disinfected, tertiary treated recycled water for use in hydrostatic testing of recycled water infrastructure projects where testing confirms that no violations would be caused with its use.

3. Section II, A – Eligibility Requirements 2c., Page 4

This section of the eligibility requirements identifies that a discharger must provide mitigation measures that will be implemented if the hydrostatic testing process causes pollutants to be introduced into the test water. The use of the term mitigation does not seem appropriate. In this instance it appears that the permit is requesting that treatment be applied to any test water that has had pollutants introduced in order to remove these pollutants prior to discharge. Since the discharge may need treatment, such as dechlorination or pH adjustment, the term treatment should be used instead of mitigation.

LADWP requests that the term mitigation in Item 2c. be replaced with the term treatment to make it clear that treatment/removal of the pollutants is required in this instance.

**4. Section G – Construction, Operation and Maintenance Specifications.
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Based on the low threat and unlikely event that treatment of hydrostatic test waters will be required, the inclusion of an Operations and Maintenance (O&M) manual for treatment seems excessive for this permit. Possible treatment scenarios for hydrostatic test water would likely include dechlorination and pH adjustment only for one time discharges with nonfixed treatment units. These treatments are usually conducted in situ during a discharge and are done throughout industry as a standard operating procedure.

LADWP request that Section G be removed or stated as Not Applicable in this permit.

5. Section III Findings, B. Discharge Category Descriptions, Item 4 and 5. Page 7

Items 4 and 5 of this section indicate that no dilution credits or mixing zones will be established as part of the General Permit, and if sought after, these issues would necessitate an individual permit be issued instead. Due to the potential changing status of many of the existing waterways in the Los Angeles Region due to weather changes, there could be instances where dry streams and creeks have flowing water. These changing flow conditions could necessitate a potential mixing zone or dilution credits in some instances and the option to maintain coverage under the General Permit with rider options for these issues would be beneficial to the permittees and the Regional Board. Individual permits would not seem appropriate since these are one time discharges and not ongoing operations.

LADWP requests that mixing zones and dilution credits be maintained as an option within the General Permit that would be addressed and used on a case by case basis.

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In closing, LADWP looks forward to working with the RWQCB staff to finalize this Permit. Should you have any further questions regarding this letter or need more information, please contact Mr. Michael Hanson of the Wastewater Quality and Compliance group at 213-367-0634.

Sincerely,



Katherine Rubin
Manager, Wastewater Quality and Compliance
Los Angeles Department of Water and Power

MH:

c: Mr. Gensen Kai, RWQCB
Mr. Michael Hanson, LADWP