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Cc: [Bell, Janet J](#)
Subject: "Comment - Tentative Order No. R9-2013-0001, Regional MS4 Permit, Place ID: 786088Wchiu"
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January 11, 2013

Sent Via E-Mail

Attention: Mr. Wayne Chiu, P.E.
wchiu@waterboards.ca.gov

California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4353

Subject: Metropolitan Water District of Southern California – “Comment – Tentative Order No. R9-2013-0001, Regional MS4 Permit, Place ID: 786088Wchiu”

Dear Mr. Chiu:

The Metropolitan Water District of Southern California (MWD) appreciates the opportunity to comment on subject Tentative Order No. R9-2013-0001, Regional MS4 Permit (MS4 Tentative Order). MWD is a consortium of 26 cities and water districts that provides drinking water to nearly 19 million people in parts of Los Angeles, Orange, San Diego, Riverside, San Bernardino, and Ventura counties. MWD delivers an average of 1.7 billion gallons of water per day to a 5,200 square mile service area. Our facilities include the Colorado River Aqueduct, pumping plants, treatment plants, reservoirs, tunnels, pipelines and hydroelectric plants. MWD is enrolled under the current 2010 San Diego Regional Water Quality Control Board's (SDRWQCB) General Permit, Order No. R9-2010-0003 (Existing General Permit), which captures dewatering, hydrostatic testing, and related potable water discharges for our Skinner Water Treatment Plant and water supply pipelines under the jurisdiction of the SDRWQCB.

To ensure continuous safety and protection of water supplies, MWD, our member agencies, and other water supply purveyors must perform various routine operations and maintenance activities that result in planned drinking water system releases of potable water, raw water, or low volume releases. These activities include, but are not limited to, routine dewatering/flushing of distribution systems for maintenance, cleaning and lining of pipe sections, pipeline disinfection, reservoir repairs and reservoir cover cleaning, and hydrostatic testing. Additionally, MWD and other water purveyors may also have unplanned releases that include pipeline breaks, leaks, overflows, and emergency flushing activities.

Comments

In the MS4 Tentative Order, MWD has noted that non-storm water discharges from water purveyors are categorized as “illicit” discharges. We understand the rationale for the MS4 Tentative Order using the term “illicit discharges” to define any discharges to an MS4 that are not composed entirely of storm water, and are not covered under a separate NPDES permit. However, we feel that use of another category would be more appropriate to describe these potable water discharges. Such a category could be similar to those included in the recently adopted Los Angeles Regional Water Quality Control Board’s MS4 Permit (e.g. “conditionally exempt essential non-storm water discharges,” or “authorized non-storm water discharges separately regulated by an individual or general NPDES permit”).

Additionally, the MS4 Tentative Order references Order No. R9-2010-0003, which covers all discharges from water purveyors and community water systems. MWD has reviewed the MS4 Tentative Order against the Existing General Permit, and the abbreviated language in the MS4 Tentative Order is not consistent with the language used to describe these covered discharge in the Existing General Order. The MS4 Tentative Order needs to be consistent with the authorized discharges from water purveyors and community water systems that are captured in the Existing General Permit. As such, MWD staff recommends that SDRWQCB revise the language in the MS4 Tentative Order that applies to water purveyors and community water systems as follows:

Section E – Jurisdictional Runoff Management Programs, 2. Illicit Discharge Detection and Elimination, a. Non-Storm Water Discharges

Item (2) – Current Language: “Discharges of non-storm water from water line flushing and water main breaks to the MS4 must be addressed as illicit discharges unless the discharge has coverage under NPDES Permit No. CAG 679001 (Order No.R9-2010-0003, or subsequent order). This category includes water line flushing and water main break discharges from water purveyors issued a water supply permit by the California Department of Public Health or federal military installations. Discharges from recycled or reclaimed water lines to the MS4 must be addressed as illicit discharges under a separate NPDES permit.”

Item(2) – Suggested Revision: **“Discharges of non-storm water from water purveyors and community water systems are authorized discharges, and are not considered illicit discharges, if the discharger is enrolled and regulated under an individual or general NPDES permit, such as NPDES Permit No. CAG 679001 (Order No. R9-2010-0003, or subsequent order). This category includes those discharge activities described in Order No. R9-2010-0003, which includes but is not limited to the following: discharges resulting from repair, maintenance, and disinfection of pipelines, tanks, vessels, and reservoirs dedicated to drinking water purveyance and storage, and hydrostatic test water discharges resulting from testing of pipelines, tanks, and vessels that are dedicated to drinking water purveyance and storage.”**

Please contact Janet Bell at (213) 217-5516 or via email at jbell@mwdh2o.com, if you have any questions.

Thank you,

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