

EXECUTIVE OFFICER SUMMARY REPORT
December 16, 2009

- ITEM: 13
- SUBJECT: NPDES Permit Reissuance: General Waste Discharge Requirements for the Discharges of Hydrostatic Test Water and Potable Water to Surface Waters and Storm Drains or Other Conveyance Systems within the San Diego Region (Tentative Order No. R9-2009-0094, NPDES Permit No. CAG679001) (Michelle Mata)
- PURPOSE: To adopt Waste Discharge Requirements and NPDES Permit for the discharge of hydrostatic test water and potable water to surface waters within the San Diego Region.
- PUBLIC NOTICE: A public notice of the tentative order was published in the San Diego Union Tribune on June 28, 2009. Copies of the tentative order were mailed on June 25, 2009 to all enrollees and all known interested parties and agencies. Copies were made available for public review at the Regional Board office on June 25, 2009. The tentative order was also posted on the Regional Board's web site on June 25, 2009.
- DISCUSSION: On August 14, 2002, the Regional Board adopted Order No. R9-2002-0020, NPDES No. CAG679001, General Waste Discharge Requirements for Discharges of Hydrostatic Test Water and Potable Water to Surface Waters and Storm Drains or Other Conveyance Systems. Tentative Order No. R9-2009-0094 would, if adopted, supersede and replace Order No. R9-2002-0020. Regional Board staff met with representatives of potable water distribution agencies on July 20, 2009 and July 23, 2009 to discuss the tentative requirements and address any concerns the agencies may have with requirements contained in the tentative Order.
- Water distributors (also called purveyors), water districts, municipalities, and private entities need to conduct periodic repair and maintenance work on their distribution system, which in most cases results in discharges of potable water to various receiving waters within the San Diego Region. Repair and maintenance

work may include water line draining for addition of new service connections, draining for internal inspections, draining for valve replacements, or water line flushing for water quality reasons to address public health issues. Hydrostatic testing of pipelines, tanks and vessels dedicated to drinking water is also conducted.

Certain constituents potentially contained in potable water and/or hydrostatic test water discharges threaten to cause or contribute to excursions above narrative and numeric water quality objectives contained in state and federal regulations. These types of discharges could therefore pose a chronic or acute toxicity risk to freshwater and saltwater aquatic animal and plant life. For example, hydrostatic testing of pipelines, tanks, etc., often results in the production of super-chlorinated water that is needed for the initial disinfection. Super-chlorinated water can have a chlorine concentration of more than 25 milligrams per liter (mg/L). In drinking water, the Maximum Disinfecting Residual Level (MDRL) is set by the Department of Health Services at 4 mg/L. Typically, the chlorine concentration in drinking water ranges from 0.5 to 2.5 mg/L. However, the acute sensitivity of freshwater species, when exposed to total residual chlorine, ranges from 0.028 mg/L to 0.7 mg/L (*Quality Criteria for Water, 1986*). Other constituents of concern include disinfection byproducts such as trihalomethanes (THMs), total dissolved solids, total suspended solids, and metals.

Order No. R9-2002-0020 requires enrollees to establish a set of Best Management Practices (BMPs) to address discharges associated with hydrostatic test water and potable water. BMPs include source control BMPs to minimize contact between pollutants and flow (e.g. rerouting of flow to prevent the discharge, erosion, which can lead to sedimentation in discharge) as well as treatment control BMPs to remove pollutants present in the discharge water before it enters receiving waters, including storm drains and other conveyance systems. The tentative Order requires compliance with minimum BMPs as previously established in Order No. R9-2002-0020.

Prolonged and continuing drought conditions have made water conservation a crucial consideration with respect to water supply. The discharge of millions of gallons of water by potable water distribution agencies has been a concern of the public and of this Regional Board. The agencies have expressed that conservation

of water is a high priority and thus only discharge water when needed to maintain the system or for protection of public health.

Effluent and receiving water limitations from Order No. R9-2002-0020 have remained essentially unchanged.

To date, the Regional Board has received initial written comments from the Technical Advisory Committee (TAC). The TAC is comprised of staff from the San Diego County Water Authority and its 24-member agencies. Additional comments have been received from the Metropolitan Water District of Southern California, City of Del Mar, Olivenhain Municipal Water District, Padre Dam, Eastern Municipal Water District, Irvine Water District, Helix Water District, Sweetwater Authority, and Carlsbad Municipal Water District. A Supplemental Response to Comments Document and Revised Errata will be prepared and submitted with the supplemental mailing.

**SIGNIFICANT
CHANGES:**

The following areas in Tentative Order No. R9-2009-0094 differ from the current Order No. R9-2002-0020:

1) Dischargers shall submit an annual report which outlines water distributed throughout the year, total volume of planned discharges throughout the year, and total volume of unplanned discharges throughout the year.

2) Discharges under 500,000 gallons/day are exempt from the MRP of Order No. R9-2002-0020. With consensus from the TAC, this number has been reduced to 1 acre-ft/day (325,850 gallons/day) in the tentative Order to more closely match the volume of water discharged by the water agencies.

3) The Monitoring and Reporting Program has been modified to require the Enrollees to develop an Effluent Characterization Plan. This plan is required to collect information to adequately analyze effluent from the Enrollees distribution system for compliance with California Toxics Rule criteria. Preliminary data indicates there may be certain constituents (including THMs and metals) in the drinking water that do not conform to the CTR water quality objectives. The data is needed to further evaluate this potential issue.

COMPLIANCE:

Not Applicable

LEGAL ISSUES: None

SUPPORTING DOCS: 1. Transmittal Letter for Revised Tentative Order No.
R9-2009-0094
2. Revised Tentative Order No. R9-2009-0094

RECOMMENDATION: Adoption of Revised Tentative Order No. R9-2009-0094 is recommended.