



SWEETWATER AUTHORITY

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August 10, 2009

GOVERNING BOARD

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Item No. 13
Supporting Document No. 13

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

Subject: Draft Tentative Order No. R9-2009-0094 NPDES Permit No. CAG679001

Dear Mr. Robertus:

Sweetwater Authority (Authority) understands that the Regional Board is postponing consideration of the subject tentative order from the August 12, 2009 Board meeting to a future Regional Board meeting. The Authority appreciates this action as we believe the proposed order is not complete, and that a minimum of ninety (90) days are needed to provide sufficient time to continue working with your staff through the Technical Advisory Committee (TAC) on unresolved areas of the tentative order.

Some major items that have been resolved are the elimination of the mandatory approval of the MS4 operator prior to allowing a drain to occur and the discussion regarding discharges under the one acre-foot/day (325,850 gallons/day) would be exempt from monitoring and reporting criteria. However, other concerns in the tentative order that have not been fully addressed are:

- receiving waters limitations
- monitoring and reporting criteria
- reporting of conservation goals for discharges
- hydrostatic testing of new oil and gas facilities and reclaimed water systems

I am aware of the positive efforts that your staff has made in the time available; however, as the tentative order reads now, it is restrictive in how we would carry out daily operations, it limits our ability to operate, and will cause undue hardship on water purveyors and their customers.

We believe that the TAC and RWQCB staff can craft mutually acceptable solutions. If you have any questions, please contact William Olson, Director of Distribution at (619) 409-6852.

Sincerely,


Mark Rogers
General Manager

cc: James L. Smyth, Operations Manager, Sweetwater Authority
William Olson, Director of Distribution, Sweetwater Authority
Michelle Mata, Regional Water Quality Control Board
Brian Kelly, Regional Water Quality Control Board

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