

EXECUTIVE OFFICER SUMMARY REPORT
September 8, 2010

- ITEM: 9
- 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. R9-2010-0003, NPDES Permit No. CAG679001) (*Michelle Mata*)
- PURPOSE: To reissue a general 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 Orange County Register, San Diego Union Tribune, and The Press-Enterprise on June 25, 2010. Copies of the tentative Order were sent via electronic mail on June 25, 2010 to all enrollees and all known interested parties and agencies. Copies were made available for public review at the San Diego Water Board office on June 25, 2010. The tentative order was also posted on the San Diego Water Board's web site on June 25, 2010.
- DISCUSSION: **Current Receiving Water Quality Conditions**
This tentative Order is a general NPDES permit covering discharges associated with hydrostatic test water and/or potable water that may occur to various water bodies throughout the San Diego Region. Enrollees under the general permit will be required to monitor the receiving waters for direct discharges to surface waters to ensure protection of beneficial uses and water quality objectives at the point of discharge.
- Environmental Outcome of Tentative Order**
Because this tentative Order is a reissuance of an existing NPDES permit with minor modifications, the effects on the environment will be negligible. The requirements, including controls on discharges of chlorinated water and implementation of Best Management Practices (BMPs) for prevention of excessive erosion from

hydrostatic/potable water discharge events, have been carried over to the proposed tentative Order.

Background

On August 14, 2002, the San Diego Water 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 Within the San Diego Region*. Tentative Order No. R9-2010-0003 would, if adopted, supersede and replace Order No. R9-2002-0020.

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.

At its December 16, 2009 meeting, the San Diego Water Board was scheduled to consider adoption of tentative Order No. R9-2009-0094 (subsequently renumbered R9-2010-0003). The San Diego Water Board heard testimony from staff, enrollees, and other interested persons. After closing the public hearing, the San Diego Water Board directed staff to continue discussions with enrollees to resolve various concerns the enrollees had with the requirements contained in the tentative Order.

San Diego Water Board staff held a public workshop on January 27, 2010 to obtain additional comments and input from enrollees and other interested parties. Approximately 23 agencies from San Diego County, South Orange County, and Riverside County attended the workshop. Revisions were made to the tentative Order to incorporate comments received during the public workshop and on April 27, 2010 the San Diego Water Board staff met with members of the stakeholder Technical Advisory Committee (TAC) to review the changes. The TAC members have indicated that are in agreement with the changes made and have no additional comments on the tentative Order as modified.

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

To date, the San Diego Water Board has received one comment from Eastern Municipal Water District (Supporting Document No. 2). A response to comments document has been prepared and provided as Supporting Document No. 3.

**SIGNIFICANT
CHANGES:**

The following areas in Tentative Order No. R9-2010-0003 differ from current Order No. R9-2002-0020:

1. The tentative Order has a new look based on the statewide template for NPDES permits. While each region is unique, there are many aspects of NPDES permits that can be standardized. Since 2004, staffs of the state and regional water boards, along with USEPA's contractor, have embarked in standardizing NPDES permits in the state.
2. With consensus from the TAC, the volume of discharge water exempt from the Monitoring and Reporting Program has been reduced from 500,000 gallons per day (GPD) to 320,850 GPD (or 1 acre-ft/day).
3. Reporting frequency has been reduced from quarterly to annual. Annual reporting parameters have been added to include the total volume of water distributed throughout the year, total volume of planned discharges throughout the year, and total volume of unplanned discharges throughout the year.

COMPLIANCE: Not Applicable

LEGAL ISSUES: None

SUPPORTING DOCS:

1. Revised Tentative Order No. R9-2010-0003
2. Comment from Eastern Municipal Water District
3. Response to Comments Document
4. Transmittal Letter for Response to Comments Document and Revised Tentative Order (August 25, 2010)

RECOMMENDATION: Adoption of Revised Tentative Order No. R9-2010-0003 is recommended.