

## Glendenning, Susan@Waterboards

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**From:** Pablo Ramudo <pramundo@nmwd.com>  
**Sent:** Monday, June 23, 2014 4:54 PM  
**To:** Glendenning, Susan@Waterboards  
**Cc:** cdegabriele@nmwd.com  
**Subject:** Proposed Permit and Tentative Order R2-2014-XXXX: General Waste Discharge Requirements for Discharges of Water from Drinking Water Supply Distribution, Transmission, and Groundwater Systems

Ms. Glendenning

North Marin Water District is a Public Water System serving drinking water to approximately 65,000 residents of Novato, Point Reyes Station, Olema, Inverness Park, Paradise Ranch Estates, and other unincorporated parts of Marin and Sonoma Counties. North Marin Water District strives to provide safe and reliable drinking water while taking practical measures to protect the environment. For several years we have implemented best management practices to eliminate chlorine in our water from reaching receiving waters during necessary discharges. Additionally, we have chosen to use ascorbic acid as a dechlorination agent because it does not decrease oxygen levels in streams the way other approved dechlorinating chemicals can.

We are concerned about requirements of the proposed permit that will place undue burden and significant limitations on our ability to meet our obligation to provide safe and reliable drinking water without providing any increased protection to beneficial uses.

Monitoring requirements for turbidity and chlorine when BMPs are already in place to mitigate their effects diverts critical resources from timely response to correcting and repairing distribution system failures such as water main breaks and tank overflows.

The field method proposed for chlorine analysis is prone to error at the proposed reporting limit for water that contains turbidity and metals that commonly accumulate in distributions systems (iron and manganese). These field meters may serve adequately to approximate the concentration of chlorine in clear water but do not provide the accuracy that would be necessary to comply with the stated numeric limits without causing false positives under the conditions encountered in the discharges regulated by this proposed permit.

North Marin Water District urges the San Francisco Regional Water Quality Control Board to modify the proposed permit in the following ways as they relate to chlorinated water:

- Eliminate the chlorine monitoring and reporting requirement for all unplanned discharges.
- Eliminate the chlorine reporting requirements for planned discharges, leaving analysis of chlorine post-BMPs as a reasonable check for efficacy and modification of BMPs
- Eliminate the turbidity action level for trench dewatering and rely on BMPs for control of turbidity and sediments.

North Marin Water District appreciates the opportunity to provide comments these comments. Should you have any questions or require additional information please feel free to contact me.

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North Marin Water District

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