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Metropolitan Water District

Permit Overview and Compliance Expectations

New Statewide Permit for Drinking Water System Discharges To Surface Waters

Diana Messina, Supervising Engineer
Renan Jauregui, Water Resource Control Engineer
State Water Resources Control Board

Intent of Presentation

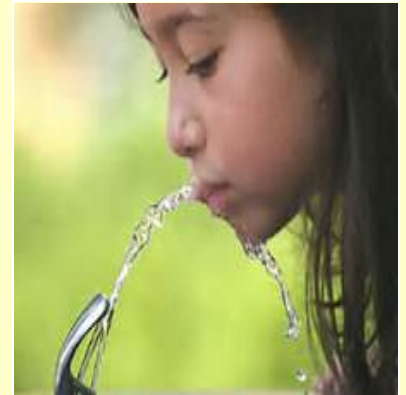
- **Overview of permit**
 - **How to make this permit serve your regulatory needs**
 - **How to Comply with the permit**
 - **Incentives to work together with other local utilities for water conservation**

Regulatory Compliance

Familiar to Drinking Water System Operators



Federal
Safe Drinking Water Act
and
California
Health and Safety Code



Administered through your system's Division of Drinking Water permit

*To assure Drinking Water System water served to your customers
is safe for their public health*

What is this New Statewide Permit?

An NPDES Permit based on the

Federal **Clean Water Act** *and* *California* **Water Code**



Administered through the State Water Board's Division of Water Quality permit

To assure discharges from your Drinking Water System water that flows into surface waters is safe for beneficial uses of those waters, including aquatic life

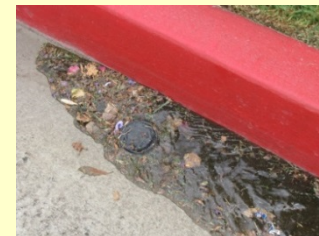
National Pollutant Discharge Elimination System
NPDES Permit

Basic Water Quality Concerns from Drinking Water System Discharges

- **Toxicity from chlorine, metals & change in receiving water ambient pH**



- **Solids in form of sediment, turbidity, sand and trash**



Basic Water Quality Concerns from Discharge Velocities

- **Erosion and hydro-modification through scour**

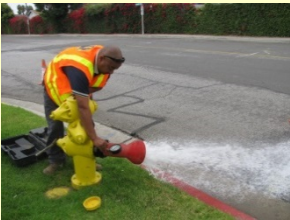


Type of Discharges Are Covered by this Permit?

- **Planned discharges resulting from activities mandated by the federal Safe Drinking Water Act, Health and Safety Code, and Division of Drinking Water Permit**
- **Discharges from:**
 - **Transmission Systems and Lines**
 - **Supply wells**
 - **Water treatment plants or facilities (excluding filter backwash)**
 - **Distribution Systems**
 - **Storage Systems**
- **Emergency and unplanned discharges**

Types of Discharges Regulated By Permit

- Planned discharges that allow management practices to be put in place
- Whether routed to storm drain system or discharged directly to surface water



- Emergency discharges



How Does This Permit Serve A Water Purveyors Needs?

- This NPDES Permit provides water purveyors with required Clean Water Act regulatory coverage for mandated discharges and emergency discharges
- The water purveyor is permitted by the State Water Board to discharge to waters of the U.S. per the requirements of the permit
- This permit sets consistent water quality requirements for discharges statewide
- This permit does not interfere with local storm water agency authority (this is not a permit to discharge into a storm drain)

What Else Does This Permit Do for Water Purveyors?

- This permit provides a regulatory exception to the California Toxic Rule and Ocean Plan Objectives
- The California Toxic Rule and Ocean Plan sets stringent criteria for over 126 pollutants including metals and chlorine byproducts
- The State Water Board grants water purveyors that are covered under this permit an exception to California Toxic Rule and Ocean Plan Objectives

Note – this is not an exception to the Clean Water Act

- The exception does not apply to commingled storm water

Effluent Requirements in Permit

- Chlorine Effluent Limits
 - A **total chlorine** of 0.019 mg/L (non-ocean discharges)
 - 0.08 mg/L (ocean discharges)
- Compliance assessed by a field meter monitoring result of **<0.1 mg/L (non-detect)**
- Only applicable to superchlorinated discharges, direct discharges, or discharges within 300 ft from a water of the U.S.
- Turbidity Action Level (non-ocean discharge)
- Turbidity Effluent Limit (ocean discharge)
- Best Management Practices (BMPs)

Best Management Practice-focused Permit

- Implement Best Management Practices to protect beneficial uses of receiving surface water



- Monitor
- Report annually
- Keep records



Permit Requires Existing Proven Management Practices

- Permit does not specify which Best Management Practices
- Select specific practices that protect beneficial uses from your discharge



Permit Requires Existing Proven Management Practices

- Same for ground water supply operations
- Select specific practices that protect beneficial uses from your discharge



Permit Acknowledges Coverage Under Existing MS4 Permits

State Water Board not requiring the following to enroll in statewide permit:

- A water purveyor that is also a municipal storm water permittees
- A water purveyor that have an established local agreement with municipal storm water permittee, and concurrence with their regional water board
- A water purveyor whose discharges do not enter waters of the U.S.

Compliance Monitoring Requirements

- **Compliance monitoring involves field monitoring only**
- 1. Event monitoring for discharges with greater perceived threat**
 - **Discharges due to well development and rehabilitation**
 - **Superchlorinated discharges**
 - **Discharges greater than one acre-foot**
- 2. Once-per-year representative monitoring**
 - **One representative monitoring sample represents other discharges of same:**
 - **general source**
 - **treatment and**
 - **management practices**

Monitoring, Reporting and Notification Requirements

- Visual receiving water monitoring only for direct planned discharges that are non-compliant
- No monitoring for emergency discharges or non-surface water discharges
- Annual reporting to State Board
- Immediate reporting when non-compliance may potentially adversely impact beneficial uses of receiving waters
- Pre-notification to Regional Water Quality Control Board of large size discharges
- Post notification of emergency discharges

Immediate Notice Requirements

By September 1, 2015

- **Submit a Completed Application Package including Notice of Intent (Att. B-1 of permit), OR**
- **Submit a Completed Notice of Non-Applicability**
 - (Att. B-2 of permit)
 - *Your water agency is storm water (MS4) permittee that holds a storm water NPDES permit (i.e. City, County) and all your discharges enter the MS4 system*
 - *Your water agency has an established local agreement with the storm drain agency and all your system discharges enter the storm drain system (no direct discharges to surface waters)*
 - *Your water system does not discharge to a water of the U.S.*
 - *Your discharge to a water of the U.S. is federally exempt*

Promoting Multiple Uses for these Good Quality Discharges



- Incentives to work with storm water entity to route water to:
 - Ground water recharge facilities
 - Low impact development facilities



- Reuse



Promoting Multiple Uses for these Good Quality Discharges



- **Permit Incentives**

- Permit coverage also serves as waste discharge requirements
- No monitoring for portions of discharges that do not discharge to surface waters (waters of the U.S.)



Note – discharge to a dry creek bed is a discharge to a water of the U.S. and an NPDES discharge. Not considered a beneficial use per this discussion.

Seek Opportunities for Collaboration Among Local Drinking/Storm Water Agency

- **Large volume discharges create un-natural pulses in storm drain systems during dry weather creating high-concentration storm water**
 - Route flows to green streets, parking lots, other low impact development (LID) infrastructure
- **During drought**
 - Difficult to view discharges as *de minimus* discharges in terms of needed water supply
 - Drinking water discharges may serve as conservation when routed to LID, especially those systems that overlay ground water basins and fractured bedrock
- **Continue Integrating local water management**
 - Incentivized through CA Water Action Plan (Actions 2 & 10) and Proposition 1 funding incentives

**For Further Information
Come to a Permit Implementation Workshop or
Request a Permit Implementation Workshop in Your Area**

http://www.waterboards.ca.gov/water_issues/programs/npdes/drinkingwatersystems.shtml

Contact

Renan Jauregui

renan.jauregui@waterboards.ca.gov

Russell Norman

russell.norman@waterboards.ca.gov

Diana Messina

diana.messina@waterboards.ca.gov