



RESPONSE TO "STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT FOR DRINKING WATER SYSTEM DISCHARGES"

Under the EPA "Safe Water Drinking Act" Public Water Systems (PWS) are required to provide safe drinking water to consumers. As a part of this law PWS are required to maintain safe minimum chlorine disinfectant residual levels and remove disinfectant byproducts (DBPs) from the system. Maintaining these safe levels is important to inhibit the growth of microbial activity in the system and remove the DBP toxins that can cause numerous health issues. In order to maintain these safe residual levels and remove DBPs, especially on dead-end mains in the distribution system, PWS flush old water with low residuals and DBPs in order to bring in new water with higher/safe residual levels. This is usually accomplished by manually opening fire or flushing hydrants for a period of time. Manually flushing hydrants, while raising residual levels, is usually an inefficient way of addressing the low residual issue as it provides no technological way to monitor the flushed water in order to gauge residuals as the hydrant is flushing and in turn wastes a great deal of water in the process. Fortunately, there already exists EPA approved (Green Project Reserve Funding Program) Intelligent and Automatic Flushing Station technology that can automatically flush lines and/or monitor residuals to flush the exact amount of water needed to maintain safe residuals and reduce the amount of total flushed water by up to 50% (<http://www.epa.state.il.us/water/financial-assistance/publications/green-project-reserve-guidance.pdf>). Keeping water safe while maximizing water conservation should always be the goal, but especially during extreme drought periods such as California is experiencing at this time. Many systems around the United States and Canada have been using this technology for over a decade.

Unfortunately, the provisions in the EPA "Clean Water Act" are now conflicting with the requirements of the "Safe Water Drinking Act" limiting or placing restrictions on flushing water mains to ensure compliance. It would behoove regulators to include language into the "Statewide General National Pollutant Discharge Elimination System Permit for Drinking Water System Discharges" to exempt PWS that utilize this new flushing technology from obtaining permits as the total water flushed to keep consumer water safe using these methods is negligible in comparison to manual flushing or other types of discharges into sewer systems. Setting a minimum flush level (e.g. 2,250 gallons per day, per site) whereby PWS are exempt from acquiring a MS4 permit would go a long way in assisting PWS in complying with the "Safe Water Drinking Act". If unable to exempt, then the rule should enable PWS that use this new flushing technology to flush directly into a sanitary sewer system in order to recapture and reuse flushed water or to a below-grade French drain.

It is important to make provisions to help PWS easily comply with the "Safe Water Drinking Act" in order to maintain safe drinking water for consumers. Maintaining safe residuals and removing old water in distribution systems before DBPs form is important to the health and wellbeing of the American people.

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