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water

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fire protection

#37



August 19, 2014

Attention: State Water Resources Control Board

Ref: NPDES Permit for Drinking Water Systems Discharges

The Mariposa Public Utility District (District) provides public water, wastewater and fire protection services to the town of Mariposa. The town of Mariposa is located in the Sierra Foothills on Highway 140 about thirty-five miles west of Yosemite National Park. The District has approximately seven hundred fifty water and sewer service connections. The District employs six full time staff, two of which are administrative positions. The District's full time staff operates two surface water sources, a surface water treatment facility (SWTF), water distribution system, three ground water wells, wastewater collection system and a wastewater treatment facility with direct discharge to surface water.

37.1

The SWRCB may or may not have received comments from the very small water systems on the proposed NPDES permit for drinking water system discharges. I do understand SWRCB staff has held several workshops. The District's experience is that many small utilities have no time or staff to study proposed regulation and attend workshops. Many times small utilities are only able to react after a regulation is implemented. It may be appropriate to allow more time for small utilities to comply due to the financial impacts. The CDPH drinking water program has in the past implemented regulations at different periods depending on population served or number of service connections.

37.2

Relative to the District's operations, staff has already implemented de-chlorination and chlorine residual monitoring methods when discharging large amounts of water such as hydrant testing and distribution system flushing. Additional monitoring for turbidity and pH is relatively simple to add to the tasks in the field. The documentation, notification and reporting requirements will take up additional staff time and represent most of the impacts of the referenced regulation to small water systems. An example of staff time impacts in the District's case is the sanitary sewer system overflow program. This program did not change any of the field operations of the District, yet requires a significant amount of monitoring, reporting and plan development for administrative staff, especially in response to an overflow.

37.1
cont.

I am hopeful that the SWRCB staff that has direct contact with small water systems will use discretion based on the utility size in implementation of the NPDES permit requirements for drinking water systems.

Some specific comments:

- The economy of scale in funding new programs for small agencies is quite a bit different than the impacts to larger water systems. Many small water systems may not be able to perform the monitoring and reporting without additional staff and or funding. With the restrictions already in place on adjusting water rates, the cost to generate additional revenue is expensive and time consuming. If at all possible, it would reduce the impacts on small utilities to provide relief from regulations on rate increases for specific SWRCB programs.
- Page 17, section VII.A, Receiving water limitations includes the limitation for pH in receiving water. I could not find a required location for monitoring pH. At least an upstream and downstream sample should be collected. Is there a minimum or maximum distance from the discharge required for the pH monitoring?
- Page 17, section VII.F, Hydro modification. There may be some discharges to small streams with low or no flow. Is this limitation based on the full flow or wet weather characteristics of the stream or the condition of the stream at the time of discharge? Current stream conditions may prohibit any discharge.
- Page E-4, table E-2 includes monitoring parameters and required test methods. Monitoring flow is listed as "estimate" for sample type yet the test method indicates a metering method with calibration requirements. I would recommend removing "1" as the test method for flow in the table.
- The referenced regulation refers to "event" several times. Is there a definition for "event"? Flushing distribution systems may take several days, is "event" considered one hydrant operation, one day of flushing, or the total time for flushing?

37.3

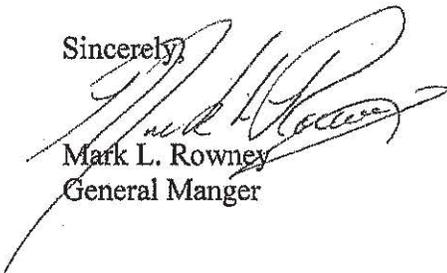
37.4

37.5

37.6

Thank you for this opportunity to comment. Please keep in mind the effects on small communities when adopting regulation.

Sincerely,


Mark L. Rowney
General Manger

MLR:sw