(9/23/14) Board Meeting
Draft Drinking Water Systems General Permit
Deadline: 8/19/14 by 12:00 noon

City of Huntington Beach
2000 Main Street ♦ PO Box 190 ♦ CA 92648

Travis K. Hopkins, PE
Director

Department of Public Works
(714) 536-5431

RECEIVED
8-19-14
SWRCB Clerk

August 19, 2014

State Water Board- via email

Subject: Comment Letter – Draft Drinking Water Systems General Permit and Resolution

To Whom It May Concern:

The City of Huntington Beach Public Works Department (City) has completed the review of the latest draft proposed State National Pollutant Discharge Elimination System (NPDES) Permit for Drinking Water System Discharges to Surface Waters. The City opposes the adoption of the proposed permit for the following reasons:

1. Discharges from the City's Drinking Water System of treated drinking water, or potable water from our wells, is adequately regulated by the City's MS4 permit. Treated water is properly de-chlorinated prior to the release to the storm drain system or to the receiving water body.

2. Discharges from the City's Drinking Water System do not harm the beneficial use of the receiving water bodies.

3. The City's Drinking Water System does not discharge to bodies of water that have Total Maximum Daily Limits (TMDLs) that directly apply Waste Load Allocations (WLAs). The City is in agreement with the "Finding" section of the proposed permit Section III.H, paragraph two which states, *Based on the data that is currently available, and due to the high quality and intermittent and short term nature of these discharges from drinking water systems authorized under this Order, it is unlikely that these discharges contribute to the impairment of the TMDL-related water bodies.* It is also unlikely that discharges from Drinking Water Systems contribute to the impairment of receiving bodies of water that are not regulated with TMDLs or WLAs.

4. The proposed permit is regulating discharges which have far higher water quality than the receiving water bodies.

5. The proposed permit will require staff time and commitment for reporting and compliance. However, there is appears to be no real benefit to the receiving bodies of water or to the environment that will result from the promulgation of this new permit.

If you have any questions, please contact Terri Elliott at (714) 375-8494 or email her at telliott@surfcity-hb.org.

Sincerely,

Duncan S. Lee, PE
Principal Civil Engineer

DSL:cs

Cc: Travis K. Hopkins, Public Works Director
Tom Herbel, City Engineer
Brian Ragland, Utilities Manager
Terri Elliott, Principal Civil Engineer