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August 19, 2014

State Water Resources Control Board
Attn: Jeanine Townsend, Clerk to the Board
1001 I Street, 24th Floor
Sacramento, California 95814

Subject: Comment Letter
Draft Drinking Water Systems General Permit and Resolution
(Revised July 03, 2014)

Dear Board Members:

Thank you for the opportunity for Soquel Creek Water District (SqCWD) to comment on the State Water Resources Control Board's (SWRCB's) draft General Permit for Drinking Water Systems Discharges to Surface Waters. The SqCWD operates a community water system with 17 supply wells and almost 15,000 connections. The system is situated along the coastal plain bordering Monterey Bay, as well as in the adjacent uplands within the Soquel and Aptos Creek watersheds. The area includes many small unnamed intermittent streams and drainages, as well as several larger creeks.

Comments

Section I.B.3

To be eligible for coverage under this Order, discharge of raw water may not cause or contribute to the receiving water exceeding a primary or secondary drinking water MCL, on a running annual average basis.

This statement suggests that a raw water discharge may exceed a primary or secondary MCL as long as it does not cause the receiving water to exceed an MCL. However, if this is the correct interpretation, then compliance would be based on receiving water monitoring and the Order does not require testing of receiving waters.

Section I.C.1.b

The proposed Order does not appear to allow for planned discharges of raw water from sources that require treatment to comply with primary or secondary MCLs. Raw water from fourteen of the 17 SqCWD wells exceeds a primary or secondary MCL. Is it the SRWCB's intent that none of the discharges in Section I.C.1.b will be allowed under the Order, prohibiting normal maintenance activities on 82% of SqCWD's wells that are required

to comply with regulations enforced by the SRWCB Division of Drinking Water?

Has the SWRCB determined the percentage of raw water sources in the State's community water systems that exceed primary or secondary MCLs? Is it the SWRCB's intent that these wells be inactivated since normal maintenance activities on these wells that include discharges will be prohibited under the Order?

Section II.B.1.c.vi

Please define "receiving water" and include in Attachment A, Definitions. Does it include all Waters of the United States, or just any water body listed in the applicable Basin Plan that is assigned beneficial uses?

The process of identifying a 300-foot conveyance distance and/or 300-foot radius distance to a receiving water for all portions of the community water system will be exceedingly difficult for complex systems that are situated in terrain with multiple receiving waters. If a "receiving water" is defined as "Waters of the United States" then the SqCWD has dozens of different receiving waters traversing its distribution system. Please consider acceptance of a map (or multiple maps with focused areas) which show(s) the distribution system in relation to all area water bodies. Then, at the time of the planned or unplanned discharge, allow the water purveyor to identify the extent of the discharge and whether or not it was within 300 feet.

Section III.E

*Requirements of this Order implement the Ocean Plan and are applicable to those discharges entering directly into the Ocean or indirectly via a storm water system that drains into the Ocean **near the location of discharge.***

Please define what is meant by "near the location of discharge." There are many water systems near the coast which have indirect discharges to the ocean through storm drainage systems that EVENTUALLY lead to the ocean. Is there a specific distance that is applicable?

Section III.H

*Alternatively, if further TMDLs are adopted that address pollutants that are likely to be in discharges from drinking water systems, and allocate waste loads specifically to water purveyors regulated under this Order, the State Water Board **will may** consider additional adding TMDL-specific permit requirements to Appendix G of this Order in a subsequent permit amendment or renewal.*

Please correct the language to either will or may, but not "will may."

Section VII.A

Consider pH changes that lower OR RAISE the pH – since there are water systems that utilize caustic soda (sodium hydroxide) to raise the pH of the water entering the distribution system.

Section VIII.C.2.c

This section addresses BMPs for automatic discharges from unchlorinated pump-to-waste wells. However, this type of discharge is not listed in either Section I.C.1.b, Attachment F Section II.D.1.b, or Attachment F Table F-1. This is a very common type of raw water discharge from supply wells, where water is pumped to waste upon pump start up and shut down for water quality and/or distribution system water hammer issues.

Attachment A

- **Include a definition for “representative monitoring sites.”**
- **Include a definition for “Daily Average.” Is it a 24-hr rolling window or an actual date, as in July 30 or 31?**
- **Include definition for “receiving water.”**

Attachment B

If a “receiving water” is any Water of the United States then it will be infeasible to list all of these unnamed tributaries that traverse the District.

There is mention of including in the NOI any water bodies which may be on the 303d list. If we have one of the 303d listed water bodies with an adopted TMDL, does that automatically make the District subject to the TMDL regulations in Attachment F, even if the District is not part of the Los Angeles or San Diego regions?

Attachment E – Section I.B

The requirement for testing being limited to field tests (versus laboratory tests) is appreciated.

The QA/QC protocol must conform to USEPA guidelines, or procedures approved by the American Water Works Association or other professional drinking water industry association.

Please list the exact USEPA guideline or AWWA approved procedure that will be acceptable for this Order.

Attachment E – Section I.E

The acknowledgement of monitoring certain emergency discharges as being infeasible is appreciated.

Attachment E - Section II

A. The Discharger shall monitor the following:

- 1) direct discharges to a receiving water body of the U.S.,
- ~~2) discharges that are located within 300 feet of a water of the U.S. (traveling via a storm drain or other conveyance system),~~
- 2) direct or non-direct discharges that are greater than 325,850 gallons per event.

B. The Discharger shall monitor all other non-direct discharges (traveling via a storm drain or other conveyance system), ~~(those with more than 300 feet from a surface water)~~ based on representative monitoring, as specified below.

Please explain why the “300 feet” rule has undergone a strikethrough in this section of Attachment E, yet the NOI requirements still make mention of providing locations within 300 feet of a water body and the Fact Sheet makes several references to 300 feet.

Attachment E - Section II.A.1 and Table E-1

Required monitoring of discharges to a Water of the United States lacks a minimum volume/duration threshold. Monitoring as outlined in Table E-1 of automated pump-to-waste discharges from well start-ups and shut-downs is infeasible. Additionally, monitoring of discharges from water quality analyzers would be a significant cost driver due to staff time.

Attachment E - Section II.B.1

*The Discharger shall identify representative monitoring locations in its water supply system that represent the quality of the discharge **after BMPs have been implemented** and prior to the discharge entering the receiving water, or other conveyance system.*

During the July 23rd Stakeholder Meeting, SWRCB staff stated representative monitoring can be fulfilled with data from Safe Drinking Water Act (SDWA) monitoring compliance data. SDWA compliance data are either from raw sources (prior to treatment to meet MCLs) or treated water, which is chlorinated. None of this data represent the quality of distribution system discharges after BMP implementation.

Is it intended that water utilities create scenarios similar to discharge events that include BMP implementation, such as dechlorination, at locations across the water system, to collect this representative monitoring data?

Please specifically describe what monitoring data will satisfy “representative monitoring.”

Attachment E - Section II.V

On page E-5, please change the word “Discharge” to “Discharger” in the first sentence of Section V.

Attachment E - Section VII.B.3

The Self-Monitoring Report due date is satisfactory.

Attachment F - Section I.B.3

This Order covers discharges from wells in unpolluted drinking water aquifers.

Please define “unpolluted drinking water aquifers.” There are many drinking water wells completed in aquifers with both naturally occurring and anthropogenic compounds exceeding both primary and secondary MCLs that have wellhead treatment. Are these considered “polluted” aquifers that are not covered by the Order?

Attachment F - Section II.B

Consider adding calcium thiosulfate to this list of common dechlorinating agents.

Attachment F - Section II.C.5

Please correct the highlighted word “unexpectedly” to “unexpected.”

Sincerely,

SOQUEL CREEK WATER DISTRICT

A handwritten signature in black ink, appearing to read "Kim Adamson". The signature is fluid and cursive, with the first name "Kim" being more prominent.

Kim Adamson
General Manager