



August 5, 2014

**State Water Resources Control Board
Public Hearing**

Draft Statewide Permit Package for Drinking Water System Discharges To Surface Waters

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Staff Presentation

- **Overview of permit package**
- **Continued State Board permit development and adoption process**
- **Proposed statewide implementation process**

Why is State Board Taking This Effort?

- **One statewide permit instead of nine permits**
- **Efficient use of staff resources**
 - Five regional board permits expire in 2014
- **Consistent regulation across regional boundaries**
- **Cost of compliance evaluation**

Basic Water Quality Concerns from Drinking Water System Discharges

- **Toxicity – chlorine, metals and ambient pH**



- **Solids - sediment, turbidity, sand and trash**



Basic Water Quality Concerns from Drinking Water System Discharges

- **Erosion, scour and hydro-modification**



Draft Permit Package

- 1. Draft Resolution to Grant Exception to Water Purveyors Statewide**
 - Includes Draft Mitigated Negative Declaration for compliance with CA Environmental Quality Act (CEQA)
- 2. Draft Statewide NPDES General Permit to regulate discharges from drinking water systems**

Draft Resolution Granting Exception to Water Purveyors Statewide

- **Applies to discharges resulting from mandated activities required by Safe Drinking Water Act and California Health and Safety Code**
- **Excepts water purveyors from California Toxics Rule (CTR) requirements in the State Implementation Policy and Ocean Plan**
- **Applies to priority pollutant criteria more stringent than current Maximum Contaminant Levels (MCLs)**

Examples:

- **Copper: MCL 1000 ug/L, CTR 3.1 - 13 ug/L**
- **Zinc: MCL 5000 ug/L, CTR 81 – 120 ug/L**
- **Dichlorobromomethane: MCL 80 mg/L, CTR 0.56 ug/L**
- **Dibromochloromethane: MCL 80 mg/L, CTR 0.41 ug/L**

Draft Statewide Permit Types of Discharges

- **Applies to planned discharges that qualify for the Exception and emergency discharges**
 - **Applies to raw, potable and treated water that is discharged from a drinking water system to a water of the U.S.**
 - **Applies only to water from a system that is dedicated for drinking water**

Draft Statewide Permit Types of Discharges

- Planned discharges that allow management practices to be put in place
 - Direct to surface waters
 - Routed to storm drain systems
- Emergency discharges



Proposed Enrollment Draft Statewide Permit

Who would be required to enroll?

- **Systems with 15 connections or more**

(Transmission systems also included)

(Dischargers with multiple systems apply for one permit)

Who would not have to enroll?

- **Water purveyors that are also municipal storm water permittees**
- **Water purveyors that have an established local agreement with MS4 permittee**
- **Water purveyors whose discharges do not enter waters of the U.S.**
- **Water purveyors whose system-specific or water body-specific discharges require an individual Regional Board NPDES permit due to a TMDL**

Best Management Practice-focused Permit



Existing Management Practices

(distribution system flushing)



Existing Management Practices

(ground water supply wells)



Targeted Effluent Limitations

- **Chlorine limits** (for water treated with chlorine)
 - Super-chlorinated discharges
 - Direct discharges or close-proximity discharges of chlorinated drinking water
- **Turbidity Limits**
 - Ground water supply well “pump-to-waste”

Promoting Multiple Uses of Good Quality Water Prior to Discharge



- Ground water recharge



- Discharge to low impact development or reuse



- Incentive

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

Proposed Monitoring and Reporting

- Field monitoring only (no lab analysis)
- Event monitoring
- Once per year representative monitoring
- Receiving water monitoring
 - For direct and non-compliant discharges
 - Visual receiving water monitoring
- No monitoring for emergency discharges or non-surface water discharges
- Annual reporting to State Board (statewide database)
- Non-compliance reporting when potential adverse impact to beneficial uses
- Pre-notification of large size discharges
- Post notification of emergency discharges

Individual Cost of Compliance

- Cost of compliance varies
 - water purveyor's size, geographical location, staffing levels, and current BMPs

Average field monitoring equipment pricing for the life of the permit

Monitored Parameter	Device	Approximate Price
Chlorine, Total Residual	Pocket Chlorimeter	\$ 300
pH	Portable pH meter	\$ 800
Turbidity	Portable Turbidity meter kit (standards included)	\$ 950
	Total:	\$ 2,050
	Permit Duration:	<u>5 years</u>
	Per year	\$410 per year

Draft Fee Schedule

Discharges From Drinking Water Systems

- Separate process
- Proposed draft fee schedule release - August
- Proposing tiered fee schedule
 - Sensitive to Cost for Small Communities
 - Sensitive to Other Costs
 - Drinking Water Permit Fees
 - Water Rights Fees
 - Other
- \$2062/year – current fee for discharges that require no treatment
- Water purveyors may participate in public process for fee schedule

TMDL Implementation

- Section K of Fact Sheet summarizes existing TMDLs that apply to water purveyors
- Los Angeles and San Diego Regional Water Board TMDLs directly and indirectly reference waste load allocations to water purveyors exclusively
- Staff evaluation concludes that water purveyors are not a source of the pollutant impairment
 - Discharges are unlikely to contribute to impairment
 - Establishing numeric effluent limits, monitoring and treatment to these discharges will not improve impairment

Proposed Transition to One Statewide Permit

December 1, 2014

- Due date for all permit applications (Notice of Intent) or Notice-of-Non Applicability to be submitted
 - Requiring Notice submittal from all water systems allows identification of unpermitted systems
- Deputy Director Approval Notice to include termination of any existing permits

One year after Permit Adoption Date

- All enrollment under regional permits for these type discharges terminate

Permit Package Adoption Process

- ✓ Development of Draft Resolution and Draft Permit
- ✓ August 5, 2014 Hearing
- ❑ Public Comment Period ends August 19, 2014
- ❑ Issue Revised Draft Resolution and Permit, and Response to Comments
 - ❑ 10 days prior to adoption meeting
- ❑ State Water Board Consideration of Adoption – September 23, 2014

Questions?

For Further Information

Contact

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