

State of California
Regional Water Quality Control Board
San Diego Region

REVISED
EXECUTIVE OFFICER SUMMARY REPORT
August 12, 2009

ITEM: 10

SUBJECT: NPDES Permit Reissuance: General Waste Discharge Requirements for the Discharges of Hydrostatic Test Water and Potable Water to Surface Waters and Storm Drains or Other Conveyance Systems within the San Diego Region (Tentative Order No. R9-2009-0094, NPDES Permit No. CAG679001) (Michelle Mata)

PURPOSE: To adopt Waste Discharge Requirements and NPDES Permit for the discharge of hydrostatic test water and potable water to surface waters within the San Diego Region.

PUBLIC NOTICE: A public notice of the tentative order was published in the San Diego Union Tribune on June 28, 2009. Copies of the tentative order were mailed on June 25, 2009 to all enrollees and all known interested parties and agencies. Copies were made available for public review at the Regional Board office on ~~August~~ **June** 25, 2009. The tentative order was also posted on the Regional Board's web site on ~~August~~ **June** 25, 2009.

DISCUSSION: On August 14, 2002, the Regional Board adopted Order No. R9-2002-0020, NPDES No. CAG679001, General Waste Discharge Requirements for Discharges of Hydrostatic Test Water and Potable Water to Surface Waters and Storm Drains or Other Conveyance Systems. Tentative Order No. R9-2009-0094 would, if adopted, supersede and replace Order No. R9-2002-0020. Regional Board staff met with representatives of potable water distribution agencies on July 20, 2009 and July 23, 2009 to discuss the tentative requirements and address any concerns the agencies may have with requirements contained in the tentative Order.

Water distributors (also called purveyors), water districts, municipalities, and private entities need to conduct periodic repair and maintenance work on their distribution system, which in most cases results in discharges of potable water to various receiving waters within the San Diego Region. Repair and maintenance

work may include water line draining for addition of new service connections, draining for internal inspections, draining for valve replacements, or water line flushing for water quality reasons to address public health issues. Hydrostatic testing of pipelines, tanks and vessels dedicated to drinking water as well as newly constructed (un-used) non-drinking water pipelines, tanks and vessels is also conducted.

Certain constituents potentially contained in potable water and/or hydrostatic test water discharges threaten to cause or contribute to excursions above narrative and numeric water quality objectives contained in state and federal regulations. These types of discharges could therefore pose a chronic or acute toxicity risk to freshwater and saltwater aquatic animal and plant life. For example, hydrostatic testing of pipelines, tanks, etc., often results in the production of super-chlorinated water that is needed for the initial disinfection. Super-chlorinated water can have a chlorine concentration of more than 25 milligrams per liter (mg/L). In drinking water, the Maximum Disinfecting Residual Level (MDRL) is set by the Department of Health Services at 4 mg/L. Typically, the chlorine concentration in drinking water ranges from 0.5 to 2.5 mg/L. However, the acute sensitivity of freshwater species, when exposed to total residual chlorine, ranges from 0.028 mg/L to 0.7 mg/L (*Quality Criteria for Water, 1986*). Other constituents of concern include total dissolved solids and total suspended solids.

Order No. R9-2002-0020 requires enrollees to establish a set of Best Management Practices (BMPs) to address discharges associated with hydrostatic test water and potable water. BMPs include source control BMPs to minimize contact between pollutants and flow (e.g. rerouting of flow to prevent the discharge, erosion, which can lead to sedimentation in discharge) as well as treatment control BMPs to remove pollutants present in the discharge water before it enters receiving waters, including storm drains and other conveyance systems. The tentative Order requires compliance with minimum BMPs as previously established in Order No. R9-2002-0020.

Prolonged and continuing drought conditions have made water conservation a crucial consideration with respect to water supply. The discharge of millions of gallons of water by potable water distribution agencies has been a concern of the public and of this

Regional Board. The agencies have expressed that conservation of water is a high priority and thus only discharge water when needed to maintain the system or for protection of public health.

Effluent and receiving water limitations from Order No. R9-2002-0020 have remained essentially unchanged.

To date, the Regional Board has received initial written comments from the Technical Advisory Committee (TAC). The TAC is comprised of staff from the San Diego County Water Authority and its 24-member agencies. **Additional comments have been received from the Metropolitan Water District of Southern California and the City of Del Mar.** A response to comments document and errata will be prepared and provided in the supplemental agenda packet.

SIGNIFICANT
CHANGES:

The following areas in Tentative Order No. R9-2009-0094 differ from the current Order No. R9-2002-0020:

- 1) The pH has been revised to be consistent with the Basin Plan Objectives (as outlined in Chapter 3) for Bays and Estuaries and Inland Surface Waters; and
- 2) Dischargers shall submit an annual report which outlines water distributed throughout the year, total volume of planned dischargers throughout the year, and total volume of unplanned discharges throughout the year.

3) Discharges under 500,000 gallons/day are exempt from the MRP of Order No. R9-2002-0020. This number has been reduced to 1 acre-ft/day (325,850 gallons/day) in the tentative Order.

COMPLIANCE: Not Applicable

LEGAL ISSUES: None

- SUPPORTING DOCS:
1. Transmittal Letter for Tentative Order No. R9-2009-0094
 2. Tentative Order No. R9-2009-0094
 - 3. Comment Letter from San Diego County Water Authority on behalf of the TAC (July 17, 2009)**
 - 4. Comment Letter from the Metropolitan Water District of Southern California (July 27, 2009)**

5. Additional Comments submitted by the TAC on July 31, 2009 (redline/strikeout of tentative Order)
6. Comment Letter from the City of Del Mar (August 4, 2009)
7. Transmittal Letter for Response to Comments Document and Errata
8. Response to Comments Document
9. Errata

RECOMMENDATION: Adoption of Tentative Order No. R9-2009-0094 with Errata is recommended.