



City of Anaheim
PUBLIC UTILITIES DEPARTMENT
Environmental Services



July 31, 2014

State Water Resources Control Board
1001 I Street, 15th Floor
Sacramento, CA 95814

Subject: Comments on Draft General Permit for Utility Vault and Underground Structure Discharges to Waters of the United States

Thank you for the opportunity to comment on the Draft General Permit for Utility Vault and Underground Structure Discharges to Waters of the United States that was issued June 26, 2014. Anaheim Public Utilities owns and operates electric and water utilities within the City of Anaheim and has been in compliance with the current General Permit for vault discharges. We concur that protecting water resources is important, but the costs necessary to conduct Study 1 do not appear justified in all cases. Anaheim Public Utilities requests that the following changes be made to the General Permit:

1. The requirement to conduct Study 1 should only apply if the receiving waters of a Utilities' service territory are impaired with the contaminants of concern. If the receiving waters are not impaired or threatened to be impaired, then Study 1 should not be required. If an impairment does exist, then Study 1 should only need to analyze for the contaminants of concern, not the entire list of Priority Pollutions in Table G-3 (referenced as Table G-1 in the text). Utilities have been discharging water from vaults under the current permit for many years and if the receiving waters are not impaired, then it is logical to conclude that the discharges are not causing an impairment. The proposed revision will maintain protection of water resources while avoiding unnecessary expenses.
2. The Numeric Action Level of 5 ug/l listed in Table 3 for TPH is below the detection limit for most analytical methods. The explanation within the text states that 5 ug/l was selected because it is the taste and odor threshold in drinking water. The laboratory detection limits for vault water will be much higher than those in drinking water due to the differences in purity and related background interference. In addition, a drinking water standard should not be applied to vault water discharges. We recommend that the numeric action level be raised to at least 500 ug/l.

If you have any questions, please feel free to contact me via phone (714-765-4277) or email (dwilson@anaheim.net).

Sincerely,

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