



CALIFORNIA WATER SERVICE

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August 18, 2017

Jeanine Townsend
Clerk of the Board State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Comment on the Proposed Amendment to the General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4)- Order 2013-0001-DWQ

Dear Ms. Townsend,

California Water Service (Cal Water) appreciates the opportunity to comment on the proposed amendment to the Small MS4 General Permit. We would like to comment on the inclusion of the TMDL in the Lower Salinas River and Reclamation Canal Basin and the Moro Cojo Slough Subwatershed for Nitrogen Compounds and Orthophosphate in the June 2017 draft amendment to the Small MS4 General Permit (pages 83-85 in the draft).

Cal Water is a Provider of Essential Public Services that serves drinking water to residential and commercial customers in twenty-one districts throughout the state. The source of the drinking water in the Salinas Valley comes primarily from groundwater. In order to comply with the Safe Drinking Water Act, raw groundwater from the well source is occasionally discharge outside of the distribution system. The preferable method is to direct this water to land for beneficial reuse or to sanitary sewer. However, when these options are not available, the only option remaining is discharging to surface waters, either directly or indirectly through a Municipal Separate Storm Sewer System (MS4). Cal Water is enrolled in and manages these discharges under the Statewide NPDES Permit for Drinking Water System Discharges.

Cal Water's Salinas District provides water to the City of Salinas as well as five smaller communities in unincorporated areas of Monterey County. As shown in Table 1 below, twenty-nine of Cal Water's wells in these areas contain levels of nitrate that exceed the Dry Season Wasteload Allocation (WLA) due to the impact of large-scale agricultural activity in the Salinas Valley.





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Table 1- California Water Service Wells with Nitrate as Nitrogen Levels over the Dry and Wet Season Wasteload Allocations (See page 84 in the draft amendment to Order 2013-0001-DWQ for these Wasteload Allocations)

Waterbody	Dry Season WLA for NO3 as N	Number of Cal Water Wells with 10 Year Avg. NO3 as N over the Dry Season WLA	Wet Season WLA for NO3 as N	Number of Cal Water Wells with 10 Year Avg. NO3 as N over the Wet Season WLA
Allocation 1 – Lower Salinas River downstream of Spreckels	1.4 mg/L	10	8.0 mg/L	1
Allocation 3 – Santa Rita Creek, Reclamation Canal	6.4 mg/L	15	8.0 mg/L	4
Allocation 6 – Gabilan Creek, Alisal Creek	2.0 mg/L	4	8.0 mg/L	1

In order to meet the SWRCB Division of Drinking Water's MCL of 10 mg/L Nitrate as Nitrogen or to collect raw water samples for analyses, Cal Water must periodically "blow off" (pump to a location outside the drinking water distribution system) these wells. It is often necessary to discharge volumes of up to 20,000 gallons in a single event.

Our understanding is that the WLAs are applicable at the specified receiving water. Our concern is that MS4 operators enrolled in the Small MS4 General Permit may prohibit the introduction of water into the MS4 that is above a WLA. If this stance is taken by MS4 operators, it would effectively shut the well down and have a significant impact on Cal Water's ability to uphold its responsibility as a Provider of Essential Public Services.

Cal Water has considered the technical and economic feasibility of treating the water prior to distribution to customers. Ion exchange is the conventional treatment technology for removing nitrate from drinking water. Based on the costs for an ion exchange system installed at a well in Cal Water's Salinas District in 2012, site improvements to accommodate an ion exchange treatment system cost roughly \$300,000 and the average annual operation and maintenance costs are \$257,000. For the twenty-nine wells listed in Table 1 with ten-year average nitrate levels over the Dry Season WLA, the total estimated costs would be \$8,700,000 for site improvements and \$7,453,000 per year for operation and maintenance.



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While treating nitrate is technically feasible, it is not economically feasible considering that a treatment system would have to be installed and maintained for a periodic discharge from every nitrate impacted well that may only happen once every couple of years. Considering the overall mass of nitrate that would be reduced by well-head treatment, the environmental benefit would by and large be insignificant.

Capital projects involving the design, preparation and installation of ion exchange treatment systems would have to go through a lengthy review process by the California Public Utilities Commission. More times than not, the PUC rejects a proposed project when it feels the burden on the ratepayers is too great.

Due to this burden, Cal Water requests an exclusion for water purveyors from TMDL requirements for discharges flowing to Small MS4s in the lower Salinas Valley. We respectfully submit that the SWRCB and Central Coast RWQCB should instead continue to pursue actions to improve groundwater quality in the area through the new Agricultural Order and related outreach to the agricultural industry.

Sincerely,

A handwritten signature in blue ink that reads "Dale Gonzales".

Dale Gonzales, P.E.
Environmental Director
(408) 367-8324