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Via Email
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Gerard J. Thibeault, Executive Officer
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3348

SUBJECT: Written Comments on the proposed updated Waste Discharge Requirements for the County of Orange, Orange County Resources and Development Management Department and The Incorporated Cities of Orange County Within the Santa Ana Region Areawide Urban Storm Water Runoff, ORDER No. R8-2008-0030, NPDES No. CAS618030 Orange County

Dear Mr. Thibeault;

We appreciate the opportunity to comment on the proposed updated Waste Discharge Requirements For the County of Orange, Orange County Resources and Development Management Department and The Incorporated Cities of Orange County Within the Santa Ana Region Areawide Urban Storm Water Runoff, ORDER No. R8-2008-0030, NPDES No. CAS618030 Orange County.

Southern California Gas Company (SCG), a California regulated public utility, genuinely supports the Santa Ana Regional Water Quality Control Board and Staff (RWQCB) concerning the proposed revision to this important permit for water quality improvement. However, we have one issue of vital importance to SCG regarding the wording of an important section of the permit.

In permit Section III. 3. ii. a), the proposed revision to the Orange County MS4 Permit may appear to the municipalities as a mandate to **prohibit all** certain potable water discharges that are used for various purposes including hydrostatic test water for new piping, unless the water meets the stated RWQCB criteria. SCG requests that the wording in Section III. 3. ii, prior to subsection a), incorporate the exception for NPDES permits stated in Section III. 3. We suggest changing the wording in the heading for Section III. 3. ii to read: "The permittees shall prohibit the following categories of non-storm water discharges unless such discharges are authorized by a separate NPDES permit and/or the stated conditions below are met."

SCG considers the RWQCB NPDES De Minimus Permit an important tool to assist SCG in providing a cost effective, timely, safe, and reliable supply of natural gas to its customers, as SCG is legally required to do by the U.S. Department of Transportation ("DOT") and the California Public Utilities Commission ("CPUC"), while providing this service in an environmentally conscientious manner.

SCG has natural gas transmission and/or distribution pipelines and piping in every municipality within the Santa Ana Regional Water Quality Control Board (SWRCB) region. SCG routinely installs new pipelines and piping, or new sections of pipelines and piping to service new customers, or to maintain existing pipelines and piping. It is a requirement of both DOT and the CPUC that certain new pipelines and piping be pressure tested for safety. The only practical

means for this testing is to fill the pipelines with potable or other clean source of water, and then add air or nitrogen to raise the pressure to the required pressure testing standards. Adding air or nitrogen alone to the required pressure would be prohibitive on a cost and time basis, and disposal of the clean hydro-test water by other means is often cost prohibitive due to the volume of water required. SCG's hydrostatic test water discharges on new pipe have consistently met all current RWQCB De Minimus Permit parameter limits.

SCG also considers it vitally important that their pipeline and piping and other business activities that cross municipal and other local jurisdictional boundaries, be regulated as consistently as possible, minimizing the potentially numerous different, and potentially conflicting, construction requirements as a project proceeds from one local jurisdiction to the next.

For the purposes of removing a potential source of confusion and the provision of as much regulatory consistency as possible across the SCG service territory, SCG respectfully requests the insertion of the above clarifying wording in the aforementioned text.

Thank you for your consideration.

Sincerely,

/G. Scott Koken/

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