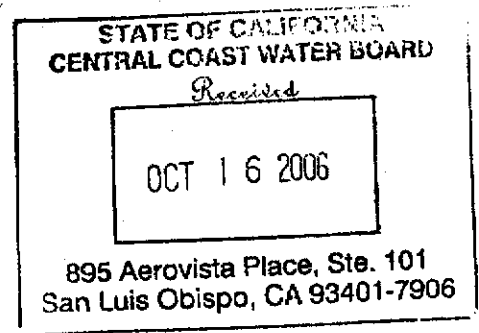




October 13, 2006



California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

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Executive Director

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Santa Ynez River Water
Conservation District,
Improvement District #1

Associate Member

La Cumbre Mutual
Water Company

Re: Comments on Draft Waste Discharge Requirements General Permit for
Discharges with Low threat to Water Quality, WDR Order No. R3-2006-0063

Dear Sir/Madam:

The Central Coast Water Authority (CCWA) provides imported State Water Project water to 27 retail water agencies in San Luis Obispo and Santa Barbara Counties. Maximum daily deliveries can reach nearly 50 million gallons per day and annual deliveries typically reach 40 to 45 thousand acre-feet.

Since CCWA utilizes the NPDES general permit for its operations, it offers the following comments to the changes proposed by the RWQCB staff:

- ① • Section A. Application Requirements 1.b.1. Requires the discharger to submit a list of chemicals (including Material Safety Data Sheets) added to the water and the concentration of such additives in the discharged effluent. For potable water, treated by a water agency treatment plant, are staff requiring all treatment chemical (coagulants, filtration aids, disinfectants, etc.) data to be provided? Is a distinction made for chemicals that are removed from the potable water (coagulants) before it leaves the treatment plant? Additional clarification for the benefit of all dischargers would be helpful.
- ② • Section A. Application Requirements 1.b.6. Requires certified analytical results of all test samples. Staff should decide if it really wants all samples (such as temperature) to be taken to a certified lab for analysis. Many analyses can only be taken in the field. Perhaps staff should consider the type of analytical equipment that should be required and a level of proficiency necessary for field analysis. In addition, this section requires analysis of the receiving water both upstream and downstream of the discharge point. It does not state when this analysis must be done. Can it be done a day, week, month, etc. before the discharge? Can it be done after the discharge?
- ③ • Section A. Application Requirements 7. States that a discharge may not occur until after the applicant receives written confirmation of enrollment. Staff must commit to providing confirmation within a certain number of days so planning and scheduling of discharges can occur with a certain degree of certainty.

255 Industrial Way
Buellton, CA 93427-9565
(805) 688-2292
FAX: (805) 686-4700

Item No. 13 Attachment No. 10
Dec. 1, 2006 Meeting
Low Threat Permit



- ④ • Section D. Receiving Water Limitations 1. Potable water discharges cannot always meet the pH or temperature criteria. Treatment plants use pH as a corrosion inhibitor in pipeline systems. pH as high as 8.7 are common during certain periods of the year. Draining a four-mile section of 42" pipeline may very well cause a temporary pH increase of .5 units or more. Temperature of State Project water in the summer can reach 25 degrees centigrade. Perhaps it would be better to control its discharges not to exceed a maximum temperature, than to adhere to an arbitrary temperature increase factor.
- ⑤ • Section D. Receiving Water Limitations 3. Rather than stating that dissolved oxygen concentrations must not be depressed below 7.0 mg/l, staff should state that concentrations should not be degraded by more than 3 mg/l.
- ⑥ • Section D Receiving Water Limitations 12. This paragraph is too broad to be meaningful. Staff need to clarify its intent.

Thank you for the opportunity to comment.

Sincerely,



William J. Brennan
Executive Director

WJB