



San Diego County Water Authority

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SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD

2012 SEP 14 P 1:33

September 13, 2012

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- Yuima Municipal Water District

Ms. Lori Walsh
San Diego Regional Water Quality Control Board
9174 Sky Park Court
San Diego, CA 92123

RE: Comments on Revised Administrative Draft of Regional MS4 permit

Dear Ms. Walsh:

Thank you for the opportunity to provide comments on the San Diego Water Board's revised administrative draft of the Regional Municipal Separate Storm Sewer System (MS4) permit, Tentative Order No. R9-2012-0011. The San Diego County Water Authority is a regional wholesale water agency within San Diego County, with twenty-four member retail agencies. The Water Authority's mission is to provide a safe and reliable water supply to our member agencies. While our primary mission is the delivery of potable water supplies, recycled water is also an important component of our region's current and projected water supply resources mix. Therefore, the potential impact of the storm water permit requirements on both potable and recycled water supplies is of interest to us. We appreciate your efforts to recognize existing NPDES permits and minimize duplication of effort by regulatory agencies.

We do have the following comments on the permit provisions in E. 2. a.(2), page 55 :

1. The language on illicit discharges of non-storm water from line breaks and water main breaks lacks clarity. Therefore, we are recommending revised wording that will make it clear that any discharge under the NPDES Permit No. CAG 679001 (Order No. R9-2010-003) is exempt from regulation under the storm water permit.
2. We recommend that recycled water or potable water discharges not covered under a separate NPDES permit are illicit discharges only if the Copermitttee or the San Diego Water Board identifies the discharge as a source of pollutants to receiving waters. This will avoid the need for regulatory action in response to a recycled water main break or leak which may have no real impact to receiving waters.

OTHER REPRESENTATIVE

County of San Diego

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Our proposed modifications are shown in the attachment to this letter. Thank you for the opportunity to comment. If you have any questions regarding this letter, please contact Lesley Dobalian at (858) 522-6747.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Weinberg", written over a white background.

Ken Weinberg
Director of Water Resources

Attachment

Attachment

Suggested revisions to Tentative Order No. R9-2012-0011

Section II. E. Jurisdictional Runoff Management Programs

2. Illicit Discharge Detection and Elimination

a. Non-Storm Water Discharges

Each Copermittee must address all non-storm water discharges as illicit discharges, unless ~~a non-storm water discharge~~ is either identified as a discharge authorized by a separate NPDES permit, illicit, or identified as a category of non-storm water discharges or flows are identified that must be addressed pursuant to the following requirements:

(1) Discharges of non-storm water to the MS4 from the following categories must be addressed as illicit discharges unless the discharge has coverage under NPDES Permit No. CAG919001 (Order No. R9-2007-0034, or subsequent order) for discharges to San Diego Bay, or NPDES Permit No. CAG919002 (Order No. R9-2008-0002, or subsequent order) for discharges to surface waters other than San Diego Bay:

- (a) Uncontaminated pumped ground water;
- (b) Discharges from foundation drains; 3
- (c) Water from crawl space pumps; and
- (d) Water from footing drains.

~~(2) Discharges of non-storm water from water line flushing and water main breaks to the MS4 must be addressed as illicit discharges unless the discharge has coverage under NPDES Permit No. CAG 679001 (Order No. R9 2010 0003, or subsequent order). This includes water line flushing and water main break discharges from water purveyors issued a water supply permit by the California Department of Public Health or federal military installations. Discharges from recycled or reclaimed water lines to the MS4 must be addressed as illicit discharges, unless the discharges have coverage under a separate NPDES permit.~~

(3) Discharges of non-storm water to the MS4 from the following categories must be addressed by the Copermittee as illicit discharges only if the Copermittee or the San Diego Water Board identifies the discharge as a source of pollutants to receiving waters:

- (a) Diverted stream flows;
- (b) Rising ground waters;
- (c) Uncontaminated ground water infiltration to MS4s;

(d) Springs;

(e) Flows from riparian habitats and wetlands;

(f) Discharges from potable water sources

(g) Discharges from water line flushing and water main breaks to the MS4, that are not covered under NPDES Permit No. CAG 679001 (Order No. R9-2010-0003, or subsequent order).

(h) Discharges from recycled or reclaimed water lines to the MS4 that are not covered under a separate NPDES permit.