



June 23, 2014

Susan Glendening  
California Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

[Sent via email to [SGlendening@waterboards.ca.gov](mailto:SGlendening@waterboards.ca.gov) ]

Subject: ***Comments on the Tentative General Waste Discharge Requirements for Discharges of Water from Drinking Water Supply Distribution, Transmission and Groundwater Systems***

Dear Ms. Glendening:

Zone 7 Water Agency is a public agency responsible for providing wholesale drinking water to over 220,000 people in the cities of Livermore, Pleasanton, Dublin and a portion of Dougherty Valley in the City of San Ramon. Zone 7 also supplies untreated water to agricultural customers, manages the local groundwater basin and provides both watershed stewardship and flood protection services. Zone 7 has supported the development of the subject permit covering drinking water system discharges through the San Francisco Regional Water Agencies Partners task force led by East Bay Municipal Utility District. The task force has provided both technical input and financial support to Regional Board staff over the last two years of this permitting effort. In addition to fully supporting the comments submitted by the task force, Zone 7 has an additional comment as follows:

**The frequency of monitoring non-chlorinated, routine drinking water supply well discharges should be reduced from each occurrence to once per year.** The requirement to sample each occurrence of discharge of non-chlorinated groundwater from a well, when  $\geq 15,000$  gallons and within 300 feet of a receiving water body, is excessive due to the consistent nature of the discharges and their being categorized as *de minimis* under the California Code of Regulations. Typically Zone 7 wells are operated to supplement surface water supplies to meet customer demands. Wells are started remotely and on-off operation can occur frequently. The routine discharges from groundwater wells in drinking water aquifers are “discharged to waste” at well start-up. This discharge purges potentially stagnant water prior to delivering the pumped well water to the drinking water distribution system. The turbidity of well discharges is fairly consistent as demonstrated by the fact that the wells are automated to discharge to waste for a set amount of time (5-10 minutes in most cases), as opposed to a set turbidity measurement. These discharges from groundwater wells have already been defined by the State Water Resources Control Board (SWRCB) as “*de minimis*” and “not likely to cause

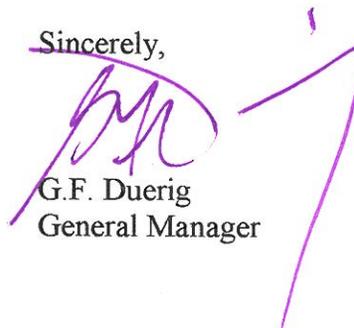
or have a reasonable potential to cause or contribute to an adverse impact on the beneficial uses of receiving waters.” (See California Code of Regulations Title 23 Division 3 Chapter 9 Article 1 Section 2200 Subdivision (b) (9) Category 3 footnote 18.) In addition to the quality of the discharged water, each of Zone 7’s well discharge structures is equipped with a diffuser to prevent erosion and associated suspension of additional particulates at the discharge location. The draft Statewide NPDES Permit for Drinking Water System Discharges to Surface Waters, issued June 6, 2014, requires monitoring of these discharges once per year. The frequency of monitoring in the Region 2 permit should be changed to once per year.

Further, reductions in notification, monitoring, and reporting requirements are consistent with the intent of State Water Board Resolution No. 2013-0029 *Directing Actions in Response to Efforts by Stakeholders on Reducing Costs of Compliance While Maintaining Water Quality Protection* (adopted September 24, 2013). That Resolution included Recital 12 that summarized a recommendation by the NPDES stakeholder group that would “reduce costs of compliance while allowing agencies to focus resources in areas that would have the most direct benefit toward improving water quality.” In particular, Recital 12(c) proposed that:

*“When renewing or revising NPDES permits, consider removing overlapping monitoring requirements, reducing monitoring frequency for parameters consistently in compliance, encouraging surrogate monitoring, and eliminating unnecessary reports.”*

Zone 7 appreciates the opportunity to provide comments on the tentative order. Zone 7 fully supports the adoption of a permit that protects beneficial uses of surface waters through practical means appropriate to the low threat nature of drinking water system discharges. Again, we request that the frequency of monitoring of *de minimis* discharges from drinking water production wells be reduced to once per year in recognition of the consistency of the discharges and cost to comply. If you have any questions, please feel free to contact either me at the number above (email [jduerig@zone7water.com](mailto:jduerig@zone7water.com)) or Rhett Alzona at 925-454-5032 (email [ralzona@zone7water.com](mailto:ralzona@zone7water.com)).

Sincerely,



G.F. Duerig  
General Manager

cc: Kurt Arends, Jarnail Chahal, Rhett Alzona, Emily Moshier