



**Pacific Gas and
Electric Company®**

July Board Mtg Item _____
Utility Vault Permit
Deadline: June 9, 2006

Environmental Services

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June 7, 2006

Ms. Song Her
Clerk to the Board
Executive Office
California State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100.

Re: Comments to the proposed California State Water Resources Board Order number 2006-XXXX-DWQ, Vault Dewatering

Dear Ms. Her,

We have reviewed the proposed California State Water Resources Board Order number 2006-XXXX-DWQ, and we appreciate the opportunity to comment on the document. Our comments can be summarized as follows:

- The Pollution Prevention Plan (Plan) format should be standardized to simplify the review and approval process.
- The Plan should be approved at the State Board level rather than at the Regional Water Board level
- The terms "site" and "facility" should be replaced with the term "monitoring location" for consistency, and to avoid ambiguity and confusion in the Order.
- Historical data should not be included in the Plan as it adds minimal value to the plan and it could create confusion
- Inspections and evaluations of vaults and underground structures should follow existing industry standards and allow use of equivalent California agency requirements.

Pollution Prevention Plan

The existing permit, under Order number 2001-0011-DWQ, required the development and implementation of a straightforward Pollution Prevention Plan

(Plan). The draft of the proposed permit (Order number 2006-XXXX-DWQ) requires the Plan to include extraneous information such as inventory of exposed materials, historical spills and leaks, historical sampling data, and a summary of potential pollution sources. Inclusion of this information in the Plan is unnecessary because it adds little or no value and complicates the Plan. We suggest that the Plan should follow a standard structured format would include contacts and best management practices, only information that would add to the value of the Plan. A standardize Plan that only includes essential information would simplify the review and approval process. We would be willing to provide assistance on developing a standard formatted Plan.

We would also encourage you to allow the Plan to be approved at the State level rather than the Regional Board level. Currently we have vaults in four regions which means we need to submit four plans and receive approval from the four Regional Boards.

We would also request that utilities be granted a grace period to continue managing their discharge requirements under Order number 2001-0011-DWQ while the permit application for the newly proposed order is being evaluated.

Monitoring Locations

The terms "site" and "facility" appear to be used interchangeably throughout the newly proposed order as if utility companies have a dedicated site or facility subject to this order. In fact, utilities have thousands of vaults and several different types. We would propose referring to these designated vaults as "monitoring locations." This change would help avoid confusion and ambiguity when describing the monitoring and reporting requirements in the Plan.

As noted in the proposed order, water runoffs due to precipitation do collect in the vaults, and they have to be emptied to safeguard equipment or personnel working in the vault. Water pumped out of vaults could eventually end up in the storm drains, and therefore it would be subject to the provisions of this order. It is, however, not practical to individually sample each enclosure to satisfy the requirements of this order. The reasons are: there are too many vaults, and precipitation events are unpredictable. Rather, we would propose an annual representative sampling of each type of vault "monitoring location" in each of the Regional Water Board areas in accordance with current practice.

Historical Data Requirement

Special Provisions Section .C.3.e. (iii).(b) on page 10 of the proposed order would require an "Inventory of Exposed Materials" in the Plan. The inventory includes a description of significant materials managed to allow exposure to storm water from 3 years prior to the Notice of Intent (NOI) and materials

management practices employed to minimize contact of materials with storm water runoff from the past 3 years prior to the Notice of Intent (NOI). This historical requirement is unnecessary and provides no value to the plan. Vaults are not used for handling, treatment, storage, disposal of materials because are generally considered confined space.

It is more important to include the best management practices (BMP) that address materials management practices that minimize contact of materials and equipment in vaults with storm water runoff. Including historical information in the Plan adds no value and could increase confusion since BMPs are improved over time.

Special Provisions Section C (3) (e) (iii) (c), page 10 of the proposed order requires that a list of significant spill and leaks of toxic or hazardous pollutants that occurred at areas exposed to precipitation or that otherwise enter the discharge stream from 3 years prior to the date of the submission of the NOI. This requirement of including historical data in the Plan provides little practical value. Especially since after each incident the Plan is reviewed, revised and resubmitted to the applicable Regional Water Quality Control Board as required in Special Provisions Section C (3) (f), page 12 of the proposed order.

Inspections and Comprehensive Site Compliance Evaluation

Special Provisions Section C (3)(e)(iv)(d) of the proposed NPDES order requires qualified facility personnel inspect designated equipment and areas of the "facility" on a quarterly basis and ensure that appropriate actions are taken in response to the inspections. Also Special Provisions Section C (3)(e)(v) requires comprehensive site compliance evaluations at least annually. These requirements are currently being met through compliance with other State of California regulations.

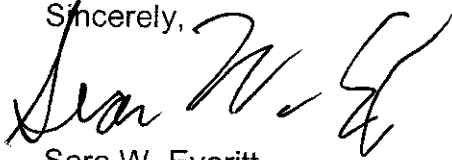
Agencies such as the California Public Utilities Commission (CPUC) and the California Independent Operator (CAISO) require certain operational and maintenance procedures that include inspections and evaluations of vaults and underground transmission facilities. The CAISO requires the submission of maintenance plans from Participating Transmission Owners for review and approval. As part of PG&E's Underground Transmission maintenance plan, PG&E inspects underground transmission vaults according to CAISO regulations.

Utilities Distribution Departments are required by the CPUC to develop and submit compliance plans for Inspections Cycles for Electric Distribution Facilities under General Order 165. This compliance plan includes rigorous details on the inspection and evaluation of vaults. They include a description of the equipment, the inspection and the schedule. Annually, each utility submits a report of the inspections to the CPUC detailing compliance.

Therefore, the proposed order should allow other agency requirements that are equivalent to be used and referenced in the Plan as appropriate. This will avoid duplication and ensure consistency.

If you have any questions please contact me at (415) 973-0707.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sara W. Everitt".

Sara W. Everitt
Principal Environmental Engineer