



## **FINAL DRAFT**

### **NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT PACKAGE FOR**

### **DISCHARGES FROM DRINKING WATER SYSTEMS**

The State Water Resources Control Board (State Water Board) issued the Draft Resolution and NPDES Permit for Discharges from Drinking Water Systems to Waters of the United States for public review on June 6, 2014 and again with revisions on July 3, 2014. The State Water Board received 56 public comment letters. State Water Board staff has made changes to the draft documents in an attempt to clarify the requirements of the draft permit and, where appropriate, to simplify compliance with the permit.

The State Water Board is providing the Final Draft Resolution indicating “tracked changes” to illustrate the changes made relative to the document issued on June 6, 2014. The number of organizational, but non-substantive changes made in the Draft Permit give the appearance that a great deal more changes were made than is actually the case. To assist interested parties in focusing their review on the substantive changes, the State Water Board is providing a clean version of the Final Draft Permit with the following summary list of substantive changes made to the July 3, 2014 draft permit and incorporated into the final draft permit document.

#### **Summary of Substantive Changes to July 3, 2014 Draft NPDES Permit**

1. Definitions were moved to the front page of the permit.
2. Language was added to clarify that the permit covers discharges from water transmission facilities.
3. The enrollment threshold was raised from drinking water systems of 15 or more connections to 1,000 or more connections.
4. Language was added to more clearly and directly explain:
  - a. Which water purveyors are not required to enroll in the permit, and the requirement and process to file a Notice of Non-Applicability Form;
  - b. Which water purveyors are required to enroll in the permit, and the requirement and process to enroll in the permit; and
  - c. The requirements of water purveyors covered under the permit.

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## Changes To July 3, 2014 Draft NPDES Permit, continued

5. The application requirement to identify all receiving waters was relaxed to require identification of only the Regional Water Quality Control Board within which discharges are located, and the named water bodies or major downstream receiving waters.
6. The requirements for compliance with maximum contaminant levels (MCLs) were replaced with receiving water limitations in accordance with applicable Regional Water Quality Control Board basin plan.
7. Language was added to clarify that Best Management Practices (BMPs) implementation is required for all discharges. The BMP specifications were consolidated in one section of permit.
8. Language was added to clarify that BMPs listed in Attachment C are provided for illustrative purposes.
9. The numeric turbidity effluent limitation of 10 NTU was removed. With regard to groundwater supply well operations, the permit now proposes that BMPs should be used to maintain a discharge turbidity of less than 100 NTU.
10. The requirement to use a handheld meter to monitor turbidity was modified to allow a visual estimate of turbidity.
11. The compliance determination threshold for chlorine effluent limitations was changed from a method detection level of 0.10 mg/L to a minimum level of 0.1 mg/L.
12. Language was added to emphasize the importance of multiple uses or beneficial reuse of discharges, including:
  - a. Application requirement to list potential multiple use or beneficial reuse options.
  - b. Annual reporting requirement of volume of discharge placed to use or reuse prior to discharge to a surface water.
  - c. Annual reporting requirement of volume of discharge not placed to use or reuse prior to discharge to surface water.
13. The requirement for event monitoring (monitoring after each discharge event) was limited to superchlorinated discharges, well development or rehabilitation discharges, and individual discharges greater than 325,850 gallons (one acre-foot).
14. The requirement for pH monitoring limited to superchlorinated discharges.
15. The requirement to use a handheld meter to monitor effluent turbidity was changed to allow a visual estimate of turbidity.

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**Changes To July 3, 2014 Draft NPDES Permit, continued**

16. A requirement to report Annual Discharge Volume was added, and includes reporting of:
  - a. The number of discharges that flow directly into surface water and that are greater than 50,000 gallons during each calendar year;
  - b. The estimated total volume of discharge to surface water during each calendar year; and
  - c. The estimated total volume of discharge to a reuse or beneficial use during each calendar year.
17. A requirement to monitor chlorine concentrations in effluent was added for all superchlorinated discharges.
18. Representative monitoring expanded to include monitoring of direct.
19. The provision allowing a Regional Water Board Executive Officer the discretion to require additional monitoring was removed. This discretion was left with the Deputy Director for Water Quality.
20. The requirement for post-notification of emergency discharges to the California Office of Emergency Services was removed. The requirement for post-notification to the Regional Water Board and the applicable Municipal Separate Storm Sewer System (MS4) operator is required.
21. Language was added to require pre-notification to the applicable MS4 operator of discharges greater than 325,850 gallons (one acre-foot).
22. The annual reporting requirements were changed to the following reporting and recordkeeping requirements:
  - a. The Discharger is required to maintain a report of all self-monitoring at its main office, and to make this available to State and Regional Board staff, upon request.
  - b. The Discharger is required to submit all non-compliant monitoring information, and all discharge volume monitoring information to the State Water Board annually.
23. A table was added to Section III.K. of the Fact Sheet (Attachment F) to facilitate identification of receiving waters that have TMDLs, and the corresponding pollutants that require monitoring.