

Overview of California's Revised Utility Vault NPDES Discharge Permit

General Permit No. CAG990002
Order WQ 2014-0174-DWQ

Presented by:
Rob Delnagro
CB&I

History

- In 2001, the State of California developed a NPDES permit which allowed for utility providers to discharge “clean” water from vaults from pumping of utility vaults/underground structures and automatic discharges such as from CEV vaults (unless there is a local ordinance).
- As part of the permit, a Notice of Intent (NOI) and Pollution Prevention Plan (PPP) had to be submitted and a routine annual sampling program performed.
- In 2011, the State asked for all the dischargers to provide a summary of the water quality data collected between 2006 and 2011
- In 2013, the first draft of the revised permit was sent out to the stakeholders for comment.
- This new permit is effective as of July 1, 2015 and runs through June 29, 2020; this permit contained some significant changes from the old permit.....

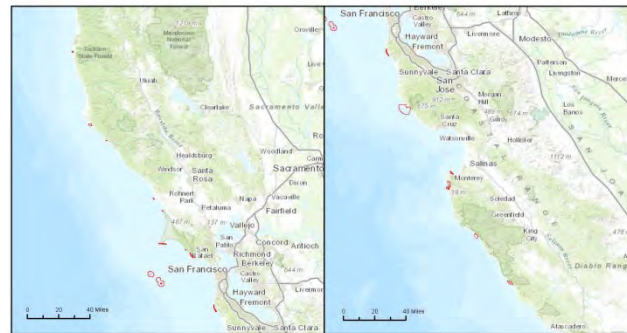
So What are the Significant Changes?

- Additional sampling events (Study 1 and Study 2) have been added to the usual annual sampling event.
- Study 1 is a two-year statewide discharge characterization study.
- Study 2 is a one-time study of what is being discharged into “Areas of Special Biological Significance” (ASBS).
- Discharges from hand holes are now covered under the permit.
- The PPP needs to detail how the utility will prevent solids from entering State waters.
- There is a statement in the permit that requires dischargers to follow MS4 permit requirements, which is being interpreted by some MS4s that they can ask for permits/advance notification.

How to Obtain Coverage

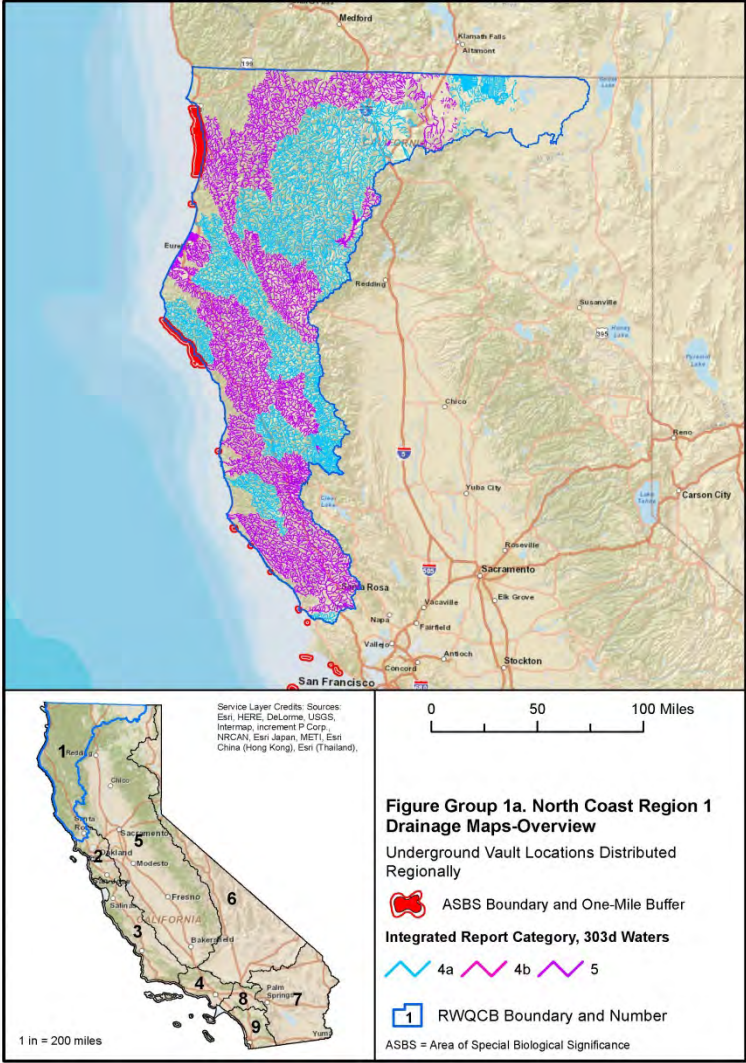
- Submit a NOI for each of the 9 RWCQBs that you plan on discharging into.
- Revise or develop a PPP that includes sections on training your employees, evaluation of analytical data and site surroundings (e.g. gas stations), discussion on automated discharges and sweeping or using filter socks/wattles in addition to evaluation of the water.
- Regional maps of the service areas, area watersheds, 303d waters, and ASBSs that the utility may discharge into via a MS4. The individual maps need to show all ~2,600 MS4 discharge locations.
- Within 30 days, provide the State the name of the utility liaison.
- Comply with individual MS4 discharge notifications requirements.

What is a ASBS??

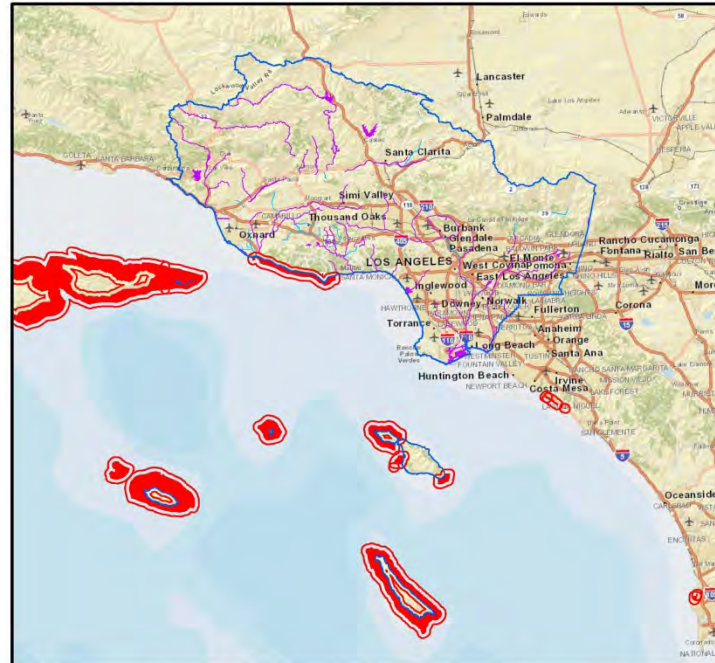


Source: ESRI and the State Water Resources Control Board

Example Regional Maps



Example Regional Maps




Service Layer Credits: Source: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand),

0 25 50 Miles

Figure Group 4a. Los Angeles Region 4 Drainage Maps-Overview

Underground Vault Locations Distributed Regionally

 ASBS Boundary and One-Mile Buffer

Integrated Report Category, 303d Waters

 4a  4b  5

 RWQCB Boundary and Number

ASBS = Area of Special Biological Significance

Challenges/Discussion of the New Permit Requirements

MS4 Notification Requirements

- Verbiage in the Permit -

E. Discharge to a Municipal Separate Storm Sewer System (MS4)

Dischargers shall comply with any notification requirements of the MS4 permit(s) of any MS4 to which they discharge and shall follow the MS4 permit's notification protocols. It is the State Water Board's intention with this requirement to encourage communication between Dischargers under this Order and local agencies responsible for MS4s to reduce misunderstandings and concerns over the types of discharges covered by this Order. This Order does not supersede the authority of the MS4 permittee to prohibit, restrict, or control storm water discharges and conditionally exempt non-storm water discharges to storm drain systems or other watercourses within its jurisdiction as allowed by state and federal law.

- Some MS4s have interpreted “notification” to mean “permit”
- There are no boundary maps for most of the 347 MS4s
- The permit specifically states that it does not supersede the authority of the MS4 to prohibit/restrict discharges
- There has been some outreach (cable, telecom and electrical) to CSQWA and the State as to what the notification should entail

MS4 Notification Requirements



City of Orinda

Notification Protocol For Discharges into MS4s From Utility Vaults and Underground Structures

2015

Prepared by:

Wendy Wellbrock
Stormwater Program Manager
22 Orinda Way
Orinda California 94563
(925) 253-4251

based on the 2015 model developed by the
Contra Costa Clean Water Program

City of Orinda Notification Protocol for Discharges into MS4 from Utility Vaults and Underground Structures

1. An encroachment permit application must be submitted for each discharge.
2. At least **5 business days** prior to the date of the planned discharge, the utility company must submit the following documents:
 - A. A completed encroachment permit application. As part of the encroachment permit application, a traffic control plan may also be required.
 - B. A copy of the utility's NPDES permit for the initial discharge.
 - C. A copy of the utility's Pollution Prevention Plan for the initial discharge.
3. An estimate of the volume of wastewater to be discharged, the approximate duration of the discharge, and the location of the storm drain inlet where the wastewater will enter.
 - <1000 gallons
 - 1,000 gallons – 10,000 gallons
 - 10,000 gallons – 50,000 gallons
4. At least **48 hours** in advance of the planned discharge, the utility company must call the Public Works Inspector at (925) 766-5757 and provide written notification to the Public Works Department to allow municipal staff the opportunity to inspect the site prior to the discharge and during discharge operations.
5. Municipal staff may determine to prohibit the discharge or may determine that the discharge should cease before it is completed.
6. For Emergency discharges, the utility company must call the Public Works Inspector at (925) 766-5757 within **24 hours** of the start of the emergency discharge. As part of this contact, the utility company must provide the location of the vault or underground structure, an estimate of the volume of wastewater being discharged, and the location of the storm drain inlet that is receiving the wastewater. The utility company must provide the same information as outlined in Step 2 within **1 business day** of the emergency discharge.

Study 1 – Statewide Characterization

- A work plan detailing collection of samples from five utility vaults in each RWQCB needs to be submitted by March 1, 2016.
- Phase I of the sampling is to be conducted no later than the first rainy season (Fall 2016), however the Permit states that sampling can be pushed to the second rainy season if vaults are dry.
- The Phase I Samples to be analyzed for Priority Pollutants, hardness and pH (costly, ~\$1,100/sample)
- The results are compared to Water Quality Objectives, with any exceedances to be analyzed for in the Phase II sampling
- The Phase II sampling is conducted no later than the third rainy season, and can be pushed back to the fourth rainy season if the vaults are dry.
- A report is then generated detailing the results and submitted to the State.

Implementation Schedule

Implementation Schedule – Study 1 (Statewide Characterization):

July 1, 2015 to March 1, 2016 – Prepare Monitoring Plan/Schedule for Discharge Characterization Study 1

March 1, 2016 to May 1, 2016 – Review by SWRCB

November 1, 2016 to March 1, 2017 – Conduct Phase I Monitoring (no later than the first rainy season following approval of Monitoring Plan)²

November 1, 2017 to March 1, 2018 – Conduct Phase II Monitoring (no later than the third rainy season following approval of Monitoring Plan)²

July 1, 2019 – Complete Discharge Characterization Study 1

January 1, 2020 – Submit Discharge Characterization Study 1 Report

2: Phase I and II Monitoring can be pushed into next rainy season if vaults are dry

Study 2 – ASBS Study

- The State has asked that a one-time sampling program be completed for vaults (up to 5) that discharge into a ASBS via a MS4
- There are 34 ASBSs located along the coast, fortunately most are not in highly populated areas
- An estimate of the amount of water discharged into each ASBS that year is required
- The data will be evaluated by the State to determine if the discharges impact water quality
- By November 15, 2015 the discharger will either need to identify all vaults that discharge into a ASBS or within a ½-mile of one
- The RWQCB has the authority to deny specific discharges from utility vaults
- Direct discharges into a ASBS is not allowed (well, unless you have an exception to the California Ocean Plan)
- Only discharges to a PERMITTED MS4 is allowed and the discharger needs to determine that before discharging

Implementation Schedule

Implementation Schedule – Study 2 (ASBS):

July 1, 2015 to November 1, 2015 – Identify MS4s with Potential to Receive ASBS Discharges

July 1, 2015 to March 1, 2016 – Prepare Monitoring Plan/Schedule for Discharge Characterization Study 2

November 1, 2016 to March 1, 2018 – Conduct Phase I Monitoring³

July 1, 2018 – Complete Discharge Characterization Study 2

January 1, 2019 – Submit Discharge Characterization Study 2 Report

3: Phase I needs to be begun no later than the second rainy season, and Phase II complete by the third rainy season

Other “Challenges”

- The permit asks for the estimated volume discharged per year by WDID (or RWQCB) , so a means of quantifying or estimating volumes needs to be put in place
- The new permit identifies screening limits to compare results of the annual sampling, with any exceedances evaluated and corrective actions implemented
- An executive summary section in the annual sampling report now needed, with a discussion of any violations, corrective actions taken, and a evaluation of the PPP effectiveness
- The permit is a challenging read....

Thanks!

Rob Delnagro

Senior Project Manager

Tel: +1 916 565 4343

Cell: +1 510 872 6577

Fax: +1 916 565 4356

rob.delnagro@cbi.com

CB&I

180 Promenade Circle, Suite 320

Sacramento, CA 95834

