

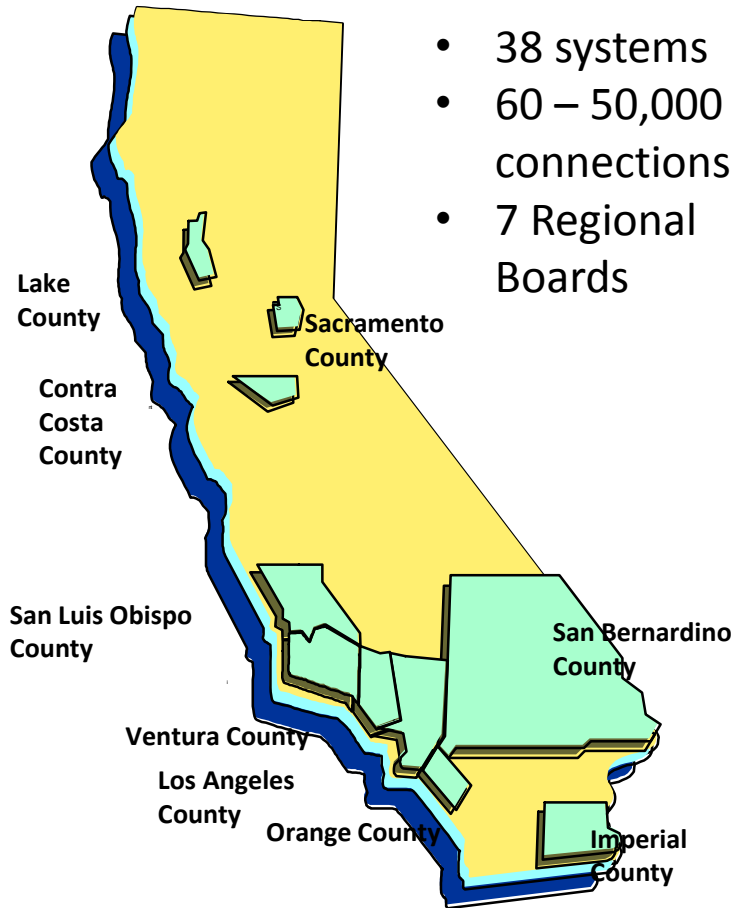
Utility Perspective: New Statewide NPDES permit



Golden State
Water Company
A Subsidiary of American States Water Company

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CWA Conference
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Multi-System Utility Perspective



- SWRCB Partnership
- Fees
- Small systems
- Local relationships
- CWA vs. SDWA
- Receiving Water Monitoring
- Waters of the US
- Annual Volumes

- Permit is based on existing Best Management Practices
- Does not require compliance with MCL at point of discharge
- Two vs. eleven effluent limits
- Visual receiving water monitoring

Service Connections	Application Fee Only	Application & Annual Fee
15 - 999	\$100	
1,000 – 9,999		\$500
10,000+		\$2,062
Transmission Only		\$2,062

- Fees can change annually
- If you have multiple systems, you can enroll all of them for one application fee but must submit multiple NOIs
- Annual fee is based on number of systems

Very Small Systems

- Less than 1000: Permit does not exempt dischargers from Clean Water Act.
- Discharging to a Water of the US without a permit is in violation of the federal law.
- Discharging water without a permit can result in large fines.
- One time \$100 application fee

- This is not a right to discharge
- Flood control can still impose additional requirements via city or county ordinances
- Notification requirements for large planned discharges and any discharge that impacts the environment

CWA vs. SDWA

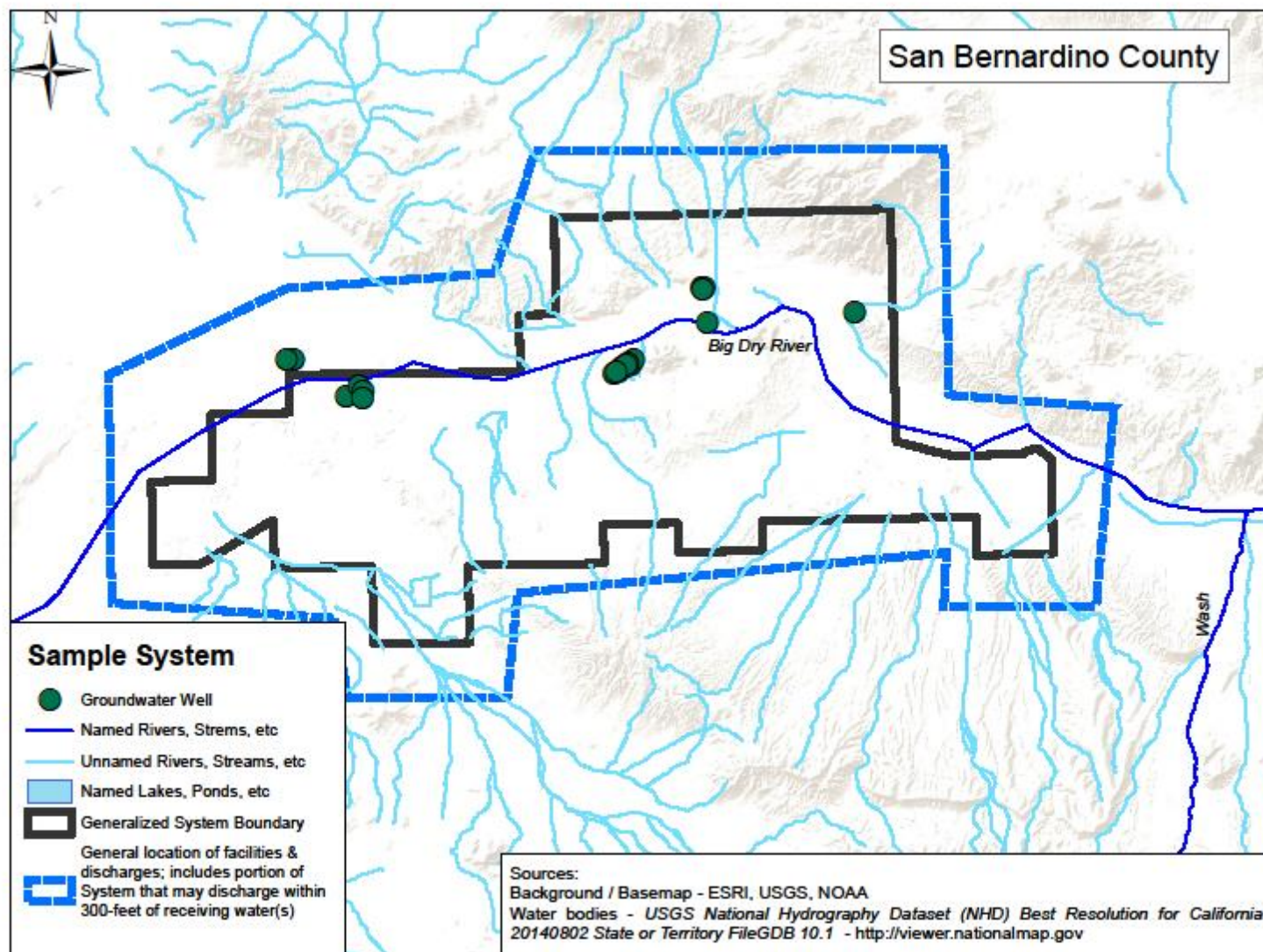
- CWA and SDWA are fundamentally different.
- Under SDWA, you follow the rules and you are in the clear.
- Under CWA, the rules are more like minimums. Follow them and you can still be liable for damages to the environment.

Receiving Water Monitoring

- Permit requires visual receiving water monitoring if there is an impact from a planned discharge.
- Unplanned discharges may cause environmental impacts.
- Monitoring may help demonstrate no impact.
- *May want to conduct monitoring as part of risk and liability management.*

- Site schematic & annual reporting of volumes
- Under definitions, receiving water body is a *Water of the United States*
- 1972 CWA: Fishable, Navigable, Swimmable
- 2015: Tributary to navigable and fishable with evidence of bed, bank, high water mark and significant nexus.
- This can be a dry creek bed

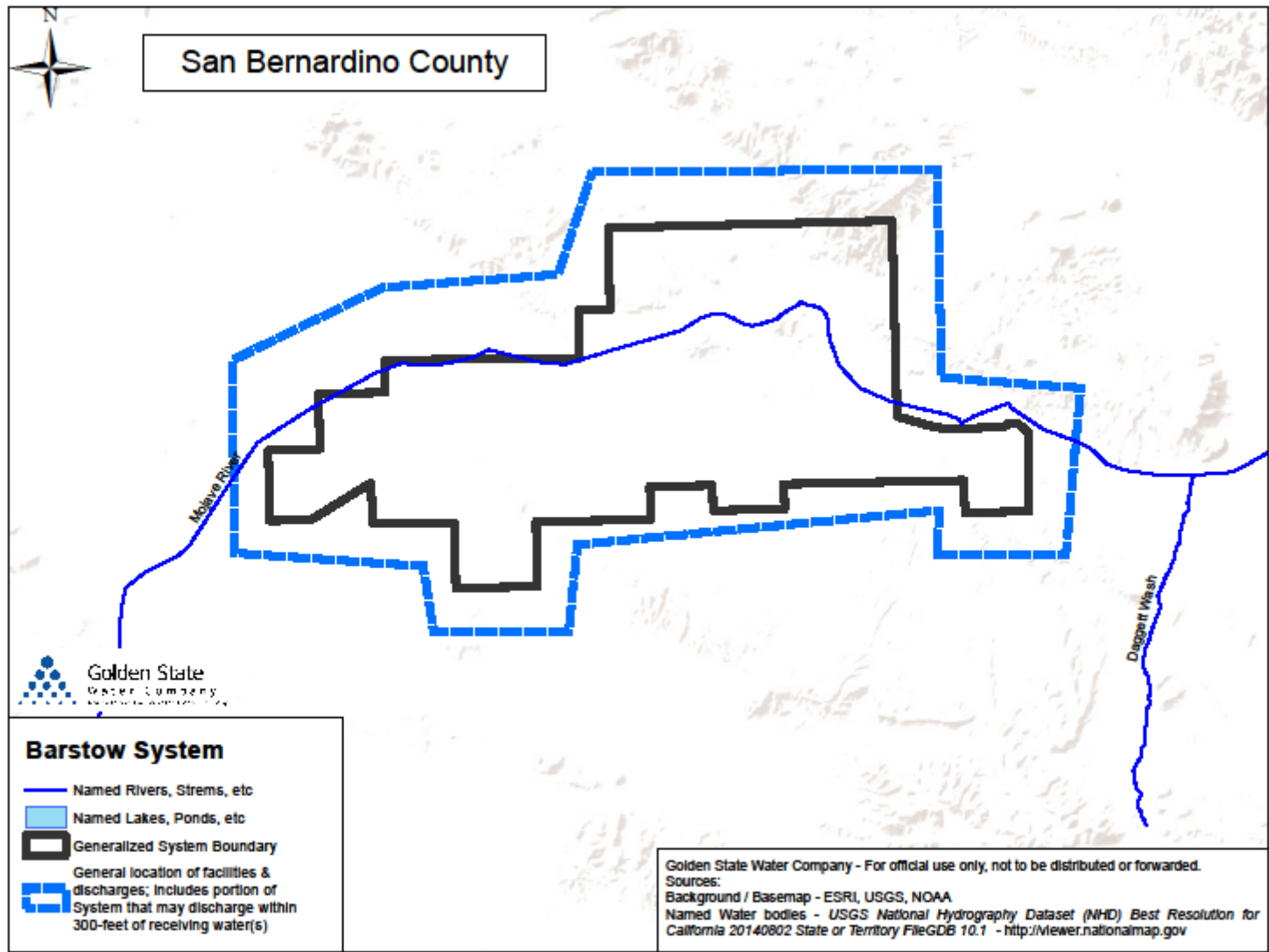
- The future: Water of the US definition is under revision. Proposal would include anything that ever has water in it at any time.
- Includes ephemeral streams, rain fed streams, ditches and gullies but not erosional features.
- Checked with seven of the RBs and all Districts of Army Corp, no guidance on WOTUS, get consultant.











Annual Reporting of Volumes

Recordkeeping	Reporting
<ul style="list-style-type: none">• Table of all monitoring data• Log of BMPs implemented• Training records, use of colorimeter, permit reqs & BMPs• Records kept for 3 years	<p>Non Compliance</p> <ul style="list-style-type: none">• Cover letter summary of all non-compliant discharge monitoring information• All NC monitoring data• Corrective actions that demonstrate a return to compliance• Digital photographs/Docs of NC impacts <p>Water Use</p> <ul style="list-style-type: none">• Number of direct discharges to a WOTUS > 50,000 gallons• Estimated volume discharged to WOTUS• Estimated volume of discharge water directed to a reuse or beneficial use <p>Representative Monitoring</p> <ul style="list-style-type: none">• Update Site Schematic, label representative monitoring locations• ID portion of system that monitoring represents• ID any changes in representative monitoring

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