GUIDANCE ON THE DISCHARGE OF WATER

FROM PUBLIC WATER SUPPLY SYSTEMS

FINAL January 7, 2010

Revised November 29, 2010

ISSUE: Public water supply systems must be periodically "flushed" (e.g. finished water from clear wells, storage tanks, and distribution lines) for maintenance purposes. Where can this water be legally discharged?

OPTIONS:
When it is necessary for a public water supply system to conduct maintenance activities on their storage tanks and associated infrastructure, the chlorinated potable water must be disposed of in a proper manner. There are several options available to public water suppliers including:

1. **Discharge the water into "waters of the state"** – this is the least preferred option and should only be used as a last resort since it will require the issuance of a NPDES permit for the discharge. If this is the only feasible option, the wastewater permitting staff in the DEP District Offices should be contacted to discuss the potential NPDES and SDWA permitting requirements.

2. **Discharge the water into a permitted stormwater system**. Since 1982, all new development and redevelopment activities in Florida have had to obtain state permits (either stormwater or environmental resource permits) and manage their stormwater for both flood control and water quality protection. While stormwater systems are designed to only accept and manage stormwater (which is defined as the flow of water resulting from and occurring immediately following a storm event), they can be used for ancillary purposes provided that those activities do not adversely affect the proper functioning of the stormwater system. Previous examples of such activities include airplane washing at military bases and car washing at residential condominium projects. If a public water supplier elects to use this option, the following steps must be taken before any potable water is discharged to the permitted stormwater system:
    a. The PWS maintenance activities shall be scheduled to occur during the "dry season" and during a period of time when a storm is not predicted to occur. Florida's "dry season" typically occurs from October through April.
    b. The PWS water may need to be dechlorinated if it will be discharged into any type of BMP with a permanent wet pool including a wet detention pond, detention with filtration pond, or wetlands stormwater system, and the discharge is expected to exceed the total residual chlorine standard in jurisdictional surface waters or cause an exceedance of chlororganic MCLs in the receiving waters.
    c. The public water supplier shall determine the volume of water that will be discharged in acre-feet, the discharge rate in cfs, the duration of time in hours over which the discharge will occur, and identify permitted stormwater facilities that may be candidates to receive the water.
    d. The public water supplier shall contact the owner/operator of the permitted stormwater system that is proposed to receive the potable water discharge and provide the information in (b) above. The stormwater system owner/operator

shall evaluate whether the stormwater system has adequate capacity during a dry period without a storm event to safely accept and manage the discharge from the potable water supply system.

e. The stormwater system owner/operator shall provide written permission to the public water supplier to discharge potable water to the stormwater system and include any conditions and requirements that must be met.

3. **Discharge to a local government stormwater system** – The "master drainage system" owned and operated by local governments collects and conveys stormwater to provide flood protection. Typically, these conveyance systems discharge to "waters of the state" although in some cases certain conveyances will discharge into a permitted stormwater system in which case the procedures in 2. above shall be followed. In addition, many local government drainage systems are permitted by DEP pursuant to the NPDES Municipal Separate Storm Sewer System (MS4) regulations. These rules specifically allow certain non-stormwater discharges into the MS4 system as set forth in Section 62-624.200(2), F.A.C. and listed below: **(Emphasis added.)**

> 2) Illicit discharge means any discharge to a municipal separate storm sewer that is not composed entirely of stormwater except discharges pursuant to an NPDES permit and the following categories of non-stormwater discharges provided they do not cause a violation of water quality standards:
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> **(a) Water line flushing,**
> (b) Landscape irrigation,
> (c) Diverted stream flows,
> (d) Rising ground waters,
> (e) Uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)),
> (f) Uncontaminated pumped ground water,
> **(g) Discharges from potable water sources,**
> (h) Foundation drains,
> (i) Air conditioning condensate,
> (j) Irrigation water,
> (k) Springs,
> (l) Water from crawl space pumps,
> (m) Footing drains,
> (n) Lawn watering runoff,
> (o) Water from individual residential car washing,
> (p) Flows from riparian habitats and wetlands,
> (q) Dechlorinated swimming pool discharges,
> (r) Residual street wash water, and
> (s) Discharges or flows from fire fighting activities.

If the public water supplier elects to discharge potable water to the MS4 system, it shall:

a. Schedule the PWS maintenance activities to occur during the "dry season" and during a period of time when a storm is not predicted to occur. Florida's "dry season" typically occurs from October through April-May.
b. Determine the volume of water that will be discharged in acre-feet, the discharge rate in cfs, the duration of time in hours over which the discharge will occur, and

identify the specific stormwater conveyance and place into which the potable water will be discharged.

c. The public water supplier shall contact the local government that owns/operates the stormwater conveyance that is proposed to receive the potable water discharge and provide the information in (b) above. The local government owner/operator shall evaluate whether the stormwater conveyance has adequate capacity during a dry period without a storm event to safely accept and manage the discharge from the potable water supply system.
d. The local government or MS4 permittee shall provide written permission to the public water supplier to discharge potable water to the stormwater conveyance and include any conditions and requirements that must be met.
e. The public water supplier shall take appropriate actions to dechlorinate the potable water before discharging to the stormwater conveyance, where necessary to prevent an exceedance of TRC or chlorine by-product MCLs in the receiving surface waters.