



SAN FRANCISCO PUBLIC UTILITIES COMMISSION

PLANNING BUREAU

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November 10, 2004

Ms. Dena McCann
Division of Water Quality
State Water Resources Control Board
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Subject: Comments on the Proposed Revision to the "Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California"

Dear Ms. McCann:

The San Francisco Public Utilities Commission (SFPUC) appreciates the opportunity to comment on potential changes to the State Implementation Policy (SIP). We support these changes and encourage the Board to adopt them as expeditiously as possible. These changes will improve the flexibility of the SIP and allow for more site-specific permitting. The proposed modifications will also allow permittees to focus their pollutant control efforts on those pollutants most likely to be causing adverse affects in waterways.

The three topics addressed by the proposed amendments are the following:

- 1. Allow for Water Effects Ratio (WER) to be established as part of the permit process*
Allowing calculation of effluent limits using the Water Effects Ratio (WER) procedure for specific discharges, when appropriate, allows for more tailored permits which are better able to address site-specific conditions.
- 2. Eliminate the reasonable potential trigger for situations where ambient background concentrations are greater than criteria*
The use of background exceedances of criteria to require the establishment of permit limits wastes administrative resources and leads to meaningless limitations and unnecessary monitoring. Removing this trigger will allow both regulators and dischargers to focus on pollutants in effluents which are more likely to present a risk to receiving waters.

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3. *Clean-up non-regulatory language.*

Adding clarity to the SIP procedures is obviously beneficial.

Thank you for the opportunity to provide comments. If you have any questions, please do not hesitate to contact Arleen Navarret at (415) 934-5731.

Very truly yours,

A handwritten signature in black ink that reads "M. P. Carlin". The signature is stylized with large, rounded letters and a long, sweeping underline that extends to the right.

Michael P. Carlin
Planning Bureau Manager