



MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

July 14, 2006

Song Her, Clerk to the Board
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814



Dear Ms. Her:

Comments – Chlorine Policy:

Comments On June 2006 Revised Draft Of The State Water Resources Control Board (SWRCB) Total Residual Chlorine And Chlorine-Produced Oxidants Policy Of California

The Metropolitan Water District of Southern California (Metropolitan) supports the revisions that have been made to the June 2006 revised draft of the SWRCB Total Residual Chlorine And Chlorine-Produced Oxidants Policy Of California (TRC Policy). As a key stakeholder in the TRC Policy development, Metropolitan has been providing comments on the proposed TRC Policy and working closely with the SWRCB staff since the initial Scoping Meeting in July 2005. The new language included in this version of the TRC Policy and Substitute Environmental Document (SED) addresses our concerns and issues expressed during the previous public comment periods and at the Public Hearing held on June 19, 2006.

We are appreciative that the SWRCB staff and Board took the time and effort during the rulemaking process to understand the limitations and technology restrictions faced by the drinking water utilities when conducting various types of dewatering activities in the field. The changes made to the June 2006 draft TRC Policy now allow certain exceptions and acknowledge that it is infeasible to impose numeric effluent limits on potable water discharges because these discharges occur in the field and field-monitoring equipment does not currently achieve the necessary level of performance.

We also support the amendments made to the June 2006 Substitute Environmental Document (SED). The SED now includes an explanation of the infeasibility of regulating potable water discharges and stipulates that the permitting authority must regulate these discharges through requirements for appropriate best management practices (BMPs) and appropriate monitoring or other measures to ascertain whether the best management practices are effective. As confirmed by SWRCB staff at the June 2006 Public Hearing, this allows drinking water utilities to continue to be regulated under MS4 permits or general permits that require implementation of BMPs to reduce pollutants to the maximum extent possible.

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Thank you again for the opportunity to participate in the development of the TRC Policy and for the efforts of the SWRCB staff to work with us to resolve our issues in a cooperative process. If you have any questions regarding our comments, please contact Ms. Joyce Clark at (213) 217-5593.

Very truly yours,



Daniel J. Guillory, Environmental Program Management Team

JTC/ pwr R-06-184

cc: Mr. David Bolland, ACWA
Ms. Danielle Blacet, ACWA