

City Council

311 Vernon Street
Roseville, California 95678-2649

June 5, 2006

Song Her, Clerk to the Board
State Water Resources Control Board
Executive Office 1001 I Street, 24th Floor
Sacramento, CA 95814
Fax: (916) 341-5620
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Subject: Comments on the Proposed Total Residual Chlorine And Chlorine-Produced Oxidants Policy Of California

Dear Ms. Her:

The City of Roseville appreciates this opportunity to submit comments on the State Water Resources Control Board (SWRCB) Proposed Total Residual Chlorine And Chlorine-Produced Oxidants Policy Of California (TRC Policy). Our city provides both water and wastewater utility services to over 106,000 residents within South Placer County. The City's water utility includes a 60 million gallon per day surface water treatment plant as well as numerous drinking water storage reservoirs and distribution pipelines. The City's wastewater utility operations include wastewater collection systems and two regional wastewater treatment facilities, which serve the City of Roseville, the City of Rocklin and portions of Placer County. The City is also a Phase II MS4 under the State of California municipal stormwater program. Please accept the following comments pertaining to the TRC Policy.

Water Utility Issues

The revised language in the April 2006 draft of the proposed TRC Policy unintentionally captures drinking water dischargers operating under an NPDES permit, including the City of Roseville. It is our understanding SWRCB staff did not intend to capture potable water discharges under the proposed TRC Policy. This is confirmed by the fact there are no cost estimates for water utilities to comply with the TRC Policy contained in the April 2006 Economic Considerations for Proposed Total Residual Chlorine and Chlorine-Produced Oxidants Policy for California.

The proposed TRC Policy is a critical issue for the City because we cannot dechlorinate to the level that is being required under the proposed TRC Policy. Water utilities must dewater pipelines or reservoirs and flush fire hydrants to ensure public health. These activities must be performed in order to comply with the Department of Health Services regulations for safe drinking water.

Specifically, the City is required to dechlorinate potable water discharges in the field. There is no field monitoring equipment currently available that will detect total residual chlorine to the proposed TRC Policy dechlorination level of 0.019 mg/L (1-hr average, freshwater). The City's water utility is regulated under the City's MS4 Permit and other RWQCB General Permits to ensure that potable water discharges do not impact water quality. Under these

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permits, water utilities are required to implement Best Management Practices or meet numeric effluent limits to reduce the discharge of total residual chlorine to the maximum extent practicable. The SWRCB staff has acknowledged that regulation of these discharges in this manner is the only feasible option and the only alternative since it is not technically feasible for potable water discharges to complying with the proposed TRC Policy numeric effluent limits.

The SWRCB has indicated the current language in the April 2006 draft produced unintended consequences for potable water discharges; we understand the SWRCB will present revised language at the Public Hearing on June 19, 2006. We are awaiting review of the revised language that will resolve the issue described above. Until that time, we are providing the recommendation below for your consideration.

Recommendation

It is recommended the SWRCB include language in the TRC Policy and Substitute Environmental Document that states it is not technically feasible for potable water dischargers to comply with the TRC Policy numeric effluent limits as authorized under the Code of Federal Regulations, Title 40, Section 122.44(k), revised July 1, 2004. It is recommended that the SWRCB instead establish a conditional authorization or other exclusion in the TRC Policy that allows potable water dischargers to continue to be regulated under MS4 Permits or RWQCB General Permits.

In addition to the above recommendation, the City of Roseville supports the conclusions and recommendations contained in the June 5, 2006 letter from the Association of California Water Agencies as well as the comments from the California Association of Sanitation Agencies, the Central Valley Clean Water Agencies and Tri-TAC.

Thank you for considering our comments. If you have any questions regarding our concerns, please contact Derrick Whitehead, Environmental Utilities Director at (916) 746-1704.

Very truly yours,



Gina Garbolino
Mayor