



IRVINE RANCH WATER DISTRICT

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June 5, 2006

Song Her, Clerk to the Board
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814
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Subject: Comments on SWRCB Draft Total Residual Chlorine and Chlorine Produced Oxidants Policy of California

Dear Ms. Her:

Thank you for the opportunity to submit comments on the draft Total Residual Chlorine (TRC) and Chlorine-Produced Oxidants (CPO) Policy of California (the Policy), dated April 2006. The Irvine Ranch Water District (IRWD) has commented on previous policy versions and still supports its previous comments. It appears that the State Water Resources Control Board (SWRCB) has acknowledged a number of the concerns that have been expressed by the community that will be regulated under the proposed policy and has incorporated some revisions to make the policy more workable from regulatory and practical application perspectives.

As a California Water District that provides both domestic and non-potable water through two separate and extensive water distribution systems, IRWD has a number of the same concerns as the water agencies who have provided detailed comments on the proposed policy and strongly supports the comments provided by the Metropolitan Water District, East Bay Municipal Utilities District and others. We have highlighted our specific concerns with respect to domestic and non-potable water system operations below.

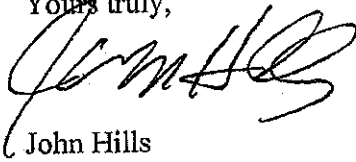
- We would like to evaluate proposed policy language regarding discharges from water distribution systems prior to policy adoption.
- We would like to evaluate any proposed policy language that addresses the inherent difficulty with operating chlorine residual monitoring equipment, under less than ideal field conditions, imposed by current policy language.
- We are concerned that the proposed policy does not fully consider the prescriptive effect of SB709, The Clean Water Enforcement and Pollution Prevention Act of 1999, with respect to water distribution system maintenance, operations, and system failures, which could expose water agencies to penalties, not anticipated under SB709.

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We understand the desire of the SWRCB to adopt a comprehensive statewide policy toward total chlorine residual and chlorine produced oxidants, however, we are concerned that the proposed policy does not resolve the concerns we have with respect to achieving the proposed limits in a quantifiable and verifiable manner. We suggest that, after reviewing the proposed policy, the SWRCB return it to staff for further clarification and modification.

If you have any questions, please call me at 949-453-5850 or e-mail me at hills@irwd.com.

Yours truly,



John Hills
Director of Water Quality