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HEADQUARTERS

4232 Las Virgenes Road
Calabasas, CA 91302
(818) 251-2100
Fax (818) 251-2109

WESTLAKE

FILTRATION PLANT

(818) 251-2370
Fax (818) 251-2379

**TAPIA WATER
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Fax (818) 251-2309

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www.lvmwd.com

MEMBER AGENCY OF THE
METROPOLITAN WATER
DISTRICT
SOUTHERN CALIFORNIA



July 14, 2006

Song Her
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

via e-mail

Subject: Comments to the Draft Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California

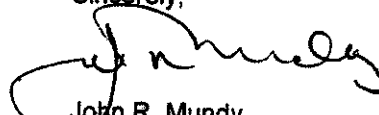
The Las Virgenes Municipal Water District and our Joint Powers Authority partner, Triunfo Sanitation District, own and operate the Tapia Water Reclamation Facility. The 16-mgd facility provides tertiary treated and disinfected recycled water to its customers in Calabasas, Hidden Hills, Westlake Village, Agoura Hills, unincorporated areas of Los Angeles County and some portions of Ventura County. The District operates the facility under an NPDES permit that allows discharge of surplus recycled water to Malibu Creek and/or the Los Angeles River. The recycled water is dechlorinated prior to discharge.

We offer the following comments on the proposed policy:

1. The best available technology for field kits or continuous flow analyzers cannot measure to 0.010 mg/L level as required in these draft regulations, or report to a result low enough to show compliance with the 0.011 or 0.019 mg/L discharge limit. Detection levels for field kits and continuous analyzers under optimum conditions, using potable water, are 0.1 mg/L and 0.05 mg/L, respectively. Limits specified in the policy should be consistent with the detection levels of available monitoring instruments.
2. Over-sulfonation may be practiced by NPDES permittees to avoid momentary false positive detection of chlorine and maintain compliance with the policy. However, this practice wastes chemicals and potentially leads to dissolved oxygen depletion that impairs the beneficial use of the receiving water.

We appreciate this opportunity to comment on the proposed policy. Please contact Carlos G. Reyes at (818) 251-2330 if you would like further information regarding our comments.

Sincerely,


John R. Mundy
General Manager