



John V. Rossi
General Manager

Kevin D. Jeffries
President

Elizabeth L. Cunnison
Vice President

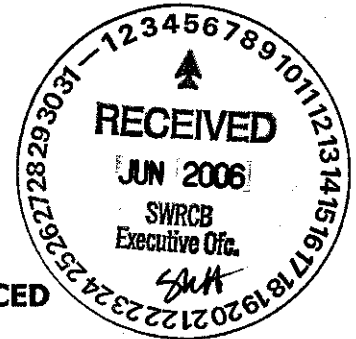
Wayne H. Holcomb
Secretary/Treasurer

Donald D. Galleano
Director

S.R. Al Lopez
Director

June 5, 2006

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



**COMMENTS ON STATE WATER RESOURCES CONTROL BOARD
PROPOSED TOTAL RESIDUAL CHLORINE AND CHLORINE-PRODUCED
OXIDANTS POLICY**

Dear Ms. Her:

On behalf of Western Municipal Water District (WMWD), thank you for the opportunity to submit comments on the proposed Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California (TRC Policy) dated April 2006. These comments apply to WMWD's drinking water operations and are not intended to apply to our publicly-owned treatment works.

WMWD was formed by the voters in 1954 to bring supplemental water to growing western Riverside County. Today, the District serves more than 18,000 retail and 9 wholesale customers with water from both the Colorado River and the State Water Project. As a member agency of the Metropolitan Water District of Southern California (MWD), Western provides supplemental water to the cities of Corona, Norco, and Riverside, and the water agencies of Elsinore Valley and Rancho California. Western's general district consists of a 510-square mile area of western Riverside County with a population of more than one-half million people.

As both a wholesale and retail drinking water supplier, the District is concerned with protecting water quality. Our Engineering and Operations staffs are actively involved in all aspects of water quality management to ensure an adequate supply of safe and reliable drinking water. Western has always welcomed and encouraged the support of the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) in their efforts to protect water quality throughout California. However, we have several concerns regarding the draft TRC Policy that are summarized below.

Regulatory Policy

Based on the September 29, 2005 stakeholder meeting at MWD in Los Angeles and subsequent discussions with SWRCB staff, it is the District's understanding that the SWRCB did not intend to include drinking water discharges under the TRC Policy since these types of discharges are appropriately regulated under the Municipal Separate Storm Sewer System (MS4) Permits and RWQCB General Permits. We further understand that Board staff did not include a cost estimate for water utilities to comply with the TRC Policy in the Economic Analysis of the Substitute Environmental Document (SED) for this reason. However, the April 2006 draft Policy and SED now unfortunately includes almost all drinking water dischargers.

We understand that the SWRCB is currently working to correct the unintended consequences of the TRC Policy by providing a conditional authorization or other exclusion that would allow drinking water discharges to continue to be regulated under MS4 Permits or RWQCB General Permits, and that Board staff intends to present the revised language at the June 19, 2006 Public Hearing. We look forward to reviewing the revised language, and appreciate your responsiveness in addressing drinking water utility concerns regarding this matter.

This is a complex issue with potentially significant impacts on our utility if the TRC Policy is adopted without certain revisions. Western Operations staff periodically dewater pipelines and reservoirs, and flushes distribution system piping on a routine basis to maintain high water quality. Such activities are currently regulated under MS4 Permits or RWQCB General Permits, which require implementation of Best Management Practices (BMPs) or compliance with numeric effluent limits that are based on Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) to reduce the discharge of total residual chlorine to the Maximum Extent Practicable. These BMPs are highly effective in destroying chlorine that is present in such discharges and ensuring environmental protection. Therefore, it is Western's position that the existing approach towards regulating chlorine in drinking water discharges be continued.

Detection Limits

WMWD's field monitoring equipment (which is widely used by many California water utilities) cannot achieve the detection limits specified in the TRC Policy. Western staff is unaware of any field monitoring equipment currently available that will detect total residual chlorine to the proposed TRC Policy de-chlorination level of 0.019 mg/L (1-hr average).

Compliance with the Intermittent Limit

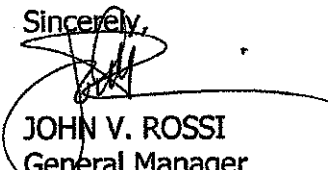
The proposed TRC Policy states that under the intermittent limit, non-compliance for each sample will be considered separately. Western believes this is inconsistent with Senate Bill 709, which states that a single operational upset leading to simultaneous violations of more than one pollutant parameter shall be treated as a single violation.

Recommendation

Western Municipal Water District respectfully recommends that the SWRCB include explicit language in the TRC Policy and SED specifically stating that it is technologically infeasible for potable water discharges to comply with the TRC Policy numeric effluent limits as authorized under the Code of Federal Regulations (CFR), Title 40, §122.44(k), revised July 1, 2004. We would further recommend that the SWRCB instead establish a conditional authorization or other exclusion in the TRC Policy that allows potable water discharges to continue to be regulated under MS4 Permits or RWQCB General Permits that require the implementation of BMPs and/or BAT-based numeric effluent limits to reduce the discharge of total residual chlorine to the maximum extent practicable.

Again, Western Municipal Water District appreciates the opportunity to comment on the proposed TRC Policy. Thank you for your consideration of our recommendation. If you have any questions regarding these comments, please contact me at 951.789.5075.

Sincerely,



JOHN V. ROSSI
General Manager
Western Municipal Water District
JVR/sf