



# California Regional Water Quality Control Board Los Angeles Region

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|---------------------------|------------------------------|
| To <i>Song Her</i>        | From <i>Augustine Anjelo</i> |
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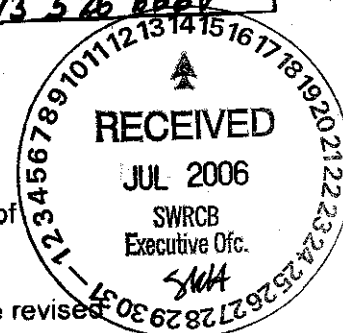
TO: Song Her, Clerk to the Board  
State Water Resources Contrc  
1001 I Street,  
Sacramento, CA 95814

FROM: Jonathan S. Bishop  
Executive Officer

Chlorine Policy  
Deadline: 7/14/06 5pm

DATE: July 14, 2006

SUBJECT: Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California



We have specific comments on the italicized paragraph below, on Page 6 of the revised subject document.

*"The State Water Board has determined that, at the present time, it is infeasible to use numeric effluent limits for TRC and CPO are infeasible to regulate potable water discharges that occur in the field due to the activities of drinking water utilities or agencies. These activities include, but are not limited to, dewatering pipelines and reservoirs, flushing distribution system piping, and flushing fire hydrants. Numeric effluent limits are infeasible because these discharges occur at disperse locations in the field, there are no stationary treatment facilities at these locations, and field monitoring equipment does not currently achieve the necessary level of precision performance. The Regional Water Boards permitting authority must regulate the discharge of TRC and CPO in these discharges through requirements for appropriate best management practices."*

This Regional Board has always had effluent limitation of 0.1 mg/l for residual chlorine for potable water dischargers covered under general or individual NPDES permits. Complying with this limit has not been a major issue to our awareness in regulation of potable water discharges. Some how, potable water dischargers have managed to comply with the 0.1 mg/l through implementation of dechlorination measures and/or techniques.

Water purveyor discharge potable water from various activities like well development pumping and aquifer test, super chlorination to rehabilitate bio-fouled well, pipeline hydrostatic testing, draining of reservoirs and tanks. Discharges from these activities are of short-duration, but of significant volume, usually in millions of gallons per day. Other than discharges from public owned treatment works discharges of potable water from various operations of water purveyors constitute the primary source of chlorine residual loading to surface waters. Therefore, chlorine residual is the primary constituent of concern in potable water discharges that needs to be regulated. Beside emergency potable water discharge activities, operational discharges from potable water supply activities are point source discharges that can be controlled and managed.

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TRC/CPO Policy

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It may be difficult for water suppliers to achieve the level of performance necessary to comply with the TRC/CPO limits proposed in the policy. As a matter of public health issue purveyors have no choice in regards to maintaining high residual chlorine in their transmission lines. So they should not be penalized for protecting public health. However, is imperative that some type of numerical goal/trigger level or threshold should be used in conjunction with BMP to regulate TRC/CPO in potable water discharges. The TRC/CPO policy should be more specific in terms of minimum BMP performance criteria for reduction or elimination of TRC/CPO in potable water discharges.

Granted many potable water discharges dissipate (evaporate/percolate) prior to reaching wet creeks or rivers. It might be that TRC/CPO minimum threshold or trigger levels will only be applicable to direct discharges to non-dry streams. For indirect discharges that may not reach a wet stream, BMPs only could be applicable. The policy should be more specific in clarifying how BMPs will be applicable.

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