



Association of California Water Agencies

Leadership Advocacy Information Since 1910

Chlorine Policy
Deadline: 7/14/06 5pm

July 13, 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 the California State Water Resources Control Board (SWRCB) Proposed Revisions to the Total Residual Chlorine and Chlorine-Produced Oxidants Policy

Dear Ms. Her:

The Association of California Water Agencies appreciates this opportunity to provide our comments on the June 2006 revised draft of the "Total Residual Chlorine and Chlorine-Produced Oxidants Policy" (Chlorine Policy) released for stakeholder comment on June 30, 2006.

ACWA represents over 450 public water agencies in California that collectively supply over 90% of the water delivered in California for domestic, agricultural and industrial uses. ACWA agencies include Publicly Owned Treatment Works (POTWs) that discharge wastewater or operate recycled water facilities to provide additional beneficial uses for "waste" water, utilities that manage and discharge treated stormwater, and also many agencies that provide drinking water for residents and business throughout the state. In most cases, chlorine is used to treat these waters to protect public health. ACWA agencies are integrally involved in all aspects of surface water and groundwater management statewide to ensure that water supply needs are adequately addressed and acceptable surface water and groundwater quality is maintained.

ACWA drinking water agencies have been working diligently with SWRCB staff to address issues regarding the occasional or intermittent discharge of chlorinated water through line breaks, wellhead treatment, system flushing and other sporadic activities. We were pleased to read in the June 2006 version that the SWRCB recognized "it is infeasible [at the present time] to use numeric effluent limits for TRC and CPO to regulate potable water discharges that occur in the field due to the activities of drinking water utilities or agencies" and that the policy will not apply to NPDES permit holders for which the SWRCB has determined effluent limits are not practicable.

Drinking water agencies are constantly utilizing and trying to improve Best Management Practices (BMP) and Best Available Technology (BAT) to minimize the amount of chlorinated water that is discharged into the waters of the State. ACWA drinking water members are

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required to ensure their chlorinated discharges do not negatively affect water quality and are committed to that purpose. We look forward to working with the SWRCB and Regional Boards as the Chlorine Policy is adopted and fully implemented to best serve the needs of our member agencies and statewide water quality. ACWA is also eager to actively address any remaining issues faced by our POTW members in the June 2006 draft of the Chlorine Policy.

Finally, we would like to recognize the efforts of Dena McCann and the staff at the State Board who worked with ACWA and other stakeholders from the inception of the proposed policy in fall 2005. The collaborative process in which each party handled stakeholder meetings, revisions and the June 19th public hearing is an excellent example of the success that can be achieved through cooperation and understanding.

If you have any questions regarding the comments presented in this letter, please contact Danielle Blacet, ACWA Regulatory Advocate at (916) 441-4545.

Sincerely,



Krista Clark
Director of Regulatory Affairs

KC:db