

**California Council for  
Environmental and  
Economic Balance**  
100 Spear Street, Suite 805 San Francisco, CA  
94105

July 14, 2006

Song Her, Clerk of the Board  
State Water Resources Control Board  
Executive Office  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



**RE: CCEEB's Additional Comments on Total Residual Chlorine and  
Chlorine-Produced Oxidants Policy and Revised Substitute  
Environmental Document**

Dear Members of the Board:

We have reviewed the revised proposed Total Residual Chlorine and Chlorine-Produced Oxidants Policy. We are generally in support of the revisions you have made and would like to thank the Board and staff for positive consideration of our earlier comments. CCEEB would like to make the following additional recommendations for your consideration.

Upon further review of the proposed Policy, CCEEB makes the following recommendations:

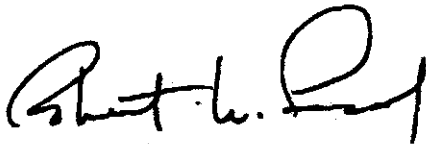
- Under *Policy Applicability*, CCEEB recommends that explicit language be added to this section that clearly states that NPDES permit holders that are granted permits exclusively pursuant to storm water discharge requirements be exempted from the proposed regulations. General Permit guidelines set forth in the Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities specifically regulate and account for and limit specific types of non-polluted non point and point source discharges of water. Waters that may contain TRC and CPO would be included. These discharges are incidental to industrial operations and do not contribute large quantities of TRC and CPO to waters affected by the proposed Policy.
- While requirements have been set forth in this body of proposed Policy for large volume discharges of water containing TRC and CPO, there is a potential for a secondary group of facilities that discharge much smaller

quantities of water that contain TRC and CPO to be collected into these requirements. In many cases simple discharges of potable water that contains TRC and CPO may be regulated even though the volume and frequency of discharges do not pose a risk to regulated waters when all factors are considered. While CCEEB appreciates and agrees that reduction of TRC and CPO from all sources is the objective, CCEEB would like to encourage the State Board to grant flexibility and authority to the Regional Boards as stated in the proposed Policy *Mixing Zones and Site Specific Objectives*. The relief may be granted by proposal from a specific site to a Regional Board or acceptance of de-minimus volume releases at the State Board level of potable water discharges, either based on volume per unit time or for either continuous or infrequent low volume discharges. Another recommendation is establishment of de-minimus volume per discharge event, and a limitation of discharge events, either on a weekly, monthly or annual basis.

- CCEEB agrees that Mixing Zones should be allowed on a case-by-case basis and that Regional Boards should consider and authorize discharges of TRC and CPO when mixing zone authorization is granted. In particular, this relief should be granted for certain facilities or discharges when those discharges originate exclusively from potable water sources.

CCEEB asks that you please consider making these additions to the final Policy. If you have any questions, please call at 444-7337.

Sincerely,



Robert W. Lucas

cc.: Vic Weisser, CCEEB  
John Grattan, CCEEB  
Jackson Gualco, CCEEB