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July 13, 2006

Tam Doduc, Chair
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, California 95814

C/o Song Her, Clerk to the Board
Via e-mail: commentletters@waterboards.ca.gov



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

Dear Chair Doduc:

We thank you for this additional opportunity to provide comments on the June 30, 2006 version of the "Draft Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California" (proposed policy). While we welcome the changes from the April version, we continue to have concerns over some aspects of the proposed policy.

In review of the responses to comments, our first concern is related to quantification/reporting requirements. The methods of continuous monitoring and Standard Method 4500-Cl E are not approved for testing chlorine in wastewater for NPDES compliance/reporting. In the SWRCB staff response to this subject concern, it was stated that "because EPA must approve the policy before it takes effect, EPA will have the opportunity to consider whether the methods suggested in the policy should be used to monitor compliance." We do not believe that EPA approval of this policy can substitute the method promulgation process and by default cause these methods to be approved for NPDES compliance monitoring.

Our next concern is related to the requirement that for continuous monitoring equipment, "Dischargers should also utilize manufacturer's recommendations regarding... calibration." The manufacturer's recommendation for calibration solutions are orders of magnitude above the objectives specified in the proposed policy, which requires quantification from extrapolation far outside calibration curves. We do not believe this is an acceptable practice for compliance determinations. The allowance of indirect chlorine residual measurement of dechlorination agent residual has similar issues all of which can be further complicated by the wastewater matrix.

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Although the proposed policy allows for compliance schedules up to 5 years for optimization of the performance of the analytical methods and equipment to meet the quantification/reporting objectives, we do not believe it is prudent that a policy should be adopted where a compliance schedule which presumes compliance will be technically achieved in 5 years is a judicious approach that we can support. We agree with the suggestion in the TriTAC, et alia, comment letter that the State Water Board defer adoption of this proposed policy to allow a stakeholder group to work with Board staff to develop a more technically sound and attainable policy. Thank you for your consideration of our comments.

Respectfully submitted,

San Bernardino Municipal Water Department

Valerie Housel
Director of Environmental and Regulatory Compliance

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