



June 5, 2006

Song Her, Clerk to the Board  
State Water Resources Control Board  
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Re: Summary Comments In Advance Of the State Water Resources Control Board (SWRCB) Public Hearing on the Proposed Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California

Dear Ms. Her:

Golden State Water Company (GSWC) would like to express our support of comments submitted by the Association of California Water Agencies. GSWC provides drinking water to more than one million people in 10 counties throughout California and is member of the Association of California Water Agencies (ACWA). As a drinking water provider, we have a vested interest in preserving the quality of our streams, lakes and underground aquifers. We are dedicated to providing our customers with water that meets strict State and Federal drinking water standards and chlorine is a critical tool used to meet those standards.

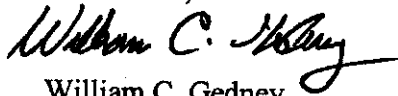
GSWC has been closely following the developments of the Total Residual Chlorine and Chlorine-Produced Oxidants Policy (TRC) and appreciate SWRCB staff time and effort to work with all stakeholders. At the September 2005 stakeholder meeting held with SWRCB staff and SWRCB board members, we were relieved to learn that both staff and board members agreed, that due to technology limitations, it was infeasible for potable water discharges to comply with the proposed effluent limits and that these type of discharges were already adequately regulated under other types of Municipal Separate Storm Sewer Permits and General Permits. Water utilities must periodically dewater pipelines and reservoirs, flush fire hydrants and backwash filters in order to comply with federal and state drinking water regulations. We discharge under several General Permits and are required to use Best Management Practices (BMPs) to dechlorinate all our discharges. These BMPs are very effective but there is no field monitoring equipment available to detect total residual chlorine down to the level proposed in the policy.

We understand that staff is still working on language to clearly reflect these technology limitations and to clearly demonstrate that it is not the intent of the policy to further regulate these discharges. We support their efforts to develop a policy that is technologically feasible, protective of natural resources and can be uniformly interpreted and implemented by the regional water boards.

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We support the recommendation to include explicit language in the Substitute Environmental Document and the TRC Policy that states the current technologic infeasibility and establishes a conditional authorization or other type of exclusion that allows authorized non-stormwater discharges to continue to be regulated under MS4 permits or General permits that require implementation of BMPs and/or Best Available Technology based effluent limits to reduce total residual chlorine to the maximum extent possible.

Thank You,



William C. Gedney  
Vice President of Water Quality