EAST BAY
MUNICIPAL UTILITY DISTRICT

May 1, 2008

Ms. Diana Messina
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, California 95670-6114

RE: Comments on the Tentative General Waste Discharge Requirements for Dewatering and Other Low Threat Discharges to Surface Waters, Order No. R5-2008-xxxx, NPDES No. CAG995001

Dear Ms. Messina:

The East Bay Municipal Utility District (District) appreciates the opportunity to provide comments on the subject Tentative General Waste Discharge Requirements (Tentative WDRs). The Tentative WDRs will replace General Order No. 5-00-175, under which the District currently has coverage for low threat discharges of backwash water from water treatment plants at Camanche North Shore Recreation Area, Camanche South Shore Recreation Area, Pardee Recreation Area, and Pardee Administration Center, located in Amador and Calaveras Counties. The Tentative WDRs will also cover planned releases of drinking water from District facilities in Amador and Calaveras Counties resulting from system operation and maintenance activities, such as flushing of fire hydrants and pipelines that may discharge into a drainage channel or to surface water.

The District uses high quality raw water sources from Pardee Reservoir, Camanche Reservoir, or groundwater for treatment by filtration and disinfection prior to distribution. Because treated water is used for backwashing the filtration system and is of higher quality than the source water, the backwash water quality meets criteria for classification under a categorical exemption for meeting priority pollutant criteria and objectives as authorized by Section 5.3 of the State Implementation Policy.

Under the existing General Order, the Monitoring and Reporting Program (MRP) requires total residual chlorine (TRC) to be less than 0.02 mg/L at the discharge point to a drainage channel. Under the Tentative WDRs, the TRC limit is 0.011 mg/L as a 4-day average and 0.019 mg/L as a 1-hour average. These limits appear to be consistent with the State Water Resources Control Board's *Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California*, (TRC/CPO) Draft, June 2006. Extensive comments and testimony were submitted from many public agencies and instrumentation manufacturers during the development of this draft policy regarding compliance these standards due to technical limitations of chlorine residual measurements.

The District supports the protection of beneficial uses and the State and Regional Board's objective of reducing TRC discharges to as close to zero as practicable. Additionally, the

District concurs with the draft policy to regulate potable water discharges through best management practices instead of numeric effluent limits, which are infeasible to regulate because potable water discharges may occur infrequently and at disperse locations in the field and field monitoring equipment does not currently achieve these effluent limits. We recommend that the Regional Board consider comments and testimony submitted during development of the draft TRC/CPO Policy concerning the limitations of available analytical methods, and re-evaluate the appropriateness and technical feasibility of the proposed numeric TRC effluent limits based on the following considerations:

- Analytical methods for measuring TRC in the field and laboratory cannot meet detection limits in the range of 0.011 mg/L to 0.019 mg/L for a typical drinking water matrix. In recognition of current analytical limitations, the San Francisco RWQCB Regional Board adopted a detection limit of 0.08 mg/L in its 2003 General Permit for surface water treatment facilities, as being practical and technically achievable. The Central Valley Regional Board should consider this limit in the Tentative WDRs and to be more consist with other Regional Boards statewide.
- 40 CFR Part 136 specifies Standard Method 4500-Cl for chlorine, with a method detection limit (MDL) of 0.010 mg/L. Appendix B of 40 CFR Part 136 provides the method for calculating the MDL under ideal laboratory conditions, when analysis is performed immediately upon collection or continuously monitored in-line. Many U.S. Environmental Protection Agency quality assurance guidance documents and other laboratory accreditation procedures allow the use of practical or quantitation reporting limits (RLs) that are two to ten times the MDL when allowing for analytical accuracy and precision. The District supports reporting the data qualifier "Detected, but Not Quantified" (DNQ) when concentrations are less than the RL, but greater than the MDL. Dischargers should be allowed to perform studies and validate laboratory specific MDLs and RLs. This indicates reliably measuring TRC in the field or in the laboratory between 0.011 mg/L and 0.019 mg/L is not practicable.
- Due to technical limitations in monitoring for TRC, it is recommended that monitoring for dechlorination agent residual concentrations be included in the Tentative WDRs as being an acceptable alternative to monitoring for TRC limits and general permit limits to reduce potential impacts to the Maximum Extent Practicable (MEP).

Thank you for your consideration. Should you have any questions or comments regarding these comments, please contact me at (510) 287-0345.

Sincerely,

Colin S. Moy for

John H. Schroeter, P.E.
Manager of Environmental Compliance