



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

Office of the General Manager



April 21, 2017

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resource Control Board  
P.O. Box 997377, MS 7400  
Sacramento, CA 95899-7377

Dear Ms. Townsend:

**Subject: 1,2,3-Trichloropropane Maximum Contaminant Level (SBDDW-17-001)**

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to comment on the State Water Resources Control Board's (State Water Board's) proposed maximum contaminant level (MCL) of 0.000005 mg/L (5 parts per trillion [ppt]) for 1,2,3-Trichloropropane (1,2,3-TCP). Metropolitan supports the proposed MCL and associated regulations for 1,2,3-TCP. Nevertheless, Metropolitan offers the following comments to help the regulated community comply with the proposed MCL.

### **Background**

Metropolitan is a regional water wholesaler that delivers approximately two million acre-feet per year to 26 member public agencies, who in turn provide water to nearly 19 million people in Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura counties. Metropolitan has not detected 1,2,3-TCP in any of its source or treated water supplies. However, several of Metropolitan's member agencies that rely on groundwater may be vulnerable to 1,2,3-TCP contamination based on historical industrial and agricultural practices. Of the top four counties in California with 1,2,3-TCP detections, two are in Metropolitan's service area (Los Angeles and San Bernardino).

### **Comments**

Metropolitan offers the following comments on the proposed MCL for the State Water Board's consideration:

1. A reasonable implementation schedule is needed to meet the MCL

Metropolitan recommends that the State Water Board amend the proposed rule to provide a specific, reasonable time period to enable public water systems to comply with the new 1,2,3-TCP MCL. The steps necessary to comply with the proposed 1,2,3-TCP regulation—designing appropriate treatment, securing funding, construction and start-up—could take a significant amount of time. While larger water utilities may have the ability to temporarily switch to an alternative water source

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to address 1,2,3-TCP contamination, smaller utilities often do not have access to alternative water sources, nor do they have the financial capacity to install new treatment. Therefore, smaller utilities, especially those in disadvantaged communities, may need more time to comply with the regulation. A reasonable implementation period will allow water systems time to adjust operations or install treatment without unduly incurring drinking water violations or eroding public confidence in drinking water.

This recommended implementation period concept is similar to one signed into law in 2014 to address California's chromium 6 drinking water standard. SB 385 (Hueso, D – San Diego) established a process for public water systems to work toward and achieve compliance with the chromium 6 MCL without being deemed in violation of the standard, as long as the necessary safeguards were met. As such, Metropolitan recommends that the implementation schedule for 1,2,3-TCP should not be less than three to five years.

2. Setting the MCL at the detection limit requires careful quality assurance and sample validation

The proposed 1,2,3-TCP MCL is set at the detection limit for the purpose of reporting (DLR) of 5 ppt. While this is not unique among regulated contaminants, the extremely low detection threshold for 1,2,3-TCP will certainly pose challenges in complying with the regulation. False-positive or false-negative samples may arise if adequate quality assurance and quality control are not implemented. As such, Metropolitan recommends that the State Water Board direct the Environmental Laboratory Accreditation Program (ELAP) to establish standard procedures regarding the use of field blanks, provisions to investigate positive results at levels at or near the DLR, and resampling when appropriate. These standard procedures will help laboratories maintain proper quality assurance/quality control and ensure compliance determinations are made with valid sample results.

**Summary**

Thank you again for the opportunity to comment on the proposed MCL for 1,2,3-TCP. Metropolitan commends the efforts by State Water Board staff in developing its 1,2,3-TCP regulation. Metropolitan asks that the State Water Board consider these comments prior to finalizing the 1,2,3-TCP drinking water standard. If you have any questions or need addition information, please contact me at [mstewart@mwdh2o.com](mailto:mstewart@mwdh2o.com) or (213) 217-5696.

Very truly yours,



Mic Stewart, Ph.D.  
Manager, Water Quality Section