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December 22 2016

**4-19-17** SWRCB Clerk

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Having recently spent one month in Viet nam, I know of the horrors that can arise from negligent treatment of our natural environment. During the Viet nam War (known as the American war by all Vietnamese), Dow was the major producer of Agent Orange, a compound that was used in a ten year offense on the Viet Cong where planes would spray the dense forestry in an effort to hinder the V.C.'s guerilla warfare tactics. While the mission was a huge failure, the effects of Agent Orange lived on. It is the reason for why 10% of Viet nam's population is disabled, and why the amount of arable land in the Vietnamese ecosystem is still abysmal.

Fifty years after the Viet nam war, Dow still has not admitted to its mistakes (the company assured the US Army that Agent Orange had no long term effects). Any rational person would be petrified to learn that the health of our drinking water is in the hands of Dow and Shell.

Adopting smarter practices now will save our posterity much more time and sorrow than we think. Look to the future!

Alexander Gouyet 931 Guinda Street Palo Alto, CA 94301





# California Rural Legal Assistance Foundation

Amagda Pérez, Esq. Executive Director

Mark S. Schacht Deputy Director

Jennifer Cesario Development Director

**BOARD OF DIRECTORS** Rosa Armendariz

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--Sustainable Rural Communities

April 18, 2017

Felicia Marcus, Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0100

Re: 1,2,3-Trichloropropane MCL

VIA Email: SBDDW-17-001 commentletters@waterboards.ca.gov

Dear Chair Marcus and Board Members Doduc, Moore, and D'Adamo:

On behalf of the California Rural Legal Assistance Foundation we urge the State Water Resources Control Board to adopt the Division of Drinking Water's proposed **5 part per trillion** (ppt) maximum contaminant level ("MCL") for 1,2,3-trichloropropane ("TCP") with all expediency. TCP is a synthetic chemical that puts the health of Californians in at least 16 counties served by almost 100 water systems at risk.<sup>1</sup> At least half of the affected water systems are in Fresno, Tulare and Kern counties where we have been working for years to improve access of rural communities to clean water, reliable infrastructure and adequate health care.

#### 1,2,3-TCP is a known human carcinogen

Since 1992, California has recognized TCP as a chemical "known to the State to cause cancer" under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65, 1992).<sup>2</sup> Concluding that "1,2,3-TCP represents a significant carcinogenic risk when it occurs in drinking water," the California Office of Environmental Health Hazard Assessment ("OEHHA") issued a Public Health Goal (PHG) for TCP in drinking water of 0.7 ppt in 2009.<sup>3</sup> According to the State Water Board's Standardized Regulatory Impact Assessment, "[e]xposure to concentrations of 1,2,3-TCP in drinking water that exceed the PHG will result in an increased risk

MAIN OFFICE 2210 "K" Street, Suite 201 Sacramento, California 95816 (916) 446-7904 Fax: 446-3057



http://www.waterboards.ca.gov/drinking\_water/certlic/drinkingwater/123TCP.shtm l.

<sup>&</sup>lt;sup>2</sup> <u>https://oehha.ca.gov/media/downloads/proposition-65//p65single01272017.pdf</u>, pg. 21.

<sup>&</sup>lt;sup>3</sup> https://oehha.ca.gov/water/public-health-goal/final-public-health-goal-123trichloropropane-drinking-water

for cancer."<sup>4</sup> To protect Californians from an increase in lifetime cancer risk due to TCP in water, the State Water Board should adopt an MCL **no greater than 5 ppt**, which is the detection limit for reporting purposes ("DLR") and therefore currently the technologically feasible exposure limit.

#### Disproportionate impacts in low income rural communities of the central valley

The documented source of most of the TCP pollution of California's groundwater is an avoidable impurity in soil fumigants manufactured by Shell Oil Company and Dow Chemical Company and used extensively in California from the 1950s through the 1980s. Shell and Dow neglected to disclose to farmers that TCP was a contaminant in their products or the harm it posed to human health.

More than half of the state's contaminated wells are found in the agriculturally rich San Joaquin Valley, particularly in small, poor, rural communities in Kern, Fresno, and Tulare Counties.<sup>5</sup> TCP is one of a number of pollutants impacting water supplies in these rural, lower-income communities where health and wellbeing of residents is also threatened by disproportionate exposure to air pollution, soil contamination and basic infrastructure deficiencies and lack the adequate resources to address these problems or the associated health problems.

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#### The 5 ppt recommendation is appropriate and defensible

Health & Safety Code §116365(a) requires the State Water Board to establish a contaminant MCL as close to its PHG as is technologically and economically feasible, placing primary emphasis on the protection of public health. An MCL of 5 ppt is currently the technically feasible limit because it is TCP's detection limit for reporting or DLR.

Because TCP is a synthetic, manufactured chemical that does not occur naturally, viable responsible parties have been identified, and affected water suppliers have available legal remedies to recoup water treatment costs. In fact, setting the MCL at 5 ppt would expedite cost-recovery efforts that have been pending for years, while providing strong health protection and limiting current and future medical costs. Choosing to allow greater cancer risk because of waer treatment costs would benefit only the parties responsible for the contamination.

#### Adopt a health-protective MCL as soon as possible

The SWRCB's Standardized Regulatory Impact Assessment said, "Based on the inability to obtain alternative sources of drinking water, disadvantaged communities would continue to use and consume drinking water containing high levels of 1,2,3-TCP. In

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http://www.dof.ca.gov/Forecasting/Economics/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Major\_Regulations/Majo

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<sup>&</sup>lt;sup>5</sup> The exception to this is Los Angeles County, which is the second most affected in the state.

disadvantaged or severely disadvantaged communities, the incidence of cancer cases over a lifetime would be greater as compared to other impacted communities. Therefore, the proposed regulation would offer the most health benefit to these types of communities." Given that the state has recognized the dangers of TCP since 1992, it is critical to expedite water supply treatment so as to minimize and mitigate the harm to people who depend on water supplies contaminated with TCP. Consequently, the adoption of a 5 ppt MCL should not be delayed any further.

Thank you for your consideration.

Sincerely,

amer Matte

Anne Katten, MPH CRLAF Pesticide and Work Safety Project Director <u>akatten@crlaf.org</u>

Noe Paramo CRLAF Sustainable Rural Communities Project nparamo@crlaf.org



January 7, 2017

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

#### Re: 1,2,3-Trichloropropane Maximum Contaminant Level

Dear Ms. Marcus, Ms. Spivy-Weber, Ms. Doduc, Mr. Moore, and Ms. D'Adamo:

I live in the San Joaquin Valley, where the economy is supported primarily by agriculture. I recently learned that detections of the unregulated carcinogenic pesticide byproduct 1,2,3-trichloropropane (1,2,3-TCP) have been found in several wells in my area, and that I may be drinking 1,2,3-TCP contaminated water.

1,2,3-TCP is a toxic chemical contaminating groundwater all over California, but it is disproportionately found in the San Joaquin Valley. In 1999, TCP was added to the list of chemicals known to the State of California to cause cancer, however, to this day, it remains unregulated and therefore untreated in hundreds of systems across the state.

I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant level ("MCL") of 5 parts per trillion.

Sincerely,

Name

Signature resnd (A 93706

Address

59. 273,4914

Phone Number

ECEIVE 4-19-17 SWRCB Clerk

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January 7, 2017

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

# Re: Meta del Nivel Máximo del Contaminante de 1,2,3-Trichloropropane

Estimados Sra. Marcus, Sra. Spivy-Weber, Sra. Doduc, Sr. Moore, and Sra. D'Adamo:

Yo vivo en el Valle de San Joaquín, donde la economía se apoya principalmente por la agricultura. Hace poco me enteré de detecciones de 1,2,3-tricloropropano (1,2,3 - TCP), en varios pozos de mi área. Este contaminante es un subproducto de pesticidas que causa cáncer y que no es regulado por el estado, y que puedo estar bebiendo agua contaminada con este contaminante.

1,2,3 - TCP es un producto químico tóxico contaminando en las aguas subterráneas en todo el estado de California, pero se encuentra en forma desproporcionadamente en el Valle de San Joaquín. En 1999, el TCP se añadió a la lista de sustancias químicas como causantes de cáncer por el estado de California, sin embargo, hoy día, sigue siendo no regulado y por lo tanto sin tratamiento en cientos de sistemas comunitarios de agua en todo el estado.

Por estas razones, Yo le urjo a la Mesa de Control de Recursos Hídricos del Estado (SWRCB, por sus siglas en ingles) que rápidamente para adoptar el nivel máximo de contaminante (MCL, por sus siglas en ingles) que proteja la salud de 5 partes por trillón.

Sinceramente,
\_\_\_\_\_\_\_Nombre Firma
\_\_\_\_\_\_\_
Domicilio



April 19, 2017

Felicia Marcus, Chair State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0100

#### Re: 1,2,3 -Trichloropropane MCL – Support 5 ppt

Dear Chair Marcus and Board Members Doduc, Moore, D'Adamo, and Esquivel:

The undersigned organizations, on behalf of the hundreds of thousands of Californians we represent, urge the State Water Resources Control Board to adopt the Division of Drinking Water's proposed **5 parts per trillion** (ppt) maximum contaminant level ("MCL") for 1,2,3-trichloropropane ("TCP") with all expediency. TCP is a solely man-made chemical that puts the health of Californians in at least 16 counties served by almost 100 water systems at risk.1

#### 1,2,3-TCP is a known human carcinogen

Since 1992, California has recognized TCP as a chemical "known to the State to cause cancer" under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65, 1992).<sup>2</sup> Concluding that "1,2,3-TCP represents a significant carcinogenic risk when it occurs in drinking water," the California Office of Environmental Health Hazard Assessment ("OEHHA") issued a Public Health Goal (PHG) for TCP in drinking water of 0.7 ppt in 2009.<sup>3</sup> According to the State Water Board's Standardized Regulatory Impact Assessment, "[e]xposure to concentrations of 1,2,3-TCP in drinking water that exceed the PHG will result in an increased risk for cancer."<sup>4</sup> To protect Californians from an increase in lifetime cancer risk due to TCP in water, the State Water Board should adopt an MCL **no greater than 5 ppt**, which is the detection limit for reporting purposes ("DLR").

#### Disproportionate impacts in agricultural regions

Although small quantities of TCP have reportedly been used for industrial purposes, most of the TCP pollution of California's groundwater is the result of its presence as an unnecessary

<sup>1</sup> http://www.waterboards.ca.gov/drinking\_water/certlic/drinkingwater/123TCP.shtml.

<sup>2</sup> https://oehha.ca.gov/media/downloads/proposition-65//p65single01272017.pdf, pg. 21.

<sup>3</sup> https://oehha.ca.gov/water/public-health-goal/final-public-health-goal-123-trichloropropane-drinking-water

<sup>4 &</sup>lt;u>http://www.dof.ca.gov/Forecasting/Economics/Major Regulations/Major Regulations Table/documents/</u> Final SRIA\_10062016.pdf

impurity in soil fumigants manufactured by Shell Oil Company and Dow Chemical Company. These fumigants were used extensively in California from the 1950s through the 1980s. Shell and Dow neglected to disclose to farmers that TCP was a contaminant in their products or the harm it posed to human health.

TCP has been detected all over California, but more than half of the state's contaminated wells are found in the agriculturally rich San Joaquin Valley, particularly in Kern, Fresno, and Tulare Counties.<sup>5</sup> TCP is not the only pollutant affecting water supplies in these rural, lower-income regions where residents are already threatened by disproportionate exposure to contaminated water and other pollution, and often lack the adequate resources to address these problems or the associated medical consequences.

#### Costs to water systems and the public should NOT change the 5 ppt recommendation

Health & Safety Code §116365(a) requires the State Water Board to establish a contaminant MCL as close to its PHG as is technologically and economically feasible, placing primary emphasis on the protection of public health. Given TCP's DLR, it is not technically feasible to set the MCL lower than 5 ppt. The only other factor the Board is permitted to consider is cost.

Because TCP is synthetic, manufactured chemical that does not occur naturally, viable responsible parties have been identified, and affected water suppliers have available legal remedies to recoup water treatment costs, choosing to allow greater cancer risk because of the economic factors benefits only the responsible parties. In fact, setting the MCL at 5 ppt would expedite cost-recovery efforts that have been pending for years, while providing strong health protection and limiting medical costs. Furthermore, the state's office of sustainable water solutions and complementary TA program is perfectly situated to ensure that small communities share in the benefits of drinking water free of this harmful carcinogen.

#### Adopt a health-protective MCL as soon as possible

The SWRCB's Standardized Regulatory Impact Assessment said, "Based on the inability to obtain alternative sources of drinking water, disadvantaged communities would continue to use and consume drinking water containing high levels of 1,2,3-TCP. In disadvantaged or severely disadvantaged communities, the incidence of cancer cases over a lifetime would be greater as compared to other impacted communities. Therefore, the proposed regulation would offer the most health benefit to these types of communities." Given that the state has recognized the dangers of TCP since 1992, it is critical to expedite water supply treatment so as to minimize and mitigate the harm to people who depend on water supplies contaminated with TCP. Consequently, the adoption of a 5 ppt MCL should not be delayed any further.

<sup>5</sup> The exception to this is Los Angeles County, which is the second most effected in the state.

Thank you for your consideration.

Sincerely,

Asha Kreiling Policy & Communications Analyst Community Water Center

Andria Ventura Toxics Program Manager Clean Water Action

Jose Gurrola Mayor City of Arvin

Bill Allayaud California Director of Government Affairs Environmental Working Group

Rachel Doughty President Greenfire Law

Kyle Jones Policy Advocate Sierra Club

Susan JunFish, MPH Executive Director Parents for a Safer Environment

Colin Bailey Executive Director & Managing Attorney The Environmental Justice Coalition for Water

Nayamin Martinez, MPH Director Central California Environmental Justice Network (CCEJN)

Jason Pfeifle Public Health Advocate CalPIRG Asociación de Gente Unida por el Agua (Association of People United for Water)

Caroline Farrell, Executive Director Center for Race, Poverty, and the Environment

Paul Towers Organizing Director & Policy Advocate Pesticide Action Network

Caty Wagner & Sal Cazarez Co-founders Progressives United for Social Justice and Human Rights (PUSH)

Irma Medellin Executive Director El Quinto Sol de America

Horacio Amezquita General Manager San Jerardo Cooperative, Inc

Adam Scow California Program Director Food and Water Watch

Phoebe Seaton Co-Director and Attorney at Law Leadership Counsel for Justice and Accountability

Cassie Burdyshaw Advocacy & Policy Director Turtle Island Restoration Network

Leah Campbell Policy Analyst California Coastkeeper Alliance Kathryn Alcantar California Policy Director Center for Environmental Health

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Sarah Aird, Esq. Co-Director Californians for Pesticide Reform

Helen Hutchison President League of Women Voters of California

Kevin Hamilton Chief of Programs Central California Asthma Collaborative

Kevin Hamilton Medical Advocates for Healthy Air (MAHA)

Lisa Archer Director, Food and Technology Program Friends of the Earth U.S.

Patty Clary Executive Director Californians for Alternatives to Toxics

Eduardo Guevara Executive Director Promotores Comunitarios del Desierto

Lauren Ornelas Founder/Executive Director Food Empowerment Project

Dave Henson Executive Director Occidental Arts & Ecology Center

Belita Cowan President Lymphoma Foundation of America

Patty Pagaling Executive Director Transition to Organics Renee Nelson President Clean Water and Air Matter

Judi Shils Executive Director Turning Green

Myra Duran Senior Policy Manager California Latinas for Reproductive Justice

Katie Huffling, RN, MS, CNM Executive Director Alliance of Nurses for Healthy Environments

Lisa Arkin Executive Director Beyond Toxics

Pamela Miller Executive Director Alaska Community Action on Toxics

Mitzi Shpak Executive Director Action Now

Kimberly Baker Executive Director Klamath Forest Alliance

Thomas Wheeler Executive Director Environmental Protection Information Center (EPIC)

Caitlin Alesio Maloney Director of Campaign Operations and Technology Courage Campaign

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Dr. Elizabeth Dougherty Director Wholly H20

Lori de León Business Manager Dolores Huerta Foundation

Gavin Raders Executive Director Planting Justice

Jonathan Evans Environmental Health Legal Director and Senior Attorney Center for Biological Diversity

Pamm Larry Director GMO Free California

Robert M. Gould, M.D., President San Francisco Bay Area Physicians for Social Responsibility

Lucia Calderón Organizer Safe Ag Safe Schools

Cesar Lara Executive Director Monterey Bay Central Labor Council

Martha Dina Argũello Executive Director Physicians for Social Responsibility-Los Angeles

Morgan Patton Executive Director Environmental Action Committee of West Marin

Amy Vanderwarker Co-director California Environmental Justice Alliance





**Del Rey** "Where Raisin is King"

April 21, 2017

State Water Resources Control Board c/o Ms. Jeanine Townsend Clerk of the Board P.O. Box 997377, MS 7400 Sacramento, CA 95899-7377

R	ECEIVED
	4-21-17
	SWRCB Clerk

# Re: SBDDW-17-001; Proposed 1,2,3-Trichloropropane MCL Regulation;

Dear Members of the State Water Resources Control Board:

On April 18, 2017, the Del Rey Community Services District, along with nine other similarly situated Central Valley water systems struggling with 1,2,3-trichloropropane (1,2,3-TCP) well water contamination, submitted a public comment letter in support of the State Water Resource Control Board's proposed 1,2,3-TCP maximum contaminant level (MCL) regulation. I also spoke on behalf of my District at the public hearing on the proposed MCL on April 19. I am now writing this brief supplemental comment letter on behalf of my District and its elected Board of Directors in order to address a comment made at the hearing by a representative of the organization California Rural Legal Assistance (CRLA).

In its comments, CRLA was critical of the "grandfathering" provision in the proposed regulation that would allow public water systems to substitute certain voluntary early monitoring results during the initial compliance monitoring period, and urged the Board to eliminate this provision. To our knowledge, CRLA is the only commenter among the many stakeholders who have weighed in regarding the proposed MCL that opposes the grandfathering provision.

Del Rey C.S.D. supports the proposed grandfathering provision. It is narrowly tailored and appropriately protective of both public health and people's interest in receiving full disclosure about contaminant levels in their water. Indeed, the stated purpose of the provision is to encourage early monitoring, and therefore early efforts to plan for remediation, which is good for public health and communities. Del Rey C.S.D. has been voluntarily monitoring for 1,2,3-TCP in its wells since 2012. With the knowledge generated by that effort, we were able to commission an independent feasibility study of treatment options and costs. As a result, we now have a blueprint for achieving MCL compliance once funding can be secured, before the MCL is even adopted. Whether or not Del Rey C.S.D. ultimately chooses to utilize the grandfathering option, we think our experience shows that having a provision in place to incentivize early monitoring is the right policy.

Mailing Address: P.O. Box 186, 10649 E. Morro Avenue, Del Rey, CA 93616 Phone: (559)888-2272 Fax: (559)888-1010 In criticizing the grandfathering provision, CRLA represented that it "works directly with residents" of Del Rey, and may have created the impression that it speaks for people in Del Rey. All members of the public, of course, have a right to submit comment on a proposed regulation. However, as the water system serving Del Rey, our District feels that it is important to emphasize that CRLA does not speak for Del Rey. To our knowledge, no CRLA attorney lives in Del Rey, and no resident of Del Rey has retained CRLA to represent them. In fact, when CRLA came into town last year and offered to help residents form a community organization related to the 1,2,3-TCP issue, residents declined, saying they would prefer to attend District board meetings and address their questions and concerns regarding water issues directly to the District.

Communities in the Central Valley affected by 1,2,3-TCP, like Del Rey, have a strong interest in seeing the MCL adopted as soon as possible. We sincerely hope that CRLA's isolated and misguided criticism of the grandfathering provision in the proposed regulation will not cause a slowdown in the regulatory process.

Please direct any correspondence related to this comment letter to the undersigned at the following address:

Carlos Arias District Manager Del Rey Community Services District 10649 E. Morro Drive Del Rey, CA 93616

Respectfully. Carlos Arias

District Manager Del Rey Community Services District B

NEW YORK LONDON SINGAPORE PHILADELPHIA CHICAGO WASHINGTON, DC SAN FRANCISCO SILICON VALLEY SAN DIEGO SHANGHAI BOSTON HOUSTON LOS ANGELES HANOI HO CHI MINH CITY

April 4, 2017

VIA E-MAIL

Jeanine Townsend Clerk to the State Water Resources Control Board State Water Resources Control Board 1001 I St., 24th Floor Sacramento, CA 95814 commentletters@waterboards.ca.gov

## Re: City of Bakersfield's Comments on Proposed 1, 2, 3 – Trichloropropane Regulations and Associated Draft Initial Study/Mitigated Negative Declaration

Dear Ms. Townsend:

We are special water counsel to the City of Bakersfield ("Bakersfield" or "City"). On behalf of Bakersfield, we submit the following comments on the proposed 1, 2, 3 – Trichloropropane ("TCP") regulations and associated Draft Initial Study/Mitigated Negative Declaration, which the State Water Resources Control Board ("Water Board") will consider adopting in the summer of 2017.

Bakersfield appreciates the efforts of the Water Board to adopt a primary drinking water standard for the protection of public health with regard to TCP. Bakersfield also understands that the Water Board has set an adopted Maximum Contaminant Level (MCL) as close to the contaminant's public health goal (PHG) as is technologically and economically feasible at the time of adoption, while placing primary emphasis on protection of public health.

A significant number of wells within Bakersfield (approximately 40) are currently impacted by TCP. Bakersfield staff are working diligently with consultants to construct and install treatment systems on its impacted wells to ensure that it is in compliance with the proposed TCP regulations, and to protect the health of City residents.

DUANE MORRIS LLP

FIRM and AFFILIATE OFFICES

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COLIN L. PEARCE DIRECT DIAL: +1 415 957 3015 PERSONAL FAX: +1 415 704 3098 *E-MAIL:* clpearce@duanemorris.com

www.duanemorris.com





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Public Comment

PHONE: +1 415 957 3000 FAX: +1 415 957 3001

# <u>DuaneMorris</u>

Jeanine Townsend April 4, 2017 Page 2

Given the number of impacted wells within the City, and the time, cost and efforts involved in the development and installation of treatment systems on individual wells, Bakersfield respectfully requests that the Water Board provide additional time to come into compliance with the new regulations. Bakersfield's request for additional time is necessary because of the number of significant capital improvement projects it will be required to undertake in order to install treatment systems on its TCP impacted wells to be in compliance with the proposed MCL.

Bakersfield notes that The California Safe Drinking Water Act provides for a public water system to seek an exemption from any MCL or treatment requirement from the Water Board provided that it satisfy certain requirements. (Health and Safety Code § 116425(a).) With the granting of an exemption, the Board may set out a schedule for interim measures and compliance that will require compliance to be achieved within 12 months of the granting of the exemption. (Health and Safety Code §§ 116425(b) and (c).)

Bakersfield notes that for hexavalent chromium, the Water Board granted, pursuant to Section 116431, a longer period of time to achieve compliance with the primary drinking water standard in connection with and based on an approved compliance plan. (See Health and Safety Code § 116431.)

Bakersfield could also present additional information in a compliance plan as to why compliance may not presently be feasible under the proposed timetable, as well as options to achieve and maintain compliance by the earliest feasible date and the actions that Bakersfield is taking and will take to achieve compliance. While implementing the approved compliance plan or while a compliance plan is pending approval, Bakersfield would request that it not be deemed in violation of the primary drinking water standard for TCP.

Thank you for the opportunity to provide these comments to the proposed TCP regulations and associated Draft Initial Study/Mitigated Negative Declaration for the Water Board's consideration. Please let us know if you have any questions or require any further information on these matters.

Sinderely. nd Pearce a

Colin L. Pearce

cc: Alan Tandy, City Manager, City of Bakersfield Virginia Gennaro, City Attorney, City of Bakersfield Art Chianello, Water Resources Manager, City of Bakersfield  $\sum$ 

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Public Comment 1,2,3- TCP Deadline: 4/21/17 by 5pm

*Daniel Del Grande* 806 Mandana Boulevard Oakland, California 94610

ECEIVE 4-19-17 SWRCB Clerk

February 8, 2017

State Water Resources Control Board 1001 I Street Sacramento, CA 95812

Subject: 1,2,3TCP

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates over 300 known California drinking water sources, largely in rural communities where faulty pesticides were sold. TCP has been used as an industrial solvent and as a cleaning and degreasing agent; it has been found as an impurity resulting from the production of soil fumigants (DHHS 2011; HSDB 2009). The CDPH has established a notification level of 0.005  $\mu$ g/L for drinking water based on a 1 in 10-6 lifetime excess cancer risk and has set a final public health goal of 0.0007  $\mu$ g/L (CDPH 2010, 2013)

Treatment technologies for groundwater that are available for remediation of chlorinated hydrocarbons include pump and treat, permeable reactive barriers, in situ chemical oxidation and bioremediation (reductive dechlorination) (Cal/EPA 2009). I was a project engineer that developed one of the first in situ commercial applications of an iron reactive barrier at a G.E. facility on Hammerwood Avenue in Sunnyvale, CA in February 1985.

I'm writing to ask that you set the TCP drinking water standard at 5 ppt (the detection limit) to protect the public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely yours,

- 120 C.L

Daniel Del Grande Cell 510-812-5996



ECEIVE





Representing Over Fifty Wastewater Agencies

TERRIE MITCHELL – Chair, Sacramento Regional CSD TERESA TANAKA – Secretary, Calaveras County WD

CASEY WICHERT – Vice Chair, City of Brentwood ROBERT GRANBERG – Treasurer, City of Stockton

April 21, 2017

Via Electronic Mail Only

Jeanine Townsend Clerk to the Board State Water Resources Control Board Division of Drinking Water 1001 I Street Sacramento, California 95814 commentletters@waterboards.ca.gov

# SUBJECT: 1,2,3-Trichloropropane Maximum Contaminant Level

Dear Ms. Townsend:

The Central Valley Clean Water Association (CVCWA) appreciates this opportunity to provide comments on the Proposed Rulemaking for 1,2,3-Trichloropropane Maximum Contaminant Level. CVWA is a nonprofit association of Publicly Owned Treatment Works (POTWs) throughout the Central Valley of California whose primary mission is to represent wastewater agencies in regulatory matters while balancing environmental and economic interests. CVCWA members have a strong commitment to the protection of municipal and domestic beneficial uses in Central Valley waters. The Proposed Rulemaking will inadvertently impact POTWs because maximum contaminant levels (MCLs), once adopted, become water quality objectives per incorporation by reference language in the Central Valley Water Quality Control Plans. Accordingly, it is imperative that the Division of Drinking Water consider such impacts when it adopts MCLs. CVCWA provides the following comments on the Proposed Rulemaking because of this impact.

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#### I. Adoption of New MCLs Must Comply with Water Code Section 13241

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) has two adopted Water Quality Control Plans for its region (Sacramento-San Joaquin River Basins and Tulare Lake Basin) (collectively referred to as "Basin Plans"). Both Basin Plans include the following water quality objective for chemical constituents.

> At a minimum, water designated for use as domestic or municipal supply (MUN) shall not contain concentrations of chemical constituents in excess of the maximum contaminant levels (MCLs) specified in the following provisions of Title 22 of the California Code of Regulations, which are incorporated by reference into this plan: ..., Table 64444-A (Organic Chemicals) of Section 64444, .... This incorporation-by-reference is prospective, including future changes to the incorporated provisions as the changes take effect.

(See, e.g., Water Quality Control Plan for the Sacramento River Basin and San Joaquin River Basin (July 26, 2013), pages III-3.00 and III-10.00, emphasis added.) The prospective "incorporation-by-reference" language means that any time the Division of Drinking Water adopts a new MCL, it automatically becomes a water quality objective applicable to all receiving waters with the municipal beneficial use (MUN) designation. This includes both surface and ground waters.

The California Water Code requires regional water quality control boards, when adopting water quality objectives, to ensure reasonable protection of beneficial uses, and requires consideration of the following factors:

- (a) Past, present, and probable future beneficial uses of water.
- (b) Environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto.
- (c) Water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area.
- (d) Economic considerations.
- (e) The need for developing housing within the region.
- (f) The need to develop and use recycled water.

(Wat. Code, section 13241.)

Because adoption of the MCL will become a water quality objective, the Division of Drinking Water shall consider the factors as specified in Water Code section 13241. Review of the Proposed Regulation indicates that no analysis per Water Code section 13241 has been conducted.

# II. Proposed Rulemaking Needs to Consider Economic Impact to POTWs and Others

Second, the Proposed Rulemaking needs to be revised to specifically consider the impact that adoption of the new MCL will have on POTWs and others that are then mandated to comply with the MCL as a water quality objective. Once adopted, the MCL for 1,2,3-TCP becomes a water quality objective, which is a limit or level of a water quality constituent for the protection of beneficial uses and for the prevention of nuisance. (Wat. Code, §13050(h).) This means that discharges subject to waste discharge requirements under the Porter-Cologne Water Quality Control Act and discharges subject to National Pollutant Discharge Elimination System Permits under the Clean Water Act (*i.e.*, Central Valley POTWs and others) will be required show that their discharges will not cause or contribute to a violation of this standard. If a discharge does, then a POTW may be required to provide some form of treatment to remove the constituent from its effluent. This may be required even if the discharge in question would not impact an MUN water supply for a public water system.

Attachment A to the Proposed Regulation claims that the regulation only directly impacts public water systems that are not considered businesses or individuals. This statement is false because the Proposed Regulation may actually impact many entities beyond public water systems when the 1,2,3-TCP MCL is applied as a water quality objective. These impacts need to be considered as part of the Proposed Regulation. Moreover, the cost estimates are greatly underestimated, as they do not consider treatment or source control costs to POTWs and others that may result from 1,2,3-TCP being a water quality objective.

# III. Statement of Results of the Standardized Regulatory Impact Assessment Is Flawed as It Fails to Consider Impacts to Dischargers

Similar to the comments in Section II above, the analysis conducted by the Division of Drinking water to comply with Government Code section 11346.3(c) is flawed, as it fails to consider or recognize the impacts to dischargers. The Statement of Results of the Standardized Regulatory Impact Assessment needs to be revised in its entirety to consider the impacts that the adoption of the MCL may have on POTWs and other discharges, and costs that dischargers may be required to bear to meet the MCL in effluent and in receiving waters.

#### IV. Conclusion

The Division of Drinking Water needs to recognize that adoption of MCLs impact more than just public water systems. As the Division of Drinking Water considers adoption of the MCL for 1,2,3-TCP and any other constituent, it needs to consider the factors in Section 13241 of the Water Code, and to include impacts to dischargers in its fiscal and regulatory impacts analysis. Otherwise the Proposed Rulemaking is flawed and likely greatly underestimates the total cost of the regulation on all types of ratepayers and businesses. Thus, CVCWA recommends that the Proposed Rulemaking be substantially revised to address the concerns stated in these comments.

We appreciate your consideration of these comments. If you have any questions or if CVCWA can be of further assistance, please contact me at (530) 268-1338 or <u>eofficer@cvcwa.org</u>.

Sincerely,

Dewie Webster

Debbie Webster, Executive Officer

cc: Darrin Polhemus



Dieter Jundt

ECEIVE

4-19-17 SWRCB Clerk

State Water Resources Control Board

# March 13, 2017

#### Dear Members of the Board,

I am writing to you to voice my support for legislating drinking water standards. The recent debacle in Flint has made us aware that local quality control not always protects the people that drink the water on a daily basis.

1,2,3 TCP is a particular concern as much of California ground water is tainted with this carcinogen. Much of that has to do with pesticides that made their way into the ground water supply. By strengthening the ground water standards, we can put pressure on communities to pay attention to sources of contamination.

Please set the TCP drinking water standard to a feasible level, e.g. at the 5ppt detection limit, to protect public health and allow water systems to recoup treatment costs from known polluters.

Sincerely,

3164 Manchester Ct, Palo Alto, CA 94303





A L L F D R N L A MANUFACTURERS & TECHNOLOGY



April 20, 2017

Ms. Jeanine Townsend Clerk of the Board State Water Resources Control Board 1001 I Street, 24<sup>th</sup> Floor, Sacramento, CA 95814

Via Email and personal delivery: commentletters@waterboards.ca.gov

Re: Public Comments on Proposed Maximum Contaminant Level (MCL) for 1, 2, 3 Trichloropropane (TCP)-"SBDDW-17-001"

Dear Ms. Townsend:

The California Manufacturers & Technology Association (CMTA) and the American Chemistry Council (ACC) have asked Dr. Richard Belzer to prepare the attached comments on the State Water Resources Control Board (SWRCB) proposal to adopt an MCL for TCP in drinking water. CMTA and ACC ask that the Board consider these comments before proceeding with action on the proposed MCL for TCP.

For further communications relevant to these comments please contact the undersigned.

Sincerely,

Dorothy Rothrock, President California Manufacturers & Technology Association (916) 498-3319 <u>drothrock@cmta.net</u> 1115 Eleventh Street Sacramento, CA 95814

Mary T. Ostinvish.

Mary Ostrowski, Sr. Director, Chlorine Issues American Chemistry Council (202) 249-6705 <u>mary ostrowski@americanchemistry.com</u> 700 2<sup>nd</sup> Street, NE Washington, DC 20002 Independent Review of California State Water Quality Control Board Regulatory Impact Analysis for the Proposed 1,2,3-Trichloropropane Primary Drinking Water Standard

> Richard B. Belzer, Ph.D. P. O. Box 319 Mount Vernon VA 22121 <u>rbbelzer@post.harvard.edu</u> (703) 780-1850

#### **Richard B. Belzer**

Dr. Richard Belzer has been an independent consultant in regulation, risk, economics and information quality since 2001. Previously he was a visiting professor of public policy at Washington University in St. Louis and staff economist in the Office of Information and Regulatory Affairs at the Office of Management and Budget (OMB). He received his Ph.D. in public policy from Harvard University (1989), Master's in Public Policy (MPP) from the John F. Kennedy School of Government (now Harvard Kennedy School) (1982), and M.S. and B.S. degrees in agricultural economics from the University of California at Davis (1979, 1980).

Dr. Belzer's research and consulting work is highly multidisciplinary. He often collaborates with biologists, toxicologists, epidemiologists, and other professionals to solve problems that cross disciplinary boundaries. Current original research includes the evaluation of biomedical test procedures as inputs to human health risk assessment and benefit-cost analysis; the identification and use of objective indicators to identify adverse human health effects; the critical review of carcinogen classification schemes; the objective incorporation of human health risk assessments into benefit-cost analysis; and the analysis of environmental justice ranking schemes. He recently completed an analysis of potential savings State Medicaid programs could obtain if enrollees who smoke switched to e-cigarettes. Beyond public health, Dr. Belzer has published a benefit-cost analysis of the inclusion of juveniles within sex offender registries. He also is an analyst of patent law and examination practices and the economics of certain innovations in world wine markets.

Dr. Belzer is a regular volunteer contributor to scholarly professions, primarily through journal peer review and service to professional societies. He was elected Treasurer of the Society for Risk Analysis (SRA) in 1998 and 2000; elected Secretary-Treasurer of the Society for Benefit-Cost Analysis (SBCA) in 2008, 2010, and 2012; and elected Treasurer of the SBCA in 2014. He earned multiple awards for exemplary performance during his tenure at OMB and was named a Fellow of the Cecil and Ida Green Center for the Study of Science and Society in 1995. Dr. Belzer was given the SRA's Distinguished Service Award in 2003 and the SBCA's Richard O. Zerbe, Jr., Distinguished Service Award in 2017.

Since 2015, Dr. Belzer has been a member of the U.S. Environmental Protection Agency's Science Advisory Board Economy-wide Modeling Panel. The panel is charged with providing advice to the Agency on the use of sophisticated, data-intensive tools for estimating the full effects of major environmental regulations.

More information concerning Dr. Belzer's work, including seminar presentations and testimony, can be found on his website at <u>www.rbbelzer.com</u>.

This report was prepared on behalf of the California Manufacturers and Technology Association. All professional opinions expressed herein and not otherwise attributed are those of the author.

### 1. Executive Summary

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The State Water Board has the responsibility of setting drinking water standards that are both technologically feasible and economically feasible. The Board has carefully considered
 S-1 technological feasibility of its proposed 5 ppt MCL for 1,2,3-trichloropropane (TCP), it has not performed a similar analysis of economic feasibility. Given the limited information disclosed by the Board, its proposed standard clearly is not economically feasible.

The State Water Board's proposal has serious procedural defects, including conflicting information about the Board's cost-benefit analysis:

- The Board says it did not perform a cost-benefit analysis to determine that the proposed MCL is economically feasible. However, it is impossible to determine economic feasibility without performing a cost-benefit analysis.
- The Board provided documents to peer reviewers clearly indicating that the Board performed a "full cost-benefit analysis." However, the Board did not disclose this analysis to the peer reviewers and has not disclosed it to the public.
  - The Board apparently knows how much every household affected would have to pay but has disclosed only average costs by system size for each MCL. This is misleading. Many
- S-3 households would pay more than the average, and the public deserves to know how much more they would pay. This could be substantial, for even the limited information disclosed by the Board indicates that some households served by small systems may have to pay over \$8,000 per year.

The State Water Board's determination of economic feasibility is inconsistent with an economic interpretation of this statutory term:

- Any economic determination of economic feasibility would take account of the actual benefits obtained from treatment.
- At the proposed MCL, the average household bears more in cost than it receives in *potential* value even from *theoretical* risk reductions. Excess cost would be substantially greater if the Board had properly estimated risk reduction objectively.

A simple and straightforward methodology can be used to apply *economic reasoning* to S-6 determine economic feasibility. The Board produced all the information needed to apply economic reasoning, then chose not to do so:

• <u>For small systems</u>, the Board's estimated cost for the proposed MCL is \$97 million per theoretical cancer case averted. This is 10 times the maximum value that the U.S. Environmental Protection Agency routinely uses as its upper bound valuation for

Richard B. Belzer, Ph.D. Regulation, Risk, Economics & Information Quality Strategy & Analysis Consulting <u>rbbelzer@post.harvard.edu</u> 11703.780.1850 averting an actual premature mortality. Even at 150 ppt – the highest MCL considered – the Board's estimated cost is \$21 million per theoretical cancer case averted.

• <u>For large systems</u>, the Board's estimated cost for the proposed MCL is \$14 million per theoretical cancer case averted. This is almost 2 times the USEPA upper-bound for averting an actual premature mortality. The lowest MCL considered by the Board that is less than the USEPA upper-bound for averting an actual premature mortality is 35 ppt.

S-7 When the incremental effects of adjacent MCLs are considered, the evidence against economic feasibility gets even stronger:

- For small systems:
  - The incremental cost of proposing 5 ppt over 7 ppt is \$394 million per theoretical cancer case averted.
  - The incremental cost of proposing 7 ppt over 15 ppt is \$412 million per theoretical cancer case averted.
  - The incremental cost of proposing 15 ppt over 35 ppt is \$99 million per theoretical cancer case averted.
  - The incremental cost of proposing 35 ppt over 70 ppt is \$48 million per theoretical cancer case averted.
  - The incremental cost of proposing 70 ppt over 150 ppt is \$104 million per theoretical cancer case averted.
- For large systems:
  - The incremental cost of proposing 5 ppt over 7 ppt is \$196 million per theoretical cancer case averted.
  - The incremental cost of proposing 7 ppt over 15 ppt is \$56 million per theoretical cancer case averted.
  - The incremental cost of proposing 15 ppt over 35 ppt is \$48 million per theoretical cancer case averted.
  - The incremental cost of proposing 35 ppt over 70 ppt is \$27 million per theoretical cancer case averted.
  - The incremental cost of proposing 70 ppt over 150 ppt is \$15 million per theoretical cancer case averted.

These results are sufficient to conclude that the Board's proposal is economically infeasible if this statutory term is given an economic meaning. None of the alternative MCLs considered is economically feasible for small systems. Even under the most generous interpretation, the lowest MCL that might be economically feasible for large systems is somewhere between 35 and 70 ppt.

Richard B. Belzer, Ph.D. Regulation, Risk, Economics & Information Quality Strategy & Analysis Consulting <u>rbbelzer@post.harvard.edu</u> III 703.780.1850

# 2. The Board is Required to Separately Determine Technological Feasibility and Economic Feasibility

The California Safe Drinking Water Act, HSC § 116365, sets forth a complex, multi-part scheme for setting primary drinking water standards. The statute requires separate determinations of technological feasibility and economic feasibility. Technical feasibility may vary by system size, type of source, coincident contaminants or treatment trains in place, and other factors. A treatment technology need not be technologically feasible in every case to be technologically feasible in some cases. Technological feasibility is strictly an engineering question; either a standard can be achieved through a particular treatment method, at the scope and scale required, or it cannot. If the standard cannot be reliably achieved, it cannot be technologically feasible.

Technological feasibility is a prerequisite for economic feasibility. It is easy to imagine technologies that could achieve a given standard at a cost that everyone agrees is exorbitant. What's needed is a rational, consistent and transparent way to determine when treatment cost is "too high." When economic principles are relied upon, a rational, consistent and transparent determination is the result.

The State Water Board considered six alternative MCLs: 0.000005, 0.000007, 0.000015, 0.000035, 0.00007, and 0.00015 mg/l (5, 7, 15, 35, 70 and 150 ppt). However, there is evidence that the Board seriously considered only 5 and 15 ppt.<sup>1</sup> Determining the economic feasibility of each alternative MCL requires comparing the cost of compliance with the value of risk reduction that is reasonably expected to be achieved. The generally accepted method multiplies the number of cases avoided by an appropriate valuation factor. For premature mortality, this is called the Value of a Statistical Life (VSL), and it is routinely used by the U.S. Environmental Protection Agency (USEPA).<sup>2</sup> The VSL is essential because risk reductions must be monetized to be compared with costs.

The Board attempts to compare benefits and costs, but gets mired in confusion:

Tables 2-4 set out the costs associated with each alternative, and while they show some costs savings when the MCL is set at a higher level, those costs savings per service connection are relatively insignificant. Therefore, choosing an MCL at a higher level would be inconsistent with HSC section

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<sup>&</sup>lt;sup>1</sup> Compare State Water Resources Control Board (2017e), p. 28 (claiming having considered six alternatives) and State Water Resources Control Board (2016) (acknowledging having considered only 5 ppt and 15 ppt).

<sup>&</sup>lt;sup>2</sup> For condensed treatment of the VSL concept, *see* Viscusi (1998). For a comprehensive (albeit dated) review of the scholarly literature, *see* Viscusi (1993). For the most recent U.S. Environmental Protection Agency guidance on the choice of valuation factors, *see* U.S. Environmental Protection Agency (2016).

116365, would be somewhat less protective of public health, and would not result in significant cost savings.<sup>3</sup>

This description is inconsistent with established economic principles and practices, including those published in guidance by USEPA. The Board's approach fails to identify any guiding principle for decision-making. Whereas the statute directs the Board to ensure that MCLs are both technologically feasible *and* economically feasible, the Board appears to have wholly subordinated economic feasibility to technological feasibility.<sup>4</sup> The inconsistent application of a rule-based determination is indistinguishable from an arbitrary, *post hoc* decision.

### 2.1. Comparing alternative MCLs

S-11 Which of the alternatives considered would have met the test of economic feasibility had the State Water Board correctly applied economic principles depends on relevant facts. Nonetheless, if it is true that the proposed MCL is economically feasible, then every less-stringent alternative must be economically feasible as well. This is because costs rise exponentially as the MCL approaches the PHG, but benefits (at least as calculated by the Board) are essentially constant across all potential MCLs.

#### 2.2. Peer review

S-12 California Health and Safety Code § 57004(b) requires the State Water Board to secure an "external scientific peer review of the scientific basis for any rule proposed for adoption." The term *scientific basis* is further defined as "those foundations of a rule that are premised upon, or derived from, empirical data or other scientific findings, conclusions, or assumptions establishing a regulatory level, standard, or other requirement for the protection of public health or the environment."<sup>5</sup> The scientific basis "shall be deemed to have complied with this section if it complies with the peer review processes established pursuant to these statutes."<sup>6</sup> If the peer reviewer(s) conclude that the Board "has failed to demonstrate that the scientific portion of the proposed rule is based upon sound scientific knowledge, methods, and practices, the report shall state that finding, and the reasons explaining the finding..." However, the Board "may accept the finding of the external scientific peer review entity, in whole, or in part, and may revise the scientific portions of the proposed rule accordingly," or if it "disagrees with any

<sup>&</sup>lt;sup>3</sup> State Water Resources Control Board (2017e), p. 28.

<sup>&</sup>lt;sup>4</sup> The Board claims that economic feasibility had a larger role than technological feasibility in the selection of the proposed MCL. *See* State Water Resources Control Board (2017e), p. 19 ("In determining the feasibility of the alternatives considered, the economic feasibility of the proposed alternative weighed more heavily than considerations of technical feasibility"). The evidence for this in the Board's documents is scanty as best, and in any case, it is refuted by the analysis presented in Section 4.

 $<sup>^{\</sup>rm 5}$  Health and Safety Code 57004 .

<sup>&</sup>lt;sup>6</sup> Health and Safety Code 57004 (b).

aspect of the finding of the external scientific peer review entity, it shall explain, and include as part of the rulemaking record, its basis for arriving at such a determination in the adoption of the final rule, including the reasons why it has determined that the scientific portions of the proposed rule are based on sound scientific knowledge, methods, and practices."<sup>7</sup>

The key task for the peer reviewers was to review the scientific basis of the Board's determination of economic feasibility. However, the peer reviewers were severely handicapped. The Board did not disclose its cost-benefit analysis, and none of the reviewers was trained in economics.

## 3. Procedural Deficiencies in the State Water Board's Proposal

3.1. General lack of transparency in the documents disclosed by the State Water Board

S-13 The documents disclosed by the State Water Board are wholly inadequate for reproducing its work, and that makes it impossible for the public to conduct a proper review and provide informed comments. The Board's inadequate disclosure contrasts notably from the information disclosed by the Division of Drinking Water in a recent previous rulemaking.<sup>8</sup>

First, the Board disclosed virtually no data. Even where the Board discloses data, they are often inconsistent. In the Initial Statement of Reasons (ISOR), the Board identified 289 sources that would be affected by the proposed MCL. However, on the Board's website, 562 sources are so identified. Similarly, in the ISOR the Board reports that 103 systems would be affected but 94 systems are identified on the Board's website.<sup>9</sup> No explanation is given for these discrepancies, and they raise serious doubts about the reliability and accuracy of the Board's calculations.

Second, its Cost Estimation Methodology<sup>10</sup> provides only the briefest summary of the Board's analytic approach. Results presented in the attached tables cannot be reproduced or validated. If this were a proposed *federal* Safe Drinking Water Act primary drinking water standard, U.S. Environmental Protection Agency would have "shown its work" because doing so is explicit USEPA policy.<sup>11</sup>

Richard B. Belzer, Ph.D.

Regulation, Risk, Economics & Information Quality Strategy & Analysis Consulting rbbelzer@post.harvard.edu II 703.780.1850

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<sup>&</sup>lt;sup>7</sup> Health and Safety Code 57004 (d)(2).

<sup>&</sup>lt;sup>8</sup> *Compare*, e.g., the 1,2,3- TCP cost estimation methodology, State Water Resources Control Board (2017d) (28 pp. including tables) with the hexavalent chromium cost estimation methodology, California Department of Public Health (2013) (84 pp. Including tables).

<sup>&</sup>lt;sup>9</sup> *Compare* State Water Resources Control Board (2017e), Table 4, with State Water Resources Control Board (2017b).

<sup>&</sup>lt;sup>10</sup> State Water Resources Control Board (2017d).

<sup>&</sup>lt;sup>11</sup> U.S. Environmental Protection Agency (2002a).

3.2. The Board did not disclose a credible economic feasibility analysis, and denies having conducted the cost-benefit analysis that was necessary to perform an economic feasibility analysis

The State Water Board did not disclose a *bona fide* economic feasibility analysis or a costbenefit analysis, which is a prerequisite for determining economic feasibility. The Initial Statement of Reasons contains brief sections titled "economic feasibility," but these sections do not include actual *analyses* of economic feasibility.<sup>12</sup> Most of the text merely summarizes the Board's cost estimates. In lieu of what the law requires, the Board offers unsupported, boilerplate assertions without any reasoned basis.

The Board states that it "does not perform a cost-benefit analysis when evaluating economic feasibility,"<sup>13</sup> but nowhere does the Board clearly explain exactly what it *did* do. This is especially peculiar given that the Board recognizes that it has a separate obligation to conduct an analysis pursuant to Government Code § 11340 *et seq.*, and that this report "should include the benefits of the regulatory action."<sup>14</sup> How this is to be done without conducting cost-benefit analysis is not explained. Moreover, the Division of Drinking Water has previously acknowledged in many previous drinking water rulemakings that cost-benefit analysis is essential.<sup>15</sup>

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 The Board's denial that it has conducted a cost-benefit analysis is contradicted by documents it supplied to peer reviewers. In a document describing how data from water sources were "filtered to remove sources that are not active drinking water sources," the Board acknowledges that it performed a "full cost-benefit analysis":

This worksheet has been filtered to highlight small water sources with average source concentrations of 1,2,3-TCP of more than 150 ng/L. Small water sources (or SWS) are for this analysis water systems with <200 service connections, which is used as a separator in some regulations. In the full version of the cost-benefit analysis the filtering of concentration and service

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<sup>&</sup>lt;sup>12</sup> State Water Resources Control Board (2017e), pp. 13-16 (on monitoring) and pp. 17-19 (on treatment).

<sup>&</sup>lt;sup>13</sup> State Water Resources Control Board (2017a), p. 6. A similar statement can be found in the Standardized Regulatory Impact Analysis. *See* State Water Resources Control Board (2016), Attachment A, p. 5.

<sup>&</sup>lt;sup>14</sup> State Water Resources Control Board (2017e), p. 5.

<sup>&</sup>lt;sup>15</sup> See, e.g., California Department of Health Services (1999a), California Department of Health Services (1999b), California Department of Health Services (1999c), California Department of Public Health (2008), California Department of Public Health (2013), State Water Resources Control Board (2015).

<u>connections occurs later in the process</u>, but for ease of understanding the source narrowing has been performed now.<sup>16</sup>

## The implied existence of a "full cost-benefit analysis: is acknowledged a second time:

S-19 Three versions of this worksheet (Small Water Systems, Large Water Systems, and Treated Water Systems) are included to help better illustrate the final <u>cost-benefit results</u>.<sup>17</sup>

Thus, it appears that the State Water Board conducted a cost-benefit analysis of the form it denies is required by law and denies having performed. Given the limited information the Board did disclose, the inability of the public to reproduce the Board's results based on this limited disclosure, and the fact that what the Board did disclose came from Excel spreadsheets<sup>18</sup> that were not themselves disclosed, it is reasonable to infer that the Board performed, but did not disclose, a full cost-benefit analysis.

# S-20 3.3. The Board does not have a reasoned basis for the economic feasibility determinations it made

Whether treatment is economically feasible for any alternative MCL ought to be determined using economic principles. This is not how the Board proposes to decide, however.

Figure A illustrates such a model, assuming a linear no-threshold risk model as used by Office of Environmental Health Hazard Assessment (OEHHA) to derive the PHG. The benefit of treatment per connection (shown in green) is linear and intersects the origin. However, cost (shown in red) rises as the MCL becomes more stringent. Any MCL lower than T\* is economically infeasible because it delivers less benefit than cost. For any fixed technology, the higher the risk posed by the contaminant, the higher on the graph the green benefit line will be and the closer to zero T\* will be located.<sup>19</sup> A simplified way to implement the model is shown in Figure B, which displays the benefit information in cost-effectiveness units (i.e., cost per unit of benefit).

In contrast to this economic model of economic feasibility, which has a solution that can be determined using data that the Board has on file, the model used by the Board cannot be shown graphically, calculated quantitatively, or coherently described verbally.

<sup>&</sup>lt;sup>16</sup> State Water Resources Control Board (2017c), p. 1 (emphasis added).

<sup>&</sup>lt;sup>17</sup> State Water Resources Control Board (2017c), p. 6 (emphasis added).

<sup>&</sup>lt;sup>18</sup> See the embedded comment on p. 4 of State Water Resources Control Board (2017c) ("Missing text was added "...estimate the overall monitoring costs." that had been previously cut off in conversion to a pdf document from Excel").

<sup>&</sup>lt;sup>19</sup> MCLs below MCL<sub>b</sub>, the PHG, are not permitted by law.

Figure A: Economic Feasibility of Treatment



Figure B: Economic Feasibility of Treatment (Simplified)



Richard B. Belzer, Ph.D. Regulation, Risk, Economics & Information Quality Strategy & Analysis Consulting rbbelzer@post.harvard.edu III 703.780.1850 The Board reports estimated costs per source, system, and connection for each alternative MCL, and estimates cost per "theoretical" cancer case avoided. But nowhere does the Board provide a reasoned basis for concluding that the proposed MCL (or any other MCL) is economically feasible, nor does the Board reveal the criteria it used to make this determination. The closest thing to a reasoned basis is the Board's assertion that there are no "significant changes" in the *cost per connection* as the MCL approaches the PHG:

The State Water Board considers an MCL of 0.000005 mg/L to be economically feasible. The State Water Board evaluated the costs of compliance with the proposed MCL to public water systems, customers, and other affected parties. The evaluation included the cost per connection and aggregate cost of compliance using the best available technology. The proposed MCL is not anticipated to place a significant economic burden to the State of California as a whole. The evaluated MCLs did not indicate significant changes in cost on a per-connection basis as the evaluated MCL was increased.<sup>20</sup>

This argument has several flaws. Most obviously, cost per connection is an inappropriate metric for measuring economic feasibility. First, it ignores risk reduction, the achievement of which is the purpose of the regulatory standard. Second, it has no stopping point: there is no reasoned basis for deciding how high cost per connection must be before the Board would conclude that it is economically infeasible. A decision rule without a rational stopping point is inherently arbitrary.

Third, the Board's expressed concern about the high cost of the proposed MCL for small systems demonstrates confusion about the difference between cost and net benefit. The estimated average \$609 cost at 5 ppt is "high" because it produces no more than \$27 in reduced health risk. Households get nothing in return for the remaining \$582. This is not merely a wasteful diversion; it may have the unintended (and clearly undesirable) effect of *increasing other health risks*, particularly among the poor.<sup>21</sup>

Of course, there are circumstances in which spending the additional \$609 would be economically feasible. For example, If the risk posed by 1,2,3-TCP were 100 times greater than calculated by OEHHA, a household might gain as much as \$2,790 worth of benefits from reduced risk at the 5 ppt MCL. In that case, a 5 ppt MCL clearly would be economically feasible. For every dollar increase in the household's water bill, it would gain \$4.42 in benefits from risk reduction. Under the Board's proposal, however, each dollar increase in the household's water bill returns less than five cents in risk reduction benefit.

Richard B. Belzer, Ph.D. Regulation, Risk, Economics & Information Quality Strategy & Analysis Consulting rbbelzer@post.harvard.edu III 703.780.1850

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<sup>&</sup>lt;sup>20</sup> State Water Resources Control Board (2017e), p. 22. "[A]s the evaluated MCL was Increased" appears to mean was "made more stringent."

<sup>&</sup>lt;sup>21</sup> See, e.g., Keeney (1990), Keeney (1994) and Lutter and Morrall III (1994).

Fourth, the Board's exclusive focus on averages ignores variability across systems. If the average cost per connection for small-system customers is \$609 for a 5 ppt MCL, for many households cost will be much higher. A hint about just how high can be gleaned from the Board's calculations. Setting the MCL at 35 ppt instead of 70 ppt brings in additional eight connections into the treatment regime, but at an annualized cost of \$70,173, or \$8,772 per connection. Obviously, this is very different from the Board's \$632 average small-system cost per connection at 35 ppt. Yet these extraordinary costs per connection do not go away if the MCL is set below 35 ppt. All that changes are the number of connections over which cost is averaged.

If every system is like every other system, then averaging will accurately describe the effects that the public can expect. But the more that systems are different, the more misleading the average will be. Large net benefits realized by a few systems can disguise a widespread pattern of net costs. Statewide aggregation is especially inappropriate because it hides all the variability.

The State Water Board appears to have sufficient information to report estimated annualized cost for each system. It has not done so, however; the Board only reports averages. Yet we know from the 70 ppt to 35 ppt comparison described above that cost per connection among small-system customers varies by at least a factor of 25, and quite possibly much more.

## 4. Economic Feasibility of Treatment as Indicated by Cost-Effectiveness

Using the model described in Section 3.3, an MCL may be economically feasible if benefits exceed costs. Further, the smaller the unit of analysis, the more likely this result is valid. Calculations per household should be performed at the system level, where costs are borne, and systems should be ranked.

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4.1. The Board improperly included "treated" sources for which there is no exposure, thus exaggerating its calculated number of theoretical cancer cases averted

Table 4 in the Initial Statement of Reasons (ISOR) includes two boxes within the results for each alternative MCL considered.<sup>22</sup> One box applies to the Board's estimates of the costs of treatment:

Costs are for systems requiring treatment. Monitoring costs for noncontaminated sources and contaminated sources without treatment are not included.

A second box applies to the Board's estimate of theoretical cancer cases averted thorough treatment:

<sup>&</sup>lt;sup>22</sup> State Water Resources Control Board (2017e).

Includes estimated reduction in theoretical cancer case per year for existing 1,2,3-TCP treated systems[.]

These approaches are analytically inconsistent. The Board's cost estimate includes only "systems requiring treatment" but its calculation of risk reduction appears to include cancer cases averted by treatment systems already in place. This apples-to-oranges comparison violates elementary principles of economic analysis, which require that the same baseline be used for both sides of the ledger. It is highly misleading to count benefits that cannot exist, and the Board must remove them.

# S-27

4.2. The Board's own analysis shows the proposed MCL is not economically feasible regardless of system size

Figure C and Figure D follow the simplified model presented in Figure B to show the Board's estimated cost per "theoretical" cancer case avoided for small and large water systems, respectively.<sup>23</sup> After considerable research, analysis and peer review by its Science Advisory Board, the U.S. Environmental Protection Agency (USEPA) has established an upper-bound value for avoiding the premature mortality of a random person in a population whose members face small unit risks. The USEPA "value of a statistical life" (VSL), updated to 2016 dollars,<sup>24</sup> is superimposed in green on both graphs. Average valuations for each alternative MCL are identified, and the trend in values is represented by a smoothed curve for easier visualization. Economic feasibility requires that the red curve be lower than the green line.<sup>25</sup>

For households served by large water systems, at the proposed MCL treatment produces no S-28 more than \$0.63 in *theoretical* benefit from risk reduction for every *tangible* dollar spent on treatment. Only the 35, 70 and 150 ppt MCLs produce greater *theoretical* benefit than *tangible* cost. At the proposed MCL, it takes treatment at more than 554,000 connections to prevent a single *theoretical* cancer case.

For small water systems, none of the MCLs considered by the Board is economically
 feasible. Depending on the MCL, each dollar in *tangible* cost produces from \$0.09 to \$0.41 in *theoretical* benefit per *tangible* dollar in cost. At the proposed MCL, it takes treatment at nearly 160,000 connections to prevent a single *theoretical* cancer case.

Richard B. Belzer, Ph.D. Regulation, Risk, Economics & Information Quality Strategy & Analysis Consulting <u>rbbelzer@post.harvard.edu</u> III 703.780.1850

<sup>&</sup>lt;sup>23</sup> State Water Resources Control Board (2017e), Table 4.

<sup>&</sup>lt;sup>24</sup> U.S. Environmental Protection Agency (2016), p. 7-8 (\$7.9 million (\$2008) multiplied by the ratio of the 2016 and 2008 GDP deflators (112.216/99.808) yields \$8,879,600. The USEPA VSL applies to *tangible*, not merely *theoretical*, premature mortality risks.

<sup>&</sup>lt;sup>25</sup> The curve for small water systems displays a hitch that suggest the potential for material error in the Board's analysis. A more stringent MCL should never be less expensive.
Figure C Board-Estimated Cost per Theoretical Cancer Case Avoided (SWS) [data labels: MCL in ppt; \$ millions per theoretical cancer case avoided]



Figure D: Board-Estimated Cost per Theoretical Cancer Case Avoided (LWS) [data labels: MCL in ppt; \$ millions per theoretical cancer case avoided]



Richard B. Belzer, Ph.D. Regulation, Risk, Economics & Information Quality Strategy & Analysis Consulting <u>rbbelzer@post.harvard.edu</u> CC 703.780.1850

# S-30 4.3. Comparing adjacent alternative MCLs shows that each incremental progression to greater stringency exacerbates economic infeasibility

The analysis in Section 4.2 provides insight only about the *average* effects of each alternative MCL. Greater insight can be gleaned by comparing the incremental costs and risk reductions obtained by moving from any alternative MCL to its next more stringent neighbor.

Figure E shows for small water systems the incremental cost per theoretical cancer case avoided for each adjacent pair of MCLs the Board considered. The least expensive marginal tightening occurs moving from 70 to 35 ppt, but even that costs *\$48 million* per theoretical cancer case avoided. That is six times the USEPA VSL. The last increment of stringency – from 7 to 5 ppt – costs \$394 million per theoretical cancer case avoided, or almost 50 times the USEPA VSL.<sup>26</sup>

Figure F displays the same information for large water systems. The 150 ppt MCL may be economically feasible because the cost per theoretical cancer case avoided is about \$2 million. All other incremental changes are not, however. Incremental cost-effectiveness ranges from \$15 million to \$196 million per theoretical cancer case avoided. None of these incremental cost-effectiveness ratios offers anything close to the USEPA VSL.

4.4. Comparing alternative MCLs not proposed to the Board's 5 ppt proposed MCL

S-32 Similar comparisons can be made between the proposed MCL and each of the five alternatives considered by the Board. These comparisons are shown in Figure G (for small systems) and Figure H (for large systems).

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For small systems, cost per theoretical cancer case avoided ranges from \$135 million (moving from 150 to 5 ppt) to \$408 million (moving from 7 to 5 ppt). For large systems, cost per theoretical cancer case avoided ranges from \$41 million (moving from 150 to 5 ppt) to \$90 million (moving from 7 to 5 ppt).

<sup>&</sup>lt;sup>26</sup> Where USEPA expects such an investment at the margin to prevent at least six *actual* premature mortalities, the 5 ppt MCL would prevent at most 2.4 *theoretical* cancer cases.



Figure E: Implied Incremental Cost per Theoretical Cancer Case Avoided when Adjacent MCLs are Compared (SWS)

Figure F: Implied Incremental Cost per Theoretical Cancer Case Avoided when Adjacent MCLs are Compared (LWS)



Richard B. Belzer, Ph.D. Regulation, Risk, Economics & Information Quality Strategy & Analysis Consulting <u>rbbelzer@post.harvard.edu</u> III 703.780.1850

Figure G: Cost per Theoretical Cancer Case Avoided if Moving from Each of the Five Alternative MCLs to the Board's Proposed 5 ppt MCL (SWS)



Figure H:

Implied Cost per Theoretical Cancer Case Avoided if Moving from Each of the Five Alternative MCLs to the Board's Proposed 5 ppt MCL (LWS)



Richard B. Belzer, Ph.D. Regulation, Risk, Economics & Information Quality Strategy & Analysis Consulting <u>rbbelzer@post.harvard.edu</u> III 703.780.1850 4.5. Adjusting the Board's calculations for compatibility with the assumption in PHG that risk is proportional to lifetime dose

The State Water Board appears to assume that cancer risk reductions are realized immediately after exposure is reduced or eliminated. This assumption would be inconsistent with the cancer risk model OEHHA used to derive the PHG, however. OEHHA's risk model equates an increase of 0.0007 ppb of 1,2,3-TCP ingested at 4 liters/day equivalent for 70 years with a one in 1 million excess cancer risk. Thus, it follows that a decrease in exposure at the same rate for the same period would reduce cancer risk by one in 1 million. But the Board appears to assume that all cancer risk reductions occur immediately, not over 70 years.<sup>27</sup> The

years of exposure reduction for each connection.

In 2015, the median age of California residents was 36.2 years,<sup>28</sup> implying that the median resident whose drinking water is treated would gain 33.8 years of exposure reductions, or 48% of the unit risk reduction.<sup>29</sup> This reduction in calculated cancer risk reduction can be illustrated by reducing the USEPA VSL from \$8.9 million to \$4.3 million. Figure I shows that this adjustment has no material effect in economic feasibility for small water systems. However, the adjustment matters for large systems, as Figure J shows. The most stringent MCL that is economically feasible is now someplace between 35 and 70 ppt.

correct way to perform this calculation requires taking account of the estimated number of

S-33

<sup>&</sup>lt;sup>27</sup> This inference is drawn from State Water Resources Control Board (2017d), but it cannot be confirmed because the Board did not show its work.

<sup>&</sup>lt;sup>28</sup> U.S. Census Bureau (2015).

<sup>&</sup>lt;sup>29</sup> A more sophisticated adjustment would take account of the age distribution and average weights of persons in each age distribution group. The OEHHA risk model assumes the weight of an adult is 70 kg.



Figure I: Board-Estimated Cost per Theoretical Cancer Case Avoided

Figure J: Board-Estimated Cost per Theoretical Cancer Case Avoided Adjusted for Years of Exposure Avoided (LWS) [data labels: MCL in ppt; \$ millions per theoretical cancer case avoided]



Richard B. Belzer, Ph.D. Regulation, Risk, Economics & Information Quality Strategy & Analysis Consulting rbbelzer@post.harvard.edu E2703.780.1850

## 5. Other adjustments needed to produce a reliable economic feasibility analysis

Additional adjustments are needed to transform the Board's work into a proper economic S-34 feasibility analysis. These adjustments follow economic analysis guidance published by USEPA:

Risk assessors and economists should:

- ...
- 1. Estimate changes in the probabilities of human health or ecological outcomes rather than 'safety assessment' measures such as reference doses and reference concentrations.
- 2. Work to produce expected or central estimates of risk, rather than bounding estimates as in safety assessments. At a minimum, any expected bias in the risk estimates should be clearly described.
- 3. Attempt to estimate the "cessation lag" associated with reductions in exposure. That is, the analysis should characterize the time profile of changes in exposures and risks.
- 4. Attempt to characterize the full uncertainty distribution associated with risk estimates.<sup>30</sup>

S-35 Each of these items has an important implication for the State Water Board's analysis, and is discussed in the subsections below.

5.1. Risk must be estimated in a manner compatible with economic principles to correctly determine economic feasibility

The purpose of the PHG is to identify a "virtually safe dose," an exposure level that "avoids any significant risk to public health."<sup>31</sup> The State Water Board has a different responsibility: determining which MCLs are economically feasible. That requires estimating risk reduction objectively. It is not sufficient to calculate "theoretical" cancer cases avoided, as the Board has done. Reductions in cancer incidence can only be reliably estimated using an objective

<sup>&</sup>lt;sup>30</sup> U.S. Environmental Protection Agency (2016), p. 7-5. The "reference dose" is USEPA's version of the safety assessment performed by OEHHA, resulting in the PHG. For more on its methodology, *see* Barnes and Dourson (1988), U.S. Environmental Protection Agency (2002b), U.S. Environmental Protection Agency (2012b).

<sup>&</sup>lt;sup>31</sup> Compare Faustman and Omenn (2001), p. 95 ["a dose that gives an 'acceptable level' of risk (e.g., upper confidence limit for 10<sup>-6</sup> excess risk")] and Office of Environmental Health Hazard Assessment (2009), p.2 ["OEHHA sets PHGs for carcinogens at a de minimis risk level of one in a million (10<sup>-6</sup>)"].

characterization of dose-response, and the State Water Board did not perform any such characterization.<sup>32</sup>

The Board calculates cancer cases using a formula in the PHG. But the PHG is what USEPA calls a "safety assessment" that yields "bounding estimates" rather than "expected or central estimates of risk." A properly conducted economic feasibility analysis must use "expected or central estimates of risk." Therefore, the Board should compare its cost estimates with estimates of the *actual* number of cancer cases the public can reasonably anticipate will be prevented.

The laboratory studies OEHHA used to derive the PHG have key features that make the PHG inappropriate for directly estimating human cancer risk. First, rats and mice received by gavage doses of 1,2,3-TCP substantially higher than the levels to which humans are exposed via drinking water.<sup>33</sup> Second, these doses likely exceeded what toxicologists call the Maximum Tolerated Dose (MTD). When the MTD is exceeded in a laboratory animal study, cancer often occurs as a secondary result of frank toxicity.<sup>34</sup> And toxicity was evident in these bioassays; there was substantial weight loss and premature mortality from causes other than cancer.<sup>35</sup>

Third, gavage involves direct administration of a large dose of the contaminant, which can have long-lasting effects that would not occur in drinking water.<sup>36</sup> This is very different from drinking water ingestion, which involves a fairly constant concentration. Third, the use of corn oil instead of drinking water as the agent to carry the dose appears to have had its own, independent carcinogenic effects. In the words of peer reviewer Helmut Zarbl, corn oil "synergiz[es] with carcinogens by acting as a co-carcinogen or a tumor promoter, therefore

<sup>34</sup> Eaton and Klaassen (2001), p. 29; Katsonis, Burdock and Flamm (2001), pp. 1064-1065; Pitot III and Dragan (2001), pp, 293, 299; and National Research Council (1993).

<sup>35</sup> Despite its relevance, OEHHA did not discuss whether the studies it relied upon administered doses exceeding the MTD or whether such dosing could have had material effects on the results. *See* Office of Environmental Health Hazard Assessment (2009), and search for "MTD" and "Maximum Tolerated Dose." MTD also is not included in the State Water Board's list of relevant acronyms. *See* State Water Resources Control Board (2017f).

<sup>35</sup> La, Schoonhoven, Ito, et al. (1996), p. 108 ("Gavage administration, which results in high bolus concentrations compared to drinking water exposure, may quantitatively affect toxicokinetics, cytotoxicity, and genotoxicity"); and Tardiff and Carson (2010), p. 1506 ("cancer DWELs are based on corn oil studies and ... corn oil gavage, unlike drinking water exposure, contributes – perhaps extensively – to tumor production"). Concern about bolus doses is not mentioned in the PHG.

Richard B. Belzer, Ph.D. Regulation, Risk, Economics & Information Quality Strategy & Analysis Consulting <u>rbbelzer@post.harvard.edu</u> III 703.780.1850

<sup>&</sup>lt;sup>32</sup> Had the Board attempted to do so, two of the three peer reviewers had the requisite expertise to opine on whether it had succeeded. The charge to reviewers asked them only to validate the Board's arithmetic, a task not requiring a terminal degree in toxicology or mathematics.

<sup>&</sup>lt;sup>33</sup> Rats were administered 0, 5, 10 or 30 mg/kg-day 5 days/week. Mice were administered 0, 10, 30 or 60 mg/kg-day 5 days/week. *See* Office of Environmental Health Hazard Assessment (2009), pp. 16-23. These doses are 5-6 orders of magnitude greater than what humans might experience via drinking water.

<u>overestimating</u> carcinogenicity."<sup>37</sup> Finally, OEHHA relied on a cancer site in rodents – the forestomach of the female mouse -- that does not exist in humans, so its propriety for human cancer risk assessment is controversial.<sup>38</sup>

The product of this series of assumptions is an overstatement of the "expected or central estimates of human cancer risk." If the Board were to follow USEPA's guidance, it would estimate the bias inherent in the PHG and adjust its calculations of cancer cases avoided accordingly. One way to do that is to estimate risk using a model with *less* intentional bias, such as the model by Tardiff and Carson (2010). Instead of relying on a series of default assumptions, this model incorporates mode-of-action information and the weight-of-evidence framework established by the World Health Organisation's International Programme of Chemical Safety into a nonlinear dose-response model. When applied, this model produces an estimate of 200-280 ppb as the drinking water equivalent level that is "considered protective against tumors," and thus it is likely to be consistent with the statutory risk management directive that applies to PHGs.<sup>39</sup>

5.2. Adjusting the USEPA VSL to account for a different health endpoint

S-36 USEPA routinely uses the VSL to quantify the benefit of preventing premature mortality. This method does not apply without modification to other health endpoints, and economic analyses must use valuation defaults that match as closely as possible the actual endpoints of interest.<sup>40</sup> The nationwide 5-year survival rate for digestive system cancers in 2006-12 was 44.3%,<sup>41</sup> so an adjustment to the USEPA VSL is necessary and appropriate to account for this difference.

## 5.3. Cessation lags

S-37 For health endpoints such as cancer, there is a "cessation lag" defined as " the time interval between the cessation of exposure and the reduction in risk."<sup>42</sup> USEPA guidance directs analysts to account for cessation lags when valuing reduced mortality risks, and then discount

<sup>41</sup> Howlader N, Noone AM, Krapcho M, et al. (2016).

<sup>&</sup>lt;sup>37</sup> Versar (2008), p. 11 (comments by USEPA peer reviewer Helmut Zarbl, emphasis in original), possibly based on La, et al. (1996) (potency 1.4 to 2.4 times higher where corn oil was administered). See also Tardiff and Carson (2010), p. 1506 ("corn oil gavage, unlike drinking water exposure, contributes – perhaps extensively – to tumor production"). Concerns about gavage administration and the synergistic effect of corn oil are not mentioned in the PHG.

<sup>&</sup>lt;sup>38</sup> Proctor, Gatto, Hong, et al. (2007).

<sup>&</sup>lt;sup>39</sup> Tardiff and Carson (2010), p. 1506. A concentration that is "protective against tumors" is similar in intent to "avoid[ing] any significant risk to public health" (HSC § 116365(b)(2)). The concentration estimated to be protective against noncancer effects is 780 ppb.

<sup>&</sup>lt;sup>40</sup> U.S. Environmental Protection Agency (2016), p. 7-5.

<sup>&</sup>lt;sup>42</sup> U.S. Environmental Protection Agency (2016), p. x.

appropriately.<sup>43</sup> USEPA's independent Science Advisory Board concurs with this guidance and has further advised the Agency to discount delayed cancer reduction benefits at the same rate used to discount other future benefits and costs.<sup>44</sup>

#### 5.4. Discounting

When a regulatory action has future costs and benefits, both must be discounted in the same manner.<sup>45</sup> This enables apples-to-apples comparisons. The State Water Board used a 7% discount rate for future costs, so 7% is a reasonable discount rate to apply to future benefits.<sup>46</sup> The Board's published analysis compares apples to oranges – discounted costs and undiscounted benefits.

#### 6. Conclusions

S-39 This review is constrained by the limited information disclosed by the Board. Nonetheless, even if it is stipulated that the Board's data and cost model are true and correct, the proposed MCL clearly is not economically feasible. Average cost per theoretical cancer case avoided is \$97 million for small systems and \$14 million for large systems. These ratios are, respectively, 12 and two times the USEPA VSL, and the VSL applies to premature mortality, not cancer.

When the incremental effects of adjacent MCLs are considered, each of the alternative MCLs becomes even more economically infeasible. Moving from 7 ppt to 5 ppt covers an additional 214 small-system and 211,067 large-system connections. It accomplishes this at a price of \$394 million and \$196 million, respectively, per theoretical cancer case avoided.

For small systems, none of the MCLs considered by the Board is economically feasible. For large systems, several errors in the Board's analysis must be corrected to make this determination. Even without these corrections, the lowest MCL that might be economically feasible is somewhere between 35 and 70 ppt.

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<sup>&</sup>lt;sup>43</sup> U.S. Environmental Protection Agency (2016), p. 7-8.

<sup>&</sup>lt;sup>44</sup> U.S. Environmental Protection Agency Science Advisory Board (2000). The SAB committee used the term "latency" for the delayed onset of illness after exposure (as EPA's current guidance uses it) and delayed realization of benefits after reduction in exposure (what EPA's current guidance calls "cessation lag"). Different terms are appropriate because there is no biological reason why both delays would be the same. The impetus for the SAB review was a need to inform Agency analysts about how to capture both latency and cessation lag with respect to drinking water regulation.

<sup>&</sup>lt;sup>45</sup> U.S. Environmental Protection Agency (2016), Chapter 6.

<sup>&</sup>lt;sup>46</sup> The Board discounted only a 20-year stream of costs. This period may be insufficient to capture all benefits. However, the same time period must be used for both benefits and costs, so of a longer period is used for benefits it also must be used for costs.

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Richard B. Belzer, Ph.D. Regulation, Risk, Economics & Information Quality Strategy & Analysis Consulting <u>rbbelzer@post.harvard.edu</u> III 703.780.1850

**Public Comment** 1,2,3- TCP Deadline: 4/21/17 by 12 noon



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	4-17-17
	SWRCB Clerk

B

April 13, 2017

#### PASADENA WATER AND POWER

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc Steven Moore Dorene D'Adamo

California State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0100

Subject: Proposed Regulations for the Establishment of a Maximum Contaminant Level for 1, 2, 3 - Trichloropropane

On March 4, 2017 the State Water Resources Control Board (State Board) gave notice of the proposed rulemaking for Maximum Contaminant Level (MCL) for 1, 2, 3 -Trichloropropane (123-TCP). The City of Pasadena Water and Power Department (PWP), a Community Water System (CWS) serving the people of Pasadena, Altadena, East Pasadena, and East San Gabriel, hereby submit the following comments.

PWP supports the development of an MCL for 123-TCP, and believes that the proposed value of 5 nanograms per liter (or parts per trillion/ppt) is the appropriate level for to be set. PWP also supports the use of a Detection Level for Reporting (DLR) of 5 ppt as well as designating Granular Activated Carbon (GAC) as the Best Available Technology (BAT). GAC is an expensive technology, but given the reality that the overwhelming majority of CWSs that have 123-TCP in their water sources have Potentially Responsible Parties (PRPs) who will pay for such a system, GAC does make sense.

However, not every CWS with 123-TCP has PRP. There are some CWSs that have 123-TCP in their source water but no funding available to treat 123-TCP using GAC. Given the high cost of construction and operation, it is cost prohibitive for these CWSs to treat 123-TCP with GAC. These CWSs will in many cases blend down the 123-TCP rather than remove it by using GAC. PWP recommends that the language of the proposed regulations be expanded to recognize blending as a BAT or otherwise explicitly acknowledge it as an approved treatment.

SWRCB – Proposed Regulation for the Establishment of a Maximum Contaminant Level for 1, 2, 3 – Trichloropropane April 13, 2017 Page 2 of 2

PWP's second comment is to allow a numeric value of zero for laboratory results that are less the DLR when averaging is used for compliance. When blending is used, a CWS would need to develop a Blending Plan, which would require approval by the Division of Drinking Water, and would include a Blending Objective (BO). The BO is usually 80% of the MCL. Compliance with the BO is determined based on a calculated value, not a measured one. The concentration of the constituent is determined in each source then, using the flow rate and duration of operation of each source, a blended concentration is calculated. If the laboratory results are less than the DLR, then a substitute numeric value is used for averaging. Selecting the appropriate substitute value is critical. For example, where there are two wells, Well A which has 6 ppt of 123-TCP and Well B has less than the DLR, and the first well runs at 1,000 gallons per minute (gpm) and the second at 2,000 gpm and both operate for 24 hours. If the value zero is substituted for less than the DLR, then the calculated blend concentration is 2 ppt, half of the BO of 4 ppt. However, if the substituted value for less than the DLR is 5, the calculated value is 3.7 ppt, just barely below the BO. In either case there is a very narrow window of operational flexibility. The substituted value determines how much operational flexibility there will be. Complicating matters is the fact that few CWS can test for 123-TCP in-house, almost all will have to use contract laboratories. The analytical method is simply a very long, and involved test so turn-around times will not be short. This gives CWS very limited flexibility in terms of response times to elevated results. All in all, a rather difficult operational situation.

For the reasons identified above, PWP recommends that the State Board identify in the proposed regulations the use of blending as an approved treatment technique, and to use zero as a substitute value for laboratory results that are less than the DLR when averaging is used for compliance.

If you have any questions, please contact Mr. David Kimbrough, Water Quality Manager at 626.744.3704 in the mornings or 626.744.7315 in the afternoons.

Thank you for your attention in this matter

Sincerely,

Eric Klinkner C

Assistant General Manager/Chief Deputy

DEK/hs

Public Comment 1,2,3- TCP Deadline: 4/21/17 by 5pm



Know your environment. Protect your health.

CLEAN WATER

COMMUNITY WATER CENTER EL CENTRO COMUNITARIO POR EL AGUA

R	ECEIVED
	4-20-17
1	SWRCB Clerk

Felicia Marcus, Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member Joaquin Esquivel, Member State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0100

Re: 1,2,3-Trichloropropane MCL

Dear Chair Marcus and Members Doduc, Moore, D'Adamo and Esquivel:

The undersigned 2,228 supporters of Environmental Working Group, Clean Water Action and Community Water Center, urge the State Water Resources Control Board to adopt the Division of Drinking Water's proposed 5 part per trillion (ppt) maximum contaminant level (MCL) for 1,2,3-trichloropropane (TCP).

No one should drink water tainted with cancer-causing chemicals. That is why we support establishing a legal limit for 1,2,3-trichloropropane in drinking water at the detection limit of 5 parts per trillion.

Because it can cause cancer at very low levels, the public health goal for TCP is 0.7 ppt, one of the lowest the state has set for a drinking water contaminant. As you know, the state is required to establish drinking water standards as close to the public health goal as is economically and technically feasible. In the vast majority of TCP cases, there are responsible parties that courts have indicated can and should pay for water treatment, so this health-protective standard is both feasible and appropriate.

A 5 ppt standard for TCP will protect millions of Californians and affirm the state's commitment to the human right to water. Please move as quickly as possible to enact and implement this regulation.

Yours sincerely,

В

Zsoka	Toth	90	)403	SANTA MONICA	CA	
Zane	Pierce	94	043	MOUNTAIN VIEW	CA	
Zack	Hall	90	068	LOS ANGELES	CA	
yvonne	charles	94	612	OAKLAND	CA	
Yvonne	Donner	95	693	WILTON	CA	
Yvonne	Cabrales	94	619	OAKLAND	CA	
yvonne	behrens	94	608	EMERYVILLE	CA	
Yosh	Yamanaka	90	803	LONG BEACH	CA	
Ynana	Zovich	93	8401	SAN LUIS OBISPO	CA	
Yen	Chou	92	2101	SAN DIEGO	CA	
Yehuda	Pashut	95	5035	MILPITAS	CA	
Yazmin	Gonzalez	90	706	BELLFLOWER	CA	
Υ	Moore	95	603	AUBURN	CA	
Xx	Xx	92	2014	DEL MAR	CA	
William M.	Musser IV	95	5125	SAN JOSE	CA	
WILLIAM	DUTCHER	94	618	OAKLAND	CA	
William	Briggs	90	)254	HERMOSA BEACH	CA	
William	Wertz	94	132	SAN FRANCISCO	CA	
William	Mitchell	94	619	OAKLAND	CA	
William	Schlesinger	90	046	LOS ANGELES	CA	
William	Winters	94	608	EMERYVILLE	CA	
William	Huffman	94	404	SAN MATEO	CA	
William	Winburn	90	)275	RANCHO PALOS VERDES	CA	
William	Kolb	93	.006	ARCADIA	CA	
Wil	Levine	94	930	FAIRFAX	CA	
WEWE	FER	92	604	IRVINE	CA	
Wendy	Tokuda	94	611	OAKLAND	CA	
Wendy	Anderson	94	952	PETALUMA	CA	
Wendy	McCobb	93	8024	OJAI	CA	
Wendy	Magur	90	)272	PACIFIC PALISADES	CA	
Wendy	Wolfson	92	2009	CARLSBAD	CA	
Wendy	Hansen	95004-9	615			
Wendie	Lash	94	062	REDWOOD CITY	CA	
Wayne	Gibb	9	6436	FORESTVILLE	CA	
Wallace	limura	95	5014	CUPERTINO	CA	
Wai	Cheung	94	108	SAN FRANCISCO	CA	
W.	Popiel	93	.360	THOUSAND OAKS	CA	
Vonnie	lams	92	2064	POWAY	CA	
Voleta	Hummel	93	.355	VALENCIA	CA	
Vivian	Hernandez	94	605	OAKLAND	CA	
Viva	Tung	94	105	SAN FRANCISCO	CA	
Virginia	Rush	94	928	ROHNERT PARK	CA	

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Virginia	Proceviat	94306	PALO ALTO	CA
Virginia	Berton	95642	JACKSON	CA
Virginia	Rasnick	94552-1727		
Virginia	Croswhite	91001	ALTADENA	CA
Virginia	Eagan	95927	СНІСО	CA
Virginia	Collins	94577-1833		
Virginia	Haradon	95648-8338		
Violet	Hsu	94549	LAFAYETTE	CA
Vincent	Fong	95961	OLIVEHURST	CA
Vikas	Sawant	95014	CUPERTINO	CA
Victoria	Spiers	94703	BERKELEY	CA
victoria	wade	93933	MARINA	CA
Victoria	Brill	90254	HERMOSA BEACH	CA
Victoria	Lee	94122	SAN FRANCISCO	CA
Victoria	Holdridge	94903	SAN RAFAEL	CA
victoria	newman	95404	SANTA ROSA	CA
Vicky	Blank	91711	CLAREMONT	CA
Vicky	Johnson	95628	FAIR OAKS	CA
Vicki & Rod	Kastlie	92107	SAN DIEGO	CA
Vicki	Sinclair	92583	SAN JACINTO	CA
Vicki	Kinaman	94546	CASTRO VALLEY	CA
Vic	Bostock	91001	ALTADENA	CA
Veronika	Pascual	91355	VALENCIA	CA
Veronica	Aguirre-Dutt	93013	CARPINTERIA	CA
Vered	Dell	91401	VAN NUYS	CA
Vera	Loewer	94044	PACIFICA	CA
Vasu	Murti	94611	OAKLAND	CA
Vanessa	Fedor	90020	LOS ANGELES	CA
VANESSA	CHRISMAN	92649	HUNTINGTON BEACH	CA
Vanessa	Barrett	90042	LOS ANGELES	CA
Valjean	ONeill	92109	SAN DIEGO	CA
Valerie	Justus-Rusco	95076-0129		
Valerie	Schadt	90045	LOS ANGELES	CA
Valerie	Bengal	95062	SANTA CRUZ	CA
Valerie	Phillips	95611	CITRUS HEIGHTS	CA
Valerie	Morishige	90068	LOS ANGELES	CA
Valerie	Miller	91607	VALLEY VILLAGE	CA
Valentina	Gavrilenko	94043	MOUNTAIN VIEW	CA
v and b	Jones	90510	TORRANCE	CA
V	Stark	94039	MOUNTAIN VIEW	CA
V	Horn	94010	BURLINGAME	CA
v	bear	90808	LONG BEACH	CA

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V	Beauchamp	94904	GREENBRAE	CA	
Uvaldo	Sauceda	92532	LAKE ELSINORE	CA	
Twikie	Simms	92801-1904			
Twanet	Bender	95864	SACRAMENTO	CA	
Trudy	Israel	91423	SHERMAN OAKS	CA	
Trudi	Reinhardt	94303	PALO ALTO	CA	
Trisha	Hillier	90210	BEVERLY HILLS	CA	
Trish	Wahlberg	95959	NEVADA CITY	CA	
Tressa	Chung	92008	CARLSBAD	CA	
tramanh	le	94506	DANVILLE	CA	
traci	stevenson	95476	SONOMA	CA	
Tracey	Putnam	92114	SAN DIEGO	CA	
Tom	Nulty Jr	92629-3050			
Todd	Smith	95401	SANTA ROSA	CA	
Toby	Rogers	91107	PASADENA	CA	
Toby	Briggs	95811	SACRAMENTO	CA	
Tish	Thomas	95030	LOS GATOS	CA	
Tina	Ann	94924-0265			
Timothy	Taylor	90064-1919			
Timothy	Nolan	90065	LOS ANGELES	CA	
Timothy	Larkin	94109-5337			
Tim	Barrington	95112	SAN JOSE	CA	
Tim	McKenna	90046	LOS ANGELES	CA	
Tiio-Mai	McCurty	90028	LOS ANGELES	CA	
Tiffany	Schiele	92111	SAN DIEGO	CA	
Tibor	Horvath	95120	SAN JOSE	CA	
Tianna	Arnold	90019	LOS ANGELES	CA	x
Thomas	Savino	91506	BURBANK	CA	
Thomas	Gillespie	90638	LA MIRADA	CA	
THERESA	OWENS	94558	NAPA	CA	
Theresa	Seeber	93536	LANCASTER	CA	
Theresa	Corrigan	95820	SACRAMENTO	CA	
Theresa	McCall	94928	ROHNERT PARK	CA	
Theresa	Shay	90715	LAKEWOOD	CA	
Theodore C	Snyder	91344-1062			
Thais	Wagner	91709	CHINO HILLS	CA	
Terrylene	Sacchetti	92501	RIVERSIDE	CA	
Terry	Church	94952	PETALUMA	CA	
Terry	Campbell	94803	EL SOBRANTE	CA	
Terry	Dycus	92078	SAN MARCOS	CA	
Terry	Crary	96002	REDDING	CA	
Terry	Brejla	95370	SONORA	CA	

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terrill	maguire	95501	EUREKA	CA
Terri	Fulton	93001	VENTURA	CA
Terri	Devine	92385	SKYFOREST	CA
Teri	Roney	94965	SAUSALITO	CA
Teresa	Hitch	90041	LOS ANGELES	CA
Ted	Fishman	95123	SAN JOSE	CA
Tassy	Hennessy	92024	ENCINITAS	CA
tara	hawkins	92653	LAGUNA HILLS	CA
Tara	Owens	93111	SANTA BARBARA	CA
Tara	Gill	94536	FREMONT	CA
tanya	knopf	92704	SANTA ANA	CA
Tanya	Salof	91006	ARCADIA	CA
Tania	Vong	95111	SAN JOSE	CA
Tandi	Cline	95831	SACRAMENTO	CA
Tamra	McCoy	93705	FRESNO	CA
Tammy	Andrews	92255	PALM DESERT	CA
Tamara	Cain	95826	SACRAMENTO	' CA
Tamara	Sweger	94920	<b>BELVEDERE TIBURON</b>	CA
Tamara	Easter	95959	NEVADA CITY	CA
Sylvia	Khong-Terps	94116	SAN FRANCISCO	CA
sylvia	shaw	95521	ARCATA	CA
Sylvia	Smith	94610	OAKLAND	CA
Sylvia	Samuolis	94045		
Sylvia	Moffet	92024	ENCINITAS	CA
Sylvia	Israel	94930	FAIRFAX	CA
Sydney	Berner	91722	COVINA	CA
Sybil	Marcus	94705	BERKELEY	CA
suzy	goodman	90404	SANTA MONICA	CA
Suzi	Aubert	94509	ANTIOCH	CA
Suzanne	Casamento	90404	SANTA MONICA	CA
Suzanne	Lanham	92109-6602		
Suzanne	Commins	94611	OAKLAND	CA
Suzanne	Schrift	94706	ALBANY	CA
Suzanne	Schnitzer	92677	LAGUNA NIGUEL	CA
suzanne	Leon	94941	MILL VALLEY	CA
Suzanne	James	94574	SAINT HELENA	CA
Susie	Butcher	92880	CORONA	CA
Susans	Bohannan	92706	SANTA ANA	CA
Susanna	Marshland	94707	BERKELEY	CA
Susan	Harris	94609	OAKLAND	CA
Susan	Rautine	93940	MONTEREY /	CA
Susan	Baronoff	90291	VENICE	CA

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susan	fishman		94901	SAN RAFAEL	CA	
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Susan	McKenzie		95722	MEADOW VISTA	CA	
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Susan	Bendixen		94531	ANTIOCH	CA	
Susan	Bailey		92104	SAN DIEGO	. CA	
Susan	Boyden		92029	ESCONDIDO	CA	
susan	carrithers		94102	SAN FRANCISCO	CA	
Susan	Gosland		91765	DIAMOND BAR	CA	
Susan	Denny		95864	SACRAMENTO	CA	
Susan	Peterman		94080	SOUTH SAN FRANCISCO	CA	
Susan	Renfrew		93108	SANTA BARBARA	CA	
Susan	Blanc		94578	SAN LEANDRO	CA	
Susan	Powers		94122	SAN FRANCISCO	CA	
Susan	Perez		94602	OAKLAND	CA	
Susan	Floethe		95035	MILPITAS	CA	
Susan	Brodsky	94303	3-4656			
Susan	Weinberg		90230	CULVER CITY	CA	
Susan	Temple		90808	LONG BEACH	CA	
Susaan	Aram		92651	LAGUNA BEACH	CA	
sunny	williams		95128	SAN JOSE	CA	
Sunni	Farkas		92122	SAN DIEGO	CA	
Summer	Rhee-Pizano		95010	CAPITOLA	CA	
Suha	Noursi		92637	LAGUNA WOODS	CA	
Sue Ann	Lorig		95030	LOS GATOS	CA	
Sue	Hammond		94553	MARTINEZ	CA	
SUE	ROBERTS		95503	EUREKA	CA	
Sue	Perrin		93012	CAMARILLO	CA	
Sue	Goodell		92014	DEL MAR	CA	
Sue	Smiley		91011	LA CANADA FLINTRIDGE	CA	
Subrata	Sircar	9408	7-1205			
Stormy	Li		92503	RIVERSIDE	CA	
Steven	Berl		94611	OAKLAND	CA	
Steven	Wong	95014	4-3015			
Steven	Sugarman		90265	MALIBU	CA	
Steven	Cook		92315	BIG BEAR LAKE	CA	
Steve&Racha	a Alvarez-Jett		90501	TORRANCE	CA	
Steve	Vierra		94577	SAN LEANDRO	CA	

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Steve	Shapiro	95476	SONOMA	CA	
Steve	Claas 9	5014-4650			
Steve	Netti	91910	CHULA VISTA	CA	
Stephanie	Lucchesi	95118	SAN JOSE	CA	
Stephanie	Walker	94022	LOS ALTOS	CA	
Stephanie	Gould	93428	CAMBRIA	CA	
Stephanie	Larro	91367	WOODLAND HILLS	CA	
stephanie	cook	95003	APTOS	CA	
Stephanie	Chalmers, D\	94928	ROHNERT PARK		
Stephanie	Harvey	95901	MARYSVILLE	CA	
Stephanie	Hughes	95969	PARADISE	CA	
Stephanie	Easton	92503	RIVERSIDE	CA	
Stephanie	Nunez	91405	VAN NUYS	CA	
Steffani	LaZier	95726	POLLOCK PINES	CA	
Stefanie	Kaku	93922	CARMEL	CA	
Stefanie	Phan-Thoma:	92651	LAGUNA BEACH	CA	
Stan	Fitzgerald	95135	SAN JOSE	CA	
Stacy	Cornelius	92651	LAGUNA BEACH	CA	
Stacy	Hall	92104	SAN DIEGO	CA	
stacie	сох	90405	SANTA MONICA	CA	
STACIE	CHARLEBOIS	95472	SEBASTOPOL	CA	
Spencer	Adams	90034	LOS ANGELES	CA	
Sonya	Lunder	80305	BOULDER	СО	
Sivan	Siman-Tov	91403	SHERMAN OAKS	CA	
Simoune	В	91387	CANYON COUNTRY	CA	
Sieglinde	Morrent-Swe	90265	MALIBU	CA	
Sidney	Robles	94558	NAPA	CA	
Siddharth	Mehrotra 9	3010-1322			
Sid	Sattler	94602	OAKLAND	CA	
Siara	Edwards	91006	ARCADIA	CA	
shusi	Liao	90048	LOS ANGELES	CA	
Shirley	Maclean	92071	SANTEE	CA	
Shirley	Matulich	93101	SANTA BARBARA	CA	
Shireen	Nickel	3842	HAMPTON	NH	
Sheryl	Rose	94702	BERKELEY	CA	
Sherry	Lopata	91307	WEST HILLS	CA	
Sherrill	Futrell	95618	DAVIS	CA	
Sherrie	Thomas	95831	SACRAMENTO	CA	
Sheri	Watson-Riley	95003	APTOS	CA	
Shellie	Brown	92103	SAN DIEGO	CA	
Shelley	Thomas	92078	SAN MARCOS	CA	
Shelley	Arrowsmith	95476	SONOMA	CA	

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shela	moriarty	90232	CULVER CITY	CA
Sheilaugh	Sebastian	94025	MENLO PARK	CA
Sheila	Morrissey	94954	PETALUMA	CA
Sheen	Rajmaira	93012	CAMARILLO	CA
Shayna	Bailey	93422	ATASCADERO	CA
Shay	Harris	95608	CARMICHAEL	CA
shawn	johnson	92024	ENCINITAS	CA
Sharon	Paltin	95454	LAYTONVILLE	CA
Sharon	Younger	95531	CRESCENT CITY	CA
Sharon	Rubenstein	95249	SAN ANDREAS	CA
Sharon	Reinbott	94611	OAKLAND	CA
Sharon	Calcagno	94132	SAN FRANCISCO	CA
Sharon	Feissel	95409	SANTA ROSA	CA
sharon	lacy	95472	SEBASTOPOL	CA
Sharon	Misik	91008	DUARTE	CA
Sharon	Wick	94965	SAUSALITO	CA
Sharon	Torrisi	90254	HERMOSA BEACH	CA
Sharon	Morris	94541	HAYWARD	CA
Sharon	Scott	90004	LOS ANGELES	CA
Sharon	Johnson	95660	NORTH HIGHLANDS	CA
Sharon	Lebach	94024	LOS ALTOS	CA
Sharon	Colyar	93612	CLOVIS	CA
Sharo	Pollock	96161	TRUCKEE	CA
Shari	Nicsevic	95128	SAN JOSE	CA
Shanovia Nav	Escoe	91012	LA CANADA FLINTRIDGE	CA
Shannon	Rubicam	94612	OAKLAND	CA
sha	davies	96001	REDDING	CA
Seth	Sharp	95945	GRASS VALLEY	CA
sergio	sanchez	91789	WALNUT	CA
Sera	Dancer	95403	SANTA ROSA	CA
Scott	Kaminski	94578	SAN LEANDRO	CA
Scott	Rubel 90033	1-1633		
Scott	Wilson	91362	THOUSAND OAKS	CA
Sattie	Clark	95470	REDWOOD VALLEY	CA
Saskia	Lytle	94574	SAINT HELENA	CA
sarosh	patel	94087	SUNNYVALE	CA
Saran	Kirschbaum	90035	LOS ANGELES	CA
Sarah	Sheets	95338	MARIPOSA	CA
Sarah	Wilkinson	91010	DUARTE	CA
Sarah	Porraz	93402	LOS OSOS	CA
Sarah	В	95060	SANTA CRUZ	CA
Sarah	Murdoch	90272	PACIFIC PALISADES	CA

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Sarah	Zitin	91604 S	STUDIO CITY	CA
Sarah	Carter	94618 C	DAKLAND	CA
Sarah	Kass	94941 N	VILL VALLEY	CA
Sarah	Wildwood	93105 S	SANTA BARBARA	CA
Sarah	Tisher	91406 V	/AN NUYS	CA
Sara	Usher	94602 0	DAKLAND	CA
Sara	Steck	93514 E	BISHOP	CA
Sara	Hayes	90814 L	ONG BEACH	CA
Santosha	Davis	93940 N	MONTEREY	CA
Sandy	Toma	92675 S	SAN JUAN CAPISTRANO	CA
Sandy	Cahan	95608 C	CARMICHAEL	CA
Sandy	Lowder	94611 0	DAKLAND	CA
Sandy	Ridout	92647 H	UNTINGTON BEACH	CA
sandy	killen	94930 F	AIRFAX	CA
Sandro	Moro	94559 N	NAPA	CA
Sandra	Walker	92688 F	RANCHO SANTA MARGARITA	CA
sandra	Pankow	92126 S	SAN DIEGO	CA
Sandra	Pearlmutter	90503 T	FORRANCE	CA
Sandra	Christopher	91505 E	BURBANK	CA
Sandra	Zaninovich	90024 L	OS ANGELES	CA
Sandra	Mardigian	94941 N	VILL VALLEY	CA
Sandra	Larob	90805 L	ONG BEACH	CA
Sandra	Bremner	94958		
Sandra	Lambert	90068 L	OS ANGELES	CA
Samuel	Mossey	95134 S	SAN JOSE	CA
Sally	janavicius	92677 L	AGUNA NIGUEL	CA
Sally	Trader	95954 N	MAGALIA	CA
sally	stanton	90266 N	MANHATTAN BEACH	CA
Sally	Maier	94550 L	IVERMORE	CA
Sally	Howlett	94703 E	BERKELEY	CA
Sadie	Bailey	92648 H	IUNTINGTON BEACH	CA
Sachiko	Halper	94080 S	SOUTH SAN FRANCISCO	CA
Sabrina	Sarne	94526 C	DANVILLE	CA
Sabrina	Napier	92111 S	SAN DIEGO	CA
Sabina	Ubell	94608 E	EMERYVILLE	CA
S	G	91367 V	WOODLAND HILLS	CA
S	Jones	92605 H	HUNTINGTON BEACH	CA
S	Lincoln	90250 H	AWTHORNE	CA
S	Phillips	95409 S	SANTA ROSA	CA
Ryan S.	Davis	91502 E	BURBANK	CA
Ryan	Acebo	94602 0	DAKLAND	CA
Ryan	W.	91786 L	JPLAND	СА

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	Ruth	Shacterman		95628	FAIR OAKS		CA
	Ruth	Finkelstein		94403	SAN MATEO		CA
	Ruth	Sheldon		94005	BRISBANE		CA
	Russell	Radom		93463	SOLVANG		CA
	Rueenfang	Wang		95762	EL DORADO HILLS		CA
	Roz	goldstein		94904	GREENBRAE		CA
	Ross	Heckmann		91006	ARCADIA		CA
	Rosemary	Battaglia		94945	NOVATO		CA
	Rosemary	De Sanna		94904	GREENBRAE		CA
	Rosemary	Jones	95301	-4871			
	Rosemary	Meert		94404	SAN MATEO		CA
	Rosemary	Graham-Garo		90266	MANHATTAN BEAC	Н	CA
	Rosemary	Martin		93102	SANTA BARBARA		CA
	Rosemary	Thompson	93110	)-1936			
	rosemarie	kuhn		93711	FRESNO		CA
	rose-marie	twu		94086	SUNNYVALE		CA
	Rose Ann	Witt		91362	THOUSAND OAKS		CA
	Rose	Henderson		90044	LOS ANGELES		CA
	Rose	Anton		95406	SANTA ROSA		CA
	rose	juarez		90292	MARINA DEL REY		CA
	Rose	Molloy		94960	SAN ANSELMO		CA
	Rosanne	Leeson		94303	PALO ALTO		CA
	Rosanne	Basu		90254	HERMOSA BEACH		CA
	Rosalind	Bresnahan	92405	-2318			
	Rosa	Sa		92336	FONTANA		CA
r	Ronnie	Berman		91423	SHERMAN OAKS		CA
	Ronna	Berezin		95687	VACAVILLE		CA
	RONALDO	VENGCO		95818	SACRAMENTO		CA
	Ronald	Bogin		94530	EL CERRITO		CA
	Ronald	Warren		91206	GLENDALE		CA
	Ronald	Bach		95616	DAVIS		CA
	Ron	Massicotte		94114	SAN FRANCISCO		CA
	Ron	Hansel		91790	WEST COVINA		CA
	Ron	Rattner		94109	SAN FRANCISCO		CA
	Ron	Giddings		93402	LOS OSOS		CA
	Ron	Strochlic		94602	OAKLAND		CA
	Rohana	McLaughlin		94960	SAN ANSELMO		CA
	Roger	Osborne		96003	REDDING		CA
	Rodrigo	Alatriste-Diaz		93277	VISALIA		CA
	Rodger	Reed		90803	LONG BEACH		CA
	Rod	Repp		91706	BALDWIN PARK		CA
	Rochelle	Cippa		95864	SACRAMENTO		CA

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Rochelle	Belove	92625	CORONA DEL MAR	CA		;
Rochelle	Leon	91362	THOUSAND OAKS	CA		
Robyn	Sumners	91601	NORTH HOLLYWOOD	CA		
Robin	Berlin	91604	STUDIO CITY	CA		
Robin	Fleck	90041	LOS ANGELES	CA		
Robin	Pasterski	95670	RANCHO CORDOVA	CA		
robin	gomez	94546	CASTRO VALLEY	CA		
Roberto	Romo	94121	SAN FRANCISCO	CA		
roberta e.	newman	94941	MILL VALLEY	CA		
Roberta	LaFrance	94579	SAN LEANDRO	CA		
Roberta	LaFleur	92707	SANTA ANA	CA		
Roberta	Paniagua	94505	DISCOVERY BAY	CA		
Roberta	Weissglass	93160	SANTA BARBARA	CA		
Roberta	Lewis	94703	BERKELEY	CA	•	
Robert	Thomas	94539	FREMONT	CA		
Robert	Jansen	92804	ANAHEIM	CA		
Robert	Rippner	95928	СНІСО	CA		
Robert	Smithfield	94930	FAIRFAX	CA		
Robert	Wallace	90602	WHITTIER	CA		
Robert	Tornai	96073	PALO CEDRO	CA		
Robert	Dorenstreich	n 94109	SAN FRANCISCO	CA		
Robert	Reed	92651-1870				
Robert	Thornhill	94550-4109				
Robert	Johnson	90245-3259				
Robert	Mammon	94803	EL SOBRANTE	CA		
Robert	Chirpin	91324	NORTHRIDGE	CA		
robert	luke	95603-2823				1
Robert	Glovert	93726	FRESNO	CA		
Robb	de Vournai	94002	BELMONT	CA		
Rob	Clarke	92009	CARLSBAD	CA		
Rita	Minjares	94530	EL CERRITO	CA		
Rita	Montague	95225	BURSON	CA		
Rick	Onorato	94025	MENLO PARK	CA		
Rick	Burns	94952	PETALUMA	CA		
Rick	Sparks	91602	NORTH HOLLYWOOD	CA		
Rick	Yamada	92037	LA JOLLA	CA		
Richard	Isenberg	92805	ANAHEIM	CA		
Richard	Schenck	95457	LOWER LAKE	CA		
Rich	Корр	95630	FOLSOM	CA		
Rich	Holmer	95486	VILLA GRANDE	CA		
Ria	Tanz Kubota	94803-1807				
	COV	90292	MARINA DEL REV	C۸		

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Rhonda	Harmon	91770	ROSEMEAD	CA
Rhiannon	martin	96101	ALTURAS	CA
Renee	Stewart	94510	BENICIA	CA
Renee	Kim	91602	NORTH HOLLYWOOD	CA
Rene	Andersen	95608	CARMICHAEL	CA
Renate	Rzepa	94070	SAN CARLOS	CA
Rena	Estes	94602	OAKLAND	CA
Reilley	mullin	95570	TRINIDAD	CA
Reginald	Stocking	94131	SAN FRANCISCO	CA
Reevyn	Aronson	94061	REDWOOD CITY	CA
Rebecca	Haseleu	94010	BURLINGAME	CA
Rebecca	Wilcox	94708	BERKELEY	CA
Rebecca	Habermann	95124	SAN JOSE	CA
Rebecca	Haseltine	94110	SAN FRANCISCO	CA
Rebecca	Osterlund	95032	LOS GATOS	CA
Rebecca	Nakamura	92021	EL CAJON	CA
Rebecca	Gavaldon	91351	CANYON COUNTRY	CA
Rebeca	Byerley	91773	SAN DIMAS	CA
Rayna	Cooper	90277	REDONDO BEACH	CA
Raymond	Middleton	90066	LOS ANGELES	CA
Raven	Davis-King	95662	ORANGEVALE	CA
Raquel	Carbone	91303	CANOGA PARK	CA
Randy	Gerlach	94014	DALY CITY	CA
Randy	Buchanan	91208	GLENDALE	CA
Randall	Daugherty	98520	ABERDEEN	WA
Randall	Camp	91945	LEMON GROVE	CA
Randall	G.	94703	BERKELEY	CA
RALPH	DRAPER	92029	ESCONDIDO	CA
Raffia	Bufano	94901	SAN RAFAEL	CA
Rae Ann	Del Pozzo	90024	LOS ANGELES	CA
Rachel	Young	94061	REDWOOD CITY	CA
Rachel	Wolf	95060-2244		
Rachel	Ronn	90402	SANTA MONICA	CA
Rachel	Jacobs	90036	LOS ANGELES	CA
Rachel	Gianni	92104	SAN DIEGO	CA
R.	Yamauchi	91364	WOODLAND HILLS	CA
r	taylor	90025	LOS ANGELES	CA
R	Wells	90020	LOS ANGELES	CA
Querido	Galdo	94601	OAKLAND	CA
Quentin	Hancock	95060	SANTA CRUZ	CA
Probyn	Gregory	91042-1449		
Priscilla	Hoke	91724	COVINA	CA

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	Prisca	Gloor	90066	LOS ANGELES	CA
	Pippa	Scott	90402	SANTA MONICA	CA
	Pilar	Romero	92024	ENCINITAS	CA
	pierre	grady	95035	MILPITAS	CA
	Phyllis	Standish	91740	GLENDORA	CA
	Phyllis	Maywhort	90742	SUNSET BEACH	CA
	Phyllis	Chavez	90405-5038		
	Phyllis	Levine	94115	SAN FRANCISCO	CA
	Phillip	Randall	91367	WOODLAND HILLS	СА
	Phillip	Lee	95758	ELK GROVE	CA
	Phillip	Cripps	92234-7932		
	Phil	Johnson	95380	TURLOCK	CA
	Peter	Blied	90631-3519		
	Peter	DeGano	92313	GRAND TERRACE	CA
	pete	keay	94523	PLEASANT HILL	CA
	Pete	Cox	91345	MISSION HILLS	CA
	Perry	Gx	92780	TUSTIN	CA
	perry	brown	95488	WESTPORT	CA
	Percy	Hicks-Severn	91320	NEWBURY PARK	CA
	Penny	Navarro	92111	SAN DIEGO	CA
	Penny	Heintz	95924	CEDAR RIDGE	CA
	Penni	Thorpe	94401	SAN MATEO	CA
	pema	dechen	95033	LOS GATOS	CA
	Pela	Tomasello	95062	SANTA CRUZ	CA
	Pauline	Slagis	95747	ROSEVILLE	CA
	Pauline	Bedford	92252	JOSHUA TREE	CA
	Paula	Rowe	93230	HANFORD	CA
	Paula	Stober	27410	GREENSBORO	NC
	Paula	Sneddon	93953-3602		
	paula	brown	95062	SANTA CRUZ	CA
	Paula	Plotnick	90048	LOS ANGELES	CA
;	Paula	Polito	94043	MOUNTAIN VIEW	CA
	Paula	Ong	94070	SAN CARLOS	CA
	Paula	Bandoni	95662	ORANGEVALE	CA
	Paula	Zerzan	95476-7250		
	Paula	Bayard	93277	VISALIA	CA
	Paul and Katl	Lanctot	95066	SCOTTS VALLEY	CA
	Paul	Van de Riet	92352	LAKE ARROWHEAD	CA
	Paul	Ripley	95062	SANTA CRUZ	CA
	Paul	Capps	90242-2116		
	paul	runion	95005	BEN LOMOND	CA
	Paul	Vesper	94703-1237		

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Patsy	duffin	94577 SAN LEANDRO	CA
Patrick	Williams	94086 SUNNYVALE	CA
Patricia	Frieband	91377 OAK PARK	CA
Patricia	Lewis	93726 FRESNO	CA
patricia	luzi	94109 SAN FRANCISCO	CA
Patricia	Whaley	94605 OAKLAND	CA
Patricia	berry 9268	3-7733	
Patricia	Zylius	95062 SANTA CRUZ	CA
Patricia	Andersen	95018 FELTON	CA
Patricia	Kimball	94121 SAN FRANCISCO	СА
Patricia	Bednash	93591 PALMDALE	CA
Patricia	Wang	91775 SAN GABRIEL	CA
Patricia	Kale	94563 ORINDA	СА
Patricia	Cachopo	95050 SANTA CLARA	CA
Patricia	Stearns	93221 EXETER	СА
Patricia	Compean	94501 ALAMEDA	CA
Patricia	McLean	95959 NEVADA CITY	СА
Patricia	Campbell 9560	2-2042	
PATRICIA	HALL	95467 HIDDEN VALLEY LAKE	СА
Patricia	Seaward, CN	92549 IDYLLWILD	СА
Patrice	Faraclas	95688 VACAVILLE	СА
Pat	Quinn	94563 ORINDA	CA
Pat	Dufau	92673 SAN CLEMENTE	СА
Pat	Blackwell-Ma	94552 CASTRO VALLEY	СА
pat	sax	94610 OAKLAND	CA
Pat	Paul	95628 FAIR OAKS	CA
Pat	Thompson	95678 ROSEVILLE	CA
Pat	Brooks	94703 BERKELEY	СА
Pat	Scholder	95066 SCOTTS VALLEY	СА
Pat	Kellgren	94952 PETALUMA	СА
Parminder	Sidhu	93003 VENTURA	CA
Paris	Marron	90405 SANTA MONICA	СА
Paola	Staeblein	93643 NORTH FORK	СА
Pamela A.	Lowry	94704 BERKELEY	CA
Pamela	Zuppo	94115 SAN FRANCISCO	CA
Pamela	Evans	94552 CASTRO VALLEY	CA
pamela	letourneau	95403 SANTA ROSA	СА
	Stuart	93465 TEMPLETON	СА
Pamela	Juant		
Pamela Pamela	Sibley	94546 CASTRO VALLEY	CA
Pamela Pamela Pamela	Sibley Scott	94546 CASTRO VALLEY 92014 DEL MAR	CA CA
Pamela Pamela Pamela Pamela	Sibley Scott Hansen	94546 CASTRO VALLEY 92014 DEL MAR 92592 TEMECULA	CA CA CA

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Pamela	Scott	95006	BOULDER CREEK	CA	
Pamela	Merten	90505	TORRANCE	CA	
Pam	Larkin	94550	LIVERMORE	CA	
Pam	Plummer	90808	LONG BEACH	CA	
Р	Wexler	91406	VAN NUYS	CA	
Р	Sanchez	95060	SANTA CRUZ	CA	
Ossie	Sharon	94043	MOUNTAIN VIEW	CA	
Ormand	Tegland	92314	BIG BEAR CITY	CA	
Omar	Mian	95765	ROCKLIN	CA	
Olivia	Locatelli	95003	APTOS	CA	
Oliver	Kaufmann	94957	ROSS	CA	
Ocean	McKinney	91711	CLAREMONT	CA	
Norma	Bozzini	94402	SAN MATEO	CA	
Norma	Gaertner	92029	ESCONDIDO	CA	
Nora	Oliver	91011	LA CANADA FLINTRIDGE	CA	
Nora	Roman	94110	SAN FRANCISCO	CA	
Nona	Refi	94706	ALBANY	CA	
Noah	Schillo	95060	SANTA CRUZ	CA	
Nirupam	Singh	94941	MILL VALLEY	CA	
ninh	giap	92130	SAN DIEGO	CA	
Nina	Komniey	92124	SAN DIEGO	CA	
Nicole	Saucerman	91106	PASADENA	CA	
Nicole	Arbabzadeh	93730	FRESNO	CA	
Nicole	Westheimer	90049	LOS ANGELES	CA	
Nicola	Levine	92203	INDIO	CA	
Nickolas	Potocic	90069	WEST HOLLYWOOD	CA	
Nicholas	Lenchner	95403	SANTA ROSA	CA	
Neil	Cardew-Fanr	n <b>95714</b>	DUTCH FLAT	CA	
Neil	Morgan	90505	TORRANCE	CA	
Neal	Steiner	90034	LOS ANGELES	CA	
natasha	zabriskie	94577	SAN LEANDRO	CA	
Natalie	Blasco	96007	ANDERSON	CA	
Natalie	Audage	95618	DAVIS	CA	
Natalia	Becerra	94566	PLEASANTON	CA	
Natale	Majkut	92110	SAN DIEGO	CA	
Naomi	Mickelson	95124	SAN JOSE	CA	
Naomi	Zuckerman	95589	WHITETHORN	CA	
Nanda	Coleman	95130	SAN JOSE	CA	
Nancy	Eisman	94937	INVERNESS	CA	
Nancy	Hiestand	95616	DAVIS	CA	
Nancy	Murphy	94501	ALAMEDA	CA	
Nancy	Heck	93454-6648			

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x	Nancy	Helgeson	92111 SAN DIEGO	CA
	Nancy	Petitti	91941 LA MESA	CA
	nancy	rapp	94019 HALF MOON BAY	CA
	Nancy	Polito	95662 ORANGEVALE	CA
	Nancy	Gillis	91607 VALLEY VILLAGE	CA
	Nancy	Frazier	90042 LOS ANGELES	CA
	Nancy	Gruenberger	93454 SANTA MARIA	CA
	Nancy	Lemke	91902 BONITA	CA
	Nancy	Parker	94709 BERKELEY	CA
	Nancy	Castillo	90660 PICO RIVERA	CA
	Nancy	Hill	92008 CARLSBAD	CA
	Nancy	Davies	93023 OJAI	CA
	Nancy	Ibarra	91364 WOODLAND HILLS	CA
	nancy	traer	91711 CLAREMONT	CA
	Nancy	Williams	92019 EL CAJON	CA
	Nancy	Cook	94523 PLEASANT HILL	CA
	Nancy	Withington	93103 SANTA BARBARA	CA
	Nancy	Peterson	95066 SCOTTS VALLEY	CA
	Nancy	Lizza	90046 LOS ANGELES	CA
	Nancy	Rossi	91030 SOUTH PASADENA	CA
	Nancy	Balassi	94501 ALAMEDA	CA
	Nancy	Воусе	94903 SAN RAFAEL	CA
	Nancy	Herzog	93449 PISMO BEACH	CA
	Nancy	Кеу	93551 PALMDALE	CA
	Nancy	Price	95616 DAVIS	CA
	Nancy	Helt	92114 SAN DIEGO	CA
	Nagisa	VanVliet	94551 LIVERMORE	CA
	Nadya	Tichman	94602 OAKLAND	CA
	Nadine	Leonova	90292 MARINA DEL REY	CA
	Nadia	Ott	94531 ANTIOCH	CA
	N.Davida	Rabb	94010 BURLINGAME	CA
	n	kaluza	94803 EL SOBRANTE	CA
	Ν	Barrett	92832 FULLERTON	CA
	Ν	W	95949 GRASS VALLEY	CA
	myrna	freeman	93643 NORTH FORK	CA
	Morgana	Taylor	92026 ESCONDIDO	CA
	morgan	mcelroy	92677 LAGUNA NIGUEL	CA
	Monique	Mamikunian	90025 LOS ANGELES	CA
	Monider	DeMars	94541 HAYWARD	CA
	monica	vallejos clark	94534 FAIRFIELD	CA
	Monica	Clark	94583 SAN RAMON	CA
	Monica	Greene	94403 SAN MATEO	CA

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Monica	Simpson	92037 LA JOLLA	CA
Monica	Pielage	95062 SANTA CRUZ	CA
monica	romero	94121 SAN FRANCISCO	CA
Mona	Lisa	95973 CHICO	CA
Mona	Tawatao	95817 SACRAMENTO	CA
Molly	Сох	94087 SUNNYVALE	CA
molly	munz	95608 CARMICHAEL	CA
Molly	Lynch	92118 CORONADO	CA
Mk	Young	95758 ELK GROVE	CA
Mitra	Omana	90049 LOS ANGELES	СА
Mirta	Luque	95138 SAN JOSE	CA
Miriam	Baum	91701 RANCHO CUCAMONGA	CA
Miriam	Hochberg	92122 SAN DIEGO	CA
Miranda	Leiva	91423 SHERMAN OAKS	CA
miranda	train	90291 VENICE	CA
mira	bolsakov	92691 MISSION VIEJO	CA
Mima	Arroyo	94577 SAN LEANDRO	CA
Mike	Caetano	93704 FRESNO	CA
Mike	Dummer	92084 VISTA	CA
mike	williams	94941 MILL VALLEY	CA
Mika	Walton	91001 ALTADENA	CA
mihaela	stir	94522 CONCORD	CA
miguel	rojas	92029 ESCONDIDO	CA
Mickey	Graves	94965 SAUSALITO	CA
Michelle	Gessner	95747 ROSEVILLE	CA
Michelle	Angelini	90027 LOS ANGELES	CA
Michelle	Baik	92821 BREA	CA
Michelle	Barbour	91301 AGOURA HILLS	CA
Michele	Santoro	95616 DAVIS	CA
Michal	Lynch	93111 SANTA BARBARA	CA
Michaele	Belles	92647 HUNTINGTON BEACH	CA
Michael C.	FcRichard B. M	95076 WATSONVILLE	CA
Michael	Talbot	94901 SAN RAFAEL	CA
Michael	Garitty	95959 NEVADA CITY	CA
Michael	Eichenholtz 948	304-5125	
Michael	Bordenave	93728 FRESNO	CA
Michael	Essex	95762 EL DORADO HILLS	CA
Michael	Henderson	92649 HUNTINGTON BEACH	CA
Michael	Keusch	90039 LOS ANGELES	CA
Michael	McGee	93401 SAN LUIS OBISPO	CA
michael	boshears	92325 CRESTLINE	CA
Michael	Cannon	94596 WALNUT CREEK	CA

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	Michael	Kemper	941	L09	SAN FRANCISCO	CA
	MICHAEL	BRENNAN	921	L07	SAN DIEGO	CA
	Michael	White	90059-34	00		
	Michael	Albanese	913	352	SUN VALLEY	CA
	Michael	Miller	940	)44	PACIFICA	CA
	Micah	Breede	950	060	SANTA CRUZ	CA
	Meteka	Bullard	903	305	INGLEWOOD	CA
	Merriman	Mathewson	941	L11	SAN FRANCISCO	CA
	Meridith	Jones	913	361	WESTLAKE VILLAGE	CA
	Melvyn	Nefsky	902	292	MARINA DEL REY	CA
	Melvin	Taylor	958	323	SACRAMENTO	CA
	Melva	Freeman	949	928	ROHNERT PARK	CA
	Melodie	Chrislock	939	923	CARMEL	CA
	Melissa	Polick	949	941	MILL VALLEY	CA
	Melissa	Davis	945	568	DUBLIN	CA
	Melissa	Maigler	944	104	SAN MATEO	CA
	melissa	miller	945	523	PLEASANT HILL	CA
	Melissa	Vasconcellos	930	003	VENTURA	CA
	Melinda	Ebey	949	903	SAN RAFAEL	CA
	melinda	benedek	90077-28	27		
	Melinda	Isaacson	913	367	WOODLAND HILLS	CA
	Melanie	Jones	907	731	SAN PEDRO	CA
	Melanie	Pennock	945	526	DANVILLE	CA
	Melanie	Landsberg	904	102	SANTA MONICA	CA
	Melanie	Marshall	940	)85	SUNNYVALE	CA
	Melanie	Ott	940	)87	SUNNYVALE	CA
	mel	marcus	908	308	LONG BEACH	CA
	Megan	Sibigtroth	948	304	RICHMOND	CA
	Megan	Kaun	954	104	SANTA ROSA	CA
	Meg	McCrea	951	125	SAN JOSE	CA
	Maxine	Chadwick	931	105	SANTA BARBARA	CA
	Maxine	Cain	910	001	ALTADENA	CA
	Maureen	Horner	934	149	PISMO BEACH	CA
	Maureen	Barrio	930	003	VENTURA	CA
	Maureen	Earl	950	)65	SANTA CRUZ	CA
	Maureen	Crowe	941	133	SAN FRANCISCO	CA
	Matthew	Davila	953	355	MODESTO	CA
	Matthew	Reis	90046-30	87		
	Matthew	Owen	911	107	PASADENA	CA
	Matthew	Palmer	908	308	LONG BEACH	CA
	Matthew	Albracht	946	518	OAKLAND	CA
1	Matt	Richardson	941	123	SAN FRANCISCO	CA

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matt	woodward	90740	SEAL BEACH	CA
mathilde	fallot	90066	LOS ANGELES	CA
Marylyn	Gardner	95135	SAN JOSE	CA
Marylucia	Arace	92835	FULLERTON	CA
Maryla	Wade	95604	AUBURN	CA
MaryAnne	Glazar	94704	BERKELEY	CA
MARYANN	OTTER	93420	ARROYO GRANDE	CA
Mary W.	Schuppert	95003	APTOS	CA
Mary Sue	Meads	94611	OAKLAND	CA
Mary Sue	Abernethy	93923	CARMEL	' CA
Mary	Gill	94305	STANFORD	CA
mary	Jaklevick	90807	LONG BEACH	CA
Mary	Anderson	92064	POWAY	CA
Mary	Steele	92677	LAGUNA NIGUEL	CA
Mary	Rooney	95476	SONOMA	CA
Mary	Kowalski	94040	MOUNTAIN VIEW	CA
Mary	Kovach	92111	SAN DIEGO	CA
MARY	ROJESKI	90405	SANTA MONICA	CA
Mary	Novasic	94118	SAN FRANCISCO	CA
Mary	Roosevelt	94708	BERKELEY	CA
mary	sherman	94965	SAUSALITO	CA
Mary	Riblett	90230	CULVER CITY	CA
Mary	Hicklin	92117	SAN DIEGO	CA
Mary	Jensen	96003	REDDING	CA
Mary	Lopez	95610	CITRUS HEIGHTS	CA
Mary	Tilton	92624	CAPISTRANO BEACH	CA
Mary	Bobadilla	94509	ANTIOCH	CA
Mary	Owens	95822-3317		
marty	templeton	90807	LONG BEACH	CA
Martina	Albers	92629	DANA POINT	CA
Martina	Hopkins	93907	SALINAS	CA
Martin	Diedrich	92627	COSTA MESA	CA
Martin	Hykin	90290	TOPANGA	CA
Martin	Saitta	92115	SAN DIEGO	CA
Martin	Kantor	92106	SAN DIEGO	CA
Marti	Wallace	95608	CARMICHAEL	CA
Martha	Land	94518-1324		
Martha	Dragoo	95932-3030		
Martha	Lyons	89027	MESQUITE	NV
Martha	Goldin	94118	SAN FRANCISCO	CA
martha	freeman	94501	ALAMEDA	CA
Martha	Somers-Seka	95461	MIDDLETOWN	CA

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Martha	Haber		90808	LONG BEACH	CA
martha	mangis		96017	CASTELLA	CA
Marshal	McKitrick		95822	SACRAMENTO	CA
Marsha	Hamacher		94505	DISCOVERY BAY	CA
Marsha	Jarvis		94564	PINOLE	CA
Marsha	Matsuura		94702	BERKELEY	CA
Marsha	Andersen	92646	5-3829		
Marmura	Lee		92804	ANAHEIM	CA
Marlon	Puckett		91505	BURBANK	CA
Marlene	Coury		95003	APTOS	CA
Marle	Vane		95831	SACRAMENTO	CA
Marla	Azriel		94087	SUNNYVALE	CA
Mark	Cappetta		92270	RANCHO MIRAGE	CA
Mark	Slate	94901	L-1001		
Mark	Weller		95064	SANTA CRUZ	CA
Mark	Lecker		94611	OAKLAND	CA
Mark	Bartleman		92651	LAGUNA BEACH	CA
Mark	DiMaria	90034	1-1938		
Mark	Lolli		92019	EL CAJON	CA
Mark	Locke		93063	SIMI VALLEY	CA
Mark	Beckwith		94703	BERKELEY	CA
Mark	Z		91744	LA PUENTE	CA
Mark	Garcia		94805	RICHMOND	CA
Marjorie	Carroll		93285	WOFFORD HEIGHTS	CA
Marjorie	Grace-Sayers		90034	LOS ANGELES	CA
Marita	Kubersky		95472	SEBASTOPOL	CA
Marisa	Capela		92284	YUCCA VALLEY	CA
Mario	Lopez		93232	HANFORD	CA
Marina	Mackin		94066	SAN BRUNO	CA
Marilynn	Russell		95407	SANTA ROSA	CA
Marilyn	Price		94941	MILL VALLEY	CA
Marilyn	Fuller		95033	LOS GATOS	CA
marilyn	greenberg		93923	CARMEL	CA
Marilyn	Veltrop		95073	SOQUEL	CA
Marilyn	Grimes		92126	SAN DIEGO	CA
marilyn	weirich		94805	RICHMOND	CA
Marilyn	Shepherd		95570	TRINIDAD	CA
Marilyn	Griffiths		95121	SAN JOSE	CA
Marilyn	Perona		92637	LAGUNA WOODS	CA
Marilena	Silbey		94978	FAIRFAX	CA
Marie	Kerpan		94941	MILL VALLEY	CA
Marie	Thomas		91791	WEST COVINA	CA

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Marie	McCall	92557	MORENO VALLEY	CA
Marianne	heames	92555	MORENO VALLEY	CA
Marianne	Gilles	94941	MILL VALLEY	CA
Maria Carme	e Maldonado เ	. 91342	SYLMAR	CA
Maria	Vasquez	95825	SACRAMENTO	CA
maria	Simpson	92808	ANAHEIM	CA
Maria	Cardenas	91702	AZUSA	CA
Maria	Veghte	92166	SAN DIEGO	CA
maria	ruiz	94949	NOVATO	CA
Mari	Vlastos	94708	BERKELEY	CA
Margy	Lundstrom	94534	FAIRFIELD	CA
Margueritte	Hillman	90043	LOS ANGELES	CA
Marguerite	Shuster	91024	SIERRA MADRE	CA
Marguerite	Dessornes	91104	PASADENA	CA
Margo	Hebald	92101	SAN DIEGO	CA
Margo	Cole	95684	SOMERSET	CA
Margarite	Reynolds	94107	SAN FRANCISCO	CA
Margaret	Talbot	94602	OAKLAND	CA
Margaret	Toomay	95037	MORGAN HILL	CA
margaret	keon	94904	GREENBRAE	CA
Margaret	Wilhelm	92325	CRESTLINE	CA
Margaret	Mortimore	91208	GLENDALE	CA
Margaret	Dreyfus	94596	WALNUT CREEK	CA
Marcia	Tyriver	95409-5913		
Marcia	Granucci	94062	REDWOOD CITY	CA
Marc	Silverman	90068-3071		
Mara	Williams	98245	EASTSOUND	WA
manuela	calhoun	94116	SAN FRANCISCO	CA
Manmeet	toor	90024	LOS ANGELES	CA
mandy	sackett	92107	SAN DIEGO	CA
Mandy	Barre	92054	OCEANSIDE	CA
Mana-Jean	Wagnon	94501	ALAMEDA	CA
Malc	Moore	96122	PORTOLA	CA
Maimoona	Ahmed	94521	CONCORD	CA
MAIA	BALLIS	93711	FRESNO	CA
Madeline	Richards	95437	FORT BRAGG	CA
Madeline	Doucas	94551-1746		
Madeline	Coleman	95030	LOS GATOS	CA
Madeleine	Krois	94122	SAN FRANCISCO	CA
M.M.	McGuire	93452	SAN SIMEON	CA
M. Virginia	Leslie	95035	MILPITAS	CA
M.	Canter	94920	BELVEDERE TIBURON	CA

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М.	DiSuvero		94117	SAN FRANCISCO	CA
м.	Schad		95616	DAVIS	CA
М	Lee		95207	STOCKTON	CA
М	Besselievre		92879	CORONA	CA
m	а		94070	SAN CARLOS	CA
М	Steere		95436	FORESTVILLE	CA
Lynne	Sgambati		95501	EUREKA	CA
Lynne	Preston		94107	SAN FRANCISCO	CA
Lynne	Colvig		92276	THOUSAND PALMS	CA
Lynne	Grant		94018	EL GRANADA	CA
Lynne	Israel		93109	SANTA BARBARA	CA
Lynn	Finkelstein		94901	SAN RAFAEL	CA
Lynn	Freck		93013	CARPINTERIA	CA
Lynn	Roof		90209	BEVERLY HILLS	CA
Lynn	Gardner	93536	5-7302		
Lynn	Taylor		94070	SAN CARLOS	CA
Lynn	Rich		95209	STOCKTON	CA
lynn	Anderson		92108	SAN DIEGO	CA
lynn	marcus		93940	MONTEREY	CA
Lynn	Court		95658	NEWCASTLE	CA
Lynette	Ridder		94521	CONCORD	CA
Lynda	Cicciari		93063	SIMI VALLEY	CA
Lynda	Dennehy		90241	DOWNEY	CA
Lynda	Aubrey		95432	ELK	CA
Lyn	Goldinger		90230	CULVER CITY	CA
Luz	Vazquez		90038	LOS ANGELES	CA
Lula	Shoberg		95116	SAN JOSE	CA
luke	k		94608	EMERYVILLE	CA
Lucinda	Arntson		92070	SANTA YSABEL	CA
Lucinda	Сох		94590	VALLEJO	CA
lu	carpenter		94131	SAN FRANCISCO	CA
Lovetta	Burns	93560	)-6849		
LouRene	Fitzsimmons		96122	PORTOLA	CA
Lourdes	Martinez		95403	SANTA ROSA	CA
Louise	McGuire		94519	CONCORD	CA
Louise	Zimmer		93446	PASO ROBLES	CA
Louis	Salerno		94501	ALAMEDA	CA
Lorraine	Reade		92028	FALLBROOK	CA
Lorraine	King		95762	EL DORADO HILLS	CA
Lorna	Farnum		90720	LOS ALAMITOS	CA
Lori	Ortiz		95125	SAN JOSE	CA
Lori	Welch		94523	PLEASANT HILL	CA

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Lori	Plyler	91350	SANTA CLARITA	CA
Lori	Sturiza	95677	ROCKLIN	CA
Lori	Isaacs '	92648	HUNTINGTON BEACH	CA
Lori	Lertzman	91367	WOODLAND HILLS	CA
Lori	Johnston	95821	SACRAMENTO	CA
Lori	Lo Faso	92677	LAGUNA NIGUEL	CA
Lori	Whitney	95252	VALLEY SPRINGS	CA
Lori	Kreinbring	91730-3466		
Lois and Don	Eidam	95628	FAIR OAKS	CA
Lois	Klepin	91911	CHULA VISTA	CA
logan	cartwright	95062	SANTA CRUZ	CA
LLOYD	DENT	91324	NORTHRIDGE	CA
Llauren	Peralta	90042	LOS ANGELES	CA
Liya	Schwartzmar	95820	SACRAMENTO	CA
Lise	Brooke	95018	FELTON	CA
Lisa J.	Spencer	95602	AUBURN	CA
Lisa	Zito	93657	SANGER	CA
lisa	giacomi	90703	CERRITOS	CA
Lisa	Elsea	92107	SAN DIEGO	CA
lisa	s. leong	95060	SANTA CRUZ	CA
Lisa	Stempka	92128	SAN DIEGO	CA
Lisa	Brahney	94549	LAFAYETTE	CA
Lisa	Whitefield	93063	SIMI VALLEY	CA
Lisa	Almendarez-	92586	SUN CITY	CA
Lisa	Farmer	94117	SAN FRANCISCO	CA
Lindy	Cumberland	92264	PALM SPRINGS	CA
Lindsey	McConaghy	93401	SAN LUIS OBISPO	CA
lindsay	triehy	90045	LOS ANGELES	CA
lindsay	smith dixon	90069	WEST HOLLYWOOD	CA
Linda	Ferguson	95608	CARMICHAEL	CA
Linda	Johnson	94401-3658		
Linda	Burkhart	93230	HANFORD	CA
Linda	Тоу	94901	SAN RAFAEL	CA
Linda	Gee	94578	SAN LEANDRO	CA
Linda	Schmid	94043	MOUNTAIN VIEW	CA
Linda	Wakeley	95747	ROSEVILLE	CA
Linda	Howie	97224	PORTLAND	OR
Linda	Wood	94706	ALBANY	CA
Linda	Fitzgerald	95746	GRANITE BAY	CA
Linda	lsenhart	95409	SANTA ROSA	CA
Linda	Garza	94551	LIVERMORE	CA
linda	gibboney	91423	SHERMAN OAKS	CA

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Linda	Lindsay	96160	TRUCKEE	CA
Linda	Stein	94610	OAKLAND	CA
Linda	Sebastian	91902	BONITA	CA
Linda	Pierce	94901	SAN RAFAEL	CA
LINDA	WALDRON	93555-8100		
Linda	Krieg	94061	REDWOOD CITY	CA
Linda	Ford	92648	HUNTINGTON BEACH	CA
Linda	Klein	90245-3259		
Linda	Riley	94566	PLEASANTON	CA
Linda	Williams	95864	SACRAMENTO	CA
Linda	Mellen	92661-1434		
Linda	Osnes	95354	MODESTO	CA
Linda	Bodian	94930	FAIRFAX	CA
Linda	Frankel	94578	SAN LEANDRO	CA
Linda	Malone	94551	LIVERMORE	CA
Linda	Holloway	90012	LOS ANGELES	CA
Linda	Jaso	93465	TEMPLETON	CA
Lina	Hannigan	94501	ALAMEDA	CA
Lin	Griffith	94619	OAKLAND	CA
Lillian	Montesano	91607	VALLEY VILLAGE	CA
Lillian	Morse	90212	BEVERLY HILLS	CA
liliya	telishevsky	91302	CALABASAS	CA
Lia	Ortega	92111	SAN DIEGO	CA
Leslie	Pierce	92102	SAN DIEGO	CA
Leslie	Hickcox	92057	OCEANSIDE	CA
leslie	spoon	93402	LOS OSOS	CA
Leslie	Marlowe	95052	SANTA CLARA	CA
Leslie	Moody	91387	CANYON COUNTRY	CA
Leslie	Hutchinson	96022	COTTONWOOD	CA
Leslie	Sheridan	95422	CLEARLAKE	CA
les	roberts	93704	FRESNO	CA
Leonie	de Picciotto	90291	VENICE	CA
Leonardo	Garcia	94611	OAKLAND	CA
Lena	Van Leeuwer	· 94563	ORINDA	CA
Leigh Ann	DiCarlo	92596	WINCHESTER	CA
Leigh	Jewell	91350	SANTA CLARITA	CA
Leigh	Clark	91344-6858		
Lee	Harrison	93004-2025		
Lee	Slocum	90068	LOS ANGELES	CA
lee	jordan	90056	LOS ANGELES	CA
LEE	MITCHELL	94707	BERKELEY	CA
Lee	Keller	92057	OCEANSIDE	CA

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Lee	Robinson	95762	EL DORADO HILLS	CA
Leanna	Sweeters	95648	LINCOLN	CA
Lea	Yancey	94602	OAKLAND	CA
Laurie	Staschik	91377	OAK PARK	CA
Laurie	Pittman	91711-1411		
Laurie	Cohen	94941	MILL VALLEY	CA
Laurie	Vann	95670	RANCHO CORDOVA	CA
Lauren	Leonarduzzi	95020	GILROY	CA
Lauren	Linda	92637	LAGUNA WOODS	CA
Lauren	Murdock	93110	SANTA BARBARA	CA
Lauren	Schiffman	94530	EL CERRITO	CA
Laurel	Morris Wess	l 94965	SAUSALITO	CA
Laurel	Beyrer	92506	RIVERSIDE	CA
Laurel	Berman	90068	LOS ANGELES	CA
Laurel	Kellogg	96003	REDDING	CA
Laurel	Tucker	91711	CLAREMONT	CA
Laurel	Brewer	90069	WEST HOLLYWOOD	CA
Laura	Mullins	91361	WESTLAKE VILLAGE	CA
Laura	Stuck	94601	OAKLAND	CA
Laura	Collins	94901	SAN RAFAEL	CA
Laura	Marinelli	90034	LOS ANGELES	CA
Laura	Hough	90034	LOS ANGELES	CA
Laura	Davis	90026	LOS ANGELES	CA
LAURA	LEIPZIG	94702	BERKELEY	CA
Laura	Flores	91205	GLENDALE	CA
Laura	Sy	95614	COOL	CA
Laura	Koeninger	95482	UKIAH	CA
Laura	Olivares	91331	PACOIMA	CA
Laura	Huhn	94923	BODEGA BAY	CA
Laura	Agyeman	92129	SAN DIEGO	CA
Laura	Bajek	92009	CARLSBAD	CA
Laura	Sullivan	95503	EUREKA	CA
Lau	langham	95827	SACRAMENTO	CA
Larry	LaPointe	92589	TEMECULA	CA
Larry	Daniell	95132	SAN JOSE	CA
Larry	Anthony	92354	LOMA LINDA	CA
Lara	Abrams	40509	LEXINGTON	KY
Lanis	LeBaron	95947	GREENVILLE	CA
Lanelle	Lovelace	95310	COLUMBIA	CA
Lance	Robert	92101	SAN DIEGO	CA
Lana	Touchstone	94591	VALLEJO	CA
lainy	parry	90405	SANTA MONICA	CA

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L	Ferber	92075	SOLANA BEACH	CA
L	Tiefen	90265	MALIBU	CA
L	Nelson	95038	MORGAN HILL	CA
L	Lilles	94030	MILLBRAE	CA
Kyle	Becchetti	92020	EL CAJON	CA
Kurt	Speidel	92673	SAN CLEMENTE	CA
Kristy	Rotermund	95959	NEVADA CITY	CA
Kristine	Herzog	94612	OAKLAND	CA
Kristina	Razmara	94158	SAN FRANCISCO	CA
Kristina	Ustayan	91201	GLENDALE	CA
kristin	smith	90272	PACIFIC PALISADES	CA
Kristin	Michaels	94602	OAKLAND	CA
Kristie	Portman	91381	STEVENSON RANCH	CA
Kristen	Leckrone	95032	LOS GATOS	CA
kristen	hoegee	91206	GLENDALE	CA
Krista	Bogart	94595	WALNUT CREEK	CA
kris	liang	94038	MOSS BEACH	CA
Коа	Pickering	94973	WOODACRE	CA
Kit	Ebert	94015	DALY CITY	CA
Kirsten	Fasching	94949	NOVATO	CA
Kirstan	Lessman	92024	ENCINITAS	CA
kira	durbin	91411	VAN NUYS	CA
Kimberly	Warwick	90232	CULVER CITY	CA
Kimberly	Hazard	94803	EL SOBRANTE	CA
Kimberly	Halizak	90068	LOS ANGELES	CA
Kimberly	Rouse	92103	SAN DIEGO	CA
Kimberly	Bliss	92373	REDLANDS	CA
Kimball	Hurd	95004-9713		
Kim	Feldman	94901-2697		
Kim	Walker	94611	OAKLAND	CA
Kim	Huntingdon	22551	SPOTSYLVANIA	VA
Kim	Huntingdon	95827	SACRAMENTO	CA
Kim	Grobeck	95762	EL DORADO HILLS	CA
Kim	Nakata	91106	PASADENA	CA
Kim	Harmon	94945	NOVATO	CA
Kim	Villa	95404	SANTA ROSA	CA
Kim	Thoman	94608	EMERYVILLE	CA
Kiku	Dong	94588	PLEASANTON	CA
Kevin	Schader	94523	PLEASANT HILL	CA
Kevin	Hearle, Ph.D	. 94402	SAN MATEO	CA
Kevin	Patterson	94595	WALNUT CREEK	CA
Kevin	Slauson	94501	ALAMEDA	CA

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Ketsa	Osborne	95818	SACRAMENTO	CA
Kerry	Johnson	94551	LIVERMORE	CA
Kerry	Emery	95006-9329		
Kerri	Anthony	94904	GREENBRAE	CA
Kerna	Trottier	94705	BERKELEY	CA
Kenneth	Althiser	92223	BEAUMONT	CA
Ken	Novak	94303	PALO ALTO	CA
Ken	Fischer	94933	FOREST KNOLLS	CA
Ken	stein	91360	THOUSAND OAKS	CA
Ken	Cook	94960	SAN ANSELMO	CA
kelly	beale	92610	FOOTHILL RANCH	CA
Kelly	Maney	90212	BEVERLY HILLS	CA
Kelly	Bonanno	91362	THOUSAND OAKS	CA
Kelly	Ray	92268	PIONEERTOWN	CA
Kelly	Carter	92404	SAN BERNARDINO	CA
Keely	Tongate	94530	EL CERRITO	CA
Keelin	Pohl	94903	SAN RAFAEL	CA
Kcarolina	Christensen	95971	QUINCY	CA
Kazuko	Mitose	92124	SAN DIEGO	CA
Kaysie	Kent	90405	SANTA MONICA	CA
Kay	Schaser	95501	EUREKA	CA
Кау	Mitchell	92003	BONSALL	CA
kay	gallin	90064	LOS ANGELES	CA
katy	cheung	95014	CUPERTINO	CA
Katie	Spurlock	94108	SAN FRANCISCO	CA
Katie	Turner	92617	IRVINE	CA
Kathy	Jackson	95682	SHINGLE SPRINGS	CA
Kathy	S	94596	WALNUT CREEK	CA
Kathy	Weaver	96087	SHASTA	CA
kathy	sartain	95945	GRASS VALLEY	CA
Kathy	Kerridge	94510	BENICIA	CA
Kathy	Kosinski	93117	GOLETA	CA
Kathy	Skaggs	94087	SUNNYVALE	CA
Kathy	Hamrick	93449	PISMO BEACH	CA
Kathy	Lockridge	92028	FALLBROOK	CA
Kathy	Popoff	90732-2272		
Kathy	Grant	95959	NEVADA CITY	CA
Kathryn	Carroll	94611	OAKLAND	CA
Kathryn	Santana	91008	DUARTE	CA
Kathryn	Everling	93427	BUELLTON	CA
Kathryn	Gould	92084	VISTA	CA
Kathleen	Barrett	93010	CAMARILLO	CA

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Kathleen	Kaiser	95928	CHICO	CA	
Kathleen	Hutchins	95746-9314			
Kathleen	Pavao	94118	SAN FRANCISCO	CA	
Kathleen	Hallal	92603	IRVINE	CA	
Kathleen	Hopkins	94610	OAKLAND	CA	
Kathleen	Hynes	94109	SAN FRANCISCO	CA	
Kathleen	Duket	93705	FRESNO	CA	
Kathleen	Ryan	90712	LAKEWOOD	CA	
Kathleen	Kuczynski	92630	LAKE FOREST	CA	
Kathleen	Burns	95618	DAVIS	CA	
Kathleen	Ferguson	96003	REDDING	CA	
Kathleen	Powell	94590	VALLEJO	CA	
Kathleen	Redmond	94038	MOSS BEACH	CA	
Kathleen	Davis	91750	LA VERNE	CA	
Kathleen	Fleming	94501	ALAMEDA	CA	
Kathleen	Walton	94941	MILL VALLEY	CA	
Katherine	Boswell	95032	LOS GATOS	CA	
Katherine	Figuracion	94563	ORINDA	CA	
Katherine	Nolan	95014	CUPERTINO	CA	
Katherine	Prince	90019	LOS ANGELES	CA	
Katherine	Falco	90094	PLAYA VISTA	CA	
Katherine	Dillon	94709	BERKELEY	CA	
Katherine	Burrelsman	93117	GOLETA	CA	
kath	mcgaughey	96160	TRUCKEE	CA	
Kate	Simon	95642	JACKSON	CA	
Kate	Leiva	94114	SAN FRANCISCO	CA	
kate	nyne	94601	OAKLAND	CA	
Kate	Ague	94025	MENLO PARK	CA	
Katarina	Wittich	90065	LOS ANGELES	CA	
Kat	Stephens	95409	SANTA ROSA	CA	
Kat	Braden	92625	CORONA DEL MAR	CA	
kasia	leavitt	93023	OJAI	CA	
Karsten	Mueller	95060	SANTA CRUZ	CA	
Karla	Devine	90266	MANHATTAN BEACH	CA	
Karla	Cheris	94116	SAN FRANCISCO	CA	
Karl	Lohrmann	90245	EL SEGUNDO	CA	
Karina	Schmidt	92081	VISTA	CA	
Karin	Quinn	92677	LAGUNA NIGUEL	CA	
Kari	Tsubota	94606	OAKLAND	CA	
kari	millette	95831	SACRAMENTO	CA	
Kari	Garcia	94089	SUNNYVALE	CA	
Karen A	Martinez	94510	BENICIA	CA	

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Karen	Berger	91020	MONTROSE	CA
karen	steele	95501	EUREKA	CA
Karen	Jackson	91607-1516		
Karen	Alexander	95476	SONOMA	CA
Karen	Schaefer	91711-3521		
Karen	Eikeland	94501	ALAMEDA	CA
Karen	Ekema	93221	EXETER	CA
Karen	Ratzlaff	95404	SANTA ROSA	CA
Karen	Clark	93003	VENTURA	CA
Karen	Toscos	94027	ATHERTON	CA
Karen	Thurston	91011	LA CANADA FLINTRIDGE	CA
Karen	Donaldson	95945	GRASS VALLEY	CA
Karen	Ibarra	91910	CHULA VISTA	CA
Karen	Davies	93704	FRESNO	CA
karen	camp	91607	VALLEY VILLAGE	CA
karen	justis	94105	SAN FRANCISCO	CA
Karen	Smit	95928	CHICO	CA
Karen	Johnson	92653	LAGUNA HILLS	CA
karen	rudnick	93401	SAN LUIS OBISPO	CA
Karen	Alcock	95404	SANTA ROSA	CA
karen	jernberg	96161	TRUCKEE	CA
Karen	Weiss	94025	MENLO PARK	CA
Karen	Abbruscato	94566	PLEASANTON	CA
Karen	Karl	90049	LOS ANGELES	CA
Karen	Mayes	93455	SANTA MARIA	CA
Kamal	Gill	92807	ANAHEIM	CA
Kalee	Tock	94041	MOUNTAIN VIEW	CA
kajsa	ingelsson	90046	LOS ANGELES	CA
Kaitlin	Walker	95818	SACRAMENTO	CA
Kacie	Shelton	91101	PASADENA	CA
К.	Nilsen	95005	BEN LOMOND	CA
К	King	95819	SACRAMENTO	CA
К	Bluefield	90278	REDONDO BEACH	CA
Justine	McCarthy	95616	DAVIS	CA
Justin	Souter	91301	AGOURA HILLS	CA
Justin	Graham	95589	WHITETHORN	СА
June	Green	94002	BELMONT	CA
June	Bollinger	90048	LOS ANGELES	CA
June	Tong	94110	SAN FRANCISCO	CA
June	Venti	94002	BELMONT	CA
Julius	Dobos	94085	SUNNYVALE	CA
Julie	Knight	94941	MILL VALLEY	CA

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	Julie	Smith	93402	LOS OSOS	CA
	Julie	Hollinger	94610	OAKLAND	CA
	Julie	Vandergrift	92832-1425		
	Julie	Ranieri	95503	EUREKA	CA
	Julie	Ostoich	95826	SACRAMENTO	CA
	Julie	Frances	94087	SUNNYVALE	CA
	Julie	Dresner	90272	PACIFIC PALISADES	CA
	Julie	Kloper	95050	SANTA CLARA	CA
	Julie	А	95403	SANTA ROSA	CA
	Julie	Adelson	90405	SANTA MONICA	CA
	Julie	Clark	95436	FORESTVILLE	CA
	Julie	Ford	90740	SEAL BEACH	CA
	JULIANNE	GRAF-KUROV	95762	EL DORADO HILLS	CA
	Julianna	Riley	94608	EMERYVILLE	CA
	julianna	dickey	94703	BERKELEY	CA
	Julian	Yerena Jr	93648	PARLIER	CA
	Julia	Martin	94973	WOODACRE	CA
	julia	stein	91316	ENCINO	CA
	Julia	Carnahan	90405	SANTA MONICA	CA
	Julia	Keener	95973	СНІСО	CA
	JULIA	Deasley	92308	APPLE VALLEY	CA
	Julia	Hansen	94118	SAN FRANCISCO	CA
	Jule	Worrell	91401	VAN NUYS	CA
	Judy	Trahan	94611	OAKLAND	CA
	Judy	Schultz	94115	SAN FRANCISCO	CA
	Judy	Kendall	92591	TEMECULA	CA
	Judy	Dragon	95407	SANTA ROSA	CA
	Judy	Benson	92705	SANTA ANA	CA
	Judy	Gravino	95321	GROVELAND	CA
	Judy	johnson	95667	PLACERVILLE	CA
	Judy	Wang	95008	CAMPBELL	CA
	Judith	Schumacher-	94595	WALNUT CREEK	CA
	JUDITH	ANDERSON	95409	SANTA ROSA	CA
	Judith	Smith	94601	OAKLAND	CA
	Judith	Walter	93550	PALMDALE	CA
	Judith	Lefler	95066	SCOTTS VALLEY	CA
1	Judie	VL	95006	BOULDER CREEK	CA
	Judie	De Perry	92260-2172		
	Jude	Todd	95062	SANTA CRUZ	CA
	joyce/henry	moser	92637	LAGUNA WOODS	CA
	Joyce	Jenkins	94710	BERKELEY	CA
	Joyce	Johnston	93277	VISALIA	CA

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Joyce	Lang	92127	SAN DIEGO	CA
Joy	Schary	90213	BEVERLY HILLS	CA
Joy	Hollenback	94702	BERKELEY	CA
Joy	Fletcher	94702	BERKELEY	CA
Joy	Turlo	90277	REDONDO BEACH	CA
Joy	Zadaca	90807	LONG BEACH	CA
Joslyn	Baxter	94118	SAN FRANCISCO	CA
Joshua	Eisenberg	91601	NORTH HOLLYWOOD	CA
joshua	ruiz	92649	HUNTINGTON BEACH	CA
Josephine	Randel	92037	LA JOLLA	CA
JOSEPH	REEL	93950	PACIFIC GROVE	CA
Joseph	Lilli	90034	LOS ANGELES	CA
Joseph	Loomis	94038	MOSS BEACH	CA
Joseph	Sebastian	95821	SACRAMENTO	CA
Joseph	Szabo	90045	LOS ANGELES	CA
Jonica	Brooks	94114	SAN FRANCISCO	CA
Jonathan	Chu	94539	FREMONT	CA
Jon	Povill	90290	TOPANGA	CA
Jon	Grutman	90036	LOS ANGELES	CA
Jon	Anderholm	95421	CAZADERO	CA
John	Turney	94563	ORINDA	CA
john	martinez	90717	LOMITA	CA
John	Payne	94580	SAN LORENZO	CA
John	Dorenbechei	r 94599	YOUNTVILLE	CA
John	Slovak	95035-7028		
John	Henel	95472	SEBASTOPOL	CA
John	Edman	91208	GLENDALE	CA
John	Gasperoni	94703	BERKELEY	CA
JOHN	BENEVENTO	95221	ALTAVILLE	CA
John	Covey	90250	HAWTHORNE	CA
John	Lamb	91024	SIERRA MADRE	CA
Johanna	Abate	94109	SAN FRANCISCO	CA
Joelle	Shinaman	94549	LAFAYETTE	CA
Joel	Meza	94121	SAN FRANCISCO	CA
Joe	Weis	93654-2742		
Joe	Salazar	95407	SANTA ROSA	CA
joe	chen	94102	SAN FRANCISCO	CA
Joe	Adcock	92655	MIDWAY CITY	CA
Joe	Lavoie	93309	BAKERSFIELD	CA
Jody	Kaylor	94904	GREENBRAE	CA
Jody	Kleinman	90210	BEVERLY HILLS	CA
Jocelyne	Eberstein	90025	LOS ANGELES	CA

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Jocelyn	Parker	90025 LC	DS ANGELES	CA
Joanne	Dean	94536 FR	REMONT	CA
joanne	sultar	94705 BE	ERKELEY	CA
Joanne	Hoemberg	94539 FR	REMONT	CA
joanne	schwartz	92705 SA	ANTA ANA	CA
Joanne	D'Egidio	93105 SA	ANTA BARBARA	CA
Joanne	Tenney	92026 ES	SCONDIDO	CA
Joanne	Snyder	92123 SA	AN DIEGO	CA
Joanne	Barnes	94306 PA	ALO ALTO	CA
Joanna	Harrison	91104 PA	ASADENA	CA
Joann	Shook	95448 HE	EALDSBURG	CA
JoAnn	Gronbach	95628 FA	AIR OAKS	CA
Joan	Andersson	90290 TC	OPANGA	CA
Joan	Morris	60062 NG	ORTHBROOK	IL
Joan	Rashti	95401 SA	ANTA ROSA	CA
Joan	Tornai	96073 PA	ALO CEDRO	CA
Joan	Chin	95014 CL	JPERTINO	CA
Joan	Steiker	92679 TR	RABUCO CANYON	CA
Joan	Moderes 94	1523-4867		
joan	Schwarz	92203 IN	IDIO	CA
joan	ramstedt	92660 NE	EWPORT BEACH	CA
JL	Kohlmeyer	90019 LC	DS ANGELES	CA
Jin	Kim	95129 SA	AN JOSE	CA
Jim	Stewart	90813 LC	ONG BEACH	CA
Jillian	Saxty	94501 AL	LAMEDA	CA
jill	sykes	90046 LC	DS ANGELES	CA
Jill	Lowell	94510 BE	ENICIA	CA
Jill	Wiechman	91320 NE	EWBURY PARK	CA
Jill	Reichwald	90272 PA	ACIFIC PALISADES	CA
Jill	Alcantar	94112 SA	AN FRANCISCO	CA
Jill	Powell	94904 GF	REENBRAE	CA
Jill	Pascotto	90265 M	IALIBU	CA
Jill	Fullington	95531 CR	RESCENT CITY	CA
Jill	Bleyer	19703 CL	AYMONT	DE
Jill	Ratner	94618 OA	AKLAND	CA
Jesus	Diaz	92805 AN	NAHEIM	CA
Jessica	Sibilia	95123 SA	AN JOSE	CA
Jessica	Craven	90065 LC	DS ANGELES	CA
Jessica	Martinez	93033 O>	XNARD	CA
Jess	Graffell	92399 YL	JCAIPA	CA
Jerry	Cook	94030 M	IILLBRAE	CA
Jerry	Whitley	92653 LA	AGUNA HILLS	CA

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Jeroen	dewit	90065	LOS ANGELES	CA	
JeriLynn	DeBonis	94520	CONCORD	CA	
Jeremy	Kranz	91325	NORTHRIDGE	CA	
Jenny	Rempel	95814	SACRAMENTO	CA	
jennifer	campfield	94115	SAN FRANCISCO	CA	
Jennifer	Russell	94595	WALNUT CREEK	CA	-
Jennifer	Ross	95746	GRANITE BAY	CA	
Jennifer	Beekhuis	95722	MEADOW VISTA	CA	
Jennifer	Wiley	95076	WATSONVILLE	CA	
Jennifer	McGann	94903	SAN RAFAEL	CA	
Jennifer	Johnsen	94595	WALNUT CREEK	CA	
Jennifer	Grasso	90731	SAN PEDRO	CA	
Jennifer	Powell	91208	GLENDALE	CA	
Jennifer	Silver	92122	SAN DIEGO	CA	
Jennifer	Bass	90291	VENICE	CA	
jennifer	bradley	90404	SANTA MONICA	CA	
jennifer	norris	94515	CALISTOGA	CA	
Jennifer	Harris	94102	SAN FRANCISCO	CA	
Jennifer	von Schneida	91362	THOUSAND OAKS	CA	
Jennifer	Lawson	94925	CORTE MADERA	CA	
Jennifer	Lonbom	92014	DEL MAR	CA	
Jennifer	Ankele	91785	UPLAND	CA	=
Jennifer	Tait	95621	CITRUS HEIGHTS	CA	
Jennifer	Agnew	92831	FULLERTON	CA	
Jennifer	Gehrich	92679	TRABUCO CANYON	CA	
Jennifer	Scholte	95655	MATHER	CA	
Jennifer	Lakner	94901	SAN RAFAEL	CA	
Jenni	Lopez	92131	SAN DIEGO	CA	
Jenn	Н	95112	SAN JOSE	CA	
Jen	Bradford	91977	SPRING VALLEY	CA	
Jeffrey	Nigh	94127	SAN FRANCISCO	' CA	
Jeffrey	Tischler	93940	MONTEREY	CA	
Jeffrey	Chien	94920	BELVEDERE TIBURON	CA	
Jeff	Alford 95	5060-9450			
Jeff	Thayer	92117	SAN DIEGO	CA	
Jeannie	Pollak 93	3036-6210			
Jeannie	Boyd	94585	SUISUN CITY	CA	
Jeanne	Baker	92067	RANCHO SANTA FE	CA	
Jeanne	Courtney	94608	EMERYVILLE	CA	
Jeanne	Anderson	96001	REDDING	CA	
Jeanne	Lichman	92821	BREA	CA	
Jeanne	Greene	95928	CHICO	CA	

,

jeanna	menze		95476	SONOMA		CA		
Jeanie	Schmidt		94019	HALF MOON BAY		CA		
Jeanette	Phelps		95472	SEBASTOPOL		CA	,	
Jeanette	Christian		92270	RANCHO MIRAGE		CA		
Jeanelle	Taylor		91360	THOUSAND OAKS		CA		
Jean G.	Cochran		91767	POMONA		CA		
Jean	Crossley		95694	WINTERS		CA		
Jean	Ch		95219	STOCKTON		CA		
Jean	Richardson		92131	SAN DIEGO		CA		
Jean	Cheesman		93103	SANTA BARBARA		CA		
Jean	Kim		94582	SAN RAMON		CA		
Jean	Goodsell		92007	CARDIFF BY THE SEA		CA		
Jean	Rains		91342	SYLMAR		CA		
Jean	Arovas		92651	LAGUNA BEACH		CA		
Jaya	Fairchild		90065	LOS ANGELES		CA		
Jay	Rutherdale		95826	SACRAMENTO		CA		
Jay	Hadley		91730	RANCHO CUCAMONGA	4	CA		
Jason	Harris		93101	SANTA BARBARA		CA		
Jason	Wilson		94501	ALAMEDA		CA		
Jason	Fish		95355	MODESTO		CA		
Jasmin	Ayala		92707	SANTA ANA		CA		
Jarmila	Mikulik		95126	SAN JOSE		CA		
Janis	Hatlestad		91364	WOODLAND HILLS		CA		
Janine	Becket		93292	VISALIA		CA		
Janie	Lucas		94110	SAN FRANCISCO		CA		
Janice	Austin		92591	TEMECULA		CA		
Janice	Cleary		91360	THOUSAND OAKS		CA		
Janice	Tanaka		90024	LOS ANGELES		CA		
JANICE	KRAMER		91024	SIERRA MADRE		CA		
Janice	Vieth		91724	COVINA		CA		
Janet and Ma	Thew		95650	LOOMIS		CA		
janet	maker	90024	-3113					
Janet	Heinle		90403	SANTA MONICA		CA		
Janet	Eckholm		90046	LOS ANGELES		CA		
Janet	Shulman		90290	TOPANGA		CA		
Janet	Sturgeon		91784	UPLAND		CA		
Janet	Kristie	95819	-2417					
Janet	Rude		94558	NAPA		CA		
Janet	Devine		93561	TEHACHAPI		CA		
Janet	Kubler		91355	VALENCIA		CA		
Janet	Benson		94534	FAIRFIELD		CA		
Janet	Bagby		95006	BOULDER CREEK		CA		

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Janet	Rizzoli	93012	CAMARILLO	CA
Janet	Bowden	90232	CULVER CITY	CA
janet	tunick	90405	SANTA MONICA	CA
Janet	Schnitzler	92677-3594		
Janelle	Chase	94112-2459		
Jane	McVey	96161	TRUCKEE	CA
Jane	Fisher	95065	SANTA CRUZ	CA
Jane	August	90290	TOPANGA	CA
jane	rickert	91001	ALTADENA	CA
Jane	Harada	94709	BERKELEY	CA
Jane	Engelsiepen	93013	CARPINTERIA	CA
Jane	Hay	93428	CAMBRIA	CA
Jane	Burnett	94598	WALNUT CREEK	CA
Jane	Ahrens	94707	BERKELEY	CA
Jane	Nachazel	90026	LOS ANGELES	CA
Jana	Perinchief	95821	SACRAMENTO	CA
Jan	Salas	95062	SANTA CRUZ	CA
Jan	Herbert	95403	SANTA ROSA	CA
Jan	Warren	94598	WALNUT CREEK	CA
jan	stark	92683	WESTMINSTER	CA
Jan	Straub	95667	PLACERVILLE	CA
Jamila	Garrecht	94952	PETALUMA	CA
Jamie	Whittington	94965	SAUSALITO	CA
Jamie	Watkins	90019	LOS ANGELES	CA
Jamie	Rosenblood	90049-5214		
Jamianne	Verkade	92627	COSTA MESA	CA
James	Colman	91773	SAN DIMAS	CA
James	Dinsmore	95062	SANTA CRUZ	CA
James	Stamos	95070-4910		
James	Noordyk	92109	SAN DIEGO	CA
James	Connolly	95926	CHICO	CA
James	Vollaro	93117	GOLETA	CA
James	Johnson	93065	SIMI VALLEY	CA
James	Kleinrath DD	94070	SAN CARLOS	CA
James	Rees	94546	CASTRO VALLEY	CA
James	Berry	95120	SAN JOSE	CA
Jake	Winograd	95210	STOCKTON	CA
Jade	Chen	94116	SAN FRANCISCO	CA
Jacquelyn	Roberts	93561	TEHACHAPI	CA
Jacqueline	Safley	93720	FRESNO	CA
jacqueline	walburn	92845	GARDEN GROVE	CA
Jacqueline	Casares	90806	LONG BEACH	CA

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Jacqueline	Lee	90503	TORRANCE	CA
Jacqueline	Moresi	94127-1433		
Jacqueline	Wells	91302	CALABASAS	CA
Jackline	Slezak	92253	LA QUINTA	CA
Jackie	Mathieu	92596	WINCHESTER	CA
Jackie	Pomies	94122-1334		
Jackie	Caron	90603	WHITTIER	CA
Jack & Maril	y Kates	90630	CYPRESS	CA
Jack	Mcallister	95945	GRASS VALLEY	CA
Jack	Parkèr	93405	SAN LUIS OBISPO	CA
J. Michael "N	/Henderson	93405	SAN LUIS OBISPO	CA
J. Holley	Taylor	95946	PENN VALLEY	CA
J	Conn	92618	IRVINE	CA
j	Forkish	94087	SUNNYVALE	CA
J	Pizzo	94925	CORTE MADERA	CA
J	Novak	94558	NAPA	CA
j	greene	95927	СНІСО	CA
J		91367	WOODLAND HILLS	CA
J	Sculley	93101	SANTA BARBARA	CA
J	Cirocco	95124	SAN JOSE	CA
J	Lane	95472	SEBASTOPOL	CA
J	Duerr	95831	SACRAMENTO	CA
Ivanna	Stanfield	93561	ТЕНАСНАРІ	CA
Ivan	Meyreles	95403	SANTA ROSA	CA
iva	river	91711	CLAREMONT	CA
Isabella	Lardizabal	94903	SAN RAFAEL	CA
Isabel	Molloy	94121	SAN FRANCISCO	CA
lsa	Howard	94118	SAN FRANCISCO	CA
lsa	Aron	90035	LOS ANGELES	CA
Irma	Zuckermann	94708	BERKELEY	CA
IRMA	VALLES	91387	CANYON COUNTRY	CA
Irma	Medellin	93247	LINDSAY	CA
Iris	Cramer	91307-3633		
Irene	Dobrzanski	91007	ARCADIA	CA
Irene	Kang	90066	LOS ANGELES	CA
Irene	Wolf	93111	SANTA BARBARA	CA
inna	abramova	90069	WEST HOLLYWOOD	CA
Ingrid	Brewer	93103	SANTA BARBARA	CA
Inge	Meinzer	93446	PASO ROBLES	CA
Inge	Wagner	90020	LOS ANGELES	CA
Indira	Smith	94118	SAN FRANCISCO	CA
llya	Turov	92555	MORENO VALLEY	CA

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Ilana	Bar-David	94121	SAN FRANCISCO	CA
lan	Harvey	92101	SAN DIEGO	CA
Howard	Leonard	94954	PETALUMA	CA
hope	roberts	95019	FREEDOM	CA
Home	Meyer	91006	ARCADIA	CA
Hollie	Michelle	91607	VALLEY VILLAGE	CA
Hillary	Ostrow	91316	ENCINO	CA
Hilary	Emberton	95945	GRASS VALLEY	CA
Herta	Jevremov	92084	VISTA	CA
Herb	West	90065	LOS ANGELES	CA
Henry	Schlinger	91201	GLENDALE	CA
Henry	Morgen	90019-2550		
Helga	Barr	94118	SAN FRANCISCO	CA
Helene	Whitson	94709	BERKELEY	CA
helene	hansen	94118	SAN FRANCISCO	CA
Helena	Dedic	92625	CORONA DEL MAR	CA
Helena	Wilcox	95204	STOCKTON	CA
Helen	Lucey	94117	SAN FRANCISCO	CA
Helen	Luey	94117	SAN FRANCISCO	CA
Heike	Behl	92109	SAN DIEGO	CA
heidi	zimmerman	95945	GRASS VALLEY	CA
Heidi	Chesley	93108	SANTA BARBARA	CA
Heidi	Berglin	92129	SAN DIEGO	CA
Heidi	Buech	90066	LOS ANGELES	CA
Heather	Jacobson	94949	NOVATO	CA
Heather	Hiett	94601	OAKLAND	CA
Heather	Smee-Fosbur	95945	GRASS VALLEY	CA
Heather	Sepulveda	90802	LONG BEACH	CA
Heather	Нарр	94010	BURLINGAME	CA
Heather	Troxtell	95670	RANCHO CORDOVA	CA
Heather	Cook	92131	SAN DIEGO	CA
haydee	felsovanyi	94060	PESCADERO	CA
Harriet	Ingram	94131	SAN FRANCISCO	CA
Harriet	Stephens	95604	AUBURN	CA
Hannelore	Robinson	95843	ANTELOPE	CA
Hana	Sed	94611	OAKLAND	CA
Hana	Jonas	96067	MOUNT SHASTA	CA
Hal	Okholm	92637	LAGUNA WOODS	CA
Н	V	92260	PALM DESERT	CA
Guy	Peled	95117	SAN JOSE	CA
Gunilla	Karlsson, Ph.	91377	OAK PARK	CA
Guita	Mesriani	90049-4106		

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Gretchen	Egen	94553	MARTINEZ	CA	
Gregory	Alper	90272	PACIFIC PALISADES	CA	
Greg	McDonell	95823	SACRAMENTO	CA	
Greg	Samii	94553	MARTINEZ	CA	
Greg	Gruner	95971	QUINCY	CA	
Graciela	Barajas	92102	SAN DIEGO	CA	
Gloria	Schipper	95688	VACAVILLE	CA	
gloria	marth	94915	SAN RAFAEL	CA	
Gloria	English	95247	MURPHYS	CA	
Gloria	Aguirre	91384	CASTAIC	CA	
Glennda	Campos	95691	WEST SACRAMENTO	CA	
Glenna	Dowling	94115	SAN FRANCISCO	CA	
glenn	Embrey	90278-2533			
Glenn	Mounkes	95616	DAVIS	CA	
Glenda	Turner	90034	LOS ANGELES	CA	
glenda	knight	92117	SAN DIEGO	CA	
Glenda	Beukelman	92314	<b>BIG BEAR CITY</b>	CA	
Gina	Mori	93420	ARROYO GRANDE	CA	
Gina	Nowicki	94609	OAKLAND	CA	
Gerda	SEAMAN	95926	CHICO	CA	
Gerard	Bourguignor	n 94941	MILL VALLEY	CA	
Gerard	Pope	90804	LONG BEACH	CA	
Gerard	Green	94611	OAKLAND	CA	
Gerald	Shaia	91352	SUN VALLEY	CA	
Georgiana	Birch	92127	SAN DIEGO	CA	
Georgia	Brewer	91401-5228			
Georgia	Fizdale	91320	NEWBURY PARK	CA	
George	Lewis	93402	LOS OSOS	CA	
George	Post	94805	RICHMOND	CA	
George	Scherba	94949-6829			
George	Illes	92627	COSTA MESA	CA	
George	Ferrell	90402	SANTA MONICA	CA	
Geoffrey	Smith	93004	VENTURA	CA	
GeneAnna	McMillan	95926	CHICO	CA	
Gayle	Kirma	90277	REDONDO BEACH	CA	
Gayle	Jamerson	95828	SACRAMENTO	CA	
Gayle	Spencer	94025	MENLO PARK	CA	
Gary	Beckerman	93460	SANTA YNEZ	CA	•
, Gary	Weis	91387	CANYON COUNTRY	CA	
, Gary	Lee	92264	PALM SPRINGS	CA	
Gary	Ammirati	90065	LOS ANGELES	CA	
, gane	brooking	93004	VENTURA	CA	
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Gaile	Carr	96067	MOUNT SHASTA	CA
Gail	Brosnan	95616	DAVIS	CA
Gail	Derin	95827	SACRAMENTO	CA
Gail	Lack	93906	SALINAS	CA
Gail	Henigman	94117	SAN FRANCISCO	CA
Gail	Kurisu	94087	SUNNYVALE	CA
Gail	Hubbs	91320	NEWBURY PARK	CA
Gabriele	Sisk	94560	NEWARK	CA
Gabriel	Sheets	95338	MARIPOSA	CA
Gabi	Frei	92677	LAGUNA NIGUEL	CA
GC	Knopf	93405	SAN LUIS OBISPO	CA
G	O'CALLAHAN	93117	GOLETA	CA
G	Caviglia	95038	MORGAN HILL	CA
Fritz & Cora	Dittrich	96125	SIERRA CITY	CA
Fredda	Kurtz	91301	AGOURA HILLS	CA
fred	okimoto	94566	PLEASANTON	CA
Frankie	Nielsen	94611	OAKLAND	CA
Frank B.	Anderson	90731-1840		
Frank & Cora	Poppie 9	91755-1916		
Frank	Selig	90250-7384		
Francois		94952	PETALUMA	CA
Francine	Urzua	93905	SALINAS	CA
Francesca	Webb	95076	WATSONVILLE	CA
Francesca	Long	94116	SAN FRANCISCO	CA
Francesca	Prada	94110	SAN FRANCISCO	CA
fran	chesaux	90001	LOS ANGELES	CA
FORREST	HOPPING	93702	FRESNO	CA
Floyd	O'Brien	95204	STOCKTON	CA
Florence	Pangelinan	93449	PISMO BEACH	CA
Fjaere	Mooney	91606	NORTH HOLLYWOOD	CA
Fiona	Priskich	90210-5432		
Faye	Soares	95726	POLLOCK PINES	CA
Fabienne	Farmer	95220	ACAMPO	CA
F. Michael	Montgomery	, 95403	SANTA ROSA	CA
Evelyn	Greenwald	93401	SAN LUIS OBISPO	CA
Evan	Beattie	90029	LOS ANGELES	CA
Evan	McDermit	92832	FULLERTON	CA
Eva	Thomas	94062	REDWOOD CITY	CA
Eugene	Majerowicz	90008	LOS ANGELES	CA
Eudora	Dadpagouh	92505	RIVERSIDE	ĊA
Essie	Blau	94941	MILL VALLEY	CA
Ernie	Looney	91380	SANTA CLARITA	CA

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Ernest	Stevens	92283	WINTERHAVEN	CA
Erin	Hunter	92117	SAN DIEGO	CA
Erin	Fortin	91207	GLENDALE	CA
erin	garcia	91356	TARZANA	CA
Erin	Warnick	95476-4043		
Erika	Miller	92532	LAKE ELSINORE	CA
Erica	Richter	94070	SAN CARLOS	CA
Erica	Griffin	94115	SAN FRANCISCO	CA
Erica	Wang	94086	SUNNYVALE	CA
Erica	Stafford	95341	MERCED	CA
Eric	Schwartz	93103	SANTA BARBARA	CA
Eric	Esquivel	90623	LA PALMA	CA
Eric	Treworgy	90064	LOS ANGELES	CA
Eric	Tilenius	94010	BURLINGAME	CA
Eric	Grunbaum	90291	VENICE	CA
Endee	Wei	94583	SAN RAMON	CA
Emma	Silvius	94122	SAN FRANCISCO	CA
Emily	Wade	92128	SAN DIEGO	CA
Emily	Huang	94121	SAN FRANCISCO	CA
Emily	Ettinger	91316	ENCINO	CA
Emily	Lagergren	91406	VAN NUYS	CA
Emilio	Perez	92503	RIVERSIDE	CA
Emil	Lawton	91423	SHERMAN OAKS	CA
Em	Squires	95476	SONOMA	CA
Eloise	Hill	94501	ALAMEDA	CA
Elmer	Crain	95608	CARMICHAEL	CA
Elmer	Berger	94901	SAN RAFAEL	CA
Elma	Siemon	95152	SAN JOSE	CA
Ellen	Chambell	92672	SAN CLEMENTE	CA
Ellen	Alkon	90274	PALOS VERDES PENINSULA	CA
Ellen	Boyd	95008	CAMPBELL	CA
Elke	Savala	94530	EL CERRITO	CA
Elizabeth	Littell	94602	OAKLAND	CA
Elizabeth	McCarthy	94703	BERKELEY	CA
Elizabeth	Rasmussen	95973	CHICO	CA
Elizabeth	Darovic	93940	MONTEREY	CA
elizabeth	reilly	94123	SAN FRANCISCO	CA
Elizabeth	Hurley	92592	TEMECULA	CA
Elizabeth	Juarez	92677	LAGUNA NIGUEL	CA
Elizabeth	Sesma	95060	SANTA CRUZ	CA
Elizabeth	Juvet	95425	CLOVERDALE	CA
elizabeth	foree	94122	SAN FRANCISCO	CA

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Elizabeth	Kinchloe		94502	ALAMEDA	CA	
Elizabeth	Colvin		94306	PALO ALTO	CA	
Elizabeth	Moreno	95117	7-3248			
elissa	0		90064	LOS ANGELES	CA	
Elise	Stengle		94112	SAN FRANCISCO	CA	
Elisabeth	Tweedie		90732	SAN PEDRO	CA	
Elisabeth	Kahan		93465	TEMPLETON	CA	
Elisa	Atwill		93108	SANTA BARBARA	CA	
Eliah	Perona		90291	VENICE	CA	
Eli	Baginski		95503	EUREKA	CA	
Eleni	Hioureas		90025	LOS ANGELES	CA	
Elena	Myers		94107	SAN FRANCISCO	CA	
Eleanor	Oxman		94611	OAKLAND	CA	
Eleanor	Norris		95616	DAVIS	CA	
Elbert	Basa		91506	BURBANK	CA	
Elaine	Alfaro		95018	FELTON	CA	
Elaine	Larson		94954	PETALUMA	CA	
Elaine	Dinges		92660	NEWPORT BEACH	CA	
Elaine	Rich		94583	SAN RAMON	CA	
Elaine	Cefola		92056	OCEANSIDE	CA	
Elaine	Schmitz		94583	SAN RAMON	CA	
Elaine	Edell		91362	THOUSAND OAKS	CA	
Eileen	Bill		95404	SANTA ROSA	CA	
Eileen	Kramer	94708	3-1032			
Eileen	Wilson		94608	EMERYVILLE	CA	
Eileen	Massey		94608	EMERYVILLE	CA	
eileen	waller		93036	OXNARD	CA	
Eileen	Green		92675	SAN JUAN CAPISTRANO	CA	
eh	estes		94041	MOUNTAIN VIEW	CA	
Edwin	Aiken		94087	SUNNYVALE	CA	
edward	abbey		90401	SANTA MONICA	CA	
Edward	Resetar		90071	LOS ANGELES	CA	
Edward	Mejia-Sarate	1	94577	SAN LEANDRO	CA	
edie	bruce		94530	EL CERRITO	CA	
Edh	Stanley	95823	3-1457			
Ed	Schehl		95063	SANTA CRUZ	CA	
ea	mccuiston		94558	NAPA	CA	
E	Р		95481	TALMAGE	CA	
E	Cherier		94941	MILL VALLEY	CA	
Dudley and (	Campbell	91403	1-1329			
Dr. Shelley A	Stravitz		90049	LOS ANGELES	CA	
Dr. George B	Kauffman	93720	0-2309			

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Douglas	Rapp	94303 PALO ALTO	CA
Doug	Musick	94597 WALNUT CREEK	CA
Dorothy	Felton	95610 CITRUS HEIGHTS	CA
Dorothy	Bernard	90403 SANTA MONICA	CA
Dorothy	Kolb	91006 ARCADIA	CA
doris	rodriguez	92630 LAKE FOREST	CA
Donna	Watson	95833 SACRAMENTO	CA
Donna	Carr, M.D.	92024 ENCINITAS	CA
Donna	DeRosa	95492 WINDSOR	CA
DONNA	SMITH	94820 EL SOBRANTE	CA
Donna	Barker	91701 RANCHO CUCAMONGA	CA
donald	taylor	95628 FAIR OAKS	CA
don	green	94610 OAKLAND	CA
Dolores	Pritchard	92627 COSTA MESA	CA
Dita	Å kaliÄ🛛	92260 PALM DESERT	CA
Dianne	Simpson	94553 MARTINEZ	CA
dianne	hernandez	95662 ORANGEVALE	CA
Diane Lee	Moomey	94019 HALF MOON BAY	CA
Diane	Sommers	94501 ALAMEDA	CA
Diane	Gardner	92880 CORONA	CA
diane	christiansen	93711 FRESNO	CA
Diane	Reed	94804 RICHMOND	CA
Diane	Yanas	92313 GRAND TERRACE	CA
Diane	Mastio	92057 OCEANSIDE	CA
Diane	Demee-Beno	94925 CORTE MADERA	CA
Diane	Pitzel	92109 SAN DIEGO	CA
Diane	Mott	94939 LARKSPUR	CA
Diane	Mojica	91006 ARCADIA	CA
Diana	Aston	94024 LOS ALTOS	CA
Diana	Honig	94563 ORINDA	CA
Diana	Hoffmeister	94040 MOUNTAIN VIEW	CA
Diana	Stark	94010 BURLINGAME	CA
Diana	Pantoja	95051 SANTA CLARA	CA
Diana	Castro	90814 LONG BEACH	CA
diana	horowitz	91367 WOODLAND HILLS	CA
Diana	Dee	91606 NORTH HOLLYWOOD	CA
Diana	Waters	90505 TORRANCE	CA
Diana	Crispi	90034 LOS ANGELES	CA
Diana	Rothman	95060 SANTA CRUZ	CA
diana	nasser	95472 SEBASTOPOL	CA
Diana	Diaz	92069 SAN MARCOS	CA
DH	Higgins	94709 BERKELEY	CA

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Devlon	Clouser	94949-63	867		
Desiree	Walker	952	209	STOCKTON	CA
Derek	Lee	953	350	MODESTO	CA
Derek	Van Hoorn	945	530	EL CERRITO	CA
derald	myers	950	062	SANTA CRUZ	CA
Dennis	Allen	933	101	SANTA BARBARA	CA
Dennis	Phillips	916	607	VALLEY VILLAGE	CA
Dennis	Ledden	956	656	MOUNT AUKUM	CA
Dennis	Trembly	90012-24	17		
Denise	Louie	942	131	SAN FRANCISCO	CA
Denise	Redden	956	603	AUBURN	CA
Denise	Johnston	956	677	ROCKLIN	CA
Denise	Кеу	953	356	MODESTO	CA
Denise	Jackson	921	123	SAN DIEGO	CA
Denise	Barger	935	514	BISHOP	CA
Denise	Williams	956	640	IONE	CA
Denise	Compskey	955	519	MCKINLEYVILLE	CA
Denis	Fasquelle	912	201	GLENDALE	CA
Dee	Trask	910	001	ALTADENA	CA
Debra	Atlas	785	596	WESLACO	ΤХ
Debra	Atlas	960	001	REDDING	CA
Debra	Foster	934	405	SAN LUIS OBISPO	CA
Debra	Burk	958	864	SACRAMENTO	CA
Debra	Cohn	910	011	LA CANADA FLINTRIDGE	CA
Debra	Fox	920	054	OCEANSIDE	CA
Debra	Baldwin	926	548	HUNTINGTON BEACH	CA
Debra	Presutti	907	731	SAN PEDRO	CA
Deborah	Ebersold	900	046	LOS ANGELES	CA
Deborah	Remy	939	924	CARMEL VALLEY	CA
Deborah	Evans	926	591	MISSION VIEJO	CA
Deborah	Filipelli, PhD	954	497	THE SEA RANCH	CA
Deborah	Mullen	93422-13	322		
Deborah	Childers	953	350	MODESTO	CA
Deborah	Nitasaka	954	442	GLEN ELLEN	CA
Deborah	Robinson	949	903	SAN RAFAEL	CA
Deborah	Walker	928	886	YORBA LINDA	CA
Debby	Fust	950	076	WATSONVILLE	CA
Debbie	Starr	960	003	REDDING	CA
Debbie	Wagstaff	923	311	BARSTOW	CA
Debbie	Tenenbaum	947	703	BERKELEY	CA
Debbie	Proctor	930	004	VENTURA	CA
Deanna	Schoen	954	410	ALBION	CA

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Deanna	Guzman	91791	WEST COVINA	CA
Dean	Muller	94707	BERKELEY	CA
Dawn	Undurraga	93013	CARPINTERIA	CA
Davide	Bergamasco	97703		
David A.	Smith	92617	IRVINE	CA
David	O'Neill	92647	HUNTINGTON BEACH	CA
David	Lyons	95949	GRASS VALLEY	CA
David	Schneider	95409	SANTA ROSA	CA
David	Hagler	93291	VISALIA	CA
David	Bjorklund	94121	SAN FRANCISCO	CA
David	Soares	95726	POLLOCK PINES	CA
David	Seifert	94804	RICHMOND	CA
David	Searfoss	90405	SANTA MONICA	CA
David	Doering	94109	SAN FRANCISCO	CA
David	Toivainen	96003	REDDING	CA
David	Sherman	95405	SANTA ROSA	CA
David	Collier	95020	GILROY	CA
David	Chatfield	97206	PORTLAND	OR
Dave	Whipple	93950	PACIFIC GROVE	CA
Darynne	Jessler	91607	VALLEY VILLAGE	CA
Darryl	Maney	94605	OAKLAND	CA
Darrell	Rolstone	94939	LARKSPUR	CA
Darius	Fattahipour	92127	SAN DIEGO	CA
Darcy	Price	93422	ATASCADERO	CA
danika	kohler	91607	VALLEY VILLAGE	CA
Danielle	Machotka	94960	SAN ANSELMO	CA
Daniel	Backstrom	96080	RED BLUFF	CA
Dana	Beckstoffer-Y	94952	PETALUMA	CA
Dan and Pau	lFogarty	95409	SANTA ROSA	CA
Dan	Nagle	92040	LAKESIDE	CA
Dan	Anderson	95747	ROSEVILLE	CA
Dale	Anania	94702	BERKELEY	CA
Dakota	Corey	93003	VENTURA	CA
Dai	Leon	93024	OJAI	CA
D.G.	Sifuentes	93546	MAMMOTH LAKES	CA
d	daly	90291	VENICE	CA
D	Naman	95060	SANTA CRUZ	CA
d	g	93258	PORTERVILLE	CA
Cyril Bouteill	Bouteille	94040	MOUNTAIN VIEW	CA
Cynthia	Sewak	90815	LONG BEACH	CA
Cynthia	Acree	92056	OCEANSIDE	CA
Cynthia	Patrick	93004	VENTURA	CA

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Cynthia	Miller	94553	MARTINEZ	CA
Cynthia	Davis	95969	PARADISE	CA
Cynthia	Tuthill	94547	HERCULES	CA
cyndee	newick	95008	CAMPBELL	CA
Crystal	Doan	92129	SAN DIEGO	CA
Cristina	Svec	94502	ALAMEDA	CA
Craig	Cook	95401	SANTA ROSA	CA
Courtney	Caldwell	92627	COSTA MESA	CA
Cornelia	Baranyi	94502	ALAMEDA	CA
Corinne	Pettey	95842	SACRAMENTO	CA
Corey	Prost	90405	SANTA MONICA	CA
Corey	Benjamin	90027	LOS ANGELES	CA
constance	lane	95118	SAN JOSE	CA
Constance	Као	94110	SAN FRANCISCO	CA
connie	powers	92130	SAN DIEGO	CA
Connie	Wilkinson	93449	PISMO BEACH	CA
Connie	Bohannon	95482	UKIAH	CA
Connie	Zarate	93033	OXNARD	CA
Concha	Madrid	91601	NORTH HOLLYWOOD	CA
Colleen	Carter	91387	CANYON COUNTRY	CA
Colleen	Campbell	94954	PETALUMA	CA
Colleen	Atkins	95965	OROVILLE	CA
colleen	ouimet	95628	FAIR OAKS	CA
Colin	Ramsay	95472	SEBASTOPOL	CA
Colin	Lindsly	94957	ROSS	CA
Coleen	Mackin	94005	BRISBANE	СА
Cody	Dolnick	92252	JOSHUA TREE	CA
Clay	Winkler	95404	SANTA ROSA	CA
Claudia	Hill	92069	SAN MARCOS	CA
Claudia	Shapiro	11746	HUNTINGTON STATION	NY
Claire	Stone	94708	BERKELEY	CA
Circus	Szalewski	90012	LOS ANGELES	CA
Cipra	Nemeth	90048	LOS ANGELES	CA
Cindy	Stuckert	93720	FRESNO	CA
cindy	stein	91360	THOUSAND OAKS	СА
Cia	Rosenberg	94524	CONCORD	CA
Chuck	Rocco	93065	SIMI VALLEY	CA
Chrysanthi	Lawrence	94805	RICHMOND	CA
Christy	Underwood	91350	SANTA CLARITA	CA
Christy	Stroud	95457	LOWER LAKE	CA
Christopher	Hamilton	94706	ALBANY	CA
Christopher	Horner	93108	SANTA BARBARA	CA

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	Christopher	Inman	94070	SAN CARLOS	CA
	Christney	McGlashan	94941	MILL VALLEY	CA
	Christine	Orth	94941	MILL VALLEY	CA
	Christine	Stewart	92026	ESCONDIDO	CA
	Christine	Goodreau	90036	LOS ANGELES	CA
	Christine	Cantu	90504	TORRANCE	CA
×	Christine	Czarnecki	94301	PALO ALTO	CA
	Christine	Tanaka 90025	5-5150		
	Christine	Waters-Swar	91741	GLENDORA	CA
	Christine	Favus	92122	SAN DIEGO	CA
	Christine	Lin	92614	IRVINE	CA
	Christine	Marie	94518	CONCORD	CA
	Christine	Sepulveda	92802	ANAHEIM	CA
	christine	Horbaly	95125	SAN JOSE	CA
	Christine	Anderson	94549	LAFAYETTE	CA
	Christina	Vallianos	94109	SAN FRANCISCO	CA
	christina	ciesla	93063	SIMI VALLEY	CA
	Christina	Hull Aboukin	90254	HERMOSA BEACH	CA
	Christina	Burton	92308	APPLE VALLEY	CA
	Christianne	Egger	91321	NEWHALL	CA
	Christian	Santiago	90025	LOS ANGELES	CA
	Christian	Blackburn 95608	3-3855		
	Christa	Neuber	90069	WEST HOLLYWOOD	CA
	chrissy	hamilton	91301	AGOURA HILLS	CA
	chris	fazio	94403	SAN MATEO	CA
	Chris	Dicey	94973	WOODACRE	CA
	Chris	Worcester	96161	TRUCKEE	CA
	Chris	Lee	90047	LOS ANGELES	CA
	Chris	Shinaberger	90405	SANTA MONICA	CA
	Chris	Levinson	91362	THOUSAND OAKS	CA
	Chris	Greene	95912	ARBUCKLE	CA
	cheryll	obayashi	90066	LOS ANGELES	CA
	Cheryl	Snow	94806	SAN PABLO	CA
	Cheryl	Tibshirani	94306	PALO ALTO	CA
	Cheryl	Hayes	96125	SIERRA CITY	CA
	cherie	garrett	93103	SANTA BARBARA	CA
	Cheri	La Rocque	93105	SANTA BARBARA	CA
	Cheri	Johnson	90290	TOPANGA	CA
	Cheri	Castro	95267	STOCKTON	CA
	Chelsea	Goodrich	91301	AGOURA HILLS	CA
	Charlotte	Sines	95389	YOSEMITE NATIONAL PARK	CA
	Charline	Ratcliff	94596	WALNUT CREEK	CA

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Charles	Wolfe		91342	SYLMAR	CA
Charles	Halpern		94705	BERKELEY	CA
Charles	Marquardt		94040	MOUNTAIN VIEW	CA
Charles	Alexander		92376	RIALTO	CA
Charles	Firestone		93103	SANTA BARBARA	CA
Charleen	Kubota	94611	L-1221		
Charleen	Steeves		90290	TOPANGA	CA
Chantal	Holmes		91360	THOUSAND OAKS	CA
Chandra	Tobey		92084	VISTA	CA
chan	р		90036	LOS ANGELES	CA
Chad	Monk		90071	LOS ANGELES	CA
Chad	Johnson		90806	LONG BEACH	CA
Celeste	Anacker		93105	SANTA BARBARA	CA
Cecilia	Baker		91350	SANTA CLARITA	CA
Cecil	Wilkerson		96067	MOUNT SHASTA	CA
Cathy	Mullins		92651	LAGUNA BEACH	CA
cathy	ziska		92010	CARLSBAD	CA
Cathy	Donovan		96150	SOUTH LAKE TAHOE	CA
Cathy	Conner		95667	PLACERVILLE	CA
cathy	stansell		93225	FRAZIER PARK	CA
Cathy	Crystal		95060	SANTA CRUZ	CA
cathy	russo		94706	ALBANY	CA
Cathy	Guilherme		95758	ELK GROVE	CA
Cathy	Goodrich		91046	VERDUGO CITY	CA
Catherine	Rusoff O'Neil		90402	SANTA MONICA	CA
Catherine	Yoder		96001	REDDING	CA
Catherine	johnson		91304	CANOGA PARK	CA
Catherine	Meyer		94611	OAKLAND	CA
Catherine	Riley		95928	CHICO	CA
Catherine	Scott		95467	HIDDEN VALLEY LAKE	CA
Catherine	Chen		90274	PALOS VERDES PENINSULA	CA
Cathe	Cornellio		94107	SAN FRANCISCO	CA
Cassina	Tarsia		92054	OCEANSIDE	CA
Cassie A.	Murphy		93465	TEMPLETON	CA
Cassandra	Barter		92630	LAKE FOREST	CA
Caryn	Cowin	9221:	1-7537		
Caryn	Graves		94702	BERKELEY	CA
Caryn	Doran		90027	LOS ANGELES	CA
Caryn	Alford		91942	LA MESA	CA
Carrie	Welte		95050	SANTA CLARA	CA
Carrie	Krauss		94024	LOS ALTOS	CA
Caron	Inouye		94546	CASTRO VALLEY	CA

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Carolyn and	Rosenstein	90067	LOS ANGELES	CA
Carolyn	Scarr	94702	BERKELEY	CA
Carolyn	Queener	94501	ALAMEDA	CA
Carolyn	Pettis	91350	SANTA CLARITA	CA
Carolyn	Knoll	94563-2552		
Carolyn	Dall	92129	SAN DIEGO	CA
Carolyn	Barkow	92119-1716		
Carolyn	Bahl	95608	CARMICHAEL	CA
Carolyn	Kim	94115	SAN FRANCISCO	CA
Carolyn	Hinds	95628	FAIR OAKS	CA
Caroline	Robinson	94941	MILL VALLEY	CA
carole	ballard	90501	TORRANCE	CA
Carol Anna	Lind	94117-4460		
Carol & Malo	Faust	95361-9537		
Carol	Vallejo	95209	STOCKTON	CA
Carol	Barr	95367	RIVERBANK	CA
Carol	Mock	94536	FREMONT	CA
carol	poper	95404	SANTA ROSA	CA
Carol	Luther	94960	SAN ANSELMO	CA
carol	Royce-Wilde	ı 90291	VENICE	CA
Carol	Carges	94115-1021		
Carol	Kommerstad	93108-2004		
Carol	Wolfe	95405	SANTA ROSA	CA
Carol	Brady	84501	PRICE	UT
Carol	Treacy	94952	PETALUMA	CA
Carol	Hallmeyer	95008	CAMPBELL	CA
CAROL	EPP	90274	PALOS VERDES PENINSULA	CA
Carol	Hughes	92129	SAN DIEGO	CA
Carol	Arvay	95602	AUBURN	CA
Carol	Cook	94403	SAN MATEO	CA
Carol	Miller	93420	ARROYO GRANDE	CA
carol	Hendl	91739	RANCHO CUCAMONGA	CA
Carol	Mone	94062	REDWOOD CITY	CA
Carol	Patton	94708	BERKELEY	CA
Carol	Ball	92007	CARDIFF BY THE SEA	CA
Carol	Wiley	92394	VICTORVILLE	CA
Carmela	glasgow	94402	SAN MATEO	CA
Carlos	Nunez	91335	RESEDA	CA
carlos	robles	90042	LOS ANGELES	CA
Carlene	Kemmerer	94303	PALO ALTO	CA
Carla	Durkin	94110	SAN FRANCISCO	CA
Carla	Price	92020	EL CAJON	CA

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Carla	Zuckerman	91321	NEWHALL	CA
CARLA	DAVIS	94925	CORTE MADERA	CA
Carl	Cartwright	90605	WHITTIER	CA
Carin	Hanna	95062	SANTA CRUZ	CA
Cara	Barnhill	93614	COARSEGOLD	CA
Candice	Barnett	90405	SANTA MONICA	CA
Candace	Niccolson	94560	NEWARK	CA
Camille	Gilbert	93101	SANTA BARBARA	CA
Camille	Curran	95667	PLACERVILLE	CA
CAMERON	RYAN	94971	TOMALES	CA
Calvin	Leong-Wong	91803	ALHAMBRA	CA
Caitlin	Swigart	90803	LONG BEACH	CA
Caitlin	Johnston	95018	FELTON	CA
caitlen	nelis-masters	90046	LOS ANGELES	CA
Caia	Cupito	96003	REDDING	CA
Caephren	McKenna	94610	OAKLAND	CA
с.	martinez	92104-1338		
с	с	90002	LOS ANGELES	CA
с	Ledesma	96150	SOUTH LAKE TAHOE	CA
С	G	92122	SAN DIEGO	CA
С	DALE	92117	SAN DIEGO	CA
Bryna	Chang	94306	PALO ALTO	CA
Bruce	England	94043	MOUNTAIN VIEW	CA
Bronwen	Grebe	91384	CASTAIC	CA
Bridget	Paley	91763	MONTCLAIR	CA
Brian	Luenow	94116	SAN FRANCISCO	CA
Brian	Weissbuch	94960	SAN ANSELMO	CA
Brian	Shiers	91602	NORTH HOLLYWOOD	CA
Brian	Smalley	94605	OAKLAND	CA
Bret	Gerber	92116	SAN DIEGO	CA
Bret	Smith	95060	SANTA CRUZ	CA
Brent	Spencer	90808-4105		
Brenda	McLaren	95030	LOS GATOS	CA
Brenda	Byers-Im	95843	ANTELOPE	CA
Brenda	Boyen	90403	SANTA MONICA	CA
Brenda	Schwartz	91436	ENCINO	CA
Brandon	Rosin	90731	SAN PEDRO	CA
Brandon	Woodward	90230	CULVER CITY	CA
Brad	Nelson	93035	OXNARD	CA
Bonnie Marg	; Burke	92160	SAN DIEGO	CA
Bonnie	Davis	95831	SACRAMENTO	CA
Bonnie	Sellstrom	95693	WILTON	CA

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Bonnie	Peterson		95621	CITRUS HEIGHTS		CA
Bonnie	Copland		91935	JAMUL		CA
Bonna	Evans		93291	VISALIA		CA
Bob	Schildgen		94703	BERKELEY		CA
Bob	Brady		94521	CONCORD		CA
blanche	bolsega		94619	OAKLAND		CA
bita	edwards		94973	WOODACRE		CA
Bissonnette	Rooni		95033	LOS GATOS		CA
Birgit	Witherspoor	l	92117	SAN DIEGO		CA
Billie	Schadt		92110	SAN DIEGO		CA
Bill	Wilson		95003	APTOS		CA
bill	R		96094	WEED		CA
biggi	vinkeloe		94609	OAKLAND		CA
Bia	Zamudio		91409	VAN NUYS		CA
Beverly	Perillo		94019	HALF MOON BAY		CA
Beverly	Johnson		92345	HESPERIA		CA
Beverly	Harris	90212	2-3505			
Bev	Buswell		95472	SEBASTOPOL		CA
Betty	Owen		92116	SAN DIEGO		CA
Betsy	Kramer		95204	STOCKTON		CA
Bethany	Schulze		95061	SANTA CRUZ		CA
Beth	Roland		95355	MODESTO		CA
Beth	Shafer		92646	HUNTINGTON BEACH		CA
Beth	Sereni		95476	SONOMA		CA
Beth	Bennion		95519	MCKINLEYVILLE		CA
Bernadette	Brooks		94558	NAPA		CA
Bernadette	Wulf		95444	GRATON		CA
Benjamin	Shieh		91789	WALNUT		CA
Benjamin	Α.		94560	NEWARK		CA
Ben	Smith	1	94706	ALBANY		CA
Beatrix	S		92109	SAN DIEGO		CA
Bea	Cohen		92241	DESERT HOT SPRINGS		CA
Barry	Kaufman	91506	5-1525			
Barrie	Stebbings		94970	STINSON BEACH		CA
Barbara	Bennigson		94301	PALO ALTO	(	CA
Barbara	Zamora		92069	SAN MARCOS		CA
Barbara	Smith		93004	VENTURA		CA
Barbara	Kivlen		92691	MISSION VIEJO		CA
Barbara	Woodmanse	I	95118	SAN JOSE		CA
Barbara	Ward		94563	ORINDA		CA
Barbara	Vienneau	92677	7-5317			
barbara	nigro	92036	5-9614			

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Barbara	Perea	94127	SAN FRANCISCO	CA	
Barbara	Gordon	92129	SAN DIEGO	CA	
Barbara	Weller	91423	SHERMAN OAKS	CA	
Barbara	Eikenberry	94044	PACIFICA	CA	
Barbara	Erny	94062	REDWOOD CITY	CA	
Barbara	Bruno	92660	NEWPORT BEACH	CA	
Barbara	Frances	95004	AROMAS	CA	
Barbara	Ginsberg	95062-3561			
Barbara	Main	93420	ARROYO GRANDE	CA	
Barbara	Haire	91752	MIRA LOMA	CA	
barbara	gilliard	95338	MARIPOSA	CA	
Barbara	Strout	90601-4420			
Barbara	Cosio	93444	NIPOMO	CA	
Barbara	Hennings	94024	LOS ALTOS	CA	
Barbara	Diederichs	92064	POWAY	CA	
Barbara	Vaughn	94965	SAUSALITO	CA	
Barbara	Marko	90046	LOS ANGELES	CA	
Barbara	Miller	93442	MORRO BAY	CA	
Barbara	Karvelas	92708	FOUNTAIN VALLEY	CA	
Barbara	McFarland	94501	ALAMEDA	CA	
Barbara	Wishingrad	93101	SANTA BARBARA	CA	
Barbara	Lowden	90630	CYPRESS	CA	
barb	linc	94598	WALNUT CREEK	CA	
Barb	Rysdale	90210	BEVERLY HILLS	CA	
Barb	Grosse	92064	POWAY	CA	
Bambi	Rethford	95833	SACRAMENTO	CA	
Bambi	Rhoden	95687	VACAVILLE	CA	
В.	Ε.	91361-4500			
Audrey	Drynan	95501	EUREKA	CA	
audrey	quintero	94403	SAN MATEO	CA	
Astrid	Lindell	95203	STOCKTON	CA	
Assunsao	Portela	94553	MARTINEZ	CA	
Ashlee	Sierra	91040	SUNLAND	CA	
arvel	trueblood	92040	LAKESIDE	CA	
Arthur	Connor	92549	IDYLLWILD	CA	
Arlene	Kosakoff	92014	DEL MAR	CA	
Arlene	Michalovitz	92584	MENIFEE	CA	
Ariana	Newcomer	95033	LOS GATOS	CA	
Anu	Budde	94402	SAN MATEO	CA	
antonio	cendejas	92879	CORONA	CA	
Antonette	Hood	92009	CARLSBAD	CA	
Antoinette	Samardzic	90034	LOS ANGELES	CA	

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Anthony	Martinez	95129 SAN JOSE	CA
anny	pfister	94062 REDWOOD CITY	CA
Annie	Spiegelman	94947 NOVATO	CA
Annette	Pirrone	94960 SAN ANSELMO	CA
Annette	Pittari	94070 SAN CARLOS	CA
annes	wolf	95405 SANTA ROSA	CA
Annelise	Bazar	95110 SAN JOSE	CA
Anne	Barker	94901 SAN RAFAEL	CA
anne		94110 SAN FRANCISCO	CA
Anne	Downs	93950 PACIFIC GROVE	CA
Anne	Parzick	92625 CORONA DEL MAR	CA
Anne	Mitchell	94112 SAN FRANCISCO	CA
Anne	Palmer	95401 SANTA ROSA	CA
Annabelle	Sanchez	92119 SAN DIEGO	CA
anna	mcbride	94564 PINOLE	CA
Anna	Harrington	93010 CAMARILLO	CA
Anna	Seiter	94558 NAPA	CA
Anna	Muelling	94025 MENLO PARK	CA
Anna	Parsons-Lam	91107 PASADENA	CA
Anna	Janakiraman	94024 LOS ALTOS	CA
Anna	Corbett	92078 SAN MARCOS	CA
Ann Marie	Polce	91401 VAN NUYS	CA
Ann	Rice	94536 FREMONT	CA
Ann	Hernday	95409 SANTA ROSA	CA
Ann	Shih	94930 FAIRFAX	CA
Ann	Wizer	94610 OAKLAND	CA
Ann	Rennacker	95437 FORT BRAGG	CA
Ann	Ritter	90808 LONG BEACH	CA
Ann	Dorsey	91325 NORTHRIDGE	CA
Ann	Mahoney	93103 SANTA BARBARA	CA
Ann	Arizu	94610 OAKLAND	CA
Ann	Kunke	93402 LOS OSOS	CA
Ann	Stevens	92692 MISSION VIEJO	CA
Ann	Van Zee	92056 OCEANSIDE	CA
Ann	Van Zee	97330 CORVALLIS	OR
Anke	Brady	94086 SUNNYVALE	CA
anja	Lasthaus	91902 BONITA	CA
Anita	Baldwin	95465 OCCIDENTAL	CA
Anita	Forbes	94018 EL GRANADA	CA
Anita	Hathaway	92881 CORONA	CA
Anita	Bilinskis	94510 BENICIA	CA
Anita	Watkins	94611 OAKLAND	CA

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Angie	Klein	94501	ALAMEDA	CA
Angie	Williams	93669	WISHON	CA
Angelica	Herrera	90025	LOS ANGELES	CA
Angel	wang	94040	MOUNTAIN VIEW	CA
Anfernee	Hardway	92804	ANAHEIM	CA
andy	tomsky	92079	SAN MARCOS	CA
Andrew	Olsen	90027	LOS ANGELES	CA
Andrew	Rigrod	91316	ENCINO	CA
Andreea	Boboc	95207	STOCKTON	CA
Andrea	Lleberman	90066	LOS ANGELES	CA
Andrea	Cook	94060	PESCADERO	CA
André	Luthard	95112	SAN JOSE	CA
anaundda	Elijah	93401	SAN LUIS OBISPO	CA
Anastasia	Glikshtern	94127	SAN FRANCISCO	CA
anastasia	yovanopoulo	94114	SAN FRANCISCO	CA
Ana	Herold	94044	PACIFICA	CA
Ana	Moreno	93036	OXNARD	CA
Amy	Golston	92130	SAN DIEGO	CA
Amy	Zink	94606	OAKLAND	CA
Amy	Barlow	95616	DAVIS	CA
Amy	Erickson	94087	SUNNYVALE	CA
Amy	Payne	94025	MENLO PARK	CA
Amy	Wilson	94401	SAN MATEO	CA
Amy	Bradac	94116	SAN FRANCISCO	CA
Amit	Shoham	94619	OAKLAND	CA
Amelia	Xann	92024	ENCINITAS	CA
amber	trigueros	93433	GROVER BEACH	CA
Amber	Tidwell	90230	CULVER CITY	CA
Amanda	Hughen	94110	SAN FRANCISCO	CA
Amanda	Woodruff	96161	TRUCKEE	CA
Amanda	Schmidt	95628	FAIR OAKS	CA
Amanda	West	<del>،</del> 94043	MOUNTAIN VIEW	CA
Alyss	Sanner	91384	CASTAIC	CA
Alwen	Bauer	90274	PALOS VERDES PENINSULA	CA
Alta	Rudomin	91324	NORTHRIDGE	CA
Allyson	Bishop	94117	SAN FRANCISCO	CA
Ally	Trock	91335	RESEDA	CA
Allison	Hushek	92651	LAGUNA BEACH	CA
Allison	Goodwin	95492	WINDSOR	CA
Allison	Rykiel	95928	CHICO	CA
Allen	Royer	95125	SAN JOSE	CA
Alithea	Zetter	94002	BELMONT	CA

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	Alissa	Wyffels	90403	SANTA MONICA	CA
	Alison	Litton	90004	LOS ANGELES	CA
	Alison	Zacharis	90421		
	Alison	Carlson	94115	SAN FRANCISCO	CA
	Alison	Hill	94549	LAFAYETTE	CA
	Alisa	Risso	92688	RANCHO SANTA MARGARITA	A CA
	ALICIA	VEGA	94551	LIVERMORE	CA
	Alicia	Williams	93108	SANTA BARBARA	CA
	Alice	Polesky	94107	SAN FRANCISCO	CA
	Alice	Wilson	92201	INDIO	CA
	Ali	Shyngle	91436	ENCINO	CA
	alexis	kerr	95021	GILROY	CA
	Alexis	Raleigh	92841	GARDEN GROVE	CA
	Alexandra	Skwara	92115	SAN DIEGO	CA
	ALEXA	VENDETTI	90027	LOS ANGELES	CA
	alex	wallman	90039	LOS ANGELES	CA
	Alex	Vollmer	94901	SAN RAFAEL	CA
	Alex	Silverio	95130	SAN JOSE	CA
	Alessandro	Fard	92591	TEMECULA	CA
	Alesia	CONNELLY	94707	BERKELEY	CA
	alena	jorgensen	91780	TEMPLE CITY	CA
	Aleksandra	Drecun	92129	SAN DIEGO	CA
	Alberto	Acosta	91505	BURBANK	CA
	Alberto	Saavedra	91423	SHERMAN OAKS	CA
	Albert	Brown	94117	SAN FRANCISCO	CA
	albert	weckel	94949	NOVATO	CA
	Alan	Robell	95014	CUPERTINO	CA
	Alan	Bartl	97524	EAGLE POINT	OR
	Alan	Schenck	94087-5231		
	Akiko	Tamano	92129	SAN DIEGO	CA
	Aileen	Harvey	94947	NOVATO	CA
	agnes	de lescure	94703	BERKELEY	CA
	adriana	estrella	90745	CARSON	CA
	Adam	Bernardi	90008	LOS ANGELES	CA
	Adam	Trauger	90815	LONG BEACH	CA
	Adam	Bernstein	90012	LOS ANGELES	CA
	Adair	Seldon	90066	LOS ANGELES	CA
-	Abo	Karin	95758	ELK GROVE	CA
	Aaron	McCann	94521	CONCORD	CA
	A.J.	Averett	91942	LA MESA	CA
	А	Haley	95223	ARNOLD	CA
	А	Adams	95014	CUPERTINO	CA

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А	JOHNSON	90039 LOS ANGELES	CA
А	Stiler	95073 SOQUEL	CA

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 From:
 Holly Welstein

 To:
 commentletters

 Subject:
 SBDDW-17-001

 Date:
 Tuesday, March 7, 2017 8:09:00 PM

RECEIVE 3-7-17 SWRCB Clerk

Dear Members of the Board:

I am concerned about the presence of 1,2,3 TCP in drinking water in many communities in the Central Valley. Safe, clean water is an especially precious resource - and you have the authority and responsibility to set standards to protect public health.

Please set the TCP drinking water standard at the detectable limit of 5 ppt. This will protect public health and allow water systems to recoup water treatment costs from the companies that knowingly sold contaminated pesticides that introduced this carcinogen into the water supply.

Sincerely, Holly Welstein 2246 Harvard St. Palo Alto 94306
April 21, 2017

State State of State



The Honorable Felicia Marcus, Chair and Members of the State Water Resources Control Board c/o Jeanine Townsend, Clerk to the Board State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95814

Delivered by email: commentletters@waterboards.ca.gov

## Subject: CWA Comments on Proposed 1,2,3-Trichloropropane Maximum Contaminant Level Regulations (SBDDW-17-001)

Dear Chair Marcus and Members of the Board:

On behalf of the California Water Association ("CWA") and its more than 100 investor-owned, CPUC<sup>1</sup>-regulated member public water utilities, thank you for the opportunity to provide comments on the proposed regulations to set a Maximum Contaminant Level ("MCL") for 1,2,3-Trichloropropane ("1,2,3-TCP"), notice of which was provided by the State Water Resources Control Board ("Board") on March 3, 2017 (the "Proposed Regulations"). CWA commends the staff on the development of the Proposed Regulations and joins all the commenting parties at the April 19, 2017, public hearing in supporting the proposed MCL of 0.000005 milligrams per liter (mg/L), or 5 parts per trillion (ppt). CWA proposes two additions herein to the Proposed Regulations that its members believe will strengthen the ability of the regulated community to comply with the new MCL in an expeditious manner.

#### **Comments**

## I. The Proposed Regulations Should Include a Systematic Compliance Strategy that Allows Water Systems to Come Into Compliance with the New Drinking Water Standard.

Many public water systems may be required to take potentially challenging and time-consuming actions in order to achieve compliance with the proposed new drinking water standard for 1,2,3-TCP. The Proposed Regulations do not recognize this important consideration. Water systems will need time to fully understand potential compliance issues and collect sufficient data upon which to



Jack Hawks. Executive Director California Water Association 601 Van Ness Avenue, Suite 2047 San Francisco, CA 94102-6316 415.561.9650 415.561.9652 fax 415.305.4393 cell jhawks@calwaterassn.com www.calwaterassn.com

#### Melissa Dixon, Administrative Director

California Water Association 700 R Street, Suite 200 Sacramento, CA 95811 916.231.2147 916.231.2141 fax mdixon@calwaterassn.com

CWA President Lawrence Morales East Pasadena Water 626,793,6189 lawrence@epwater.com

CWA Vice Presidents Keith Switzer Golden State Water Company

Evan Jacobs California American Water

Jeanne-Marie Bruno Liberty Utilities

CWA General Secretary and Treasurer Joel Reiker 11142 Garvey Avenue El Monte, CA 91733

El Monte, CA 91733 626.448.6183 jmreiker@sgvwater.com

CWA Billing Address California Water Association 700 R Street, Suite 200 Sacramento, CA 95811

CWA Mailing and Shipping Address California Water Association 601 Van Ness Avenue, Suite 2047 Mail Code: #E3-608 San Francisco, CA 94102-3200

<sup>&</sup>lt;sup>1</sup> California Public Utilities Commission.



State Water Resources Control Board April 21, 2017 Page 2 of 4

base a compliance strategy. Where treatment is determined to be necessary, the process of designing, financing, building and testing treatment facilities may take years. If the Board adopts the Proposed Regulation without modifying it to provide a practical path forward for public water systems to achieve compliance, many may be deemed in violation of the new standard despite their best (and good-faith) efforts to timely comply.

CWA recommends that the Board address this challenge by revising the Proposed Regulation to include a firm, but flexible strategy that would facilitate public water system compliance with the final MCL in a manner that balances the public health needs of customers with the cost and rate impacts on those same customers. A compliance program tailored to system-specific requirements that incorporates a workable pre-enforcement period, along with appropriate safeguards and milestones, would support the efforts of water systems seeking to implement cost-effective treatment, without delaying compliance.

Adopting such a strategy would be consistent with the approaches taken to "phase-in" compliance with other primary drinking water standard regulations, such as arsenic on the federal level<sup>2</sup> and chromium-6 on the state level.<sup>3</sup> Of course, each proposed new drinking water standard requires individualized consideration to ascertain an appropriate compliance strategy. CWA recognizes that the carcinogenic nature of 1,2,3-TCP contamination necessitates treatment as expeditiously as possible, that Granular Activated Carbon ("GAC") is a widely used and accepted treatment technology, and that there is much more consensus on the proposed standard for 1,2,3-TCP MCL than was the case for the chromium-6 MCL three years ago. Accordingly, CWA is neither recommending a five-year phased-in compliance time frame, nor the more elaborate SB 385 compliance program used for chromium-6. CWA references those two examples only for the proposition that implementing a practical compliance strategy that is responsive to public health, technical, financial and ratepayer needs has recent precedent. In CWA's view, an 18 to 24-month compliance time frame, for instance, would remove the specter of unwarranted enforcement action without removing the urgency to get treatment up and running.

Therefore, in order to better account for the substantial technical, operational and capital investments that some public water systems will be required to make, CWA urges the Board to revise the Proposed Regulation to include a systematic compliance program that includes a reasonable period for public water systems to achieve compliance with a 0.005 ppb 1,2,3-TCP MCL.

<sup>&</sup>lt;sup>2</sup> National Primary Drinking Water Regulations; Arsenic and Clarifications to Compliance and New Source Contaminants Monitoring; Final Rule, 66 Fed. Reg. 14, 6976 (Jan. 22, 2001).

<sup>&</sup>lt;sup>3</sup> Health and Safety Code Section 116431.



State Water Resources Control Board April 21, 2017 Page 3 of 4

II. The CEQA Document Issued in Connection with the Proposed Regulations Must Be Supplemented By Analysis of GAC Treatment.

Public Resources Code Section 21159 obliges the Board to perform, at the time of the adoption of a rule or regulation requiring "a performance standard or treatment requirement," an environmental analysis of, among other things, the "reasonably foreseeable methods of compliance."<sup>4</sup> While CWA does not challenge the **conclusions** drawn by the Initial Study/Mitigated Negative Declaration ("IS/MND") issued by the Board in connection with the Proposed Regulations, CWA does believe that this environmental document should be strengthened to clarify that the environmental analysis does, in fact, consider the likely environmental impacts of statewide implementation of GAC as the reasonably foreseeable method of compliance, as required by Section 21159.

The Initial Statement of Reasons and other supporting Board documents identify GAC as the Best Available Technology ("BAT") for treatment of 1,2,3-TPC. Because water systems have a duty to implement BAT, GAC is the required, and therefore the reasonably foreseeable treatment technology/pollution control equipment that public water systems must implement in order to comply with the new drinking water standard. The Board, therefore, needs to ensure that the IS/MND analyzes implementation of GAC in compliance with Public Resources Code Section 21159's express requirement for an analysis of environmental impacts of installing and operating such equipment. The economic analyses prepared for GAC have sufficiently developed assumptions regarding the installation and operation of GAC by water systems to support a complete and non-speculative environmental impacts analysis for installation, operation and maintenance of that treatment technology by water systems statewide. CWA's specific recommendations for bolstering the Board's IS/MND analysis of GAC are attached hereto as Appendix A.

A proactive effort by the Board to supplement the IS/MND and clarify that the analysis fully addresses the environmental effects of GAC implementation is critical to the efficient and cost-effective deployment of utility-sponsored 1,2,3-TCP treatment projects. By properly clarifying and expanding the Board's IS/MND analysis, the Board will allow lead agencies implementing GAC in response to the Board's adopted regulation to rely on an IS/MND prepared in compliance with Section 21159 to streamline, pursuant to Public Resources Code Sections 21159.2 and 21166, future CEQA review of water system projects to implement GAC. This is critical to the success of future compliance with the 1,2,3-TCP MCL because water systems will already be challenged to quickly permit and install GAC treatment systems to comply with the new MCL once adopted. As such, a streamlined CEQA

<sup>&</sup>lt;sup>4</sup> Public Resources Code Section 21159.



State Water Resources Control Board April 21, 2017 Page 4 of 4

review for the water utilities, which the Board's expanded analysis will facilitate, is essential to their timely compliance with the Board's final regulation.

For these reasons, CWA respectfully requests that the Board expand the analysis of the Initial Study/Mitigated Negative Declaration, as recommended herein, to clarify that it fully analyzes the likely environmental effects of GAC implementation, consistent with the requirements of Public Resources Code Section 21159.

#### **Conclusion**

Thank you again for the opportunity to provide these comments. CWA supports the Board's efforts to adopt primary drinking water standards for the protection of public health and seeks, by the above recommendations, to facilitate the orderly but expeditious implementation of a 1,2,3-TCP MCL. If you have any questions, please feel free to contact me at <u>jhawks@calwaterassn.com</u> or (415) 561-9650.

Sincerely,

Jack Hawks Executive Director, California Water Association

cc: The Honorable Steven Moore, Vice Chair, State Water Resources Control Board The Honorable Tam Doduc, Member, State Water Resources Control Board The Honorable Dorene D'Adamo, Member, State Water Resources Control Board The Honorable Joaquin Esquivel, Member, State Water Resources Control Board The Honorable Michael Picker, President, California Public Utilities Commission The Honorable Martha Guzman-Aceves, Commissioner, California Public Utilities Commission The Honorable Clifford Rechtschaffen, Commissioner, California Public Utilities Commission Mr. Tom Howard, Executive Director, State Water Resources Control Board Mr. Eric Oppenheimer, Chief Deputy Director, State Water Resources Control Board Mr. Rami S. Kahlon, Director, Water Division, California Public Utilities Commission California Water Association, Water Quality and Public Policy Committees

Ref No.	Representative list of Provisions Affected	Recommendation
1.	<ul> <li>Initial Statement of Reasons (ISOR), Economic and Technological Feasibility of Compliance, p. 11</li> <li>IS/MND, Section A. Project Description</li> <li>IS/MND, Cumulative Impacts, p. 62</li> </ul>	By way of example, the ISOR analysis on page 13 states that local conditions and extensive variability among sources creates significant challenges for accurately extrapolating from existing data the total number of sources that may require treatment statewide. Other ISOR provisions similarly discuss limitations on the ability to determine the number of sources and treatment units that may be needed statewide. Nevertheless, the IS/MND needs to conservatively address implementation of GAC statewide for all potential sources. Therefore, we recommend augmenting the IS/MND project description to explain, with greater specificity, the assumptions used to assure that the environmental impacts analysis comprehensively and conservatively considers the impacts of implementing GAC units statewide by all PWSs reasonably likely to be required to address any source of 1,2,3-TCP contamination. The assumptions discussed on pages 17 and 18 of the ISOR may be useful for this purpose.
2.	<ul> <li>ISOR, Conclusions of Feasibility of Proposed MCL, p. 22.</li> <li>IS/MND, Alternative Methods of Compliance, pp. 10-11</li> </ul>	The ISOR identifies Point of Entry (POE) treatment as a potential alternative method of compliance, but the IS/MND does not. We recommend augmenting the IS/MND to include POE as an alternative method of compliance, and an assessment of the likely impacts of implementing POE, which are unlikely to be significant. At a minimum, the IS/MND should acknowledge and explain the discrepancy.
3.	<ul> <li>IS/MND, Environmental Analysis of Reasonably Methods of Foreseeable Compliance, p. 9.</li> <li>IS/MND, Environmental Analysis of Alternative Methods of Reasonably Methods of Foreseeable Compliance, top of p. 11.</li> </ul>	The text correctly notes that the analysis must take into account a reasonable range of existing environmental conditions, technical factors, population areas, geographic areas and potential sites. We recommend augmenting this text to clarify assumptions used to develop this reasonable range to show substantial evidence that the Board fulfilled this requirement in preparing the IS/MND.
4.	• IS/MND, Environmental Analysis of Reasonably Foreseeable Environmental Impacts and Mitigation Measures Related to GAC, p. 14.	Clarify the discussion of future anticipated discretionary actions by the Board in connection with Safe Drinking Water Act amended permits, any public PWS in implementing GAC, and any other lead agencies with jurisdiction over private PWS implementation of GAC to provide that these future

Ref No.	Representative list of Provisions Affected	Recommendation
		discretionary actions are not anticipated to required additional environmental analysis based on the comprehensive analysis of the IS/MND, but if such supplemental analysis is required, it could be conducted in connection with such future discretionary actions.
5.	<ul> <li>IS/MND, Environmental Factors Potentially Affected, p. 16</li> <li>IS/MND, Evaluation of Environmental Effects, Section</li> </ul>	Since operation of GAC units require pumps, demanding energy, we recommend adding an analysis of energy impacts pursuant to the CEQA Guidelines Appendix F.
6.	• IS/MND, Evaluation of Environmental Effects, Air Quality, pp. 23-25.	We recommend adding in a discussion of construction air emissions for criteria pollutants since grading is anticipated to be necessary to install slabs, footings, etc., as is indicated on p. 33 of the IS/MND, and since greenhouse gas (GHG) emissions during construction are anticipated (p. 35). Standard Air Quality Management District construction mitigation measures may or may not be necessary. Rather than no impacts, we suggest that no cumulative air quality impacts would exist, but would be less than significant.
7.	• IS/MND, Evaluation of Environmental Effects, Biological Impacts, pp. 26-28	We recommend adding an additional MM to assure impacts to listed species (factor a) and impacts to Section 404 jurisdictional waters (factor c) and habitat conservation plans (factor f) are fully mitigated. Consistent with the state and federal Endangered Species Acts and federal Clean Water Act and Board policy, we recommend that the additional MM should require that the GAC implementation projects should be designed to avoid and minimize impacts to those resources to the maximum extent feasible.
8.	<ul> <li>IS/MND, Evaluation of Environmental Effects, Green House Gas Emissions, pp. 34-36</li> </ul>	We recommend augmenting the GHG emissions analysis to encompass any increases in GHG's due to operational energy use.
9.	<ul> <li>IS/MND, Evaluation of Environmental Effects, Hydrology Water Quality, pp. 39 to 45</li> <li>IS/MND, Evaluation of Environmental Effects, Utilities and Services, p. 58 (wastewater treatment requirements),</li> </ul>	<ul> <li>We recommend:</li> <li>adding a reference to the information relied upon to support the assumption that Backwash would be free of detectable levels of 1,2,3-TCP;</li> <li>expanding the discussion of all pollutants likely to be contained in the backwash to show that it is truly a low threat discharge, particularly given</li> </ul>

Ref No.	Representative list of Provisions Affected	Recommendation
	p. 59 (storm water drainage facilities)	<ul> <li>that MM 5 allows for PWSs to discharge the backwash to the storm drain upon approval of the storm drain operator;</li> <li>Because the analysis states that backwash will contain fines, which are prohibited from being discharged from storm drains to surface waters in certain quantities, we recommend that MM5 should be revised to require filtering of fine sediments prior to discharging to a storm drain;</li> <li>Because the discharge of backwash from a storm drain to a receiving water may require and NPDES permit, and may not be permitted by an applicable MS4 permit, we recommend that MM5 should be revised to clarify whether any NPDES permit coverage is required in addition to the approval of an MS4 operator, and, if so, to specify that such discharges can be made pursuant to and in compliance with the General Drinking Water NPDES Permit. In addition to the MM's specified in the section, compliance with the General Drinking Water NPDES Permit. In addition to the MM's specified in the section, compliance with the General Drinking Water NPDES permit. We receiving waters.</li> <li>We suggest that backwash discharges from storm drains to surface of ground waters may have insignificant rather than no impact on degradation of water quality.</li> </ul>
10.	<ul> <li>IS/MND, Evaluation of Environmental Effects, Noise, pp 47-49.</li> </ul>	<ul> <li>We suggest:</li> <li>The analysis should clarify that both construction and operational noise from pumping systems and disposal were taken into account in the evaluation;</li> <li>The noise from construction and operational impacts is likely to have some impact on ambient noise and receptors, but the impact is likely to be insignificant.</li> <li>Compliance with local agency (city and county) construction noise ordinances will assure full and effective mitigation of any construction noise.</li> </ul>
11.	• IS/MND, Evaluation of Environmental Effects, Transportation/Traffic, pp. 53-56	<ul> <li>We suggest:</li> <li>The types of potential construction traffic should be mentioned, and it should be noted that any additional construction related traffic</li> </ul>

Ref No.	Representative list of Provisions Affected	Recommendation
		impacts will be fully and effectively mitigated via compliance with local agency (city and county) construction traffic ordinances.
12.	• IS/MND, Evaluation of Environmental Effects, Utilities and Services, p. 60	We suggest fines and other solids from backwash may also have to be disposed of in landfills.
13.	• IS/MND, Evaluation of Environmental Effects, Cumulative Impacts, pp. 62-63	<ul> <li>We suggest:</li> <li>Clarifying that the cumulative impacts analysis considered all environmental factors and determined none of them to be cumulatively significant</li> <li>Reformatting the cumulative impacts section to be a stand-alone section so it does not appear to be part of the mandatory findings of significance section, and relate only to those findings.</li> </ul>

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Public Comment 1,2,3- TCP Deadline: 4/21/17 by 5pm

8 February 2017

State Water Resources Control Board 1001 | Street Sacramento CA 95812-2815

ECEIVE 4-19-17 SWRCB Clerk

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Dear Members of the Board:

I am writing to you about a chemical pollutant in California's precious water sources, 1,2,3 TCP.

You are all well aware we have a new President as of 20 January 2017. In a few short weeks we have learned that this aim of the new administration is to deregulate. Specifically, carve away environmental regulations designed to ensure that our water sources are clean and safe. **Our priority is clean air and water**, not deregulation of chemical pollutants.

The lesson from 20 January 2017 is that we, the citizens of California, must continue to be leaders in water and air quality standards. Clearly we must not let the lapse of federal regulation obstruct our leadership in clean water and clean air standards. Our state has the power to ensure that harmful chemicals are kept out of our vital water sources and those chemical contaminants already present in our water must be scrutinized and legally permissible levels are determined. This is your job: to ensure that California State Water Resources are kept at the highest standards possible.

I plead with you to regulate the amount of 1,2,3 TCP (a manmade proven carcinogen) in our water sources. (I am sure it comes as no surprise to you that measured 1,2,3 TCP levels are highest in rural, lower income communities where the source or 1,2,3 TCP (pesticides) were sold).

Please set the TCP drinking water standard at the current detection limit, 5 ppt. The protection of our water resources is vital for the public health of all Californians, and of generations to come. Clean water depends on your action: you have the power and with that power the responsibility to act. Water treatment costs will have to be recouped from the businesses responsible – those who sold the contaminated pesticides. The price of business is production plus waste.

Thank you very much for your consideration.

Best

Jo Anne Welsch, PhD 1409 McGee Avenue Berkeley CA 94703 jawelsch@gmail.com 510-527-2858

**Public Comment** 1,2,3- TCP Deadline: 4/21/17 by 5pm Ve cumber 23, 2016 John Fesuko 2)5 Ramina Are. El Cerrito, CA 94530 State Water Resources Control Board (001 I St Sacramento, CA 95812-2815 SWRCB Clerk Dear Members of the Board, I strongly suggest that you set the Orinking standard for 1,3TCP at 5pt in B order to protect our most subscribble citizens who struggle to find support in the Pace of corporate disregard for our environmental health. Please do the right thing - we are paying attention to your actions. Sinchely. Alm Mente

4/17/17

Public Comment 1,2,3- TCP Deadline: 4/21/17 by 5pm ECEIVE 4-19-17 SWRCB Clerk

**State Water Resources Control Board:** Dorene D'Adamo; Frances Spivy-Weber; Felicia Marcus; Steven Moore, and Tam Doduc

As a resident and a farmer in Del Rey, CA the safety of my community . is of great concern to me, especially that we are protected and safe from chemicals that are cancer-causing to our ground water and environment.

Being a farmer I would be the first to be exposed to such chemicals, it is important that my health must also be protected so that I can farm safely to feed my community and others. As a resident, if I am affected so is my family, my neighbors, my community. We did not create this cancer-causing agent, yet we are subjected to its devastating effects on our physical heaith. When a community's health is at stake where do we start to estimate the toll it has and will have on human lives?

Please hear our voice, as we request that you officially adopt the B proposed limit of 5 parts per trillion so that there is a reasonable standard to protect our communities from this cancer-causing pesticide 1,2,3-TCP.

Thank you, Kaihli Vang Del Rey Farmer & Resident

RECEIVE 4-19-17 SWRCB Clerk

Costs from the companies Mat sold contaninated pesticides.

unite you to venture lorta to Siskiyou Co. and. the head waters of the Sacramento River and may the falue ous Vater at Big Spring

В Sincercly and passionately Hatuleci Hyland 915 Cræd Road Oakland CA 941610

January 26, 2017 Dear Members of the Board, Mease greated our California water ways with Zeal water is the basis for all life on earth and we need to conserve out fiest water everywhere. Please set the TCP drinking Water standard at 5 ppr to protect public haulth A and allow water Systems to recoup unter treatment

Public Comment 1,2,3- TCP Deadline: 4/21/17 by 12 noon

ECEIVE

4-10-17 SWRCB Clerk

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April 10, 2017

#### Via U.S. Mail and Email

State Water Resources Control Board Attn: Ms. Jeanine Townsend P.O.Box 997377, MS 7400 Sacramento, CA 95899-7377 Email: commentletters@waterboards.ca.gov

# Re: Setting A Maximum Contaminant Level for 1,2,3-Trichloropropane of 5 parts per trillion

Dear Members of the Board:

The American Civil Liberties Union of California ("ACLU of CA") writes in support of the State Water Resources Control Board's (State Board) proposed regulation SBDDW-17-001; to establish a maximum contaminant level ("MCL") of 5 parts per trillion (ppt) for 1,2,3-Trichloropropane ("TCP"). This Board has detected 1,2,3-TCP, a contaminant associated with serious health consequences, in water sources throughout the state. At least 60% of contaminations were located in the agriculture-rich Central Valley.1 If the Board fails to adopt a California state-level MCL, marginalized and vulnerable populations will be disproportionately impacted. Accordingly, the ACLU of CA supports this Board's decision to adopt a 5 ppt standard for 1,2,3-TCP, which will adequately protect the health and safety of all Californians.

#### Adoption of a Standard for 1,2,3-TCP is Overdue

The State of California has been aware of the health risks associated with long-term exposure to 1,2,3-TCP for over two decades. As required by the California Safe Drinking Water and Toxic Enforcement Act (Proposition 65), in 1992 1,2,3-TCP was added to the list of chemicals known to the state to cause cancer. Almost twenty years later, in 2009, the California Office of Environmental Health Hazard Assessment (OEHHA) finally established a public health goal (PHG) for this dangerous contaminant based on a rigorous analysis of relevant scientific information.

Over the last several years, local community groups, affected water systems, and environmental justice groups have expressed concerns about continuing health effects caused by 1,2,3-TCP in water sources. Since May 2016, this Board has discussed proposed regulations at meetings in

<sup>1</sup> California State Water Resources Control Board, "Summary of 1,2,3-TCP Detections," <u>http://www.waterboards.ca.gov/drinking\_water/certlic/drinkingwater/123TCP.shtml (last retrieved April 4, 2017).</u>

ACLU OF SOUTHERN CALIFORNIA Hector Villagra, Executive Director 1313 West Eighth Street Los Angeles, CA 90017 (213) 977-9500 ACLU OF SAN DIEGO & IMPERIAL COUNTIES Norma Chavez-Peterson, Executive Director P.O. Box 87131 San Diego, CA 92138 [619] 232-2121 Setting Maximum Contaminant Levels for 1,2,3-Trichloropropane Page 2 of 4

Bakersfield, Fresno, Sacramento and Visalia. These discussions evidence a prioritization of the harsh realities of continued exposure to 1,2,3-TCP and the State's obligation to establish an MCL.

#### History of 1,2,3-TCP in California

1,2,3-TCP is a manmade chemical typically found at industrial or hazardous waste sites. It has been used as a cleaning and degreasing solvent, in addition to being associated with pesticide products. To date, 1,2,3-TCP has contaminated at least 562 drinking water sources in California.

Instances of contamination can be traced back to corporate practices prior to the 1980s, when earlier manufactured pesticides were applied extensively to farmland. Beginning in the 1950s through the 1970s, farms and agribusiness in California used dichloropropane-dichloropropene ("D-D") and dichloropropenes ("Telone") as soil fumigants to protect against nematodes. Scientific studies have revealed that 1,2,3-TCP was not a necessary ingredient for actively defending against nematodes; and was essentially a byproduct that led to water contamination without any productive use.

Even though pesticides containing 1,2,3-TCP have not been used for many years, the contaminant remains in the drinking water of many communities throughout California. The chemical makeup of 1,2,3-TCP makes it more likely to leach from soil into groundwater. This is especially true throughout agricultural regions in the Central Valley and Imperial County. Without any state or federal intervention requiring filtration or other systems of regulation, 1,2,3-TCP contamination will persist and affect residents' drinking water.

### 1,2,3-TCP Contamination Has a Disproportionate Impact on Communities of Color

Contamination has been detected primarily in rural areas of the state. Affected water sources are as far north as Butte County and as far south as San Diego County, but Fresno, Kern, Los Angeles, and Tulare Counties have the highest numbers of 1,2,3-TCP affected sources. Additionally, the contamination sites in these respective counties affect a disproportionate number of residents of color.

According to data from this Board, as of June 2016, the majority of affected water sources detected in Kern, Los Angeles and Tulare Counties were concentrated in just a few cities.2 In Kern County, 94.8% of contaminated water sources were located in the City of Bakersfield (45.5% Hispanic or Latino), the City of Shafter (80.3% Hispanic or Latino), and the City of Wasco (76.7% Hispanic or Latino). In Los Angeles County, where only 48.4% of residents are Hispanic or Latino, 56.7% of contaminated water sources were located in the City of Burbank, where 58.3% of residents are Hispanic or Latino.

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<sup>2</sup> See California State Water Resources Control Board, "Sources with two or more reported 1,2,3-TCP Detections" <u>http://www.waterboards.ca.gov/drinking\_water/certlic/drinkingwater/documents/123-tcp/123tcpforweb.xlsx</u> (last visited Apr. 4, 2017).

Setting Maximum Contaminant Levels for 1,2,3-Trichloropropane Page 3 of 4

Finally, in Tulare County, 89.6% of contaminated water sources were located in the City of Visalia (46.0% Hispanic or Latino), the City of Tulare (57.5% Hispanic or Latino), and the census designated place of Ivanhoe (81.0% Hispanic or Latino).

## Failure to Regulate 1,2,3-TCP in the Water is a Public Health Concern

Long-term exposure to 1,2,3-TCP can result in serious health consequences. The short-term effects of high exposure include irritation to the skin, nose, eyes, and throat, and drowsiness.<sup>3</sup> Long-term effects include increased risk of developing cancer as well as liver and kidney damage. In addition to being added to California's list of contaminants known to cause cancer, the U. S. District Court for the Eastern District of California has recognized 1,2,3-TCP as a carcinogen.<sup>4</sup>

Exposure occurs primarily through drinking or cooking with contaminated water, or through inhaling its steam while showering or washing dishes.5 Although OEHHA established a public health goal (PHG) representing the level at which 1,2,3-TCP in drinking water does not pose a significant risk to health over a lifetime of exposure, the standard is not legally enforceable and does little to mitigate the health concerns of community residents. Establishing a state-level MCL for 1,2,3-TCP is a necessary next step.

## The Board Must Set the Maximum Contaminant Level at 5 Parts Per Trillion

Given the dangers of 1,2,3-TCP, an enforceable drinking water standard is imperative. Currently, water providers are not required to treat 1,2,3-TCP contaminated water. Consumers can continue to be exposed, and without an enforceable maximum contaminant level, it is difficult to hold the responsible parties accountable. The decision of the Board to move forward on setting a standard is a valuable step in the right direction.

The State Water Resources Control Board is required to establish a contaminant's MCL at a level as close to the defined PHG as is technologically and economically feasible.6 The current PHG for 1,2,3-TCP, as determined by OEHHA in 2009, is 0.0000007 milligrams per liter (mg/L) or 0.7 ppt. We write in support of this Board's proposal to set an MCL of 0.000005 mg/L or 5 ppt; the strictest detection and treatment standard currently possible given existing technology. Given the presence of 1,2,3-TCP in water sources throughout the state, there is a serious need to set strict MCL standards and thereby provide all Californians with access to safe drinking water.

<sup>3</sup> Id.

<sup>4</sup> City of Fresno v. U.S, 709 F.Supp.2d 888, 925 (E.D. Cal. 2010).

<sup>5</sup> Clean Water Action, "1,2,3-Trichloropropane (1,2,3-TCP),"

http://www.cleanwateraction.org/sites/default/files/CA\_Fact\_Sheet\_TCP\_05.04.16a.pdf. (last visited Apr. 4, 2017). 6 Cal. Health & Safety Code Section 116365(a).

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Additionally, the analysis conducted by this Board supports the economic feasibility of implementing this standard.<sup>7</sup>

#### Conclusion

Regulating 1,2,3-TCP is a public health issue. Prolonged exposure increases the risk of cancer and may lead to kidney and liver damage in addition to depression of the central nervous system. In California, the historical use of dangerous pesticides containing 1,2,3-TCP has made agricultural communities more vulnerable to exposure. Additionally, water source contamination disproportionately impacts communities of color. These factors make clear that California is long overdue for setting a maximum contaminant level.

The State Water Resources Control Board has an obligation to set an enforceable standard that will protect all Californians. Information provided by this Board supports a maximum contaminant level of 5 ppt as economically feasible. Additionally, 5 ppt is the most protective standard that is currently technologically possible.8 The ACLU of CA supports the adoption of the most stringent standard possible. The cost of not doing so is too great. Thank you for your consideration.

If you have any questions, please do not hesitate to contact me at (559)554-2994 ext.205 or <u>kcador@aclunc.org</u>.

Sincerely,

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Kena C. Cador Equal Justice Works Fellow, Sponsored by Apple Inc. and O'Melveny & Myers ACLU of Northern California

<sup>7</sup> State Water Resources Control Board, "Initial Statement of Reasons 1,2,3-Trichloropropane Maximum Contaminant Level Regulations," (February 2017),

http://www.waterboards.ca.gov/drinking\_water/certlic/drinkingwater/documents/123-tcp/sbddw17\_001/isor.pdf. 8 State Water Resources Control Board, "123 TCP MCL Slide Presentation,"

http://www.waterboards.ca.gov/drinking\_water/certlic/drinkingwater/documents/123-tcp/tcp\_mcl\_presentation.pdf at slide 21 (last visited Apr. 4, 2017); Clean Water Action, "1,2,3-Tricholorpropane (1,2,3-TCP)"

http://www.cleanwateraction.org/sites/default/files/CA\_Fact\_Sheet\_TCP\_05.04.16a.pdf at 2 (last visited Apr. 4, 2017).



Board of Directors Lawrence A. Watt, President Christy Guerin, Vice President Edmund K. Sprague, Treasurer Gerald E. Varty, Secretary Robert F. Topolovac, Director



April 21, 2017

General Manager Kimberly A. Thorner, Esq. General Counsel Alfred Smith, Esq.

CEIVE 4-20-17 SWRCB Clerk

State Water Resources Control Board Attn: Jeanine Townsend, Clerk of the Board 1001 I Street, 24th Floor Sacramento, CA 95814

VIA EMAIL: commentletters@waterboards.ca.gov

Re: Comment Letter – Proposed Rulemaking - 1,2,3-Trichloropropane Maximum Contaminant Level

Dear Ms. Townsend,

On behalf of Olivenhain Municipal Water District, thank you for the opportunity to provide the State Water Resources Control Board with input on the proposed rulemaking on 1,2,3-Trichloropropane Maximum Contaminant Level. OMWD provides 84,000 customers in northern San Diego County with water, wastewater, recycled water, hydroelectric, and recreational services.

OMWD has many concerns about the proposal including the potential impacts to daily operations, unknown capital improvements necessary for compliance, and the costs that will ultimately be borne by ratepayers across the state. The very short amount of time to bring operations into compliance before the possibility of being deemed in violation is also a matter of great concern.

Following implementation of the 1,2,3-TCP MCL, at the point in which routine monitoring for 1,2,3-TCP reveals detection above the notification level of 500 ppt, OMWD customers will need to be notified. Following detection levels above the MCL of 5 ppt, OMWD's David C. McCollom Water Treatment Plant, which utilizes ultrafiltration membrane technology, will need to be shut down until capital improvements are implemented to allow treatment below the MCL. During this time, while its treatment facilities sit idle, OMWD will be required to utilize expensive, treated water connections from San Diego County Water Authority to meet all demands, incurring additional expenses for ratepayers.

One hundred percent of OMWD's DCMWTP treated water flow stream of 34 MGD would require treatment via granular activated carbon, which would require a GAC system to be designed and constructed as a new process at the existing facility. Using the State Administrative Manual Cost Estimating Methodology and Cost Curves, the estimated capital costs to OMWD to install a GAC system are \$10.62 million. Estimated additional operations and maintenance costs are \$2.25 million per year, although due to the complex configuration of OMWD's DCMWTP, both capital and annual costs may be higher.



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The timing of this regulation is also of the utmost concern for most water agencies. If adopted in 2017, the draft regulation would require water agencies to monitor for 1,2,3-TCP beginning in January 2018. Because of the short time period between adoption and expected compliance, many affected water systems would be in violation of the new standard soon after monitoring begins, as it is not feasible to install appropriate water treatment systems to comply with the MCL within the time allotted. The steps to properly install necessary treatment include identifying and evaluating available technologies, pilot testing, designing treatment facilities, budgeting expenses, obtaining permits and environmental review, and constructing new treatment systems. All of this can take years and require significant financial investment by ratepayers.

Higher up-front capital costs are not the only burden that the proposed MCL would place upon ratepayers. Ongoing treatment costs can be greatly impacted by operational practices such as GAC treatment, identified in the rule as the best available technology for this contaminant. Further, the requirements that the State Board would impose as part of implementing this regulation must give full consideration to operational requirements including incorporating "nondetects" in averaging for MCL compliance, turn-around times between sampling and certification, obtaining outside laboratory results, and meeting blending objectives.

In addition to being subject to State Board enforcement actions, there are significant adverse impacts when a water agency is deemed out of compliance with a public health-based drinking water standard. Further, the water agency is subject to legal liability and lawsuits (lawsuits filed by California River Watch against the cities of Livingston and Vacaville are two examples). In addition, public confidence in the safety of their drinking water may be seriously undermined along with their confidence in their water supplier.

OMWD strongly recommends that the State Board amend the proposed rule to provide a specific, reasonable time period to enable water agencies to comply with the new 1,2,3-TCP MCL before they may be deemed in violation. If you or your staff should need any additional details pertaining to this assessment, please do not hesitate to contact me at 760-753-6466 or kthorner@olivenhain.com.

Regards,

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Kimberly A. Thorne General Manager

CC: Kim Craig, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown, Jr. Assemblywoman Marie Waldron Assemblyman Rocky Chavez Assemblyman Brian Maienschein Assemblyman Todd Gloria Senator Pat Bates Senator Joel Anderson

#### Senator Toni Atkins

Mark Muir, Board Chairman, San Diego County Water Authority Tom Howard, Executive Director, State Water Resources Control Board Eric Oppenheimer, Chief Deputy Director, State Water Resources Control Board Planning and Performance

Dave Bolland, Director of Regulatory Relations, Association of California Water Agencies

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ECEIVE

4-21-17 SWRCB Clerk





April 20, 2017

Felicia Marcus, Chair State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0100

### Re: 1,2,3 -Trichloropropane MCL – "Grandfathering" monitoring data

Dear Chair Marcus and Board Members Doduc, Moore, D'Adamo, and Esquivel:

We are writing to express our view on the issue of allowing water systems to use TCP monitoring data collected before the MCL is adopted, which was brought up before the Board during the workshop held on April 18<sup>th</sup>.

As we all indicated in our oral testimony, moving forward with both the adoption and implementation of the MCL is critical given the continued public exposure to a particularly potent carcinogen. The Division of Drinking Water (DDW) demonstrated their understanding of this when they recommended to potentially contaminated water systems that they begin monitoring as a means of determining if they had TCP detections and if so, characterizing the level of the problem. While there could be some fluctuations in contaminant levels over time, we believe that the monitoring done provides a reliable picture of where TCP is occurring. In addition, once it becomes a regulated contaminant, a degree of monitoring will continue in vulnerable regions.

Our organizations support amending Title 22, Section 64445 (Initial Sampling – Organic Chemicals) as "to allow limited 'grandfathering' of monitoring data collected prior to the effective date of any regulation establishing an MCL for an organic chemical". This will establish a method for public water systems to substitute existing monitoring results to meet initial requirements under certain conditions, fundamentally allowing water systems to "hit the ground running once the MCL goes into effect.

We see this grandfathering amendment as a well calibrated policy that incentivized early monitoring and planning for the ultimate regulation. We respectfully disagree with those who oppose the amendment and would be disappointed to both slow down potential early action by impacted systems to comply with the MCL, or to add more of a financial burden

than is necessary to water providers who are now moving toward investments in treatment.

Sincerely,

Andria Ventura

Andria Ventura Toxics Program Manager Clean Water Action

Havrel Airestone

Laurel Firestone Co-Executive Director Community Water Center



Planned Parenthood Mar Monte

April 18, 2017

Felicia Marcus, Chair State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0100

#### Re: 1,2,3-Trichloropropane MCL – Support 5 ppt

Dear Chair Marcus and Board Members Doduc, Moore, and D'Adamo:

The undersigned organization, on behalf of the hundreds of thousands of Californians they represent, urge the State Water Resources Control Board to adopt the Division of Drinking Water's proposed **5 part per trillion** (ppt) maximum contaminant level ("MCL") for 1,2,3-trichloropropane ("TCP") with all expediency. TCP is a solely man-made chemical that puts the health of Californians in at least 16 counties served by almost 100 water systems at risk.1

#### 1,2,3-TCP is a known human carcinogen

Since 1992, California has recognized TCP as a chemical "known to the State to cause cancer" under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65, 1992).<sub>2</sub> Concluding that "1,2,3-TCP represents a significant carcinogenic risk when it occurs in drinking water," the California Office of Environmental Health Hazard Assessment ("OEHHA") issued a Public Health Goal (PHG) for TCP in drinking water of 0.7 ppt in 2009.<sub>3</sub> According to the State Water Board's Standardized Regulatory Impact Assessment, "[e]xposure to concentrations of 1,2,3-TCP in drinking water that exceed the PHG will result in an increased risk for cancer."<sup>4</sup> To protect Californians from an increase in lifetime cancer risk due to TCP in water, the State Water Board should adopt an MCL **no greater than 5 ppt**, which is the detection limit for reporting purposes ("DLR").

#### Disproportionate impacts in agricultural regions

Although small quantities of TCP have reportedly been used for industrial purposes, most of the TCP pollution of California's groundwater is the result of its presence as an unnecessary impurity in soil fumigants manufactured by Shell Oil Company and Dow Chemical Company. These fumigants were used extensively in California from the 1950s through the 1980s. Shell and Dow neglected to disclose to farmers that TCP was a contaminant in their products or the harm it posed to human health.

TCP has been detected all over California, but more than half of the state's contaminated wells are found in the agriculturally rich San Joaquin Valley, particularly in Kern, Fresno, and Tulare Counties.<sup>5</sup> TCP is not the only pollutant affecting water supplies in these rural, lower-income regions where residents are already threatened by disproportionate exposure to contaminated water and other pollution, and often lack the adequate resources to address these problems or the associated medical consequences.

Final SRIA 10062016.pdf



www.oomarmonte.org

<sup>1</sup> http://www.waterboards.ca.gov/drinking\_water/certlic/drinkingwater/123TCP.shtml.

<sup>2</sup> https://oehha.ca.gov/media/downloads/proposition-65//p65single01272017.pdf, pg. 21.

<sup>3</sup> https://oehha.ca.gov/water/public-health-goal/final-public-health-goal-123-trichloropropane-drinking-water 4 http://www.dof.ca.gov/Forecasting/Economics/Major Regulations/Major Regulations Table/documents/

<sup>5</sup> The exception to this is Los Angeles County, which is the second most effected in the state.

#### Costs to water systems and the public should NOT change the 5 ppt recommendation

Health & Safety Code §116365(a) requires the State Water Board to establish a contaminant MCL as close to its PHG as is technologically and economically feasible, placing primary emphasis on the protection of public health. Given TCP's DLR, it is not technically feasible to set the MCL lower than 5 ppt. The only other factor the Board is permitted to consider is cost.

Because TCP is synthetic, manufactured chemical that does not occur naturally, viable responsible parties have been identified, and affected water suppliers have available legal remedies to recoup water treatment costs, choosing to allow greater cancer risk because of the economic factors benefits only the responsible parties. In fact, setting the MCL at 5 ppt would expedite cost-recovery efforts that have been pending for years, while providing strong health protection and limiting medical costs. Furthermore, the state's office of sustainable water solutions and complementary TA program is perfectly situated to ensure that small communities share in the benefits of drinking water free of this harmful carcinogen.

#### Adopt a health-protective MCL as soon as possible

The SWRCB's Standardized Regulatory Impact Assessment said, "Based on the inability to obtain alternative sources of drinking water, disadvantaged communities would continue to use and consume drinking water containing high levels of 1,2,3-TCP. In disadvantaged or severely disadvantaged communities, the incidence of cancer cases over a lifetime would be greater as compared to other impacted communities. Therefore, the proposed regulation would offer the most health benefit to these types of communities." Given that the state has recognized the dangers of TCP since 1992, it is critical to expedite water supply treatment so as to minimize and mitigate the harm to people who depend on water supplies contaminated with TCP. Consequently, the adoption of a 5 ppt MCL should not be delayed any further.

Thank you for your consideration.

Sincerely,

#### Retired Senator Liz Figueroa,

Vice President of Public Affairs for CA & Northern Nevada Planned Parenthood Mar Monte 1605 The Alameda San Jose, CA 95126 Office: 1-916-325-1734 Cell: 1-408-658-5399



Public Comment 1,2,3- TCP Deadline: 4/21/17 by 5pm



Tender & Thoughts, 18093385 TECB20954400G EADC LLC

2/2/17 Dear members of the board. 1,2,5 TCP is a man made Product that infects Water in 372 Water Sources, Wow! B Stop 1,2,3 TCP So all of US can be Safe, Plus Pestacides are bad for Many Other things than Water Poisening! like The decrease of the population of bees and They can poison food from Water including: fish, crab(yum) and clams, and it has a Part in Pollution so, Stop TCP More Now! Save us all !!! -Lucy age q



# CALIFORNIA RURAL LEGAL ASSISTANCE, INC.

FIGHTING FOR JUSTICE, CHANGING LIVES

March 30, 2017

Ms. Jeanine Townsend, Clerk of the Board State Water Resources Control Board P.O. Box 997377 MS 7400 Sacramento, CA 95899

VIA ELECTRONIC MAIL TO: commentletters@waterboards.ca.gov

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

Dear Ms. Townsend,

California Rural Legal Assistance, Inc. (CRLA) writes in response to the notice of proposed rulemaking and request for public comment on the proposed Maximum Contaminant Level for 1,2,3, Trichloropropane (123 TCP). CRLA's Community Equity Initiative works directly with residents in rural communities in the San Joaquin Valley whose groundwater supplies are contaminated with 123 TCP. CRLA commends the State Water Resources Control Board (SWRCB) for their work in developing a maximum contaminant level (MCL) for 123 TCP and, in doing so, for protecting the health of the residents CRLA serves. We offer the following comments on the proposed regulation.

#### I. The SWRCB Must Adopt the Five Parts Per Trillion MCL

Health and Safety Code §116365(a) requires that a contaminant MCL be established as close to the Public Health Goal (PHG) and as protective for human health as is technologically and economically feasible. The Office of Environmental Health Hazard Assessment has established a Public Health Goal of .7 parts per trillion for 123 TCP.

Some laboratories have successfully developed analytical techniques that can detect 123 TCP at the PHG level of .7 parts per trillion, but detection at this level is cost-prohibitive on a large scale as this technology is not widely available. Instead, the proposed MCL of 5 parts per trillion is generally considered the lowest concentration of TCP that can be reliably and economically detected, which primarily occurs using two gas chromatography/mass spectrometry methods developed by the California state Sanitation and Radiation Laboratories.

Five (5) parts per trillion is the closest detection and treatment level to the PHG that is economically and technologically feasible, so the SWRCB must adopt this standard in accordance with Health and Safety Code §116365(a). The proposed MCL of 5 parts per trillion complies with §1116365(a) and represents the most health-protective level currently possible for impacted communities.



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# II. Public Water Systems That Have Previously Detected Contaminants Should Not Be Permitted to Substitute Past Testing Data for Their Initial MCL Reporting Requirements

Proposed changes to 22 CCR § 64445 would permit water systems to substitute existing monitoring data to satisfy the initial monitoring requirements of §64445 when a new MCL is established. Water systems with existing groundwater monitoring data would be permitted to substitute up to three of the mandatory four quarterly samples taken during the first year of monitoring, so long as the substitute samples were taken during the same quarterly period (i.e. first quarter, second quarter) and within the last two years. The SWRCB states that this change is proposed to encourage pre-emptive monitoring and to reduce sampling and analytical costs for water systems during the initial monitoring period. (Initial Statement of Reasons pg. 23)

CRLA recognizes that the SWRCB seeks to reduce the costs for water systems as they comply with regulatory requirements. The additional costs of water monitoring and treatment are frequently passed on to consumers in the form of increased utility rates, which may be unaffordable for residents in low-income communities. Cost-saving mechanisms can reduce the chances that these extra financial burdens will be passed on to communities that simply cannot afford them.

The SWRCB proposal to allow water systems to save money by substituting old data, however, comes at the price of endangering the health of residents. Levels of 123 TCP found in groundwater sources can vary drastically between quarters and between years. Allowing systems that have a history of 123 TCP contamination to substitute past data will not provide a clear picture to the SWRCB, the affected communities, or the general public of the current status of 123 TCP contamination in groundwater sources. This risks resident exposure to dangerous levels of the contaminant for longer than would be the case if contaminated systems were required to complete all four quarters of monitoring in the initial monitoring period.

One example of the variability of 123 TCP in a groundwater source across quarters and years can be found in the sampling data from Del Rey, a disadvantaged unincorporated community in southeast Fresno county. Del Rey first detected 123 TCP in its groundwater sources in 2007 and has been monitoring five of its wells for 123 TCP quarterly since mid-2012. The following data table shows the monitoring results from six consecutive quarterly samples taken from Well # 7 between 2013-2015. All data is shown in UG/L.

Date of Sample	123 TCP concentration in UG/L
10/9/2013	0.007 (7 ppt)
1/2/2014	0.012 (12 ppt)
4/9/2014	0.023 (23 ppt)
7/9/2014	0.01 (10 ppt)
10/8/2014	0.013 (13 ppt)
1/14/2015	0.022 (22 ppt)

This example indicates that the levels of 123 TCP measured vary greatly between quarters and across years. Comparing a January 2014 and January 2015 sample indicates that the quantity of contaminant present can vary widely even within the same quarter across years, so that hypothetically, if the 5 ppt MCL were to have taken effect in 2015 and January 2014 data were permitted to be substituted in place of a January 2015 sample during the initial monitoring period, the water district, the residents, the SWRCB, and the general public would not be informed that the 123 TCP levels had nearly doubled in Well 7 over the past year. This would lead to an underestimate of the average 123 TCP currently present in the groundwater system. It is significant that if January 2015 testing had been required rather than use of substitute data, the district would have immediately been in violation of the MCL because the 123 TCP present in January 2015 is more than four times higher than the proposed MCL of 5 ppt. Residents in this hypothetical would have a right to notice of the contamination immediately after submission of a January 2015 sample, but not after submission of a January 2014 sample. While this is a hypothetical example, there is every reason to believe that this type of situation could happen if substitute data were used, given the fluctuation of TCP levels across quarters and years.

Underestimating the amount of a contaminant present in the water system could ultimately deprive residents of the notice of the contamination to which they have a right under 22 CCR 64463 and of the benefits of remediation efforts to reduce the levels of the contaminant in the water. Permitting such a scenario runs counter to the State's obligation under Health and Safety Code §1116365(a) and (b) to place a primary emphasis on the protection of public health and to take measures to avoid any significant risk to public health caused by carcinogenic contaminants.

Striking a balance between protecting the health of residents in communities with contaminated groundwater sources and relaxing financial burdens on disadvantaged communities, the SWRCB should permit data substitutions for public water systems only if the systems has actively tested for the newly-regulated contaminant for at least the past three years and has found no detection of the contaminant within that time frame. This would allow uncontaminated water systems to avoid the unnecessary cost of re-testing each quarter during the initial monitoring stage while still requiring contaminated systems to provide current data on the status of their groundwater sources.

#### III. The State Should Provide Financial Assistance to Disadvantaged Communities for Remediation Efforts

#### a. 123 TCP disproportionately impacts rural low-income communities of color

Hundreds of wells throughout the San Joaquin Valley have tested positive for 123 TCP. 123 TCP was added to pesticides throughout the 1980s and 1990s, and these pesticides were subsequently used throughout the Valley, so rural agricultural communities have been particularly adversely affected by the contamination. These communities, with which CRLA has been working for more than fifty years, are comprised primarily of low-income residents, farmworkers, immigrant communities, mono-lingual Spanish-speakers, and other Limited English Proficiency populations.

Residents in rural communities face multiple and overlapping obstacles to opportunity including, but not limited to, lack of access to services, infrastructure, healthy and affordable housing, quality education, and livable incomes. 2015 American Community Survey data shows that the median household income of residents in Del Rey, California is \$23,616, compared to a statewide average of \$61,818. The City of Arvin, another rural community in

the San Joaquin Valley that has groundwater sources contaminated with 123 TCP, has a median household income of \$35,609.

Rural communities, low income communities, especially racial and ethnic groups, are also disproportionately affected by environmental burdens such as 123 TCP contamination. CalEnviroScreen 3.0—a tool developed by the California Office of Environmental Health Hazard Assessment to identify the communities in California most significantly impacted by environmental burdens—consistently ranks communities in the San Joaquin Valley in the top twenty-five percent of the most pollution-burdened areas of the state. Del Rey, for example, is ranked in the top ten percent of most pollution-burdened communities in the state. The City of Arvin is placed in the top twenty-five percent of environmentally burdened communities. Both also have groundwater contaminated with 123 TCP.

#### b. 123 TCP remediation costs will be high and will likely be passed on to residents

Remediation costs for 123 TCP contamination will be high, and these costs will likely be passed on to consumers in the form of rate increases. SWRCB remediation cost estimates place the estimated increased cost-burden per connection for TCP remediation at \$609.00 annually for small water systems of less than 200 connections and \$25.00 for large water systems of more than 200 connections.

The SWRCB cost estimates likely underestimate the actual costs for treatment for several reasons. First, the SWRCB overestimates the effect of economies of scale on medium-sized water systems. The cost estimates place water systems into overly-simplified categories of small systems with less than 200 connections and large systems with more than 200 connections, assuming over \$500 difference annually in the cost of connections between the two.

Economies of scale will greatly reduce the cost per connection for residents in large contaminated cities, yet the effect will be different for a community with 500 connections than for a metropolitan area with 100,000. Both the community of Del Rey and the City of Fresno are considered the same category of "large systems" with an estimated cost increase annual of \$25.00. Del Rey uses 5 wells to serve around 350 connections. The City of Fresno uses 260 wells to serve 500,000 people. Residents of Del Rey may not experience a \$609.00 annual increase estimated for systems with less than 200 connections, but it is likely that, given the small size of their system, their annual increase will be closer to that number than to the estimated \$25.00 annual increase that large metropolitan areas such as Fresno. Therefore, the current cost estimates given by the SWRCB likely underestimate the financial impact on residents in communities like Del Rey.

Second, the SWRCB treatment estimates do not include overhead and maintenance costs, costs for land acquisition, or site-specific costs. These additional costs can be substantial and may significantly increase the costs borne by residents in contaminated communities. Del Rey, for example lacks sufficient space at four of the five active well sites to construct the necessary Granulated Active Carbon (GAC) vessels, backwash reclaim tanks, and chlorination systems required for 123 TCP treatment and also have sufficient space for GAC delivery trucks. The Del Rey Community Service District must purchase additional property, including potentially purchasing a residential lot from a local resident, to accommodate the treatment plants. These additional costs are likely to be experienced by many communities, especially small districts that lack large parcels for their treatment facilities.

Overhead and maintenance(O&M) costs will also be significant and will likely be passed on to consumers. In Del Rey, engineers have estimated O & M costs for 123 TCP remediation over 40 years at more than \$7.7 million, with

a total cost for capital and O & M together reaching over \$18 million. This estimate suggests that O & M costs for 123 TCP treatment in general will be costly to maintain. Excluding estimated O & M costs in its analysis, the SWRCB has underestimated the cost that will be passed on to consumers in contaminated communities.

#### c. The SWRCB underestimates the impact that increased utility rates will have on disadvantaged communities

The SWRCB acknowledges in its Initial Statement of Reasons that the cost implications for 123 TCP remediation will have a disproportionate impact on small communities, and the "estimated annual cost of \$609 per connection could represent a significant financial burden to some California communities." The SWRCB is dismissive of the real impact of cost increases, however, in its analysis of the application of CA Water Code Section 106.3 to the proposed regulation.

CA Water Code §106.3 states that:

(a)It is hereby declared to be the established policy of the state that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes...

(b) All relevant state agencies, including the department, the state board, and the State Department of Public Health, shall consider this state policy when revising, adopting, or establishing policies, regulations, and grant criteria when those policies, regulations, and criteria are pertinent to the uses of water described in this section.

Analyzing the relationship between WCW 106.3 and the proposed 123 TCP MCL, the SWRCB states that "the State Water Board has considered this statewide policy and determined the proposed regulations will further the stated policy." (Initial Statement of Reasons pg 32) To support this conclusion the SWB states

"Even though the proposed regulations may result in increased costs to those that are served by PWS that have to install treatment to address 1,2,3 TCP, *that potential cost is outweighed by the benefits of having a source of water that does not contain a known carcinogen*" (Initial Statement of Reasons, pg 32- Emphasis added)

The statement that the "potential cost is outweighed by the benefits" does not give the appropriate weight to the "affordable" component of the rights enshrined in CWS §106.3, and seems to suggest that so long as the cost is "worth it" for residents it is somehow affordable. This suggests that the SWRCB does not recognize the levels of poverty in rural areas of the San Joaquin Valley impacted by 123 TCP contamination and does not fully appreciate the impact that rate increases can have on low-income families. Increased financial burdens that are unaffordable remain unaffordable even when paying for essential services like clean water.

Rural communities already pay more for utilities than larger metropolitan areas due to the latter benefitting from economies of scale. The disproportionately high rates that rural residents pay for services like water is especially true in smaller communities. CRLA has worked with the small communities of El Porvenir and Cantua Creek in rural Fresno county, where low-income residents have historically paid \$75-100 monthly for water service even though their drinking water was contaminated and unusable.

Rural low-income residents in areas adversely affected by 123 TCP contamination experience significant overlapping obstacles to opportunity, including financial obstacles. Approximately 71% of low-income households in Fresno County overpay for rent. Low-income families are already overstretched financially and an increase in monthly utility bills will lead to some families simply being unable to pay them, or being forced to choose between paying utility bills or other essential costs such as rent, health care, child care, or food. When residents are unable to cover all their financial obligations it increases the risk of homelessness and displacement, which has devastating effects on families and communities. SWRCB should not underestimate the impact that increased utilities fees will have on the communities impacted by 123 TCP contamination.

#### c. The SWRCB should provide financial assistance to disadvantaged communities impacted by 123 TCP

The SWRCB acknowledges in its Initial Statement of Reasons not only that the cost of treatment for 123 TCP may be "economically infeasible" for small water systems, but that economic assistance provided by the state in the form of grants and low-interest loans will be crucial to help alleviate the financial burden these communities will face as they begin remediation efforts. (Initial Statement of Reasons pg 23)

Water Code Section 106.3 does not expand the obligations of the state to provide additional resources to develop water infrastructure, but the state must take seriously its obligation to consider the human right to affordable, clean, water when "designing revising, adopting or establishing policies, regulations, and grant criteria" (S. 106.3 (c))

Rural disadvantaged communities have been particularly affected by 123 TCP contamination, and as state resources will be crucial to prevent the costs of remediation being passed on to already-overburdened low-income residents, the state should make funding available for disadvantaged communities to finance monitoring and remediation efforts. Low-income residents simply cannot afford to shoulder the economic burden of remediation.

If the state decides to explore options to off-set the costs of providing financial assistance for 123 TCP remediation, the state should not utilize taxes on bottled water to generate funds. Residents that live in contaminated communities already must purchase bottled water to cook with, drink, and bathe with, and should not be taxed on these purchases to pay for remediation efforts. The state should seek additional public input on methods to raise the necessary funds that do not create additional burdens on contaminated communities.

#### **IV.** Conclusion

The SWRCB proposes an MCL that protects the health of residents in rural disadvantaged communities relying on contaminated groundwater sources. The state must adopt the MCL at 5 parts per trillion to comply with its legal obligations under Health and Safety Code §116365(a). The proposed regulation should allow water systems that have tested for contaminants for at least three years and have found no contamination to substitute data from prior tests for their initial monitoring requirements as a cost-saving measure. However, to protect public health, systems that have previously identified contamination should not be allowed to do so. Finally, the State should provide financial assistance for disadvantaged communities contaminated with 123 TCP so that low-income residents are not further financially overburdened with the costs of remediation.

CRLA appreciates the opportunity to provide comment on the proposed regulation.

Sincerely,

Mariah C. Thompson

Staff Attorney, Community Equity Initiative California Rural Legal Assistance, Inc. 3747 E. Shields Ave, Fresno CA, 93726 Phone: (559) 233-6710 Email: Mthompson@crla.org

CC: Ilene Jacobs, Director of Litigation, Advocacy, and Training, California Rural Legal Assistance, Inc. jjacbobs@crla.org

Marisol Aguilar, Co-Director, Community Equity Initiative, California Rural Legal Assistance, Inc. maguilar@crla.org

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State Water Resources Control & Board 25

2002 1 Street Sacramento, CA 95812-2815 2-6-17

Dear Members of the board,

I think that everyone should have clean water. Please set the TCP B drinking water standard at 5 ppt to protect public heath. I really hope you can do that.

Sincerely.

Mase Milham (11 years old) 906 Teresita Blud SF CA 94127



CHINO BASIN

DESALTER AUTHORITY

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Submitted via electronic mail to commentletters@waterboards.ca.gov

Ms. Jeanine Townsend Clerk to the Board State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95814

## RE: 1,2,3-Trichloropropane Maximum Contaminant Level (SBDDW-17-001)

Dear Ms. Townsend:

The undersigned water supply agencies appreciate this opportunity to submit comments to the State Water Resources Control Board (Water Board) on the proposed regulatory action to establish a Maximum Contaminant Level (MCL) for 1,2,3-Trichloropropane (1,2,3-TCP). The undersigned agencies provide retail and wholesale water supply services to a collective population of 650,000 residents in western San Bernardino and Riverside counties.

Our agencies support and join the comments submitted by the Association of California Water Agencies (ACWA). Like ACWA, we support the regulation of contaminants that are known health hazards in drinking water, and we support the adoption of the proposed MCL for 1,2,3-TCP.

However, we are deeply concerned that the proposed regulation does not provide adequate time needed to undertake major compliance actions, such as designing, financing and constructing water treatment facilities, to comply with the new regulation before a public water system is found to be in violation of the new MCL. Typically, at least two years are required for public agencies to raise sufficient funds, complete environmental review, bid construction contracts, and complete installation of treatment systems. In the interim, under the proposed regulation our agencies will be forced into noncompliance, which will require us to either turn off wells and/or notify our customers that their water no longer meets public health requirements. The result of such noncompliance is a severe reduction in water supply reliability, liability to lawsuits, and a loss of public trust.

Nor does the proposed regulation clearly identify the range of actions that may be taken to achieve compliance, including system blending. Blending has been used successfully by many water suppliers to achieve compliance with other water quality standards. The Water Board, in its July 2016 public workshop presentations, recognized blending as an option for compliance. However, the proposed regulation does not include blending as a best available technology (BAT), nor does it provide guidance on how blending could be used to achieve compliance.



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#### RE: 1,2,3-Trichloropropane Maximum Contaminant Level (SBDDW-17-001) City of Chino, Chino Desalter Authority, Monte Vista Water District April 21, 2017

We share the concerns about the serious public health impacts of 1,2,3-TCP and have already initiated steps to investigate the extent to which our water supplies are impacted by this chemical and to assess the specific scope and treatment facilities that will be required to be constructed in order to achieve compliance.

The reality is that the proposed MCL will result in significant financial and water supply reliability impacts for our agencies (see attached). We request the Water Board's help in mapping out acceptable compliance strategies and a reasonable period of time in which to implement these strategies before being found in violation of the MCL. We specifically ask that the Water Board take the following actions:

<u>Amend the proposed rule to provide a specific, reasonable time period for public</u> water systems to achieve compliance with the new 1,2,3-TCP MCL before being <u>deemed in violation</u>. Public systems typically need 2-3 years to construct the infrastructure to achieve compliance. At the very least, the proposed rule should provide a compliance pathway similar to the one established for hexavalent chromium VI by SB 385 (Chapter 282, Section 116431 of the Health and Safety Code) in which the Water Board can review and pre-approve compliance plans to provide adequate time to construct treatment facilities before a system is deemed in violation. This compliance pathway includes public notice as well as the specific actions and timeframe in which compliance will be achieved.

 Amend the proposed rule to clarify that system blending may be used to comply with the new 1,2,3,-TCP MCL as presented in the Board's workshops. Since the new MCL is set at the current testing capacity to detect 1,2,3-TCP in water supplies, it is important the rule also provide guidance for how to use blending to achieve compliance.

Thank you for considering our comments. Should you have any questions, please do not hesitate to contact Mark Kinsey, general manager of Monte Vista Water District, at mkinsey@mvwd.org or (909) 624-0035; Amanda Coker, associate engineer of City of Chino, at acoker@cityofchino.org or 909-334-3508; or Curtis Paxton, general manager of Chino Basin Desalter Authority, at cpaxton@chinodesalter.org or (909) 218-3729.

Sincerely,

Matthew Ballantyne, City Manager City of Chino

Curtis D. Paxton, General Manager / CEO Chino Basin Desalter Authority

Arast 7

Mark Kinsey, General Manager Monte Vista Water District

Attachment

#### RE: 1,2,3-Trichloropropane Maximum Contaminant Level (SBDDW-17-001) City of Chino, Chino Desalter Authority, Monte Vista Water District April 21, 2017

#### **Attachment**

The proposed MCL will result in significant financial and water supply reliability impacts for our agencies. We currently are attempting to assess the specific scope and treatment facilities that will be required to be constructed in order to achieve compliance. The below estimates, presented for purposes of illustration, are based on the installation of the proposed best available technology (BAT), granular activated carbon, identified in the proposed regulation on all impacted wells:

#### City of Chino

- Number of wells impacted:
- 12 wells (all City wells impacted) 17,000 gpm
- Total impacted well capacity: 17,000
  Percentage of total available supply: 80%<sup>1</sup>
- BAT treatment cost: \$15 million<sup>2</sup>

#### Chino Desalter Authority

- Number of wells impacted: 7 wells
- Total impacted well capacity: 2,500 gpm
- Percentage of total available supply: 15%
- BAT treatment cost: \$2.5 million

#### Monte Vista Water District

- Number of wells impacted: 7 wells
- Total impacted well capacity: 9,900 gpm
- Percentage of total available supply: 33%
- Estimated BAT treatment cost: \$12.5 million

<sup>&</sup>lt;sup>1</sup> Includes City-supplied groundwater and purchased water supplied by the Chino Basin Desalter Authority, which is also impacted by 1,2,3-TCP – see above.

<sup>&</sup>lt;sup>2</sup> Assumes blending is recognized as a BAT for 1,2,3 TCP and is utilized at two (2) City wells.



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	SWRCB Clerk

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Vielanda Roy 133 McKay Rd Aptos, CA 95003-9740

Hello ~

Lan Urging you to take appropriate Action to protect ALL of Crutifornia communities from the known curcinogon TCP. We need to limit our exposure & hold accountable those who have polluted our waters. Sincurely. Menuals Par





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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#### THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Jeanine Townsend Page 2 April 21, 2017

to address1,2,3-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 <a href="mailto:mstewart@mwdh2o.com">mstewart@mwdh2o.com</a> or (213) 217-5696.

Very truly yours,

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





ecember 20, 2016

State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

Dear Members of the Board:

Given the both the toxicity of 1,2,3 TCP and its prevalence in California drinking water sources, I urge you to set a restrictive limit on its presence.

Extensive peer-reviewed research, dating back to at least 1992 -- and validated many times since, indicates adverse affects of TCP on both kidney and liver function, as well as its carcinogenic properties.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold pesticides manufactured with or contaminated by TCP, and from industrial users who fail to dispose of it properly.

Thank you for your consideration.

sincerely, (

Michael Biczynski 3232 Encinal Ave. Alameda, CA 94501





R	
	4-20-17
	SWRCB Clerk

336 Pacific Avenue - Shafter, California 93263

April 20, 2017

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

Dear Ms. Townsend:

This letter is being sent as a formal, written response to the "Notice Of Proposed Rulemaking" which covers a public health standard for 1,2,3-trichloropropane ("TCP"). The City of Shafter understands that the proposed maximum contaminant level under consideration is 5 parts per trillion (ppt) and that the State is accepting comments on this proposal through April 21, 2017.

The City appreciates the State's concerns about TCP and its efforts to develop a health standard for it because it has been detected in Shafter's water supply for over 20 years and it is present at all of our wells. Even without a standard in effect right now, we have taken a very proactive stance on dealing with this health issue with staff, funding and other resources. Our first full-scale TCP treatment system at one well was installed in 2013 and we were piloting TCP treatment options prior to that. We've also secured funding to construct TCP treatment at all of our existing wells plus we plan to update water service rates by this July 1<sup>st</sup> to ensure the operation and maintenance of the treatment systems are properly funded. This funding has assumed and will continue to plan on a MCL of 5 ppt. All current and planned treatment involve the use of granulated activated carbon (GAC) to reduce TCP to 5 ppt or non-detect levels.

The main concern the City has regarding recent action and updates from the State regarding TCP is a possibility that a "series" layout of treatment vessels will eventually be required and the "parallel" layout will no longer be accepted. To date, the current TCP treatment we have in operation at one well and a future treatment system under design for another well both rely on a parallel system. We acknowledge that there are some inefficiencies with parallel systems, particularly the likelihood that not all of GAC will be utilized before the need arises to reload the vessels all at once. During the inception phase of our TCP action plan, we considered the parallel reloading inefficiencies versus the higher capital costs and larger space required for a series system and ultimately decided that a parallel system was in the best economic interests of our customers. If the State chooses to enforce a series layout with new operational permits for TCP treatment, Shafter and other systems will likely be faced with unnecessary costs to comply with

Ms. Jeanine Townsend, State Water Resources Control Board April 20, 2017 Page 2

the standard. It should be noted that many of the affected systems, including Shafter, serve severely disadvantaged communities. We are confident the needs of these particular communities were factored into the decision on what to recommend for a MCL. However, it is still worth noting that the standard and the ongoing funding to enforce the standard affect them. Therefore, the State should allow some operational flexibility on a water system's part to meet the standard through the most economically viable treatment systems possible.

We appreciate the opportunity to address the State's standard for TCP and look forward to working with your staff to ensure that it meets the needs of all Californians.

Sincerely,

Michael James Public Works Director

cc: Marcos Torres, City of Shafter Scott Hurlbert, City of Shafter Tricia Wathen, SWRCB





BYERS / RICHARDSON LAWYERS 843 DEL GANADO RD., SAN RAFAEL, CA 94903-2309

84	3 DEL GANADO RD.,
AN	RAFAEL, CA 94903-2309
	TEL: (415) 492-0535
	FAX: (415) 492-0364

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Daniel M. Denebeim Of Counsel - daniel@denebeimlaw.com

dbyers@landuselaw.net

David J. Byers

Patrick M. K. Richardson prichardson@pmkrlaw.com

February 28, 2017

State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95812-2815

Re: 1, 2, 3 - TCP (trichloropropane)

Dear Members of the Board;

As a private citizen I wish to express my concern regarding 1, 2, 3, TCP. As you know 1, 2, 3, TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Yours Truly,

Patrick M.K. Richardson PMKR:vr cc: Clean Water Action





543 Clayton tul, El Cenito CA 94530





Submitted via electronic mail to commentletters@waterboards.ca.gov

April 21, 2017

The Honorable Felicia Marcus, Chair State Water Resources Control Board 1001 I Street, 24<sup>th</sup> Floor Sacramento, CA 95814

ECEIVE 4-21-17 SWRCB Clerk

American Water Works Association California-Nevada Section

#### RE: 1,2,3-Trichloropropane Maximum Contaminant Level (SBDDW-17-001)

Dear Chair Marcus:

The Association of California Water Agencies ("ACWA") and the California-Nevada Section of the American Water Works Association ("CA-NV AWWA") appreciate the opportunity to provide comments to the State Water Resources Control Board ("Water Board") on the proposed maximum contaminant level ("MCL") for 1,2,3-Trichloropropane ("1,2,3-TCP"). ACWA represents more than 430 public water agencies that collectively supply approximately 90 percent of the water that is delivered for municipal, agricultural and industrial uses statewide. CA-NV AWWA is a professional/trade association comprising nearly 5,000 individual members in California from drinking water providers and companies on which they rely for products and services.

ACWA and CA-NV AWWA, with their respective member agencies and utilities, support the regulation of contaminants that are known health hazards in drinking water, and support the adoption of an MCL for 1,2,3-TCP. However, we request that the Water Board use the criteria provided in the federal Safe Drinking Water Act to include a time period for water suppliers to implement measures to comply with the new MCL without being deemed in violation of the proposed MCL. We also request that the Water Board consider the effects that implementation will have on water systems as this regulation is developed.

#### I. Need for a Compliance Period

a. A compliance period is warranted given the significant impact that the MCL will have on water agencies.

Some water systems will be required to develop new treatment facilities in order to comply with a new 1,2,3-TCP MCL. If adopted on the proposed timeline of July 2017 or

The Hon. Felicia Marcus April 21, 2017

sometime thereafter, the draft regulation would require water systems to begin monitoring for 1,2,3-TCP for purposes of determining compliance starting in January 2018, just a few months after the regulation would become effective. Although compliance based on a running annual average of monitoring results would give some affected water systems a few months before being deemed in violation of the adopted MCL, many other affected water systems would be deemed in violation of the new standard soon after monitoring begins.

It is not feasible for public agencies to install appropriate water treatment systems to comply with the MCL within the time period provided in the draft regulation. The steps to properly install needed treatment include:

- 1. Identifying and evaluating available technologies;
- 2. Pilot testing and designing treatment facilities;
- 3. Securing financing;
- 4. Obtaining environmental review and permit approvals; and
- 5. Building and testing new treatment systems.

All of this can take years and require significant financial outlays. Some water systems have been working to identify and test cost-effective treatment technologies for 1,2,3-TCP, but unless and until the MCL is finalized by the Water Board it is not possible to know how much treatment, if any, will be required for individual systems affected by 1,2,3-TCP to come into compliance. Systems that need treatment to meet the MCL will need time to undertake the significant steps needed to install these facilities.

When a water system is deemed to not be in compliance with a public health-based drinking water standard, in addition to being subject to Water Board enforcement actions, there are, at minimum, three significant adverse impacts:

- The water system is immediately subject to legal liability and lawsuits (lawsuits filed by California River Watch against the cities of Livingston and Vacaville are two examples);
- 2. Water supply reliability can be affected if wells must be shut off; and
- 3. Public confidence in the safety of drinking water may be seriously undermined along with confidence in the water system.

In light of this, ACWA and CA-NV AWWA strongly recommend that the Water Board amend the proposed rule to provide a specific, reasonable time period consistent with the federal Safe Drinking Water Act to enable water systems to comply with the new 1,2,3-TCP MCL without being deemed to be immediately in non-compliance and subject to possible adverse legal action and/or negative publicity, all of which could cause a loss of public confidence in drinking water.

#### The Hon. Felicia Marcus April 21, 2017

#### b. Providing a compliance period is consistent with the federal Safe Drinking Water Act.

The federal Safe Drinking Water Act provides for a phase-in period of up to five years to ensure that water systems have a reasonable amount of time to undertake the work—including the planning, financing, design and construction of capital improvements like treatment facilities—that is necessary to comply with new drinking water standards. Specifically, §1412(b)(10) of the federal Safe Drinking Water Act provides the following authority to regulators:

> A national primary drinking water regulation promulgated under this section (and any amendment thereto) shall take effect on the date that is 3 years after the date on which the regulation is promulgated unless the Administrator determines that an earlier date is practicable, except that the Administrator, or a State (in the case of an individual system), may allow up to 2 additional years to comply with a maximum contaminant level or treatment technique if the Administrator or State (in the case of an individual system) determines that additional time is necessary for capital improvements.

As a result of this statutory authority, federal primary drinking water standards have incorporated Compliance Dates that are separate from the Effective Date, allowing for more effective implementation. These compliance periods are important to avoid situations where water systems are put in a non-compliance situation due to the adoption of a new MCL. We suggest that the Water Board adopt a similar method in establishing compliance and effective dates for the proposed MCL for 1,2,3-TCP.

#### c. The California Legislature has signaled its support for reasonable compliance periods.

In 2015, Governor Brown signed SB 385, which provides a process for public water systems impacted by the state's MCL for hexavalent chromium a period of time to take the steps needed to achieve compliance with that standard. SB 385 did not change the requirement to comply with the standard or delay when compliance is achieved, and affected water systems are successfully taking the same steps toward compliance with the MCL that they would take without SB 385. The bill simply provided a limited period of time for a water system to work toward achieving compliance without being deemed in violation as long as strict safeguards are met. Among these safeguard provisions is a requirement that water customers be informed of the compliance plan and progress toward compliance.

SB 385 signaled the intent of the Legislature that a reasonable compliance period can be an appropriate practice if it is developed along with appropriate safeguards and public notification. Similar to the approach outlined in SB 385, our associations recommend the Water Board provide a reasonable period of time for water suppliers impacted by a new MCL for 1,2,3-TCP to come into compliance before they may be deemed in violation. d. Compliance periods are important to refine and optimize existing water treatment technologies or develop better technologies capable of meeting the new MCL with fewer social, environmental and financial impacts.

Reasonable compliance periods foster the innovation needed to improve water treatment technologies. Compliance periods also help avoid public water system use of valuable resources to pursue available treatment systems only to learn that these systems may be obsolete before they are installed due to technology advancements that typically follow newly adopted MCLs. Because the compliance period is potentially less than twelve months from the effective date of the proposed MCL, the amount of time could compel water systems to skip steps needed to properly identify and evaluate treatment technologies. This can result in water treatment systems that do not work, are too costly to operate, or have unintended consequences that harm consumers.

#### II. Concerns with Implementation

While not proposing any specific changes to the proposed MCL, ACWA and CA-NV AWWA would like to emphasize that there are significant issues and questions related to how the Water Board implements the regulation. Water systems share with the Water Board the desire to have treatment facilities operated in such a manner that there is reliable 100 percent compliance at all times, with adequate safety factors. However, the Water Board must also consider that treatment costs can be greatly impacted by operational practices, in particular with operating granular activated carbon treatment, which is identified in the rule as the best available treatment for this contaminant. Additionally, in its July 2016 public workshop presentations the Water Board recognized system blending as an option for compliance. The requirements that the Water Board would impose as part of implementing this regulation must give full consideration to operational factors such as incorporating "non-detects" in averaging for MCL compliance, turn-around times between sampling and getting certified outside laboratory results, blending objectives, etc. ACWA and CA-NV AWWA, in conjunction with our members, stand ready to work closely with the Water Board's technical staff to discuss and resolve the myriad of issues that arise in real-life operational situations.

#### **III.** Conclusion

ACWA and CA-NV AWWA appreciate the Water Board's consideration of our comments. Should you have any questions, please do not hesitate to contact Rebecca Franklin of ACWA at <u>rebeccaf@acwa.com</u> or (916) 441-4545, or Tim Worley of CA-NV AWWA at <u>tworley@ca-nv-awwa.org</u> or (909) 291-2102.

The Hon. Felicia Marcus April 21, 2017

Sincerely,

m2

Rebecca Franklin Senior Regulatory Advocate Association of California Water Agencies

Timothy Worley <sup>7</sup> Executive Director California-Nevada Section, AWWA

cc: Honorable Members, State Water Resources Control Board Mr. Darrin Polhemus, Deputy Director, Division of Drinking Water, State Water Resources Control Board



From: To: Subject: Date: <u>ritaminjares@comcast.net</u> <u>commentletters</u> Don't Let Dow and Shell Get Away With Poisoning California Drinking Water Wednesday, March 22, 2017 4:11:29 PM



К

Help us protect Californians in low-income rural regions from 1,2,3 TCP and ensure that the cost of water treatment is borne by those who enabled this dangerous carcinogen to enter drinking water supplies.

Tell the State Water Board to establish a legally enforceable drinking water standard of 5 parts per trillion, which is the chemical's detection level in water.

Doing so will save countless lives and hold Dow Chemical and Shell Oil accountable for the harm they've caused. Please take action today so that the Board will do so tomorrow!

Rita Minjares 7316 Rockway Ave El Cerrito CA 94530



B





Dear Jeanine Flow sendors in O 10 ACTION I'm part of the #WomensMarch movement. I'm from SAN WIS DBISPERSE and I'm concerned about Contaminution of our water supply by 1,2,3-TCP. Here's why: Clark to the Board 1,2,3-TRICHLOROPROPANE IS A KNOWN CARCINGEN; I URLE YOU Jeanine Toursence M5. TO ALLEPT THE PROPOSED 5 PART PER TALLION MAX CONTAMINANT State Water Resources Lo LEVEL WITH THE EXPEDIENCY. P.O. Box 997377 Bord In the first 100 days of the new administration, I hope that you understand and take these concerns seriously. MS 7400 Sacramento CA Sincerely, 95899-P57-Pyan huchen 









ECEIVE

4-19-17

SWRCB Clerk

В

Р

alMutuals

April 7, 2017

State Water Resources Control Board Felicia Marcus, Chair P.O. Box 100 Sacramento, CA 95812-0100

Re: 1,2,3-Trichloropropane Maximum Contaminant Level Standard

Dear Chairwoman Marcus and Board:

As practitioners that provide technical assistance to rural drinking water systems in the San Joaquin Valley and throughout the state, Rural Community Assistance Corporation (RCAC) and Self-Help Enterprises (SHE) support adoption of the State Water Resources Control Board's proposed 5 part per trillion maximum contaminant level (MCL) for 1,2,3-trichloropropane (123 TCP). We support the proposed standard because it will protect the residents' health in the communities we serve, but we are concerned that compliance costs will impact drinking water affordability for consumers served by small water systems. We therefore urge the Board to provide additional assistance to rural, low-income communities to help them comply with the standard.

The communities we serve are disproportionally impacted by the prevalence of 123 TCP in their water supplies, and they often lack adequate resources to comply with existing drinking water standards. Small water systems lack economies of scale that help spread compliance costs among a large ratepayer base and therefore charge some of the highest water rates in the state. They are often unable to find or afford water operators who are certified at the grade necessary to oversee proper treatment and distribution that is needed to provide safe water.

While the adoption of the proposed 123 TCP standard will protect public health, it will also impose additional costs on small water systems. Even if many systems can obtain some relief through the courts, there will be significant capital outlays to build treatment facilities to remove 123 TCP, and ongoing operations and maintenance costs in perpetuity. To help offset the costs and to protect public health to the maximum extent possible, the SWRCB should dedicate additional technical assistance, training and grant funding to communities impacted by the regulation. The resources should be deployed to build the capacity of communities and small utilities to help them comply while keeping rates affordable.

Access to affordable, safe water is essential to build community, improve local economies, create jobs and reduce poverty. The proposed MCL for 123 TCP, when coupled with additional resources to help disadvantaged communities comply, will protect public health while keeping rates affordable.

Felicia Marcus, Chair State Water Resources Control Board April 7, 2017 Page 2

Thank you for the opportunity to provide these comments and for your consideration. If you have any questions, please feel free to contact Ari Neumann, Assistant Director, Community & Environmental Services, aneumann@rcac.org, or (916) 588-0112.

Sincerely,

Stanley Keasling

Tom Collishaw President/CEO, Self Help Enterprises CEO, Rural Community Assistance Corporation



ECEIVE 4-18-17 SWRCB Clerk

April 18, 2017

State Water Resources Control Board c/o Ms. Jeanine Townsend Clerk of the Board P.O. Box 997377, MS 7400 Sacramento, CA 95899-7377

#### Re: SBDDW-17-001; Proposed 1,2,3-Trichloropropane MCL Regulation;

Dear Members of the State Water Resources Control Board::

The undersigned cities, special districts and mutual water companies, all of whom own and operate Public Water Systems regulated under California's Safe Drinking Water Act, and all of whom have one or more groundwater wells affected by 1,2,3-trichloropropane (1,2,3-TCP) contamination, hereby submit this comment letter <u>in support of</u> the State Water Resources Control Board's proposed Maximum Contaminant Level (MCL) for 1,2,3-TCP.

#### 1,2,3-TCP in Drinking Water Increases Cancer Risk

According to the Board's own website, "1,2,3-TCP causes cancer in laboratory animals (US EPA, 2009). It is reasonably anticipated to be a human carcinogen (NTP, 2011), and probably carcinogenic to humans, based on sufficient evidence of carcinogenicity in experimental animals (IARC, 1995)."<sup>1</sup> The California Office of Environmental Health Hazard Assessment ("OEHHA") has concluded that "1.2.3-TCP represents a significant carcinogenic risk when it occurs in drinking water."<sup>2</sup> Based on that conclusion, OEHHA issued in 2009 a final, peer-reviewed Public Health Goal (PHG) for 1,2,3-TCP in drinking water of 0.7 ppt - the second-lowest health-based level ever set for a drinking water contaminant in California.

## Soil Fumigants Manufactured By Shell Oil and Dow Chemical Account for Most of the 1,2,3-TCP in California Groundwater

1,2,3-TCP does not occur naturally. Although small quantities of 1,2,3-TCP have reportedly been used for industrial purposes in certain locations, most of the 1,2,3-TCP in California's groundwater comes from past use of soil fumigants on farm fields. Specifically, 1,2,3-TCP was an unnecessary impurity in fumigants manufactured by Shell Oil Company and The Dow Chemical Company that were used extensively in California in the production of multiple crops from the 1950s through the 1980s. In fact, 1,2,3-TCP-containing fumigants were among the most widely used pesticides in the history of the State. Unfortunately, while the active ingredient in Shell's and Dow's fumigants (known as 1,3-dichloropropene) quickly

<sup>1</sup> http://www.waterboards.ca.gov/drinking\_water/certlic/drinkingwater/123TCP.shtml

<sup>&</sup>lt;sup>2</sup> OEHHA, 2009 (http://www.oehha.ca.gov/water/phg/pdf/082009TCP phg.pdf) (emphasis added).

State Water Resources Control Board Page 2

breaks down after injection into the soil, 1,2,3-TCP, which the companies never disclosed as an ingredient on their products' labels but internally referred to as a "garbage" ingredient because it provided no benefit to farmers, persists in soil and groundwater for decades. Not surprisingly, most of the drinking water sources in California with repeat detections of 1,2,3-TCP are located in the San Joaquin Valley, the agricultural epicenter of the State.

#### Clean Water v. Affordable Water: We Have a Right to Both

When it comes to 1,2,3-TCP contamination, the undersigned water systems share the same two goals. First, we want 1,2,3-TCP removed from our groundwater supplies, and public exposure to 1,2,3-TCP in our communities eliminated. Second, we want the parties responsible for causing the 1,2,3-TCP contamination, rather than our water customers, to cover the costs of treatment. That is why we and dozens of similarly situated Central Valley water systems have turned to the courts seeking compensation from Shell and Dow to pay for, among other things, the installation, operation and maintenance of 1,2,3-TCP treatment facilities.

Shell and Dow argue, however, that an MCL is a "bright line" that should define when a contaminant damages a water supply, and that "the absence of an MCL [for 1,2,3-TCP] is the single greatest uncertainty-generating factor" impeding resolution of these lawsuits. Consequently, it is our hope that adoption of the proposed MCL at 5 ppt – a level that is the equivalent of the Detection Limit for Reporting Purposes (DLR) and is thus the level that is as close as technically feasible to the PHG – will promote swift resolution of the 1,2,3-TCP cost-recovery lawsuits and strengthen our ability to hold the responsible parties accountable for the costs of 1,2,3-TCP remediation, which, in turn, will help us to achieve our shared goal of installing 1,2,3-TCP treatment with minimal impact on our ratepayers. In contrast, setting the MCL higher than the DLR on account of the substantial costs of treatment will only further enrich the responsible parties at the expense of public health.

MCLs typically require a difficult choice between public health and affordability. But in the case of 1,2,3-TCP, the choice in favor of public health should be an easy one to make. That is because 1,2,3-TCP differs from most other contaminants of regulatory interest in a number of important respects, including: 1,2,3-TCP is an unusually potent carcinogen and there does not appear to be any genuine debate in regulatory and public health circles regarding its health risks; the contaminant is exclusively man-made; viable responsible parties have been identified in most instances of 1,2,3-TCP contamination; and most affected water suppliers have available legal remedies to shift treatment costs from their ratepayers to those responsible parties. We, therefore, urge the Water Board to adopt the proposed 1,2,3-TCP MCL at 5 ppt, and to do so as soon as possible.

Please direct any correspondence related to this comment letter to our outside counsel at the following address:

Robins Borghei LLP 649 Mission Street, Suite 500 San Francisco, CA 94105 State Water Resources Control Board Page 3

Thank you.

Respectfully,

Arvin Community Services District City of Kingsburg City of Parlier City of Reedley Delhi County Water District Del Rey Community Services District Le Grand Community Services District Orosi Public Utility District Vaughn Water Company Woodville Public Utility District

3\$ Deadline: 2 ECEIVE February 27,2016 4-19-17 SWRCB Clerk Dear Members of the Board; From the information that has been provided, 1,2,3 TCP has contamited a vast number of clrinking water Sources. Many communities have been affected by the contamination of the chemical and we wish to ask you to set the TLP drinking water standard to 5 ppt, for the deflection limit. This is to protect the health of the public. Sincerery 519 B street, AptS.



State Water Resources Control Board 1001 I Street Sacramento, CA

Feb. 28, 2017

Dear Members of the Board,

I am writing to request that you set the TCP drinking water standard at 5 ppt to protect public health. The quality of California's drinking water should not be left in the hands of for-profit corporations, who have for decades shown a wanton disregard for the health of citizens and have instead focused solely on profits for themselves and their shareholders.

Sincerely,

Wendy Mm.

Wendy Meunier Marin County Resident



# 2-6-17 Dear Members of the boy diplease ceep our Water cleen. I am nine and then K all children Usurve. Freusch Water B Please set the TCP drinking Water at standerd a SPPT To Protect all people

Sencerly Jorde Teresita Blud. 5F (A 94127

State Water Resources Board 1001 1 Street

Sacramento, CA 95812-2815

December 29, 2016

Dear Members of Borrd,

12,3 TCP is a man-made Carcinogen that Containstates 372 Known California drinking water Sources, largely in low income sural communities where familing fallity pesticides were Sold.

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Please set the TCP chrinking water standard at 5 ppt (the detection limit) to protect public health and allow systems to recomp water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Parrele Suess 6627 Manila Ave. El Cervito, CA 94530

B

State Water Resources Control Board

1001 | Street

Sacramento, CA 95812

January 24, 2017

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

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Sincerely,

Allyson Hance

4371 Townsend Ave.

Oakland, CA 94602

2.3- TCP Deadline: 4/21/17 at 5pm

ice ve

3-9-17 SWRCB Clerk

 From:
 n. Ceorl

 To:
 commentletters

 Subject:
 SBDDW-17-001

 Date:
 Thursday, March 9, 2017 2:56:15 PM

March 9, 2017

Felicia Marcus, Chair

Frances Spivy-Weber, Vice Chair

Tam M. Doduc, Member

Steven Moore, Member

Dorene D'Adamo, Member

State Water Resources Control Board

P.O. Box 100

Sacramento, CA 95812-0100

Re: 1,2,3-Trichloropropane MCL

Dear Board Members Marcus, Spivy-Weber, Doduc, Moore, and D'Adamo:

The undersigned organizations, on behalf of the hundreds of thousands of Californians they represent, urge the State Water Resources Control Board to adopt the Division of Drinking Water's proposed **5 part per trillion** (ppt) maximum contaminant level ("MCL") for 1,2,3-trichloropropane ("TCP") with all expediency. TCP is a solely man-made chemical that puts the health of Californians in at least 16 counties served by almost 100 water systems at risk.[1]

#### 1,2,3-TCP is a known human carcinogen

Since 1992, California has recognized TCP as a chemical "known to the State to cause cancer" under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65, 1992).[2] Concluding that "1,2,3-TCP represents a significant carcinogenic risk when it occurs in drinking water," the California Office of Environmental Health Hazard Assessment ("OEHHA") issued a Public Health Goal (PHG) for TCP in drinking water of 0.7 ppt in 2009.[3] According to the State Water Board's Standardized Regulatory Impact Assessment, "[e]xposure to concentrations of 1,2,3-TCP in drinking water that exceed the PHG will result in an increased risk for cancer.<sup>[4]</sup> Because the lifetime cancer risk increases as a direct result of increasing the allowable concentration of TCP in water, the State Water Board should adopt an MCL no greater than 5 ppt, which is the detection limit for reporting purposes ("DLR").

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#### Disproportionate impacts in agricultural regions

Although small quantities of TCP have reportedly been used for industrial purposes, most of the TCP in California's groundwater is the result of its presence as an unnecessary impurity in soil fumigants manufactured by Shell Oil Company and Dow Chemical Company that were used extensively in California from the 1950s through the 1980s. Shell and Dow failed to disclose to farmers that TCP was a contaminant in their products or the harm it posed to human health.

TCP has been detected all over California, but more than half of the state's contaminated wells are found in the agriculturally rich San Joaquin Valley, particularly in Kern, Fresno, and Tulare Counties.[5] People in these rural, lower-income regions are already threatened by disproportionate exposure to contaminated water and other pollution, often lack the adequate resources to address these problems or the associated medical consequences.

Costs to water systems and the public should NOT change the 5 ppt recommendation

Health & Safety Code §116365(a) requires the State Water Board to establish a contaminant MCL as close to its PHG as is technologically and economically feasible, placing primary emphasis on the protection of public health. Given TCP's DLR, it is not technically feasible to set the MCL lower than 5 ppt. The only other factor the Board is permitted to consider is cost.

Because TCP is man-made, viable responsible parties have been identified, and affected water suppliers have available legal remedies to recoup water treatment costs, choosing to allow greater cancer risk because of the economic factors benefits no one but the responsible parties. In fact, setting the MCL at 5 ppt would expedite cost-recovery efforts that have been pending for years, while providing strong health protection and limiting medical costs.

#### Adopt a health-protective MCL as soon as possible

The SWRCB's Standardized Regulatory Impact Assessment said, "Based on the inability to obtain alternative sources of drinking water, disadvantaged communities would continue to use and consume drinking water containing high levels of 1,2,3-TCP. In disadvantaged or severely disadvantaged communities, the incidence of cancer cases over a lifetime would be greater as compared to other impacted communities. Therefore, the proposed regulation would offer the most health benefit to these types of communities." Given that the state has recognized the dangers of TCP since 1992, it is critical to expedite treatment and mitigate further exposure to unsafe levels. Consequently, the adoption of a 5 ppt MCL should not be delayed any further.

Thank you for your consideration.

Sincerely,

Ceorl

[1] http://www.waterboards.ca.gov/drinking\_water/certlic/drinkingwater/123TCP.shtml.

[2] https://oehha.ca.gov/media/downloads/proposition-65//p65single01272017.pdf, pg. 21.

[3] https://oehha.ca.gov/water/public-health-goal/final-public-health-goal-123trichloropropane-drinking-water

[4] http://www.dof.ca.gov/Forecasting/Economics/Major\_Regulations/Major\_Regulations\_Table/documents/

Final\_SRIA\_10062016.pdf

[5] The exception to this is Los Angeles County, which is the second most effected in the state.

47

Public Comment 1.2.3- TCP Deadline: 4/21/17 by 12 noon

From: To: Subject: Date: Solin Ch commentietters 1,2,3-Trichloropropane MCL Thursday, April 13, 2017 9:31:00 AM

4-13-17 SWRCB C'erk

В

Felicia Marcus, Chair

Tam M. Doduc, Member

Steven Moore, Member

Dorene D'Adamo, Member

State Water Resources Control Board

P.O. Box 100

Sacramento, CA 95812-0100

Dear Board Members Marcus, Doduc, Moore, and D'Adamo:

The undersigned organizations, on behalf of the hundreds of thousands of Californians they represent, urge the State Water Resources Control Board to adopt the Division of Drinking Water's proposed **5 part per trillion** (ppt) maximum contaminant level ("MCL") for 1,2,3-trichloropropane ("TCP") with all expediency. TCP is a solely man-made chemical that puts the health of Californians in at least 16 counties served by almost 100 water systems at risk.

1,2,3-TCP is a known human carcinogen

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#### Disproportionate impacts in agricultural regions

Although small quantities of TCP have reportedly been used for industrial purposes, most of the TCP pollution of California's groundwater is the result of its presence as an unnecessary impurity in soil fumigants manufactured by Shell Oil Company and Dow Chemical Company. These fumigants were used extensively in California from the 1950s through the 1980s. Shell and Dow neglected to disclose to farmers that TCP was a contaminant in their products or the harm it posed to human health.

TCP has been detected all over California, but more than half of the state's contaminated wells are found in the agriculturally rich San Joaquin Valley, particularly in Kern, Fresno, and Tulare Counties. TCP is not the only pollutant affecting water supplies in these rural, lowerincome regions where residents are already threatened by disproportionate exposure to contaminated water and other pollution, and often lack the adequate resources to address these problems or the associated medical consequences.

#### Costs to water systems and the public should NOT change the 5 ppt recommendation

Health & Safety Code §116365(a) requires the State Water Board to establish a contaminant MCL as close to its PHG as is technologically and economically feasible, placing primary emphasis on the protection of public health. Given TCP's DLR, it is not technically feasible to set the MCL lower than 5 ppt. The only other factor the Board is permitted to consider is cost.

Because TCP is synthetic, manufactured chemical that does not occur naturally, viable responsible parties have been identified, and affected water suppliers have available legal remedies to recoup water treatment costs, choosing to allow greater cancer risk because of the economic factors benefits only the responsible parties. In fact, setting the MCL at 5 ppt would expedite cost-recovery efforts that have been pending for years, while providing strong health protection and limiting medical costs.

Adopt a health-protective MCL as soon as possible

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Thank you for your consideration.

Sincerely,

Sojin Oh 213 926 8435

Public Comment 1,2,3- TCP Deadline: 4/21/17 at 5pm

### BYERS / RICHARDSON

LAWYERS 843 DEL GANADO RD., SAN RAFAEL, CA 94903-2309 TEL: (415) 492-0535 FAX: (415) 492-0364

February 28, 2017

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David J. Byers dbyers@landuselaw.net

Patrick M. K. Richardson prichardson@pmkrlaw.com Daniel M. Denebeim Of Coursel - daniel@denebeimlaw.com

State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95812-2815

Re: 1, 2, 3 - TCP (trichloropropane)

Dear Members of the Board;

As a private citizen I wish to express my concern regarding 1, 2, 3, TCP. As you know 1, 2, 3, TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Yours Truly,

Patrick M.K. Richardson PMKR:vr cc: Clean Water Action

> SONOMA OFFICE 260 WEST MACARTHUR ST., SONOMA, CA 95476-7426 TEL.: (650) 759-3375; FAX: (707) 721-1469

PALO ALTO OFFICE 825 SAN ANTONIO RD. #109, PALO ALTO, CA 94303-4620 TEL: (650) 336-7614; FAX: (650) 584-3223 BYERS / RICHARDSON LAWYERS 843 DEL GANADO RD., SAN RAFAEL, CA 94903-2309 TEL: (415) 492-0535 FAX: (415) 492-0364

David J. Byers dbyers@landuselaw.net

Patrick M. K. Richardson prichardson@pmkrlaw.com Daniel M. Denebeim Of Counsel - daniel@denebeimiaw.com

February 28, 2017

State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95812-2815

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PALO ALTO OFFICE 825 SAN ANTONIO RD. #109, PALO ALTO, CA 94303-4620 TEL: (650) 336-7614; FAX: (650) 584-3223


January 27 2014 Dean Members of the board: 1,2,3TCP is a man-made cancinogen that contaminate 3722 Known California drinking water sources, largely are aulty perficides in low income nual communities where faulty perficides Please Bet the TCP drinking water Standard at 5 ppt Please Bet the TCP drinking water Standard at 5 ppt (the detection limit) to protect public health and allow B (the detection limit) to recoup water treatment costs from the water systems to recoup water treatment costs from the companies that Gold the contaminated pesticides.

Sincerely, Leila Khan, Age 12 368 Bryant Ave Alameda 94501

## 01/27/1971

dear members of the board,

we don't want man made carcinogens in drinking water. largely low income rural communities suffer from these bad water sources.

please set the tcp drinking water at 5ppt to protect public health and recoup water treatment costs from the companies that sold contaminated pesticides.

thank you -

e. bloom 2234 roosevelt, Berkeley 94703 В

TheBerkeleyMBA , 25. 19

1.2.3 TCP is a man-made Carcinogen that contaminates 372 Known California drinking water sobres, largely in low Excome, wral commuritties, where famety pesticides were sold. Please sol the TCP drinking water standard at 5 ppt (the detection limit) to protect public Realth and allow water Systems to recoup water treatment costs from the firms that sold the contaminated pesticides Sincerety, Smit Stad Collins, 1354/A Lincoh Chetkovich Career Center + Haas School of Business + University of California Berke http://www.haas.berkeley.edu/careercenter + (510) 643-0344

В

1/25/2017 State Water Resources Control Board Dear Members of the Board 1,2,3 TCP is a man-made carcinogen that contaminates 372 longer water sources, langely in low-income rural. communities where Canty pesticides ware sold. Allowing this danger to Californians il Brance to continue is macago falles Please set the TCP drinlody water standard to Spot to protect public healthyand ablow. water systems to recomp water treatment costs from the companies that sold the dontiminated posticides. Thank you. Sincerely, Shanna Haines Shawa Khin

4/12/17

Dear Member of the Board

1,2,3 TCP is a human-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides are sold.

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Please set theTCP drinking water standard at 5ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Tim Can So n 2331 Coronet Blvd Belmont, CA 94002

2/28/17 ·rr'-Dear members of the Board, <( ¥ - 44 (J) 1,2,3 TCP is a man-made carcinogen that contaminates 372 Known California drinking water sources, largely in 10w Mome rural communities where faulty performed pesticides ul 🔬 here sold, ഹ്.. Z - K Please set the TCP drinking water Standard at 5 ppt (the defection (imit) to protect public health and allow water S ₩ N 41 - 12 systems to recomp water treatment costs from the ٠K Companies that sold the contaminated pesticides, Sincerely, Alison Bayley Alison Bayley 14 Endeavor Drive .œ X-X L-X Ω.¥ Ω 11 :24 Cone Madera, CA-94925 > -x STAR. 11 4  $\geq \mathbf{k}$ LI.

February 7, 2017

State Water Resources Outrol Board: 1001 I Street Socramento, CA 95812-2815

Dear Members of the Board:

1,2,3 TCP is a man-made carconogen that containmates 372 known California drinking water sources, largely in 100 means number ound on where failing pesticides were sold. 52

В

Please set the TCP directing uster standard at 5 ppt (the detectron limit) to protect public health and allow water systems to recoup water-treatment costs from the companies that sold the contaminated pesticides.

Californous ned and deserve cleandrinking water they controst!

Sincerely June 37734 Second Street Fremouh Ct 94536

Date: December 27, 2016

To: State Water Resources Control Board

Dear Members of the Board

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP in drinking water to be at or below 5 ppt (detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

В

Sincerely

Kwok Siong Teh Plong Siew Poh Tong 1326 Norvell Street, El Cerrito, CA 94530

## 2017-02-01

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold. Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Sincerely, Dave Girard 476 59th St. Oakland, CA 94609

55 1. February 2017 Dear Members of The State Water Resarces Control Board; 1,2,3 TCP is a man-made curcinogen That contaminates 372 known California drinking water sources, largely in lowincome fund areas/communities where fundty pesticides were sold. Please Set the TCP dronking winter standard @ 5ppt (The detection, limit) to protect public health and allow water Systems to recoup water preatment costs from The companies The continuited posticites that sold DIKEP Blaketoch instr St Dallast

Lec 27, 2016 Den memberi site Bound 1, 2, 3. 7 CP is a man-madel carcenogen that contaminates 372 Known California drenkeng water prover, lugely in low rural commenties where Janety Please set the Jep drenking water Please st the delection limit plandard at sppt (the delection allow to protect water record water to protect from the confirmer B water water intermed performed beater... preserver the interneted perticuter. Sincerely , Daily Layima

State Water Resources Control Board 1001 I St Sacramento, CA 95812-2815

Dec 27<sup>th</sup>, 2016

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

57

Β

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Hetal Jariwala 1236 Cabrillo St El Cerrito, CA 94530

1/31/17 Dear Members of the Board 1,2,3 TCP 13 a main Maide carcinogen that contaminates 372 known California Prinking Water Sources larghey in low income rural communities where faulty pesticides were Gold. Please set the TCP Uninking water Standard a Sppt (Refection limit) to protect public health and allow water systems to recoup Water treatment costs from the companies that sold the contaminated pesticides. . Thank's Alex Little all 267 Duncari St.

59 1/31/2017-Dear Members of the Board 17,3 TCP is a Man-made carcinogen that contaminates 37.2 Known Colfanne drikking water sources, langely in low income rupal commentation When faillty perticides wer sold. Please set the TCP drinking water standard at Spot (the detection limit) to protect Public health & allow water systems to recorp hater freatment cast from the companies that fold the Contaminated pesticides. Since My Sonia Zaldana 458 Templeto N Are 458 Templeto N Are 4014

1/4/17

Dear member of the board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Thomas Yip 906 Everett St. El Cerrito CA 94530 1/4/2017

Tim Kieschnick 924 Everett St. El Cerrito, CA

State Water control Board 1001 | Street Sacramento, CA 95812

Dear Board Members:

I am concerned about drinking water quality throughout California. In particular, I believe we should protect ourselves from 1,2,3 TCP, a manufactured carcinogen that contaminates many drinking water sources, including many low income rural communities in California.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Tim Kieschnick

В

Feb 15, 2017 Dear members of the board: 1,2,3, TCP 15 a man-made carcinogen That contaminates 372 known California low income Rural communities where faulty pesticides were sold Please Set the TOP drinking Water Standard @ at Sppt (the detection ling) to protect public health and allow water SLAStems to recoup water treatment costs contaminated pesticides. Sincerely Kelsey langedare Sale I Ris St Realwood City, CA 94062

## FC615,2017

Dear Members of the Board:

123 TCP is a man-made carcinogen that contaminates 372 known California duinking water sources, largely in low moome nural communities where fairly pesticides were sold.

Please set the TCP drinking water standars at 5ppt (the detection timit) to B protect public health & allow water systems to recorp water treatment Costs from the companies that sold contaminated perticides.

sincerely,

Mithadron

Benedicte Richardson 472 Avdson st Redwood city, CA 94062

muny 23, 2017 Dear members of the hates Resources Control Boord, 1,23 TCP is a carcinagen that continuates 372 Known CA drunking water sources, lagely in low income rural communities where funct, pesticides mere sold. Please set the TCP drucking notes standard at 5 ppt ( the defection limit) to protect public health & allow water systems to he congo notes he atment Costs for the В Companies that sold contaminated pesticides. That you for your help. Sincenty your,

Alisin Orda 1827 Blache St Berkely CA 94-703

65 1/23/17 Dear Members of the Board 1.2.3 TCP 13 a man-made carcinogen contaminates 37 known California drinking water nome ratal communities where fa s largely in pesticides w Sources low locome raral Faulty Please set the TCP drinking water standard at 5 ppt (the detection limite) to protect public health callow water systemsB to recoup water treatment costs from the companies that sold the contaminated pesticides. TCP Sincekely Tillanj Bay 1904 Parker Street Berkeley CA 94704

Gordon D. Cremer

2063 Oregon Ave, Redwood City, CA 94061-2507

State Water Resources Control Board 1001 | Street Sacramento, CA 95812

February 15, 2017

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources – largely in low-income, rural communities where faulty pesticides have been used.

I encourage you to please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

К

Sincerely,

& Cuburty

Gordon D. Cremer 2063 Oregon Ave Redwood City, CA 94061-2507

Feb 15, 2017 Dear Members of the Board, 1,2,3 TCP is a man-made carcinoger that contaminates 372, known Calidrinking water sources, largely in low income rural communities where faulty pesticides were sold. lease set the TCP applino wa standard at 5 ppt (the detection limit) to protect public hearth and allow Water systems to recoup water treatmer costs from the companies that sold he containipated 1 Desticio reveli ichelió SO, King St. Reducted City, CA

STATE WATER RESOURCES CONTROL BOARD 1000 I STREET SACRAMENTO, CA 95812-2815

JANUARY 5, 2017

Dear Members of the Board:

In learning the background of the man-made carcinogen 1,2,3 TCP and its negative impact on 372 known California drinking water sources, largely in low income much communities where faulty pesticides were Sold, I am called to seek your help. Please set the TCP drinking water it init) to protect public health and B allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Erik Dunkip Sib Albemarle St El Cerrito CA 94630

Qate: Feb 6, 2017 Dear Members of the Board 123 TCP 15 a manmade Carcinogenthat is contaminating California drinking Water / Plase set the TCP drinking Water Standard at 5 ppt to protect public health and allow Water B Systems to recoup water treatment costs from The companies that sold the contamenated policides Sinceraly Jane Mustin 962 Teasita Blod SECA 94127

January 27 2/017 Rear members of The Board, 1,2,3,TCP is a man made cat congen that contaminates 372 KNown califonia drinkling water sources, largely in low income moral communities Where faulty pertudes were gold - This is unacceptible in This day and age. Please set the TCP Ironbing water standard at 5 pps the setection limits to protect B pablic health and allow water systems To recoup water treatment costs from The companies That sold the contaminated Restrictes. Sincerly

Ahna Conchinan

2127 A Roboevelt tre Barkely a 91703

January 27, 2017 Dear Members of the Board,

A man-made carcinogen called 1, 2,3 TCP Contaminates 372 Known California drinking water Sources, largely in low income rural communities where Faulty pesticides were sold.

Please set the TCP drinking water standard at 5ppt B (the detection (init) to protect public health and allow Water systems to recoup water treatment costs From the companies that sold the contaminated pesticides.

Sincerchy,

Chris Heine 2231 McKinley Ave Barkeley, CA 94703

1/25/17

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California divinking water sources, lavely in low income rural ( communities where that y pesticides were sold Please set the TCP divinking water standard at 5ppt to protect public health & allow water systems to B tecoup water treatment costs from the companies that sold the contaminated pesticides

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Sincerety, Raina Pihkosn 1775 Franklist Berkeley CA 94708

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January 25, 2017

State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

Subject: Drinking Water Standard for 1,2,3-TCP

Dear members of the Board,

1,2,3-trichloropropane (TCP) is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low-income rural communities where faulty pesticides were sold and used.

Please set the drinking water standard for 1,2,3-TCP at five parts-per-trillion (5 ppt; the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

В

Sincerely,

Taylor Bermett

Taylor Bennett, PG, CHG 1278 Delaware St. Berkeley, CA 94702

Feb 3, 2017 Dear Member of the Board: 1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low-income rural communities where faulty pesticides were sold. Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recomp water treatment costs from the companies that sold the contaminated particides. sincerely aimee drieta 4803 manila Ave addand cA 94609

75 Feb2,6 Par Member of the Boar MON-MEDIE CACIOEN Contarinates KAN 12 Californian drinking uater SOLV(S The low-mane rural community argely Mae foully pesticide use solo Starinking water Stardar (the detection limit) heatth 3 2100 **Mater** PCAD  $\mathcal{O}$ KIGMS 3 compantes the contaminate A -20d 1101-PHV brick t n p

Jan 27, 2017

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the contaminated that sold the contaminated pesticides.

B

Sincerely,

Nancy Kalter-Dills, Architect 2135 Curtis St. Berkeley CA 94702

271 Dear Members of the Board, 1, 2, 3 TCP to a man-made carcinogen that contaminates 372 Known CA Water sources, largely in low-income communities where faulty pesticides nira arld Please get the TCP drinking water standard at 5 ppt (the detection limit 2 detection limit & to protect and allow water system water treatment costs trona companies that gold the contaninated serticidos Sincereley, Ryra Gordon 5

1/1/17 10: State Water Resarres Control Board 1001] Street Sacramento, CA 95812-2815 Dear Members of the Board, 1,2,3 TCP is a dangenous man-made carcinogen that Can contaminate 372 Known California dinking Water Bources, largely low mone mul communities where faulty pesticides were sold. We are asking to set the TCP dianking water Standard at 5 ppt (the detection limit) to protect public health and allow water systems to recorp B water treatment costs from the companies that sold the contaminated pesticides. We are relying on you to help is protted California families from corporate polluters. We appreciate your service Thank you, JAPED BRICK 815 Richmond St. El Cemito CA 94530 ecowarnor 2012 agmail.com

## 1/4/17

Dear member of the board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B



Becky Yip 906 Everett St. El Cerrito CA 94530

State water Resources Control Board 1001 1 Street Sacramento, CA 95812-2815

2-1-17

Dear members of the Board.

1.2,3 TCP is a man-made caveinagen that contain snakes California drinking wader.

Please set the TCP drinking water standard dt 5 B ppt (the defection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Deb Porter 599 63rd 57 Dakland, CA 94609

February 1st, 2017 Dear Members of the Board 1, 2,3 TCP is a man-made carcinogen that contancinater 372 known California drinking water sources, largely in bw-income rural communities where faulty perticides were sold. Thease set the TCP drinking water standard at 5 PPT (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companyer that hold the contaminated perticides. Sincerely, M. Megan Standisch 5937 Waccall Street 1 Oakland CA 94609 . . . . . . . . . . . . . . . . . 0 221 IS 608.90 where the second state of the second state of the second state  $\tau_{\rm eff}$ х н н н н х <u>х</u> 22 A second is a second of the second se second se ਦ 10 ਕ ਮਦ ਕਸਕ ਸ ਕ ਕਰਨੀ 100 ਹ ਹ - a a terres de la companya de la comp . V., J.
State Water Desaurces Control Board 1001 151. Sacramento, (A 95812-2815 2-8-17 Den Board Menher Please set the 1,2,3 TKP drinking water standard B at 5ppt. we need to protect the public from all contaminants in the water supply. That you, Russell Sayten 1509 Milviast. Serkelen CA 74709

2/8/2017 8 the State water resources Decen Members Control Board: 1,2,37CP is a man-made Concernagery that containated 372 known California down Eing water Euras, Largely in Courinceme veral communities where bailing Restacides were Sol-1. Please set the TCP durnling halon Stondard at 5ppt (the detection comit) to protect peblic health and allow B vatur systems to recorp water treatment costs from the Companies that sold the contammated perficides. W Think you.

Moure Stehn 1875 Viño St. Berhely CA 84703

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Dear Members of the Board,

1, 2, 3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Emilia Kaldis 43 Captains Drive, Alameda CA

"Emilia Dullis

B

1/12/2017

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 know California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Water is our most precious resource — we cannot go on contaminating it like this, so please protect Californians from big business who are only out to make a profit at the expense of Californians.

Sincerely,

Jon Seidel

Carol Haskell

3373 Guido Street Oakland, CA 94602

Dec. 2/ # 2016 Dear Hembers of the Board, 1,2,3 TCP is a man-made carcingen that antaminates 372 known California derinking water sources, largely in low income rural communities where faulty pesticides were sold. Please set the TCP drinking water standard at 5 ppt (the defection limit) to protect public health and allow water systems В to recoup water treatment costs from the companies that sold contaminated peopledes. Sincerely Anna Marianella 436 April 38th st. Oakland CA 94609

86

12/21/2016

Dear Members of the Board,

that contaminates 372 known California drinking water sources, langely in low income rural communities where faulty pesticides were sold.

Please set the TGP drinking water Itandard at 5ppt (the detection limit) to B protect public health + allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

> Sincerely, Elizabeth Allen 1548 5th St. Alameda, CA. 94501

12/21/16 Den Membrers of the Box.d: 1,2,3 TCP il a man-mode carcinogen that Contaminates 372 Known California drinking water Unices, largely low income rural Communities where faulty perticides were sole. Please But the TCP drinking water Ofanderd at 5 ppt (the detection limit) to protect B Public health and allow water Oystems to recomp water treatment costs from the Ormpanies that Oold the Contaminated Perficider . Pincerely; Stephanic Kodriguez Mart 3232 Encinal Que. Alameda Can 94501

89 12/20/16 Dear Members of the Board. 1,2,3, TCP is a man-made carcentique that contanientes 372 known California drinking waler sources, largely in Iseincome trural communities where faulty pesticides were sold. Elease set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow systems to record water treatment B Costs from the componies that sold the contaminated pesticides. Sucerday, Caroly Helper 3274 Enciral Que. alameda, CA 94501

12/27/16. Dear Members of the Board: 1.2,3 TOP is a man-made currinogen that contaminates 372 Whown (altornia drinking water sources, largely in low income rural communities where fully posticides were sold. Please set the TOP drinking water standard at 550 ppt (the distoction B contained) to protect public health and allow water systems to recoup water streatment costs from the companies that sold the contaminated pesticides.

Sincerely. Anthony Lin BRAN 1314 Noble ct. (4 94530

# 12/27/16.

Dear Members of the Board:

1,2; 3 TCP is a man-made carcinogen that contaminates 372 Known California dirinking water sources, largely in low income rural communities where tauty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow writer systems to recoup B water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Cathy Pan. 1314 Noble Gt. El Cerrito, cA 94530

State Water Resources Control Board 1001 I Street Sacramento, CA 95817-2815 12/27/16 Dear members of the Board I am concerned about The presence of 1, 2, 3TCP, a carcinogen present in The drinking water of many Low - income rural communities in our state. Please set the durking Water standard at 5 ppt Redetection limit, thes will help to protect public health in these poor commonities and allow water systems to win the water meatment costs from sellers of posticides contaminated with this chemical Sincerely Junda & Cain Linda S, Cain 1438 Everett St. El ceprito, CA 94530

12/27/2016

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 Known drinking water sources in California. These are largely in low-income, rural communities where faulty pesticides were sold.

I uge you to set the TCP drinking water standowed at 5ppt - the detection limit - to protect public hearth B and allow water systems to recoup water treatment costs from the companies that sold the containinated pesticides.

Sincerelief,

Ben Platt-

1216 Rivera St. El Cerrito CA-94530

Libertv Water Lesoncer Control Brand 1001 T St CA 95812-2815 Sacramento Jec 29, 2016 Dar Members of The Board: , 2,3 TEP is a man-made carrienogen That containinates 372 Known California dunking water Sources, longely low income rural communities where faulty pesticides were sold Please set the TCP dunking water standard at Sppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs iom The companier that sold The contaminated perficides Sincerel Georgia Fuzelana Javellier El: Cervito, CA 94530

12/30/16 Dear Members of the board 1,2,3 TCP is a man-made Carcinogen that Contaminates 372 Known California drinking water sources, largely in low income rural Communities where faulty pesticides were Sold Please Set the TCP drinking water Standard at 5 ppt (the detection limit) to protect public health and allow water systems to recorp water treatment costs from the companies that sold the contaminated pesticides Sincerel Katrina Turman 2840 Actams St. Alameda, CA

### 14FEB17

### Dear Member of the Board,

Safe, clean water is very important to as all. 1,2,3 TCP is a man made carcinogen that contaminates 372 known California drinking water sources, langely is low-income rural areas where posticides were sold.

Please set the TZP drinking note standard @ 5 PPT ( the LLOD) to protect public health and allow water systems to recomp treatment costs from companies that suld the contaminated pesticredes.

Sincerely,

132 Oper Ave, Reduced City, Ut.

13 ear Members of the Board 3 TCP man-mede 372 k <u>carcin ogen</u> , , , 6007 deinking water sources where jalo <u>e</u>s ore 50 TCP Icino Please drin Set the  $\omega$ at de Star ppt, da. proted 94122 FY COM C.

State Water Resources Control Board 1001 | Street Sacramento, CA 95812-2815

January 19, 2017

Dear Members of the Board,

1,23,TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides have been sold.

Please set the TCP drinking water standard a 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides. B

Sincerely,

Nathan Cheng 5932 Jordan Ave. El Cerrito, CA 94530

tems to recomp water signnews to recomp water treatment wates from the companles that both the companies that both the contamin-

Thank you Exneway, Barah A Joung 516 A Date St SE, CA 94102

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Peb 23,2017 Dean, humbers of the isoand,

12,3 TEP is a man-made culanoyen that which white 372 Ruden California windong. Water sources, langeig in 2000 inder sourc

In these times, we need to water, extra hand to protect our water, please net the Tap hindingwater standard at 5 ppt (detection limit) to protect public.

Monday, January 25,204 Dear Members of the board, 1,2,3 TCP is a man made carcinogen Cat contaminates 372 Known California Anikting Water souver, largely in Iow-intome vural communities where failty pesticides were Sold. Please set the TCP divinking water B Standard at Spot (the detaction limit) to protect public health and allow water Fitens to vecon Water treatment Corts tran the companies that sold the contaminated perficides. quevely, HEAL THE EARTH! Nathaniael 1431 Ward St Derkeley, CA 94752

State Water Resources Control Board January 23, 2017 1001 I Strent/ Sacramento, CA 95812-25 Dear Members of the Boord, 1,2,3 TCP is a man-made carcinogen that contaminates 372 Known California drinking water sources, largely in low-income rural communities where faulty pesticides were

2219.

Please set the Tip drinking water B Standard at 5 ppt to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Greg Hamilton 14/23 Berteley, CA 94702

HeveElmines 2005A Palkar H. Berlieley CA J4704

CA State Water Resources Control Board

1001 I ST. SACRAMENTO, CA '95812'-2815

Dear CSWRCB members

1,2,3 TCP is a man made carcenogen that contaminutes 372 known California disiling water sources, largely in low income sural communities where faulty pesticides were sold.

1/23/2017

Placese set the TCP dimbus water standard B at 5ppt (the detection limit) to protect public health and allow water orptems to recomp water treatment costs from the companies that sold she contaminating perticides. Since aly, Steve Edimends

1/23/17 Dear members of the board: 1/2/3 TOP 15 a Man-made carcineser that containingtes 372 Known california drinting water sources, largely in low income rural communities where faulty Resticides were sold. Please set the TCP drinking water B standard at Sppt (He detection limit) to protect public health and allow water Systems to recour unter treatment costs from the companies that sold the contaminated Pesticides. Sincerely HDa. Dol Derby st. Berkeley, CA. 9470/

January 19, 2017 Dear Members of the Board: 1,2,3 TCP is a man made <u>Carcinogen</u> that Contaminates 372 known California drinking Water sources, largely in <u>Iow income</u> communities Where failty pesticides were sold. Hease set the TCP drinking water standard at 5ppt (delection limit) to protect public health and B allow water systems to recorp water treatment costs from the companies that sold the contaminated pesticides Sincerely, Junnifer Kemper 2334 Tulare Ave Ef Cerrito, CA 94547 P.S. Please de my 2-year old daughters, the future gueration, drawing of water. Please help keep our water clean. She calls this drawing "Wa Wa"

Dear Member of the Board

1.2.3. TCP is a man-made careinagon that Contains and ingredients that containinates 372 known CA dreinling water sources, largely in law income Rural communities where faulty pesticides were sold.

Fremont, 01.20.1\$

Please set the TCP deinling water standard B at 5 ppl to protect public health and allow water systems to recaup water treatment costs from the companies that sold the contaminated posticides.

let's consider our and anchildren's Future!

Thanks for your consideration Kind Regards, S. Uning 28561 Farwer Disive

20 January 2017

# Dear Meabers of the Board,

1, 2, 3 TCP is a man-made carcinogen that cutominite 372 Known California drinking water sources, longely in low meme much consumities where faulty pesteerlas were sold.

Please set the TCP drinking waiter standard at Spot B to protect public health and allow water systems to recomp writer treatment costs from the comparine that sold the contaminated pesticulas.

Sincerely Radauser

Michael R. Adamson 5242 Varnon Ave. Fremant, CA, 94536 1/19/2017 Dear members of the board, 1,2,3 TCP is a manimade carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

107

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treat ment costs from the companies that sold the contaminated perticites.

Sincerely,

Kyle Jansson

Am

509 Everett St El Cerrito CA, 94530

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### Caller 02/23/17

Dear Members of the Board,

1, 2, 3 TCP is a man made concinegen that cantaminates 372 <u>Enews</u> ralipannia drinking water sawces, largely in low microne surral committee where faulty pesticials were sailed.

please set the TCP drinting water standard (c Spp+ (the detection limiter to pratect public B wallth & allow water suplant to recamp water dreatment cousts from the companies that sald the cartonination pesticidy

Senceruly,

Edistance Thempson

1010 Las Cuijas San Rabaul (CA 94903

February 23, 2017

Dear Members of the Board 1, 2, 3 TCP is a man made carcinogen that contaminates 372 Known Calibornia driuking water sources, largely in low income rural communities where faulty pesticides were sold. Please set the TCP duililing werker shandowds at 5 ppt (the detection limit) to protect public health and allow water systems to recomp water treatment costs from the companies that sold the contaminated pesticides

Sinecocky Givant Walters And Shlett 851 Del Giana do Rd Sau Rafael, Ca 94903

1/17/17

)ear Members of the Board:

1,2,3 TCP is a man-Made cardinogen that contaminates 372 Known CA drinking water Sources, langely in low-income rural Communities where faulty pesticides were sold.

Please set the TZP drinking water stankart at 5ppt (the detection B limit) to protect public health & allow water systems to recorporater treatment casts from the companies that sold the contaminated pesticines.

Sincerely, Teresa Savin 30 1 Moultriest San Francisco CA 94110

1/12017

DEAR MEMBERS OF THE BOARD,

1, 2, 3 TCP 15 à man made carginogen that contaminates 372 Known California drinking water sources, largely in low income rurail communities where fauthy pesticiales were sold. Please set the TCP drinking water starbard at B 5 ppt (the deleastion limit) to protect public health and allow water systems to recar water treatment costs from the companies that sold the contaminated pesticides.

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Sincereday,

MARIO MORGUÍA UNA UNA CULE 241 MOUSTRIE ST. S.F. CA. 94110

## 12/21/10

Dear Members of the Board

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

12

Please set the TCP drinking water standard B at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Gabriel Bloom 1405 Third St. Alameda, CA 94501 State Water Resources Control Board 1001 | Street Sacramento, CA 95812-2815

December 21, 2016

Dear Members of the Board:

As you may know, 1,2,3 Trichloropropane (1,2,3 TCP) is a man-made carcinogen that has been found in nearly 100 water systems in California, including those serving many rural agricultural communities where the faulty pesticides were used.

Please set the TCP drinking-water standard at 5 ppt (the detection limit), as proposed by the State Water Board in its preliminary recommendation. This would protect public health and allow water systems to recoup water treatment costs from the companies that sold contaminated pesticides.

Sincerely,

Edward

The Rev. Edward E. Thompson 416 Santa Clara Ave. Alameda, CA 94501 31 January 2017

Dear Members of the Board:

1, 2, 3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Whn 1624 TRESTLE GLEN ROAD OAKLAND-CA 94610

31 January 2017

Dear Members of the Board:

1, 2, 3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Stravt Kendall 1621 Trestle Glen Rd. Cakland, M 94610

31 January 2017

Dear Members of the Board:

1, 2, 3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public B health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

2 Trostle Blen Rd Oakland 94610

1/4/2017

Wendy Fiering 924 Everett St. El Cerrito, CA

State Water control Board 1001 | Street Sacramento, CA 95812

Dear Board Members:

I am concerned about drinking water quality throughout California. In particular, I believe we should protect ourselves from 1,2,3 TCP, a manufactured carcinogen that contaminates many drinking water sources, including many low income rural communities in California.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Wendy Fiering

B

#### 1/4/17

Dear member of the board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Kim Yip 906 Everett St. El Cerrito CA 94530
State Water Resources Control Board 1001 I St Sacramento, CA 95812-2815

Dec 27<sup>th</sup>, 2016

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

В

Sincerely,

Aman Parikh 1236 Cabrillo St El Cerrito, CA 94530

December 30, 2016

Dear Board members.

1,2,3 TCP is a man made Concinergen that containinates 372 benown California drinking water sources, mostly in low means surse communities where facility pasticides were seed.

I ask plat you set she TCP drinking water standard of fino PPT ( who detection limits ) to probet The public health and allow water sigtimes to recoups water treatment costs from the companies that soad The contaminated pertucides.

A mierely? mode W. Folsom 2841 adams Street alamoda, Ca 94501

February 13, 2017

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water source, largely in low income rural communities where faulty pesticides were sold.

The right to clean water should not be a political issue. This is a matter of public safety. The profits of corporations like Dow and Shell should not be given precedence over people's health and well being.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health an allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Krista Farey, Vishwanath Lingappa, Anuradha Lingappa 626 Pacheco St San Francisco, CA 94116

121 Feb. 12, 2017 State Water Resources Control Board Dear Member of The Boards 1,2,3+CP in e man made l'acconogen : alt is Anon to Confaminate 372 Colifornia drinking water sources, mainly in low moome rand communities where failly perturider weie Please profect public health by sold setting the top during which en standard at 5ppt/ the detection Simit) allowing water forten To recover meter freatment Casts from The Nompanier that Sold the containing ed pertied on Sincerely, Fernence attel 846 Packeco St. Sam Francisco, CA94/16

Tesmo Masin.

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Lear Maniford He House

12,3 TOPA a min made concerners that contaminates SP2 Antion Crigenia stating water courses day to an dres in one qual consideration after gutte preticides service 10 the

Active set the CP strating setter B stimulars it 5 pot office substance sont) B to particle marked setter and substances water and the to manie that we water the docta from the companie that we for the contained particular.

Sincerely On Malani 20 Main Le San Rajael Oc 94901

## February 17, 2017

State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

RE: 1,2,3 TCP

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Sincerely,

ly Brone

Molly Brown | 907 Santa Fe Avenue Albany, CA 94706

December 30, 2016

Osan Members of the Board: 1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, sengely in low income nural communities where faulty pesticides were sold. Please set the TC patrinking water standards at 5 ppt B (the detection limits to protect public health and allow water systems to secoup water treatment wats from the companies that sold the contaminated pesticides.

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Sincerely, Cocherine M Jolson

Dec 29, 2016

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

C

B

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely

Almee Haire 1405 Scott St El Cerrito CA 94530 January 17, 2017

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

В

Sincerely,

Marcy Kaufman 224 Moultrie Street SF, CA 94110

## DEAR MEMBERS OF THE BOARD: 1,2,3 TOP IS A MAN - MADE CARCINGEN THAT CONTHINATES 3TZ KNOWN CALIFORNIA DRINKING WATER SOLOCES, LARGERY IN ICU INCOME RUPPL COMMUNITIES WHORE FAUTLY PESTICIDES WAVE SOLO. PLEASE SET THE TOP DRINKING WATER STANDARD A 5 PPT (THE DETECTON LIMIT) TO PROTECT B RECOUP WATER TREATMENT COSTS FROM THE COMPANIES THAT SOLD THE CONTRAINATED POSTICIDES

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SINCRELL

TATE DOBBINS Tat DUC

1708 FIFTH AVE, SAN RAFAEL CA 94901

1/17/17

Dear Members of the Board:

1.2.3 TCP is a man-made Carcinogen that contaminates 372 known California drinking water souces, largely in low income rural comunities where faulty pesticides were sold.

Please set the TCP drinking widter standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment B costs from the companies that sold the contaminated pesticides.

Sincerely,

Mai Otake 443 Prentiss St. S.F. CA 94/10

State Water Resources Control Board 1001 | Street Sacramento, CA 95812-2815

January 19, 2017

Dear Members of the Board,

1,23,TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides have been sold.

Please set the TCP drinking water standard a 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides. B

Sincerel Katherine Cheng 5932 Jordan Ave. El Cerrito, CA 94530

21617 Dear Members of the Board. 1,2,3 TCP is a man-made carcinogen that Contaminstes 372 Known California drinking water Sarces, largely in low-income rural committees where faulty pesticides were sold. Please set the TCP winkipp water standard 5 Ppt (the detection limit) to protect public health and allow water system's to recoup water treatment costs ton the companies that sold the contaminated pesticides. ... .. Sincerely Jatie Brohawn 234 Yale the Kensington, CA

February 17, 2017

Dear Members of the Board

1.2.3 TCP is a man-made cancingen that contaminates 322 Known California drinking water services. langely in low income raral communities where faulty pesticides were cold.

Please set the TCP drinking water standard at Sppt. (The direction limit) to protect public health and adden water systems to recoup **B** water treatment costs from The companies that sold the contaminated pesticides

Sincerely,

Lauren Makasato 1695 Perulta Avenne Albany, CA 99766

## Laurel R. Weeks 2063 Oregon Ave, Redwood City, CA 94061-2507

State Water Resources Control Board 1001 | Street Sacramento, CA 95812

February 15, 2017

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources – largely in low-income, rural communities where faulty pesticides have been used.

I encourage you to please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

В

Sincerely,

Laurd R Week

Laurel R. Weeks 2063 Oregon Ave Redwood City, CA 94061-2507

State Water Resources Control Board 1001 Street Sacramento CA 95812-215

2/9/17

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

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Sincerely,

Frih

Erin Fieberling

1556 Trestle Glen Road Oakland CA 94610

Decer Members of the Board: 1, 2, 3 TCP is a man-made carcinogen that contaminates 372 known Calibornia water sources, largely in low income unal Communities where facety pesticides were sold. Please set the TCP drinking water standard B at 5 ppt ( the defite detection limit) to protect public hereth and allow water systems to recoup water heatment costs from the companies that sold the contaminated perticulas

Feb. 7, 2017

Sincerely,

Scott Whiteles

325 Hillview Dr. Fremont, CA 94536

2/10/17 Pear Members of the Boards In our populated and agrarian state, water is the most precious commodidy available. Wethout access to clean water out cities would not be able to sustain their populations, our agricultural production would plummet, and our economy would gread to a half. To that end we must do everything in our B power to safequard this istal resource. 1,2,3 TCP is a man-made carconogen that contaminates 372 known California dranking water sources, largely on low meane and mil Communities where fan thy pesticides are sold. Please set the TCP dranking water standard to 5 pp-1 (the detection limit) to product public health and allow water systems to recomp tradment with From the companies that sold the contaminated pestacides. Syncerely, Gesare Mann-Solverman 966 500+7 01 Oakland CA, 94610

1/4/2017

Haven Fiering 924 Everett St. El Cerrito, CA

State Water control Board 1001 | Street Sacramento, CA 95812

Dear Board Members:

I am concerned about drinking water quality throughout California. In particular, I believe we should protect ourselves from 1,2,3 TCP, a manufactured carcinogen that contaminates many drinking water sources, including many low income rural communities in California.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Haven Fiering

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В

Julie Sonksen Upper Echelon Vintage LLC 25538 Delmar Avenue Hayward, CA 94542

(510)944-5905 upperechelonvintagel@gmail.com

## January 1, 2017

State Water Resources Control Board 1001 | Street Sacramento, CA 95812-281

Dear Members of The Board

By way of introduction I am a concerned citizen: I'm contacting you in regards to 1,2,3 TCP, a man-made carcinogen that contaminates drinking water sources throughout California, a matter that should be taken extremely seriously. The main contamination is largely in rural low-income communities, where the population is disadvantaged and underserved, where faulty pesticides were sold.

To elevate this unhealthy and dangerous condition, and to ensure the future health of children in California the 1,2,3 TCP drinking water standard should be set at 5ppt, the detection limit, to protect all citizens and allow water systems to recoup their water treatment costs.

The citizens of California rely on <u>YOU</u> to provide them with the heathlest and safest drinking water possible. This Call To Action Should NOT be ignored!

Sincerely,

Julie Sonksen

3.8 1/4/17 Dear Members of the Board: 1, 2, 3 TCP is a man adde concraogen that Contaminates 372 Known California diraking waty Sources, largely in low acome communities where faulty pesticides were sold. Rease set the TCP dim king weter standad at 5 ppt to protect public health and B allow weter systems to recoup water theta t assts from companies that sold the contamanted pesticidas. Sincerely, Mar Loph 843 Evenit St

21 Cen. 76, CA. 94530

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1/4/17

pear nembers of the Board:

1, 2,3 TCP 15 a man-made carcinogen that contamnates 372 known Celifornie drucking voter sources, largely in low income rural communities where faulty perficides were sold.

Please set the TCP druking vater standard at 5 ppt. (the detection lemit) to B protect public health and allow water B systems to recomp water treatment costs from the companies that pold the containinated perticides."

Succeiely,

Tlar Yamarahi 843 Everett Street El Cerrito, CA. 94530

1/9/2017 Dear members of the board: I'm really concerned about how are water supply is being affected by 1,2,3 TCP! It's affecting water sources necessary for life. I ask that you set the TCP drinking water standard at Sppt (the detection limit) to B Protect our health and allow water systems to recoup water treatment costs from the companies that sold the contamitad pesticides. Sincerely, Stephen Loper 1760 Walnut St El Cerrito, CA 24530

Chris Knipp 1704 Walnut Street El Cfrrito CA 94530-1919 (510) 215-6906

January 9, 2017

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detecteion limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Thank you.

Sincerely, Chris Knipp

1704 Walnut St. El Certito, CA 94530

В

Dear Members of the Board:

1,2,3-TCP IS a man-made cardnogen that contaminates 372 Known California drinking water sources, largely in 10w income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at Spot (the detection limit) to protect public health and **B** allow water systems to recoup water treatment Costs from the companies that sold the contaminated pesticides.

SIncerely, Atom Patrola Stephanie Patrield 1616 Norvell St El Cerrito (A 94530

1/24/17 Dear Members of the Board: 372 drinking water sources in CA and contaminated by 1,2,3 TCP - a man-made carcinogen. Must of this contamination occurs in low-in come reval communities where faulty pesticides were sold. Please protect public health and set the TEP B drinking water standard to the detection limit (5 ppt). We also ask that you allow water systems to recomp treatment costs from the companies that sold the continuinating pesticides.

Sincerely, J. Owen Limbach + D. Kristopher Meadons 3929 Everett Ave, Unit B Oakland CA 94602

Jan Draigh

Dear member of the Board;

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking inster sources, largely in low-income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect ymblic health and allow water systems to recorp water treatment costs from the companies that sold the contaminated pesticides. Ihank you.

> Sincerely, Tiri Gruenandd Teri Gruenandd 4364 Jownsend Ave. Oakland, CA 94602

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1/24/2017 Spake Water Resources Cound Board Smeet 1001 - TSawamerhi, C17 95812-2815 Dear Monhers of the Bound: 1, 2, 3 TCP is a man-made Carenogen mat contaminates 372 Known California dunking water Sources, largely in ton income rural communities where fully pesticides were sold. Please set the TCP drinking water Standarde B Spot ( The detection limit) to protect public health and alter water systems to vecry water meatment costs from the companies That sold me contaniinatal peshicides Sincerely, 14 Jan Thompson 3844 Randolph Ave, Oakland, CA 94602

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Feb. 22,2017 Dear Members of the Board: 1,2,3 TCP 13 a man-mode carcinogen that contaminates 372 known CA drinking water sources, largely in low income rural communities where faulty pesticides were Sold. Please set the TCP drinking water standard at 5 ppt (detection limit) to protect public health and allow water B Systems to recoup water treatment costs from the companies that sold the contaminated pesticides. Sincerely, Leah Duffy 260 Center St., San Rafael CA, 94901

Itate Water Resources Control Board 1001 I Street Jacramento, Mar 15812-2815 Jebruary 23, 2017 Lear Member of the Board that contaminates 372 Known Ralifornia drinking water resources, largely in low income rural communities where faulty perticides were so TCP drunking water standard DRAD B at 5ppt ( the detertion limit ) to protect pu health and allow water systems to recorp water treatment costs from the rompanies. that sold the conteminated pesticides. emporaly. Inglia De Groebe 591 Tamarack Dr. Ja 94903 an Ratal 0.11-

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JEloz, 2017 The StateWater Resources Control Board DEAR MEMBERS of Board, The wan-made carcinogen-1,2,3TCP that containinates 372 known CA drinking water sources, largely Effects low mane rural Communities where faulty pesti-Cides are sold. MEase set the TCP drinking B Water standard at Spot-the defection limit to protect public healthe and to allow water Sustens to recorp water freshment Gosts from the companies that Sold the contaminated pesticides SINCERE/4, Andrea Dawson 1892 TIFFIN Road 415-265-4265

State Water Resources Control Board 1001 1 Street Sacramento, CA 95812-2815 2-2-17 Dear Members of the Baard: 1,2,3 TCP is a man-made carcinopen that contaminates 37-2 known California drinking watch sources, largely in Ion income nival communities where famling proticides were sold. Please set the TCP drinking water standard B at Sppt (the detection limit) to protect public health and allow water systems to recoup water treatment dosts from the companies that sold the contaminated pesticides. Sincerely, Jenifer Ancona 1715 demms Road Dahland CA 94602

February 7, 2017 Dear Members of the State Water Resources Control Board, 1,23 TCP is a man-made carcinogen that contaminates 372 Known California dinking water sources, largely in two income rural communities where faulty pesticides

Please set the TCP drinking water standard at B 5 pp+ (the detection limit) to protect public health and allow water septems to recorp water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Kenee Gilf 37955 2=51. Fernant, CA, 9:4536

San Francis a Jon 18/2017 V Dion Member of the Board 123 TOP is a nan made concinogen the contamina tes 372 Known coloponica trinking water Sources. Largely in how income rural commune miters where Faulty Pesticides were Sold. Plusse set the TCP drinking areter standard at 5 ppt ( the detection dimit ) to protect B Public hust hand allow water System to Recoup water Trustment cos T. from the companies the sold the contaminated Posticides

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Sincerely, Ernesto des corre 249an dersom ST. S. FCA. 94110

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1/24/17

Deal Members of the Board 1,2,3 TCP is a mad-male carcinogen that contaminates 372 Known CA drinking water sources, largely in low income rural communities where for-Ity pesticides were sold. Please set the TCP drinking water standed at Spet to protect public health and allow water systems to recoup water treatment costs from the systems to recoup water treatment costs from the companies that sold the contaminated pesticides,

Sincelet,

Desmond Mullard 3742 Randolph Ave, Onkland, CA 94602

Januar Y 24, 21 Dear Members of the Board: 1,2,3TCP is a man-made carcinogen that contaminates 372 known california drinking Water sources, largely in low income rural communities where faulty pesticides Please set the TCP drinking water standed to at 5ppto Protect public health and allow water systems to recup worter treatment costs from the companies that sold the contaminated pesticides. Chloe Cooper 7 years

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### Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Date

3895 Frührvele Are Oakland, CA 94602

155 02/07/2017 Dear Members of the Bound 1,2,3 Tel 15 a mon-make servinogen that Contaninates 372 Known California danking hasting Sources localy in low incom sural communities when Failey pesticites were Soil Place see the Til drinking stordand at 5 ppt to SIncerely Clifford Byland 2923 Fruivale Ave O-Km7, 1A 79602

56 State Water Resources Control Board 1001 I Street Sacramento, (A 95812-2815 2-6-17 Dear Members of the Board: 1,2,3 TZP is a man-made Carcinogen that contaminates our (Californa's) В drinking water sources, langely in low income what communities where faulty pesticides were sold. please set the top drinking water Standard at Sppt to protect public health. Sincerely Juonne Milhan Mh 906 Telesita Blvd. SF (+99107

12/21/16 DEAR MEMBERS OF THE BOARD: 123 TUP IS A MAN-MADE CARLINGEN THAT GRAAMMATES 372 KNOWN CAMPORNIA DRIMKANG WATER SERVES, LARGELY W LOW MOME RURAL COMMUNITIES WHERE FRANKY PETUMES WELE SOUP PLEASE SET THE TOP DRIMANG WATER B SNAMDARD AT 5 ppt (the protection) UNIT TO PROTEET FUBLIC MEDITA AND ALUN WATER STEPAS D RELIE WATER TREATMENT COSTS REST THE WARANES THAT SOND THE CONTAMINATED PETTICHDES SINCENER, MEGHAN Marikhouz 3426 RUBY SOULET Opiciano la auloog

:1/27/2017 . members of the Board; J. TCP is a man-made carcinogen that contaminates 372. un California drinking water Sources, largely in low income al communities where faulty pesticides were sold ase set the TCP drinking water stand and at 5ppt (The tection limit) to protect public health and allow water ast sold the contaminated pesticides. sincerely, THORSTEN CLAUS TOURS 1639 DWIGHT WAY Name fadress BERKELEY, CA 94703

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Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticedes.

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Sincerely Steve Edlen

2442 McGee Ave Berkeley, CA 94703

Jan 25, 2017 Dear Members of the Board-12,3 TCP is a man made estrenogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold. please set the TCP drunkeng water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatments costs from the companies that sold the contaminated pesticides.

Succerely,

Mary and Jim Smith

B

#### January 25, 2017

State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

Ref: TCP Drinking Water Standard

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the current detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Sincerely, annino MODI

Janice Wenning 1707 Curtis St Berkeley, CA 94702

1/25/16 Dear Members of the State Water Resources Control Board -1, 2, 3 TCP is a human-made carcinogen that contatainates 372 Known California drinking water sources, largely in lew income rural communities where Farity peshicides were sold. Please set the TCP drinking water standard В at 5 ppt (the detection limit) to protect public peath & allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sin Gerely, Lynette Ubois Lynutherbin 1412 Hearst Are Berkeley CA 94702

### 25 January, 2017

Dear Members of the State Water Resources Control Board:

There are currently many families living within the area where the chemical 1,2,3,TCP, a man made carcinogen, is contaminating the drinking water of 372 known California drinking water sources. Most of these are in low income rural communities where faulty pesticides are sold.

Please use your position on the board to set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Sincerely,

Julie McNamara 1442 Delaware St. Berkeley, CA 94702

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165 Iris Haloks San anselmor 3-2-17 DE-ar Members of the Bord 1.23, TCP is a man-made carcinogen that contaminates 372 Man California chrinking water sources, largely in low income rural communities where fourly pesticides\_ Works sold. Please set the TEP drinking water standard at 5 ppi (the detection limit) to protect public hefth and allow water sistems to re-coup Water treatment costs from the companies that sold the contaminated pestisides. Sinsere 1-1/2 Fristhaulles 7. Veave old.

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B

Susan Merriman 1302 Holman Road Oakland CA 94610

January 26, 2017

State Water Resources Control Board 1001 I Street Sacramento CA 95812-2815

RE: 1,2,3, TCP

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Susan Merriman

Devon Merriman 1302 Holman Road Oakland CA 94610

January 26, 2017

State Water Resources Control Board 1001 | Street Sacramento CA 95812-2815

RE: 1,2,3, TCP

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Devon Merriman

6'7

March 22, 2017

State Water Resources Control Board 1001 | Street Sacramento, CA 95812-2815

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely **Diane Smader** 

Diane Smader 860 Helena Drive Sunnyvale, CA 94087

169 embris of the Board DEGTW I am Very concerned because 3 JCP, a man made carcingogen that is known to be in the danking water sources of 372 Califoring C. Fign. Hs you deliberate the TCP drinking В Water Standads please set the Standard a 5 ppt. Add thoughy allow the necovery of water treatment Cost from the companies that sold the contaminated pesticides. othe eight thing - I 10 your Morel EY, CA 9494 415-389. 8945 Carycz Carrillo @ gmail.com







Johnston 258 Grand Street Redwood City CA 94062

State Water Resources Control Board 1001 I Street Sacramento CA 95812-2815

February 19, 2017

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticidies.

В

Sincerely,  $\mathcal{Z}$ John Johnstoh 258 Grand Street Redwood City CA

Tuesday, February 28, 2017

State Water Resource Control Board 1001 | Street Sacramento, CA 95812

Dear members of the board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 know California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

В

Regards,

Philippe Acheritogaray 118 Yolo Street Corte Madera, CA 94925

## 3/1/17

Pear members of the board: 1,2,3 TCP is a man-made carcinogen that Contaminates 372 Known California drinking Water Sources, largely in low income rural communities Water Sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water Standard at 5 ppt (the detection limit) to protect public health and allow Water Systems to recoup water treatment costs Prom the companies that sold the contaminated Pesticides.

В

Sincevely, Bina & Kothyn Cunnyngham 17 Hawthorne Ave, San Anselmo, CA

Pena is an 8th grader at San Domenico School in San Anselmo, CA.

Johnston 258 Grand Street Redwood City CA 94062

State Water Resources Control Board 1001 I Street Sacramento CA 95812-2815

February 19, 2017

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticidies.

B

Sincerely,

Susan Johnston

258 Grand Street Redwood City CA

272 Whitelem Dr Palo HIto, CA 94302

March 8,2017

Dear Members of the Board,

I'm writing to request that you set the standard for TCP in drinking water to <u>5 ppt</u> (the detection limit), **B** to protect public health, and also to allow our water systems to recoup water treatment costs from companies that sold contaminated pesticides. These were sold in largely low income rural communities and therefore they disproportionately affect the health of poor populations.

Sincerely, fullight Jeff Wolfabl

Thursday, March 9 2017 Dear members of the Board: 1, 2, 3 TCP is a Man-made carcinogen that centaminates 372 known California drinking vater sousces, langely in low income oural communichies where faulty pesticides were sold. Please set the TCP drinking water Standard at B 5 ppt (the detection (imit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminate peshicidg. Sincerely, Meredit martin 2697 COWPER &T PANO ACTO CA 94306

March 09, 2017

B

To: State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

Dear Members of the Board:

1, 2, 3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Natasha Funck Funci Naterel 10-

2701 Waverley St Palo Alto, CA 94306

3/13/17 Dear Members of the Board: 1,2, 3 TCP is a man-made carcinogen that. contrained 372 known California drinking water sources, largely in low income curst communities where faulty pesticides where sold.  $\langle \cdot \rangle \neq \langle \cdot \rangle$ Plance set the TCP dividing standard of Bppt B (ik dedection limit) to protect public health alian moder systems to recoup water and cosis from the companies that sold Artication tis continuorated perticides. Sincerely So 2-8 3670 Ross Rol. Palo Alto, CA 94303



13<sup>th</sup> March 2017 Dear Members of the Board:

1,2,3-TCP is man-made catcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where contaminated pesticides were sold.

Please set the TCP drinking water standard at the detection limit of 5 ppt to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

В

Sincerely Ph.D.

CLIVE A. HENRICK 3177 MANCHESTER CT PALO ALTO CA 94303.

# Maich 8. 2017 .

To Members of the State Water Resources Board. 1001 I Street Sacraments, 94 95812 - 2815

Dear members of the Board

1,2,3 TCP is a man made carcinogen That contaminates 372 known California drinking water sources, largely in known erval communities where faulty pesticides were used.

Please set The TCP divinkaky weter standard at Sppt (The B detection limit) to protect public health and allow water systems to recomp water treatment costs from The companies That sold The contaminated pesticides.

Shcereby,

Patry wip/h Pathy wipfler 4114 Willman Drive. Pali Alto, CA 94306-3835

8 March 2017

From

Carlin Otto 231 Whitchen Court Palo Alto, CA 94306

To Water Board of California

Den Members of the California Water Board:

All of us need and should have clean, healthy drinking water. Please protect California water by setting the detection limit for 1,2,3TCP of В 5 ppt for all sources of drinking writer. I hope and support making the manufacturess of products that pollute our waters responsible of products that pollute our up polluted areas for the costs to clean up polluted areas and sources of water for drinking.

Sincerely Carlin Oth

april 6, 2017 Dear Members of the board. 1, 2, 3 TCP is a man made carcinogen that contaminates 32 know California drinking water sources, largely in ladincome vural communities where faulty pasticides were sold. Clease set the TCR drunking water Standard at Siggs (The detection hund) to protect public health and allow water systems to record water realment costs from the companies that sold the contaminated pesticides! Sinceiley, tol C Ky 2013 Monroe Ave Jel mont, 94002 Calif asi in

B

TO: STATE WATER RESOURCES CONTROL BOARD 1001 1 STREET SACRAMENTO, CA 95812-2815 APRIL 6, 2017 Members OF THE BOARD 1,2,3 TCP 15 A MAN MADE CARCINGGEN THAT IS CONTAMINATING 372 KNOWN CAUFORNIA DRINKING WATER SOURCES, MOSTLY IN LOW INCOME RURAL COMMUNITIES WHERE FAULTY RESTICIDES WERE SOLD. PLEASE PROTECT PUBLIC HEALTH AND ALLOW WATER SYSTEMS TO RECOUP WATER TREATMENT COSTS FROM THE COMPANIES THAT SOLD THE CONTAMINATED PRODUCTS PLEASE SET THE TCP DRINKING WATER B STANDARD AT 5PPT (THE DETECTION LIMIT). THANK YOU. ROBERTA STAUFFACHER Belmont, CA 94002

86 Fremont, Feb 7th 2017 Dear members of the Board, 1,2,3 TCP is a men-made concing/m that contaminates 372 Known Calfornia drimtant, water sources, largely in low income and communities where faulty perticiples Please, set the TCP drinking worth standard at Sppt (the detection eimit) to protect public health and allow water systems to were sold. В recouperante water treatment costs from the companies that sold the contaminated peticiples. Oplania Acenta Eppler Sincerely,

. . . . .

36911 HONTECITO DR FREMONT; CA 94536

March 23, 2017 Dear Members of the Board: 1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in los income rural communities where Faulty pesticides were sold. Placese set the drinking water standard at В Sppt (the detection limit) to protect public. health and allow water systems to recomp water treatment costs from the companies that sold the contaminated pesticides. Sincerely Krister Benett 6 Amicita Ave Mill Jalley, CA 94941

MR. & MRS. STUART WINBY 2295 OBERLIN STREET PALO ALTO, CA 94306

marce 6, 2017 Dear mambers of The Board: 1, 2,3 TCD 15 a mon-made carcinogen Mat contaminates 372 Known Californie drinking worder sources, largely in loa uncome rural communities where faulty petercides mere sales. Please Set the TCP durking water B Standad @ 5 pot to protect public health and allow water to recomp uder treatment costs from the comprise that sold the contaminated pesercides-Sencerely, Mary Comby PhD 2295 Oherlin St Malutto, (& 983d

18.

March 10, 2017 PLAN Member of the Board: 1,2,3 TEP is a man-made carcinogen that contabuinates 372 Known Colifornia drinking water sources, largely in low-income unal communities where facely pesticides were sold. Please set the TCP dimbing water R staulard at 5 ppt (the defection limit) to protect public health and allow water sistems to Necoup water treatment costs From the companies that sold the contaminated pesticides Sincerely, any bright 1571 Dana Avenue Pato Ato, A 94303
40 Juli Hughes 152 Seale Au Palo Alto, CA 9430/ State Water Resources Contral Board 1001 IStheet Sacramento, CA 95812-2815 Mar 14, 2017 Dear Members of the Board'. 1,2,3 TCP is a man-made carcinogen that Contaminates 3-12 known California drinking water sources, largely in low income rural communities where faulty peaticides were rald. Please set the TCP drinking water standard at 5 ppt (the detection limit) В to protect public health and allow water systems to recoup water treatment Casts from the companies that sold the Contaminated pesticides. Sincerely,

Julitugher

March 14, 2017

State Water Resources Control Board 1001 I Street Sacramento, CA 95812

Re: 1,2,3 trichloropropane water standard

Dear Members of the Board,

1,2,3 TCP is a manmade carcinogen that is known to contaminate 372 California drinking water sources, largely in low-income rural communities.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health. Please also allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Thank you.

Sincerely,

Joan S. Stauffer

357 Kellogg Avenue Palo Alto, CA 94301

Moder Resources Control Board Sap streat 1001 (A 9.5812-2851 Sac lame als March 8 2017. Dear Nerviers of the band yn ioncerned about ,23 TCP a men known to conto minuto le (alcinigen drinking water SOULCES Californian nates sta leave set the TP Sppt to proted public Sincent Nico Naabha Way, Palo lem CA

3/18/17 Dear Members of the Board, 112,3 TCP is a man made carcinogen that contaminates 372 known California drinking water sources largely in low income sura communities where failty pesticides swere sold Please set the TCP drenking walu standard at 5 ppt (detection limit) to protect the public health allow water system and Mony water treatment Cosla from the companies that sold contaminated pesticides the Sincerely Marales Cui Sinton SOMERSET PLACE

3/2/17 Dear Members of the Board: 1,2,3 TCP is a man-mode carcinogen that contaminates 372 Known California drinking water sources, largely in low income rural communities where failty: pesticides were sold Please set the TCP drinking water Standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides. Sincerely, Kimberly Hawks (Kimberly Hawks) 14 Agatha Ct. San Anselmo, CA 94960 phone: 415-310-7351

qL

Fast Carlo Sta 40023 Doa ensila 12  $\ll \gamma \gamma \gamma$ macin e.s, <u>Kan</u>ta Reset The? ¢. В 15 のの OB 感怒感 Since Lila 14 Andralmora Sam 1

1125/16 Dear Members of the Stak Wath Resources Contol Bond -1,2,3 TCP is a human-made carcinogen that contaminates 372 Known California drinking sources, langely in low income rural communities where faulty peshicides were sold. Please set the TLP drinking wath standard at 5 ppt (the returion limit) to В protect public health & allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Charles Bultman (Charles Bultman)

Berkeley, CA 94782

Feb 1, 2017

State Water Resources Board 1001 I Street Sacramento, CA 95812-2815

Dear Members of the Board:

Please set the TCP drinking water standard at 5ppt (the detection limit) to protect public health and all water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

9F

В

123 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources especially in low-income rural communities where faulty pesticides are sold.

Respectfully,

Esmeralda Marquez 657 Poirier Street Oakland, CA 94609

98 Members of the board Deur 12,3 is a man-made carcinogen that contamingtes 372 Known California drinking water Jorces, largely in low in come rutal communicties were fallity pesticides were sold. 1,2,3 that Pleas set the PCP. drinking worker standared at 5 PPT (the det ection Limit) to protect public health and allow water systems to recou water treatment costs from the companies that sold the contaminat Cd pesticides. Sincerely, Elliott.R. Frost Sq 37 Maccall St. Oakland CA. 94609

Fub 1,2017 Control Board State Water Resources 1001 I Street Securamento, CA 95812-2815 Dear Members of the Board, 1,2,3 TCP is a man made corcinogen that contoninetes 372 Known California driklen natur sources, largely in low income runal areas where faulty perticides were sold. Please set the TCP drinking water standard B at 5 ppt (the dotter limit) to protect public health and allow water systems to vecomp water theatment costs from the companies that sold the contaminated pesticides. Strucky man Mary Mc Canta 5916 Dover St. Oakland, C1 94609

Estate Nater Resources Control Board, Jan 30 Dear Members of the Board, 12.3 TCP is a man-made carcinoger that Contaminates 372 known California truchung water Sources dungely in low-income rural communities where failing pertructus were sold. Plense set a stendard!! Recommended is 5ppt to protect public health and allow B vater systems to recamp water treatment osts how comparises that sold the contaminated pesticides Sincerely Pachard 637 Alvanado St Sanfrancisco 9411.4

201 DECEMBER 29 2014 DEAR BOARD MEMBERS 1, 2, 3 TCP IS & MAN-MADE CARCINOGEN THAT CONTAMINATES 372 KNOWN CALIFORNIA DRINKING WATER SOURCES, LARGELY IN RURAL COMMUNITIES, WHERE FAULTY PESTICIDES ARE SOLD. PLEASE SET THE TOP DRINKING B WATER STANDARD AT SPPT ( THE DETECTION LIMIT). ESINCERELY, LIAM BERGFELT 1428 RICHMOND ST EL CENRITO CX 94530 Vian Bogfeff

Dec. 29,2014

Dear Members of the Board,

1,2,3 TCP is a man-made Carcinogen that Contaminates 372 California duinking water sources, Langely in low income vural Communities where faulty pesticides where faulty pesticides

Please set the TCP drinking Water standard at 5 ppt — the detection limit — to protect public health, and to allow water systems to recoup B water treatment costs from the Companies that sold the contaminated pesticider.

202

thank you for your consideration. Sincerety, Katherolugher Katherine Murphy 1428 Richmond St

EL CONVITO CA 94530

a k experces Control Board et 95812-2815 4/7/ Dear Menulon of the Board 1,2,3 TCP is a man-made carcinogen that contaminate 372 Known California annhug water sources, lagely in low manne rival communite where facility pesticides were sold: Reare set the TCP donky water standard at 5 pp- (the defection finit) to project public health and allow water system to record water Freatment Costs from the companies that cold the contaminated perford adwin d'huje 3 Sipth Deniel 9.4007

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204 4/4/17 Dear Members of the Board HIS time to ensure our water is safe frall to drink ! 123TCP is a man made carcinogen that contaminates 372 known of dunking water sources, largely mi rual communities where faulty pestrades were sold. Please set the TCP drinking water standard at 5ppt (the detection limit) to protect public health and allow water systems to recomp water treatment was from the companies that sold the contaminated pesticides. Best Regards, Ulla Joelu 50 Notre Dave Place Relmont, CA 94002

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MEMBORS OF THE BURCH

12.3 TCP IS A MAN-MADE CARCINOTEN THAT CONTRAMINATES 372 KNOWN CALIFORNIA DRINKULG WATER SOURCES, LARGELY IN LOW INCOME RURAL COMMUNITIES WHERE FAULTY PRETICIDES WARE SOLD.

PLEASE SET NOTE TOP PRIVEING WATER STANDARD AT 5 PPT (THE DETECTION UMIT) TO PROPERT PUBLIC HEALTH AND ALLOW WATER SYSTEMS TO RECOUP WATER TREATMENT COSTS FREM THE COMPANIES THAT SOLD THE CONTAMINATED PESTICIDES

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SWCERERY,

MARK WIEDER

1-25-17

Dear Members of the Board, 1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low. income rural communities where faulty pesticides were pold Please set the TCP drinking water standard at 5 ppt (The detection limit) to protect public health and allow water systems to recoup water treatment costs from the contaminated pesticides. Sincerely, Michaline fe Paule 1720 Virginia Berkely, CA 94703

B

April 3, 2017

Dear Chair Marcus and Members of the State Water Board,

No one should drink water laced with a carcinogen. That is why I support establishing a drinking water standard for 1,2,3 Trichloropropane (TCP) at the detection limit of 5 parts per trillion (ppt). Because of its cancer causing properties, the public health goal for TCP is 0.007 ppt-one of the lowest for a drinking water contaminant.

As you know, the state is required to establish drinking water standards as close to the public health goal as is economically and technically feasible. Given that for the vast majority of TCP cases, there are known responsible parties that the courts have indicated can and should pay for water treatment, and that the 5 ppt detection limit is well established as reliable, this health protective standard is feasible and appropriate.

В

A 5 ppt standard for TCP will protect untold numbers of Californians and is in line with the state's commitment to the human right to water. Please establish this regulation with all expediency.

Yours sincerely,

William Nystrom 813 Ruth Ave. Belmont, CA 94002 650 654-5885 415 533-2613 mobile

April 3, 2017

Dear Members of the Board:

1, 2, 3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

· Sincerely,

Stuart G. Campbell 817 Ruth Avenue, Belmont, CA 94002

J. Selkow. 1327 Welkin St Dakland, CA. 94602. 1/24./17 - Den Mensers of he Bond .-I his concerned about 1,2,3 TCP in Ow water & he wake in Californi ruml Communities. Plene Set M TCP water Studie to Sppt to protect public health. I should be the B respinsibility of the polluters to pay the The cost of Clean-up. Think you for protecting bur precious resources. Sunceres) Multur,

01.23.17

plar members of the Board,

I research different groundnater V contaminants (such as trichburchhene and arsenic) and how to clean our drinning heater supply. Ryulating emerging nater contaminants is integral for human and. natural health & safety.

1, 2, 3 TCP is a manmade carcingen that contaminates 372 known calibration drinking weter sources, largely in low income areas where faulty pesticides were sold.

Please norchernand to set the TCP mats. Level B to 5 parts per trillion (ppt) which is the detection limit. Doing so will protect public and instronmental health and will allow hater systems to near treatment wats from the companies that sold the contaminated posticides.

Thank you for your wonsideration!

rily look ing lo

Binely (a 94703

2536 Grant St

I I ST. RAMENTO, CA 95B12-2815

AD MEMBERS OF THE BOARD.

1.2.3 TCP IS A MAN-MADE CARCINOGEN THAT NTAMINATES 372, KNOWN CALIFORNIA DAINKING TER GOURCES, MOSTLY IN LOW INCOME RUPAL MMUNITIES WHERE FAULTY RESTICIDES WERE SOLD.

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2-27.17

EASE SET THE TCP PRINKING WATER STANDARD T 5 PPT (THEDETECTEON LIMIT) TO PROTECT B IBUC HEALTH AND ALLOW WATER SISTEMS TO COUP WATER TREATMENT COSTS FROM THE OMPANIES THAT SOLD THE GONTAMENATED PESTICIDES!

SINCEREUY,

JASIF JAN THOMAS

408 C ST. SAN RAFAEL, CA

5 March 2017 Dear Members of the Board, 1,2,3 TCP is a man-made carcinogen that Contaminates 372 known California dvinking water Sources, largely in low income rural communities Where failty posticides were sold. Please set the TCP duriking water standard B at 5ppt (the detection limit) to protect public brealth and allow water systems to recarp water treatment costs from the companies that sold the contaminated postizides. Sincevely Ashiay Chu 1330 Cornell St Palo Alto, CA 94306

25 Jan 17 Den Members of the Board 12,3 TCP is a mon made carcinogen that controliptes 372 Known California dimking, water sources, largely in low income rural communities where faulty pesticides were sold. Please set the TCT drinking water standard at 5 ppt (detection) to protect public health and allow water systems to recoup water р treatment costs from the companies that sold the contaminated perficides Smarch Pobert Fame 1629 hincola street Bukeley 97/03.

Dear Members of the Board 1,2,3 TCP is a mammade carcinogeran that contaminates 372 known California drinkily wather courses, largeley in low income rural communities where faulty pesticides were sold.

Please set the TCP trinking water standard Octor at 5ppt (the detection limit) to protect public health and allow water systems to recomp water theadment costs from the companies that sold contaminated pesticides.

B

Sincerely, Jessie Octtinger 1321 Lincolh St. Berkeley CA 94702

Jan 25. 2017

State Water Resources Control Boond 1001 1 streat

Sacromento C& 95817 -2815

Pan Member of The Borad: 1, 2, 3, TCP is a mon-made carcinogen that contaminents 3 372 blow california drinking water Sources, largely in Low in care and rural communities Where faulty Pesticider were sold Where faulty Pesticider were sold B plasse set the TCP drinking water standards at B Plasse set the TCP drinking water standards at B Sopt (the detect in limit) to protect public health 5 ppt (the detect in limit) to protect public health and allow water systems to become water treatmat Costs from the companies that sole the contaminator Pesticides.

Siv cereby. William C. Moore 16.15. Me bee Ave Benheley Ca 94703

Let

	216
	STATE WATER RESOURCES BOATED 1/25/2013
	SACRAMENTO CA. 95812
	DEPR BOARD MEMBERS.
	FOR 1,2,3 TZP. PLEASE CONSIDER SETTING THE STATIONED
	WATER COMPANYES TO BELOW WATER TREATMENT COSTS
· · · · · · · · · · · · · · · · · · ·	PESTICIDES CONTAINING 1,2,3 TCP.
	SINCEPEUL, TONY PHULIPS
	Ibis EDITH St. BORKELEY, CA 9478
Na disanta da mana a tagan da di kinisi Al-Cara ang ang bagi an	

12/27/16. Dear Member of the Board: 1,2.3 TCP is a man-made carcinogien that contaminates 372 known California drinking water sources, largely in low income rural communities where tauty pesticides were sold. Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recomp water treatment costs from the companies that sold the contaminated pesticides,

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Since-elx, Amber UN 1314 Noble Court El Cettrito CA 94530

3/23/17 he Board Dear e 2 372 TUR -We Since 11er 276 Sycamore Ave, Hill Va.

March 2<sup>nd</sup> 2017

Dear Members of the board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water resources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

В

Sincerely Scotl Hamilton, PhD

18 Grove In. San Anselmo, CA 94960



March 6, 2017

State Water Resources Control Board 1001 | Street Sacramento, CA 95812-2815

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely

Patrick Lin 2349 Cornell St Palo Alto, CA 94306 MARCH 3,2017

DEAR MEMBERS of the BOARD,

123 TEP IS > KNOWN EDRINGGEN PRESENTLY CONTAINING 372 (OLMORE!) CALIFORNIA DRINKING WATER SOURCES. THIS PREDOTIMATELY AFFECTS LOVEINCOME & RURAL COMMUNITIES W THE SHADON & REGIONS WHELE FAULTY PESTICIDES WELE SOLD.

PLEASE SET TOP DRIVIKING WATER STANDARDS AT B <u>SPPT</u> TO PROTECT RUBLIC MEDICITY & ALLOW WATER SYSTEMS TO RECOUP WATER TREATMENT COSTS FROM THE BAD-ACTOR COMPANIES THAT SOLD GUITAMWATED PESTICIDES.

SMICERELY POUDJ. EUANS

- EVANS // STONE -2345 DARTMOUTH ST PALO ALTO, CA 94306

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4/12/17

Dear Member of the Board

1,2,3 TCP is a human-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides are sold.

Please set theTCP drinking water standard at 5ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

LUANN A CF 2331 Coronet Blvd Belmont, CA 94002 4/12/17

Dear Member of the Board

1,2,3 TCP is a human-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides are sold.

Please set theTCP drinking water standard at 5ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Sincerely,

Mig Colore

Mia Cavison-Aké 2331 Coronet Blvd Belmont, CA 94002
State Water Resources Control Board 1001 | Street Sacramento, CA 95812-2815

01/17/2017

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

В

Sincerely,

Sarah Custer 141 Nevada St San Fancisco, CA 94110

### 1-17-2017

DEAR BOARD MEMBERS

TCP IS A TERRIBLE CARCINOGEN THAT CONTAMINATES 372 KNOWN CALIFORNIA DRINKING WATER SOURCES - LARGELY APPECTING POUR & RUNAL COMMUNITIES

PLEASE SET THE TCP DRIVKING WATER B STANDARD TO SPPT!

PROTECT THE RUBLICS HEALTH! AND ALLOW WATER SYSTEMS TO RECOVE TREAT MENT COSTS FROM THE COMPANIES THAT SULD CONTAMINATED PESTICIDES

- RICHARD LEEDS 335 PRENITISS ST SF, CA GYIID

#### 25 January, 2017

Dear Members of the State Water Resources Control Board:

There are currently many families living within the area where the chemical 1,2,3,TCP, a man made carcinogen, is contaminating the drinking water of 372 known California drinking water sources. Most of these are in low income rural communities where faulty pesticides are sold.

Please use your position on the board to set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Sincerely,

Rick Kleine 1442 Delaware St. Berkeley, CA 94702

January 17, 2017

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

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Please set the TCP drinking water standard at 5 ppt to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

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Sincerely,

Emily Jones 224 Moultrie Street SF, CA 94110

State late Resources Curtol Buad 1001 I Street Sacramento, CA 95812 16-Jan-17 Dear Members of the board, 1,2,3 TCP is a moan made carcinogen that antamsnates 372 known California drinky waber succes, largely in low-incime rural communities Please get the TCP drunking water standend ap 5 ppt & protect public health and allow water system to recomp water Fredelment Easts from the companies that Sild the contaminated pesticide Sements Soul Ken 15 Anderen St Gellia SB GA

230 January 17, 2017 Dear members of the Board, 1, 2, 3 TCP is a man made carcenogen Atat Contaninates 372 known Caliprica driving water sources, largely in low income rural communitie where faulty pesticides were sold. Please set the TCP driving water standard В at 5 ppt (the detection limit) to protect perblic health ad allow water systems to recomp water treatment costs from the companies that sold the costanimated pesticides. Sincerely Kon Cox

330 Monthe St. SF. CA 94110

Jel 21,2017

plarmembers of the board, 1,2,3 TCP is a man-made concinoper that contaminates 372 known ca drinking water sources, dougly in low income rural communities where fauly pesticides were sold. Please set the TCP dinking water Stol. at 5ppt (the detection limit) to protect public chealth and allow water septens to recomp water treatment costs from companies that solate ypesticide.

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Sincely, loudi mai 1907 Bourdons St. Reve, ca 94061

January 17, 2017 Dear Members of the Board, 1,2,3 TCP is a man-made cancinogen that Contaminates 372 known California drinking water sources, largely in low-mome rural communities where faulty pesticides were sold. Please set the TCP drinking water standard at .B 5 ppt (the detection limit) to protect public health and allow water treatment costs from the to be recorped from the companies that Sold the contaminated pesticides. Sincerily, Steven Worley 67 Anderson St. San Francisco, CA 94110

2017-01-17 Dear Members of the Board: 1,2,3 TCP is a manimade careinogen that contaminator 372 Known California drinking water sources, longely in low income rund communities where faulty pesticides were sold. Please set the TCP dividing water standard at Sppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies theory sold the contaminated posticides. Sincerely, B Sincerely, Mark Fillmone 264 Moulture Street

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1/11/17 Dear Members of the Board, 1, 2, 3 TCP is a man-made carcinogen that staminates 372 known California drinking water sources, rgely in low-income, rural areas where faulty pesticides vere sold. Please set the TCP drinking water standard at B the detection limit of 5 ppt to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated. pesticicles.

Sincerely, Jelle Griffing 103 Copetown Z. Mameda, CH 94502

12/30/14 Dur Member of The Board: 1,2,3 TCP is a non-made Careinofon That contaminates 372 Known Calif. drinking water Sources, largely in law income purch communities where faulty pesticides were polk. Please pet the TCP drinking water plandard at B Sppt to protect public hearth and allow water systems to Recomp works treatment costs from the companica that pold the containing pasticities. Amerily hit Jhrsp 1216 Versailles Ave. Alemeta, Calif. 945 94501

12/30/14 Dur Member of The Board: 1, 1, 3 TCP is a mon-mode Correspon That contaminates 372 Known Calif. drinking water Sources, largely in law income punch communities where fantty pesticides were polk. Please pet the TCP drinking water pt and and at B Sppt to protect public hearth and allow water systers to Recomp wats treatment costs from the companies that pold the contaminated pasticities.

Amendy, Deg Man 1216 VUSailles Ave, Alameda. (Agyso)

TO: STATE WATER RESources Control Board

2/23/2017-

Dear Members of the Board,

1,2,3 TCP 15 a Man-made carcinogen that Contaminates 372 Known California drinking. Water Sources, largely in low income rural communities where faulty pesticides were sold.

237

please set the TCP drinking water standard at B 5 ppt (the detection limit) to protect public health and allow water systems to recouplinater treatment Costs from the companies that sold the contaminated pesticides.

Sincerely,

Noël E Olson Moll C. Ol 593 Tamarack M San Ra FAZ/ CA 94903

February 27, 2017

## Dear members of the board,

1,2,3 TCP is a man-made carcinogen float contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at B 5ppt (the detection limit) to protect public health and allow watersystems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Sean Mooney 3 Welch St / San Rafael, CA 94901

468 Prentoss st. St Gar 94118 Jone Chu

239

1/17/17 Afte Water Resources Control 1001 1 Street Sacramento, GA 95812-2815

Dear members gythe Board 1,2,3. TCP to a man made carcinogen that Cortaminates 372 Known California durking water sources, largely in low priore unal communities where faulty posticides were sod.

Please out the TCP diviting water standard at 5 Pot (the detection limit) to protect public health and allow water pystemes to that sold the contaminated pesticides.

Strienly ,

Joyuchn 468 Protins st. ST-CA. 94110

#### January 18, 2017

Dear Members of the Board:

I ask that you set the 1,2,3 TCP limit on drinking water at 5 parts per trillion max to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

В

#### Sincerely, Ted Barmus 40698 Slayton Street Fremont, CA 94539

late 12-17-2016 Door Members of the Board: 1,2.3 TCP is a main-made carcinogen that containates 372 known California drinking water sources latery Please set th TCP drinking water stemland at Sppt (the detection limit) the prostect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Dick Lin

1314 Noble Ct. El Cezzito, CA 94530

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December 12, 2016

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 Known California drinking water sources, largely in lowincome rural communities where faulty perforded were sold.

Please set the TCP drinking water standard at 5ppt (the detection limit) to protect public health and allow water systems to recoup water freatment costs from the companies that sold the contaminated pesticides.

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Incenall (546 Websler St. 1/ml #130)

# Date 1/25/16 Dev members of the board 1,2,3 TCP is a man made carcinogen that contaminates 372 known california drinking water sources largely in low in range rural communities where fully faulty pesticides are sold. please set the to protect public heath and allow water B systems to recoup maked meaturent costs from the comparies that sold the contanihated pesticides

Sincerely Dosie Bultman 1412 hearst ave Berkeley

CA 94702

1-25-17 Dear members of the Board ease set the TCP drinking Water standard at 5 ppt detection limit) to protect publ water systems and and to recoup water treatment conform the companies that the contaminated pesticides. Cos 1,2,3 TCP is a man-made carcinogen that contaminates 372 Known Calibornia drinking water sources, largely in low income renal communities when Unities Where faulty pesticides were sold. Sincerely rect earst Ave eley, C

242

### 1/8/2017

Dear Members of the Board: 1,2,3 TCP is a mon-made corcinogen thed contaminales 372 known California dranneng walet sources. It porticularly concerning because these excattors are langely in low income roral communities where faulty pesticides were sold.

Please set the TCP drinking wall standard. at 5ppt (the detection limit) to protect. peublic health and allow walkt sepsterns to recoup water treatment costs from the companies that sold the Contominated pesticides.

B

Sencevely, A COD FALLE & PARSONS 517 Georgia Ave. Polo AHb, CA 94306.

March 15, 2017

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Sincerely,

Steven Williams Sinton

21 Somerset Place Palo Alto, California

マロン 4175 menuch Per-Palo ally CA 94306 Josuel 7/20/7

411

Near mimbus of the Brand, 1,2,3 TCP is a man-mule carcinogen that Conteminates 372 known California drinking water sources, largely in low income nurit communities where Aulty pesticules were sold. Please set the TCP chinking writer standard at 5 ppt (The detection time) to protect public health and allow water systems to record water Treatment costs from the companies That sold The contamented pestudes.

Afeldon Lewis (rabbi) 4175 menuele ave. Filo (Ille, CA. 94306

В

896 La Para Avenue Palo Alto, California 94306

March 7, 2017

State Water Resources Board 1001 I Street Sacramento, CA 95812-28115

Dear Board Members:

1,2,3-TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, primarily in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

William E. Benitz

31 January 2017

249

Dear Members of the Board:

1, 2, 3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Michael Lanza 1545 Trestle Glen Rd Oaleland, MA 94610

31 January 2017

Dear Members of the Board:

1, 2, 3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Sebastian Desid, Dalcland, CA 9460

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State Water Resources Cartrol Board 1001 I Street Sacramonto, CA 95812 - 2815 Feb 13, 2017 Dear Members of the Board, 1237cp is a manmade careeriagen that contaming 372 known California donnling woder sources largely is les income rural communities where faulty pesticides were Sold. Please set the TCP dombing water standard to 5 PPT, the detection limit, to probed proble headth B and allow water systems to needy water to extendent Costs from the companies that sold the onterination Sincerely) Miniam Baskin 1485 15th Ave San Francisco CA 94122

25C

February 7, 2017

B

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low-income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely 120

Elizabeth V Dickinson 935 Hickory Way Fremont, CA 94536

252 1/12/17 Dear Member of The Board 1,2,3 TCP is a mon made Covcinogen that contaminates 372 known California drinking water sources, largely in low income rutal communities. where faulty pesticides were sold. Please set the TCP drinking water B standards @ 5 PPF (the detection limit) to protect public heath and allow water systems to recomp water treatment costs from the companies that sold the contaminated perficides

Sincerely Rueiri D'Ceallaugh 4355 39th Ave Oakland Ca 94619

January 4, 2017 Dear Members of the Board: 1,2,3 TCP is a man-made carcingen hat contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were solo he TCP drinking water Please Se B standard at Sppt (the detection limit) to protect public health and allow wate later systems treatment cos recoup Water Companies that sold the contaminated pesticides. Sincerely lorvall St Cemito, CA 94530

254 January 4, 2017 Dear Members of the Board: 1,23 XP is a man-made carcingon that contaminates 372 Frown Ca drinking water sources, largely in low income sural communities where paulty pesticides were sold. Please set the TCP brinking water standard at 5 ppt B the detection limit) to protect public health and allow vater systems to recorp water treatment costs from the companies that sold the contaminated pesticides Sincerely With Routh 817 Nowell St. El Cerrito, CA 94530 it.,

February 7, 2017

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low-income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Sincerely,

Cooper J. Smith 935 Hickory Way Fremont, CA 94536

256

B

February 7, 2017

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low-income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Steven J. Smith 935 Hickory Way Fremont, CA 94536

2517 Febrany 13, 2021e Members of fre board DOGN 1,2,3 TCP is a man-mede carrinogen that contaminates 372 known California drinking water sources; largely in low income wal communities Muse faithy pesticides were sold. Please Set prietCP drinking water Standard at sppt I due deetection limit ) to protect public health and allow water systemy to ve coup water treatment cost from the companies that sold the contaminational pesticide Sincenely, Jophin Miatti 16 Rochvidge Drive 94116 San trancisco CA

258 January 19, 2017 Forrest Brown 5802 Fer- St El Cercito, CAT 94530 State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815 Dear Members of The Board + the TEP drinking water standard - ppt (the diffection limit) to to recorp Water treatment costs from the companies that sold the contaminated pesticides. 123 TCP is a man-made parcinogen B that contaminates 372 known California drinking water sources, largely la low income cural communifies where faulty pesticides were sold Sincerely Forrest Bass

Pear Chair Félicia Mercus and Members of the Board,

Please set the 1,23 trichloropropane druking water B standard at 5 ppt (the detection limit) to protect public health and allow water systems to recomp water treatment costs from the companies that sold the contaminated pesticides.

Respectfully, Hilary Powell-Wright Kevin Wright and Norah Wright 2036 5th Ave San Rafael CA 94901

February 23, 2017

260

B

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Bryce K. 829 Del Ganado Rd.
26 State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815 February 2, 2017 Dean Members of the Board: 1,2,3 TCP is a man-made carcinogen that contaminates 372 known Californio drinking water sources, largely in low income rural communities where faulty pesticides were sold. Please set the TCP drinking water standard В at 5ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides Sincerely, Kristie Glatzo Oakland CA-

Jenuary 17, 2017 Dear member of the State Will Resources Control Board, 1,2,3 TCP is a man-made Carainagen that contaminators 372 known california drinicing wither sources, largely in low income rural communities share faulty particules were sold that Should be regulated by the Papt of Porticule Regulation In order to protect Californians and appecially children that rende in communities duple to knew writer sources, the TCP drinking writer Standard nuest be set to Sppt. The companies that see These contraministed posticions must also be held accountable and water systems must be allowed to recoup when treatment LOSID from them. As a Californian tempage that happiles pays my taxe with the underiteding Aby will be used to help fund the state water Resurces Contose Biard to protect our water supply. I use you to prioritize this impositive public hearth issue for the hearth and referry of our State's citizens. I have very family members that reside in the central valley so this a deeply portonal issue.

263

B

1/13/17 Dear Members of the Board, 1,2,3, TCP j5 a man-made carcinogen that contaminates 372 Known Galifornia aninKing water sources, langely in low income nural communities where faulty pestisides were sold. Please, set the TCP drinking water Standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the compa companies that sold the contaminated pesficides. R When word water people need to the to live is contaminated, it effects all quality of life. Sincerly Zay Jones 1129 Amador Avenue

263

264 1/11/17 1001 7 Det 55812-2815 2 71 year and ware - I want the grandiens frequency me to the grandiens frequency me to the grandiens frequency me to covery to -day on present forte las quel man have a contra Rome (, 2, 3 TCR mon B male ancient of con-Tamualos 372 Javan Colfmin drukij unan Romase - slogged! SIT TEPahalang Lala aland it ig git to prelid

 December 22,2016

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in lowincome nural communities where faulty pesticides were sold. 265

B

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Uffankje Keith A. Jantzen 1918 Emerson Street Palo Alto, CA 94301

266

Dacember 21,2016

Dea members of the Board: 1,2,3 TCP is a man - made carcinogen that containated 372 Known California drinking water sources, largely in low income reveal communities where faulty pesticides were sold. Please set the TGP trinking water В standad at 5 ppt (the detection limit) to protect public Realth adallow Water System to recoup water treatment costs from companies that sold the contaminated pesticites. Firedy assie Lope 475-38th Sty Oak (md, Caly 94609

1/20/17 Dear Members of The Board:

1,2,3, TCP is a man-made carcinogen that Contaminates 372 know California drinking water sources, largely in low income oural communities where faulty pasticiles ware Sold.

267

Please set The TCP drinking water Standard at 5 ppt (The detection limit) To protect public health and allow water sy stems to recoup water Treatment costs from The Companies That sold the contaminated Pesticides.

Sincerely, Charles Neifeld 4623 Benevides Ave Oaxland, CA. 94602

B

January 25, 2017

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at5ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

McKelligan Mich

1381 Barrows Road. Oakland, CA. 94610

269 12/23/16 Dear Members of the Board: 1, 2, 3 TCP is a maximade cascinger that Contaminates 372 Known California duinking Water Sousces, largely in low income Rural Communities where faulty pesticidas were Eold Please set the TCP drinking water Standard B Sppt (the detection thinks to protect allow deter Systems to recoup public health Water treatment cost from the comparies that sole Contaminated pesticides Hircosely ELIZAE AMIREZ 321 RAMONIA due Carits CA 94550

270 December 22, 2016 Dear Members of the Board: 1,2,3 TCP is a man-made carcinogen that contami-Nates 372 Known California drinking water Sources largely in low income rural communities where faulty pesticides were sold. Please set the TCF drinking water standard at • <u>B</u>\_ 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatments costs from the companies that sold the contaminated pesticides. Sincerely Collen Ahiple Colleen Shipler 219 Pomona Ave El Cerrito CA 94530

12/30/14 Dur Member of The Board: 1,2,3 TCP is a non-mode Correspond That contaminates 372 Known Colif. Jamking water Sources, largely in low income purch communities where inthe modulation when half fanitz pesticides ware poll. Sppt to protect public hearth and allow water pysters to Recoup wats treatment costs from the companica-

America , Gerald Buliosby 1216 Versailly ave. alameda, CA 9450/

12/30/14 Dur Member of The Board: 1,2,3 TCP is a man-made Carcinogen That contraminates 372 Known Carlif. drinking water Sources, largely in low income purch communities where funtig pesticides war polk. Please part the TOP drinking water parandard at B 5 ppt to protect public hearth and Min water systems to Recoup wats treatment Costs from the companies. That pold the contaminated pesticides.

Amerily, Marty Skeels 1216 Versaille Ave-Alemedri, Chip 94501

January 24, 2017 Mambers of The Baard: In largely low income rura communities where faulty pesticides were sold, 13,3 TCP, a man-made Carcenogen, contaminates 372 known California drinking water sources. Please set the TCP drinking water standard B at 5ggt (the detection first) to protect public Real th and allow water systems to recorp water treatment cerits from the companies that sold the contaminated perticides.

Sincerely, Derjanne Moreno 1462 Hangel Street, Oakland, CA

1/24/17 Dear member of the Board, 1,2,3TCP is a man-made carcin ogen that contaminaltes 372 Known California drinking water Sources, largely in Iow income rural communifiests where faulty pesticides were Sold. Please set the TCP drinking wolth B standard at 5ppt. (the Detection (mit)) to protect public hoolth and allow water systems to recoup water theatment costs from the companies that sold the contaminated posticion Sincevely Paul 7. Joanson. 1462 Hampel St Dald an of CA 9460 510.508-6085

Dear Members of the Board, Please, let TCP during water standard at 5 ppt (the detection Timet) to profect health and allow our water oystems to recoup water treatment, Coging from the companies that sold The confammated perfectedes 1,2,3 TCP is a manuale carcinege B I have carrier from long in such area's This chemical contaminates hundred of California nation somes. Rederly ~ duldien are at special moh and many areas are tou mame commente Do the RIGHT Thing Sucur Mary Loham 144 Andore 7-SF Ca 94110

Dear Members of the Board, Please limit 1,2,3 SPCRAHENTO CASS 5 parts per trillide APR 2017 PMSL Keep our water safe \* State Water Resources prevent cancer + nerve Control Board 1001 I St., 24th Floor damage From a concerned CA E (Sadramenta) Californian, 95814 Lynne Olsen 1936 Withem Dr. APR 1 4 2017 Woodhad, 95776 # pastcards for Amelite Hulling Internet Hulling Hulli

B

47

Dear Members of the Board,

Phease let TCP during water standard at 5 ppt (the detection mich to profect health and allow oninuater ayotims to recoup water treatment, Costs from the companies that sold The contaminated perfectedes

1,2,3 TCP is a manuale cancing I have carrier from long in such areas This chemical contaminates hundreds of California note sources. Rederly ~ duldien are at special rish and many areas are tou mome conneurites

R

Do the RIGHT Thing

Mary Isham 144 Anclone 7-SF Ca 94110

Sucint

STATE WATER RESOURCES CONTROL BOARD 1001 1 STREET SACRAMENTO, CA 95812

PLEASE SET THE DRINKING WATER STANDARD B FOR 1,2,3 TCP AT S ppt. THIS INSIDIOUS CHEMICAL HAS BEEN LINFED TO CANCER BY MANY STUDIES AND HAS BEEN IDENTIFIED AS A CONTAMINATE IN DRINKING WATER SOURCES THROUGHOUT THE STATE, WITH THE LARGEST IMPACT FALLING ON POOR AURAL COMMUNITIES THAT DO NOT HAVE THE RESOURCES TO FIGHT IT OR DEAL WITH THE RESULTING FALLOT. WE ARE CONTINUE ON YOU TO DO THE RIGHT THING!

278

1/23/2017

THANK YOU!

BRIAN DODD 1425 PARKER ST. BERKELEM, CA 94702 Brian Jall

317/2017 Stand, Gianni Pellizzari 123 TCP is a man-made carcinogen that Ontamintes 372 from alifonia drinking mbr souras, largely in low moone-wral " communifies where faulty perficides were cold. Please sty the TEP drinking water standard at B 5ppt (the detection limit) to protect public health and allow water systems to recorp water tratment Astron the companies standed the contaminated Reficides. Fincaral. D. L. Dender Chimalus hr Sincerely, Granni Rubado 98 chimalus dr

3/7/17

Dear Members of the Boowd; 1,2,3 TCP is a man-made covernogen that contanimater 372 known California drinking water sources, largely in low income commune where faulty poticides were sold.

Please set the TCP durinking water Standovel Att B Sppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely. MiTTouden 784 Josna Ave, Palo Hito, CA 94308





one World. One Chance.

Dear Members of the Board,

123 TCP is a man-made carcinogen that contamintes 372 Known alifonia drinking miter sources, largely in low moone-wral " communities where faulty pesticides were cold. Please st the TCP drinking water standard at B 5ppt (the detection (intit) to protect public health and allow water systems to recorp water treatment RStrform the companies that sold the contaminated Psticides. Sincerely Stacey. Kimball 698 chimalus br Sincerely, Stacey. Kimball 698 chimalus br Pala alla on adane

## 27 Jan 2017

Dear Members of the Board:

1,2,3 TCP is a man made corcinogen that contaminates 372 known California drinking water sources, largely in low incomercural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at Sppt (the detection limit) to protect public Treatth and allow water systems to recoup water treatment costs form from the companies that sold the contaminated pesticides.

B

Sincerely, Anne Carxer

2231 McKinley Ave Berkeley it 94703

## January 27, 2017

Dear Members of the Board:

1,2,3 TCP is 2 man-made carcinogen that contaminates 372 Known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

281

Please set the TCP drinking water standard at 5 ppt B (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pestecides.

Sincerely, Johanna Heine, age 12 2231 McKinley Ave Berkeley CA 94703

ps. save our water!

12/28/16

Dear Members of the Board,

1, 2, 3 TEP is a man-made organogen carcinogen that contaminate 372 knows California dinking water sources. These Noter sources are located in low income RURAL communities who don't have a vorice to fight back. This is unsucceptable. Please set the TCP duinking water standard as 5 ppt to protect public health and allow natur systems to recoup water treatment costs from the companies met sold the contamineted pesticider.

81

B

Regards, Oshani Gunasekara 1310 Nanellier street El Cerrito CA 1 94530

Dec 29, 2016

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

286

B

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Jesse Concepted

Jesse Greywolf 1405 Scott St El Cerrito CA 94530

31 January 2017

Dear Members of the Board:

1, 2, 3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Sincerely,

ely, Vanem Correce Oakland, CA 94610

State Water Resources Control Board 1001 I Street Sacromento, CA 95812-2815

February 15, 2017

Dear Members of the Board:

1, 2, 3 TCP is a mon-made carcinogen that Contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

288

R

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water costs treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Sara Mrsny 2043 Origon Avenue Redwood City, CA 94061

78c

2 9 2017

Dav Members of the Board: 1-2-3 TCP is a man-made carcinogen that contaminates 372 Known drinking water sources, largely in low income rural communities where faulty proticides were sold. Please set the TCP drinking water standard at Sppt B (theeletection limit) to protect public health and allow water systems to recoup water tradment costs from the companies that sold the contaminated perficides.

Sincerty DESOL

689 Santz Ray Ave Oazland, CA 94660

State Water Resources Control Board 1001 Street Sacramento CA 95812-215

2/9/17

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Sincerely,

**Eric Fieberling** 

1556 Trestle Glen Road Oakland CA 94610

## 2/10/17

Dear Memberof the Board's

I'm very concerned about the quality 25-fety of mater in our state. I bear 1,2,37CF is a carcinogen & is containing disting H20 in the Central Valley where putty central valley where posticides were sold.

Please set the TCP drinking waterstandard at 5 PPT & allow nator systems to vecomp treatment asts from the companies that sold the pesticides. Project our Water? !!!

29

B

Thank yon!

Succession grace for 2155 Ward St. berkely CA94705

31 January 2017

Dear Members of the Board:

1, 2, 3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Merattays (11 years old)

B

Please limit 1,2,3 TCP to 5 parts per trillion. Keep our weter safe. Prevent cancer and neve damage. G APR 1 7 2017 В **SWRCB EXECUTIVE** Skete Weeter Reporce Control Board 100 | I Street, 24/K FL Secremente, CH 95814 Muntean 90012

ի լիսիի կողերությունը կերերերինը կերերինը կերերինը է

292

## 25 January, 2017

Dear Members of the State Water Resources Control Board:

There are currently many families living within the area where the chemical 1,2,3,TCP, a man made carcinogen, is contaminating the drinking water of 372 known California drinking water sources. Most of these are in low income rural communities where faulty pesticides are sold.

Please use your position on the board to set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Sincerely, Hally Pline

Haley Kleine 1442 Delaware St. Berkeley, CA 94702

В

February 10, 2017

Dear Members of the Board:

You already know 1,2,3 TCP is a man-made carcinogen. It was a contaminant in the poisons used by agribusiness to combat various pests. I am sure you are also aware it is a contaminant in the drinking water at 372 known locations in the state of California. These locations are, for the most part, the drinking water sources for low income rural communities where the contaminated pesticides were sold and used.

We are asking you to set a drinking water standard of 5ppt (The current detection limit) for TCP, to protect public health. Setting this standard might also allow local water systems to recoup some of the treatment costs from the companies who sold the contaminated pesticides in the first place.

Sincerely

Clark

Michael Clark 2322 Russell St. Berkeley, CA, 94705 February 13, 2017 Dear Members of the Board

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Sincerely

Joe Lahiff & Lana Radosavljevic

1457 9<sup>th</sup> Ave

SF CA 94122
Jennary 13, 2017 10 the Members of the Board, 1,2,3 TCPSs a man-made carcinogen that contaminates 372 known California drunking water sources, mostly in low man community areas where faulty zesticides were sold. Please do the right thing and set the water standard at 5 ppt (the detection R limit) to protect public health and allow water systems to recorp water treatment costs from the companies that sold the contained contaminated pesticider. Make it your job to hold them accountable



January 11, 2017

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources. Primarily in low income rural communities where faulty pesticides were sold.

I urge you to set the TCP drinking water standard at 5ppt (the detection limit) to protect public health and allow water systems to to recoup and cover water treatment costs from those companies that sold the contaminated pesticides.

Thank you for you time and attention to this issue.

Best Regards,

"La Amadan

Lara Asmundson 11 Chilmark Lane Alameda, CA 94502

B

January 6, 2017

Dear Members of the Board:

1, 2, 3, TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

В

Please set the TCP drinking water standard at 5 PPT (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Cany White

Cary Milia 3530 South Court Palo Alto CA, 94306

#### Dear Members of the Board:

1,2,3 TCP is a man made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

**Clifford Stewart** 

419 Norvell St

El Cerrito, CA, 94530

Please set the TCP anheng water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoge water treatment cests from the companies that sold the contaminated pesticides.

. . . .

Sincerely, Carly Keller 4979 17th St San Francisco, CA 94177

Dear Members of the Board.

-

.

Water is our most precious natural resource. Every community, family, man, woman, and duild should have access to safe, clean drinking water in their homes, businesses, and Schools. We must keep dangerous durinicals out of our water III

7/20/17

1,2,3 TCP is a man-made carcinogen that contaninates 372 known CA writing water sources, largely in low income rival communities where faulty pesticides were sold.

# 302

2/27/17 Dear hembers of The Found,

1,2,3 TCP 10 a man-maile concerne for that contaminates 372 known California drenking water sources, langely in 100 income renal communities where faulty pietterdes were cord.

Please set the TCP lister B standard at 5 ppt (The detection limit) to protect public health & alter conter systems TZ recorp water Theatment costs from The longanice That social the intaminated pestisides.

Sincerely Uncan Mon 28 Repeat Are San Refael, CA 94901

# Feb 27, 2017

State Water Resources Control Board 1001 I street Sacramento, CA 95812-2815

Dear Members of the Board,

1.2.3 TCP 15 a man-made car cinogen that contains 372 Known California drinking water sources, largely in low income rural communities where failty posticides were sold.

Please set the TCP drinking water standard at B 5 ppt (the detection limit) to protect public health and allow water systems to recorp water treatment costs from the companies that sold The contaminated pesticides.

Sincerely, Veanne Ross 48 Martons Blvd. Gan Rafael, CA 94901



# 2/27/17

Den Members of the Board: 123 TCP is a man-mede carcinogen that contamendes 372 known Californie drinking water sources, largely in lowincome rural communities where faulty pesticides more sold.

Please set the TCP drinking water standard B at 5 ppt (the detection limit) to protect public health and allow water systems to recomp while treatment costs Jrom the conframes that of bl the contaminated peshcides. Sincerely, Elizabeth Rhodes. 19 Glen Are No 1 San Regard, CA

94901

305 / 2/24/2017-Dear Members of the Board: 1, 2, 3 TCP 15 & man-made carcinogen that contaminates 372 Known California drinking water sources, largely in low income hund communities where faultyperticides were fold. Reace pet the TCP druking water plandard at 5ppt (the Setection limit, to gooteet public health and allow water Reptems to know water treatment costs from the companies that sold the Contaminated presticides Sinculy Maria Filed 2 W. Serview Ave. Fin Rafael, OA 14901



From:

Arianne Schneider-Stocking 711 Bamboo Terrace San Rafael, CA 94903 To:

State water resources control board 1001 I St. Sacramento, CA 95812-2815

2/23/17

Dear members of the board,

**1,2,3-Trichloropropane** (TCP) is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural areas and communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health, and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

В

Sincerely, Arianne Schneider-Stocking

From:

Thomas Stocking 711 Bamboo Terrace San Rafael, CA 94903 To:

State water resources control board 1001 I St. Sacramento, CA 95812-2815

2/23/17

Dear members of the board,

**1,2,3-Trichloropropane** (TCP) is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural areas and communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health, and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

В

Sincerely,

Thomas Stocking

1065 Las Ovejas Ave San Rafael, CA 94903

State Water Resources Control Board 1001 | Street Sacramento, CA 95812-2815

Feb 23, 2017

Dear Members of the Board,

I am concerned about carcinogenic chemicals in our drinking water that affect the Public Health. 1,2,3 TCP is a man-made carcinogen that at this time contaminates numerous California drinking water sources. Due to farming practices this unfairly impacts low income, rural communities.

I want the drinking water standards for this chemical set to the detection limit, 5ptt, in order to protect all people and allow water systems to recoup water treatment costs from chemical companies who have sold these contaminated pesticides.

I look forward to your considered and swift action to make California drinking water safer for all.

Sincerely,

Julie Ansara 1065 Las Ovejas Ave San Rafael, CA 94903 B

March 31, 2017

State Water Resources Control Board 1001 I Street Sacramento, CA 95812

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

pbe Ellie Campbell

212 Carmel Ave Piedmont, CA 94611

DDL SWRCB - DWR 17APR 10 PM12:14 24 (00 Marle Zartan

В

April 7, 2017

State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

Dear Board Members,

I write to request that you set the drinking water standard for TCP at 5 ppt, which is the detection limit. 1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources. These sources are largely in low-income rural communities where faulty pesticides were sold.

Please reset the drinking water standard to protect public health and allow water systems to protect public health, and allow them to recoup water treatment costs from the companies that sold the contaminated pesticides.

Very truly yours,

Evangeline haash & Jeddeush

Evangeline Leash 2008 Belle Monti Avenue Belmont, CA 94002

February 3, 2017

Dear Members of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

B

Sincerely,

hustion Kenny

Christian Kearney 3943 Fruitvale Ave. Oakland CA 94602

1 17/17 pear numbers of the boardy 1,2,3 TCP is a man-made carcinogen that contaminates 372 Known Californiansdriating water sources, bright in low-income rura). communities where faulty pesticides were sold. please set the TCP drinking water standard at 5 ppt (the dection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated persticides. 5 inverely, Alexandra Pasfield 300 Mouther st. San Francisco, CA 94110



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ETHANKAPLAN

PHOTOGRAPHER

WWW.K2PLAMPHOTO.COH

March 2, 2017

State Water Recources Control Board 1001 | Street Sacramento, CA 95812-2815

Dear Members of the Board,

Please set the 1,2,3 TCP drinking water standard to to 5ppt to protect the public health of Californians. As the TCP problem affects hundreds of known drinking water sources, and is a byproduct of faulty pesticides, water systems should try to recoup costs from companies that sold the problem chemicals.

Thank You,

Ethan Kaplan

415-431-1123

### **Clifford Hunt**

B

220n Kelly Avenue Half Moon Bay, CA 94019 650.712.0167 clifford\_hunt@me.com

March 20, 2017

State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0100

Dear Members of the Board,

I'm writing to express my support for a drinking water standard for 1,2,3-TCP at 5 parts per trillion (ppt).

1,2,3-TCP is a man-made carcinogen that contains 372 known drinking water sources in California, largely in low income rural communities where faulty pesticides were sold.

A 5 ppt standard is necessary to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

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We must put public health first, that's why I support a 5 ppt standard.

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Sincerely, Clifford Hunt

## Leslie Klein Hunt

315

В

220n Kelly Avenue Half Moon Bay, CA 94019 650.712.0167 lesliekleinhunt@gmail.com

March 20, 2017

State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0100

Dear Members of the Board,

I'm writing to express my support for a drinking water standard for 1,2,3-TCP at 5 parts per trillion (ppt).

1,2,3-TCP is a man-made carcinogen that contains 372 known drinking water sources in California, largely in low income rural communities where faulty pesticides were sold.

A 5 ppt standard is necessary to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

We must put public health first, that's why I support a 5 ppt standard.

Sincerely, Leslie Klein Hunt,

51.6 State Water Resources Control Board 1001 1 Street Sacramento, CA 95812 12/27/16 Dear Members of the Board: 1,2,3 TCP is a man made carcinogen that contaminales 372 known California dinking water resources, largely in low income rural communities where faulty restricides were sold. Plance Set the TCP drinking water standard at Sppt (the detection limit) to protect dublic hearth and allow (the detection limit) to protect dublic hearth and allow Water systems to recove water treatment costs from the water systems to recove water treatment costs from the companies that sold the contaminated peshicides.

Vana & Kan Brudfield 1219 Norvell Street 21 amito, 07 94530 Sincerely 1

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March 9, 2017

Dear Members of the Board:

After getting updated on statewide environmental hazards by my local Clean Water Action representative, I am writing you to express my concern about 1,2,3 TCP levels that are currently contaminating drinking water sources in many rural and low income communities.

Please set the TCP drinking water standard at 5 ppt to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides

Sincerely,

Bryan Wilde 2700 Kipling Street Palo Alto, CA 94306

Buyar k. Wilde

318 V February 10,2017 Dear Members of the Board: 12,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources largely in low income mural communities where failty pesticides were sold. Please set the TCP drinking water standard B at 5 ppt (the detection limit) to profect B public health and allow water systems to recomp water treatment costs from the companies that sold the containated pesticides. Sincerely, Linelsey Stratton 2831 Ellsworth St. Berkeley, CA 94705

State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

January 13, 2017

Dear Members of the Board,

I understand that you are planning to meet in the near future regarding setting a maximum contaminant level (MCL) for the man-made chemical, 1,2,3-trichloropropane (1,2,3-TCP) in drinking water. I also understand that this contaminant, known to be a carcinogen, has been found in 372 sources of drinking water, often in agricultural communities where pesticides containing this chemical were used for decades.

As a citizen concerned with our environment and the public health of all of our communities I encourage you to establish the most protective standard possible for 1,2,3-TCP: an MCL equal to the recognized detection limit.

В

Sincerely,

atty-Brink

Patty Brink

1208 Walnut Street Berkeley, CA 94709 Wednesday, Januny 25, 2017

Dear Members of the Board,

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health (especially in low income rural communities) and allow B water systems to recoup water treatment costs from the companies that sold the conduminantal productions.

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Surverly,

Madeline King, Berkeley

State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

January 13, 2017

Dear Members of the Board,

I understand that you are planning to meet in the near future regarding setting a maximum contaminant level (MCL) for the man-made chemical, 1,2,3-trichloropropane (1,2,3-TCP) in drinking water. I also understand that this contaminant, known to be a carcinogen, has been found in 372 sources of drinking water, often in agricultural communities where pesticides containing this chemical were used for decades.

As a citizen concerned with our environment and the public health of all of our communities I encourage you to establish the most protective standard possible for 1,2,3-TCP: an MCL equal to the recognized detection limit.

Sincerely,

e Grumbur

Steve Crumley

1208 Walnut Street Berkeley, CA 94709

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B

Shawn Jones 3422 Jordan Rd Oakland, CA 94602 1/12/17

## State Water Resources Control Board 1001 I St Sacramento, CA 95812-2815

Dear Member of the Board:

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set TCP drinking water standards at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely, Shawn Jones row 3422 Jordan Rd Oakland, CA 94602

B

State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

February 28, 2017

Dear Board Members:

Please set the TCP drinking water standard at 5 ppt to protect public health. Also, allow water systems to recoup water treatment costs from the companies that sold contaminating pesticides.

As I'm sure you know, 1,2,3 TCP is a synthetic carcinogen found in pesticides that contaminate more than 300 California drinking water sources which are located in low income, rural communities where contaminated pesticides were sold.

B

Roger Lion 5608 Paradise Drive Corte Madera, CA 94925

State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

February 28, 2017

Dear Board Members:

Please reduce the drinking water standard for TCP (used in plastics manufacturing) to the lowest possible detectable level (5 ppt). This is a man-made carcinogen which unnecessarily continues to end up in our water. The effect of this and other contaminants that we ingest have a cumulatively more damaging impact on individuals and public health.

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Please also facilitate a means to allow local water systems to recoup water treatment costs caused by the companies that sold contaminating pesticides.

In particular, 1,2,3 TCP is found in pesticides that contaminate more than 300 California drinking water sources located in low income, rural communities where contaminated pesticides were sold, and ultimately affects everyone in the state. Thos communities should be protected.

Marlene Philley P. O. Box 4206 San Rafael, CA 94925

Lawrence M Carson 10 Laurel St. Mill Valley, CA 94941 325

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3/30/2017

Dear Member of the Board,

1,2,3, TCP is a man-made carcinogen that contaminates 372 know California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

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Lawrence M Carson 10 Laurel St. Mill Valley, CA 94941

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Lawrence M Carson 10 Laurel St. Mill Valley, CA 94941

3/30/2017

Dear Member of the Board,

1,2,3, TCP is a man-made carcinogen that contaminates 372 know California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

and.

Lawrence M Carson 10 Laurel St. Mill Valley, CA 94941

30 March 2017 Members of the Board

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The chemical 1,2,3 trichloropropane (TCP) exists at levels exceeding the CA notification level in our drinking water. Please approve a TCP drinking water standard of 5 ppt, our health is our most important asset.

Ralph Chappell Martinez, CA

Β

State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

March 23, 2017

Dear Members of the SWRCB,

I am writing to lend my support for regulating 1,2,3-Trichloropropane in our state's drinking water. Based on current evidence I am convinced that setting the limit to 0.000005 mg/L is appropriate and in the best interests of the public.

Β

Thank you for bringing this issue to consideration and allowing me to voice my opinion.

tiste Roger Paskett

43 Meadow Drive Mill Valley, CA 94941

4-7-17 Dear Members of the Board: 1,2,3 TCP is a man-made carcinogen that carcinogen that contaminates 372 known California drinking water sources, largely in low income ryral communities where Faulty pesticides were sold. Please set the TCP drinking water standard set the 10 at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the

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contaminated pesticides. Sincerelli

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Loren Hajela and Dang Caulder

January 20, 2017

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

#### Re: 1,2,3-Trichloropropane Maximum Contaminant Level

Dear Ms. Marcus, Ms. Spivy-Weber, Ms. Doduc, Mr. Moore, and Ms. D'Adamo:

I live in the San Joaquin Valley, where the economy is supported primarily by agriculture. I recently learned that detections of the unregulated carcinogenic pesticide byproduct 1,2,3-trichloropropane (1,2,3-TCP) have been found in several wells in my area, and that I may be drinking 1,2,3-TCP contaminated water.

1,2,3-TCP is a toxic chemical contaminating groundwater all over California, but it is disproportionately found in the San Joaquin Valley in small, rural communities like mine. In 1999, TCP was added to the list of chemicals known to the State of California to cause cancer, however, to this day, it remains unregulated and therefore untreated in hundreds of systems across the state.

I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant level ("MCL") of 5 parts per trillion.

Sincerely,

Irma Badillo

B

Name

Signature

Address

5543

320 236

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1ph/

Phone Number

January 7, 2017

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

#### Re: 1,2,3-Trichloropropane Maximum Contaminant Level

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I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant level ("MCL") of 5 parts per trillion.

Sincerely,

CavoleLava

Name Signature este Are, 3711 1605 W.Ce NERN

Address

35-4043

Phone Number

B

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#### 4 de mayo del 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

## Re: Meta del Nivel Máximo del Contaminante de 1,2,3-Trichloropropane

Estimados Sra. Marcus, Sra. Spivy-Weber, Sra. Doduc, Sr. Moore, and Sra. D'Adamo:

Yo vivo en el Valle de San Joaquín, donde la economía se apoya principalmente por la agricultura. Hace poco me enteré de detecciones de 1,2,3-tricloropropano (1,2,3 - TCP), en varios pozos de mi área. Este contaminante es un subproducto de pesticidas que causa cáncer y que no es regulado por el estado, y que puedo estar bebiendo agua contaminada con este contaminante.

1,2,3 - TCP es un producto químico tóxico contaminando en las aguas subterráneas en todo el estado de California, pero se encuentra en forma desproporcionadamente en el Valle de San Joaquín en las pequeñas comunidades rurales, como donde yo vivo. En 1999, el TCP se añadió a la lista de sustancias químicas como causantes de cáncer por el estado de California, sin embargo, hoy día, sigue siendo no regulado y por lo tanto sin tratamiento en cientos de sistemas comunitarios de agua en todo el estado.

Por estas razones, Yo le urjo a la Mesa de Control de Recursos Hídricos del Estado (SWRCB, por sus siglas en ingles) que actúe con rapidez para adoptar un nivel máximo de contaminante (MCL, por sus siglas en ingles) para 1,2,3 - TCP que sea lo más cercano técnicamente posible a la meta de Salud Pública de 0.7 ppt.

Firma

Sinceramente,

Nombre

1040 Austin CT

May 4, 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

## Re: 1,2,3-Trichloropropane Maximum Contaminant Level

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1,2,3-TCP is a toxic chemical contaminating groundwater all over California, but it is disproportionately found in the San Joaquin Valley in small, rural communities like mine. In 1999, TCP was added to the list of chemicals known to the State of California to cause cancer, however, to this day, it remains unregulated and therefore untreated in hundreds of systems across the state.

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I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant ("MCL") for 1,2,3-TCP as close to the Public Health Goal of 0.7 ppt as technically feasible.

Sincerely,

Roberto artica

Name

Signature

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Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant ("MCL") for 1,2,3-TCP as close to the Public Health Goal of 0.7 ppt as technically feasible.

Sincerely,

Pontora Maria

Signature

Hood St ARVIN CA 93203 464

Address

В

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

## Re: 1,2,3-Trichloropropane Maximum Contaminant Level

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1,2,3-TCP is a toxic chemical contaminating groundwater all over California, but it is disproportionately found in the San Joaquin Valley. In 1999, TCP was added to the list of chemicals known to the State of California to cause cancer, however, to this day, it remains unregulated and therefore untreated in hundreds of systems across the state.

I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant level ("MCL") of 5 parts per trillion.

Sincerely,

Name

Signature

B

Address

#### January 20, 2017

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

### Re: 1,2,3-Trichloropropane Maximum Contaminant Level

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Signature

I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant level ("MCL") of 5 parts per trillion.

Sincerely,

Β

Name

-1-----

Address

January 20, 2017

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

## Re: Meta del Nivel Máximo del Contaminante de 1,2,3-Trichloropropane

Estimados Sra. Marcus, Sra. Spivy-Weber, Sra. Doduc, Sr. Moore, and Sra. D'Adamo:

Yo vivo en el Valle de San Joaquín, donde la economía se apoya principalmente por la agricultura. Hace poco me enteré de detecciones de 1,2,3-tricloropropano (1,2,3 - TCP), en varios pozos de mi área. Este contaminante es un subproducto de pesticidas que causa cáncer y que no es regulado por el estado, y que puedo estar bebiendo agua contaminada con este contaminante.

1,2,3 - TCP es un producto químico tóxico contaminando en las aguas subterráneas en todo el estado de California, pero se encuentra en forma desproporcionadamente en el Valle de San Joaquín en las pequeñas comunidades rurales, como donde yo vivo. En 1999, el TCP se añadió a la lista de sustancias químicas como causantes de cáncer por el estado de California, sin embargo, hoy día, sigue siendo no regulado y por lo tanto sin tratamiento en cientos de sistemas comunitarios de agua en todo el estado.

Por estas razones, Yo le urjo a la Mesa de Control de Recursos Hídricos del Estado (SWRCB, por sus siglas en ingles) que rápidamente para adoptar el nivel máximo de contaminante (MCL, por sus siglas en ingles) que proteja la salud de 5 partes por trillón.

Sinceramente,

Matilde Hemera

to Nonnera

B

Nombre

Firma

10770 chico De Rey. Ca.

Domicilio

XP-24-3 S

Número de Teléfono

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

## Re: Meta del Nivel Máximo del Contaminante de 1,2,3-Trichloropropane

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Por estas razones, Yo le urjo a la Mesa de Control de Recursos Hídricos del Estado (SWRCB, por sus siglas en ingles) que actúe con rapidez para adoptar un nivel máximo de contaminante (MCL, por sus siglas en ingles) para 1,2,3 - TCP que sea lo más cercano técnicamente posible a la meta de Salud Pública de 0.7 ppt.

Sinceramente,

oberto Reyes

Firma

12010 R.R. DR Cutles Cy 93618

Domicilio

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

# Re: Meta del Nivel Máximo del Contaminante de 1,2,3-Trichloropropane

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Sinceramente

Firma

2610 Railroad

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

## Re: 1,2,3-Trichloropropane Maximum Contaminant Level

Dear Ms. Marcus, Ms. Spivy-Weber, Ms. Doduc, Mr. Moore, and Ms. D'Adamo:

I live in the San Joaquin Valley, where the economy is supported primarily by agriculture. I recently learned that detections of the unregulated carcinogenic pesticide byproduct 1,2,3-trichloropropane (1,2,3-TCP) have been found in several wells in my area, and that I may be drinking 1,2,3-TCP contaminated water.

340

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1,2,3-TCP is a toxic chemical contaminating groundwater all over California, but it is disproportionately found in the San Joaquin Valley in small, rural communities like mine. In 1999, TCP was added to the list of chemicals known to the State of California to cause cancer, however, to this day, it remains unregulated and therefore untreated in hundreds of systems across the state.

I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant ("MCL") for 1,2,3-TCP as close to the Public Health Goal of 0.7 ppt as technically feasible.

Sincerely,

and on a

Signature

VISalia 5172 305 DV

Address

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

ROSALINDA RIVERA

Signature

Visalia Car 93291 309 86 Ave

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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armin Trasello Laura

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4986 AVE 309 Visalia 93291 CA

Address

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Sincerely,

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Signature

30767 MAXKAM Phe Visulia Ca. 93291

Address

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sinceramente,

alvarcz Firma

Isalia (a. 9329) AVE

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Signature

ave 309 Visalia CA 93291

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Sincerely,

Signature

salia Ca.2

Β

February 2, 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

Avalos

Signature

4888 Ave 309 Visalia Ca 93291

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

Signature

N West St Visalia Ca 932° 814

Address

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

## Re: Meta del Nivel Máximo del Contaminante de 1,2,3-Trichloropropane

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Sinceramente,

Firma

12610 Robil Road DR.

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sinceramente,

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RECY Rail Road cutles rA.

Domicilio

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sinceramente,

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Firma

12604 Pail Poad cutler

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Firma

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OSANO Rodriguez Firma

Rail Poal willer 12604 CA.

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rialina S. Rodriguez

1260 4 Railroad Dr. Entley, Ca. 93615 Interior

Domicilio

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant ("MCL") for 1,2,3-TCP as close to the Public Health Goal of 0.7 ppt as technically feasible.

Sincerely,

VOIN ?

Signature

there

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sinceramente.

Firma

VECOLO R.R.

January 20, 2017

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant level ("MCL") of 5 parts per trillion.

Sincerely,

Azallea

Β

Name

Signature

Ca. 10774 Chico Res

Address

38-28-39

January 20, 2017

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

arlos Anas

Name

Signature 93616

Address

432-6479 1.61

665

Phone Number

R

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

# Re: 1,2,3-Trichloropropane Maximum Contaminant Level

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I live in the San Joaquin Valley, where the economy is supported primarily by agriculture. I recently learned that detections of the unregulated carcinogenic pesticide byproduct 1,2,3trichloropropane (1,2,3-TCP) have been found in several wells in my area, and that I may be drinking 1,2,3-TCP contaminated water.

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I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant level ("MCL") of 5 parts per trillion.

Sincerely,

Name

Signature 372

Address

559-226-6010

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Name Signature Address

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Sincerely,

BOB 41 Joyce

Signature

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Name

COUT LARE DR. SANLE

Address

787-228 559

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

Name

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R

Signature

Address

Phone Number 202-530-9802

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Name

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Address

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Sincerely,

TAMES RODGERS

Signature

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B

Name

5138 E. ASHLAN AVE #125

Address

480-204-0492 (CEL

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Name 2531 & Leiter

Mum J. Bar

365

Signature

Address

Phone Number 1 70 -7576

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Sincerely,

SARAH TAYLOR

Sarah Taylor

Name

Signature

732 E. CLINTON FRESNO

1738 222

Phone Number

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

К

Name

Signature

93720 Address FRESNO,

436-8338
Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

Robert B. How RUBERT B. STOUL

Name

Signature

B

ARESNO, CA 9371

W. MORAGA RD. 1329

Address

431-7488 55

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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B

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Name gnature lemon 5686 N. Address 415-748-189=

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

Conan Marcha

PONON Marsha

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Name

Signature

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Address

Frenco 93 711

DONELADO

59-447-0753

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Sincerely,

BILLIE MACDOUGALL Bellin Mac Destegall

Name

Signature

#125\_ 2520 N. Chestrut and. Paramo 93320

Address

559-900-7143

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

utuer BYDIOM

Name

Signature

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TRICIA Drown

BOX 344 CLOVIS, CA 93613 Phone Number (559) 252-9551

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

Javier sous

Signature

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Sincerely,

Balodillo

Signature

Peace St. Arvin CA. 93203 505

### 2 de febrero del 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

# Re: Meta del Nivel Máximo del Contaminante de 1,2,3-Trichloropropane

Estimados Sra. Marcus, Sra. Spivy-Weber, Sra. Doduc, Sr. Moore, and Sra. D'Adamo:

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Sinceramente,

Domicilio

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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R

Sincerely,

Signature

CA. 43203 VIN

March 23, 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

ROBERTO GARCIA

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Name

Signature

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Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Anum. CA UNA

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Sincerely,

ESTELA ESCOT

Hone S. K

R

Name

Signature

1420 La Lila ave Arus

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R

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Signature

Walker St Arvin (A 588

### 23 de marzo del 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sinceramente,

14 MARTINE Nombre 914 Wemli Ct Anin na

Domicilio

### March 23, 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

### Re: 1,2,3-Trichloropropane Maximum Contaminant Level

Dear Ms. Marcus, Ms. Spivy-Weber, Ms. Doduc, Mr. Moore, and Ms. D'Adamo:

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Sincerely,

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### 2 de febrero del 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

## Re: Meta del Nivel Máximo del Contaminante de 1,2,3-Trichloropropane

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Elearar Gunzalez

Firma

140 Laurel Ave Arvin

Domicilio

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Essen Houer are Bakersfuld CA93309. 3633

Address

#### 23 de marzo del 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Maria Gloria Olea Monia Sloja (

Nombre

Firma

3633 EISENHOWER AUE Ballersfield CH

Domicilio

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OFMIKISCO PEREZ D.

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NEWTON ST Arvin CA 250- 93203

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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1912 Souht A St Arvin

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Sincerely,

Ana Delia Duran

Signature

316 North A st. Arvin CA 9320

#### 2 de febrero del 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

## Re: Meta del Nivel Máximo del Contaminante de 1,2,3-Trichloropropane

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Sinceramente,

Domicilio

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Edwin Soviano Ramirez

Signature

619 Arvin 9370 CA CVII

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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BEAR MINAPT. E ARVINCA 93203

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Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Educado Lucas olmenares

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Chayal IF 1559

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Rita Vargas

Signature

Laurel Ave, Arvin CA. 93203 383

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

### Re: 1,2,3-Trichloropropane Maximum Contaminant Level

Dear Ms. Marcus, Ms. Spivy-Weber, Ms. Doduc, Mr. Moore, and Ms. D'Adamo:

I live in the San Joaquin Valley, where the economy is supported primarily by agriculture. I recently learned that detections of the unregulated carcinogenic pesticide byproduct 1,2,3-trichloropropane (1,2,3-TCP) have been found in several wells in my area, and that I may be drinking 1,2,3-TCP contaminated water.

1,2,3-TCP is a toxic chemical contaminating groundwater all over California, but it is disproportionately found in the San Joaquin Valley in small, rural communities like mine. In 1999, TCP was added to the list of chemicals known to the State of California to cause cancer, however, to this day, it remains unregulated and therefore untreated in hundreds of systems across the state.

I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant ("MCL") for 1,2,3-TCP as close to the Public Health Goal of 0.7 ppt as technically feasible.

В

Sincerely,

Address

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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2008 Arvin << +
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Por estas razones, Yo le urjo a la Mesa de Control de Recursos Hídricos del Estado (SWRCB, por sus siglas en ingles) que actúe con rapidez para adoptar un nivel máximo de contaminante (MCL, por sus siglas en ingles) para 1,2,3 - TCP que sea lo más cercano técnicamente posible a la meta de Salud Pública de 0.7 ppt.

B

Sinceramente,

larene Firma Walnut-93203

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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1400 HOOD ST APT 68 ANIN CA 93203,

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Sonchez. lu.s Firma

ArVin 92203 Walnut DR

Domicilio

В

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Erasto Ferreira

Signature

40 Austin Court

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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12600 Beng road Edison Address Bakersfield C.M. 93307 (661) 5578952

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Elona Susi

Firma

509 PEACE ST ARVIN. CA 938

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Firma

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Signature

nrin Ct St

March 23, 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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DAVPO DE

В

February 2, 2016

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1515 Bear Mtn. BLVD Arvin.CA 93203 AP+

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1400 Hood st #= 59 Arvin Ca 93202

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Yo vivo en el Valle de San Joaquín, donde la economía se apoya principalmente por la agricultura. Hace poco me enteré de detecciones de 1,2,3-tricloropropano (1,2,3 - TCP), en varios pozos de mi área. Este contaminante es un subproducto de pesticidas que causa cáncer y que no es regulado por el estado, y que puedo estar bebiendo agua contaminada con este contaminante.

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К

Sinceramente,

Nombre

Firma

Domicilio

May 4, 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

# Re: 1,2,3-Trichloropropane Maximum Contaminant Level

Dear Ms. Marcus, Ms. Spivy-Weber, Ms. Doduc, Mr. Moore, and Ms. D'Adamo:

I live in the San Joaquin Valley, where the economy is supported primarily by agriculture. I recently learned that detections of the unregulated carcinogenic pesticide byproduct 1,2,3-trichloropropane (1,2,3-TCP) have been found in several wells in my area, and that I may be drinking 1,2,3-TCP contaminated water.

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I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant ("MCL") for 1,2,3-TCP as close to the Public Health Goal of 0.7 ppt as technically feasible.

Sincerely,

ay la Condenas

6207 Animas St BED CH 93212

Signature

Name

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Address



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Firma

Sinceramente,

Elizabeth Martinez

В

Nombre

Stockton Ane Annin, Ca. 9320 8104

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MAISOBEL Ramines

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Nombre

Firma

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Domicilio

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4 de mayo del 2016

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Nombre

Firma

Domicilio

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<sup>.</sup>Nombre

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Sinceramente,

van Cardena

Geran

Nombre

Firma

Col Ko,

· Domicilio

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Sinceramente,

Gunzslee Ohm

Nombre

Firma

Schippy ST

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Teresa Chavolla

Nombre Firma OB Valasco ST Arvin 62 93203

Domicilio

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Nombre

Firma

1028 Mernli CA.

May 4, 2016

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Sincerely,

Maleo Garcia

Name

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Signatúre

Charles 517 54 С.А. 93203 Acvin

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Nombre

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CA. 93203 Abruin

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I live in the San Joaquin Valley, where the economy is supported primarily by agriculture. I recently learned that detections of the unregulated carcinogenic pesticide byproduct 1,2,3-trichloropropane (1,2,3-TCP) have been found in several wells in my area, and that I may be drinking 1,2,3-TCP contaminated water.

1,2,3-TCP is a toxic chemical contaminating groundwater all over California, but it is disproportionately found in the San Joaquin Valley in small, rural communities like mine. In 1999, TCP was added to the list of chemicals known to the State of California to cause cancer, however, to this day, it remains unregulated and therefore untreated in hundreds of systems across the state.

I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant ("MCL") for 1,2,3-TCP as close to the Public Health Goal of 0.7 ppt as technically feasible.

Sincerely,

Name

Signature

haples

Address

B

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

Wana au

Signature

3 DG 5033. AVE
#### 2 de febrero del 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

#### Re: Meta del Nivel Máximo del Contaminante de 1,2,3-Trichloropropane

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Por estas razones, Yo le urjo a la Mesa de Control de Recursos Hídricos del Estado (SWRCB, por sus siglas en ingles) que actúe con rapidez para adoptar un nivel máximo de contaminante (MCL, por sus siglas en ingles) para 1,2,3 - TCP que sea lo más cercano técnicamente posible a la meta de Salud Pública de 0.7 ppt.

К

Sinceramente,

Saul Reys

Firma

2615Kully Ja

4 de mayo del 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sinceramente,

Nombre R. 1

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Firma

#### 4 de mayo del 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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В

Sinceramente,

Karina vazquez	Karina Vazquez
Nombre	Firma
308 shill st arun	Ca 937.03

February 2, 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

## Re: 1,2,3-Trichloropropane Maximum Contaminant Level

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I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant ("MCL") for 1,2,3-TCP as close to the Public Health Goal of 0.7 ppt as technically feasible.

К

Sincerely,

indra Horcia

Signature

POB BOX 3081 POPLAS. CA 13258 Address 19081 AVE 148 POPLAS

## 2 de febrero del 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sirreevamente,		
1527 1/ Plasson AV. TU Jave	CA	

Domicilio

February 2, 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

HAYDEE TRUNILLO

Signature

309 VISA/11CA

Address

#### 2 de febrero del 2016

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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I urge the State Water Resources Control Board to act quickly to adopt the most healthprotective maximum contaminant level ("MCL") of 5 parts per trillion.

Sincerely,

Paniel Servano

R

Name

Signature

3710 ANNA ST., FRESNO, CA (0337)N.

Address

559.259.5470

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

shev <u>Kaymond</u> F. Cusher Signature <u>'ian Ave, Fresno CA 93704-1549</u> Ensher Raymond

R

Name

Address

139-8140

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Name

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Address

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

Willie Lopez

R

Name

Signature

93616 4672

Address

970.3164

# 451/

Public Comment 1,2,3- TCP Deadline: 4/21/17 by 5pm

4-19-17 SWRCB Clerk

B

January 7, 2017

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

Name

Signature 9370 6 resnd

Address

559.213.4914

Felicia Marcus, Chair Frances Spivy-Weber, Vice Chair Tam M. Doduc, Member Steven Moore, Member Dorene D'Adamo, Member State Water Resources Control Board P.O.Box 100 Sacramento, CA 95812-0100

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Sincerely,

Name

Signature

Address

559.273.4914

27 January 2017

Other Water Resources Control Bourd 10011 I Street Sucramento, A 95812-2815

Dear Bourd Members: No doubt you are aware at 12,3 TCP, corrently continuiting nearly 400 sources at drinking water in Internia. Like so many carcinogens, this toxic chemical imparts low income rived communities associated with the sale & use of pesticides. I urge you to set a strict standard for 1,2,3 TCP B at 5 parts per million. Also the companies who Manufacture & sell 1,23 TZP should be required to Α

cover the costs born by water districts to treat itainted water supplies. I appreciate your prompt action on this inpurtant 1450c.

Sincerely; 2163 N. Valley Berkeley, CA 94702

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#### January 27, 2017

To: The members of the California State Water Resources Control Board:

Felicia Marcus

Frances Spivy-Weber

Tam Doduc

Steven Moore

Dorene D'Adamo

1000 | Street, Sacramento CA 95814

I urge you to establish a limit of 5 parts per trillion for 1,2,3 trichloropropane in public drinking water.

I also urge you to allow public and private water systems to recoup the cost of treating contamination due to 1,2,3, TCP, from the manufacturers of pesticides which have contributed to contamination by 1,2,3 TCP.

Thanks.

Tom Meshishnek 2140 Acton Street Berkeley CA 94702

1035 Ventura Ave. Albany, CA 94706

State Water Resources Control Board 1001 | St. Sacramento, CA 95812-2815

February 17, 2017

**Dear Board Members:** 

I am writing to express my concern about the dangers of the agricultural chemical 1,2,3 TCP, which has been found in California's drinking water. This chemical is a carcinogen. It endangers the health of our citizens, especially those who live in the rural communities where this pesticide has been used.

It is imperative that regulations be established and enforced so that we are not put at risk by the mere act of drinking water. I am urging you enact a measure that would establish the standard of 5 ppm to keep our water safe. In addition, the cost of treating the water should be collected from those companies that polluted the water in the first place.

Very truly yours,

Steven L. Lucas

For a gming

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February 7, 2017

Dear Members of the Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low-income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

Sincerely,

Opencer D. Smith

Spencer D Smith 935 Hickory Way Fremont, CA 94536

456 1/23/17 Pad DEAR MEMBERS of THE BOARD -No. 937 811E Engineer's Computation 1 Hove RECENTLY LEARNED OF 1,2,3 TEP. THIS MAN-MADE CONCINOSENS THE CONTOMINISTES NEARLY 400 KNOWN COLIFORNIA ORINKING SOURCES. MONY IN LOW INCOME / RURAL COMMUNITIES SMEDILER® Ρ 1 AM WRITING TO PROVEST THAT YOU SET A TEP DEINKING WATER STANDARD AT SPPT TO B a PROTECT PUBLIC HEALTH, are communities IN THE STATE OF CALIFBENIA AND TO LEAD THE WAY FOR THE NOTION. REASE ALSO HOLD COMPANIES WHICH SELL SULL CONTOMINATED POSTICIDES DECOUNTROLE POR Ą THE TREATMENT COSTS ASSOCIATED I THANK YOU. MY WIFE THONKS YOU. MY G AND I YEAR OLD CHEDREN THONK YOU SINKERELY - DANIEL SCOVILL, Lachmag 4008 RAWDOLPH AVE, OAKLOND C

457 1/24/2017 Car Members of the Board: 12,3 TCP is a mon-made Carcinogen that contammates 372 known Culifornia drinking Webber Sources, largely in low-income proll Communities where faulty pesticides were sold. P Please set the ICP drinking water Standowd B de 5 ppt - the determin limit -to proteer l'ablie health and allow water systems to record water meatwent Costs from A the confidences that sold the contaminant A pezatites. Thunk you for your work for the people of California, and, as agenda - servers, for the world! Snieveley, Sesse Barlow 3852 Randolph Ave. Oakland, CA-94602

455 Nevada Avenue San Mateo, CA 94402

R

March 3, 2017

State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

Dear Members of the Board:

As a voter and informed citizen, I am very concerned about the quality of our drinking water, as well as the use of carcinogenic pesticides used in California. 1,2,3 TCP is an example of a man-made carcinogen contaminating water sources in over 350 identified sources of drinking water. This particularly affects low income rural communities in which high levels of this pesticide is sold.

I am asking you to sent the TCP drinking water standard at the detection limit, which is 5 ppt. This will limit the damage from this pesticide and protect the public health of all Californians. I am also requesting that you recoup the additional water treatment costs from the corporations selling toxic chemicals that endangered our citizens and polluted our water sources.

Sincerely yours,

H Ma Ed.D. Dr. Deborah K. Mar, Ed.D.

## 3/3/2017

Dear Members of the State Water Resources Control Board,

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at 5 ppt (the detection limit) to protect the public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

The best legacy we can leave our children is land, water, and skies that are clean A and safe.

В

Sincerely,

John Crowley and family 440 Georgetown Ave. San Mateo, CA 94402

R

Linda S. Mitteness, PhD 462 Hearst Ave San Francisco, CA 94112-1351

6 February 2017

State Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

Dear Members of the Board,

Pesticides are an ongoing danger to human health in California. 1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources (who knows how many unknown private water sources), largely in low-income rural communities where faulty pesticides were sold.

PLEASE set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health. FURTHER please mandate that local water systems recoup water treatment costs from the companies that sold the contaminated pesticides. In an equitable world, those pesticide manufacturers would also be required to pay for safe bottled water for those very poor communities where there are only private wells, not community water systems or with water systems that cannot afford to fix their water treatment programs.

Sincerely,

Linda S. Mitteness, PhD

461 Jeb. 6, 2017 Dear Members of the Board, 1.2,3 TCP is a min-made careinogen that contamin 372 Known California drinking water sources, Argely in law income rural communities where faultif perticides were sald. 1,2,3 TCP is a man Please set the TCP dresking water standard at 5 ppt (the detection limit) to protect public Realth and allow water systems to recomp water treatment Costs from the compenies that sold the contaminated pesticides. Anciely. kukmar genner Jan Francésco, CA- 94112-13-45

Judith C. Barker, PhD 462 Hearst Ave San Francisco, CA 94112-1351

6 February 2017

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PLEASE set the TCP drinking water standard at 5 ppt (the detection limit) to protect public health. FURTHER please mandate that local water systems recoup water treatment costs from the companies that sold the contaminated pesticides. As a medical anthropologist, I have done research on the dental health of small children in poor immigrant communities (largely farm-workers) and have seen the devastating effects on budgets and lives of not having decent water to drink.

R

Sincerely,

Judith C. Barker, PhD

462 February 6, 2017 David & Susan May 139 Forster Shreek California State San Francisco CA Waler Resources Board 9412 1001 I Shreet Sacramonto CA 95812-2815 Doar Board Members: 1 Understand that 1, 2, 3 TCP is a Man-made carcinogen That Contaminates 372 Known Colifornia dvinking Water Souves, largely in low income rural Communities where faulty posticides were sold. Please set the tOP water standard to 5 ppt to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated poshicides Α Thank you for your attention, Sincorely, tim Ho

January 6, 2017

Sate Water Resources Control Board 1001 I Street Sacramento, CA 95812-2815

Dear Members of the SWRCB,

Please set the TCP drinking water standard at five (5) parts per trillion (ppt) to ensure that public health in California is adequately protected. 1,2,3 TCP is a man-made carcinogen contaminating hundreds of California drinking water sources. Please also take action to allow utilities to be reimbursed water treatment costs from the corporations that sold the pesticides contaminated with TCP.

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Thank you for your consideration!

Sincerely Ed McCormick

4038 Brighton Avenue Oakland, CA 94602

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January 25, 2017

Sincerely,

Linden Young

Dear Members of the Board:

1381 Barrows Road. Oakland, CA. 94610

1,2,3 TCP is a man-made carcinogen that contaminates 372 known California drinking water sources, largely in low income rural communities where faulty pesticides were sold.

Please set the TCP drinking water standard at5ppt (the detection limit) to protect public health and allow water systems to recoup water treatment costs from the companies that sold the contaminated pesticides.

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