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July 13, 2006

Ms. Song Her, Clerk to the Board
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comments of Total Chlorine and Chlorine-Produced Oxidants Policy of California, June 2006, Division of Water Quality, State Water Resources Control Board, California EPA

Dear Ms. Song Her:

Disneyland Resort thanks the Board and staff for consideration and response to our comments in our letter dated June 5, 2006.

We appreciate the opportunity to submit the following comment for clarification.

The Effluents Limit section of the Total Chlorine and Chlorine-Produced Oxidants Policy of California, June 2006, third paragraph reads:

“The State Water Board has determined that, at the present time, it is infeasible to use numeric effluent limits for TRC and CPO (~~are feasible~~) to regulate potable water discharges that occur in the field due to the activities of drinking water utilities and agencies. These activities include, but are not limited to, dewatering pipelines and reservoirs, flushing distribution system piping, and flushing fire hydrants.”

From this statement, we believe it is the Board’s intent not to place numeric effluent limits on potable water discharge. However, on its face the above policy statement appears to be limited to potable water discharges by drinking water utilities and agencies. The rationale not to impose TRC and CPO numerical effluent limits applies equally to analogous potable water discharges by the private sector.

The Resort in its June 5, 2006 comments noted that it uses potable water for park washdown, and that no chlorine or other substances are added in this pass-through use of potable water. The Resort then concluded that TRC and CPO limits should not apply to this discharge of potable water. The Board responded to this comment by directing the Resort to the above policy statement ("See Response to Comment 3.6. in the Draft Document, 6/30/2006, Response to Comments on Draft Total Residual Chlorine and Chlorine-Product Oxidants Policy of California").

Because of this response, we believe it is the Board's intent not to impose TRC and CPO limits on the Resort's discharge of potable water used for park washdowns. The Resort therefore recommends the following language:

"The State Water Board has determined that, at the present time, it is infeasible to use numeric effluent limits for TRC and CPO (~~are feasible~~) to regulate potable water discharges that occur in the field due to the activities of drinking water utilities and agencies, **and private industry**. These activities include, but are not limited to, dewatering pipelines and reservoirs, flushing distribution system piping, ~~and~~ flushing fire hydrants, **and pass through use of potable water.**"

We appreciate that the Board has given stakeholders an opportunity to comment once again. This process will ultimately result in scientifically defensible and practicable standards that will protect both the aquatic environment and business interests.

If you have any questions or require additional information, please do not hesitate to contact me at 714-781-4344 or Janina Jarvis 714-781-3563.

Sincerely,

Frank Dela Vara
Technical Director
Disneyland Resort Environmental Affairs