



DEPARTMENT OF THE AIR FORCE

AIR FORCE CENTER FOR ENVIRONMENTAL EXCELLENCE
REGIONAL ENVIRONMENTAL OFFICE, WESTERN REGION
333 MARKET STREET, SUITE 625
SAN FRANCISCO, CALIFORNIA 94105-2196

7 Jul 2005

Ms. Dena McCann
Division of Water Quality
State Water Resources Control Board
1001 I Street
Sacramento, California 95814

Subject: Comments on the Draft Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California, April 2005

Dear Ms. McCann:

Our office appreciates the opportunity to provide comments regarding the draft Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California, April 2005 ("draft Policy"). On behalf of the US Air Force installations in California (Air Force), I am forwarding our comments on the draft Policy (enclosure).

We support the State Water Resources Control Board's efforts to promote consistent procedures in the regulation of total residual chlorine ("TRC") and chlorine-produced oxidants ("CPO"). Our comments are primarily concerned with ensuring that the final Policy allows for flexibility in the monitoring requirements to account for the unique circumstances and discharges found in Air Force installations.

Should you have any questions regarding this matter, please feel free to contact Dr. Baha Zarah or Ms. Aubrey Baure of my staff at (415) 977-8888.


CLARE MENDELSON
Director

Enclosure: US Air Force Comments on Draft Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California, April 2005

cc: Commander, Navy Region SW-DoD REC 9
US Marine Corps Western Regional Environmental Coordinator
US Army Western Regional Environmental Coordinator

**Enclosure: US Air Force Regional Environmental Office, Western Region
Comments on Draft Total Residual Chlorine and Chlorine-Produced Oxidants Policy of
California, April 2005**

1. Page 3, Section titled "Policy Applicability": Suggest adding a statement in this section to emphasize that the draft Policy would apply ONLY to non-storm water NPDES permittees discharging to inland surface waters and enclosed bays and estuaries.
2. Page 4, Part II, Section titled "Determining the Need for Water Quality-Based Effluent Limits": Clarify the phrase "that uses chlorine in its processes". What if a discharger does not use chlorine in its wastewater treatment process, but total residual chlorine is nonetheless present from the influence of a chlorinated potable water supply? Does this situation merit a water quality-based effluent limit under the draft Policy? Similarly, how are discharges from occasional water line / fire hydrant flushing, shocking of water wells, and other discharges of potable water that are meant to have total residual chlorine to be handled under this draft Policy? Suggest including a clarification in the draft Policy stating that the Policy does not apply to discharges of potable water.
3. Page 5, Part II, Section titled "Compliance Schedules": For an existing discharger that is not able to meet the TRC or CPO objectives within the 2-year compliance period, it is unclear who develops the "interim TRC or CPO limitations" and what they would be based on. Are these interim limitations to be developed by the Regional Boards? Will the interim objectives be a consistent value for all non-storm water NPDES permittees? Suggest that the interim objectives be developed by the Regional Boards to suit the specific type of non-storm water discharge.
4. Page 5, Part II, Section titled "Monitoring and Reporting Requirements": Strongly suggest revising the monitoring requirement to be consistent with USEPA's approach. That is, the required frequency of TRC or CPO monitoring must be at a "frequency sufficient to yield data which are representative of the monitored activity including, when appropriate, continuous monitoring." Revision of the monitoring requirement in this manner assures non-storm water NPDES permittees are not economically burdened by the automatic continuous monitoring requirement. Instead, these permittees along with the respective Regional Boards have the flexibility to monitor at a frequency that is adequate and reasonable to their specific type of non-storm water discharge. At one Air Force installation, the non-storm water discharge occurs intermittently, about 6-7 times a year. The discharge pipe runs along a hilly, rugged terrain, and the outlet where current sampling takes place is approximately two miles downstream. In this case, to comply with the continuous monitoring provision of the draft Policy would require installation of approximately two miles of monitoring equipment through rugged terrain. The cost to do so for an intermittent discharge can be significant.
5. Page 5, Part II, Section titled "Monitoring and Reporting Requirements": Strongly suggest revising the monitoring requirement to be consistent with USEPA's approach. That is, a back-up monitoring system for TRC or CPO is not required when the primary monitoring system is off-line for calibration or maintenance. Again, for an intermittent discharge, the additional cost of a back-up monitoring system can be significant.