



**DEPARTMENT OF THE NAVY  
COMMANDER NAVY REGION SOUTHWEST  
937 NO. HARBOR DR.  
SAN DIEGO, CALIFORNIA 92132-0058**

**IN REPLY REFER TO:  
5090  
Ser N45JAB/109  
July 7, 2005**

Division of Water Quality  
State Water Resources Control Board  
Air Resources Board  
1001 I Street, 23rd Floor  
Sacramento, California 95814

Dear Sir/Ma'am:

**RE: STATE WATER RESOURCES CONTROL BOARD'S DRAFT TOTAL RESIDUAL  
CHLORINE (TRC) AND CHLORINE-PRODUCED OXIDANTS (CPO) POLICY**

On behalf of Rear Admiral Betancourt, Commander Navy Region Southwest (CNRSW), I write to communicate military concerns with certain aspects of the proposed policy and to request that the State Water Resources Control Board make appropriate changes to address these military specific concerns. While the military generally supports statewide approaches and state level leadership on many issues, some issues require site-specific recognition and clarification. Such is the case with this policy and is further described below.

The Navy has several NPDES permits with very specific requirements that could conflict with this state policy:

1. Potable water discharges from flushing water utility lines, potable water breaks etc. are currently covered under a NPDES Permit issued by the San Diego Regional Water Quality Control Board. This permit regulates water utilities such as City of San Diego, Helix Water District, and Navy Public Works Center Utilities (via CNRSW). This proposed policy would mandate additional requirements that are inconsistent with existing permits as follows:

- Requirement for continuous monitoring of the discharges, "...one or more data points every minute of discharge...". Potable water Line flushing does not have this capability. Currently potable water line flushing is done with a de-chlorination kit with Chlorine reading taken as a grab sample in the field using a Hach test kit.
- Requirement for salt-water chlorine discharge limit is 0.013 mg/L. Current permit Total Residual Chlorine limit is 0.1 mg/L. New permit is approximately a factor of 10 more stringent than current.

Recommend that the State modify this policy to utilize the SD RWQCB Hydrostatic testing Permit CAG 6790001 as the model vice that which is currently proposed.

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2. Large firefighting deluge systems use large potable water storage tanks as a source for fire fighting. Periodically these deluge systems are operationally tested to ensure operability. Potable water during these tests is discharged and runoff goes through the military installation storm drain system to receiving water. In San Diego, this discharge is permitted under the 3 military facility NPDES Permits. The proposed state policy would require continuous monitoring of those discharges and a dechlorination of the deluge water. Dechlorination may be achieved by de-chlorinating the source tank to the required limits before the testing. However continuous monitoring is currently not possible.

Recommend that the State modify this policy to include an exemption for fire fighting system as this discharge is already covered by a site specific NPDES permit and protective.

Thank you for the opportunity to provide comments on the subject proposed regulation. If you have any questions or concerns regarding these comments, my point of contact is Mr. Rob Chichester at (619) 524-64217.

Sincerely,



A. J. GONZALES  
Captain, U.S. Navy  
Program Director Environment