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July 5, 2005

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

RE: Comments to the CEQA Scoping Meeting for the Proposed Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California.

Dear Ms. McCann:

The Elsinore Valley Municipal Water District (District) would like to provide our comments to the CEQA Scoping Meeting regarding the proposed Total Residual Chlorine (TRC) and Chlorine-Produced Oxidants (CPO) Policy.

Comments on CEQA Process:

- A) To lower the TRC and CPO concentrations in the discharges, the NPDES permit holders need to install or expand the de-chlorination facilities. More chemicals would need to be delivered by trucks, and the chemical storage facilities would also need to be expanded. The expansion of these services and facilities would pose significant hazard to the public for chemical exposure.
- B) Expanding or construction of the larger de-chlorinating facilities would result in more construction activities. These increased construction activities could have a substantial adverse effect to the environment (air quality, soil, aesthetics).
- C) The CEQA study should also quantify how much benefits would the new limits on TRC and CPO gain comparing to the existing TRC and/or CPO limits. The No-Action alternative should be included and studied along with several other alternatives in determining the benefits of this new policy.

In addition to the above comments for the CEQA process, the District also would like to submit the following comments regarding technical details of the proposed policy.

- 1) The policy should define clearly the species of chlorine or chlorine-produced oxidants to be included in the lists of TRC and CPO.
- 2) The proposed policy is supposed to establish consistent procedures for non-storm water NPDES permits to regulate TRC and CPO. It is important for the policy to clarify whether it also applies to all holders of general NPDES discharge permits. A typical general discharge permit, such as the "NPDES Permit for Deminus Discharges", covers intermittent discharges within the service area of the discharger, and they are not at a fixed location. The current monitoring method for TRC only is grab sampling using handheld chlorine testers. Requiring continuous monitoring for these types of intermittent discharges would be difficult for the dischargers to comply technically and practically. Setting up an on-line continuous analyzer for intermittent discharges with varying locations is impossible because of environmental factors (sunlight, motion, temperature, etc), which could affect the readings.
- 3) The effluent limits for TRC and CPO, which are to be issued to a discharge permit, should have consideration for the current technical limitations of available on-line chlorine analyzers. A quick survey of on-line chlorine analyzers indicates that the accuracy or detection limits are generally in the range of 0.035 mg/L to 0.05 mg/L, and the sensitivity is 0.01 mg/L. If the effluent limit is set too low, such as same as the objective of 0.019 mg/L for freshwater, most of the analyzers can not even detect it to that low level. To calibrate analyzer to that low range is also a challenge for the discharger. As indicated on Page 5 of your draft information package, most calibration of chlorine at low range is only down to 0.5 mg/L only.
- 4) If continuous monitoring is required, the policy should also address the frequency of calibration for the analyzer. Whether it is weekly, monthly or quarterly, the policy should also address the appropriate calibration procedures, such as the expected strength of the calibration solution. It would be nice to also specify the procedures to make up this solution. It is anticipated that the laboratory personnel of the discharge will have to make up this solution because there is no chlorine calibration solution available on the market for this low range.
- 5) As mentioned in the draft document, a backup system should be provided during the period when the on-line analyzer is off-line for various reasons. The backup system, if it is specified to be grab sampling and testing with handheld testers, should have the same analytical capabilities as the on-line model, and with similar detection limits. Again, it would be technically challenging to locate handheld testers with the same capabilities as the on-line analyzers. Of course, other laboratory-based methods will work. The limitations are the holding time for the samples. Chlorinated species have the tendency to degrade rapidly.

The District appreciates this opportunity to provide comments for the scoping meeting and for this proposed policy. Should you have any questions regarding this letter, please contact me or Julius Ma at (951) 674-3146.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'P. Miller', with a long horizontal flourish extending to the right.

Philip M. Miller, P.E.
Director of Engineering

cc: Julius Ma, Water Resources Manager
Ted Eich, Wastewater Operations Manager