

Hi Dena,

I have a couple of comments, which I think are appropriate for the CEQA/FED phase of the chlorine/CPO WQO proposal. I hope these are not too late for your consideration.

1) We currently have an NPDES permit for a POTW that discharges to a tributary of the San Diego River with chlorine residual daily maximum, weekly average and monthly average effluent limitations of 20, 8 and 2.0 ug/L, respectively. The 1993 Fact Sheet for this POTW permit states that these limitations are based on the 1986 EPA Ambient Water Criteria. Because the proposed effluent limitation calculation procedure for the proposed WQO result in 1-hr and 4-day average effluent limitations, we are not able to compare the current limits with what the limits would be under the proposal. We are therefore unclear whether the proposal would allow a greater discharge of chlorine to the receiving water and therefore have a negative impact on the environment.

2) The proposal states that measurements that are non-detect (ND) shall be considered zero. Substitution with zero could tend to bias low the calculated average and therefore give an apparent lower average chlorine concentration than what is actually discharged to the environment. The proposal should instead recommend improved approaches to dealing with non-detects and other censored data such as nonparametric methods or parametric "maximum likelihood" methods.

Please contact me if you have questions. Thanks.

-Victor Vasquez

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