



April 13, 2017

PASADENA WATER AND POWER

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California State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Proposed Regulations for the Establishment of a Maximum Contaminant Level for 1, 2, 3 - Trichloropropane

On March 4, 2017 the State Water Resources Control Board (State Board) gave notice of the proposed rulemaking for Maximum Contaminant Level (MCL) for 1, 2, 3 - Trichloropropane (123-TCP). The City of Pasadena Water and Power Department (PWP), a Community Water System (CWS) serving the people of Pasadena, Altadena, East Pasadena, and East San Gabriel, hereby submit the following comments.

PWP supports the development of an MCL for 123-TCP, and believes that the proposed value of 5 nanograms per liter (or parts per trillion/ppt) is the appropriate level for to be set. PWP also supports the use of a Detection Level for Reporting (DLR) of 5 ppt as well as designating Granular Activated Carbon (GAC) as the Best Available Technology (BAT). GAC is an expensive technology, but given the reality that the overwhelming majority of CWSs that have 123-TCP in their water sources have Potentially Responsible Parties (PRPs) who will pay for such a system, GAC does make sense.

However, not every CWS with 123-TCP has PRP. There are some CWSs that have 123-TCP in their source water but no funding available to treat 123-TCP using GAC. Given the high cost of construction and operation, it is cost prohibitive for these CWSs to treat 123-TCP with GAC. These CWSs will in many cases blend down the 123-TCP rather than remove it by using GAC. PWP recommends that the language of the proposed regulations be expanded to recognize blending as a BAT or otherwise explicitly acknowledge it as an approved treatment.

PWP's second comment is to allow a numeric value of zero for laboratory results that are less than the DLR when averaging is used for compliance. When blending is used, a CWS would need to develop a Blending Plan, which would require approval by the Division of Drinking Water, and would include a Blending Objective (BO). The BO is usually 80% of the MCL. Compliance with the BO is determined based on a calculated value, not a measured one. The concentration of the constituent is determined in each source then, using the flow rate and duration of operation of each source, a blended concentration is calculated. If the laboratory results are less than the DLR, then a substitute numeric value is used for averaging. Selecting the appropriate substitute value is critical. For example, where there are two wells, Well A which has 6 ppt of 123-TCP and Well B has less than the DLR, and the first well runs at 1,000 gallons per minute (gpm) and the second at 2,000 gpm and both operate for 24 hours. If the value zero is substituted for less than the DLR, then the calculated blend concentration is 2 ppt, half of the BO of 4 ppt. However, if the substituted value for less than the DLR is 5, the calculated value is 3.7 ppt, just barely below the BO. In either case there is a very narrow window of operational flexibility. The substituted value determines how much operational flexibility there will be. Complicating matters is the fact that few CWS can test for 123-TCP in-house, almost all will have to use contract laboratories. The analytical method is simply a very long, and involved test so turn-around times will not be short. This gives CWS very limited flexibility in terms of response times to elevated results. All in all, a rather difficult operational situation.

For the reasons identified above, PWP recommends that the State Board identify in the proposed regulations the use of blending as an approved treatment technique, and to use zero as a substitute value for laboratory results that are less than the DLR when averaging is used for compliance.

If you have any questions, please contact Mr. David Kimbrough, Water Quality Manager at 626.744.3704 in the mornings or 626.744.7315 in the afternoons.

Thank you for your attention in this matter

Sincerely,



Eric Klinkner
Assistant General Manager/Chief Deputy

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