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September 18, 2006

Gerard J. Thibeault, Executive Officer
California Regional Water Quality Control Board, Santa Ana Region
3737 Main Street, Suite 500
Riverside CA 92501-3339

RE: TRIENNIAL REVIEW PRIORITY LIST

Mr. Thibeault,

On September 7, 2006 I attended a meeting to discuss the draft triennial review priority list. At that time I suggested the possibility for several discharger initiatives that I would like to have considered in the triennial review process. The purpose of this correspondence is to make note of those initiatives and to request that the Board consider the inclusion of a placeholder to recognize them on the priority list.

The Santa Ana River Dischargers Association (SARDA) has identified at least three pollutants for which site-specific objectives may be warranted. Within the next few weeks SARDA will be asking Board staff to participate in a recalculation effort relative to the aluminum water quality criteria. Board staff has imposed monitoring requirements and permit limits for aluminum in newly adopted NPDES permits in the watershed. Staff has relied on national criteria in the absence of state adopted or EPA mandated standards. The national criteria are based on a unique set of environmental conditions that are inconsistent with the physical conditions and aquatic community that exists in this watershed. The Santa Ana River was recently used as a test site for the recalculation of the aluminum criteria by the Arid West Water Quality Research Study funded by USEPA and Pima County Arizona. The report concluded that the national standard was significantly lower than necessary to protect the aquatic life in the Santa Ana River. SARDA will be working with the consultant responsible for that study to develop the findings necessary for Board adoption of site-specific objectives. Although the Board may be able to utilize these findings without adoption into the Basin Plan, such an adoption would be the long-term objective of this project.

If the State adopts the proposed chlorine residual standards it may be appropriate and necessary for the dischargers to request site-specific standards for chlorine.

Lastly, when and if issues related to the proper measurement and implementation of cyanide standards are finalized, a critical assessment of what constitutes an appropriate site-specific standard for that chemical may also be warranted.

The Board has given a high priority to similar efforts in the past and we hope that you will see fit to do so again.

If you have any questions, please contact me at (951) 351-6011.

Sincerely,

A handwritten signature in black ink that reads "Rodney W. Cruze". The signature is written in a cursive style with a large, stylized initial 'R'.

Rodney W. Cruze

Chairman, Santa Ana River Dischargers Association,
Wastewater Operations Manager, Riverside Regional Water Quality Control Plant

Cc: SARDA