San Francisco
Water Power Sewer

Services of the San Francisco Public Utilities Commission

R E C E I V E D

1-17-18

SWRCB Clerk

Commenter ID 06

January 17, 2018

Ms. Melissa Hall, P.E.
Senior Water Resource Control Engineer
State Water Resources Control Board, Division of Drinking Water
1001 I Street, 17th Floor, Sacramento, CA 95814

RE: **Comments – Proposed Revised POU/POE Regulations**

Dear Ms. Hall:

Below are the San Francisco Public Utilities Commission's (SFPUC) comments on the State Water Resources Control Board (SWRCB)'s 12/21/2017 changes of the proposed regulations for point-of-use (POU) and point-of-entry (POE) treatment:

§64418 (b): General Provisions

*"With State Board approval and **without having to meet** the requirement of subsection (a)(6), a public water system may utilize POUs in lieu of centralized treatment for the purpose of reducing contaminants, other than microbial contaminants, volatile organic chemicals, or radon, to levels at or below...but **will not be deemed in compliance without meeting the requirement of subsection (a)(6).** A public water system's application for a permit to utilize pursuant to this subsection may include a request..."*

The first part of the rule under this section is unclear and confusing to readers since it states that a public water system may be approved without meeting the requirement of subsection (a)(6), but then states in Section 64418.8 (a)(3) that the system will be out of compliance if not meeting 64418(b) requirement. Why would the system be granted with the approval for POU use in the first place if this would put the system out of compliance? We suggest clarifying this requirement.

C-01

§64418.1: Immediate Economic Feasibility of Centralized Treatment

The requirements to compare the costs of centralized treatment to the use of POU may not entirely apply to some of the community water systems. For example, the SFPUC's Moccasin Compound Water System would not be able to provide the economic feasibility listed since the rate base does not necessarily cover the capitalization for this system. We suggest adding alternative calculation costs to allow all other systems to meet this requirement.

D-02

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§64418.3 (11)(E): POU Treatment Strategy

If the water system is permitted to use POUs in lieu of centralized treatment for reducing contaminants to achieve compliance, why is the system still required to construct centralized treatment? Since this section requires a schedule for the construction of centralized treatment, we find that the SWRCB doesn't intend to allow POUs as a permanent solution for MCL compliance. This regulation imposes many hurdles including:

F-03

- Apply fund to correct MCL violations,
- Centralized treatment not immediately economically available,
- Public hearings,
- SWRCB's determination of no substantial community opposition,
- SWRCB-approved POU treatment strategy,
- Operations and maintenance program,
- Monitoring program, and
- Ensuring every dwelling unit has POU installed, etc.

Together with the need for construction schedules for a centralized treatment and the above restrictions, we find the proposed regulation may discourage water system to use POU for compliance.

§64418.8 (a)(1): Compliance

This section refers incorrectly to Section 64420.5, which is applicable to POEs. The reference should be corrected to refer to Section 64418.5, which is applicable to POUs.

K-04

Please contact Manouchehr Boozarpour at (650) 652-3109 for any questions.

Sincerely,

Andrew DeGraca, P.E.
Water Quality Division Director

e-cc: Vlad Rakhamimov, SWRCB
       WQD – Water Boards File (Records Management)