



April 20, 2017

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

Re: 1,2,3 -Trichloropropane MCL – “Grandfathering” monitoring data

Dear Chair Marcus and Board Members Doduc, Moore, D’Adamo, and Esquivel:

We are writing to express our view on the issue of allowing water systems to use TCP monitoring data collected before the MCL is adopted, which was brought up before the Board during the workshop held on April 18th.

As we all indicated in our oral testimony, moving forward with both the adoption and implementation of the MCL is critical given the continued public exposure to a particularly potent carcinogen. The Division of Drinking Water (DDW) demonstrated their understanding of this when they recommended to potentially contaminated water systems that they begin monitoring as a means of determining if they had TCP detections and if so, characterizing the level of the problem. While there could be some fluctuations in contaminant levels over time, we believe that the monitoring done provides a reliable picture of where TCP is occurring. In addition, once it becomes a regulated contaminant, a degree of monitoring will continue in vulnerable regions.

Our organizations support amending Title 22, Section 64445 (Initial Sampling – Organic Chemicals) as “to allow limited ‘grandfathering’ of monitoring data collected prior to the effective date of any regulation establishing an MCL for an organic chemical”. This will establish a method for public water systems to substitute existing monitoring results to meet initial requirements under certain conditions, fundamentally allowing water systems to “hit the ground running once the MCL goes into effect.

We see this grandfathering amendment as a well calibrated policy that incentivized early monitoring and planning for the ultimate regulation. We respectfully disagree with those who oppose the amendment and would be disappointed to both slow down potential early action by impacted systems to comply with the MCL, or to add more of a financial burden

than is necessary to water providers who are now moving toward investments in treatment.

Sincerely,



Andria Ventura
Toxics Program Manager
Clean Water Action



Laurel Firestone
Co-Executive Director
Community Water Center