



April 21, 2017

Submitted via electronic mail to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

**RE: 1,2,3-Trichloropropane Maximum Contaminant Level (SBDDW-17-001)**

Dear Ms. Townsend:

The undersigned water supply agencies appreciate this opportunity to submit comments to the State Water Resources Control Board (Water Board) on the proposed regulatory action to establish a Maximum Contaminant Level (MCL) for 1,2,3-Trichloropropane (1,2,3-TCP). The undersigned agencies provide retail and wholesale water supply services to a collective population of 650,000 residents in western San Bernardino and Riverside counties.

Our agencies support and join the comments submitted by the Association of California Water Agencies (ACWA). Like ACWA, we support the regulation of contaminants that are known health hazards in drinking water, and we support the adoption of the proposed MCL for 1,2,3-TCP.

**However, we are deeply concerned that the proposed regulation does not provide adequate time needed to undertake major compliance actions, such as designing, financing and constructing water treatment facilities, to comply with the new regulation before a public water system is found to be in violation of the new MCL.** Typically, at least two years are required for public agencies to raise sufficient funds, complete environmental review, bid construction contracts, and complete installation of treatment systems. In the interim, under the proposed regulation our agencies will be forced into noncompliance, which will require us to either turn off wells and/or notify our customers that their water no longer meets public health requirements. The result of such noncompliance is a severe reduction in water supply reliability, liability to lawsuits, and a loss of public trust.

**Nor does the proposed regulation clearly identify the range of actions that may be taken to achieve compliance, including system blending.** Blending has been used successfully by many water suppliers to achieve compliance with other water quality standards. The Water Board, in its July 2016 public workshop presentations, recognized blending as an option for compliance. However, the proposed regulation does not include blending as a best available technology (BAT), nor does it provide guidance on how blending could be used to achieve compliance.

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**City of Chino, Chino Desalter Authority, Monte Vista Water District**  
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We share the concerns about the serious public health impacts of 1,2,3-TCP and have already initiated steps to investigate the extent to which our water supplies are impacted by this chemical and to assess the specific scope and treatment facilities that will be required to be constructed in order to achieve compliance.

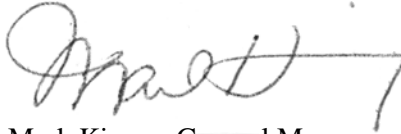
The reality is that the proposed MCL will result in significant financial and water supply reliability impacts for our agencies (see attached). We request the Water Board's help in mapping out acceptable compliance strategies and a reasonable period of time in which to implement these strategies before being found in violation of the MCL. We specifically ask that the Water Board take the following actions:


1. **Amend the proposed rule to provide a specific, reasonable time period for public water systems to achieve compliance with the new 1,2,3-TCP MCL before being deemed in violation.** Public systems typically need 2-3 years to construct the infrastructure to achieve compliance. At the very least, the proposed rule should provide a compliance pathway similar to the one established for hexavalent chromium VI by SB 385 (Chapter 282, Section 116431 of the Health and Safety Code) in which the Water Board can review and pre-approve compliance plans to provide adequate time to construct treatment facilities before a system is deemed in violation. This compliance pathway includes public notice as well as the specific actions and timeframe in which compliance will be achieved.
  
2. **Amend the proposed rule to clarify that system blending may be used to comply with the new 1,2,3-TCP MCL as presented in the Board's workshops.** Since the new MCL is set at the current testing capacity to detect 1,2,3-TCP in water supplies, it is important the rule also provide guidance for how to use blending to achieve compliance.

Thank you for considering our comments. Should you have any questions, please do not hesitate to contact Mark Kinsey, general manager of Monte Vista Water District, at [mkinsey@mvwd.org](mailto:mkinsey@mvwd.org) or (909) 624-0035; Amanda Coker, associate engineer of City of Chino, at [acoker@cityofchino.org](mailto:acoker@cityofchino.org) or 909-334-3508; or Curtis Paxton, general manager of Chino Basin Desalter Authority, at [cpaxton@chinodesalter.org](mailto:cpaxton@chinodesalter.org) or (909) 218-3729.

Sincerely,

  
Matthew Ballantyne, City Manager  
City of Chino

  
Mark Kinsey, General Manager  
Monte Vista Water District

  
Curtis D. Paxton, General Manager / CEO  
Chino Basin Desalter Authority

Attachment

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**Attachment**

The proposed MCL will result in significant financial and water supply reliability impacts for our agencies. We currently are attempting to assess the specific scope and treatment facilities that will be required to be constructed in order to achieve compliance. The below estimates, presented for purposes of illustration, are based on the installation of the proposed best available technology (BAT), granular activated carbon, identified in the proposed regulation on all impacted wells:

City of Chino

- Number of wells impacted: 12 wells (all City wells impacted)
- Total impacted well capacity: 17,000 gpm
- Percentage of total available supply: 80% <sup>1</sup>
- BAT treatment cost: \$15 million <sup>2</sup>

Chino Desalter Authority

- Number of wells impacted: 7 wells
- Total impacted well capacity: 2,500 gpm
- Percentage of total available supply: 15%
- BAT treatment cost: \$2.5 million

Monte Vista Water District

- Number of wells impacted: 7 wells
- Total impacted well capacity: 9,900 gpm
- Percentage of total available supply: 33%
- Estimated BAT treatment cost: \$12.5 million

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<sup>1</sup> Includes City-supplied groundwater and purchased water supplied by the Chino Basin Desalter Authority, which is also impacted by 1,2,3-TCP – see above.

<sup>2</sup> Assumes blending is recognized as a BAT for 1,2,3 TCP and is utilized at two (2) City wells.