



336 Pacific Avenue • Shafter, California 93263



April 20, 2017

Ms. Jeanine Townsend
State Water Resources Control Board
P.O. Box 997377
MS 7400
Sacramento, CA 95899-7377

Dear Ms. Townsend:

This letter is being sent as a formal, written response to the “Notice Of Proposed Rulemaking” which covers a public health standard for 1,2,3-trichloropropane (“TCP”). The City of Shafter understands that the proposed maximum contaminant level under consideration is 5 parts per trillion (ppt) and that the State is accepting comments on this proposal through April 21, 2017.

The City appreciates the State’s concerns about TCP and its efforts to develop a health standard for it because it has been detected in Shafter’s water supply for over 20 years and it is present at all of our wells. Even without a standard in effect right now, we have taken a very proactive stance on dealing with this health issue with staff, funding and other resources. Our first full-scale TCP treatment system at one well was installed in 2013 and we were piloting TCP treatment options prior to that. We’ve also secured funding to construct TCP treatment at all of our existing wells plus we plan to update water service rates by this July 1st to ensure the operation and maintenance of the treatment systems are properly funded. This funding has assumed and will continue to plan on a MCL of 5 ppt. All current and planned treatment involve the use of granulated activated carbon (GAC) to reduce TCP to 5 ppt or non-detect levels.

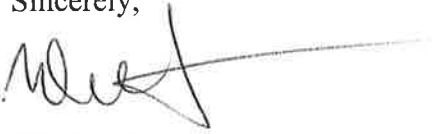
The main concern the City has regarding recent action and updates from the State regarding TCP is a possibility that a “series” layout of treatment vessels will eventually be required and the “parallel” layout will no longer be accepted. To date, the current TCP treatment we have in operation at one well and a future treatment system under design for another well both rely on a parallel system. We acknowledge that there are some inefficiencies with parallel systems, particularly the likelihood that not all of GAC will be utilized before the need arises to reload the vessels all at once. During the inception phase of our TCP action plan, we considered the parallel reloading inefficiencies versus the higher capital costs and larger space required for a series system and ultimately decided that a parallel system was in the best economic interests of our customers. If the State chooses to enforce a series layout with new operational permits for TCP treatment, Shafter and other systems will likely be faced with unnecessary costs to comply with

Ms. Jeanine Townsend, State Water Resources Control Board
April 20, 2017
Page 2

the standard. It should be noted that many of the affected systems, including Shafter, serve severely disadvantaged communities. We are confident the needs of these particular communities were factored into the decision on what to recommend for a MCL. However, it is still worth noting that the standard and the ongoing funding to enforce the standard affect them. Therefore, the State should allow some operational flexibility on a water system's part to meet the standard through the most economically viable treatment systems possible.

We appreciate the opportunity to address the State's standard for TCP and look forward to working with your staff to ensure that it meets the needs of all Californians.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael James", with a long horizontal stroke extending to the right.

Michael James
Public Works Director

cc: Marcos Torres, City of Shafter
Scott Hurlbert, City of Shafter
Tricia Wathen, SWRCB