6/21/06 BdMtg Item ___
Chlorine Policy
Deadline: June 5, 2006

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5:10 pm

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SWRCB
Executive Ofc.

Ms. Song Her, Clerk to the Board
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comments – Chlorine Policy

Dear Ms. Her:

Sempra Energy, the parent company of San Diego Gas & Electric (SDG&E) and the Southern California Gas Company (SCG), appreciates his opportunity to comment on the State Water Resource Control Board (SWRCB) Proposed Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California (TRC Policy), which would have a significant impact on the business operations of our companies.

Specifically, the regulations propose a standard relating to temporary and intermittent pipeline hydrostatic test water discharges and construction dewatering that is not technically or chemically possible for either SDG&E or SCG to comply.

SDG&E and SCG operate and maintain thousands of miles of natural gas pipelines that are routinely monitored and checked for integrity and safety. These pipelines are hydrostatically pressure tested according to safety regulations with potable water; other methods are often impractical due to location. There are no analytical methods to test the level of residual chlorination or to apply dechlorination treatment processes would result in the proposed level of treatment. It would be technically impossible for SDG&E and SCG to meet the proposed standard, which could result in future permits prohibiting such discharges and making it impossible to comply with both mandatory safety regulations.

Sempra Energy request that the proposed regulations be amended to include exceptions to the policy or provide a mechanism for situation specific regulation at the discretion of the local RWQCB or municipality. While we understand the desire to have statewide policy and regulations, a broad brush approach to address chlorine discharges is impractical and will be impossible for SDG&E and SCG comply and could potentially impact their ability to provide safe and reliable utility service.

Sempra Energy request SWRCB amend the proposed regulation to allow regulated utilities to operate under local MS4 permits and ordinances and local RWQCB General Permits and variances that are able to ensure that local potable water discharges do not impact local water quality, yet provide more situation specific regulation allowing compliance with both safety and water quality requirements.

Sempra Energy appreciates the opportunity to work with the SWRCB on the proposed TRC policy. Thank you for consideration of our recommendations. If you have any questions regarding these comments, please contact Mr. Scott Koken at (858) 637-3727.

Very truly yours,

G. Scott Koken
Water Quality Supervisor
Sempra Utilities

From: "Koken, George Scott" <SKoken@semprautilities.com>
To: <commentletters@waterboards.ca.gov>
Date: Mon, Jun 5, 2006 5:10 PM
Subject: Chlorine Policy Comments

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Thank you for this opportunity to Comment

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