



July 23, 2010

Via Electronic Mail

Mr. Paul Hann  
Chief, Planning Standards and Implementation Unit  
California State Water Resources Control Board,  
Division of Water Quality  
1001 I Street, 15th Floor  
Sacramento, CA 95814  
[phann@waterboards.ca.gov](mailto:phann@waterboards.ca.gov)

**SUBJECT: PRELIMINARY DRAFT POLICY REGARDING WHOLE  
EFFLUENT TOXICITY**

Dear Mr. Hann:

The above listed statewide and regional clean water associations appreciate the opportunity to provide comments on the preliminary draft policy for whole effluent toxicity (WET). The constituency base for our organizations collects, treats, and reclaims more than two billion gallons of wastewater each day and serves most of the sewered population of California. Our associations are regular participants in water quality regulatory matters before the State Water Resources Control Board (State Water Board). We have found this type of informal comment process to be very helpful in narrowing the issues for formal comment and in clarifying the intent and language of proposed policies.

We are writing to request that you grant a 30-day extension of the deadline for informal comments on the proposed policy. As I am sure you are aware, the WET policy is of critical importance to the public wastewater community. In addition, the issue of whether and how to address WET implementation and permitting has been a topic of scientific, technical and legal debate for many years, not only in California but nationally. Development of an appropriate WET policy involves consideration of complex scientific information, as well as regulatory considerations. The publicly owned treatment works (POTW) community is committed to providing the State Water Board with carefully crafted and credible comments that will assist in developing the final proposed policy. However, we are not able to do so within the limited time provided for review, particularly given that the proposed policy takes a very different approach to POTW regulation than the State Water Board's scoping process contemplated.

Mr. Paul Hann

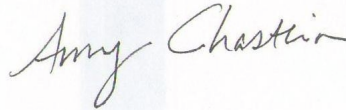
Re: Preliminary Draft Policy Regarding Whole Effluent Toxicity

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We believe the State Water Board's process will be aided by allowing additional time for comments on the preliminary draft policy. We would appreciate hearing from you at your earliest convenience as to whether the additional time will be made available. Please contact Roberta Larson at (916) 469-3887 or [blarson@somachlaw.com](mailto:blarson@somachlaw.com) if you have any questions.

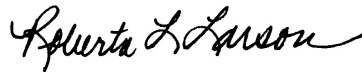
Sincerely,



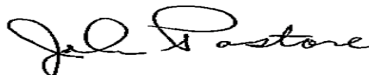
Executive Director  
BACWA  
[achastain@bacwa.org](mailto:achastain@bacwa.org)



Ben Horenstein  
Chair  
Tri-TAC  
[bhorenst@ebmud.com](mailto:bhorenst@ebmud.com)



Roberta L. Larson  
Director, Legal & Regulatory Affairs  
CASA  
[blarson@somachlaw.com](mailto:blarson@somachlaw.com)



John Pastore  
Executive Director  
SCAP  
[jpastore@dudek.com](mailto:jpastore@dudek.com)



Debbie Webster  
Executive Director  
CVCWA  
[eofficer@cvcwa.org](mailto:eofficer@cvcwa.org)

cc: Darrin Polhemus, Deputy Director (via electronic mail)