



Sacramento Legislative Office

March 19, 2019

The Honorable Blanca Rubio
Member, California State Assembly
State Capitol, Room 5175
Sacramento, CA 95814

RE: AB 1204: Public water systems: primary drinking water standards: implementation date
SUPPORT

Assembly Environmental Safety and Toxic Materials Committee – March 26, 2019

Dear Assembly Member Rubio:

The Metropolitan Water District of Southern California is pleased to support AB 1204, as introduced, that requires the State Water Resources Control Board (State Water Board) to allow water providers a reasonable period of time to complete work required to comply with the new Maximum Contaminant Level (MCL), without being found in violation.

Metropolitan is the primary water wholesaler for the Southern California region and providing safe and treated supplies to our 26 member agencies throughout our six-county service territory is our primary mission. AB 1204 would benefit Metropolitan and our member agencies. Unlike the federal Safe Drinking Water Act, the State MCL regulation process has the effect of deeming some water systems in violation less than one year after the establishment of any new MCL in spite of their timely actions and due diligence to get treatment solutions in place.

When the State Water Board establishes a new MCL for a contaminant, water agencies must begin monitoring within six months of the MCL effective date or beginning in January of the calendar year following the MCL effective date, depending on the nature of the contaminant. Consequently, water agencies that are affected by a new MCL may be deemed out of compliance with the standard within a few months of the regulation effective date.

In July 2017, during the 1,2,3-TCP rulemaking process, Metropolitan staff testified at a State Water Board hearing requesting an extension on the compliance period citing time required to procure and install best available technology. In our oral testimony, we shared our experience working with the City of Los Angeles to install granular activated carbon on two wells closed by contamination. The \$12 million project—rushed into service because of the drought—took nearly two years to complete even though granular activated charcoal was well established as best-available technology. As this example demonstrates, it would be beneficial to water districts if California adopted a fair and reasonable compliance period similar to that of the U.S. Environmental Protection Agency.

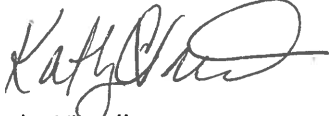
The Honorable Blanca Rubio

Page 2

March 19, 2019

AB 1204 is a responsible approach that balances the State Water Board's need to enforce compliance standards while acknowledging some water agencies require additional time to take measures to meet new MCL standards. Therefore, Metropolitan supports AB 1204. If you should have any questions or concerns regarding Metropolitan's position on your bill, please contact me at (916) 650-2614 or kviatella@mwdh2o.com.

Sincerely,



Kathy Viatella

Executive Legislative Representative

cc: Assembly Environmental Safety and Toxics Material Committee
Pajau Vangay, Consultant, Assembly Environmental Safety and Toxics Material Committee
Gregory Melkonian, Consultant, Assembly Republican Caucus