



September 12, 2011

*Sent via e-mail*

Fran Kammerer  
Office of Environmental Health Hazard Assessment  
P. O. Box 4010  
1001 I Street  
Sacramento, California 95812-4010

Re: Proposed Green Chemistry Toxics Information Clearinghouse Regulation

Dear Ms. Kammerer:

On behalf of the Bay Area Clean Water Agencies (BACWA) and the Bay Area Pollution Prevention Group (BAPPG), we would like to express our support for the proposed Green Chemistry Toxics Inventory Clearinghouse (TIC) regulation. BACWA is a joint powers agency whose members own and operate the forty wastewater treatment plants and sanitary sewer systems that serve almost seven million people in the San Francisco Bay Area. BACWA members are public agencies charged with protecting the environment and public health. BAPPG coordinates agencies' pollution prevention efforts and manages regional projects designed to reduce pollution in the Bay.

Many wastewater agencies are concerned about the growing number of consumer products that contain ingredients that may compromise effluent quality, treatment plant operations, biosolids management options, and our compliance with NPDES permit requirements. We support the concept of Green Chemistry with the hope it can stem the tide of harmful chemicals that all too often make their way down drains to our wastewater treatment plants.

We are pleased that the proposed regulation defines a very comprehensive set of hazard traits and environmental and toxicological end-points that will assist in the development of a meaningful TIC database. We appreciate the changes made in Sections 69404.3 and 69405.3, with regard to wastewater treatment organisms and processes, and environmental persistence of chemicals in fresh, estuarine and marine waters and sediments.

The wastewater community supports the proposed regulation and believes it will provide a strong foundation for the Department of Toxic Substances Control's development of criteria to evaluate chemicals and alternatives. Please contact Jen Jackson at 510-287-0818 or [jacksonj@ebmud.com](mailto:jacksonj@ebmud.com) if you have any questions.

Sincerely yours,

A handwritten signature in black ink that reads "Amy Chastain".

Amy Chastain  
Executive Director

A handwritten signature in black ink that reads "Sarah Scheidt".

Sarah Scheidt  
Chair, Bay Area Pollution Prevention Group