

Chlorine Policy
Deadline: 7/14/06 5pm

From: Carol Thornton <cthortonbook@yahoo.com>
To: <commentletters@waterboards.ca.gov>
Date: Fri, Jul 14, 2006 1:44 PM
Subject: Comment Letter - Chlorine Policy

I am writing to request that the State Board not adopt the proposed Total Chlorine and Chlorine-Produced Oxidants Policy of California", and, instead, extend the comment period so that the public and involved agencies may respond to the changes that were put into the policy at the last minute. I have seen many instances where spills of chloramine have caused great damage to local creeks, killing fish, frogs and other wildlife. The State Board policy on Chlorine and Chloramine should be strengthened, not weakened. Potable water purveyors should have to comply with numeric limits of total residual chlorine and chlorine produced oxidants, not just best management practices with no monitoring requirements. I understand that the water agencies are saying that there is no equipment that will test to the level needed for water quality objectives. I believe it has been shown that there is such equipment commercially available. At the very least, it could be required that agencies test to the lowest achievable reporting limit provided by commercially available field testing equipment.

By only requiring BMPs, the only way to know if they succeed is if there is or is not environmental degradation, that is, that beneficial uses had already been impaired. This is not in compliance with the Water Boards own Basin Plans.

Please reconsider this policy and make it reflect the objectives of the Water Resources Control Board.

Sincerely,
Carol Thornton
1427 Derby Street
Berkeley, CA 94702

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