06/21/06 BMtg Item
Chlorine Policy
Deadline: June 5, 2006

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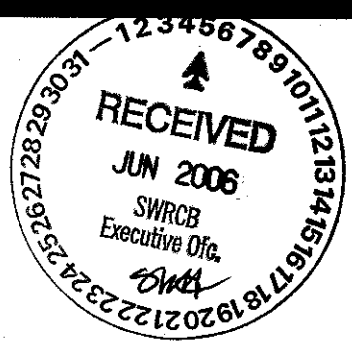

June 5, 2006

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

RE: Comments Concerning Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California

Hach Company appreciates the opportunity to provide comments on the draft Total Chlorine and Chlorine-Produced Oxidants Policy of California, April 2006. As a developer and manufacturer of on-line and laboratory instrumentation for the measurement of total residual chlorine (TRC) and chlorine-produced oxidants, Hach Company has considerable interest in the technical merits of the State's implementation of this policy. Our comments are offered below:

Continuous Chlorine Residual Discharge Limits

We know of no instrument manufacturer that currently produces an on-line instrument for the measurement of TRC and CPO that can be verified from a calibration standard below 10 $\mu g\ L^{-1}$.

Quantification/Reporting Requirements

The 4-day average of 7.5 $\mu g\ L^{-1}$ for CPO in saltwater is below the practical quantitation limit of the method (Standard Method 4500-Cl E, 20th ed.) specified to verify solution concentration in off-line measurements. Verification concentration is inconsistent with the 4-day CPO average.

Compliance Determination (dechlorination residual using bisulfite or sulfite)

The minimum positive residual of sulfite that can be detected in water is 2000 $\mu g\ L^{-1}$ or 2 parts per million. This would lead to significant overdosing of sulfite to demonstrate a dechlorination residual.

Hach Company believes that before the State of California takes final action as to this Policy, a consensus technical workgroup consisting of representatives from the State Water Resources Control Board, stakeholders and their advocates, engineering firms, and instrument manufacturer be established to resolve these above cited issues.

Respectively submitted,

Cary B. Jackson, Ph.D.
Director of Regulatory Affairs

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