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To: <commentletters@waterboards.ca.gov>
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Subject: Comments - Chlorine Policy

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

June 5, 2006

Song Her, Clerk to the Board
State Water Resources Control Board



As a water utility that could be impacted by the proposed Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California, we would like offer a brief comment. It appears that the proposed limit of 0.19 ug/l total residual chlorine for all discharges is infeasible for discharges from potable water systems. For one thing, it's not possible to achieve the required level of accuracy required using field monitoring equipment. Therefore, discharges could only be made following laboratory analyses and by the time these results are obtained, the parameters of the water in the water system may have changed. In addition, we have conducted field tests which indicate that in most cases the chlorine levels in the water degrade within a few minutes following discharge.

Since potable water disinfection and flushing are valuable tools for providing healthy water, we recommend that this proposed policy exclude potable water discharges. This will allow water systems to continue to provide safe drinking water to their communities.

Thank you for your consideration of these comments,

Dick Wilson
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