

Humboldt Community Services District

Dedicated to providing high quality, cost effective water and sewer service for our customers

June 29, 2006

Chlorine Policy
Deadline: 7/14/06 5pm

Song Her, Clerk to the Board
State Water Resources Control Board
10011 I Street, 24th Floor
Sacramento, CA 95814



Subject: Draft Chlorine Policy

Your regulatory agency is reviewing the draft Chlorine Policy. Our concerns are the possible direction that "chlorinated drinking water spills" regulation may be going. Clean water spills/discharges can happen during routine maintenance, repair, or accidental infrastructure damage. We ask you to please keep in perspective the numerous Federal and State governed policies of disinfection standards that we, as water providers, are required to maintain.

Our world of governing acronyms includes, but is not limited to, NS4, RWQCB, NPDES, MAP, BET, and BAPs. The Implementation of these standards requires BMPs (Best Management Practices). Monitoring by BAT (Best Available Technology) in the field to meet the proposed goal of a dechlorination level of 0.019mg/L is not currently possible.

At this time, methods or devices to accurately measure this residual are not available.

Please know, any water loss represents a financial burden to our community. Our constant goal is to have zero Treated Water Spills (TWSs). On the rare occasion one does occur, we take quick and regulated action as mentioned above to ensure public safety and minimal loss.

We all live in a sensitive environment. As you formulate this "Chlorine Policy," please keep in mind the need for balance between function of technology and the function of effectiveness.

Sincerely,

A handwritten signature in black ink, appearing to be "Mark Bryant".

Mark Bryant
General Manager

MB/bkf

Cc: Senator Wes Chesbro
Assembly Member Patty Berg
Association of California Water Agencies