

6/21/06 BdMtg Item
Chlorine Policy
Deadline: June 5, 2006



City of South Gate

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ROBERT DICKEY
DIRECTOR OF PUBLIC WORKS

June 5, 2006

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| Post-It® Fax Note | 7671 | Date | 06-05-06 | # of pages | 52 |
| To | SONG HER | | | | |
| From | | | | | |
| Co./Dept. | | | | | |
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Mr. Song Her
STATE WATER RESOURCES CONTROL BOARD
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: *Comments Regarding the Proposed Total Residual Chlorine And Chlorine-Produced Oxidants Policy*

Dear Mr. Her:

We have reviewed the proposed regulations that are tentatively scheduled to be heard at the State Board's meeting on June 19, 2006. The City of South Gate supports efforts to improve our environment and for several years now has been implementing chlorine reduction BMP's in order to prevent any discharges containing over 0.1 part per million (ppm) of residual chlorine. The proposed regulations rely on a time-based equation to establish instantaneous maximum discharge limits, which appears to both raise the city's limit for short-term discharges and lower the limits for long-term discharges.

We have these comments regarding the proposed regulations:

1. The proposed regulation will essentially establish limit ranges between 0.2 ppm and 0.011 ppm. Under optimum conditions, current and readily available field monitoring equipment has detection limits of 0.060 ppm or more than 5 times the most restrictive limit. It does not seem reasonable or practical to set a concentration limit below what can be tested for. More appropriate limitation language would be "Dischargers that implement BMPs with known chlorine reduction capabilities and in accordance with manufacturer's directions shall be deemed in compliance with this regulation if field monitoring equipment shows the residual chlorine concentration in the discharge is less than the time-based limit or is non-detectable."

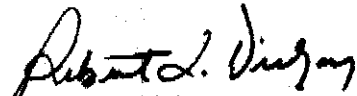
2. The regulations appear to be more directed for facilities with long term ongoing discharges where in-line monitoring equipment might be feasible. There are no provisions for accidental or emergency conditions. It is well known that vehicles often hit fire hydrants and that water supply line and valves break. For these unplanned incidents, the first responders will shut off the supply valve to the discharges. This is the best BMP to reduce the residual chlorine and should be acknowledged as such in the language of the proposed regulation: "Where a discharge is the result of an unplanned incident, if the discharge source is stopped as quickly as possible by the first responders, no instantaneous or continuous discharge limits apply."

Mr. Song Her
June 5, 2006
Page 2

The City appreciates the effort the State Board's staff has put into drafting these proposed regulations and the innovative time-base equations that have been developed. The City supports scientifically based and economically achievable efforts to reduce the discharge of pollutants into the waterways.

Please contact me if you have any questions.

Sincerely,



Robert T. Dickey
Director of Public Works

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