

Chlorine Policy
Deadline: 7/14/06 5pm

From: <F5creeks@aol.com>
To: <commentletters@waterboards.ca.gov>
Date: Thu, Jul 13, 2006 9:38 PM
Subject: Comment letter -- chlorine policy

To: California State Water Quality Control Board
Song Her, Clerk of the Board

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Members of the Board:

Please do not adopt the draft policy on chlorines with the current limitation that discharges of potable water due to activities of drinking-water utilities or agencies may be regulated by Best Management Practices only.

As you know, chloramines used in treating drinking water can be and are toxic to fish and other aquatic life. Water-main breaks, hydrant flushing and other common occurrences can and have caused fish kills. Limiting regulation to BMPs only would mean that Regional Board could not require water utilities and similar entities to monitor actual amounts discharged. They also could not limit the amount of chloramines discharged into creeks.

While these limits may be appropriate in some circumstances, they are not appropriate to all. Without monitoring, how would anyone know whether BMPs were successful? Without limits, water agencies could simply let leaks go on forever. (This does happen. For years, EB MUD refused to try to repair a chloramine discharge into the North Fork of Cerrito Creek, with the explanation that it would be too costly and inconvenient to find and repair it, since the water came from a pipe somewhere within a fairly large area and flowed into an unknown location somewhere along several hundred feet of culverted creek.)

This policy would undermine current efforts of citizen groups, local governments, and EB MUD to develop a plan to control chloramine releases.

Please give Regional Board the option of developing stronger regulations for potable-water discharges. Creating uniform policy should not mean limiting all to a low standard -- we have seen too much of that in federal actions recently.

Thank you for your attention to this matter.

Sincerely,

Susan Schwartz, President
Friends of Five Creeks

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