



Chlorine Policy
Deadline: 7/14/06 5pm

COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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July 14, 2006
File No. 31-370.40.4A

Ms. Tam Doduc, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Dear Chair Doduc:

Comments on the April 2006 "Draft Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California"

The County Sanitation Districts of Los Angeles County (Districts) appreciates the opportunity to comment on the "Draft Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California." The Districts provide wastewater collection and treatment, and solid waste management services for approximately 5.5 million people in Los Angeles County. As part of the wastewater treatment services, the Districts own and operate seven water reclamation plants (WRPs) that discharge to inland surface waters. These seven WRPs currently utilize a chloramination disinfection process. Therefore this Policy, when adopted, will affect these Districts' facilities.

During the development of the Draft Policy over the past year, the Districts have commented to the State Water Board on several occasions regarding numerous concerns. We appreciate the time that the State Water Board has spent with Districts' staff to address some of these concerns. Based on the June 2006 revisions to the draft Policy, the Districts believe that the Policy, in general, is now much more workable than prior versions. The June 2006 revisions include numerous clarifications that more clearly describe the State Water Board's intent of the Policy requirements.

Although, the June draft Policy is more workable, there are still some areas that need further refinement. For instance, there seems to still be a disconnect between the State Water Board's desired performance of the on-line chlorine residual devices and the actual performance of these devices, specifically related to detection levels, accuracy, precision and response time.

For example, the Districts have submitted data demonstrating that a continuous on-line chlorine analyzer cannot accurately measure low levels of chlorine residual in wastewater. Our laboratory tests indicate that measurements below 50 ug/L may essentially be equipment noise and do not actually reflect the concentration of chlorine in a sample. (Those tests were conducted in deionized water, the values

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were much higher in a wastewater matrix.) Nonetheless, the current draft of the Policy states that measurements above 10 ug/L must be reported as measured values.

Because of this gap between the desired and actual performance, the Policy encourages determining compliance using the approved alternative, a direct measurement of a positive residual dechlorination agent with a continuous monitoring analyzer. The Districts believe that a demonstration of the presence of a positive residual dechlorination agent on a continuous basis can reliably be achieved by using an indirect measurement utilizing a stoichiometric verification as well as by using a continuous analyzer to measure dechlorinating agent. As currently drafted, however, the Policy only allows stoichiometric checks as an alternate compliance verification as a back-up method should the continuous monitoring system go off-line. Consequently, the Districts will have to purchase and maintain additional field instrumentation to make a direct measurement of positive dechlorinating agent when the same demonstration can be made through indirect measurements (stoichiometric checks). The Districts would greatly prefer more flexibility in the Policy so that we could provide stoichiometric verification of compliance with the chlorine criteria instead of performing continuous monitoring with meters of unproven accuracy and precision.

In closing, the recent revisions to the draft Policy represent significant improvements. However, the Districts encourage the State Water Board to continue to refine the draft Policy in an effort to make it even more workable for dischargers to implement. If you have any questions please contact the undersigned at 562/908-4288, extension 2502 or Ms. Beth Bax at extension 2835.

Very truly yours,

James F. Stahl



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