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Kathy Cooper

From: ecomment@pa.gov
Sent: Monday, April 18, 2016 10:36 PM
To: Environment-Committee@pasenate.com; IRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; gvitali@pahouse.net; regcomments@pa.gov; apankake@pasen.gov
Cc: ra-epmsdevelopment@pa.gov
Subject: Comment received - Proposed Rulemaking: Disinfection Requirements Rule



Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Disinfection Requirements Rule.

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IRRC
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Commenter Information:

Charles Farley
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Comments entered:

I would like to express my concern over the Minimum 0.2 mg/L Chlorine Residual for small water systems utilizing Free Chlorine Residuals. Many, if not most, small water system operators and managers agree with HACH Company study's findings that 0.06 mg/L (rounded up to 0.1 mg/L) should be considered the minimum detectable limit and would further agree that DEP should recognized 0.1 mg/L as the official (regulated) minimum chlorine residual for distribution systems (both free and total).

However, in the Proposed Rule-making publication DEP makes references to regional and national standards (10 states and WRF) and how they are being used to optimize water distribution systems. DEP's intentions to regulate standards for water systems utilizing free chlorination and not for systems utilizing chloramines gives the appearance of being bias.

Costs associated with maintaining higher entry point residuals, additional flushing, and capital improvements will be far greater for free chlorine systems if 0.2 mg/L is required as opposed to 0.1 mg/L.

Thanks you for this opportunity to comment on this very important regulation.

Chuck Farley
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