August 10, 2005

I have a few comments regarding Section S5.B.3.b.v

v. Untreated water line flushing discharges, untreated planned discharges from potable water sources, and untreated swimming pool discharges are not allowed in the MS4. The ordinance or other regulatory mechanism enacted pursuant to S5.B.4.b.i above shall prescribe that these types of non-stormwater discharges must meet the conditions below:

> * Water line flushing and discharges from potable water sources: planned discharges from water lines and potable water sources shall be dechlorinated, pH adjusted if necessary, reoxygenated, and volumetrically and velocity controlled to prevent resuspension of sediments. Water that has been hyperchlorinated shall not be discharged to the MS4, even after de-chlorination.

The amount of chlorine in potable water is typically extremely small (0.2 ppm or less). Generally, any residual chlorine will be used up during transmission through a storm system, either by aeration or by contact with silts and organics in the pipelines. I feel some flexibility should be given to the agency to determine if the travel time through the storm system prior to discharge is sufficient to neutralize any chlorine residual.

Adjusting pH of flushing water is not something that 99% water purveyors are set up to do, and could be cost prohibitive. Again, we're talking about clean domestic water in most cases.

Many fire districts routinely flush fire hydrants to test capacity, verify operations and for training. Requiring dechlorination, pH adjustment and oxygenation of such flushing will cause hardship and could result in fire systems being neglected rather than dealing with compliance.

The last sentence I find very confusing. "… hyperchlorinated shall not be discharged to the MS4 even after de-chlorination". Why not? If it's been dechlorinated, then what is the concern?

Thank you for your consideration.

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