

Washington Department of Fish and Wildlife

We have concerns about how Halamid or Chloramine T is managed in the permit. The FDA label on the compound sets a discharge benchmark for local NPDES authority, see the label for benchmark numbers. Currently it is required under our NPDES permit to measure free Chlorine within 15 minutes of taking a sample by a certified lab. Unfortunately there are few certified labs located within 15 minutes of most hatchery facilities. Hatchery specialists are not lab technicians and our attempts to get hatcheries as certified labs to measure Cl is difficult or unsuccessful. Discharge requirements in this permit essentially make this compound unusable and we have very few drugs at our disposal in aquaculture. Halamid is safe in fish and effective for many topical bacterial agents. Further Halamid when used is deperated with sodium thiosulfate. Given deperation and dilution from other ponds, our tests demonstrate we do not get measurable free Cl.

There must be another solution.

1. Can Cl be added to the exempted parameters on page 20 H
2. Can Cl be tested under the internal process control parameter in that list on page 20 H. Internal process control parameter is not defined in appendix B definitions.
3. Instead of measuring free Cl can the discharge level be calculated
4. Can we set a list of equipment to be used in the measurement of free Cl at hatcheries and provide training in the use of this equipment as a substitute for testing by a certified lab.
5. If the sample has to be measured by a certified lab can the sample be preserved so we can eliminate the 15 minute requirement and ship the sample to a certified lab.

We have so few drugs available for use in aquaculture, Halamid is safe and effective, we would not want to loose it based on discharge requirements.