

SePRO

50 mg/l.

The draft General Permit reads, "to be eligible for reduced monitoring for copper sulfate use, permittees must have 5 years of water hardness results that are all over > 50 mg/l". In addition to the afore mentioned data demonstrating lower toxicity of chelated copper products, it is also documented in low alkalinity and low hardness water (Straus and Tucker 1993) compared to copper sulfate.

The data supports a less stringent hardness level and monitoring period for when chelated copper is used compared with copper sulfate. We propose additional language stating, if chelated copper is being used, water hardness results for one year are needed and those results need to be > 25mg CaCO₃/L.

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