



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
Bureau of Climate and Environmental Health
Division of Environmental Health Regulations and Standards
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August 8, 2025

Kevin Brauer,
Director of Business Development
Clear-Flow
1115 W Liebaw Rd Suite 200
Mequon, WI 53092.

Re: Innovative Equipment Conditional Approval - Clear-Flow Electronic Flocculation

Dear Mr. Brauer,

The Massachusetts Department of Public Health (Department) has completed its review of your submitted request with supporting documentation for the use of Clear-Flow's Electronic Flocculation Technology as supplemental filtration enhancement equipment at public and semi-public swimming pools in the Commonwealth of Massachusetts.

The regulations for public and semi-public swimming pools, *105 CMR 435.00: Minimum Standards for Swimming Pools (State Sanitary Code: Chapter V)*, have established provisions to review new and innovative equipment and procedures or disinfection methods if it can be demonstrated that the application will achieve the intent of the regulations to provide a reasonably safe environment and that any hazard to public health is not greater than that of other approved equipment and procedures (*105 CMR 435.37: New and Innovative Equipment and Procedures*).

Based on our assessment, including a thorough review of your submitted information, it appears that Clear-Flow's Electronic Flocculation Technology aligns with the state's minimum requirements. This technology may only be applied in conjunction with the primary disinfection system and any additional secondary disinfection system already present.

Additionally, it is our understanding that this equipment will have no use of chemicals, does not stimulate the formation of byproducts, have any effect on the filtration system or the flow rate of the pool water. The water treatment equipment can only be used for public and semi-public swimming pools under the following conditions:

1. Compliance with Massachusetts Regulations: The Clear-Flow equipment must be installed, operated, and maintained in compliance with the relevant provisions of 105 CMR 435.00 and all other applicable laws.
2. Primary Treatment Requirements: The Clear-Flow equipment must not replace primary disinfection or filtration systems. It must work in conjunction with an approved primary treatment system to ensure full compliance with water quality standards. Massachusetts recognizes chlorine, maintained at an allowable range of 1.0-3.0 ppm, and bromine, maintained at an allowable range of 2.0-6.0 ppm, as primary disinfection chemicals.
3. Installation and Maintenance: All installations must be carried out by qualified personnel in accordance with the manufacturer's specifications. Pool operators must be trained in the operation, routine maintenance, and troubleshooting of the equipment to ensure safety and its continued effectiveness.
4. Water Quality Monitoring: Regular water quality testing must be conducted to confirm compliance with state-mandated parameters, including but not limited to pH, free chlorine/bromine residual, combined chlorine/bromine, alkalinity and turbidity (water clarity) in accordance with 105 CMR 435.29.
5. Labeling and Instructions: Clear and detailed instructions for installation, operation, and maintenance must be provided to all users of the equipment. Safety precautions and warnings must be prominently displayed.

The use of the Clear-Flow equipment is contingent upon strict adherence to the above conditions. The Department or local Board of Health reserves the right to rescind the use of this equipment if it is found to compromise public health or if at any time fails to meet current regulatory standards. Please note that local Boards of Health may have additional requirements or restrictions that must also be addressed. Given the limitations of this review, based on the assumptions and expectations of this equipment, the Department makes no claims to its efficacy.

The Department recommends that Clear-Flow's Electronic Flocculation Technology be submitted for product review by the Council of Model Aquatic Health Code (MAHC), specifically addressing the equipment's efficacy and filtration capability.

If you have any questions regarding this assessment or require further clarification, please do not hesitate to contact our office on 617-624-5757.

Sincerely,



Steven F. Hughes
Director, Division of Environmental Health Regulations and Standards
Massachusetts Department of Public Health