ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7
100 NORTH CANYONS PARKWAY, LIVERMORE, CA 94551-9486 • PHONE (925) 454-5000

June 12, 2012

Farhad Azimzadeh
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Sent via email to fazimzadeh@waterboards.ca.gov

Subject: ***Comments re: NPDES NO. CAG912004 –GENERAL WASTE DISCHARGE REQUIREMENTS for Discharge or Ruse of Extracted Brackish Groundwater and Reverse Osmosis Concentrate Resulting from Treatment of Groundwater by Reverse Osmosis and Discharge or Reuse of Extracted and Treated Groundwater from Structural Dewatering***

Dear Mr. Azimzadeh:

Zone 7 Water Agency (Zone7) supplies treated drinking water to more than 220,000 people in Pleasanton, Livermore, Dublin, and to the Dougherty Valley area of San Ramon. Zone 7 also supplies agricultural water to 3,500 acres, primarily South Livermore Valley vineyards, provide flood protection to all 425 square miles of eastern Alameda County, and manage the Livermore – Amador Valley Groundwater Basin.

Zone 7 requests that the underlined text shown below be retained from the existing order, and placed in section II E.2 (Findings) on page 4 of the tentative order for the NPDES NO. CAG912004 as follows:

2. RO concentrate from aquifer protection well discharges to estuarine environments (typically long term). Pumped groundwater may be treated by RO so that less saline groundwater may be returned to the drinking water supply, and the RO concentrate discharged as waste. RO concentrate discharges to sanitary sewer systems are not required to seek coverage under this Order. <u>In addition, RO concentrate discharges that are permitted under industrial pretreatment requirements to a permitted publicly-owned treatment works (POTW) are not required to obtain coverage under this Order.</u>

Retaining such language allows a more streamlined approach to achieve the same results and avoids double-permitting of those indirect/industrial dischargers already satisfying pretreatment requirements.

Zone 7 appreciates the opportunity to comment on the Tentative Order. If you have any questions or comments, please feel free contact either me at the number above (or email jduerig@zone7water.com) or Jarnail Chahal at 925-454-5027 (email jchahal@zone7water.com).

Sincerely,

G.F. Duerig
General Manager