



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

100 NORTH CANYONS PARKWAY, LIVERMORE, CA 94551

PHONE (925) 454-5000

March 16, 2006

Ms. Lila Tang
NPDES Permits Division
San Francisco Bay RWQCB
1515 Clay St. Suite 1400
Oakland, CA 94612

VIA E-MAIL AND U.S. MAIL

Subject: Draft Tentative Order for LAVWMA's Intermittent Wet Weather Discharge
(NPDES Permit No. CA0038679)

Dear Ms. Tang:

Thank you for the opportunity to comment on the Draft Tentative Order for the LAVWMA wet weather discharge permit. As with LAVMMA, DSRSD, Livermore and EBDA, Zone 7 Water Agency has some concerns with references related to "any discharge of extracted groundwater or groundwater concentrate, treated or untreated, into the LAVWMA facility." Any possible groundwater demineralization would be performed by Zone 7 in accordance with Zone 7's May 2004 Salt Management Plan which was required under Provision D.1.c.ii of the San Francisco Bay Regional Water Quality Control Board's ("Board") "Master Water Recycling Permit," Order No. 93-159 and approved by the Board on September 24, 2004 (copy of letter attached).

Therefore, Zone 7 requests that Board staff revise LAVWMA's Draft Tentative Order to reflect these facts before the Regional Board is asked to consider this item.

If there are any questions, please contact me at 925 454-5016.

Sincerely,


G.F. Duerig
Assistant General Manager

cc (by e-mail, only):

Vivan Housen, LAVWMA
David Requa, DSRSD
Darren Greenwood, Livermore
Chuck Weir, EBDA



California Regional Water Quality Control Board

San Francisco Bay Region

Teri Tamminen
Secretary for
Environmental
Protection

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.swrcb.ca.gov/rwqcb2>

Arnold Schwarzenegger
Governor

SEP 24 2004

File: 2199.9295 (RJC)

Dale Myers, General Manager
Alameda County Flood Control and Water
Conservation District (Zone 7 Water Agency)
5997 Parkside Dr.
Pleasanton, CA 94588-5127

RECEIVED
SEP 27 2004

Dear Mr. Myers:

Subject: Zone 7 Water Agency - Salt Management Plan

We have received and reviewed your letter of June 3, 2004 transmitting the Executive Summary and supporting technical document for your Salt Management Plan (SMP), dated May 2004. This letter is approving the SMP with comments on future salt management monitoring plans. Separate approval from the NPDES Permit Division is required for seasonal groundwater export and wellhead demineralization, two salt management strategies that will result in discharges to surface waters.

The SMP is required under Provision D.1.c.ii of the San Francisco Bay California Regional Water Quality Control Board's (Board) "Master Water Recycling Permit," Order No. 93-159 (Master Permit) if the permittee(s) seeks to undertake a Group C project. The permit was issued to the Alameda County Flood Control and Water Conservation District (Zone 7), the City of Livermore (Livermore) and Dublin San Ramon Services District (DSRSD) in December of 1993. The Master Permit authorizes Livermore, DSRSD, and Zone 7 to produce, distribute, and manage recycled water projects throughout the Livermore-Amador Valley (Valley). The Master Permit requires that prior to implementation of valley-wide recycling projects, the permittees submit a SMP for approval by the Executive Officer. The permit also authorizes groundwater projects using surface spreading and well injection.

Recycled Water Projects in the Valley

In the early 1990's Zone 7, Livermore, and DSRSD conducted a valley-wide water recycling study and found that properly treated recycled water can provide a safe and cost-effective source of additional water supply. The study also found that use of demineralized recycled water could help improve the salt balance and groundwater quality. But relatively little recycled water has been used directly in the Valley due to concerns about potential impacts from elevated total dissolved solids (TDS) levels in recycled water.

The 1993 Master Permit and the SMP

Before extensive recycling projects could be implemented by Livermore and DSRSD under the Master Permit, a SMP required that would assess and manage the impacts of salt loading from those projects on the water quality of the Valley's underlying groundwater basin. Zone 7 would be the lead agency responsible for the development and implementation of the SMP. The SMP was developed during 1994-

1999 through a cooperative effort involving Zone 7 staff, technical consultants and local citizens. Over the years the scope broadened beyond that outlined in the Master Permit, to one more resembling a comprehensive watershed water resources management plan. It identifies and documents Zone 7's long-term plan and strategy for managing salts and mineral water quality within the Valley's groundwater basin. Most of the proposed projects in the Master Permit were never implemented, awaiting the implementation of a SMP to fully offset both current salt loading from natural sources and operations, and any future salt loading associated with new recycled water use. The success of the SMP in controlling salt loading on water quality in the Valley is essential if wastewater reuse is to reach its maximal potential in the Valley.

Salt Management Monitoring Plan (SMMP)

As part of the SMP, Zone 7 conducts an extensive groundwater monitoring program to identify changes in groundwater quality throughout the watershed, to refine salt loading estimates, and provide input to the groundwater models. It is proposed that Zone 7 would submit annual reports to the Board summarizing results obtained as part of the SMMP. In addition to data collected by Zone 7 for the SMMP, there are additional salt loading assessments that may be useful for the SMP. These may include salt loading data from Alameda County Water District, mining companies, septic tank discharges, increased agricultural irrigation outside the Main Basin, sanitary sewer overflows from Livermore's and DSRSD's sewage collection systems, Alameda County's stormwater control program that implements stormwater infiltration as best management practices, private recycled water projects, (i.e., vineyards) etc. Staff encourages Zone 7 to continue to incorporate such information into applicable Zone 7 databases so that Zone 7 can continue to serve as a centralized repository/clearinghouse for surface and groundwater quality and quantity information in the Valley.

Future Water Recycling Programs (General Permit)

Both DSRSD and Livermore have applied for the Board's **General Water Reuse Order** (General Order) to administer their current and future landscape and/or agricultural irrigation type recycled water projects within their individual jurisdictions. Both have completed Notices of Intent (NOI) as required by the General Order. As with the Master Permit, an approved SMP is also required under the General Order. Approval of the SMP by the Executive Officer will also satisfy the General Order's SMP requirement. All future surface recycled water projects by DSRSD and Livermore will be administered by the General Order, once their respective NOIs have been approved by the Executive Officer. Livermore and DSRSD have requested that the Master Permit be kept active to only address potential future groundwater recharge projects. Once the State Water Resources Control Board and the State Department of Health Services finalize new regulations on groundwater recharge reuse, the Board staff will work with Zone 7, Livermore and DSRSD in updating the Master Permit for those uses.

Approval of the Zone 7 Salt Management Plan

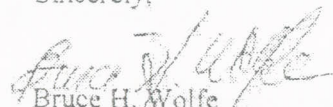
Our review of the SMP finds that program provides Zone 7 a very valuable, comprehensive and flexible tool for management of the Valley groundwater basin. It uses an adaptive management process to identify and evaluate many input sources of information that are used to modify salt management strategies for protecting/improving the basin's groundwater quality for domestic and municipal beneficial uses while maximizing recycled water use. This adaptive management process allows annual changes to Zone 7's salt management approaches and operational plans and helps ensure that they result in an optimized combination of strategies for any given year.

In addition to being an essential management tool for protecting and maintaining basin water quality, the SMP will provide the Board valuable insight on the impacts of salt loading on surface and groundwater quality from various sources in the valley. To that end, the Board would like to be apprised of Zone 7 policy directives, available water resources and demands in the basin, updates to groundwater modeling, salt loading tracking, and changes in salt management strategies in an annual summary report to this Board. The contents, format, and timing of the summary report submittal can be determined through consultation between our staffs.

I find that the **Salt Management Plan**, submitted by Zone 7 of the Alameda County Flood Control and Water Conservation District, pursuant to Master Permit Provision D.1.c.ii, satisfactorily meets the intent of the Master Permit. It is understood Zone 7 will be the lead agency responsible for SMP implementation, and that DSRSD and Livermore have committed to actively participate with Zone 7 in SMP implementation. We agree with the SMP approach that it will be implemented via an adaptive management process within the context of the annual Zone 7 water operations plan and in accordance with Zone 7 approved SMP policies and objectives.

If there are questions regarding this matter, please contact either Richard Condit at (510) 622-2338 or Shin-Roei Lee at (510) 622-2376.

Sincerely,


Bruce H. Wolfe
Executive Officer

cc: Mr. David Requa
Assistant General Manager
Dublin San Ramon Services District
7051 Dublin Blvd
Dublin, CA 94568

Mr. Darren Greenwood
Water Resources Division Manager
City of Livermore
101 W. Jack London Blvd.
Livermore, CA 94550

bcc: Lila Teng