



700 W Cook St
Santa Maria, CA 93458
800-400-2219
fax 805-922-9912

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Central Coast Water Board
centralcoast@waterboards.ca.gov

Public Comments Regarding Discharge Permit For South San Luis Obispo County Sanitation District
Wastewater Treatment Facility. Order No R3-2019-0002.

To Whom It May Concern:

My name is Justin Hurst and I am the owner of Culligan San Paso Co, a locally-owned water treatment company in San Luis Obispo County. I am writing today to support the brine discharge program at the Oceano treatment plant. Having a place to discharge clean salt water from the regeneration of softening resin is a critical piece of infrastructure to the portable exchange softening business. Without a way to safely get the salt water back to the ocean from which it came this product could not exist for consumers.

Over the last decade we have worked hand-in-hand with many local waste water treatment plants to encourage consumers to switch from self regenerating water softeners to portable exchange as a more environmentally friendly alternative. Portable exchange uses up to 80% less salt than an automatic water softener and we are able to capture all of the brine discharge and dispose of it properly. If the portable exchange market was regulated to the point of extinction by canceling our disposal sites permit the end consumer would certainly return to automatic water softeners. The inevitable growth in the personal water softener market would put a massive salt load on the down stream treatment plants. It would ultimately mean more salt was being used and the waste water would be much more difficult to treat since it would be mixed in with the rest of the waste stream.

It is my understanding that the primary objection by the groups opposing this program is that companies "might cheat". This seems like a ridiculous conspiracy theory. Enforcement at a monitored and staffed treatment plant is exponentially more than at any one of the 1000's of unmonitored manholes around the county or the 100's of miles of open coastline. While it is unfortunately a reality that there are people out there that might cheat, those individuals have far easier ways to do so than to go to a monitored and regulated treatment plant. If we apply the same logic to other activities that touch the ocean we should ban swimming, surfing and fishing because it is possible those activities could be used in a nefarious way as well.

Thank you,

Justin Hurst
President/CEO
Culligan San Paso Co