



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

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July 12, 2006

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

**Subject: Comments on Draft NPDES Permits for EBDA, DSRSD and
Livermore for Waste Water Discharge**

Dear Ms. Tang:

On behalf of Zone 7 Water Agency, thank you for the opportunity to comment on the Draft NPDES Permits for EBDA, DSRSD and Livermore for waste water discharges.

Salt and mineral buildup in the Livermore-Amador Valley Main Groundwater Basin has been a regional concern for a long time. Implementation of water recycling programs in the area could have further exacerbated the salt and mineral imbalance unless steps were taken to manage salts and minerals. In December 1993, the San Francisco Bay Regional Water Quality Control Board (RWQCB) issued the "Master Water Recycling Permit," Order No. 93-159 to DSRSD, the City of Livermore and Zone 7. The Master Water Recycling Permit included Provision D.1.c.ii, requiring a regional salt management plan (SMP). Although the regional recycled water agencies (City of Livermore and DSRSD) currently administer their recycled water irrigation projects under the RWQCB's "General Water Reuse Order" Order 96-011 ("General Order"), an approved SMP for the Main Groundwater Basin is required, as under the Master Water Recycling Permit.


The Zone 7 Board of Directors adopted the May 2004 Salt Management Plan in response to the requirement. The Salt Management Plan was approved by the Regional Board on September 24, 2004. The key component of the SMP is that salt would be removed from the basin by pumping groundwater and demineralizing the extracted groundwater. The SMP identified the disposal of the groundwater reverse osmosis (GW RO) concentrate from the groundwater demineralization plants to the San Francisco Bay via the regional waste water system/s.

Since the three draft NPDES permits enable Zone 7 to comply with the Master Water Recycling Permit and implement the SMP by allowing the discharge of GW RO concentrate through the regional waste water system and the NPDES permits, Zone 7 strongly supports the three draft NPDES permits.

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If there are any questions, please feel free to contact either me by phone at 925-454-5016 (or by e-mail at jduerig@zone7water.com) or Jarnail Chahal at 925 454-5027 (or by e-mail at jchahal@zone7water.com).

Sincerely,



G.F. Duerig
Assistant General Manager

GFD:JC:jr

cc: Dave Requa, DSRSD
Chuck Weir, EBDA
Darren Greenwood, City of Livermore