



Many of the processes to "treat" wastewater or wastewater polluted groundwater will include a reverse osmosis process. The reverse osmosis process has a brine discharge. This brine discharge could be toxic and or hazardous or could create environmentally disastrous conditions (e.g., a Kesterson bird poisoning type situation).

In addition some local agencies are proposing to place the brine discharge in a lined pit. As former Regional Board staff that closed nearly 80 Toxic Pits, this is a classic set up to generate NEW toxic pits, that are prohibited. The natural waters usually include natural metals leached from the soils and aquifer materials. In addition, many municipal piping systems include plumbing with dis-similar metals that cause a battery effect that sacrifices metals. These metals tend to build up in a pit or even the natural environment (e.g., Kesterson) creating a toxic pit or toxic discharge.

I do not see this brine discharge addressed in the Proposed General Permit.

Sincerely,

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