

Orange County Sanitation District

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July 29, 2014

**Public Comment
Desalination Amendments
Deadline: 8/19/14 by 12:00 noon**

Joanna Jensen
State Water Resources Control Board
1001 I Street, 15th Floor,
P.O. Box 100 Sacramento, CA 95814



SUBJECT: Comment Letter-Desalination Amendments

The Orange County Sanitation District (OCSD) appreciates this opportunity to provide written comments on the State Water Resources Control Board's (SWRCB) proposed amendments to the Ocean Plan addressing Desalination Facility Intakes, Brine Discharges, and other Nonsubstantive Changes. OCSD is a publicly owned wastewater agency, operating two treatment plants, one in the city of Fountain Valley and the other in the city of Huntington Beach. For more than 60 years, OCSD has been safely collecting, treating, disposing, and reclaiming wastewater generated by 2.5 million people living and working in central and northwestern Orange County. Each day OCSD treats approximately 200 million gallons of wastewater, encompassing a service area of 479 square miles.

In partnership with Orange County Water District (OCWD), OCSD provides approximately 70 million gallons a day of highly treated wastewater to the Groundwater Replenishment System (GWRS), a state-of-the-art advanced water purification system, which generates high-quality water that exceeds all state and federal drinking water standards. GWRS meets the needs of nearly 600,000 residents in north and central Orange County. OCSD seeks clarification specifically on the definition of "Desalination Facility" referenced on Appendix I Definition page 45 of the Ocean Plan. As it states, "DESALINATION FACILITY is an industrial facility that processes water to remove salts and other components from the source water to produce water that is less saline than the source water."

With increased pressure for water resources in California, new sources of water supply from wastewater recycling projects such as the Joint OCSD/OCWD Ground Water Replenishment System will be essential to help meet California's ongoing water demands. With this in mind, there are few viable options for brine disposal other than the ocean, especially for large-scale projects. Thus, ocean outfalls will increasingly be relied upon to properly dispose of brine from the wastewater recycling projects. As the current definition stands, Desalination Facility can be interpreted broadly enough to include wastewater treatment and recycling facilities that use wastewater as its source water to produce potable water. In contrast, however, the intent and scope of the proposed amendments to the Ocean Plan focuses on desalination facilities using seawater and not recycling projects using wastewater. The definition should be clear and consistent with "Chapter III.L.

We protect public health and the environment by providing effective wastewater collection, treatment, and recycling.

- Serving:
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- Huntington Beach
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- Seal Beach
- Stanton
- Tustin
- Villa Park
- Yorba Linda
- County of Orange
- Costa Mesa Sanitary District
- Midway City Sanitary District
- Irvine Ranch Water District





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Implementation Provisions for Desalination Facilities, section 1 (a)...***applies to desalination facilities using seawater***” referenced on page 27 of the Ocean Plan. Wastewater recycling has potential to provide millions of gallons per day of reclaimed potable water across the state. To help facilitate this needed practice, OCSD recommends that the definition of Desalination Facility in the Ocean Plan incorporate the term “seawater” to prevent misinterpretation.

OCSD appreciates this opportunity to provide input into the proposed amendments to the Ocean Plan addressing Desalination Facility Intakes, Brine Discharges, and other Nonsubstantive Changes. OCSD looks forward to working with SWRCB. If you have any questions regarding this letter, please contact Tom Meregillano at (714) 593-7457.

A handwritten signature in black ink, appearing to read "James Colston", with a long horizontal flourish extending to the right.

James Colston
Environmental Compliance Manager

TM:JC:jb

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