

October 16, 2018

Lompoc Artificial Kidney Center
Attn: Dr. Allyn and Dr. Kamal
127 W Pine Ave
Lompoc, CA 93436

Response to Request for Reconsideration

Dear Dr. Allyn and Kamal:

Thank you for your response, I have received and read your letter regarding the self-regenerating water softener dated October 5, 2018; and it is being considered a request for reconsideration, pursuant to Lompoc Municipal Code (LMC) section 13.16.140. Unfortunately, your self-regenerating water softener is not in compliance, and according to our research the following two options are available to you:

1. Have tanks brought in from an outside source, or
2. Install a waste water catchment tank and have it hauled regularly (provide the City with the manifests).

We realize that it creates an inconvenience to your business, however this ordinance is not an anomaly and other kidney dialysis businesses in the country do have to operate within the municipal ordinances of their given cities. According to your calculations, you are over four times the limit specified in the LMC (270 mg/L). Within our own City there have been many businesses including the hospital that have come into compliance by getting rid of their self-regenerating water softener, not to mention several large industrial users that operate within compliance and work hard to stay within compliance.

The City of Lompoc is not connected to the State water system and we rely on our ground water. This means that we need to stay vigilant about protecting our water source. Salt is a big problem and the City introduced its ordinance as a way to remedy this problem. Self-regenerating water softeners are the City's most common controllable salt contributor. Wastewater treatment plants operate under strict regulation and have to control and remove many different substances including salts before the water can be into the groundwater system. This jeopardizes our sewer system and the health of our environment and public.

According to our research in the CDC's *Guidance for the Content of Pre-market Notifications for Water Purification Components and Systems for Hemodialysis*, under section C, paragraph 3 "water softeners are to be used only for pre-treatment of water prior to R.O. or D.I." In this same article section H describes the guidelines for water storage tanks. I recommend reviewing these sections to alleviate your concerns.

In order to protect the City's sanitary sewer and Wastewater Plant, the Wastewater Division requires the Lompoc Artificial Kidney Center to:

1. Provide manifests of brine hauling and disposal if it has been done;
2. Submit a plan for water use going forward including water treatment plans;
3. Provide the City a sampling point;
4. Notify the City of any changes to your water treatment plan in the future; and
5. Comply with the LMC by March 25, 2019

The Lompoc Artificial Kidney Center is required to fulfill these conditions **by March 25, 2019**. Please respond to this letter at the address below, in writing and within **10 business days** after receipt of this response, addressing the specific steps you have taken, or will take, to correct this violation.

City of Lompoc Wastewater Division
ATTN: Water Resources Protection Tech
1801 W. Central Ave.
Lompoc, CA 93438

As part of the City of Lompoc's Pollution Prevention Program, the City may conduct inspections of all facilities. Recommendations and/or corrective actions will be made to ensure compliance with Federal, State, and local regulations.

Please be advised, pursuant to LMC section 13.16.140, you may file a written appeal of this decision to the City Council within 10 working days by forwarding your written appeal to the attention of the City Clerk at 100 Civic Center Plaza, Lompoc, CA 93436. The appeal shall be heard and decided by the City Council within 60 days after receipt of the request and the Council's ruling shall be final.

If you feel it would be beneficial to schedule a meeting with Wastewater or have questions, please call either Dorin Marrs 875-8408 or Katrina Dorsey at 875-8403.

Very truly yours,

Tikan Singh
Interim Utilities Director

c: City Manager
City Clerk
City Attorney