

Lompoc Artificial Kidney Center, LLC  
127 West Pine Avenue  
Lompoc, California 93436  
Telephone: 805-740-2000

Bob Lingl  
Mayor  
City of Lompoc  
Lompoc California

November 1, 2018  
By Hand

Dear Mayor Lingl:

We have been having discussions (letters attached) with your Wastewater department because someone complained to them that we use a water softener here at the Lompoc Artificial Kidney Center, LLC where we treat some of Lompoc's sickest residents with end stage kidney disease complicated by multiple co-morbidities. We are one of only a few 5 star facilities in the state.

To do so, we are required to treat the incoming feed water according to standards set forth by CMS, the California Department of Health Services, and AAMI to produce nearly pure water for dialysis treatments.

We use our own dedicated, sanitized, FDA grade water softener followed by Granular Activated Carbon tanks and an FDA approved reverse osmosis system. Many years ago we chose not to use commercial exchange tanks because we could never be sure where they had been, what chemical contaminants they might harbor, and had no efficient way of sanitizing them before putting them in service. We would also lose the capability of making sure that the devices had been disinfected properly and that the chemicals used for that purpose had been removed completely from the system before being reinstalled in our facility. (see note)

- Note: American National Standard ANSI/AAMI/ISO 26722:2009. Water Treatment Equipment for hemodialysis applications and related therapies
  - 4.2.1.3 Regenerated or reconstituted devices
    - All devices that are regenerated or reconstituted at a site remote from the dialysis facility, such as deionizers, shall be disinfected at the time of regeneration or reconstitution so that contaminated water is not reintroduced into the system after regeneration or reconstitution. Separate processes shall be used to ensure no intermixing devices of their components parts between devices returned for medical or potable water user and devices from non- potable water uses

In addition, using exchange tanks would have increased the facilities operating costs considerably.

We think the Wastewater department's concerns are misguided with regard to the risk of the sodium we generate. We were also disappointed that the Wastewater department seemed as if they could care less about the life saving treatments we provide here.

Your Wastewater treatment facility processes 3+ million gallons of water (12,000,000 liters) on a daily basis. If you divide the number of milliequivalents of sodium we generate per day by the 12,000,000 liters of water you will find that our sodium contribution amounts to 0.05 mEq/L (that is 5 one-hundredths of a milliequivalent per liter). This is an imperceptible amount posing no threat whatsoever to your waste water runoff areas or the underground aquifers.

We think we should be exempted because we are a medical facility using a government and FDA approved process to purify our water and because the amount of sodium we contribute to the waste water is trivial in the grand scheme of things.

We also believe that following the Lompoc Municipal Code (below) that we can meet the California Health and Safety Code sections 116775 to 11695 for the use of a our water softener.

**13.16.320 Water Softening Waste.**

A. It is unlawful to install, replace, or enlarge apparatus for softening all or any part of the water supply to any premises when such apparatus is an ion-exchange softener or demineralizer of the type that is regenerated on the site of use with the regeneration wastes being discharged to the ground, storm drain, or City sewerage system, unless said softener or demineralizer meets or exceeds the standards specified in California Health and Safety Code sections 116775 to 116795, relating to water softening or conditioning. This Section shall not apply to apparatus of the type which is regenerated off-site by a water conditioning company.

B. A person installing or operating a legal water-treating apparatus of any kind shall make such apparatus accessible to the Director for inspection at all reasonable times and shall make such report relative to such apparatus as the Director may request. (Ord. 1619(15) § 1; prior code § 3363)

We hope that you can be of assistance in adjudicating this matter.

We would be happy to sit down with you with our technical personnel if you feel further discussion is necessary.

We thank you in advance for your kind consideration.

Sincerely,



Thomas R. Allyn, MD, FACP  
CEO



Bindu M. Kamal, MD  
Medical Director

CC: California Department of Health Services, Licensing and Certification Division  
Mr. Tikan Singh, Interim Utilities Director, City of Lompoc